

The Drovers Solar Farm

Applicant's Response to Relevant Representations

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1 Introduction

1.1 Purpose of the Document

- 1.1.1 This document has been prepared on behalf of The Drovers Solar Farm Limited (the Applicant) in relation to an application (the DCO Application) for a Development Consent Order (DCO) to be made to the Secretary of State (SoS) to construct, operate and maintain, and decommission The Drovers Solar Farm (the Scheme), pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This document provides the Applicant's response to the Relevant Representations (RRs) submitted by statutory parties (including parties listed within the **Book of Reference [APP/4.3.2]**), as well as RRs submitted by organisations and individuals that are not statutory parties. It also provides responses to a summary of key themes arising from RRs submitted by members of the public.
- 1.1.3 The period for registering as an Interested Party through the submission of a RR ran from 19 January 2026 to 11:59 on 27 February 2026. The Applicant has confirmed that it has complied with sections 56 and 51 of the Planning Act 2008 and Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 in respect of publicising this period.
- 1.1.4 The Planning Inspectorate (PINS) has published 64 RRs submitted to the Examining Authority by Interested Parties relating to the Application for the Scheme. These were published on the PINS website on 9 March 2026. Additionally, Historic England [\[AS-060\]](#), Barbergh and Mid Suffolk Council [\[AS-061\]](#), the Environment Agency [\[AS-062\]](#) and Paul Bird [\[AS-064\]](#) each submitted late RRs which were accepted at the discretion of the Examining Authority. This brought the total number of RRs to 68.

1.2 Structure of the Report

- 1.2.1 This document provides responses from the Applicant to the matters raised in the RRs and is structured as follows:
- **Section 2** - local authorities and parish councils (including Breckland Council and Norfolk County Council who are the host authorities)
 - **Section 3** – prescribed bodies
 - **Section 4** – organisations and businesses
 - **Section 5** – land interests (as per the **Book of Reference [APP/4.3.2]**)
 - **Section 6** – elected representatives; and
 - **Section 7** – members of the public.



- 1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's The Drovers Solar Farm Examination Library.
- 1.2.3 Revision number suffixes have also been attached to any documents which, at Deadline 1, have been revised and resubmitted by to the Planning Inspectorate.

1.3 Tables of Organisations Submitting Relevant Representations

Table 1.1: List of Local Authorities and Parish Councils whose Relevant Representations are Responded to in Section 2.

Examination Reference	Library	Acronym	Relevant Representation Recieved From
RR-043		NCC	Norfolk County Council
RR-011		BC	Breckland Council
RR-010		KLWN	Borough Council of King's Lynn and West Norfolk
RR-054		PPC	Sporle with Palgrave Parish Council
RR-013		CAPC	Castle Acre Parish Council
RR-026		HHPC	Holme Hale Parish Council
AS-061		MSDC	Barbergh and Mid Suffolk Council

Table 1.2: List of Prescribed Bodies whose Relevant Representations are Responded to in Section 3.

Examination Reference	Library	Acronym	Relevant Representation Recieved From
RR-022		FOR	Forestry Commission
RR-036		NGET	National Grid Electricity Transmission Plc



RR-038	NE	Natural England
RR-003	AW	Anglian Water
RR-051	DIO	Safeguarding Department: Defence Infrastructure Organisation
RR-044	NLAF	Norfolk Local Access Forum
RR-037	NH	National Highways
AS-060	HE	Historic England
RR-021 and AS-062	EA	Environmental Agency

Table 1.3: List of Organisations and Businesses whose Relevant Representations are Responded to in Section 4.

Examination Reference	Library	Acronym	Relevant Representation Recieved From
AS-064		PB	Paul Bird
RR-015		CPRE	CPRE Norfolk
RR-056		SCE	Swaffham Climate and Environment Group
RR-045		NWT	Norfolk Wildlife Trust

Table 1.4: List of Land Interests whose Relevant Representations are Responded to in Section 5.

Examination Reference	Library	Acronym	Relevant Representation Recieved From
RR-014		LI	Charlie Ward

Table 1.5: List of Elected Representatives whose Relevant Representations are



Responded to in Section 6

Examination Reference	Library	Acronym	Relevant Representation Recieved From
RR-062		TH	Cllr Tim Hubbard
RR-025		GF	George Freeman MP
RR-029		JW	James Wild MP
RR-058		TJ	Terry Jermy MP

Table 1.6: List of Members of the Public whose Relevant Representations are Responded to in Section 7.

Examination Reference	Library	Relevant Representation Recieved From
RR-001		Adam Coombes
RR-002		Alicia Lirola
RR-004		Ania Skulimowska
RR-005		Anna Jacka
RR-006		Anne Mason
RR-007		Antony Gormley
RR-008		Antony Morgan
RR-009		Barber family on behalf of Davina Barber
RR-012		Brian Spencer
RR-016		Darren Almond
RR-017		David Gunner
RR-018		Dennis Pedersen



RR-019	Dr Mark Holmes
RR-020	Dr Thomas Frederick North
RR-023	Garlinda Birkbeck
RR-024	Gary Logan
RR-027	Ian Bower
RR-028	James Alexander Foster
RR-030	Jane Webber
RR-031	Jean Birkbeck
RR-032	Jeremy Bevan
RR-033	John Turner
RR-034	Michael Collins
RR-035	Mr M Thompson
RR-039	Neil Fegan
RR-040	Nichole Williams
RR-041	Nicola Holmes
RR-042	Nigel Lloyd
RR-046	Peter Fleck
RR-047	Philip Morton
RR-048	Richard Firth-Godbehere
RR-049	Richard Summerfield
RR-050	Roxanne Gamwells
RR-052	Sally Catherine North



RR-053	Sharron Morgan
RR-055	Stuart Barlow
RR-057	Tanya Hudson
RR-059	Thomas Edward Barber
RR-060	Thomas Edward Barber on behalf of The Eggleton Family
RR-061	Thomas Edward Barber on behalf of The Szewc Family
RR-063	Vicken Parsons
RR-064	Virginia Ker-Gibson



2 Local Authorities and Parish Councils

2.1 RR-043, Norfolk County Council

Reference number	Representation	Applicant response
NCC1	The County Council's over-arching position with regard to the Drovers Solar Farm Development Consent Order (DCO) is that it strongly opposes the proposal because of: • The cumulative impacts – including the loss of agricultural land; • Environment Impacts – on both the natural and historic landscape; • Impacts on the local community – particularly during the construction phases; • Lack of benefits for Norfolk – in respect of clean energy supplies; • Lack of strategic approach to major solar sites coming forward in the County; and • Lack of certainty surrounding grid connection.	The Applicant notes Norfolk County Council's overarching position and has addressed each of their points in turn below. <u>Cumulative Impact</u> The Applicant acknowledges that there are cumulative impacts from the Scheme and that these are set out in each of the ES Topic Chapter and are summarised in ES Chapter 18: Summary of Effects [APP-067]. The Scheme adopts a mitigation hierarchy to minimise cumulative impacts as far as reasonably practicable. Through site evaluation and iterative design, sensitive environmental receptors are avoided as much as possible, reducing the potential for in-combination effects with other developments. This approach is reinforced by embedding mitigation directly into the Scheme, including the strategic positioning of infrastructure away from receptors, the layouts being informed to limit the use of Grades 1 & 2 agricultural land and the incorporation of buffers and green infrastructure. The assessment of likely cumulative effects concludes the following significant residual adverse impacts: • Landscape and Visual: ○ E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the Scheme with High Grove Solar; and ○ VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the Scheme with High Grove Solar. • Noise and Vibration: ○ The Off Barn: there are significant adverse effects across the operation phase of the Scheme cumulatively with High Grove Solar. However, the cumulative effects assessment concludes that it is likely that noise levels can be controlled through the implementation of additional mitigation measures to suitable levels at 'The Off Barn' receptor when considered cumulatively with the neighbouring High Grove Solar Farm, such that residual levels would represent at most a minor impact, which is considered not significant, in EIA terms. • Soils and Agriculture: ○ BMV Land: there are significant adverse effects across the decommissioning phase of the Scheme cumulatively with High Grove Solar, East Pye Solar, Norfolk Vanguard Offshore Windfarm onshore elements and Norfolk Boreas Offshore Windfarm onshore elements. The assessment of likely cumulative effects also concludes that there are the following significant residual beneficial impacts: • Socio-Economics: Provision of education, skills and training: there are significant beneficial effects across all phases of the Scheme cumulatively with High Grove Solar. • Human Health: Provision of education, skills and training for the General Population: there are significant beneficial effects across the construction phase of the Scheme cumulatively with High Grove Solar. <u>Environment Impacts</u>



Reference number	Representation	Applicant response
		The ES assesses the likely significant impacts on a range of environmental receptors. The Applicant considers that the mitigation hierarchy has been appropriately applied to avoid, reduce and mitigate wherever practicable any likely significant adverse effects of the Scheme. As summarised in ES Chapter 18: Summary of Effects [APP-067], several significant adverse effects remain in relation to landscape and visual receptors as a result of the Scheme's construction, operation (short term, medium term and long term) and decommissioning phases. As set out in the Planning Statement [APP/5.5.1], the substantial benefits of the Scheme clearly outweigh the residual harms that would arise, including the Scheme's contribution to meeting Government targets on Clean Power by 2030 and Net Zero by 2050, together with more localised beneficial effects that are anticipated during the construction, operation and decommissioning phases of the Scheme, such as beneficial effects to ecology and biodiversity, jobs and permissive paths. <u>Impact on the local community</u> The Applicant confirms that the impacts of the local community have been considered in the assessment of the environmental impact of the Scheme. There are a number of mitigation measures that have been embedded into the design of the Scheme, as set out in (for example) the oCEMP [APP/7.6.1], oCTMP [APP/7.7.1], the oOTMP [APP/7.9.1], and the oDS [APP/7.10.1]. Notably, construction traffic and HGVs will be restricted to access the Scheme from the east via the A1065 only, with internal routes provided within the Scheme to ensure that vehicles do not need to use the local road network or route via any of the local villages. The routing for HGVs is set out within the oCTMP [APP/7.7.1] and will be secured by way of requirement on the DCO. Failure to comply with the requirements of the DCO is a criminal offence. With respect to the impact on the A1065, the additional impact of construction traffic associated with the Scheme is considered within the ES Chapter 9: Transport and Access [APP/6.2.1], which concludes that the impact on the A1065 would be negligible. Nonetheless, mitigation measures are proposed within the oCTMP [APP/7.7.1] which include restrictions on HGV deliveries to avoid the AM (08:00-09:00) and PM (17:00-18:00) peak hours when network flows are typically at their highest, as requested by Norfolk County Council and National Highways. The Applicant has prepared and submitted a Statutory Nuisance Statement [APP-041] as is required under APFP Regulation 5(2)(f) and Paragraph 4.15.5 of NPS EN-1 (2023). The Statutory Nuisance Statement [APP-041] draws upon the assessment conclusions from ES Chapter 16: Other Environmental Matters [APP-065] and ES Chapter 10: Noise and Vibration [APP-059] to set out that the construction, operation and decommissioning phases of the Scheme would not cause a statutory nuisance. <u>Benefits for Norfolk</u> Efforts to provide specific benefits in locally impacted communities are set out in the oESSCS [APP-195] (for employment and economy), in the oLEMP [APP/7.11.1] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes (as secured in the oPRoWPPMP [APP-192]), or through the Community Benefit Fund (separate to the DCO process). The Applicant is committed to ensuring that communities benefit from the Scheme. As set out in the Planning Statement [APP/5.5.1], the Applicant has committed to providing a Community Benefit Fund. 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 Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). The Statement of Need [APP-042] provides evidence that there is an urgent need for an unprecedented capacity of new low carbon electricity generation schemes to come forward to deliver legally binding carbon emission reduction targets, maintain security of supply and deliver on the affordability of energy. “Solar is a key part of the government’s strategy for low-cost decarbonisation of the energy sector”, per paragraph 2.10.9 of NPS EN-3 (2023). NPS EN-3 (2025) explains at paragraph 2.10.2 that “Solar energy is at the heart of [the



Reference number	Representation	Applicant response
		<i>Government's] Clean Power 2030 Mission” and at paragraph 2.10.5 that “Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation.”</i> Such an increase in generation capacity is needed to decarbonise current electricity demand and also to meet the expected significant increase in electricity demand over the coming years <i>“as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity”</i>, per paragraph 3.3.3 of NPS EN-1 (2023). The 2025 NPS maintains the same wording at paragraph 3.3.3, which further supports our position as the policy has remained consistent in this regard. The Statement of Need [APP-042] also explains that the overhead line, into which the Scheme will connect, is an existing part of the National Electricity Transmission System with sufficient capacity to transmit the energy that the Scheme will generate, so will provide access to low carbon, low marginal cost and will secure energy for both local and national consumers. This is a key benefit of the Scheme. <u>Strategic Approach to Solar Sites</u> The Applicant is aware of other projects in the region. Each of the ES Topic Chapters and ES Chapter 18: Summary of Effects [APP-067] consider the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Applicant has addressed the topic of cumulative effects earlier in this response. The Statement of Need [APP-042] and Planning Statement [APP/5.5.1], 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. The Clean Power 2030 Action Plan paves the way for new strategic plans for development of the GB energy system. The Connections Action Plan is clear that NESO's Connections Reform process and NESO's longer-term strategic network and system planning processes must be aligned to ensure the overall network remains optimally planned. It is therefore expected that NESO's strategic plans build upon their own connections queue prioritisations to deliver coherent and consistent recommendations to deliver the Clean Power target on the way to achieving net zero. The Statement of Need [APP-042] explains that the proposed location is appropriate for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in timeframes compatible with the Government's aims, coupled with sufficient solar irradiance, and a suitable area of secured land for the proposed solar and BESS. <u>Grid Connection</u> The Applicant has included the proposed National Grid Substation as associated development to the Scheme. Therefore, if the Scheme is approved, the proposed point of connection will also be approved. This is because the Applicant is not aware of any obvious reasons as to why this substation should be refused as associated development to the Scheme. However, it is important to note that NGET has a commercial obligation under the Applicant's Grid Connection Agreement to provide a grid connection for the Applicant. Additionally, under NGET's Licence (standard licence condition D4A) NGET is required to undertake all reasonable steps to obtain the required consents for its substation. In terms of the implications, therefore, if the National Grid Substation was not consented as associated development to the Scheme, NGET would need to find an alternative point of connection for the Scheme. The Applicant has had, and continues to have, regular monthly meetings with representatives from NGET and NESO; these meetings commenced before the grid connection application was submitted. The Applicant is confident NGET will approve the proposed substation location.



Reference number	Representation	Applicant response
		The Applicant therefore respectfully disagrees that there is uncertainty surrounding grid connection for the Scheme and provides further clarity in respect of the DCO Application's position in connecting to the grid in its Response to section 89(3) letter dated 17 March 2026 [AS-063] .
NCC2	Cumulative Impact – In addition to this proposal there are three other major solar farms across Norfolk, which are of a scale, which means they will need to be determined as Nationally Significant Infrastructure Projects (NSIPs). These projects include the neighbouring High Grove Solar Farm Project (1,400 ha); the East Pye Solar Farm in South Norfolk (1,110 ha); and the Tasway Solar Farm in South Norfolk (1,100 ha). This latter scheme is understood to have been paused as it has not received a Gate 2 Grid Connection Offer from the National Energy Systems Operator (NESO). These nationally significant projects could therefore result in the cumulative loss of over 4,000 ha of agricultural land across Norfolk. The County Council has repeatedly expressed concern about the loss of Best and Most Versatile (BMV) land (i.e. loss of productive agricultural land) in the context of this and other solar projects. It is understood that over 54% of the land taken up by this proposed solar farm would be on BMV land (i.e. Grade 1; 2; and 3a).	The Applicant is aware of these of NSIP projects and has undertaken an assessment of likely cumulative effects for the relevant projects, provided in each of the ES Topic Chapters and is summarised in ES Chapter 18: Summary of Effects [APP-067]. ES Appendix 2.4: Cumulative Schemes [APP-136] confirms that the cumulative assessment includes, but is not limited to, High Grove Solar Farm and East Pye Solar Farm. ES Chapter 2: EIA Process and Methodology [APP-051] sets out the methodology for considering cumulative schemes in the EIA, which aligns with the PINS Advice on Cumulative Effects Assessment (September 2024). The methodology sets out three 'tiers' of development that should be considered in the cumulative assessment, acknowledging a decreasing level of certainty as to how 'reasonably foreseeable' the developments are to come forward. Tier 3 represents the least certain developments and require a project to be registered on the PINS programme of projects; at present, Tasway Solar Farm is not registered on the PINS website as an NSIP and therefore does not meet the 'least certain' criteria as a cumulative scheme. In accordance with PINS guidance, Tasway Solar Farm does not warrant inclusion in the assessment of cumulative effects as part of the EIA for the Scheme. Responding to the specific concern of cumulative agricultural land loss, this is considered within ES Chapter 11: Soils and Agriculture [AS-018] where a worst-case cumulative assessment has been applied. This sets out that there is the potential for permanent land loss of BMV quality from all the developments to exceed 20ha, which would result in a cumulative impact of a moderate adverse effect, which would be significant in EIA terms. Section 11.11 of ES Chapter 11: Soils and Agriculture [AS-018] considers the cumulative effects with other large-scale solar proposals and concludes that the cumulative effect is also small, around 1% of farmed land in Norfolk. Looking at impacts from the Scheme directly, ES Chapter 11: Soils and Agriculture [AS-018] concludes that, with embedded and additional mitigation measures in place, the Scheme itself would not result in any significant adverse effects on soil or agricultural land resources throughout its lifecycle. There will be some permanent land take associated with the National Grid Substation and grid connection infrastructure, but this will amount to less than 5 ha of BMV land, plus less than 5ha for mitigation planting, as set in Table 11-7 of ES Chapter 11: Soils and Agriculture [AS-018]. Overall, the ES Chapter 11: Soils and Agriculture [AS-018] concludes that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production. The Statement of Need [APP-042] explains that the proposed location is appropriate for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in timeframes compatible with the government's aims, coupled with sufficient solar irradiance, and a suitable area of secured land for the proposed solar and BESS.
NCC3	Environmental Impacts – the solar farm raises serious environmental concerns not only in terms of the solar panels proposed but also the ancillary supporting infrastructure required including; a converter station; battery storage facility; and grid connection infrastructure (400kV substation). The proposal will involve new pylons connecting the solar farm to the 400 kV transmission network. This raises significant concerns given this would involve new transmission infrastructure (pylon towers; and overhead lines) in the sensitive River Nar Valley; and which is in close proximity to the historic settlement of Castle Acre with its Castle and Priory. The County Council has made clear that it favours the use of fixed solar panels with a lower height (3.5 metres) rather than tracking panels (up to 4.5 metres) as	Assessed landscape and visual effects are detailed within ES Chapter 6: Landscape and Visual [AS-016], which outlines potential landscape and visual impacts upon receptors within the Nar Valley and Castle Acre, as a result of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area, including those within Castle Acre and the Nar Valley. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.



Reference number	Representation	Applicant response
	they would have less visual and landscape impacts. The applicant has indicated that these matters have yet to be finalised. As such there remains concern regarding the potential impacts associated with tracking solar panels, which are of greater height, and are likely to be significantly more visible across this sensitive environmental and historic area.	Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.5 <i>"respect setting of heritage assets along the Nar Valley"</i>, 2.8 <i>"consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane"</i> and 2.9 <i>"consider experience of people using the PRow"</i>. Mitigation measures have included: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRow and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.2.1]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. A number of visualisations of the Scheme, showing the retention of existing pylons alongside new proposed pylons, have been produced from viewpoints situated within Castle Acre and along the Peddars Way and Norfolk Coast Path. These are included within ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045].



Reference number	Representation	Applicant response
		The assessed landscape and visual effects detailed within ES Chapter 6: Landscape and Visual [AS-016] consider a worst-case scenario with both the existing line of pylons, and new diversion, and also considers the 'tallest' maximum design parameters (i.e. the 4.5m tracker panels) of the Scheme. Taking account of the maturation of existing and extensive new planting, alongside other embedded mitigation measures, the assessment concludes there would be no significant operational long-term adverse visual effects associated with the Scheme. Visualisations of the Scheme have been prepared from a number of locations. Parameter based photowires are included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089] and ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031]. Photomontages of an illustrative scheme are included within ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. The impact of the Scheme, including the Grid Connection Infrastructure, on heritage receptors within the Nar Valley and Castle Acre, have been assessed from a heritage perspective in ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. Castle Acre Conservation Area, South Acre Conservation Area, Castle Acre Castle, Castle Acre Priory, Church of St George, and Church of St James have all been assessed as sensitive receptors in the Nar Valley and Castle Acre; no significant effects as a result of the Scheme have been concluded for these receptors. The Applicant is seeking flexibility in design parameters to allow for technological advancement to maximise energy production in line with Design Principle 4.1. The EIA has been undertaken in accordance with the Rochdale Envelope approach in order to assess the maximum parameters and allow for a decision on the technology choice to be made at the point of procurement. Both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage.
NCC4	Impact on Local Communities and Business - There are concerns regarding the disruption the proposed development will have during its construction on local residents and businesses; particularly on the local road network. There are also serious concerns associated with the battery storage element of the proposal in relation to the County Council's role as Norfolk Fire and Rescue Service (NFRS). Detailed highway matters and the implication for NFRS are set out in more detail below.	Construction traffic and HGVs will be restricted to access the Scheme from the east via the A1065 only, with internal routes provided within the Scheme to ensure that vehicles do not need to use the local road network or route via any of the local villages. The routing for HGVs is set out within the oCTMP [APP/7.7.1] and will be secured by way of requirement on the DCO. Failure to comply with the requirements of the DCO is a criminal offence. An oBSMP [APP/7.14.1] has been prepared for the BESS element of the site which details the alignment with the National Fire Chiefs Council Planning Guidance for BESS installations. Consultation with the Norfolk Fire and Rescue Service forms a key element in the determination of the site layout and design and will be conducted as part of the planning process. With respect to the impact on the A1065, the additional impact of construction traffic associated with the Scheme is considered within the ES Chapter 9: Transport and Access [APP/6.2.1], which concludes that the impact on the A1065 would be negligible. Nonetheless, mitigation measures are proposed within the oCTMP [APP/7.7.1] which include restrictions on HGV deliveries to avoid the AM (08:00-09:00) and PM (17:00-18:00) peak hours when network flows are typically at their highest, as requested by Norfolk County Council and National Highways. Further responses to the detailed highway matters and implications for Norfolk Fire and Rescue Service are provided in turn below.
NCC5	The County Council has also expressed concern that the impacts of glint and glare need to be thoroughly considered and has recommended that the applicant consult with the Ministry of Defence and the Civil Aviation Authority, RAF Marham, the airfield operator at the Great Friar Thornes Farm Airfield, and potentially also the Highway Authority and National Highways.	The Ministry of Defence have been consulted regarding impacts towards RAF Marham, and aviation receptors associated with RAF Marham are assessed within the ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176]. ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176] concludes a low impact is predicted towards RAF Marham's approach paths for tracking panels, and the Applicant considers that this glare scenario could be considered operationally accommodatable; consultation with RAF Marham is ongoing to confirm the Ministry of Defence's position. If glare is considered operationally



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		accommodatable, the times and dates of potential 'yellow' glare will be provided to the aerodrome such that pilots can be briefed. National Highways have also been consulted regarding impacts upon nearby roads, including the A1065. Impacts upon Great Friar Thornes Airfield have also been assessed within the ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176] which concludes that there are no significant impacts anticipated on this receptor.
NCC6	Lack of Benefits for Norfolk -. The County Council had advised the applicant on the need to actively engage with the County Council and other key stakeholders, including National Grid and United Kingdom Power Networks (UKPN), to explore and provide clarity as to how the project could bring benefits for the County in terms of clean energy supplies. There is no evidence that such engagement has taken place to any meaningful extent; and as such there remain serious concerns regarding the lack of benefits the project will bring to both residents and businesses in Norfolk in line with the County Council's Climate and Economic Strategies.	The Applicant has been actively engaging with Norfolk County Council and others, including on the benefits of the Scheme, during the pre-application stage. This engagement is set out in the Consultation Report [APP-025]. 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. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider scale benefits of the Scheme. The low carbon electricity generated by the Scheme would be exported to the national grid, at which point it would be transmitted across the National Electricity Transmission System to local and national customers, as consumption requires, by NESO. The Scheme will make a contribution to meeting the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (2023 and 2025) (section 4.2) and NPS EN-3 (2023 and 2025). This therefore will benefit national consumers, including local consumers. The Planning Statement [APP/5.5.1] confirms that community benefits would be realised at a local level, should consent be granted for the DCO Application. For example, the oPRoWPPMP [APP-192] establishes how permissive paths proposed as part of the Scheme will be designed and implemented to improve accessibility across the Site. Efforts to provide specific benefits in locally impacted communities are set out in the oESSCS [APP-195] (for employment and economy), in the oLEMP [APP/7.11.1] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes (as secured in the oPRoWPPMP [APP-192]), or through the Community Benefit Fund (separate to the DCO process). The Applicant is committed to ensuring that communities benefit from the Scheme. As set out in the Planning Statement [APP/5.5.1], the Applicant has committed to providing a Community Benefit Fund. 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 Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). The Applicant's contract is with NGET and not with UKPN; therefore, it is at the discretion of NGET to contact UKPN on this matter.
NCC7	Lack of Strategic Approach - The County Council is concerned at the lack of a strategic approach to the siting solar farms across the County and the cumulative impacts associated with multiple large scale solar farms will have on Norfolk's environment, and local communities and businesses affected as indicated above. The lack of any strategic foresight in solar farms coming forward in Norfolk is leading to large piecemeal developments coming forward across Norfolk following existing transmission lines (400kV). Reforms to the grid-connection system leading to the creation of the NESO was supposed to provide the necessary checks and balances to ensure a more strategic joined up approach to the delivery of renewable energy projects. In Norfolk that does not seem to have happened as this	The Applicant is aware of other projects in the region. Each of the ES Topic Chapters and ES Chapter 18: Summary of Effects [APP-067] consider the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Applicant has addressed the topic of cumulative effects earlier in this response. The Statement of Need [APP-042] explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in the timeframes indicated, coupled with sufficient solar irradiance, and a suitable area of secured land for the Scheme. The Scheme will



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	project while not receiving a firm Gate 2 Grid Connection Offer from the NESO, is nevertheless still actively being taken forward through the planning process. These grid connection issues are considered in more detail below.	therefore provide both local and national customers with access to low carbon, low marginal cost and secure energy. This is a key benefit of the Scheme. <u>Strategic Approach</u> The Clean Power 2030 Action Plan paves the way for new strategic plans for development of the GB energy system. The Connections Action Plan is clear that NESO's Connections Reform process and NESO's longer-term strategic network and system planning processes must be aligned to ensure the overall network remains optimally planned. It is therefore expected that NESO's strategic plans build upon their own connections queue prioritisations to deliver coherent and consistent recommendations to deliver the Clean Power target on the way to achieving net zero. The Applicant is aware of other projects which exist and are being proposed in the region. ES Chapter 17: In-Combination Effects [APP/6.2.1] 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 the ES Topic Chapters. The Applicant has been informed that the Scheme has been re-prioritised with a Gate 1 connection offer. Having a Gate 1 connection offer means there is not yet a confirmed grid connection location or date to connect the Scheme. However, project development will continue and the Applicant can apply again to move into Gate 2 in future rounds. The Government is clear that the Clean Power 2030 Action Plan and Connections Reform is not about stopping projects, but is about prioritising projects for 2030, while maintaining a robust pipeline beyond 2030. Projects which continue to demonstrate they are 'ready' are expected to be re-prioritised, especially as the Government continues to refine its criteria for 'strategic alignment'. It is also anticipated that some projects currently in the queue may drop out. The Applicant will keep developing the Scheme with the aim of securing a Gate 2 connection in a future round, and the Applicant will keep local representatives and communities updated as matters progress.
NCC8	At this stage while it is understood that the applicant has received a Gate 1 Grid Connection Offer from the NESO, it has been unsuccessful in the most recent round of Gate 2 Grid Connection Offers. As a result, there is uncertainty as to where precisely the grid connection point will be; and when this might occur. Nevertheless, the Applicant's ES proceeds on the basis of a new substation and new grid connection in the north-east part of the site. The ES notes that consultation with NGET "has confirmed that this is the likely technical configuration..." (para. 5.3.45). NPS EN-1 makes clear that the connection of a proposed electricity generation plant to the electricity network is an important consideration for applicants wanting to construct or extend a generation plant. The system for securing grid connections has been subject to significant recent change following the Energy Act 2023, resulting in the setting up of the NESO in October 2024. The NESO's role is to manage electricity and gas system planning in Great Britain. This has resulted in a more strategic planning lead approach to the development and management of the electricity grid. NPS EN-1 (paragraph 4.11.2) recognises that under the previously essentially market lead system it was for the applicant to ensure that there will be necessary infrastructure and capacity within the existing or planned transmission or distribution network to accommodate the electricity generated. Under the new system the applicant must obtain a firm, a Gate 1 and then a Gate 2 Connection Offer from the NESO to proceed.	The Statement of Need [APP-042] explains that the proposed location is appropriate for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in timeframes compatible with the Government's aims, coupled with sufficient solar irradiance, and a suitable area of secured land for the proposed solar and BESS. The Applicant has included the proposed National Grid Substation as associated development to the Scheme. Therefore, if the Scheme is approved, the proposed point of connection will also be approved. This is because the Applicant is not aware of any obvious reasons as to why this substation should be refused as associated development to the Scheme. It therefore follows that the point of connection for the Scheme would be at the National Grid Substation as consented as part of the Scheme, and not in some other as yet undefined location. However, it is important to note that NGET has a commercial obligation under the Applicant's Grid Connection Agreement to deliver a grid connection to the Applicant. Additionally, under NGET's Licence (standard licence condition D4A) NGET is required to undertake all reasonable steps to obtain the required consents for its substation. In terms of the implications, therefore, if the National Grid Substation was not consented as associated development to the Scheme, NGET would need to find an alternative point of connection for the Scheme. The options available, should NGET want to find an alternate location for the substation, are set out in the Applicant's Response to section 89(3) letter dated 17 March 2026 [AS-063]. However, the Applicant



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	A Gate 1 Connection Offer serves as an initial step for projects that provides essential information for planning but does not guarantee a connection, reflecting the ongoing reforms in the UK's energy connection process. This process is part of the NESO's efforts to manage the high volume of connection requests effectively. Projects that receive a Gate 1 offer can later apply for a Gate 2 Grid Connection Offer, provided they meet the necessary readiness and strategic alignment criteria. Gate 2 offers are aimed at allocating confirmed connection dates and points to projects that meet specific criteria. This process is critical for ensuring that projects are viable and progressing. To receive a Gate 2 offer, projects must meet certain readiness and strategic alignment criteria. This includes providing evidence of project viability and alignment with strategic energy goals. There are regular application windows with specific deadlines. Following the closing of the window, offers will be confirmed (or not), with notifications sent to developers regarding whether they have received a Gate 1 or Gate 2 Grid Connection Offer. The position in relation to the Drovers, as set out above, is that applicant has received a Gate 1 Grid Connection Offer from the NESO, but has been unsuccessful in the most recent round of Gate 2 Grid Connection Offers. This does not prevent them from reapplying in a future application window for a Gate 2 offer, and it is understood that this will be the case, but that as a result a Gate 2 offer is now unlikely within the timescales for the Examination for the Drove Solar Farm. As a result, there is uncertainty as to where precisely the grid connection point will be and when this might occur. The revised version of NPS EN-1 (2025) makes it clear that this lack of a firm grid connection offer, does not prevent an applicant proceeding with their DCO application, but it does make it clear that the applicant must take the commercial risk to proceed. It states (at paragraph 4.11.6); that: “In this situation applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible.” The risk is that if the DCO is approved in advance of the securing of Gate 2 Grid Connection Offer, that (a) a Grid 2 grid connection is not forth-coming or (b) that the Gate 2 Grid Connection Offer is different from that approved under the DCO, i.e. the point of connection is offsite. In these circumstances it is highly likely that the environmental assessment of the project would not accurately reflect the environmental effects of the approved grid connection for which the Grid Connection Offer has been made and that a separate and additional application, whether submitted as an NSIP application or as an application under the Town and Country Planning Act 1990. The difficulty with this position is that if the applicant does not know what the details of the grid connection will be, then the details set out in the application are no more than the assumed details, and assessment of the environmental impacts cannot be considered on the basis that there is certainty that the project will proceed as proposed.	wishes to emphasise that it considers the likelihood of this happening to be low, as the proposed location for the National Grid Substation has been chosen using guidance from NGET¹ to inform the process. The Applicant has been informed that the Scheme has been re-prioritised with a Gate 1 connection offer. Having a Gate 1 connection offer means there is not yet a confirmed grid connection location or date to connect the Scheme. However, project development will continue and the Applicant can apply again to move into Gate 2 in future rounds. With the information provided in the DCO Application, it is possible for Norfolk County Council to fully assess the impacts of the Scheme. The Government is clear that the Clean Power 2030 Action Plan and Connections Reform is not about stopping projects, but is about prioritising projects for 2030, while maintaining a robust pipeline beyond 2030. Projects which continue to demonstrate they are 'ready' are expected to be re-prioritised, especially as the government continues to refine its criteria for 'strategic alignment'. It is also anticipated that some projects currently in the queue may drop out. The Applicant will keep developing the Scheme with the aim of securing a Gate 2 connection in a future round, and the Applicant will keep local representatives and communities updated as matters progress.

¹ Guidelines on Siting and Design: <https://www.nationalgrid.com/document/346731/download>



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	In the absence of Gate 2 Grid Connection Offer, it is unlikely that this matter will be resolved through any future grid connection application rounds within the timescales of the Examination. Without the certainty of a firm grid connection offer and knowledge of its location, it is not possible for the County Council to fully assess the impacts of the proposal. As such the County Council has significant concerns regarding these uncertainties given the very sensitive natural and historic landscape which the proposal is sited close to; and the practical difficulties as a Host Authority to thoroughly assess the DCO application in respect of the authority's statutory role as: Highway Authority; Lead Local Flood Authority and Minerals and Waste Planning Authority.	
NCC9	NCC is disappointed that the application does not include an underground alternative for the proposed diversion of the existing dual circuit 400kV overhead line (OHL) into the new National Grid Substation, as it had requested in response to the PIER statutory consultation. The application states that up to 10 new pylons will be built along the proposed diversion route leading into the new substation, although the proposed decommissioning of up to seven of the pylons on the existing alignment is welcome.	Connecting to the OHL point of connection via transmission cables overhead was considered the most effective and least disruptive form of connecting to the grid. Underground cabling would likely have presented challenges in disturbing tree and hedge roots and below ground archaeology. Additionally, undergrounding these cables would lead to a loss of the current carrying capacity (rating) of these cables, which could materially affect the amount of electricity transmitted. Connecting to the existing transmission line via OHL cables is seen as a common practical method, considering the close proximity of the OHL to the proposed National Grid Substation. Typically, underground cabling is reserved for much longer distances where it is not feasible to run overhead cables.
NCC10	It is also disappointing that the application has not definitively confirmed the type of solar panel that will be used, and that it still retains the option of using a 4.5m high tracking panel. NCC remains of the view that fixed solar panels with a lower height of 3.5 metres, which would have less visual and landscape impact than tracking panels of up to 4.5 metres, should be used.	The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in ES Chapter 5: The Scheme [APP/6.1.2]. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The Applicant is seeking flexibility in design parameters to allow for technological advancement to maximise energy production in line with Design Principle 4.1. The EIA has been undertaken in accordance with the Rochdale Envelope approach in order to assess the maximum parameters and allow for a decision on the technology choice to be made at the point of procurement. Both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage. ES Chapter 6: Landscape and Visual [AS-016] and accompanying visualisations have accounted for the worst-case scenario with regard to consideration of the height of different types of Solar PV Arrays. With regard to Solar PV Array type, the potential landscape and visual effects detailed within ES Chapter 6: Landscape and Visual [AS-016] considers a worst-case scenario, i.e. the 'tallest' maximum design parameters (i.e. the 4.5m tracker panels) of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.
NCC11	NPS EN-5 requires applicants to demonstrate due consideration of costs and benefits of feasible alternatives, and the absence of undergrounding leaves a significant gap in mitigation for landscape and visual impacts. NCC urges the applicant to explore additional measures to reduce, mitigate, or compensate for residual impacts in line with the mitigation hierarchy set out in NPS EN-1.	Potential landscape and visual effects, as well as mitigation measures, have been considered from the outset of the Scheme, in line with the mitigation hierarchy. As outlined in the Design Approach Document [AS-009], throughout the design process, the Applicant adopted an interdisciplinary approach to design, considering both the opportunities and constraints of the Scheme. This included analysis of the existing physical, environmental, social and cultural context of the Site by a broad range of technical disciplines (including landscape and visual, noise, ecology and heritage). The interdisciplinary approach to design will be carried through to the detailed design stage.



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		As set out in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] , there are no significant effects arising from the proposed new OHL reported within the ES, and the Site is not within a National Landscape; as such, it was not considered necessary to further explore underground cabling as an alternative option.
NCC12	Landscape character sensitivity and value Chapter 6 clearly sets out that Landscape sensitivity is derived from a combination of susceptibility and value. The LVIA baseline identifies landscape characteristics within the study area that include: • Intact estate farmland patterns; • Wooded skylines and shelterbelts (forming defining horizons); • Historic parkland and designed landscape elements; • Sparse settlements, tranquillity and relative remoteness; and • The presence of public rights of way and promoted recreational routes. These features are consistently identified within the baseline landscape character descriptions and supporting appendices. NCC considers that such characteristics are generally associated with increased susceptibility to large scale solar development, particularly where development introduces built form, perimeter fencing, substations and associated infrastructure over a wide area. However, NCC is concerned that the subsequent judgements on landscape sensitivity do not appear to fully reflect this susceptibility. Landscape sensitivity is a key determinant in the assessment of magnitude and significance of effects – where susceptibility is underplayed there is a risk that significant landscape effects also become understated. NCC understands that this is a matter of judgement not a methodological concern, but it considers that it is suitable to raise this concern and to ask the applicant to: • Provide further justification explaining how the identified susceptibility factors have been weighted in reaching the overall landscape sensitivity judgements; • Clarify how perceptual qualities such as tranquillity, enclosure, skyline integrity and recreational function have influenced sensitivity conclusions; and • Confirm that sensitivity judgements are considering baseline online and not including assumptions about mitigation effectiveness.	ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. Paragraph 6.5.18 and Table 6-3 outline the approach in determining the susceptibility, and therefore sensitivity, of landscape and visual receptors within the study area. The Site falls within numerous LCAs, as outlined within the Breckland Landscape Character Assessment (2007) and confirmed and validated through fieldwork. The Applicant does not agree that the judgments made do not accurately reflect the susceptibility and that the Applicant has understated any significant landscape effects. A review of published assessments and fieldwork to the Site and the surrounding study area informed a professional judgement of the identified susceptibility factors and the landscape sensitivity judgements made. The variation in identified susceptibility factors for different LCAs informed the weighting of the overall landscape sensitivity judgements. For clarity and with regard to the LCA within the Site; LCA D1: Swaffham Heath LCA and LCA E6 North Pickenham Plateau LCA are deemed to be of community value and have a medium susceptibility to the type of development proposed in resulting in overall medium-low sensitivity for these LCAs. LCA B7: River Nar Tributary Farmland LCA and F1 River Nar Valley LCA are deemed to be of community value and have a high susceptibility to the type of development proposed resulting in an overall medium sensitivity for the LCA. Perceptual qualities such as, but not limited to, tranquillity, enclosure, skyline integrity and recreational function have influenced sensitivity conclusions through an assessment of landscape value included within ES Appendix 6.5: Evaluation of Landscape Value [APP-143]. The perceptual characteristics of other LCAs within the wider study area were also identified through desktop studies of published material and numerous extensive fieldwork visits within summer and winter months. It is confirmed that sensitivity judgements consider baseline conditions only and do not include assumptions regarding mitigation effectiveness. The methodology for assessment is detailed within Section 6.5 of ES Chapter 6: Landscape and Visual [AS-016].
NCC13	Landscape Value Chapter 6 assesses the landscape value of the study area. NCC notes that whilst the assessment acknowledges the community level value, there is a strong emphasis on the absence of national or local designations when determining value. There is a risk that this approach may underrepresent certain important values such as: • Experiential and perceptual value; • Recreational value; and	The methodology for assessing landscape value is detailed within Section 6.5 of ES Chapter 6: Landscape and Visual [AS-016]. Definitions of varying levels of landscape value are detailed within Table 6-2. Experiential and recreational qualities identified in the baseline have been considered when determining landscape value and have influenced sensitivity conclusions through an assessment of landscape value included within Table 3 of ES Appendix 6.5: Evaluation of Landscape Value [APP-143]. This value assessment considered a number of factors such as Natural Heritage, Cultural Heritage, Landscape Condition, Associations, Distinctiveness, Recreational, Perceptual (scenic), Perceptual (wilderness and tranquillity) and Functional. The value rating for these factors varied between local value, community value and limited value – reflecting the presence and value of respective qualities within the Site and its context. The overall judgement for the value of a landscape receptor, such as an LCA of community value, takes account of the different value



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	- The contribution of historical landscape features Landscapes may be valued for reasons beyond formal designation and where value is understated the combined outcome for landscape sensitivity may not fully reflect the importance of the landscape to communities and users. NCC would like to ask the applicant to: - Clarify how experiential and recreational qualities that have been identified in the baseline have been considered when determining landscape value, particularly where landscapes are not formally designated but contribute to the perceived value and enjoyment of the area; - Consider recognition of higher community value in sensitivity judgements; and - Consider additional mitigation or enhancement measures where effects are identified.	ratings ascribed to the factors referred to above. These judgements are balanced and representative of the qualities highlighted within the assessment. With regard to experiential qualities, the value assessment assessed perceptual (scenic) as community value, noting <i>“the Site is relatively visually contained in the central and southern areas and is of greenfield nature. In the Site’s northern area, there are some views northwards across the Nar Valley towards heritage assets within Castle Acre. The context of the Site to the north, east and west is currently rural and generally typical of the surrounding landscape. Swaffham is situated to the south of the Site, however there is limited intervisibility between the Site and settlement. In the local landscape, passing traffic is visible and audible along the A1065 and A47. As such, these highways serve as detractors within the local landscape.”</i> With regard to wilderness and tranquillity, the value is assessed as limited and notes <i>“a degree of tranquillity is experienced in the vicinity of the Site. However, the nighttime presence of Swaffham, adjacent villages and nearby A1065 to the east affect both tranquillity and any potential for dark skies. The agricultural land within the Site has altered the landscape so that it cannot be considered wild.”</i> With regard to recreational qualities, the value is assessed to be of local value and states <i>“There are a number of PRow and recreational routes within the Site that connect to other local PRow networks and long distance trails within the Site’s context. The surrounding landscape is accessible by a number of interconnected PRow that exist between local villages in the surrounding landscape, as shown on Figure 6.8 Amenity and Recreation Facilities [APP/6.3]”</i>. There are a number of different mitigation measures embedded within the Scheme which have been included to limit potentially adverse effects upon the landscape. These mitigation measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant’s Global Design Principle 2 and more specifically Project Principles 2.1 <i>“respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment”</i>, 2.5 <i>“respect setting of heritage assets along the Nar Valley”</i>, 2.8 <i>“consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane”</i> and 2.9 <i>“consider experience of people using the PRow”</i>. Mitigation measures have included: - Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew’s Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access - Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site - In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site’s context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider Study Area, and from PRow and droves within the Site itself - The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and



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		long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings - Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site; and - As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits.
NCC14	Recreational Receptors The LVIA identifies several public rights of way and promoted routes within and around the study area. Whilst visibility may be intermittent or filtered, NCC are concerned that the change in landscape character experienced along the routes may be more substantial than is reflected in the applicant's conclusions. For recreational users effects are not limited to individual viewpoints but instead relate to the cumulative experience of moving through the landscape. NCC would like to ask the applicant to: - Clarify how experiential change along the routes has been assessed, outside of individual viewpoints - Consider route specific mitigation measures through planting or landscape enhancements to offset experiential change In relation to the timing and effectiveness of Mitigation, NCC requests further clarification on the advanced planting and phasing of landscape mitigation to ensure the prevention of significant effects. Overall, the matters raised above are primarily on the application of professional judgement rather than deficiencies in methodology, therefore NCC is satisfied that these issues are capable of resolution through further clarification and consideration of the scheme.	The Applicant does not agree that the change in landscape character experienced along the routes may be more [substantial] than is reflected in the conclusions. ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. ES Chapter 6: Landscape and Visual [AS-016] assesses the potential sequential visual effects upon visual receptors within the Site and study area. Paragraph 6.6.71 of ES Chapter 6: Landscape and Visual [AS-016] states <i>“The different types of groups assessed within this ES chapter encompass local residents; people using key longer distance routes such as roads, cycle ways, recreational routes and navigable waterways; people within accessible or recreational landscapes; people using PRow; or people visiting key viewpoints. In assessing areas of settlement, PRow and local roads, receptors are grouped into areas where effects might be expected to be broadly similar, or areas which share particular factors in common. Longer distance routes and specific viewpoints are not included within these groupings, to allow the sequential experience of travelling along the routes or the key elements that make up a specific view to be considered in a coherent way.”</i> Generally, the assessment considers visual effects upon routes as part of their wider respective Visual Receptor Group (VRG). A total number of 7 VRGs have been identified within the Site and Study Area. Paragraph 6.6.84 of ES Chapter 6: Landscape and Visual [AS-016] states <i>“Where receptors overlap with one or more VRGs, i.e. PRow within the Site that extend across both VRG 1 and VRG 2, they are considered within both VRG's. This approach highlights any variations in effect upon a Receptor across the Site which may occur due to proximity to new development and the type of new development proposed at certain points along a route, for example.”</i> For longer distance routes, i.e the Peddars Way and Norfolk Coast Path, routes are assessed as a “standalone” receptor with narrative on potential sequential views. Route specific mitigation is included within mitigation measures embedded within the Scheme which have been included to limit potentially adverse effects upon landscape and visual receptors. These mitigation measures include those listed above in response to comment NCC13. All mitigation measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.1 <i>“respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment”</i> and 2.9 <i>“consider experience of people using the PRow”</i>. As set out within the Design Approach Document [AS-009], Design Principles 2.8 and 2.9 were established recognising the importance of the local road and PRow. As a result of these design principles, the Applicant



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		has committed to mitigation measures which are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1], which include: • Construction traffic routed internally through the Site from the access proposed on the A1065. • No access to the Scheme off Narford Lane. • A single crossing to River Road. • One access point off South Acre Road which would be temporary to facilitate construction of the Grid Connection Infrastructure. • Minimum 15m offset to Solar PV Arrays (including security fencing) from all PRow. • Protecting the droves and limiting the number of crossing of Fincham and Petticoat to two crossings per drove. • Creating 50m wide corridors along Fincham Drove and Petticoat Drove. • Inclusion of noise barriers and tree belts in the vicinity of Field 27. • A general strategy for the strengthening and gapping up of hedgerows along PRow along with new hedgerow planting. • No cable runs or construction access along the Fincham nor Petticoat Drove. • A minimum of a 15m offset from Standalone Conversion Units and Integrated Conversion Units / 33kV Sub-distribution Switch Rooms to PRow. One of the aims of the advanced planting is to increase visual screening from year 1 of the operation phase. Advanced planting works have taken place in winter 2025/2026. The linear length of advanced planting is 3,878.7m, or approximately 3.8km. Details of the advanced planting areas are included within oLEMP [APP/7.11.1]. Phasing of the remaining landscape mitigation areas would be confirmed during detailed design and post consent. It is envisaged that all proposed planting would be undertaken during the construction phase as soon as practically possible, to maximise growing time before operation and the effectiveness of visual screening.
NCC15	NCC raised a number of questions at the PIER stage in relation to the detailed consideration of ecology and biodiversity. It remains concerned that adequate buffer areas round badger setts should be maintained, in line with guidance from the Badger Trust and that any works which has the potential to disturb badgers may require a licence. NCC also advises that it is important that the applicant should be aware of upcoming to changes to Biodiversity Net Gain (BNG) in relation to NSIPs. Whilst these details are not currently available, NCC is concerned about they will influence the design of the proposed BNG. There needs to further detail as to how BNG will be secured i.e. whether through a S106 agreement; and/or using a Conservation Covenant. Any BNG will need to have regard to the Local Nature of the Recovery Scheme (LNRS). NCC's detailed comments are follows. In the non-technical summary: "4.2.36 Minimum offsets/buffers from existing landscape features have been embedded within the design of the Scheme (Table 4-1) and are secured within the Design Principles, Parameters and Commitments [APP/5.8] by requirement of the DCO Application, see Table 4-1, with the exception of where Access Tracks,	As set out in ES Appendix 7.1: Consultation and Legislation, Planning Policy and Guidance [APP/6.4.1], it is agreed that any disturbance of a badger sett is illegal. As such, safeguards with regard to badgers are detailed within ES Appendix 7.2: Baseline Ecological Survey Report [APP-148]. Badgers within the Site are habituated to disturbance within close vicinity to their setts given the current agricultural use, with fields adjacent to these setts being regularly disturbed by ploughing, etc. Buffers of 20m around outlier setts are in line with Statutory guidance from Natural England (Badgers and Development. A Guide to Best Practice and Licensing. December 2011) and as such are considered appropriate. The Applicant notes Norfolk County Council's point regarding the Local Nature of the Recovery Scheme (LNRS) and confirms that the Biodiversity Net Gain Assessment Report [APP/7.4.1] has been updated to take into account the published Norfolk LNRS at Deadline 1. The BNG will be secured through Requirement 9 in Schedule 2 to the draft Development Consent Order (DCO) [APP/3.1.1].



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	perimeter fencing, Cabling and / or Grid Connection Cables are required to cross an existing feature. These are secured within the DCO”. The table 4-1 describes the buffer area round badger setts recommendations are: 1 Buffer Setts (Main) – 30m 2 Buffer Setts (Outer) – 20m The buffer around outlier setts should not be smaller. The area is based of guidance from the Badger Trust the buffer areas should be based on disturbance type around the sett not the sett type. 5.1 Badger disturbance “It must be recognised that badgers can be disturbed by work near a sett, even if there is no direct interference or damage to the sett. It is difficult to know what badgers will find disturbing in each circumstance or where in a sett badgers may be living. In light of this, Badger Trust considers the following activities may require a licence: 3 Use of heavy machinery within 30 metres of any sett entrance; 4 Use of lighter machinery (particularly for digging) within 20 metres of any sett entrance; 5 Use of hand tools such as hand digging or scrub clearance within 10 metres of any sett entrance”. These are guidelines only and any disturbance to a sett is illegal. “Natural England standing advice is that badgers could be affected if the development proposal causes: 6 Damage to sett; 7 Loss of setts; 8 Loss of foraging areas; 9 Disturbance to badgers while they’re occupying setts – from noise, lights, vibration, fires or chemical use. Work which leads to any of the above is illegal without a licence”. BNG It is important that the applicant should be aware of upcoming to changes to Biodiversity Net Gain (BNG) in relation to NSIPs. Whilst these details are not currently available, they will influence how this NSIP’s BNG will be designed. There needs to further detail as to how BNG will be secured i.e. whether through a S106 agreement; and/or using a Conservation Covenant. Any BNG will need to have regard to the Local Nature of the Recovery Scheme (LNRS). Protected Species It is welcomed that areas have been set aside for bird mitigation. Should the applicant have any queries with the above comments please contact Samuel Demmen-Sewell (Principal Ecologist) Samuel-demmen-sewell@norfolk.gov.uk	



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NCC16	The impacts on archaeology are assessed in the Environmental Statement Chapter 8: Cultural Heritage and Archaeology (APP-057). Likely effects have been assessed for the construction, operation and decommissioning phases of the Scheme. NCC advises that there has been a significant amount of contact and discussions with the applicants' archaeological consultant during the pre-application phase of the application, and that it has had previous sight of ES Chapter 8, Appendix 8.7: Outline Archaeological Mitigation Strategy (APP-161). An amended version of the document has been agreed which includes the undertaking of further trenching with the amount and location of any additional trenching being proportionate to the overall cumulative impacts, and to be confirmed following completion of the detailed design. Should the applicant have any queries with the above comments please contact John Percival, Historic Environment Senior Officer (Strategy and Advice) john.percival@norfolk.gov.uk	The Applicant notes this comment and welcomes the recognition from Norfolk County Council that sufficient information has been provided in order to formulate a mitigation strategy for the potential impacts of the Scheme upon the archaeological resource. Engagement with Norfolk Historic Environment Service will continue to ensure the mitigation strategy is implemented.
NCC17	The traffic and transport impacts of the development are assessed in the Environmental Statement Chapter 9: Transport and Access (APP-058), which is also supported by a separate Transport Assessment (Appendix 9.2) (APP-163). NCC is concerned that the proposed construction traffic and access arrangements present significant challenges due to routing constraints. Specifically, it considers Route C unsuitable for construction traffic from the Narford Road junction with the A47 due to substandard road widths. Similarly, it considers that Big Wood Lane and South Acre Road should not be promoted for construction traffic. The following comments have been provided by the local Highway Authority based on a review of Environmental Statement Chapter 9: Transport and Access and Environmental Statement Chapter 9 Appendix 9.2 Traffic Assessment, and the other supporting documents as set out below. Where stated the comments refer to the paragraph numbers in each document. Environmental Statement Chapter 9: Transport and Access (APP-058) 9.4.12 – Norfolk Constabulary AIL team will need to be involved with Transformer delivers. 9.5.8 – Study Areas 10 to 16 are not anticipated to accommodate traffic associated with the scheme. However, Route C intersects the location where Links 15 and 16 are proposed. This route is not preferred by the highway authority due to the substandard road width. 9.5.20 – All construction vehicles to miss peak times for the am and pm. 9.6.4 – Route C is not acceptable and discussion for this route confirmed no HGVs. However, since our discussions with the developer, the route has been driven and LGV's should not be using this route either. Discussions involved all construction traffic to use A1065 accesses and haul route to the different land parcels on the site. 9.6.9 and 9.6.10 – as per comment above. More detail on traffic numbers for LGVs using this route are required. 9.6.18 – PRow should relate to document 7.12 and not 7.14.	The Applicant makes note of the comments and provides the following responses on a point-by-point basis. In response to 9.4.12, the contractor will ensure that all abnormal load deliveries involve consultation with the Norfolk Constabulary AIL team, coordinated through the National Highways Electronic Service Delivery for Abnormal Loads (ESDAL) System that is used prior to obtaining the relevant licenses and approvals for the delivery, prior to commencement. This commitment is made within the updated oCTMP [APP/7.7.1] and is to be secured via requirement through the detailed Construction Traffic Management Plan. In relation to the comments on 9.5.8, following the feedback from Norfolk County Council, it is proposed to restrict all construction traffic (including from staff, LGVs and HGVs) to only access the Scheme via the A1065 and not use Route C. The supporting oCTMP [APP/7.7.1] and oOTMP [APP/7.9.1] have been amended to reflect this restriction. In response to 9.5.20, as secured in the oCTMP [APP/7.7.1], delivery trips will be restricted to avoid the AM (08:00-09:00) and PM (17:00-18:00) peak hours. Regarding the comments on 9.6.4, 9.6.9 and 9.6.10, with 'Route C' not being used by LGVs, it is noted that Route C only accommodated 2% of the total car/LGV traffic and did not accommodate any HGV traffic, which is the equivalent to 11 two-way daily vehicle trips so this request will be accommodated and the routing in the oCTMP [APP/7.7.1] will be amended accordingly Assuming this traffic is added onto the A1065, where all vehicles are now required to access from, it is not considered that this change in traffic will lead to any material change from the conclusions identified within ES Chapter 9: Transport and Access [APP/6.2.1], as the revised distribution does not change any of the percentage thresholds that were considered. The conclusions that the impact of the Scheme on transport and access would be negligible are therefore still valid. In response to 9.6.18, PRow are addressed within the oPRowPMP [APP-192]. Regarding the impact of construction traffic numbers presented within Table 6.7 of ES Chapter 9: Transport and Access [APP/6.2.1], the Applicant confirms that HGVs are only proposed on the A1065. The HGVs presented in the table across Link 3, Link 5, Link 6, Link 7 and Link 9 were observed in the baseline surveys, so are not associated with the Scheme. In response to comments on 9.8.19 to 9.8.26, the additional HGVs shown on Link 8 (River Road South) are to reflect the vehicles travelling across the link along the internal routes as a sensitivity test. This approach was presented to Norfolk County Council within pre-submission discussions referred to in ES Appendix 9.1: Consultation and Legislation, Planning Policy and Guidance [APP-162]. However for completeness, the



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	Table 6.7 - Future Baseline Traffic Flows and Scheme Impact 10 Link 3 - South Acre Road North should have no HGV numbers showing with internal routes being proposed. 11 Link 5 - South Acre Road South should also have no HGV numbers showing with internal routes being proposed. 12 Link 6 - West Acre Road should also have no HGV numbers showing with internal routes being proposed. 13 Link 7 - Narford Lane should also have no HGV numbers showing with internal routes being proposed. 14 Link 8 - River Road South should also have no HGV numbers showing with internal routes being proposed. 15 Link 9 - River Road North should also have no HGV numbers showing with internal routes being proposed. 9.8.19 to 9.8.26 – Link 8 (River Road South) has the highest percentage usage, which further reinforces why this substandard route should not be considered. Additionally, South Acre RB6 and Swaffham RB1 intersect River Road, while West Acre RB7 relies on River Road for connectivity between these routes. 9.8.27 to 9.8.31 – As noted above, this route would negatively impact the RB network, and with the anticipated HGV volumes, River Road would become less safe and less attractive for users. Furthermore, U33064 Big Wood Lane—connecting the A1065 to South Acre Road—carries The Peddars Way and intersects with South Acre RB6 and RB7. Introducing construction traffic along this route would significantly alter the environment for pedestrians, cyclists, and equestrians. 9.11.5 to 9.11.11 – We appreciate that the developer has included High Grove Farm; however, the proposed dates (2028) and the 2.5-year construction timeline do not align with the information received to date (November 2025). Currently, High Grove Farm has no confirmed connection date, and the proposed programme will need to be revised once a connection date has been agreed with High Grove Farm. 6.3 ES Figure 9.1 Vehicle Routing and Constraints: Route C should not be promoted for any construction traffic from Narford Road junction with the A47. Big Wood Lane / South Acre Road again should not be promoted for construction traffic.	revised link assessment is included within an updated version of ES Chapter 9: Transport and Access [APP/6.2.1]. The change to the assessment is negligible and there are no changes to the assessment of effects or any conclusions of this chapter. In response to 9.8.27 to 9.8.31, with the restrictions on vehicle routing incorporated there will be no vehicles that impact the PRow network, as there will be no additional HGVs added along these routes, therefore there is no change to the environment for pedestrians, cyclists or equestrians. Vehicles will only travel across these areas temporarily when crossing via the internal haul roads, but this process would be managed by the mitigation measures outlined in the oCTMP [APP/7.7.1], which will include banksmen and signage to hold traffic as required, giving priority to users of the PRow. Regarding 9.11.5 to 9.11.11, the cumulative transport effects of the Scheme are considered within section 9.11 of ES Chapter 9: Transport and Access [APP/6.2.1], which concludes there are unlikely to be any significant cumulative effects. Whilst the connection dates for other cumulative sites is uncertain, it is considered that the use of TEMPRO growth factors discussed within ES Chapter 9: Transport and Access [APP/6.2.1] in the assessment would appropriately capture this growth by generating a percentage increase to baseline traffic flows, which is considered to be the optimum approach given the uncertainty on the programme or expected trip generation from these sites. With the proposed restrictions on vehicle routing, secured through the detailed Construction Traffic Management Plan, the primary road where cumulative effects could occur is on the A1065. However, from the recorded flows along the A1065 presented within section 2.4 of the ES Appendix 9.2: Traffic Assessment [APP-163], the typical daily traffic variations along the A1065 in the future baseline could be in the region of 794 to 985 total vehicles each day, (exceeding what is generated by the Scheme during the peak) which based on the thresholds set out in the IEMA EATM Guidance (2023) referred to within ES Chapter 9: Transport and Access [APP/6.2.1], would fall within typical daily traffic fluctuations - which are recognised as being in the order of 10% and well below the 60% threshold used in the guidance, above which significant transport effects may occur. In the event there is any overlap in programmes, there may be an increase in HGVs, however there will be collaboration within the forthcoming cumulative sites as detailed within Section 5.15 of the oCTMP [APP/7.7.1] that is to be secured by a requirement in the DCO, to ensure opportunities to minimise overlaps between HGV deliveries are taken and so that construction peaks are planned into the programmes accordingly so cumulative effects are mitigated. In response to 6.3, construction traffic is not proposed to utilise Route C as secured through the oCTMP [APP/7.7.1].
NCC18	Environmental Statement Chapter 9 Appendix 9.2 Traffic Assessment 2.3.4 and 2.3.5 – West Acre Road, Narford Lane and Narford Road are all substandard roads for construction traffic to use. 2.4.4 - mentions that local routes will not be used but these are used as per Route C in 6.3 ES Figure 9.1 Vehicle Routing and Constraints. 2.5.1 to 2.5.4 refer to comments 9.8.27 to 9.8.31 in 6.2 ES Chapter 9 Transport and Access and 10.2.11 in 6.5 Non-Technical Summary. 3.2.3 – confirms points A, B and C from the A1065 will only be used for construction and decommissioning and the other 6 points will be for internal haul route /	The Applicant proposes to restrict all construction traffic (including from staff, LGVs and HGVs) to only access the Scheme via the A1065 as requested by Norfolk County Council. The supporting oCTMP [APP/7.7.1] and oOTMP [APP/7.9.1] have been amended to reflect this restriction. The responses to the outstanding points are provided below: 2.3.4 and 2.3.5 – construction vehicles are not proposed to use West Acre Road, Narford Lane or Narford Road, as secured through the oCTMP [APP/7.7.1]. 2.4.4 – all vehicles will only access from the public highway via the A1065, as secured through the oCTMP [APP/7.7.1] and oOTMP [APP/7.9.1]. 3.2.3 – Access Points A, B and C are the only access points with direct access from the public highway to/from the A1065, with the remainder of the access points servicing as internal access routes / haul roads,



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	crossings. This is what I believed was agreed, however the points above contradict this. Table 3.1 Access strategy overview • Access references A, B, C, F and G agree with description and use. • Access reference D, H and I confirmation on exactly what works are required and for what use. 3.5.3 to 3.5.5 – Figure 3-2 exact highway boundary information will need to be provided to ensure / confirm works are within National Highways or Norfolk County Councils remit. Highway boundary search will need to be carried out by the highway boundaries team (highway.boundaries@norfolk.gov.uk) 3.9.3 – permitted construction routes to be via the A1065 accesses and internal routeing to be used and not route C. 4.2.2 – route C should not be used for any vehicles, all vehicles to access from A1065. No HGV access via route C (Narford Rd), so, what about Access Point I? 4.2.7 to 4.2.9 – 532 two-way movements worse case for staff / workers. 4.2.10 to 4.2.13 – peak HGV movement 96 two-way movements. All movements 628 two-way movements. 4.2.18 – River Road is proposed to be used for HGVs, see comment 4.2.2. 4.2.19 – even the relevantly small number of staff (2%) using the LRN north / south / west of the site will make these routes difficult for local residents. Appendix B: No comments at this stage. A more detailed discussion regarding the scope and nature of the works will be required. 4.66 Appendix C: No comments at this stage. Appendix D: No comments at this stage. A more detailed discussion regarding the scope and nature of the works will be required.	as summarised in more detail below. Therefore, there is no contradiction in the access strategy from what has been agreed. In response to the Norfolk County Council comments on Table 3-1 of the ES Appendix 9.2: Traffic Assessment [APP-163], the proposed access points are summarised in more detail below as set out in Table 3-1 and Annex B of the document, all secured via the oCTMP [APP/7.7.1] and oOTMP [APP/7.9.1]: • Access D: comprises the upgrade to the existing agricultural access points either side of Fincham Drove to accommodate the expected construction and operational vehicles, providing an internal route across the Scheme. Vehicles will only travel internally within the Scheme east and west through this access and will not arrive/depart via Fincham Drove. • Access H: comprises the upgrade to the existing agricultural access points either side of Fincham Drove to accommodate the expected construction and operational vehicles, providing an internal route across the Scheme. Vehicles will only travel internally within the Scheme north and south through this access and will not arrive/depart via Fincham Drove. • Access I: comprises the upgrade and relocation of the existing agricultural access points either side of River Road to accommodate the expected construction and operational vehicles, placing them closer together to minimise intrusion to the vegetation and avoiding the need for any vehicles to travel along River Road, so vehicles only need to travel across River Road for a short distance to join the internal Scheme roads. Vehicles will only travel internally within the Scheme east and west through this access and will not arrive/depart via River Road. The additional HGVs shown on Link 8 (River Road South) are to reflect the vehicles travelling across the link, via the internal routes from the A1065 as a sensitivity test, rather than vehicles travelling along the link to leave the Scheme via River Road. In this instance any vehicles will travel internally and access/egress via the A1065. Therefore, there is no contradiction from what was agreed with Norfolk County Council. Further responses to the relevant representations are provided below: 4. 3.5.3 to 3.55 - the highway boundary search has been requested from Norfolk County Council, which the Applicant expects to be confirmed prior to examination. In any case, it is likely that the exact boundary will be confirmed at the detailed design stage for any highway works. 5. 3.9.3 – construction vehicles are only proposed to access via the A1065, as secured through the oCTMP [APP/7.7.1]. 6. 4.2.2 – Route C is no longer proposed, with all vehicles accessing via the A1065. As noted above, Access I provides an internal access point across River Road. Vehicles will only travel east and west internally within the Scheme and will not arrive or depart directly onto River Road. 7. 4.2.18 – River Road is not proposed to be used by HGVs, with vehicles only travelling across this link to access the internal haul routes either side. 8. 4.2.19 – the distribution for staff trips has been adjusted so all vehicles arrive via the A1065, as presented within the updated ES Chapter 9: Transport and Access [APP/6.2.1] Regarding the comments on the access proposals and future highway works at Appendix B and D, the Applicant welcomes a more detailed discussion on the scope at an appropriate point in the future.
NCC19	Non-Technical Summary 3.1.4 – Washpit Drove is located on the western side off the A1065, will this be within the Order limits?	The Applicant makes note of the comments and has the following responses: • 3.1.4 - The extent of Washpit Drove is included within the Order limits as it will be used temporarily for access by the Finger Hill Lodge residents, when a temporary closure may be required to Petticoat Drove to facilitate the OHL works. However, it is not proposed to be used by construction vehicles and will only



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	3.1.6 – NTS figure 3.2 – no highway discussing have been had regarding works adjacent the Managed Traveller site. 4.1.4 – decommissioning does not include National Grid Substation and Grid Connection Infrastructure – is this normal? 4.2.27 to 4.2.31 – No information provided on the emergency access. 4.3.1 to 4.3.4 - I would expect that the site access to be established during the site preparation work stage. This could be either the permanent access arrangement via a S278 or a temporary access arrangement via a Small Highway Works Agreement (SHWA). Please contact highways as early possible to establish the highway works required and to ensure agreements are in place to start on site. 4.3.8 – Abnormal Indivisible Loads (AIL) to be confirmed with the Police AIL team. 10.2.8 – Route C would not be acceptable for HGVs to access with width restrictions on Low Road and South Acre Road. Route A and B are the preferred options. As per out discussions all access should be internally routed via the A1065. 10.2.11 – The Peddars Way is located along South Acre Road which would be a less attractive route if South Acre Road is used by construction vehicles. The Rebellion Way is located along Fincham Drove and South Acre RB6 & 7. I would expect this route to be kept open / mitigation as per a Public Right of Ways (PRoW).	be used temporarily when the OHL works are being undertaken for a short duration (e.g. a number of days rather than weeks or months), details of which are secured within the oCTMP [APP/7.7.1]. 3.1.6 – the highway works adjacent to the Manager Traveller Site will be temporary in nature to facilitate the AILs delivery only, details of which will be agreed with National Highways as part of the future AIL application via the National Highways Electronic Service Delivery for Abnormal Loads (ESDAL) System, which will include all technical approvals and licenses required for any temporary works needed. This is detailed within the oCTMP [APP/7.7.1] and is to be secured through the detailed Construction Traffic Management Plan. 4.1.4 - the National Grid Substation is proposed as permanent and the associated Grid Connection Infrastructure will be retained. This allows NGET the flexibility to make use of the National Grid Substation post decommissioning of the Scheme. The National Grid Substation will be built and operated by NGET and will be NGETs asset with associated infrastructure. The National Grid Substation may be able to provide future capacity for projects once the Scheme is decommissioned, hence the Applicant does not seek to include the removal of this infrastructure as part of decommissioning the Scheme. 4.2.27 to 4.2.31 – emergency vehicles will access the Scheme the same way other vehicles access the Scheme both during construction and once operational, which will be via the access on the A1065 then travelling via the internal haul roads to access the relevant location within the Scheme, details of which are secured within the oCTMP [APP/7.7.1] and oOTMP [APP/7.9.1]. 4.3.1 to 4.3.4 - the detailed design of any highway works for the Site access points within the public highway will be agreed with Norfolk County Council via the process set out in the draft DCO [APP/3.1.1] that effectively mirrors a typical Section 278 or Small Highway Works agreement. The details of these works would be confirmed with Norfolk County Council post-consent, prior to the commencement of the construction phase. 4.3.8 - the future contractor will ensure that the Norfolk Constabulary AIL team are consulted through the National Highways ESDAL system, secured through the detailed Construction Traffic Management Plan and as set out within the oCTMP [APP/7.7.1]. 10.2.8 – Route C will not be used for any vehicles, with all vehicles required to arrive via the A1065 to the east and then travel internally via the internal haul roads. The oCTMP [APP/7.7.1] and oOTMP [APP/7.9.1] have been updated to reference this restriction. 10.2.11 – construction vehicles will not use South Acre Road, as secured through the oCTMP [APP/7.7.1]. The PRoW along Rebellion Way and South Acre RB6&7 will be kept open throughout construction. In the event temporary closures are required (e.g. when the internal access points are being constructed), an appropriate diversion will be provided, the details of which will be secured in the detailed Public Rights of Way and Permissive Path Management Plan and as already outlined within the oPRoWPPMP [APP-192].
NCC20	Outline Construction Environmental Management Transport Access – Table 4 Transport and Access – Booking System – would this be required with all HGV's accessing from the A1065? Transport Access – Table 15 Transport and Access – Booking System – would this be required with all HGV's accessing from the A1065?	As detailed within section 5.5 of the oCTMP [APP/7.7.1], there will be a delivery booking system implemented during construction for all construction deliveries to assist with managing deliveries and ensuring there is sufficient space within the construction compounds to undertake the delivery. This approach will ensure that there are no missed deliveries, as well as ensuring multiple deliveries do not turn up at the same time. Further details will be provided in the detailed Construction Traffic Management Plan that is secured by way of a requirement in the DCO.



Reference number	Representation	Applicant response
NCC21	Outline Construction Traffic Management Plan Table 2-1 Access Strategy Overview: 16 Access references A, B, C, F and G agree with description and use. 17 Access reference D, H and I a more detailed discussion regarding the scope and nature of the works will be required. 4.1.2 – Restriction for LGVs will still be required on some off the local network to ensure no substandard local network is to become overcapacity. The site is very well located for all vehicles to access from the A1065. 4.1.5 – Route C has never been discussed with regards to non-HGV movements. Refer to comment above. 7 – Abnormal Indivisible Loads – Please contact Norfolk Constabulary for deliveries and routes.	In response to the Norfolk County Council comments, the proposed access points are summarised in more detail below as set out in Table 3-1 and Annex B of ES Appendix 9.2: Traffic Assessment [APP-163]: - Access D: comprises the upgrade to the existing agricultural access points either side of Fincham Drove to accommodate the expected construction and operational vehicles, providing an internal route across the Scheme. Vehicles will only travel internally within the Scheme east and west through this access and will not arrive/depart via Fincham Drove. - Access H: comprises the upgrade to the existing agricultural access points either side of Fincham Drove to accommodate the expected construction and operational vehicles, providing an internal route across the Scheme. Vehicles will only travel internally within the Scheme north and south through this access and will not arrive/depart via Fincham Drove. - Access I: comprises the upgrade and relocation of the existing agricultural access points either side of River Road to accommodate the expected construction and operational vehicles, placing them closer together to minimise intrusion to the vegetation and avoiding the need for any vehicles to travel along River Road, so vehicles only need to travel across River Road for a short distance to access the other side of the internal link. Vehicles will only travel internally within the Scheme east and west through this access and will not arrive/depart via River Road. The Applicant welcomes a more detailed discussion regarding the detail of these works. Regarding 4.1.2 and 4.1.5, the Applicant makes note of and accepts the request for all construction vehicles to arrive via the A1065 to the east. The oCTMP [APP/7.7.1] has been updated to incorporate this restriction. Regarding comments on section 7, the future contractor will ensure that the Norfolk Constabulary AIL team are consulted through the National Highways Electronic Service Delivery for Abnormal Loads (ESDAL) System. This is detailed within the updated oCTMP [APP/7.7.1] and is secured through the detailed Construction Traffic Management Plan provided prior to commencement.
NCC22	Outline Operational Traffic Management Plan Figure 2-1 Access Strategy Overview 18 Access references A, B, C, F and G: Agree with description and use. 19 Access reference D, H and I: More detailed discussion regarding the scope and nature of the works will be required. 3.2.5 – BESS units to be replaced up to five times during operational phase, what type of vehicle will these be transporter on? If HGVs, this would be via the main site access from the A1065. 4.1.3 – Restriction for LGVs will still be required on some off the local network to ensure no substandard local network is to become overcapacity. The site is very well located for all vehicles to access from the A1065.	In response to the Norfolk County Council comments, the proposed access points are summarised in more detail below as secured through the oOTMP [APP/7.9.1]: - Access D: comprises the upgrade to the existing agricultural access points either side of Fincham Drove to accommodate the expected construction and operational vehicles, providing an internal route across the Scheme. Vehicles will only travel internally within the Scheme east and west through this access and will not arrive/depart via Fincham Drove. - Access H: comprises the upgrade to the existing agricultural access points either side of Fincham Drove to accommodate the expected construction and operational vehicles, providing an internal route across the Scheme. Vehicles will only travel internally within the Scheme north and south through this access and will not arrive/depart via Fincham Drove. - Access I: comprises the upgrade and relocation of the existing agricultural access points either side of River Road to accommodate the expected construction and operational vehicles, placing them closer together to minimise intrusion to the vegetation and avoiding the need for any vehicles to travel along River



Reference number	Representation	Applicant response
		Road, so vehicles only need to travel across River Road for a short distance. Vehicles will only travel internally within the Scheme east and west through this access and will not arrive/depart via River Road. The Applicant welcomes a more detailed discussion regarding the detail of these works. In response to 3.2.5, the BESS replacement would likely take place via articulated vehicles, which will be restricted to use the main Site access on the A1065 only, then transporting the replacement materials through the Scheme via the internal haul roads. This is outlined within the oOTMP [APP/7.9.1] that is proposed to be secured by way of a requirement in the DCO. In response to 4.1.3, the Applicant makes note of and accepts the request for all operational vehicles to arrive via the A1065 to the east. The oOTMP [APP/7.9.1] has been updated to incorporate this restriction.
NCC23	Outline Public Right of Way and Permissive Path Management Plan No comments at this stage. A more detailed discussion regarding the scope and nature of the works will be required.	The Applicant acknowledges this comment and welcomes the opportunity to discuss this further with Norfolk County Council.
NCC24	Land Plan UK0037735.5772-DCOPlans-0002 Rev 0: Why are land plots 2-12, 2-23 and 2-35 being shown when all traffic should be accessing the site via the A1065 and internally haul routeing to the plots within the red line boundary.	The Applicant can confirm that all construction vehicles (LGVs and HGVs) will enter the Scheme via the A1065 from the east and route internally via the internal access roads, as secured through the oCTMP [APP/7.7.1]. The extent of 2-12 is included within the Land Plan [APP-008] as there may be a need to temporarily close Petticoat Drove when the overhead line works are being undertaken, so there will be a need to temporarily re-provide access for Finger Hill Lodge via Washpit Drove, for the residential access. This will only be temporary and short in duration for residential access, further details of which will be included in the detailed Construction Traffic Management Plan that is secured by way of a requirement in the DCO. All construction vehicles associated with the overhead line works will access and egress from the Scheme via the A1065. With respect to 2-23 on the Land Plan [APP-008], this is associated with securing rights to create and secure ongoing access into Field 35 for the provision of skylark mitigation, which will be comparable to the existing agricultural activity, so is not associated with any construction activity or HGVs. Regarding 2-35, this is shown where temporary traffic works may be needed for the overhead line works to provide access to this field, from which the main temporary construction access can be constructed which will be served from the A1065 for the associated construction works in this field to take place.
NCC25	Works Plan DWG NO: 9485_0409_A_Works_Plan Rev 0: Refer to comment above on the Land Plan.	The Applicant, in turn, refers to its response in the row above for NCC24.
NCC26	Streets Plan DWG NO: 9485_0402_A_Streets_Plan Rev 0: Refer to comment above on the Land Plan (UK0037735.5772-DCOPlans-0002 Rev 0).	The Applicant, in turn, refers to its response in the row above for NCC24.
NCC27	Access and Rights of Way Plan All PRoWs and Byways should be kept open or diverted if unable to remain open. More detail required on what the stopping up would consist off and for how long?	It is anticipated that all PRoWs will be kept open during construction, otherwise a suitable diversion will be provided. However, it is not possible to confirm this until the contractor is appointed and the construction methodology is confirmed. The details for any closures required and management strategy is initially provided in the oPRoWPPMP [APP-192], and the corresponding detailed plan will be secured by way of requirement and provided prior to the commencement of the construction phase.
NCC28	Protective Provisions	This comment is noted and accepted by the Applicant. The detailed design of any highway works within the public highway are to be agreed with Norfolk County Council via the process in the draft DCO [APP/3.1.1] that effectively mirrors a typical Section 278 or Small Highway Works agreement. The details of these works



Reference number	Representation	Applicant response
	Norfolk County Council would expect any temporary or permanent highway mitigation to be secured through Protective Provisions in the DCO; and by the developer entering into a Section 278 or a Small Highway Works Agreement. Should the applicant have any queries with the above comments please contact John Curtis, Highway Engineer NSIPs, john.curtis@norfolk.gov.uk	would be confirmed with Norfolk County Council post-consent, prior to the commencement of the construction phase.
NCC29	The impacts on the water resources are assessed in the Environmental Statement Chapter 12 Water Resources (APP-061). Likely effects have been assessed for the construction, operation and decommissioning phases of the Scheme. The advice from the LLFA is that the application is currently incomplete due to inconsistencies and limited information provided to support the application. The application lacks information that demonstrates commitment to ensuring there is no increase in flood risk on site or elsewhere. In addition, they advise that there are a number of instances where the information provided is unclear and clarification is required to understand what is being proposed. At present, they advise that it is not clear whether the proposed development is able to manage change in surface water runoff from areas of the site without increasing flood risk either onsite or elsewhere. Therefore, further information will be required. For full comments, please see 'Appendix 1 for the LLFAs response which is attached with their full comments. Should the applicant have any queries regarding the above comments, please contact llfa@norfolk.gov.uk	The Applicant notes this comment and addresses the specific points made by the LLFA in turn below. However, the Applicant wishes to note from the outset that it does not agree with the LLFA's suggestion that the DCO Application lacks information that demonstrates commitment to ensuring there is no increase in flood risk on the Site or elsewhere, nor that it is unable to manage change in surface water runoff from areas of the Site without increasing flood risk. Accordingly, the Applicant is satisfied that the DCO Application contains sufficient and proportionate information to demonstrate that changes in surface water runoff arising from the Scheme can be appropriately managed, and that the Scheme will not result in an increase in flood risk on-site or elsewhere. The Applicant remains committed to ongoing engagement with the LLFA to resolve any outstanding points of clarification.
NCC30	Socio-economic The assessment of the socio-economic impacts of the development are set out in the ES Chapter 14: Socio-Economics (APP-063). The chapter identifies and proposes measures to address the potential impacts and likely significant effects on Socio-Economics, during the construction, operational and maintenance, and decommissioning phases. It concludes that there will be no significant adverse effects.	The Applicant agrees with this comment.
NCC31	The Applicant has estimated, taking the net direct and net indirect jobs together, that the Project is expected to support 1,145 net additional jobs during the Construction Phase (extending over a twenty-four month period), with between 285 and 575 of these being taken by local residents. An outline Employment, Skills and Supply Chain Strategy (oESSCS) has been prepared which sets the Applicant's strategy for promoting competition, innovation, and skills in relation to the Development Consent Order (DCO) Application for the construction, operation, maintenance, and decommissioning of The Drovers Solar Farm. The oESSCS builds on the Preliminary Employment and Skills Strategy (PESS) delivered as part of the PEIR. The oESSCS outlines the potential workers, skills, equipment, and services required to deliver the Scheme, together with the measures required to engage relevant stakeholders. A detailed Employment, Skills and Supply Chain Strategy (ESSCS) will be prepared and submitted in accordance with the oESSCS prior to the commencement of construction activities, to be secured by a requirement (Requirement 18) in the draft Development Consent Order.	The Applicant agrees with this comment.



Reference number	Representation	Applicant response
	A concern at the PIER stage was that the Environmental Impact Assessment (EIA) needed to assess the wider economic benefits arising from the above development both in terms of the Project coming forward on its own and in combination with other major energy projects in the area, particularly the adjacent High Grove Solar Farm project. ES Chapter 14 includes a cumulative effects assessment that identifies that High Grove Solar Farm and East Pye are not likely to coincide with construction of the Drovers Solar Farm as their construction phases are expected to be completed before the construction of The Drovers Scheme commences, so that the cumulative impact is considered to be low in magnitude, with the cumulative effect therefore assessed as being considered not to be significant.	
NCC32	Compensation It was identified at the PIER stage that the Drovers Solar Farm Limited should provide appropriate compensation packages for those homes and businesses directly affected by both the construction works, and any long-term impacts. No explicit proposals for any such compensation packages are included in the application. It therefore remains the case that the County Council expects Drovers Solar Farm Limited to fully engage with those local communities affected by this development; and for the EIA and Environmental Statement (ES) to reflect that engagement.	The Planning Statement [APP/5.5.1] confirms that community benefits would be realised at a local level, should consent be granted for the DCO Application. For example, the oPRoWPPMP [APP-192] establishes how permissive paths proposed as part of the Scheme will be designed and implemented to improve accessibility across the Site. The oESSCS [APP-195] sets out proposals to promote local apprenticeships and training schemes, with the aim of enhancing local skills and qualification rates. The Community Benefit Fund proposed by the Applicant is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). However, it will be available to fund local projects. The Applicant will continue engagement during all stages of the Scheme, to support the development and delivery of community benefits.
NCC33	Community Benefits It was identified at the PIER stage that the Drovers Solar Farm Limited should establish a Community Benefit Fund. This should be established through either the formal DCO process or post DCO to mitigate and compensate for any local impacts to residents and businesses. No explicit proposals are included in the application for a Community Benefit Fund. It therefore remains the case that the County Council expects Drovers Solar Farm Limited to establish such a fund. Should the applicant have any queries with the above comments please contact Jan Feeney (Employment and Skills Manager) jan.feeney@norfolk.gov.uk The Applicant has estimated, taking the net direct and net indirect jobs together, that the Project is expected to support 1,145 net additional jobs during the Construction Phase (extending over a twenty-four month period), with between 285 and 575 of these being taken by local residents. An outline Employment, Skills and Supply Chain Strategy ('oESSCS') has been prepared which sets the Applicant's strategy for promoting competition, innovation, and skills in relation to the Development Consent Order (DCO) Application for the construction, operation, maintenance, and decommissioning of The Drovers Solar Farm. The oESSCS builds on the Preliminary Employment and Skills Strategy (PESS) delivered as part of the PEIR. The oESSCS outlines the potential workers, skills, equipment, and services required to deliver the Scheme, together with the measures required to engage relevant stakeholders. A detailed Employment, Skills and Supply Chain Strategy (ESSCS) will be prepared and submitted in accordance with the oESSCS prior to the commencement of construction activities, to be secured by a requirement (Requirement 18) in the draft Development Consent Order.	The Applicant refers to its responses to NCC31 and NCC32 above on these matters.



Reference number	Representation	Applicant response
	A concern at the PIER stage was that the Environmental Impact Assessment (EIA) needed to assess the wider economic benefits arising from the above development both in terms of the Project coming forward on its own and in combination with other major energy projects in the area, particularly the adjacent High Grove Solar Farm project. ES Chapter 14 includes a cumulative effects assessment that identifies that High Grove Solar Farm and East Pye are not likely to coincide with construction of the Drovers Solar Farm as their construction phases are expected to be completed before the construction of The Drovers Scheme commences, so that the cumulative impact is considered to be low in magnitude, with the cumulative effect therefore assessed as being considered not to be significant.	
NCC34	Arboriculture The impacts on trees are considered as part of the Environmental Statement Chapter 16: Other Environmental Matters (APP-065) and is supported by Appendix 16.4 Arboricultural Impact Assessment (AIA) (APP-178). The AIA provides an assessment of the potential impacts upon existing trees, groups of trees, woodlands and hedgerows. The Non-Technical Summary and (at high level) Appendix 16.4: Arboricultural Impact Assessment (AIA) has been reviewed as a desk-based exercise. NCC considers that there are foreseeable negative impacts to trees adjacent to the highway that do not appear to be considered within section 16.4 of the Environmental Statement or the AIA. Potential conflict has been identified in the following documents: 20 7.7 - The outline Construction Management Plan; 21 5.3.3 -Visibility splays will be kept clear throughout the construction activities; 22 Assessment of the impacts to trees and hedges to maintain these visibility splays must be made within the arboricultural submission and any impacts suitably mitigated or alternative construction routes used; and 23 Section 16.4 ES Appendix 9.2: Traffic Assessment indicates that vegetation removal (including removal of trees) will be required to achieve the proposed visibility splays and signage. The above impacts should be considered within the AIA (ES Appendix 16.4). If the impacts are not avoided or insufficiently mitigated then alternative access routes will need to be considered. It is assumed that trees adjacent to the highway are under the ownership of the adjacent landowner and not NCC Highways, but no checks have been made on this. It is expected that the scheme confirms tree ownership, especially where impacts are foreseeable, and to have the permission of the tree owner prior to carrying out any works to facilitate this development. Should the applicant have any queries with the above comments they should contact Tom Russell-Grant (Arboriculture and Woodland Officer) tom.russellgrant@norfolk.gov.uk	The Applicant disagrees with Norfolk County Council's assertion that there are foreseeable negative impacts to trees adjacent to the highway that have not been assessed within Section 16.4 of ES Chapter 16: Other Environmental Matters [APP-065]. ES Appendix 16.4: Arboricultural Impact Assessment [APP-178] provides a comprehensive assessment of the likely impacts on existing trees, groups of trees, woodlands and hedgerows. This assessment has been informed by, and is consistent with, the tree removal and management approaches set out on the Vegetation Removal Plan, Appendix 2 of the oLEMP [APP/7.11.1]. The need to maintain visibility splays, including the requirement for vegetation clearance and ongoing management, has been clearly identified and assessed within these documents, as well as within the oCEMP [APP/7.6.1] and ES Appendix 9.2: Traffic Assessment [APP-163]. There are therefore no unassessed or unforeseen impacts to trees arising from highway visibility requirements. The Applicant confirms that trees adjacent to the highway are under the ownership of the adjacent landowner and not Norfolk County Council Highways. The Scheme will have permission of the tree owner prior to carrying out any works to facilitate this Scheme.



Reference number	Representation	Applicant response
NCC35	As stated previously in NCC's responses to the scoping opinion, and the Preliminary Environmental Impact Report for this project, it does not consider that the proposed development will result in needless sterilisation of safeguarded mineral resources. This is due to the temporary nature of the project, the founding methods to be used for the project, and the limited areas of safeguarded mineral resources within the project boundary. NCC is pleased to note that the Environmental Statement Vol 2, Chapter 16 contains an assessment of the waste management capacity in the vicinity of the project boundary and considers the potential impacts from the waste quantities generated by the construction and operation of the project. An outline Construction Environmental Management Plan (oCEMP) has been developed based on these assessments and will be secured through the DCO. Table 19 of the oCEMP states that the re-use of materials will take place on-site wherever feasible, such as excavated soil. A Site Waste Management Plan (SWMP) will be developed as part of an Operational Environmental Plan to address waste prevention, reuse, recycling and recovery during the Operational phase, a SWMP for the construction phase will be submitted under a requirement of the DCO. NCC considers that these measures are appropriate at this stage and will comment on the details contained within the draft DCO and the requirements of the DCO at a future date. Should the applicant have any queries regarding the above comments please contact Richard Drake (Senior Planner) at richard.drake@norfolk.gov.uk	The Applicant is pleased to have reach agreement with Norfolk County Council on the impact of the Scheme on safeguarded mineral resources. The Applicant is also pleased to have reached agreement with Norfolk County Council regarding the effects of the Scheme on waste management capacity in the vicinity of the Site, the measures to control waste within the oCEMP [APP/7.6.1], and the commitment to prepare a Site Waste Management Plan (SWMP). The Applicant confirms that a detailed Construction Environmental Management Plan and a detailed Operational Environmental Management Plan, substantially in accordance with their respective outline versions (oCEMP [APP/7.6.1] and oOEMP [APP/7.8.1]), will each be submitted to Norfolk County Council as the relevant waste authority for approval, as secured by Requirements 13 and 14 in Schedule 2 to the draft DCO [APP/3.1.1].
NCC36	Norfolk Fire and Rescue Comments While the ES makes specific reference to an Outline Battery Safety Management Plan (OBSMP) which has been prepared as part of the submission; any plan will need to be formally agreed by Norfolk Fire and Rescue Service. A Requirement in the DCO on this matter should be included, which is proposed (Requirement 6). Risk control recommendations for all Battery Storage (BESS) installations should be subject to a suitable fire risk assessment and the development and production (amongst others) of the following strategies and plans: 24 A risk reduction and mitigation strategy that covers the design, construction, installation, operation and decommissioning phases of the project to minimise the impact of an incident; 25 An emergency response plan in consultation with Norfolk Fire & Rescue Service, which details site specific information regarding the hazards, locations of hydrants or stored water supplies, electrical isolators, measures to be taken during an incident and responses required post incident. Coordination should also include regular onsite training and familiarisation for operational fire service personnel; 26 An environmental impact and risk assessment must be completed. This must include firefighting water run-off including containment and treatment as necessary. Air pollution must also be considered; and 27 A transport strategy to minimise the impact of additional vehicle movements and prevent an increase in the potential number of traffic incidents, especially in largely rural settings. Where appropriate, these plans should be supported with specific fire tests. Property insurers should be involved at an early stage in discussions to agree on	The oBSMP [APP/7.14.1] details the risk reduction and mitigation strategy and this will be circulated to the Norfolk Fire and Rescue Service for consultation and comments. As the site design matures the oBSMP [APP/7.14.1] will be further developed to include details of the infrastructure to be employed and the relevant certification and testing that has been undertaken. The Emergency Response Plan will be developed once the details of the site equipment is known. This too, will be circulated to the Norfolk Fire and Rescue Service for consultation and comments. Prior to site energisation the Norfolk Fire and Rescue Service will be invited to the Site for a familiarisation and hands-on visit



Reference number	Representation	Applicant response
	a suitable fire strategy for BESS installations. The potential for both property loss and business interruption should be considered. The fire protection and mitigation strategy should be determined on a case-by-case basis, based on battery technology type, BESS site location, layout, compartment construction, system criticality, and other relevant factors. It should be multilayered and include a combination of; good design, thermal runaway avoidance, early detection, and automatic suppression. Manual fire control provision and planning, including water supplies, should be commensurate with BESS and other site fire hazards.	
NCC37	The LLFA notes the proposed development's programme, or a summary of the programme is not included within the Introduction of the report. Therefore, further information on the proposed timescales is required.	As outlined in Section 5.4 of ES Chapter 5: The Scheme [APP/6.1.2], the construction phase will be up to 24 months. The final programme will be dependent on the detailed layout design and potential environmental constraints on the timing of construction activities. As outlined in Section 5.5 of ES Chapter 5: The Scheme [APP/6.1.2], the Applicant is seeking a time-limited consent with respect to the operation of the Scheme, which will start from the final date of the construction phase of the Scheme. The operational life of the Scheme is anticipated to be 60 years. Decommissioning is expected to take between 12 and 24 months, and for the purposes of the assessment, is expected to occur after the 60-year design life of the Scheme in 2093. A requirement to decommission the Scheme is secured via a Requirement in the draft DCO [APP/3.1.1]. Paragraph 12.1.15 of ES Appendix 12.2: Flood Risk Assessment [AS-053] also states that the Scheme will have a 60-year lifespan.
NCC38	In section 2.5.18 on the Cumulative Effects Assessment Approach, the applicant states that "the cumulative effects multiple existing and / or approved developments generating additive effects which together have an increased effect on the same receptors." While this is consistent with the PINS Advice (September 2024), this definition will exclude the consideration of the cumulative effects with the proposed High Grove Solar Farm that directly surrounds this application for the proposed Drovers Solar Farm. As both schemes have a very similar programmes, they both have the potential to be constructed at a similar time but without assessing the cumulative effects on the surrounding areas. The effects on these schemes therefore should be considered in the Cumulative Effects Assessment rather than in isolation. On Figure 2.1, the LLFA notes a substantial area in the approximate area of the High Grove Solar Scheme, yet it is not mentioned in the text. It is of particular interest to the LLFA as the construction phase for each of the schemes poses significant potential for flood risk. Further information is required.	ES Appendix 2.4: Cumulative Schemes [APP-136] presents the schemes considered for assessment as part of the cumulative effects assessment within the ES. Table 2-3 of this appendix contains the details of the selected schemes and High Grove Solar (EN0110010) is the first listed scheme. High Grove Solar has been considered, as appropriate, in each of the technical chapters of the ES. As displayed in Table 2-3, there is not considered to be a temporal overlap with the construction phase for High Grove Solar with the construction phase for the Scheme. The length of the High Grove Solar construction period is stated in its Preliminary Environmental Information Report (PEIR) as 2.5 years, and the project has a grid connection starting in October 2031, as per the NESO Transmission Entry Capacity register. As detailed in paragraph 5.4.1 of ES Chapter 5: The Scheme [APP/6.1.2], the earliest time that the construction phase for the Scheme would begin is Q3 2031. In the context of the information known about the High Grove Solar construction period, and the construction phase for the Scheme, it is unlikely that the construction periods would overlap and result in potential cumulative construction effects. In addition, Section 5.15 of the oCTMP [APP/7.7.1] includes a commitment that, although <i>"the construction for the High Grove Solar Farm project is due to finish before commencement of the Scheme [...]". If the construction periods for the respective schemes overlap, a joint CTMP could be produced. This will set out construction traffic management and control measures relevant to those areas where the construction vehicle routes for the respective schemes overlap, to reduce and manage any potential cumulative effects."</i> With regard to the area of High Grove Solar Farm shown within the Order limits for the Scheme, information is provided on this within ES Appendix 2.4: Cumulative Schemes [APP-136]. Paragraph 2.3.11 states: <i>"It is further noted that part of the High Grove Solar Farm Scheme, specifically an area of the cable corridor, is currently proposed within the Order limits of the Scheme. The Applicant is actively engaging with the developer of High Grove Solar Farm. It is intended that ongoing collaboration and information sharing between the two projects will ensure that assessments are cognisant of each other and minimise likely significant effects"</i> Regarding the statement that <i>"the LLFA notes a substantial area in the approximate area of the High Grove Solar Scheme, yet it is not mentioned in the text. It is of particular interest to the LLFA as the construction phase for each of the schemes poses significant potential for flood risk. Further information is required"</i> it should be noted that paragraph 12.11.11 of ES Chapter 12: Water Resources [APP-061] states that the High



Reference number	Representation	Applicant response
		Grove Solar PEIR includes a SuDS strategy, as they are classed as major developments, to restrict surface water run-off rates and assist in the removal of sediment and pollutants from the site. The increase in flow rates is of negligible magnitude for the Scheme. Therefore, cumulative effects during the construction phase on all receptors identified in this assessment (high and medium sensitivity) are considered to be of negligible magnitude of impact and therefore Negligible adverse effect. Therefore, the ES specifically addressed the potential for increased runoff and flood risk as a result of the two developments.
NCC39	The LLFA notes that in section 2.7.4, a construction surface water management plan has not been included at this time. Furthermore, no outline surface water drainage strategy and maintenance and management plan are provided for the increase in the impermeable areas such as those associated with the grid connection infrastructure, various substations, BESS, invertors, access roads and tracks, etc.	Section 3.8 of the oCEMP [APP/7.6.1] proposes mitigation measures to reduce the runoff rates during the construction phase, from the baseline scenario. As discussed with the LLFA during a meeting in September 2025, the Scheme has Work Nos. and does not have a detailed design at this stage; therefore, ES Appendix 12.2: Flood Risk Assessment [AS-053] proposes drainage principles which will be secured through a requirement in the draft DCO [APP/3.1.1], as detailed within Section 12.4. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented). The detailed design of the SuDS network for the Scheme will be provided to the LLFA, following the issue of the DCO (if consented). ES Appendix 12.2: Flood Risk Assessment [AS-053], at paragraph 12.4.33, states that a maintenance scheme for all drainage infrastructure will be agreed with the LLFA prior to the construction phase commencing and this commitment is secured in section 2.14 of the oCEMP [APP/7.6.1].
NCC40	In section 3.2.45, the LLFA notes there is only consideration of the fluvial flood risk in relation to the site. There is no consideration of other sources of flood risk such as surface water or groundwater. Therefore, the LLFA deems this to be a lack of information and inconsistent with the requirements of NPPF (that underpins EN-1 guidance relating to flood risk) which states that any source of flood risk should be considered. Further work and information is required.	All sources of flood risk, including surface water and groundwater, are assessed within ES Appendix 12.2: Flood Risk Assessment [AS-053] and this document is therefore compliant with NPS EN-1 (2023) guidance.
NCC41	EN-1 in section 5.8.6 states "The aims of planning policy on development and flood risk are to ensure that flood risk from all sources of flooding is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to steer new development to areas with the lowest risk of flooding." However, in section 4.3.25 and section 3.2.45 of the ES, it is clear that only the fluvial sources of flood risk have been considered rather than all sources of flood risk such as surface water and groundwater. Further work and information is required. In Table 4-2, the LLFA notes the applicant has a commitment for the Standalone Conversion Unit and / or Integrated Conversion Units to outside of the surface water flood risk within Field 29. However, it is noted there is no commitment to keep the surface water drainage features that would be associated with each of the impermeable areas for these units would also be outside of the surface water flood risk areas. Further information is required.	All sources of flood risk, including surface water and groundwater, are assessed within ES Appendix 12.2: Flood Risk Assessment [AS-053] and this document is therefore compliant with NPS EN-1 (2023) guidance. ES Chapter 3: Order limits and Context [APP/6.1.2] and ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] are only intended to provide a summary of factors considered within the site selection process. Paragraph 4.7.9 of the Design Approach Document [AS-009], describes the risk of surface water flooding across the Site and that it is "<i>localised, confined to a small topographical depression in the northern part of the Site (Fields 29 and 30); and an area near Fincham Drove</i>". Section 12.2.44 to 12.2.55 of the ES Appendix 12.2: Flood Risk Assessment [AS-053] outlines how the Scheme has been sequentially designed to avoid flood zones and pluvial pathways, where possible, or mitigate the Scheme through design. Examples of surface water drainage features associated with the impermeable areas are shown in Plate 12-33 of the ES Appendix 12.2: Flood Risk Assessment [AS-053]. The conversion units will be placed outside of surface water flood risk areas and surface water drainage features will surround these impermeable areas. Therefore, the drainage features will also be outside of the surface water flood risk areas.



Reference number	Representation	Applicant response
		An example of the drainage features to serve conversion units is shown on Plate 12-33 of ES Appendix 12.2: Flood Risk Assessment [AS-053] i.e. the drainage feature is immediately adjacent to the unit and as such will be outside pluvial flow pathways.
NCC42	The LLFA is aware the applicant is still developing their design approach. The LLFA notes in Table 5-1, the potential need to use ballast slabs in some areas where driving the mounting pole into the ground is not possible. The size of the slabs has not been indicated for each of the proposed PV array options in Appendix 5.1 Plate 2. In section 5.3.13, the applicant indicates that tracker panels that would need to use concrete feet would be reduced to the 3.5m high panel. An image in Plate 4 shows the concrete feet for fixed panels rather than tracker panels. It is also notable that no vegetation is present beneath the fixed panels. The LLFA notes that should the ballast slabs be required then the surface water runoff from the ballast slabs would need to be attenuated due to the increase in impermeable area that is associated with them. Further information is likely to be required.	As outlined in paragraph 12.3.41 of ES Appendix 12.2: Flood Risk Assessment [AS-053], in areas of the Site where concrete feet may used as the Mounting Structures, active measures such as berms or swales will be considered to slow the flow of surface water run-off as part of construction SuDS, which could be retained for the operational phase of the Scheme. The image in Plate 4 of concrete ballast feet is illustrative only, and therefore dimensions are not provided within the DCO Application. Grassland is proposed to be sown beneath the Solar PV Arrays as outlined within the oLEMP [APP/7.11.1].
NCC43	In Table 5-1 and in sections 5.3.17 to 5.3.22, the LLFA notes the increase in impermeable area associated with the integrated convertor units and the switch rooms and the Standalone Conversion Units. However, there is no mention of sustainable surface water management for these structures. The LLFA in accordance with NPPF requires there to be no increase in flood risk from the proposed development on site or elsewhere. On review of the proposed design on Appendix 5.1 Plate 6, the incomplete typical proposed design details are provided. The design drawings do not currently contain any information about the materials involved. There are also letters 'A', 'B' and 'C' marked on the drawing but with no indication of what they relate to. Further information is required.	The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (as consented). As outlined in Section 12.5 Ancillary infrastructure of ES Appendix 12.2: Flood Risk Assessment [AS-053] gravel filter drains will be used around the perimeter of the inverter and conversion units to capture any surface water runoff generated from the small introduction of impermeable areas. The filter drains will infiltrate into the ground to mimic the existing baseline scenario. Detailed drainage design is secured through Requirement 11 of the DCO and needs to be approved by the relevant planning authority in consultation with the Environment Agency and Anglian Water Services Limited or its successor in function as the relevant water undertaker prior to the construction phase. The Applicant notes the Council's comment that <i>"On review of the proposed design on Appendix 5.1 Plate 6, the incomplete typical proposed design details are provided"</i> – the Applicant considers the word <i>"incomplete"</i> to be a typographical error in this comment, which should instead read <i>"the indicative typical proposed design details are provided"</i>. Therefore, the subsequent criticism from Norfolk County Council that <i>"the design drawings do not currently contain any information about the materials involved"</i> and that <i>"there are also letters 'A', 'B' and 'C' marked on the drawing but with no indication of what they relate to"</i> has been addressed at Deadline 1 by the Applicant via adding a key for the labels at Plate 6 of ES Appendix 5.1: Illustrative Technical Information [APP/6.4.2].
NCC44	The LLFA notes that in Table 5-1 and in the description of both the Customer Substation (sections 5.3.33 to 5.3.36) and the National Grid Substation (5.3.37 to 5.3.48), the management surface water runoff has not been discussed. In Table 5-1, the applicant focuses on the foundations supporting the onsite infrastructure and does not discuss the formation of a consolidation platform for the wider area of the substations. Due to the nature of the platform and the plinths for foundations construction, it is understood to be an impermeable area that would have an increased rate of surface water runoff. The LLFA in accordance with NPPF requires there to be no increase in flood risk from the proposed development on site or elsewhere. Further information is required.	The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. This will ensure surface water flood risk will be managed at the BESS, National Grid Substation and Customer Substation during temporary and permanent phases. The detailed design of the SuDS network for the Scheme will be provided to the LLFA, following issue of the DCO (if consented). As discussed with the LLFA in a meeting in September 2025, the whole area for Work Nos. 2 – 4 was assessed as impermeable (with a Cv value of 1.0) for the purposes of the outline drainage calculations presented in Section 12.4 BESS and Substations Surface Water Management of ES Appendix 12.2: Flood Risk Assessment [AS-053]. As such, the assessment of the volume of attenuation required for Work Nos. 2 – 4 is conservative and will be refined once the detailed design of the Scheme is available.



Reference number	Representation	Applicant response
NCC45	Table 5-1 and sections 5.3.23 to 5.3.32 provides a description of the proposed BESS facility. However, there is no discussion on the surface water runoff management that is required. The LLFA notes that both on this component and the other components there has been no mention of surface water drainage and attenuation to prevent an increase in surface water flood risk. In Table 5-1, the applicant focuses on the foundations supporting the onsite infrastructure and does not discuss the formation of a consolidation platform for the wider area of the BESS equipment. However, the BESS would require a levelled area (or platform area) to be constructed to facilitate the development. It is considered to be an increase in the impermeable area that would result in an increase in surface water runoff. Furthermore, Table 5-1 also identifies the need for permanent access roads which have not been considered as an impermeable area in relation to the proposed development. While it is acknowledged the proposed development is at an early stage in the design development, there should be a commitment to the management of surface water flood risk and the provision of suitable space for appropriate surface water drainage features to demonstrate there are measures in place to prevent an increase in flood risk. Further information is required. Again, in relation to the proposed National Grid Substation and the Grid Connection infrastructure (sections 5.3.37 to 5.3.48), there has been no mention of the surface water management arrangements to ensure there is no increase in flood risk onsite or elsewhere during either temporary or permanent phases. Further information is required.	The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. This will ensure surface water flood risk will be managed at the BESS, National Grid Substation and Customer Substation during temporary and permanent phases. Paragraph 12.4.17 of ES Appendix 12.2: Flood Risk Assessment [AS-053] states that SuDS features have been sized to accommodate the 1% AEP +40% CC allowance. Annex C of the ES Appendix 12.2: Flood Risk Assessment [AS-053] shows there is provision for suitable space north of the National Grid Substation for an appropriate surface water drainage feature to prevent increased flood risk should the whole Work Nos. including BESS, National Grid Substation and Customer Substation be impermeable (worse-case scenario). It will be made clear that there is suitable space for an appropriate surface water drainage feature to prevent increased flood risk within the Flood Risk Assessment at a future Deadline. As discussed with the LLFA in a meeting in September 2025, the whole area for Work Nos. 2 – 4 was assessed as impermeable (with a Cv value of 1.0) for the purposes of the outline drainage calculations presented in Section 12.4 12.4 BESS and Substations Surface Water Management of ES Appendix 12.2: Flood Risk Assessment [AS-053]. Drainage measures to prevent the increase in surface water runoff are outlined within Table 7 of the oCEMP [APP/7.6.1] and include the use of swales and drainage ditches adjacent to the access tracks, all of which is secured via a requirement in the draft DCO [APP/3.1.1].
NCC46	In relation to the proposed site access, while the existing accesses may be used, there may also be a need to create new access points (sections 5.3.58 to 5.3.60). However, there has been no mention of the surface water management arrangements to ensure there is no increase in flood risk to the existing road or elsewhere. It is worth noting that any improvement works to existing access tracks would be considered as potentially increasing the impermeable area. In sections 5.3.66, the LLFA notes a very limited consideration of the possible need to include surface water drainage features alongside the proposed access tracks but notes the lack of commitment to managing surface water runoff. In relation to a large number of the preceding concerns raised by the LLFA about the lack of surface water management, the LLFA notes the applicant indicates that compacted gravel could be used on a couple of occasions. The LLFA considers the platforms from the BESS, substations, various pieces of onsite infrastructure (such as the convertor units / switch rooms / standalone equipment) and access tracks to have an impermeable area associated with them. For the platforms and access tracks the LLFA considers these areas impermeable due to the proposed materials and need for the materials to be compacted to such an extent that prevents them from being considered as permeable. From a drainage perspective, the more open the grading is considered better for drainage, while from vehicle running and structural platform perspective, a more dense grading is desired. The denser the build-up, the slower the rate of that water can permeate the surface and is likely to flow over the top of it, particularly if the fines happen to be compacted into the surface. For example, Type 1 material is not a porous surface and depending on the age and compaction then the surface could be as smooth and impermeable as concrete. While a Type 3 material is more open graded and more porous than a Type 1 material but is not completely permeable when compacted. Therefore, it is not possible to consider the BESS platform, various substation platforms and access	Section 5.3.66 of ES Chapter 5: The Scheme [APP/6.1.2] states “Where drainage is required a ditch or a swale may be located downhill of the internal access track to control any potential for surface water run-off.” As outlined in Section 12.3 of ES Appendix 12.2: Flood Risk Assessment [AS-053] access tracks will be served by trackside drainage ditches. Along the access tracks, drainage channels on the down-slope would shed track run-off to adjacent rough ground approximately every 30m, to attenuate flow and allow natural filtration to remove sediments. In areas within 50m of a flow or where cross-slopes exceed 1 in 20, drainage channels will be bunded and outflow will be monitored daily in areas with on-going construction activity. Similarly, the oCEMP [APP/7.6.1] commits permanent swales and drainage ditches adjacent to access tracks As such, the control of runoff from access tracks is secured via the draft DCO [APP/3.1.1]. Regarding other impermeable areas such as Work No. 2 (BESS), the Scheme does not have a detailed design at this stage. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. This will ensure surface water flood risk will be managed at the BESS, National Grid Substation and Customer Substation during temporary and permanent phases. The detailed design of the SuDS network for the Scheme will be provided to the LLFA, following issue of the DCO (if consented). As discussed with the LLFA in a meeting in September 2025, the whole area for Work Nos. 2 – 4 was assessed as impermeable (with a Cv value of 1.0) for the purposes of the outline drainage calculations presented in Section 12.4 12.4 BESS and Substations Surface Water Management of ES Appendix 12.2: Flood Risk Assessment [AS-053]. As such, the assessment of the volume of attenuation required for Work Nos. 2 – 4 is conservative and will be refined once the detailed design of the Scheme is available.



Reference number	Representation	Applicant response
	tracks as permeable. A viable drainage strategy is required to demonstrate that adequate space is available to prevent an increase in flood risk from the proposed development both onsite and elsewhere. Further information is required.	
NCC47	In section 5.3.79, the applicant states "If plots cannot be created in a given year, for example, due to crop rotation, the land will be managed in a way that remains suitable for Skylarks, such as organic set-aside." It is not clear what 'crops' would prevent the inclusion of skylark plots or whether the pig rearing activities is included in the 'crops' considered as preventing the inclusion of skylark plots. Further information is required.	In order to provide appropriate compensation and suitable nesting opportunities for this species, Skylark Plots must be provided within fields under crop rotation to be suitable (e.g. cereal crops) (ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]). Provision of Skylark plots within other crops (e.g. root vegetables, Oil-seed Rape), or indeed within pig rearing fields, would not provide suitable conditions for this species and accordingly do not provide appropriate compensation. Accordingly, the compensation measures proposed take account of the need for crop rotation within the associated fields, thereby ensuring that the proposed Skylark Plots are provided within suitable cropping regimes such that they provide appropriate compensation in line with the ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149] .
NCC48	The LLFA notes the area identified for Skylark and Curlew mitigation is currently farmed through a mixture of arable crops and pig farming activities. The LLFA notes that pig farming results in a significant reduction of vegetation ground cover that leads to an increase in surface water runoff from these areas. The LLFA notes that in previous discussions the applicant indicated the removal of pig farming could be considered in providing a betterment for surface water flood risk management. However, should the pig farming activities remain as part of the agricultural activities rotating through the land, then the benefits claimed could be limited from a flood risk perspective. Clarification is required.	ES Chapter 12: Water Resources [APP-061] will be updated at a future Deadline to provide clarification on pig farming and runoff regarding benefits within the immediate catchment of the Scheme and whether rotation of the same number of livestock is proposed.
NCC49	The LLFA notes that in section 5.3.82 to 5.3.83, the applicant has indicated the potential need for new access tracks to cross ordinary watercourses. The LLFA notes there is no discussion regarding the need for an ordinary watercourse consent and takes the opportunity to remind the applicant that a consent is in addition to the NSIP DCO and will need to be in place prior to undertaking the works. Further clarification is required.	Paragraphs 5.3.82 to 5.3.83 specifies that crossings will be required for access tracks. ES Figure 12.2: Indicative Watercourse Crossing [APP-116] shows the indicative location of these crossings which are man-made ditches photographed in Plates 12-8 and 12-9 of ES Chapter 12. As outlined in section 12.8.58 of ES Chapter 12: Water Resources [APP-061] , these ditches are not connected to the wider hydrological network and are not classed as Ordinary Watercourses. Therefore, these crossings do not require Ordinary Watercourse consent from the LLFA, as stated in Paragraph 12.8.58 of ES Chapter 12: Water Resources [APP-061] .
NCC50	The LLFA notes that in appendix 5.1 there are some typical designs of some of the typical infrastructure included in this project. It is noticeable that there is no information for either of the substations or the wider BESS site platforms (although an individual battery storage unit is included). There is also no information relating to the proposed design of the 10 new pylons and additional grid connection infrastructure. A route plan is provided in Appendix 5.1 Plate 7, although due to the lack of symbology or legend on the plan combined with limited labelling, it is not possible to determine what is being shown / depicted or where this extract is in relation to the proposed development. Further information is required.	Typical BESS system layout and an indicative substation layout has been provided within ES Chapter 5: The Scheme [APP/6.1.2] at Plate 9 and Plate 11, respectively. ES Appendix 5.1: Illustrative Technical Information [APP/6.4.2] has been updated at Deadline 1 to replace Plate 7 with an updated Illustrative Grid Connection Routing drawing to include a key to aid in interpreting the drawing. Updates to this Appendix have also been made to provide indicative pylon design information. The assessment of the Scheme has been based on the Rochdale Envelope and the maximum and minimum parameters within it; should consent be granted, the detailed design of the Scheme would be undertaken in accordance with the Design Principles, Parameters and Commitments [APP/5.8.1] . Indicative information has been provided as part of the DCO Application to aid in understanding and visualising these parameters but does not form part of the design being sought for approval. Visualisations of the Scheme, both parameter based and the illustrative design, from a number of assessed viewpoints within the wider study area are included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089] , ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031] , ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages -



Reference number	Representation	Applicant response
		Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045] .
NCC51	In section 5.4, the applicant discusses the construction phase activities. Section 5.4.2 is shown as a step by step process. However, for the remaining activities discussed in sections 5.4.3 to 5.4.21, it is not clear if this is the proposed step by step process. There is also very little discussion on the schedule for constructing the proposed development with what appears to be a dependence on NGET to indicate an approximate start date for the proposed works. Furthermore, there is no mention of when surface water management systems would be constructed or if they are even associated with each of the works items discussed. The LLFA considers there is the potential for an increase in surface water flood risk as there is no indication of either temporary or permanent surface water management infrastructure being included, yet a discussion on items such as security fencing is included. While in Figure 5.1 the applicant is able to indicate the location of the extensive new access road network within the site and in Figure 5.2 the applicant is able to depict the potential locations of the temporary hoarding. In section 5.4.32 to 5.4.35, the applicant provides an overview of the construction site compound area, although there is no mention or consideration of the space required for surface water management structures. In section 5.4.36, "runoff and drainage" is mentioned as a bullet point within the outline Construction Environmental Management Plan (oCEMP). This is then elaborated on in section 5.4.54 which indicates the surface water management arrangements "will be further developed and set out within a Water Management Plan (WMP) to be included within the detailed CEMP." This implies that as yet surface water management structures have not been included within the proposed design. Later in the operation maintenance section (in section 5.5.21), the applicant confirms that "The detailed operational drainage design would be carried out pre-construction with the objective of ensuring that drainage of the land to the present level is maintained." It is not clear from this statement whether this means the discharge of the flows from the site would be restricted to the greenfield runoff rate or whether the land drainage arrangement would remain undisturbed. Further information is required to make this clear. The remaining statements in section 5.5.21 to 5.5.23 indicate that surface water runoff from the proposed development is yet to be considered and has not been allowed for in the current layout provided in the proposed development plans. Therefore, the LLFA remains concerned there is a potential for an increased flood risk. Further information is required.	Measures to manage surface water are outlined in Table 7 of the oCEMP [APP/7.6.1] which states that a detailed surface water drainage strategy will be prepared prior to construction of the Scheme. Drainage from the Site will include elements of Sustainable Drainage Systems (SuDS) design, where appropriate, such as at temporary Construction Compounds, BESS, Customer Substation work areas. As such, construction phase SuDS are secured in the draft DCO [APP/3.1.1]. As outlined in Appendix 12.2: Flood Risk Assessment [AS-053], surface water will be attenuated to the 1 % AEP + 40 % climate change allowance event and will utilise infiltration to ground rather than throttled discharge to a watercourse. Regarding "The remaining statements in section 5.5.21 to 5.5.23 indicate that surface water runoff from the proposed development is yet to be considered and has not been allowed for in the current layout provided in the proposed development plans", Appendix 12.2: Flood Risk Assessment [AS-053] provide an estimate of the volume of surface water required to attenuated for Work Nos. 2 to 4, assuming a worst-case scenario where the whole work area as impermeable, as discussed with the LLFA in a meeting in September 2025. As such, the assessment of the volume of attenuation required for Work Nos. 2 – 4 is conservative and will be refined once the detailed design of the Scheme is available and is secured through a requirement of the draft DCO [APP/3.1.1].
NCC52	In Figure 5.2, the applicant has prepared a plan to identify the key areas of the proposed development in the construction phase. However, the plan is difficult to interpret as the symbology for the Solar PV site and "siting zones for temporary construction compound for solar PV, customer substations and BESS" merge into each other. There is no indication of the temporary haul roads and their approximate locations, yet the indicative location for potential hoarding is able to be provided on the local road network. Furthermore, not all the features depicted on the construction plan are given in the symbology key (such as the mustard-coloured line running north to south on field 27). Further work and information is required.	ES Figure 5.2: Construction Masterplan [APP/6.3.1] has been updated at Deadline 1 to change the symbology and provide greater clarity between Solar PV site and siting zones for temporary construction compound for solar PV, Customer Substation and BESS. The Applicant would construct and utilise the (operational) access tracks in order to provide access throughout the Site during the construction phase; the oCEMP [APP/7.6.1] has been updated at Deadline 1 to clearly state this. The detailed construction methodology will be confirmed by the appointed contractor and will be substantially in accordance with the oCEMP [APP/7.6.1] as set out in Requirement 13 of draft DCO [APP/3.1.1]. The locations for the temporary hoarding have been provided to secure the mitigation required identified within ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176].



Reference number	Representation	Applicant response
NCC53	In relation to Figure 5.1 for the proposed concept masterplan, there is no indication of where the existing watercourses are located in relation to the proposed development. However, the existing woodland is shown on the plan. The plan does show the extensive new access track network proposed to service the proposed development, although it is not clear which of the access points will cross watercourses or will provide new access points onto the site. This is of interest to the LLFA who are aware that new access points onto the highway could act as a flow route for surface water into the existing road network if appropriate surface water management arrangements are not included within the proposed development. Further information is required.	ES Chapter 12: Water Resources [APP-061] and ES Appendix 12.2 Flood Risk Assessment [AS-053] present the baseline conditions at the Site related to existing watercourses. The final location of access tracks is not proposed as part of the DCO Application and will be the subject of the detailed design stage; however, ES Figure 12.2: Indicative Watercourse Crossing [APP-116] provides indicative locations of man-made ditch crossings based on the indicative Access Tracks locations provided in ES Figure 5.1: Concept Masterplan [AS-022]. There are no Ordinary Watercourse crossings proposed as part of the Scheme ES Figure 12.1: Ephemeral Ditches [APP-115] shows the blind ditches within the Order limits. The oCEMP [APP/7.6.1] states that channel drains will be installed at site entrances to prevent surface water leaving Site to the public highway.
NCC54	The LLFA notes that in section 5.5.27 to 5.5.28, the applicant has indicated a "worst case" where vegetation is assumed to be managed with machinery and that the use of grazing by sheep will be "explored". The LLFA notes that the presence of livestock on the site could lead to localised patches of bare ground and compaction resulting from animal movements and sheltering. This could lead to some localised areas of increased surface water runoff and care should be given in the consideration of surface water runoff when "exploring" the use of sheep grazing on the site. Further consideration and information is required.	Paragraph 12.8.166 of ES Chapter 12: Water Resources [APP-061] states that using sheep for vegetation maintenance on solar farms can assist in improving biodiversity and soil activity, if grazing pressure is not too high. Sheep can create micro-climates with their hooves in the soil (through compaction), spread seeds with their wool, and spread diaspores from some plants with their hooves and faeces. Therefore, there needs to be a balance between biomass management and livestock stocking rate to ensure the grass mix is maintained and soil cohesion is managed, especially following periods of heavy or prolonged rainfall. Management of vegetation within the Order limits is set out in the oLEMP [APP/7.11.1] . As vegetation becomes fully established under the PV panels there is likely to be a decrease in surface water runoff rates and a reduction in the potential for sediment and agricultural chemicals (e.g. phosphates and nitrates) to transfer into the wider hydrological catchment compared to the baseline scenario.
NCC55	In section 5.5.32, it is clear to the LLFA that there will be ongoing maintenance and infrastructure replacement activities that will require a construction compound to support these works such as the replacement of the 393 BESS units roughly every 10 years and the Solar PV units (covering the 608 hectare development) every 30-40 years. The Solar PV panels are anticipated to be replaced over a maximum 12 to 24 month period. It is noted that the worst case time period is not dissimilar to the construction period of the Solar PV panels element of this development. Therefore, as the initial construction phase requires considerable areas of temporary construction compounds and hardstanding it would be reasonable to assume a similar amount of temporary infrastructure would be needed for the replacement of the BESS and PV units. However, in the ES, it is not clear at this time whether the same temporary construction facilities would be expected for the interim replacement activities and where they would be located or whether the compound area would be left in situ to reduce the environmental disruption and associated carbon emissions for constructing and dismantling these compounds so frequently. Further information is required.	The temporary Construction Compounds associated with the construction phase are required to facilitate the entirety of the construction works, which includes but is not limited to groundworks, foundations, mounting structures, access tracks, cabling, fencing, and permissive paths. None of these works are required during the replacement period. During the replacement period, the components will be delivered and replaced on a rolling basis to minimise the amount of energy generation loss experienced by the Scheme, in accordance with the thresholds set out within the oOTMP [APP/7.9.1]. The oOEMP [APP/7.8.1] has been updated at Deadline 1 to clearly state this. It is not anticipated that all of the replacement components will arrive at the start of this period, require bulk storage, and then be distributed around the site over the remainder of the replacement period. It is anticipated that the suitable parts of the BESS compound, Customer Substation, as well as access tracks and working areas around the edges of the Solar PV site will be utilised, as required, for ad-hoc storage of replacement components during the replacement period.
NCC56	In relation to the decommissioning, the applicant has stated that the belowground infrastructure would be removed to a depth of 1.2m (section 5.6.3). However, section 5.3.54 indicates that some shallow infrastructure (such as the fibre communication chambers which are 1.5m deep, or the joint bays with their concrete pads which are 3m deep) would remain in the ground. However, later in section 5.6.6 it is indicated that the jointing bays would be left in place. The LLFA requires clarification whether the lower part of these structures is proposed to remain in the ground or whether it is to be removed. Furthermore, the applicant has not indicated the removal of the access track as part of the decommissioning process. As these access tracks are only provided to serve the maintenance of the development they	The Applicant has committed to foundations and other below ground infrastructure, which includes communication chambers and joint bays, to be cut to 1.2m below the surface to enable future ploughing as set out in paragraph 5.6.3 of ES Chapter 5: The Scheme [APP/6.1.2] and within the oDS [APP/7.10.1]. The reference in paragraph 5.6.6 to jointing bays remaining in place is in relation to any remaining elements of the jointing bay after it has been cut down. The Applicant has submitted an oDS [APP/7.10.1] which sets out the mitigation measures to be included within the detailed Decommissioning Strategy. The oDS [APP/7.10.1] commits the foundations and other below ground infrastructure will be dug and buried respectively to 1.2m below the surface to enable future ploughing. This is secured through Requirement 20(4) of the draft DCO [APP/3.1.1] which sets out that the decommissioning strategy must be substantially in accordance with the oDS [APP/7.10.1] and must include a



Reference number	Representation	Applicant response
	should be removed including any associated culverting. Further clarification and information is required.	timetable for its implementation. Paragraph 2.1.5 of the oDS [APP/7.10.1] has been updated to clarify that ducting and jointing bays would be cut down to 1.2m. At the point of decommissioning, the Applicant will discuss with the Landowner the extent of access tracks that the Landowner wishes to retain to facilitate ongoing management of the land after the completion of decommissioning phase. Any access tracks that are not required to be retained by the landowner would be removed during the decommissioning phase of the Scheme.
NCC57	The LLFA that section 12.5.14 to 12.5.18 considers the FRA in Appendix 12.2 to chapter 12 of the ES. The LLFA has concerns about the lack of information and clarity in the FRA (see subsequent response comments below) and these concerns will need to be addressed before these sections can be updated appropriately. Further work is required.	The Applicant has responded to each point raised by the LLFA in subsequent rows.
NCC58	The LLFA notes that section 12.5.18 states that the FRA concludes how the scheme complies with local planning policy, the BC Level 1 Strategic Flood Risk Assessment (SFRA) Update and section 5.8 of NPS EN-1. On review of the FRA, the LLFA did not observe a demonstration of how this scheme complies with these local and national policies or the relevant SFRA. Therefore, it is not clear to the LLFA which this information is held as it is not where the ES indicates it to be. Further information is required.	ES Appendix 12.2: Flood Risk Assessment [AS-053] is clear that the Scheme is compliant with NPS EN-1 (2023), which requires, in reference to the National Planning Practice Guidance, that the Sequential Test is undertaken to steer new developments to areas with the lowest risk of flooding. Additionally, as outlined in paragraph 5.8.15 of NPS EN-1 (2023), the minimum requirements for FRAs are that they should be proportionate to the risk and appropriate to the scale, nature and location of the project. Importantly, the FRA identifies and secures opportunities to reduce the causes and impacts of flooding overall during the lifetime of the Scheme, therefore being compliant with Paragraph 5.8.16 of NPS EN-1 (2023). ES Appendix 12.2: Flood Risk Assessment [AS-053] fully complies with the Breckland District Council Level 1 SFRA, and the Breckland Local Plan Policy ENV 09 as the Scheme has been located appropriately in Flood Zone 1, applies the Sequential Test correctly, exceeds climate change allowance expectations, addresses surface water flood risk with bespoke modelling, incorporates SuDS, RSuDS and Natural Flood Management in line with SFRA objectives, demonstrates no increase in flood risk elsewhere and refines groundwater risk using detailed site data.
NCC59	In Table 12.2 the applicant confirms the criteria for the sensitivity of the identified receptor. The LLFA requires clarification as in the "High" sensitivity section a description of "residential and industrial receptors in Flood Zone 1 our located outside pluvial flow pathways". It is not clear what this is meant by this statement and it is assumed there is a typo in this text. Clarification is required.	Table 12.2 of ES Chapter 12: Water Resources [APP-061] will be updated to state " <i>residential and industrial receptors in Flood Zone 1 are located outside fluvial flow pathways</i> " at a future Deadline. Increasing flood risk to residential and industrial receptors that have currently no flood risk is a high sensitivity.
NCC60	In Table 12.2, the LLFA notes there is no mention or consideration of surface water flood risk in the medium, low or negligible areas. Furthermore, the LLFA notes that in the Negligible area the description lists "Areas classes as Flood Zone 1", which was also indicated in the "high" section. This duplication indicates there is likely to be an error in this Table 12.2 that requires resolving along with the lack of consistent consideration of the various areas that were identified in the "high" section. Further work is required. In Table 12.3, the LLFA notes there is no consideration of surface water runoff or flow paths. Further information is required.	The sensitivity criteria on Table 12.2 of ES Chapter 12: Water Resources [APP-061] is not exhaustive, and there is no error in the Table. There is a distinction between the two receptors referred to by the LLFA, one being residential receptors of High sensitivity and the other being land classed as Flood Zone 1 i.e. Negligible sensitivity. The Applicant notes that the Scheme incorporates several measures to ensure surface water runoff rates do not increase from the baseline scenario, such as grassland under the PV arrays and a commitment to have formal SuDS for Works No.s 2 to 4 as outlined in Sections 12.3 and 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053], and therefore has the potential to reduce rates through the implementation of SuDS and RSuDS measures.
NCC61	In Table 12.4, the applicant states that in the High Magnitude a Beneficial impact is "A decrease in the probability of flooding onsite and offsite, such as a substantial reduction in the floodplain or pluvial flood depths at conurbation level." This LLFA is unclear how this is achieved as there is no additional attenuation or storage	The wording of Table 12.4 in ES Appendix 12.2: Flood Risk Assessment [AS-053] is part of an impact-magnitude definition to determine magnitude of impact and is not a site-specific claim. This wording is an example used to show a decrease in probability of flooding offsite. The Scheme is not creating additional



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	created on site to reduce the discharge of the surface water from the proposed development area. The LLFA notes at present the FRA is not clear on whether all areas of increased impermeability will have surface water management measures to mitigate and prevent an increase in flood risk (further information in the FRA Comments section). In addition, it is not clear what is meant by conurbation level as there has been no assessment on the potential impacts on local settlements in relation to flood risk. A similar statement has also been made in the medium and low sections. Further information, clarification and work is required.	attenuation or storage that is capable of producing conurbation-scale benefits, nor is the ES Appendix 12.2: Flood Risk Assessment [AS-053] suggesting this. As the Scheme has Work Nos. and does not have a detailed design at this stage, drainage principles are proposed and will be secured through a requirement in the draft DCO [APP/3.1.1] , as detailed within section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053] . The detailed design of the SuDS network for the Scheme will be provided to the LLFA, following issue of the DCO (if consented).
NCC62	In section 12.6.66 to 12.6.68, the applicant indicates there are watercourses on the site that are disconnected from the wider watercourse network. While in section 12.6.73, a contradictory statement is made that states "The hydrological regime within the CSA is typical of lowland agricultural plains, primarily being drained by man-made ditches with slow water being transferred slowly to the wider hydrological system." Furthermore, Plates 12-8 and 12-9 are photographs showing a ditch in each. However, there is no figure marking where these ditches (or any others) are located to demonstrate they do not connect to the wider watercourse network. The LLFA Developer Guidance (section 9.1.13) provides guidance on how to evidence a connection or lack of connection to a watercourse. At present there is an incomplete evidence base to support the statement in Chapter 12. Further information is required.	As outlined in paragraph 12.8.58 of ES Chapter 12: Water Resources [APP-061] , the blind ditches are not connected to the wider hydrological network and are not classed as Ordinary Watercourses. ES Figure 12.1: Ephemeral Ditches [APP-115] shows the blind ditches which are not connected to the wider hydrological network. Therefore, these crossings do not require Ordinary Watercourse consent from the LLFA. ES Chapter 12: Water Resources [APP-061] paragraph 12.6.73 will be updated to remove reference of the ditches having a connection to the wider hydrological system at a future Deadline.
NCC63	The sections between 12.6.80 to 12.6.82 will need to be reviewed and where appropriate amended to ensure they reflect the updates to the FRA and the hydraulic modelling that are required as per the LLFA's subsequent comments on these reports. Further consideration is required.	Paragraphs 12.6.80 - 12.6.82 of ES Chapter 12: Water Resources [APP-061] are signposts to where modelling parameters and climate change projects can be found and therefore will remain unaffected by any changes made to the 2D modelling, if required.
NCC64	Informative - The LLFA notes that in section 12.7.7, the applicant states that "The Scheme will utilise existing access roads and agricultural tracks already in place". The LLFA confirms that should there be any improvement works or widening of these existing access tracks this will be considered as an increase in the impermeable areas. The LLFA notes that in section 12.7.7, there is some indication of the design parameters for any proposed bridges, however, there is no commitment to the design parameters for any proposed temporary or permanent culverts to facilitate access across ordinary watercourses. The LLFA notes the River Nar and its tributaries are ordinary watercourses in the immediate area of the site. Therefore, ordinary watercourse consents are likely to be required from the LLFA. Further work is required.	The final location of access tracks are not proposed as part of the DCO Application and will be the subject of the detailed design stage. Paragraphs 12.3.30 to 12.3.36 of ES Appendix 12.2: Flood Risk Assessment [AS-053] give drainage principles for access tracks. The detailed design of the drainage strategy will be provided to the LLFA, following issue of the DCO (if consented). The final location of access tracks, and therefore the design parameters of culverts, are not proposed as part of the DCO Application and will be the subject of the detailed design stage; however, ES Figure 12.2: Indicative Watercourse Crossing [APP-116] provides indicative locations of watercourse crossings based on the indicative Access Tracks locations provided in ES Figure 5.1: Concept Masterplan [AS-022] . As outlined in paragraph 12.8.58 of ES Chapter 12: Water Resources [APP-061] , these indicative watercourse crossing are across man-made ditches that are not connected to the wider hydrological network and therefore not classed as Ordinary Watercourses. Therefore, these crossings do not require Ordinary Watercourse consent from the LLFA. There are no further crossings proposed as part of the Scheme.
NCC65	In relation to section 12.7.9, the LLFA notes the applicant is proposing semi permeable access tracks through the use of Type 2 and 3 material. However, permeable access tracks are unlikely to be achieved due to the nature of the design and construction process involved. The LLFA would consider the access tracks constructed with Type 2 and 3 material to have a reduced impermeability although surface water runoff would continue to occur due to the need for the materials to be compacted to such an extent that prevents them from being considered as permeable. From a drainage perspective, the more open the grading is considered better for drainage, while from vehicle running and structural platform perspective, a more dense grading is desired. The denser the build-up, the slower the rate of	ES Chapter 12: Water Resources [APP-061] states that Type 2 and 3 material will be used for the access tracks, while ES Chapter 5: The Scheme [APP/6.1.2] is less prescriptive. Paragraphs 12.3.30 to 12.3.36 of ES Appendix 12.2: Flood Risk Assessment [AS-053] give drainage principles for the access tracks, based on the assumption of reduced permeability from compaction. via vehicular movements. Paragraph 12.7.12. of ES Chapter 12: Water Resources [APP-061] also confirms that access tracks will be served by trackside drainage ditches. As such, there is no inconsistency between the documents.



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	that water can permeate the surface and is likely to flow over the top of it, particularly if the fines happen to be compacted into the surface. Furthermore, during intense rainfall surface water is likely to runoff from the track as the infiltration rate of the track is unlikely to match the rainfall rate. Therefore, it is not possible to consider the access tracks new or widened as permeable and surface water management for these tracks will be necessary. The LLFA notes there is an inconsistency between the FRA and the ES reports in these approach that will also need to be resolved. Further work is required.	The detailed design of the drainage strategy to serve access tracks will be provided to the LLFA, following issue of the DCO (if consented).
NCC66	In section 12.7.12 to 12.7.13, there is a further inconsistency between the ES and the FRA. The ES indicates the only works 2 to 4 will be served by SuDs. However, in the FRA there is an inconsistent approach that does include the Works 2 to 4 but also indicates surface water drainage designs and commitments for other Works that includes the operational access tracks and construction works and access tracks. Further work is required.	Paragraph 12.7.12 of ES Chapter 12: Water Resources [APP-061] states that access tracks will be served by trackside drainage ditches and will include check dams at regular intervals, as stipulated in the SuDS Manual, to prevent the rapid transfer of water downslope. Additionally, paragraph 12.3.30 of ES Appendix 12.2: Flood Risk Assessment [AS-053] confirms that access tracks will be served by trackside drainage ditches. As such, this commitment to manage surface water from access tracks is secured via the DCO and there is no inconsistency between the documents.
NCC67	The LLFA note that in section 12.7.15, the applicant would return the land to agricultural use and remove the majority of structures including foundations to the level of 1.2m below ground level. The LLFA is not clear whether this ground level used is the pre development ground level or the finished ground levels of the development. The LLFA is also not clear whether any materials brought to site to construct a level platform for the BESS, or Substations would be removed from site so to return the site to its original topography prior to development as all this could alter the future flow regimes and result in changes to flood risk. Further information is required.	The oSMP [APP/7.13.1] sets out that all infrastructure except for the National Grid Substation and Grid Connection Infrastructure will be removed down to a depth of 1.2m from the ground level post decommissioning, accounting for any reprofiling. This will include materials brought to Site to construct a level platform for the BESS, or Substations. The oSMP [APP/7.13.1] has been updated at Deadline 1 to make this clear. The oSMP [APP/7.13.1] goes onto set out the procedures and mitigation measures to be followed for soil reinstatement during the decommissioning stage. The Applicant is required to prepare a detailed Soil Management Plan which will need to reflect weather, soil and land conditions, at the time of decommissioning, to ensure the Site is returned to its original use and condition as far as practicable, which will include consideration of its original topography. The oSMP [APP/7.13.1] has been updated at Deadline 1 to make this clear.
NCC68	In section 12.7.16, it is not clear why there is a need to retain the National Grid Substation and the Grid Connection Infrastructure after the development it served has been decommissioned. The point regarding ownership is not relevant to this process. As the applicant has confirmed they will not own the land on which the development is proposed. Furthermore, they will not own the infrastructure built specifically to facilitate the connection of their income generating assets to the transmission network. Yet the application does not provide the removal of the redundant infrastructure at the end of the proposed development's lifetime. This is not in keeping with other energy infrastructure such as the nuclear sector. Further work and consideration should be undertaken.	Section 4.2, Responsibilities of National Grid Electricity Transmission, of the Grid Connection Statement [APP-181] confirms that NGET will own and operate the new National Grid Substation and the works in connection with a connection to the existing overhead transmission electric line. ES Chapter 5: The Scheme [APP/6.1.2] confirms that the National Grid Substation, and the Grid Connection Infrastructure would remain in situ. This allows National Grid flexibility to make use of the National Grid Substation post decommissioning of the Scheme. The National Grid Substation will be built and operated by NGET and will be NGET's asset with associated infrastructure. Additionally, the National Grid Substation may be able to provide future capacity for projects once the Scheme is decommissioned, hence the Applicant has not included the removal of this infrastructure as part of decommissioning the Scheme. It should be noted that the reference to the nuclear sector is not relevant because it is informed by the Nuclear Site License Conditions 3 and 35 and the risks associated with nuclear facilities are fundamentally different to the risks associated with national grid infrastructure.
NCC69	Through the consultation summary, the applicant has continued to refer to the inclusion of SuDS within the proposed design such as on page 8 in Appendix 12.1, the applicant has stated that "SuDS measures will be designed to accommodate the 1% AEP plus a 40% allowance for climate change." However, in Chapter 5 the	In paragraph 12.2.22 of ES Appendix 12.2: Flood Risk Assessment [AS-053] it is stated that "SuDS will be proposed for Work Nos. 2 to 4 during the detailed design phase of the Scheme and designed to the 1% AEP +40% climate change event".



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	scheme description does not include SuDS or the space for SuDS. The lack of cross referencing to other documents further indicates the limited nature of this commitment. This inconsistency needs to be resolved, and the inclusion of SuDS is needed. Further work is required.	As the Scheme has Work Nos. and does not have a detailed design at this stage, drainage principles are proposed and will be secured through a requirement in the draft DCO [APP/3.1.1] , as detailed within section 12.4. The detailed design of the SuDS network for the Scheme will be provided to the LLFA, following issue of the DCO (if consented). ES Chapter 5: The Scheme [APP/6.1.2] has been updated to include reference of a SuDS design network and will be cross-referenced to the ES Appendix 12.2: Flood Risk Assessment [AS-053] at Deadline 1.
NCC70	The LLFA notes that on page 14 in Appendix 12.1, the applicant has indicated the access tracks could be retained by the landowner. Therefore, as the tracks are indicated to be permanent structures with a lifetime beyond the proposed development lifetime of greater than 60 years, these tracks and their supporting infrastructure such as the surface water drainage and culverts to cross watercourses, will need to be designed with this in mind. Should the applicant not seek to apply a more robust set of design parameters associated with a longer design life, then these structures will need to be removed as part of the decommissioning phase. This design decision will need to be made at this time as part of the DCO process as it has design implications. Further work and clarification is required.	It is yet to be determined whether access tracks will be retained by the landowner following decommissioning of the Scheme. Should the tracks be retained, then so shall the drainage ditches serving them. Given that SuDS systems are committed to being designed to the 1 % AEP + 40 % allowance for climate change, this covers the tracks existing up to 2125, which is 30 years beyond the lifespan of the Scheme. As such, the drainage network will be appropriately sized for use beyond the decommissioning phase of the Scheme.
NCC71	In relation to the assessment of all sources of flood, the ES frequently only references the strategic sources of flood risk in the early ES chapters (Chapters 1 to 5). However, in the consultation summary there is reference to other sources of flood risk being considered. Therefore, it is not clear why these sources of flood risk have not been discussed and considered in the early ES chapters as it provides an incomplete and inconsistent perspective on the scheme. Further clarification and information is required.	Flood risk from all sources is assessed in ES Appendix 12.2: Flood Risk Assessment [AS-053], which is the appropriate document to provide a comprehensive review of flood risk, rather than the introductory chapters of the ES. Similarly, ES Chapter 12: Water Resources [APP-061] provides more detail on flood risk than the introductory chapters, as it is the appropriate document to contain this information. As such, it is considered that the ES provides a complete and consistent narrative on flood risk.
NCC72	In relation to the LLFA's comments provided as a response to the ES relating to Water Resources in Table 12-2, the LLFA notes issues raised by the LLFA in relation to Chapter 5 are shown to have not been addressed in the chapter of concern. Further clarification is required to confirm why the issues were not addressed in the appropriate chapter.	ES Chapter 5: The Scheme [APP/6.1.2] has been updated to address comments made by the LLFA shown in Table 12-2 of ES Chapter 12: Water Resources [APP-061] at Deadline 1.
NCC73	The LLFA notes that in section 12.8.34, the applicant indicates there would be "overburden stockpiling (superficial geology / topsoil spoil heaps)". At present it is not clear where this material would be stockpiled and what the potential impact on surface water flood risk could be. Further information is required.	The oSMP [APP/7.13.1] states that the details relating to the location and management of stockpiled materials will be provided in the detailed Soil Management Plan. The oSMP [APP/7.13.1] provides details of how stockpiled materials will be store, handled, and maintained. As outlined in Table 11 of the oCEMP [APP/7.6.1], cut-off ditches or geotextile silt-fences, installed around stockpiles to prevent uncontrolled release of sediment and all potentially contaminated waters (for example washdown areas, stockpiles and other areas of risk for water contamination) to have separate drainage. The oSMP [APP/7.13.1] has been updated at Deadline 1 to confirm that stockpiles will be located outside pluvial flow pathways and Flood Zones 2 and 3.
NCC74	The LLFA notes that section 12.8.38 indicates that mitigation in the approximately 24 month construction phase includes the "planting and seeding with a suitable grass". It is noted by the LLFA that it would take approximately 12 to 18 months for the root base of this planting and seeding with a suitable grass to become established for flood risk benefits to be realised. Further information is required.	Paragraph 12.8.37 of ES Chapter 12: Water Resources [APP-061] outlines that seeding of the Order limits, particularly Work No. 1, would occur in advance of the construction phase. The oLEMP [APP/7.11.1] has been updated at Deadline 1 to confirm that pre-seeding will occur as part of the preliminary works for the Scheme. This will allow the grass to establish during the construction period ahead of the operation phase. The LLFA did note in a meeting in September 2025 that the use of overwinter crops / agricultural stubble could also be used as suitable vegetation establishment ahead of construction. This approach will allow flexibility for continued agricultural use of the Site ahead of the commencement of the construction phase.



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NCC75	In section 12.8.41, the applicant introduces the use of "settlement lagoons, swales and interception bunds". It is not clear at this time where these will be located and whether there is enough space available for such temporary or permanent structures due to a lack of information. Further information is required.	Settlement lagoons referenced in paragraph 12.8.41 in ES Chapter 12: Water Resources [APP-061] are construction-phase temporary features intended to control sediment during earthworks and track construction in accordance with the oCEMP [APP/7.6.1] . Swales and interception bunds may be temporary and their locations will be provided as part of the detailed design of the Scheme.
NCC76	In section 12.8.50, the applicant indicates that existing watercourse crossings would be used where appropriate. The LLFA notes that should any existing watercourse crossings require improvements due to their condition or other limitations a full and detailed design will be required in accordance with the LLFA's ordinary watercourse consenting guidance. Further information may be required in the future.	ES Figure 12.2: Indicative Watercourse Crossing [APP-116] shows the indicative locations of man-made ditch crossings based on the design information presented in ES Figure 5.1: Concept Masterplan [AS-022] . The ditch crossings are subject to the detailed design of the Scheme and do not require Ordinary Watercourse consent, as outlined in paragraph 12.8.58 of ES Chapter 12: Water Resources [APP-061] .
NCC77	The LLFA notes that in section 12.8.53, the applicant again refers to watercourse crossings over rivers. At present the LLFA is not clear where these watercourse crossings are located as the applicant has been clear there are no rivers within the site boundary and the River Nar has no proposed structures associated with the proposed development. However, as the River Nar at Castle Acre is an ordinary watercourse the LLFA has jurisdiction for the ordinary watercourse consenting in the immediate area of the proposed development, not the Environment Agency. Further information is required.	As outlined in ES Figure 12.2: Indicative Watercourse Crossing [APP-116] , the indicative location of the ditch crossings are shown crossing the man-made ditches photographed in Plates 12-8 and 12-9. These are not watercourses in the typical sense and are ditches that are not connected to the hydrological system. Therefore, these crossings do not require Ordinary Watercourse consent.
NCC78	The LLFA notes that insufficient evidence to support the applicant's statement has been provided and there is an incomplete assessment in section 12.8.65. The LLFA has raised a number of concerns in relation to the incomplete and inconsistent evidence base of the FRA and other information in the ES. Further work and review is required. The LLFA notes that in sections 12.8.139 to 12.8.146, there is no consideration or reference to the Battery Safety Management plan but rather a reference to the FRA. The LLFA would expect there to be some consideration of the BSMP and its interlinking to the FRA and the ES. Further consideration is appropriate.	The impact of sedimentation and erosion and increases in surface water runoff rates during the construction phase of the Scheme is assessed fully, in ES Chapter 12: Water Resources [APP-061] , concluding no significant effects as a result of soil compaction, taking into account the measures outlined in the oSMP [APP/7.13.1] and oCEMP [APP/7.6.1] . Paragraph 12.8.139 references the measures and procedures within the oBSMP [APP/7.14.1] as well as the containment procedure for spent fire suppressant in ES Appendix 12.2: Flood Risk Assessment [AS-053] .
NCC79	The LLFA notes the point in section 12.8.160 that identifies the presence of a rain shadow. It is not clear at this time whether this relates to the area shadowed by the solar arrays or whether this is associated to the prevailing wind direction. Clarification requested.	The reference to a "rain-shadow" within paragraph 12.8.160 of ES Chapter 12: Water Resources [APP-061] refers to the area immediately downslope of the PV Array, where rainfall once shed from the panel surface is redistributed evenly along the ground. Therefore, the same amount of ground remains available for infiltration as the pre-development scenario and is the basis for the conclusion that PV arrays do not increase surface water runoff, subject to the implementation of suitable grassland under the PV arrays. The term "rain-shadow" is not in reference to prevailing wind direction.
NCC80	In section 12.8.165 to 12.8.166, the applicant indicates the grassland around the solar arrays would be managed by sheep grazing. However, this has not previously been mentioned in the FRA, or other chapters of the ES. This is another inconsistency within the proposed development and its supporting evidence base. Further information is required.	Paragraph 5.5.28 of ES Chapter 5: The Scheme [APP/6.1.2] states that sheep grazing will be explored for management of vegetation at the Solar PV Site, with paragraph 5.5.27 stating that machinery managed vegetation represents the reasonable worst-case for assessment purposes. Paragraph 12.8.165 of ES Chapter 12: Water Resources [APP-061] states that vegetation could be managed by livestock grazing or by mechanical means, which is consistent with ES Chapter 5: The Scheme [APP/6.1.2] . Paragraph 12.8.166 provides information on the implications of sheep grazing, signposting to the oLEMP [APP/7.11.1] which provides management information related to sheep grazing, if this is used as a means of vegetation management during the operation phase. Paragraph 12.3.26 of the ES Appendix 12.2: Flood Risk Assessment [AS-053] states that the grassland will be managed through an initial and long-term management plan as outlined in the oLEMP [APP/7.11.1] . As such, the ES Appendix 12.2: Flood Risk Assessment [AS-053] takes cognisance that the grassland will



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		be managed by either grazing or mechanical means and promotion of managed grassland will prevent surface water from the drip line from compacting the ground and therefore limit the potential for drilling and soil mobilisation.
NCC81	In Table 12-20, there is no consideration or mention of surface water runoff. This is inconsistent with the content of the chapter 12 and is considered as an incomplete assessment. Further work is required.	Table 12-20 of ES Chapter 12: Water Resources [APP-061] includes a summary of effects for all water resources discussed within the Chapter. The table will be updated at a future Deadline to confirm that effects associated with increased runoff are negligible.
NCC82	In section 12.1.1, the LLFA notes that Works No. 6 and No. 7 have not been considered in the FRA. Both these works contain significant areas of impermeable surfaces. Works No. 6 contains amongst other things the "internal access tracks and improvement, maintenance and use of existing private tracks; access arrangements" and "earthworks; drainage and irrigation infrastructure and improvements to existing drainage and irrigation systems". While in Works No. 7, "Temporary construction and decommissioning compounds / laydown areas within the Solar PV Site and works associated with these comprising areas of hardstanding; car parking; site and welfare offices and workshops", and "area to store materials and equipment; site drainage and waste management infrastructure (including sewerage)". Therefore, it is not clear why these activities and areas of work have been excluded from consideration in the flood risk assessment. The LLFA is concerned the flood risk assessment is incomplete. Further work and information is required.	All access tracks and laydown areas will be served by SuDS, regardless of Work No. The oCEMP [APP/7.6.1] provides a clear commitment that temporary construction compounds will be served by SuDS.
NCC83	In section 12.1.11, the applicant makes reference to three other solar farms. Cleve Hill, a 373MW facility in Kent, where the solar panels form a roof like structure that prevents daylight and surface water reaching the ground in a manner that does not appear to mimic the existing natural processes. This approach is not similar to the proposed approach at The Drovers. Mallard Pass Solar Farm, a smaller 240 MW facility, that has just been consented but is not built and the Great North Road Solar Road, 800 MW facility, that is yet to be determined as it is still going through the examination process. These projects are not considered to be as comparable to The Drovers scheme as the FRA has stated. The FRA has also overrepresented the stage at which the Great North Road Solar Farm scheme is at as the FRA (dated November 2025) states "both the Examining Authority and Secretary of State were content with the approach adopted in the assessment methodology." However, as one of the sites is still in examination it is not possible to determine that at this time. Clarification and further work is required.	Paragraph 12.1.11 of ES Appendix 12.2: Flood Risk Assessment [AS-053] references other nationally significant solar projects only to illustrate the use of professional judgement and the types of methodologies that have been accepted within the DCO process. The author of the ES Appendix 12.2: Flood Risk Assessment [AS-053] has extensive experience is the assessment of solar farms of varying scale and has provided onsite advice to a number of solar farm operators to remediate drainage issues during and post-construction. It is noted that the LLFA recognise that the consented schemes differ in scale and design from the Scheme; however, the reference to these schemes was to the established approaches to flood risk assessment for large-scale solar developments. At the time of preparing the ES Appendix 12.2: Flood Risk Assessment [AS-053] in November 2025, it was understood that the assessment methodology approach for Great North Road Solar and Biodiversity Park had not been disputed during examination.
NCC84	In section 12.1.16, the LLFA notes the customer substations are not listed as being in the items with a 60 year lifespan. This is inconsistent with other statements and requires clarification. Further information is required.	ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated at a future Deadline to make reference to the Customer Substation as a component of the Scheme with a 60 year lifespan.
NCC85	The LLFA notes that in section 12.1.18 for "Pluvial", the applicant has not justified or explained the selection of the 40% allowance in the same level of detail as the fluvial allowance. The subsequent section then discusses allowances for "SuDS" (section 12.1.19 to 12.1.21), although this is not clear how or why the developer has applied different climate change allowances for the management of the same surface water runoff as SuDS are used to manage pluvial flood risk. Further work and clarification is required.	As the Scheme will have an operational lifespan of 60 years, the Scheme is required to account for a 40% pluvial allowance which is referenced in paragraph 12.1.18 of ES Appendix 12.2: Flood Risk Assessment [AS-053] . This relates to the recommended upper-end uplift for peak rainfall intensity guidance for the North West Norfolk and Cam & Ely Ouse Management Catchments for the 2070 epoch as set out in the Environment Agency's guidance for peak rainfall intensity. Paragraph 12.1.20 of ES Appendix 12.2: Flood Risk Assessment [AS-053] outlines that SuDS structures will be designed to the 1% AEP + 40% climate change allowance event, corresponding to the Upper End Allowance for the 2070 epoch, and in accordance with Paragraph 13.1.5 of the Norfolk LLFA Statutory



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		Consultee Guidance (Document Version 7.3, April 2025), which is more conservative than the 30% uplift suggested by the LLFA in a meeting in September 2024.
NCC86	The LLFA further notes that paragraph 006 of NPPG for Flood Risk and Coastal Change states "The lifetime of a non-residential development depends on the characteristics of that development, but a period of at least 75 years is likely to form a starting point for assessment." While the LLFA appreciate the developer is proposing a 60 year operational phase that covers the majority of the proposed development's lifetime, it does not cover the whole lifetime as the construction and decommissioning phases have not been included. Further work and clarification is required.	Paragraph 12.1.20 of ES Appendix 12.2: Flood Risk Assessment [AS-053] outlines that SuDS structures will be designed to the 1% AEP + 40% climate change allowance event, corresponding with development with a lifetime between 2061 and 2125, hence the use of the 2070 epoch Upper End Allowance is conservative and covers all phases of the Scheme.
NCC87	In section 12.1.23, the applicant references to EN-1 paragraph 5.8.15, which they indicate that the minimum requirements for the FRA relates solely to the proportionate approach of the FRA. However, EN-1 paragraph 5.8.15 lists another 23 minimum requirements points. These other minimum standards are not referred to or indicated in sections 12.1.23 and 12.1.24. The LLFA notes that while it is not necessary for the FRA to list these points in the report, the discussion in section 12.1.23 does appear to misinform the reader about what the minimum standards are. Further clarification would be appropriate.	ES Appendix 12.2: Flood Risk Assessment [AS-053] takes full cognisance of the requirements of NPS EN-1 (2023) and paraphrases the pertinent points of the guidance rather than reproducing the whole document. This approach is entirely consistent with FRAs of other DCO applications, such as Great North Road and the consented Byers Gill Solar Farm. Therefore, the ES Appendix 12.2: Flood Risk Assessment [AS-053] does not misinform the reader about what the minimum standards are.
NCC88	In section 12.1.26, the applicant states "elevations from 37m above ordnance datum (AOD) in the south to 85m AOD in the northeast, as shown in Plate 12-2." However, when looking at the information displayed in Plate 12-2, it is clear the lowest level is in the north and the highest elevation is in the south. The LLFA suggests the FRA is corrected to reflect the data shown. Furthermore, this section only focuses on one of the site characteristics, topography. No other characteristics were discussed or considered. Further work and correction is required.	Paragraph 12.1.26 of ES Appendix 12.2: Flood Risk Assessment [AS-053] will be corrected at a future Deadline to state "elevations from 85m above ordnance datum (AOD) in the south to 37m AOD in the northeast, as shown in Plate 12-2." Other characteristics of the Site are considered within ES Chapter 3: Order limits and Context [APP/6.1.2] and ES Chapter 12: Water Resources [APP-061] , specifically Section 12.6.
NCC89	The LLFA notes the applicant has not confirmed whether the River Nar is an ordinary watercourse or a 'main river'. On reviewing the Environment Agency's Main River map, it is noted that the River Nar in the Castle Acre area is not a main river but an ordinary watercourse. The River Nar becomes designated main river downstream from Main Road at Narborough. This information is missing from the FRA. Further work is required.	The Applicant recognises that the River Nar is an Ordinary Watercourse in the Castle Acre area. The classification of this river as an Ordinary Watercourse does not change the assessment outcome of ES Chapter 12: Water Resources [APP-061] .
NCC90	The LLFA notes the limited narrative and discussion around the watercourse along side South Acre Road. The applicant has made statements without supporting evidence. For example, in section 12.1.38 the FRA states "Observations from the site walkover show superficial cover in Fields 24 and 27 to be free draining and are unlikely to promote overland flow substantial enough to create a pluvial flow pathway, as shown in Plate 12-9 and Plate 12-10." The photos in the referenced plates show the surface of an agricultural field. There is no infiltration testing or ground investigation information provided to support the statement made. Furthermore, the FRA has not considered the combination of the fluvial and the surface water flood risk mapping information. The fluvial flood risk mapping shows the fluvial modelling of South Acre Road watercourse ends at the A1065 where the watercourse crosses the road. While the surface water flood risk mapping shows the flooding continues along the line of the watercourse upstream of the A1065. Therefore, as the new NaFRA2 mapping now prevents double accounting of fluvial flood risk in the surface water modelling, it would appear to indicate that there is a	The comment that ES Appendix 12.2: Flood Risk Assessment [AS-053] contains "limited narrative and discussion" and that the Applicant has made statements "without supporting evidence" in relation to the ordinary watercourse alongside South Acre Road is not agreed by the Applicant and does not accurately reflect the content or methodology of the ES Appendix 12.2: Flood Risk Assessment [AS-053] . ES Appendix 12.2: Flood Risk Assessment [AS-053] provides a proportionate but robust assessment of the unnamed ordinary watercourse adjacent to South Acre Road, supported by multiple lines of evidence. The watercourse is explicitly identified, mapped and photographically documented (Plate 12-7), and its topographical relationship to the Site is described in detail. ES Appendix 12.2: Flood Risk Assessment [AS-053] demonstrates that there is a clear topographical rise of approximately 5 m from the southern bank of the watercourse to the nearest areas of above-ground infrastructure, providing inherent protection against fluvial encroachment should the ordinary watercourse overtop its banks. This is not an unsubstantiated assertion but is supported by 1 m resolution LiDAR data, site walkover observations, and cross-reference to Environment Agency pluvial flood mapping, which is a more appropriate form of information when assessing watercourses which respond rapidly to heavy rainfall, rather than a constant baseflow.



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	significant amount of runoff from the agricultural fields in the area. It is necessary for evidence to be provided to support the statement in the FRA as it is contradicted by the evidence provided in the FRA. Further work and information is required.	In addition, bespoke 2D direct rainfall modelling was undertaken to assess worst-case pluvial conditions in the absence of a detailed hydraulic model for this small ordinary watercourse, confirming that flooding remains confined to the ditch corridor and does not interact with Scheme infrastructure. The Scheme avoids any encroachment, culverting or modification of the watercourse and therefore does not affect conveyance or flood storage. On this basis, the conclusions drawn in ES Appendix 12.2: Flood Risk Assessment [AS-053] are evidence-led, precautionary and consistent with national and local guidance for the assessment of minor ordinary watercourses. Paragraphs 12.1.34 and 12.3.35, along with Plate 12-7 of ES Appendix 12.2: Flood Risk Assessment [AS-053], discuss the presence and characteristics of the linear drainage ditch ('watercourse') adjacent to South Acre Road. Site observations did show freely draining sandy superficial cover, as shown in Plate 12-10 of ES Chapter 12: Water Resources [APP-061]. Additionally, as evidenced in Appendix 1 of ES Appendix 12.2: Flood Risk Assessment [AS-053], infiltration testing was undertaken in Fields 24 and 27 (three test pits in each field) to BRE 365 standard. All but one test location showed good infiltration potential, which correlates with the observations from the site walkovers, which showed sandy superficial deposits across the Order limits.
NCC91	A similar point could be made in relation to the statement made in section 12.1.39 with Plates 12-11 and 12-12, where the applicant challenges the surface water flood mapping without providing an updated surface water model or a detailed review of the model that provides the current mapping. However, in section 12.1.40, the FRA goes on to state the applicant's modelling has verified the pluvial flood depths and flow routes. It is unclear what is meant at this time as to whether this relates to the Environment Agency's Surface water modelling has been validated or whether this modelling supports the applicant's statement. The structure of the "pluvial flooding" section and the presentation of the information is unclear. In addition, in relation to Plates 12-11 and 12-12, it is not clear which fields are which. Additional notation on the photos would be appropriate rather than an unlabelled arrow on one photo. Further work and information is required.	The outputs of the 2D direct rainfall modelling undertaken as part of ES Appendix 12.2: Flood Risk Assessment [AS-053] shows a good correlation with the Environment Agency's surface water flood mapping. Both modelling outputs show an area in Fields 29 and 30 where water pools to a depth of over 0.5 m, suggesting a topographical hollow. Paragraph 12.1.39 of ES Appendix 12.2: Flood Risk Assessment [AS-053] was not intended to make a formal challenge to the Environment Agency's mapping but rather to relay the observations from the site walkover, where topography was shallow and no obvious signs of a topographical hollow were present. Regardless, the outputs of the 2D modelling will be used to design the Scheme at the detailed design phase.
NCC92	The LLFA notes that in section 12.1.41 and 12.1.43, the applicant refers to the Environment Agency's What is the Risk of Flooding from Surface Water map? Report (version 2.0 April 2019). The LLFA understands that this information has been updated since the release of the NaFRA2 Risk of Flooding from Surface Water Flood Extents in March 2025. Therefore, the LLFA is concerned that reference the latest information for the new maps based on a significantly revised method has not occurred. Further work is required.	The 2D model uses well-established principles and appropriate parameters, indicated by the extents closely matching those of the Environment Agency, demonstrating an acceptable approach to modelling pluvial flood risk.
NCC93	The LLFA also notes there are many concerns with the approach and points of clarification in relation to the hydraulic model (see comments in relating to FRA Appendix F). In Table 12-1 the information for the 2D model parameters provided is more detailed than the information provided in the hydraulic modelling report in Appendix F. This should not be the case. At this time, the LLFA would not consider the hydraulic model suitable for use until further work to resolve those concerns has been undertaken. Further work is required.	Table 12-1 of ES Appendix 12.2: Flood Risk Assessment [AS-053] provides a summary of parameters while Appendix F – Modelling Report provides more granular detail of the model parameters and the outputs, such as mass balance logs. As such, there is more detail in the Modelling Report than Table 12.1 The Applicant has requested a meeting with the LLFA to discuss the 2D model parameters.
NCC94	The LLFA is aware that while work has been undertaken on preparing and reviewing evidence for the assessment of flood risk. However, the flood risk assessment has not provided an assessment of the pre and post development surface water flood risk. Furthermore, the applicant on a couple of occasions has not evidenced their statements such as in section 12.1.48 to 12.1.49 for Reservoir	The 2D model provides a robust and reliable flow pathway for the pre-development scenario, which closely matches the Environment Agency's pluvial datasets. It is not possible to present a 'post-development' scenario, as the Scheme does not have a detailed layout or final levels. As such, ES Appendix 12.2: Flood Risk Assessment [AS-053] outlines that Work Nos. 2-4 will be served by a formal SuDS system designed to the 1% AEP + 40% climate change event, meaning that the



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	Flooding or in sections 12.1.53 to 12.1.54 for Tidal Flooding. Further work is required.	pluvial flow pathway presented in ES Appendix 12.2: Flood Risk Assessment [AS-053] is the best representation of flood risk at this time. The 2D modelling can be updated to include post-development levels once the detailed design is more established following granting of the DCO. Regarding reservoir flooding, the Scheme is located outside the extents of flooding as per the EA's check long term flood risk service. For completeness, ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated at Deadline to include the source of information, whoever the conclusions will not alter. Regarding tidal flooding evidence, as outlined in the ES Appendix 2.1: EIA Scoping Opinion Request [APP-133] and agreed with PINS and the EA, tidal flooding was scoped out of the assessment, and it is not considered necessary to update this section.
NCC95	There are a number of occasions where there is unnecessary repetition of information in the FRA. For example, section 12.1.32 is very similar to section 12.2.0. It is not clear why this information was repeated. Further clarification is required.	Section 12.2 simply frames the assessment in climate change terms. It is not considered necessary to delete this section of ES Appendix 12.2: Flood Risk Assessment [AS-053] .
NCC96	While it may be the case that "All electrical and aboveground infrastructure for the Scheme is located entirely in Flood Zone 1." as stated in section 12.2.1. No evidence is provided to support this statement. Further information is required.	Figure A12-1-1 of Annex E of the ES Appendix 12.2: Flood Risk Assessment [AS-053] shows Work Nos. 1 – 4, which contain electrically sensitive infrastructure, and the extents of Flood Zones 2 and 3. These work Nos. do not intersect with Flood Zones 2 and 3.
NCC97	In section 12.2 titled "Flood Risk Assessment" the LLFA notes the lack of structure within the sub-sections. For example, the applicant has intermixed the pre and post development assessment with embedded mitigation, sequential testing and hydraulic catchment definition in an unclear manner with limited reference to the appropriate supporting evidence base. Furthermore, the 2D surface water modelling that excluded the fluvial channels has been referred as evidence for the fluvial flood risk assessment Section 12.2.6. Section 12.2.6 goes on to state "1% AEP +25% CC and 1% AEP +40% CC events stay within the confines of the unnamed linear drainage ditch and only marginally encroach into Work No 6: Works associated with the Solar PV Site in the east of the CSA." It is not possible to state this based on using a 2D model that specifically excluded any watercourse channels and flow control structures. While in section 12.2.4 the applicant indicates that the watercourse alongside the South Acre Road is "unlikely to be captured in the NaFRA2 flood mapping:" yet the NaFRA2 flood mapping shows the watercourse downstream of the A1065 is included in the fluvial mapping while the upstream side of the A1065 is shown in the NaFRA2 surface water flood mapping (both of which are publicly available). It is unclear whether all the fluvial flood risks are addressed in this assessment. Further work is required.	The LLFA's comment regarding a lack of structure in Section 12.2 is not accepted. ES Appendix 12.2: Flood Risk Assessment [AS-053] is intentionally organised by source of flood risk (fluvial, pluvial and groundwater), with baseline conditions, Scheme interaction, embedded mitigation and residual risk addressed together within each sub-section. This risk-based structure is consistent with Environment Agency and LLFA guidance and reflects best practice for NSIPs, where mitigation is embedded through design rather than presented as a separate post-development scenario. Sequential testing, vulnerability considerations and hydraulic context are therefore discussed where they are directly relevant, avoiding repetition and providing a clearer understanding of risk. Conclusions within Section 12.2 are supported throughout by a defined evidence base, including EA flood mapping, NaFRA2 outputs, bespoke 2D pluvial modelling, LiDAR analysis, site walkovers and infiltration testing, all cross-referenced within ES Appendix 12.2: Flood Risk Assessment [AS-053] and its annexes. ES Appendix 12.2: Flood Risk Assessment [AS-053] follows a similar structure to other FRAs undertaken for other DCO projects, such as Cleve Hill, Mallard Pass Solar Farm, Great North Road Solar and Biodiversity Park. Plate 12-7 of the ES Appendix 12.2: Flood Risk Assessment [AS-053] shows that the linear ordinary watercourse to the west of the Order limits is an ephemeral ditch, which was dry upon inspection during two site walkovers in 2024 and 2025, both following rainfall events, suggesting it is supplied by runoff from the surrounding fields rather than a constant baseflow. As such, the use of 2D modelling is appropriate to determine flood depths for this ditch. It should also be noted that paragraph 12.1.35 of ES Appendix 12.2: Flood Risk Assessment [AS-053] states there is a topographical rise of 5m from the southern bank of the unnamed watercourse to the proposed access point in Field 26 to the Scheme, while paragraphs 12.2.4 12.2.6 assess the risk to the Scheme on this basis.
NCC98	The Pluvial section (sections 12.2.8 to 12.2.32) focuses on the post development flood risk assessment with the consideration of mitigation measures. Reference has been made to the 2D hydraulic modelling as a means to verify the Risk of Flooding from surface water mapping. However, as the LLFA has a large number	The 2D model uses well established principles and appropriate parameters, indicated by the extents closely matching those of the Environment Agency, demonstrating an acceptable approach to modelling pluvial flood risk.



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	of concerns, the modelling at present is not considered appropriate to provide that validation at this time. Further work is required.	
NCC99	In section 12.2.9, the applicant states that "Electrically sensitive infrastructure, such as inverters, will be located outside the 3.3%, 1% and 1% AEP + CC surface water flooding extent, as shown in Plates 12-13 to 12-15 of this FRA." However, when you look at Plate 12-19 and 12-20 it is clear that the proposed development is not avoiding the areas of surface water flood risk with the National Grid Substation platform being built over one flow route and PV Solar Panel being proposed over two other flow routes. Furthermore, the FRA indicates in 12.2.11 that Solar PV Arrays will be placed in areas of surface water flood risk. The applicant does propose some mitigation, although, the sentence structure makes it difficult to interpret when different freeboard and flood depths apply. Therefore, the LLFA notes there is an inconsistency between the FRA statements and proposed mitigation and the proposed development masterplan. Furthermore, some clarification in the text reporting on the proposed mitigation is also appropriate. Further work is required.	Paragraph 12.2.9 of ES Appendix 12.2: Flood Risk Assessment [AS-053] specifically relates to Work No. 1. As such, the statement is factually correct that infrastructure such as inverters to serve Work No. 1 will be located outside the surface water flooding pathways. As outlined in paragraph 12.2.11, should PV arrays be located within modelled pluvial pathways then the leading edge of the array will be raised 300 mm above the modelled flood depth. Work Nos. 2 to 4 are considered in paragraphs 12.2.18 to 12.2.25.
NCC101	In section 12.2.10, the applicant states that "The CSA is in agricultural (arable and pastoral) use and is mostly free draining, however it has been observed that some areas in the north of the CSA are prone to generating surface water run-off during extreme or prolonged rainfall events and these areas are associated compaction from pig and poultry farming, as shown in Plate 12-16." The LLFA notes that without infiltration testing, it is not possible for the infiltration rate to be determined. Furthermore, Plate 12-16, a photo that shows the areas of pig paddocks and there is not comparable photos provided for arable areas. Therefore, the assumption in the FRA is based on incomplete information and a lack of evidence. Further information is required.	Paragraph 12.2.10, specifically using Plate 12-16 as visual evidence, is intended to convey that minor areas of the Order limits generate surface water runoff due to livestock farming causing compaction, whereas the rest of the Order limits is free draining, as demonstrated by Plates 12.9 and 12-10, where sandy soils were observed and this is representative of the arable areas. Infiltration testing for arable area is provided in Appendix 1 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. Therefore, for the reasons set out above, the Applicant does not accept that the assumptions within the ES Appendix 12.2: Flood Risk Assessment [AS-053] are founded on incomplete information or an insufficient evidence base.
NCC102	The LLFA notes that in section 12.2.12, the applicant indicates that deer fencing is likely to cross the surface water flow paths. It would be appropriate to give an indication of which flow paths and potentially at future stages of design additional hydraulic modelling may be appropriate to understand impact of the deer fencing on the surface water flow routes and whether this poses an increase in flood risk onsite or elsewhere. Further work required.	As the Scheme has Work Nos. and does not have a detailed design, the exact location of deer fencing is not known at this stage. Hydraulic modelling is not required to understand the impact of the deer fencing. As detailed within ES Appendix 12.2: Flood Risk Assessment [AS-053], paragraph 12.2.12, PV racking mounts and deer fencing are unlikely to perceptibly alter water flow pathways during heavy or prolonged rainfall events which generate overland flows.
NCC103	The LLFA notes that in section 12.2.14, the applicant indicates that the integrated conversion units, switch rooms and standalone conversion units will not be located within areas of flood risk. This is supported by the LLFA. However, the LLFA notes there is no commitment to raising the units about the finished ground level to protect the infrastructure from surface water runoff. The LLFA Developer Guidance is clear that the finished floor levels for building and key infrastructure should be at least 150mm above the finished ground level. Therefore, these modular units will need to be raised by 150mm freeboard to ensure adequate mitigation in accordance with the LLFA's Developer Guidance. Further work is required.	Paragraph 12.2.20 of ES Appendix 12.2: Flood Risk Assessment [AS-053] identifies the commitment that BESS units will not be located flush to the existing ground level made in ES Chapter 5: The Scheme [APP/6.1.2]. ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated to reflect the increased finished floor levels of the BESS units at 300 mm at a future Deadline (in accordance with the EA's request [EA13], should the proposed SuDS network surcharge.
NCC104	In section 12.2.16, the applicant states "Cables will be located underground in waterproof ducting. Areas of cable trench excavations will not be left open for	The locations of trenches are not relevant to the fact that the cable trenching process inherently means that cables are installed and backfilled relatively quickly. Therefore, the statement that "cable trench excavations



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	considerable periods of time therefore limiting the potential interaction with surface water." At present, the location of the cable trench is not defined and therefore it is not possible to assess. In addition, while a cable trench might be anticipated to be open for a limited time during construction, the considerations leading to the assumption that it will be negligible have not been laid out. For example, how long will a trench be open, where and at what time of year. At present, vague information has been provided with no supporting evidence or assumptions giving limited confidence in the incomplete assessment. Further information is required.	<i>will not be left open for considerable periods of time</i>" is correct and it is also true that inflows from surface water to the excavations are therefore unlikely. Therefore, for the reasons set out above, the Applicant does not accept that vague information has been provided with no supporting evidence or assumptions within the ES Chapter 12 Appendix 12.2: Flood Risk Assessment [AS-053] are founded on incomplete information or an insufficient evidence base.
NCC105	While in section 12.2.18, the BESS units, the customer substation and the national grid substation are shown to have minor areas at risk of surface water flooding from flood flow routes. In section 12.2.20, the applicant states "BESS units will avoid areas for flooding greater than 0.4m and be designed to remain operational i.e. have resilience or resistance to the modelled flood depth." Furthermore, section 12.2.24 confirms the Nation Grid Substation is proposed to be within the surface water flow path. At present, the applicant appears to indicate the proposed BESS and the National Grid Substation sites will be built over the flood flow routes with no consideration or assessment of the impact the displacement of surface water associated with the flood flow route and whether this could increase flood risk. At present there is not enough information or evidence provided to determine whether there is no increase in flood risk. Further information is required.	Figure A12-1-9 and Figure A12-1-6 of Annex E in ES Appendix 12.2: Flood Risk Assessment [AS-053] shows Work Nos. with surface water flooding flow paths. The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage strategy that will serve Work Nos. 2 – 4 will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as noted within paragraph 12.4.0 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. This will ensure surface water flood risk will be managed at the BESS, National Grid Substation and Customer Substation during temporary and permanent phases.
NCC106	The LLFA notes in section 12.2.20, the applicant indicates the BESS units will be raised 100mm above the finished ground level to protect the infrastructure from surface water runoff. The LLFA Developer Guidance is clear that the finished floor levels for building and key infrastructure should be at least 150mm above the finished ground level. Therefore, these units will need to be raised by at least a further 50mm to ensure adequate mitigation in accordance with the LLFA's Developer Guidance. Further work is required.	ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated to reflect the increased finished floor levels of the BESS units at 300 mm at a future Deadline (in accordance with the EA's request [EA13], should the proposed SuDS network surcharge.
NCC107	The LLFA notes that in section 12.2.222 the applicant indicates that SuDS are proposed for works 2 to 4. Section 12.1.1 confirm that Works 2 is the BESS, Works 3 is the Customer Substation and Works 4 is the National Grid Substation. It is noted that Works 1 (PV Solar Panels), 5 (Cable Route) and 8 (Access Tracks) and 11 (Mitigation and Enhancement areas) have not been considered or assessed. The LLFA previously noted that Works 6 (operational internal access tracks and improvement, maintenance and use of existing private tracks; access arrangements) and 7 (Temporary construction and decommissioning compounds / laydown areas within the Solar PV Site and works associated with these comprising areas of hardstanding; car parking; site and welfare offices and workshops", and "area to store materials and equipment; site drainage and waste management infrastructure (including sewerage)) have not been considered in the FRA or for SuDS. These works contained in 6, 7 and 8 have significant areas of impermeable surfaces. Therefore, it is not clear to the LLFA why these works and areas affected by these works have been excluded from consideration in the flood risk assessment. NPPF is very clear that there should be no increase in flood risk throughout the lifetime of the development. The LLFA is concerned the flood risk assessment is incomplete as it has not assessed or considered all the works associated with the proposed development. Further work and information is required.	All Works within the Order limits, including Works Nos. 1, 5, 8 and 11, are explicitly included within the scope of ES Appendix 12.2: Flood Risk Assessment [AS-053] (paragraphs 12.1.1 to 12.1.2). Section 12.3, Solar PV Area Surface Water Management (Embedded Design), of the ES Appendix 12.2: Flood Risk Assessment [AS-053] outlines that RSuDS will be employed for Work No. 1. Grassland under the PV arrays will likely provide beneficial effect on surface water run-off rates compared to the baseline agricultural scenario, as the fields within the Site will no longer be: • Ploughed or furrowed • Left without vegetation cover for long periods in the winter; and • Regularly traversed by heavy farm machinery. Regarding Work No. 5, the cables and trenches are underground and therefore do not require SuDs. Work No. 7 includes Work No. 7 temporary construction and decommissioning compounds / laydown areas within the Solar PV Site. As outlined in Table 18 Water Resources of the oCEMP [APP/7.6.1]. A detailed surface water drainage strategy will be prepared prior to construction of the Scheme. Drainage from the Site will include elements of SuDS design, where appropriate, such as at temporary Construction Compounds. Work No. 8 includes works to facilitate both temporary construction access and permanent access to the Order limits. As outlined in Table 18 Water Resources of the oCEMP [APP/7.6.1] a detailed surface water drainage strategy will be prepared prior to construction of the Scheme. Channel drains will be installed at site entrances



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		to prevent surface water leaving Site to the public highway. Access will be taken from existing access points, where suitable, and would initially be asphalt followed by graded Type 2 or 3 washed/clean aggregate or just use graded Type 2 or 3 washed/clean aggregate. Where new access points are required the bellmouth will typically be asphalt and would be limited in extent. This limits the potential for increased surface water runoff rates and sedimentation effects during rainfall events. Work No. 11 is not only assessed in the ES Appendix 12.2: Flood Risk Assessment [AS-053], but functions as part of the flood mitigation strategy As outlined in the oCEMP [APP/7.6.1], all access tracks and temporary compounds will be served by SuDS such as trackside drainage. Therefore, for the reasons set out above, the Applicant does not accept that the assessment is incomplete.
NCC108	In section 12.2.29 to 12.2.31, the applicant acknowledges that an "access point off the A1065 in the northeast of the CSA is likely to flood to depths of up to 0.4m during the 1% AEP (or higher return period)." The applicant proposes to use an alternative route to access the site in times of flood but has not specified this alternative route. The FRA then assesses the flood risk as negligible even though they have stated there is a flood risk to the main site access that they are unable to manage. This is an example of an inappropriate assessment of flood risk for the proposed development. Furthermore, this assessment has only considered one aspect of access in one location. There is no consideration of the access routes throughout the site or how surface water runoff from the associated impermeable areas will be managed. Further work is required.	The Applicant has incorporated two points of access to the Solar PV Site off the A1065 which will provide access to the Solar PV Site, the Customer Substation, National Grid Substation, and BESS, and be suitable for AILs. The proposed point of access will incorporate a security gate, which will be set back from the highway to allow sufficient room for an articulated HGV to leave the highway before entering the Site. As shown on ES Figure 5.1: Concept Masterplan [AS-022], the proposed northern access point is located further south than the existing access point to Field 26. ES Appendix 12.2: Flood Risk Assessment [AS-053] assesses the worst-case scenario that the access point could be taken further north, as per Rochdale Envelope parameters, and hence identified that the area on the A1065 could flood during extreme rainfall events. Should there be flooding on the A1065 at the access point in the north of the Site, then only the southern access point will be used, as outlined in paragraph 12.2.30 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. As such, the Scheme can be accessed safely during times of flooding and the assessment conclusions within ES Appendix 12.2: Flood Risk Assessment [AS-053] are robust. Both the ES Appendix 12.2: Flood Risk Assessment [AS-053] (see paragraphs 12.3.30 to 12.3.36) and the oCEMP [APP/7.6.1] outline how surface water will be managed from access tracks.
NCC109	The LLFA notes that in section 21.2.50 works 2 to 4 are proposed to be within a surface water flood flow path for the 1% AEP +40% climate change allowance event. In previous sections the applicant has indicated that these works would be built over the flow paths. However, in section 12.2.50 the applicant states "Given the marginal encroachment of the pluvial pathway onto the work area it is expected that aboveground infrastructure can be placed outside the flood extents and therefore demonstrate a sequential approach to the design of the Scheme." A similar issue has arisen with the PV Solar Panels where elsewhere in the report the flow path is to be avoided. However, in other areas of the report, including section 12.2.51, the applicant proposes to build in areas of flood risk while raising the lower edge of the panel. This inconsistency is more notable for Works 2 to 4 as one section of the report confirm construction over the flowpath while the section relation to the sequential test confirms these works area will avoid the surface water flowpaths. There is no consideration for the construction works or the operational access routes. Further work is required.	The Work Nos. represent a worst-case maximum extent of the infrastructure proposed as part of the Scheme. Commitments made within ES Appendix 12.2: Flood Risk Assessment [AS-053] are secured through the DCO and therefore the Scheme can be designed to avoid pluvial flow pathways. It should also be noted that Work Nos. 2 – 4 will be served by SuDS designed to the 1% AEP + 40% climate change event and, as such, surface water flow pathways will be directed to this system and not flow over the surface, as per the baseline scenario.
NCC110	In section 12.2.52, the applicant states "In applying paragraph 175 of the NPPF, a proportionate approach should be taken as outlined in Paragraph 20 (ID: 7-026-20220825) the NPPG." On review of paragraph 175 of the NPPF and Paragraph 020 of the NPPG, the LLFA observes there is no reference to a proportionate	All infrastructure for the Scheme is located in Flood Zone 1. Paragraph 27 of NPPG states that <i>"in applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and</i>



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	approach. However, Paragraph 020 of NPPG does states that "The assessment should demonstrate to the decision-maker how flood risk will be managed now and over the development's lifetime, taking climate change into account, and with regard to the vulnerability of its users". While Paragraph 175 confirms the requirement of the Sequential Test unless the FRA is able to demonstrate that no built development within the site boundary is in an area of flood risk from any source now and in the future. As the site has areas that are at risk of both surface water and fluvial flood risk it is clear the applicant has misunderstood these sections of the NPPF and NPPG and that the application of the sequential test is required. At present, the limited consideration of the Sequential Test does not provide sufficient information to support the application. Further work is required.	<i>mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied."</i> ES Appendix 12.2: Flood Risk Assessment [AS-053] demonstrates that the Scheme has committed to measures such as a SUDS scheme to be designed to the 1% AEP plus 40% climate change allowance ensuring that surface water will be managed and the Scheme made safe for its lifetime. As such, and as set out in the Planning Statement [APP/5.5.1], the Sequential test is not triggered.
NCC112	In relation to section 12.2.56, the LLFA further notes the proposed development is a solar farm and BESS facility with supporting electrical infrastructure. The LLFA points out that Solar Farms are considered Essential Infrastructure. However, the Essential Infrastructure in the Flood Risk Vulnerability Classification also states "Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; including electricity generating power stations, grid and primary substations storage; and water treatment works that need to remain operational in times of flood." On review of the wording, it is important to note that wording implies that essential utility infrastructure can only be located in areas of flood risk for operational reasons, such as the operation of significant cooling systems for facilities. Therefore, a demonstration of operational need will be necessary for energy infrastructure (such as the BESS or substations) being proposed to be placed in an area of flood risk from any source. As the areas of surface water flood risk are minor in terms of the comparison of the areas and there is substantial space available for the proposed development, it is possible for the infrastructure that does not have an operational requirement to be in an area of flood risk could be altered to accommodate the existing flood risk. Further work and information is required.	Only a small sections of Work Nos. 2 to 4 are located within a pluvial flow pathway with a maximum flood depth of 0.19 for the 1%AEP +40% climate change allowance event during the pre-development scenario. Given the marginal encroachment of the pluvial pathway onto the work area, it is expected that above-ground infrastructure can be placed outside the flood extents and therefore demonstrate a sequential approach to the design of the Scheme. As the Scheme does not have a detailed design at this stage, there is a commitment in ES Appendix 12.2: Flood Risk Assessment [AS-053] to have a formal drainage system for the BESS and Customer Substation designed to the 1% AEP + 40% climate change allowance, with no flooding of the drainage system built into the design, as per National Standards. As such, the current pluvial ponding would enter the drainage system, rather than flow across or pond on the surface of Work Nos. 2 to 4. As such, the post-development scenario will change the pluvial pathway by intercepting rainfall into a formal SuDS network. The Environment Agency have agreed that this principle is acceptable in their Statement of Common Ground on the Great North Road Solar and Biodiversity Park, where the BESS area was modelled to have pluvial depths greater than for the Scheme (see EA025 of the EA's SoCG for Great North Road). Should the infrastructure in Work No.s 2 to 4 not be able to be located outside the pluvial pathway during the detailed design then, ES Appendix 12.2: Flood Risk Assessment [AS-053] commits to place BESS units outside of pluvial flood depths of 0.4 m. There is also a commitment to raise finished floor levels by 150 mm.
NCC113	In relation to section 12.2.53, the LLFA notes the incomplete commitment to the provision of SuDS for the management of surface water runoff from only some of the impermeable areas of the site. Therefore, it is likely that an increase in surface water flood risk would occur. As the applicant has previously referenced NPPF Paragraph 175 and NPPG Paragraph 020 it is clear they are aware of the requirement that the development should not increase flood risk and yet the surface water runoff from not all the potentially impermeable areas has not been accounted for. Further work is required.	ES Appendix 12.2: Flood Risk Assessment [AS-053] identifies that most of the Site comprises PV arrays, which are not deemed impermeable, as they are not located on the ground surface and have regular rainwater gaps on the PV tables. Surface water will be managed through RSuDS and Natural Flood Management. Drainage principles for other ancillary infrastructures are outlined within section 12.5 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. Paragraph 12.3.30 of ES Appendix 12.2: Flood Risk Assessment [AS-053] details that access tracks will be served by trackside drainage ditches. Surface water from Work No.s. 2 – 4, and temporary Construction Compounds will be managed by means of a drainage strategy once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within Table 7 of oCEMP [APP/7.6.1]. This will ensure surface water flood risk will be managed at the BESS, National Grid Substation and Customer Substation during temporary and permanent phases, in line with NPPF Paragraph 175 and NPPG Paragraph 020. The oCEMP [APP/7.6.1] also commits to drainage principles within Table 7 for access points and access tracks across the Site.



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NCC114	The LLFA notes that in section 12.3.0, the applicant has indicated that a relatively short construction period of 24 months is not likely to generate significant amounts of sediment. The LLFA points out that it is not the duration that causes sediment movement but groundworks and sediment transportation. It is acknowledged that section 12.3 focuses on the Solar PV areas, however, it is not clear whether the access infrastructure such as tracks, or the construction compounds and infrastructure is considered within this section. Section 12.3.0 is titled "Pollution Prevention" for the construction phase, although only sediment is discussed followed by a reference to the oCEMP but with no further discussion on whether there are any other relevant sources of pollution to be considered during the construction phase. Further work and information is required.	Whilst the Applicant accepts that groundworks are a potential source of sedimentation, a long duration of construction could be a contributing factor in sedimentation. Regardless, the oCEMP [APP/7.6.1] commits to measures such as silt traps and settlement lagoons to reduce the potential for sedimentation to occur during the construction phase. ES Appendix 12.2: Flood Risk Assessment [AS-053] cross references the oCEMP [APP/7.6.1] which states in Table 18 that a detailed surface water drainage strategy will be prepared prior to construction of the Scheme. Drainage from the Site will include elements of SuDS design, where appropriate, such as at temporary Construction Compounds. ES Appendix 12.2: Flood Risk Assessment [AS-053] is not intended to provide an overview of the pollution prevention measures for the water environment, which is assessed in ES Chapter 12: Water Resources [APP-061].
NCC115	In section 12.3.1 to 12.3.7, there is a discussion that is meant to focus on runoff rates associated with the solar PV panels. However, the discussion appears to focus on need for Rural SuDS and Natural flood Management, followed by snippets of information around grassland management and solar farms. There is also reference to an Natural England technical note 101 (published September 2011 and since archived), which focuses on Biodiversity, landscaping and agri-environmental payment schemes. There is also a brief discussion on soil and watercourse protection where it also identifies the need for "Trackways and other sealed areas should have carefully designed drainage to avoid creating a pathway for erosion." Along with "Excessive run-off may need to be diverted to grassed soak-aways so as to avoid soil erosion." Furthermore, in this section there is no demonstration of the pre and post development greenfield runoff rates from the PV Solar Panel areas or an assessment of the catchment areas within the site. Further information is required.	As outlined in Section 12.3: Solar PV Area Surface Water Management (Embedded Design) of ES Appendix 12.2: Flood Risk Assessment [AS-053], the solar areas of the Scheme will utilise a Rural SuDS (RSuDS) strategy, using land management techniques, such as increase vegetation coverage and hedge/tree planting to manage runoff generated from the development infrastructure. The summary below highlights some of the academic research supporting solar panels effect on runoff and the use of land management strategies for reducing runoff: • Cook & McCuen (2013) outlines that solar panels do not have a significant effect on runoff volumes or peak flows when vegetation is present. For example, the article states "Inclusion of the panels did not have a significant hydrologic impact". Runoff is only increased when ground beneath panels is bare, which is not the case for the sites. • Valderrama et al (2024) and Wang and Gao (2023) show similar results to Cook & McCuen (2013), the inclusion of solar panels had a non-significant difference in peak discharge rate. • Walston et al. (2021) showed on average native grassland under solar panels increased water retention by 19% and 9.5% compared to agriculture and short (turf) grass. • Milazzo et al. (2023) reviews the role of grassland for erosion and flood mitigation in Europe and provides quantification that permanent grassland mitigates better runoff than arable land. • The EA (2025) published research and analysis of run-off management, the study highlights with high confidence the increase in vegetation cover (e.g. grassland) slows the flow of run-off and increases attenuation of water. The Site is currently arable land and therefore the use of grassland as a mitigation measure to reduce runoff and soil erosion will provide a betterment to the existing scenario. It should be noted that the Environment Agency have recently agreed that the implementation of grassland under the PV arrays for the Great North Road Solar and Biodiversity Park would not lead to an increase in runoff from the Site in their response to the ExA's Written Questions in that examination.
NCC116	In section 12.3.7, the applicant states that "a suitable grassland sward will be developed in areas underneath the PV arrays before the construction phase". The LLFA is aware that in the UK it typically takes 12-18 months to establish grassland vegetation capable of managing surface water runoff. The LLFA notes that this period of grassland development is not mentioned in the construction phase activities or works in the proposed development description. Therefore, there is an inconsistency between the FRA and the proposed development description in the ES. As this is a notable issue due to it being the main approach to managing surface water runoff from the solar arrays, it is important that the establishment of	Paragraph 12.8.37 of ES Chapter 12: Water Resources [APP-061] outlines that seeding of the Order limits, particularly Work No. 1, would occur in advance of the construction phase. The oLEMP [APP/7.11.1] has been updated at Deadline 1 to confirm that pre-seeding will occur as part of the preliminary works for the Scheme to ensure grassland has suitable time to establish. The LLFA did note in a meeting in September 2025 that the use of overwinter crops / agricultural stubble could also be used as suitable vegetation establishment ahead of construction. Initial consideration in regard to relevant seed mixtures is provided within the oLEMP [APP/7.11.1]. In any event, whilst as stated this will influence the management of surface water, it is anticipated that regardless of



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	the grassland is included in the construction phase prior to the construction of the Solar Arrays. Further work and information is required.	the specific mix chosen, this will result in permanent vegetated habitat, representing betterment over the existing arable situation subject to regular cultivation and periods lacking vegetation following ploughing and cropping.
NCC117	The solar array installation (sections 12.3.8 to 12.3.13) indicates that a vehicles, such as a pile driver and vehicles used to deliver the materials to site will be needed and would likely cause some compaction during installation. As each of the frame supports is only a couple of meters apart there would be a large amount of vehicle manoeuvring that could exacerbate compaction. The LLFA notes that access tracks were previously mentions as park of Works 6,7 and 8. It is not clear from the information provided to date the extent or amount of the access tracks for construction and operational activities. Therefore, it is not possible to determine whether these access tracks could be used to manage and limit the amount of compaction. In section 12.3.13, the applicant states that "should vehicles cause compaction during the installation of the PV arrays then this will be ameliorated using typical small-scale horticultural machinery and is outlined in the OSRMP." The LLFA seek clarification on the approach which appears to be that once the solar arrays are built, the contractor will rotovate the recently established grassland to reduce the compaction and then reseed these areas to reestablish the grassland that is required to mitigate the surface water runoff from the solar arrays. Further clarification and information is required.	Regarding the length of access tracks, as the Scheme does not have a detailed design it is not possible to present a track layout or length. The use of access tracks is not the only measure to limit soil compaction during the construction phase. As outlined in paragraph 12.3.11 of ES Appendix 12.2: Flood Risk Assessment [AS-053] tracked mini pile driver machinery and site inspections by a suitably experienced soil scientist and the use of appropriate plant for soil handling and reduction of ground pressure, as outlined in the oCEMP [APP/7.6.1] will be implemented to reduce the potential for soil compaction. As outlined in the oSMP [APP/7.13.1], compaction will be monitored during construction by inspecting the soil following installation of piles but prior to fixing the PV panels. If compaction is identified, remedial action must be taken while the ground remains accessible to the machinery required to relieve compaction and before the PV panels are fixed. As outlined in paragraph 12.3.9 of the ES Appendix 12.2: Flood Risk Assessment [AS-053], measures to limit compaction and ameliorate any areas of base soil following construction are outlined in the outline SMP [APP-193] and are therefore secured through the DCO. This will include rotavating areas where there is compaction prior to seeding grassland.
NCC118	The LLFA notes in section 12.3.25 that the seed mix is yet to be determined. The LLFA suggests that an indication of the seed mix at this stage would be appropriate due to its importance in relation to the management of surface water from the solar arrays. Further information is required.	Initial consideration in regard to relevant seed mixtures is provided within the oLEMP [APP/7.11.1] . In any event, whilst as stated this will influence the management of surface water, it is anticipated that regardless of the specific mix chosen, this will result in permanent vegetated habitat, representing betterment over the existing arable situation subject to regular cultivation and periods lacking vegetation following ploughing and cropping.
NCC119	The LLFA notes the first mention of "large woodland strips" that will be largely outside of the fence to help slow surface water flow in section 12.3.29. A reference to figure 5.1 is given, however on review of Figure 5.1 there are no areas of proposed woodland strips. There are areas marked as "Areas for mitigation and enhancement" but there is no further information on this figure to confirm the approach. At present it is not clear where these areas of woodland strips are to be located and how they interact with the proposed development and the surface water management scheme as there is a lack of information. Therefore, it is not possible to determine at this time if this is an appropriate approach. Further information is required.	The inconsistency between wording in paragraph 12.3.29 of ES Chapter 12: Water Resources [APP-061] and the information shown in Figure 5.1 is noted. Accordingly, the reference in paragraph 12.3.29 of ES Chapter 12: Water Resources [APP-061] will be amended to "areas for mitigation and enhancement" to correctly correspond with the information given in ES Figure 5.1: Concept Masterplan [AS-022] at a future Deadline.
NCC120	In section 12.3.30, the applicant has given their first indication that "access tracks will be served by trackside drainage ditches." This has not previously been indicated in the descriptions of the proposed development or in previous discussions relating to the works packages in the FRA which specifical excluded the access tracks from the use of SuDS to manage the surface water runoff. This is yet another inconsistency both within the FRA which provides an evidence base for the ES and the main ES report. There is a further comment in section 12.3.30 that indicates that surface water runoff would be discharged to "rough ground".	In paragraph 12.2.22 of ES Appendix 12.2: Flood Risk Assessment [AS-053] it is stated that "SuDS will be proposed for Work Nos. 2 to 4 during the detailed design phase of the Scheme and designed to the 1% AEP +40% climate change event". ES Chapter 3: Order limits and Context [APP/6.1.2] and ES Chapter 5: The Scheme [APP/6.1.2] have been updated to include reference of a SuDS design network and cross-referenced to ES Appendix 12.2: Flood Risk Assessment [AS-053] at Deadline 1 to increase consistency.



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	However, there is no indication as to where the water would discharge to such as to ground or to a watercourse. In addition, the majority of the tracks are either within the areas of solar arrays or alongside the areas for mitigation and enhancement. Therefore, this is not "rough ground" but land with an allocated use. It is also not clear if the infiltration to ground is viable at this time without further infiltration testing. The section goes on to state that "In areas within 50m of a flow or where cross-slopes exceed 1 in 20", it is not clear what is meant by "areas within 50m of a flow" refers to and the LLFA seeks clarification on its meaning. The same sentence in the operational phase section continues to state that "outflow will be monitored daily in areas with on-going construction activity." As it is in the operational phase it is thought the applicant is committing to daily monitoring of the outflow of these structures or that alternatively, the applicant is committing to previously undefined surface water drainage in the construction phase. At this time, it is not clear and further clarification is required from the applicant over what they are committing to. Further consideration, information and clarification is required.	In paragraph 12.3.30, the phrase "adjacent rough land" was intended to describe permeable, vegetated land located immediately downslope of the track where runoff can disperse and infiltrate. These dispersal zones function by slowing flow and allowing natural filtration of suspended material before runoff continues downslope. They are not dependent on infiltration capacity. In paragraph 12.3.30, "areas within 50m of a flow" refers specifically to the areas within 50 m of the pluvial flow paths. Daily monitoring is specifically for the construction phase or where there is maintenance required during the operation phase.
NCC121	The statement in section 12.3.31 is incomplete as a section as it is not clear what it will include. Further information is required.	The statement requires formatting into bullet points in ES Chapter 12: Water Resources [APP-061] which will be undertaken at a future Deadline.
NCC122	In section 12.3.33, the applicant indicates that cross drains will be serving the tracks and would discharge to a settlement pond or retention pond if necessary to control flows and sediment transfer. Further information on the proposed arrangement of the cross drains and the discharging infrastructure are shown in Figure 12-27 which indicates the potential for substantial drainage infrastructure that has not previously been indicated by the proposed development description or the FRA. This is inconsistent with the previous information given in both the FRA and the ES. It is noted that in section 12.3.36, the applicant states that SuDS will be preferential for the access tracks. However, previously the various work packages with access tracks were excluded from consideration of including SuDS in the proposed design within this FRA. This is a further inconsistency that requires addressing. Further consideration, information and outline design is required to demonstrate adequate space in available and a viable discharge location within the proposed development is required. Further information is required.	Table 7 Water Resources of the oCEMP [APP/7.6.1] commits access tracks across all Work Nos. in the Order limits to be designed to have adequate cross fall to avoid ponding of rainwater and surface runoff. Runoff from the access tracks will be directed into swales that will be designed to intercept, filtrate and convey the runoff. Check dams will be installed within the swales in order to increase the attenuation of runoff. Further measures could include the use of settlement ponds or possibly flocculent to further facilitate the settlement of suspended solids, if required. For consistency, ES Appendix 12.2: Flood Risk Assessment [AS-053] will clarify at a future Deadline that all access tracks across all Work Nos. will be served by drainage designed to the 1% AEP + 40% climate change event.
NCC123	In section 12.4.2, the applicant states that infiltration testing has been undertaken and are shown in Appendix B. The LLFA reviewed Appendix B and notes that at present the infiltration test was undertaken for the areas associated with the National Grid Substation, the Customer Substation and the BESS. The infiltration rates for this small area of the site appear favourable and infiltration could be considered a viable option. It is unclear why the infiltration testing results were not previously discussed in the report or extended to the wider site areas. Further information and explanation is required.	Infiltration testing is discussed within paragraphs 12.4.2 and 12.4.3 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. Table 12-2 shows that infiltration testing has been successful for all but one location. Infiltration testing was intentionally limited to the specific areas where impermeable surfaces will be introduced and represent the only elements of the Scheme where infiltration-based SuDS may be required to manage runoff. Observations from the site walkovers indicates that the superficial cover is homogenous across the Order limits and as such, it is anticipated that infiltration rates will be similar to the tested areas. Infiltration testing was not extended to the wide site areas as infiltration will continue to occur as per baseline conditions. The Scheme does not increase surface water runoff in these areas, as outlined in paragraph 12.3.16 of the ES Appendix 12.2: Flood Risk Assessment [AS-053]. Therefore, additional infiltration testing is unnecessary and not required to demonstrate compliance with NPPF policy on surface water management.
NCC124	In section 12.4.13 to 12.4.14, the applicant has undertaken a quick storage estimate for an attenuation feature for the combined impermeable areas for the BESS, Customer Substation and National Grid Substation Compounds. Again, in section 12.4.20 to 12.4.21, the applicant discusses the results from the initial basin	It is noted the LLFA require clarity on which infiltration rate has been used in the attenuation calculations in paragraphs 12.4.13 to 12.4.14 and 12.4.20 to 12.4.21.



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	sizing calculations undertaken in InfoDrainage. In both cases, it is not clear which of the infiltration test results have been selected for use in the calculations at this time and further clarification is required. The LLFA Developer Guidance does provide guidance on the selection of use of infiltration testing. Further information is required.	Multiple infiltration tests were undertaken within Work Nos. 2 - 4, and the recorded infiltration rates showed minor variation across the test points. The lowest (worse-case) infiltration rate, as presented in Annex B of ES Appendix 12.2: Flood Risk Assessment [AS-053], was selected for use within the preliminary sizing of the infiltration basin. This is consistent with the principle set out in the LLFA Developer Guidance that designs must take account of the lowest observed infiltration performance to ensure conservative and reliable sizing of SuDS features.
NCC125	In section 12.4.17, the LLFA notes the attenuation basin shown "in Annex C" is positioned to the north of the National Grid Substation area in the area of the surface water flow route. It is not clear to the LLFA whether consideration for the existing surface water flowpath has been included in the assumptions and whether this could result in altering the flood extents associated with the flood flow path that would potentially increase flood risk on site. The 2D surface water hydraulic model has not included any watercourses or control structures, therefore there is currently no consideration of this aspect in the current hydraulic modelling. Further work is required.	It should be noted that the 2D pluvial modelling represents flow pathways and flood depths using baseline topography. Groundworks / enabling works for Work Nos. 2 to 4 are likely to level the area to remove topographical hollows, meaning the baseline flooding scenario is unlikely to be representative of the post-development scenario. As the Scheme does not have a detailed design at this stage, there is a commitment in ES Appendix 12.2: Flood Risk Assessment [AS-053] to have a formal drainage system for the BESS and Customer Substation designed to the 1% AEP + 40% climate change allowance, with no flooding of the drainage system built into the design, as per National Standards. As such, the current pluvial ponding would enter the drainage system, rather than flow across or pond on the surface of Work Nos. 2 to 4. The Environment Agency have agreed that this principle is acceptable in their response to the ExA (see point EA027) for the Great North Road Solar and Biodiversity Park, where the BESS area was modelled to have pluvial depths greater than that of the Scheme.
NCC126	In section 12.4.22, the applicant has considered the exceedance flows from the site. However, as the applicant has also previously stated in section 12.4.15 that no earthworks or finished ground level information is available for the substations or the BESS at this time, this assessment is incomplete due to limited design information. Further work is required.	The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage strategy will serve Work Nos. 2 – 4 and will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. This will ensure surface water flood risk will be managed at the BESS, National Grid Substation and Customer Substation during temporary and permanent phases. The exceedance flow assessment present in paragraph 12.4.22 is therefore preliminary and based on existing ground levels. This preliminary assessment will be updated once final platform levels are defined as part of the detailed design stage. ES Appendix 12.2: Flood Risk Assessment [AS-053] commits to the placement of BESS units outside of surface water flow pathways and the raising of finished floor levels by 150 mm are key principles to ensure that the drainage strategy will remain compliant with NPPF requirements and demonstrate that flood risk will not increase on or off site.
NCC127	The LLFA acknowledges the applicant's attempt to apply the simple index approach to the proposed surface water drainage strategy. However, as there is a lack of information about the various networks in the proposed surface water drainage design, it is not possible to appropriately undertake this assessment at this time. In addition, the information provided in this section shows the incomplete undertaking of this assessment as it is not considering each of the different types of drainage areas in terms of hazard and mitigation. Further development of the outline drainage design that is consistent with the proposed development is required to enable the appropriate application of this assessment. Further work and information is required.	ES Appendix 12.2: Flood Risk Assessment [AS-053] applies the Simple Index Approach (SIA) correctly and proportionately for a DCO submission. Paragraph 12.1.3 explains that, in the absence of a fixed detailed layout, a principles-based drainage strategy is appropriate, with detailed design secured post-consent via draft DCO [APP/3.1.1] Requirement 11. Drainage networks are defined at a functional level sufficient for SIA application, including catchment areas, impermeable assumptions, conveyance, attenuation and infiltration measures (paragraphs 12.4.10 to 12.4.27), supported by site-specific infiltration testing (Annex B) and InfoDrainage modelling (Annex D). The SIA explicitly considers land use, pollution hazard level and mitigation measures, with the Scheme classified as low pollution hazard and mitigation demonstrated to exceed required indices for suspended solids, metals and hydrocarbons (paragraphs 12.4.24 to 12.4.27). The SIA is appropriately scoped to Works No.s 2 to 4, which generate impermeable runoff; other areas are managed via embedded design, RSuDS and NFM measures.



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		Further pre-consent detail is not required to validate the SIA. Refinement of network layouts is appropriately secured post-consent and does not undermine the completeness or robustness of the assessment. The SIA approach provides an outline assessment for the Work Nos. which require a formal SuDS network and provides a guide that the Scheme can meet the requirements of removing pollutants using SuDS. This will be confirmed following the detailed design stage of the Scheme and is secured through Requirement 11 of the DCO.
NCC128	The LLFA note that the applicant has committed to a 3.5m wide access or buffer strip for vehicles to access for maintenance activities. While the LLFA supports this approach, at present it is not possible to determine whether it is viable to apply the approach due to a lack of available design information. Further information is required.	The commitment to a 3.5 m strip is secured in the Design Principles, Parameters and Commitments [APP/5.8.1] , which has been updated at Deadline 1, securing it as a commitment in the DCO, and will be incorporated into the design of the Scheme following the issue of the DCO (if consented).
NCC129	In relation to section 12.4.34 to 12.4.44, the LLFA notes the focus of the fire suppression considerations is on the BESS facilities. However, there does not appear to be consideration of the two substantial substations beside the BESS site. Further information is required on the management of the interaction of surface water and fire water from the substations due to the presence of features such as transformers. Further information is required.	Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053] covers drainage for both the BESS and substations (National Grid and Customer Substations). As such, the commitment in the ES Appendix 12.2: Flood Risk Assessment [AS-053] ensures that the detailed design of the Scheme will take cognisance of the requirement to contain firewater from a fire event at the substations.
NCC130	In section 12.5, the applicant proposes to infiltrate the surface water runoff from the inverter and converter units. However, no infiltration testing or ground investigation has been provided to demonstrate this is viable drainage approach in the relevant areas. Further information is required.	The Applicant confirms that infiltration-led drainage for inverter and converter units is based on site-specific infiltration testing reported in ES Appendix 12.2: Flood Risk Assessment [AS-053], which demonstrates that the prevailing ground conditions across the Order limits are generally suitable for infiltration and provides a reliable indicator of viability in principle. Given the consistency of underlying geology, the limited runoff volumes associated with the converter units, and the small-scale, localised nature of the proposed aggregate infiltration measures, no additional location-specific testing is required at the DCO stage. In line with LLFA guidance and accepted NSIP practice, detailed drainage layouts and confirmation of final infiltration locations will be addressed at detailed design and secured through the DCO Requirements, with sufficient flexibility retained to respond to any localised ground variation without increasing flood risk elsewhere. On this basis, the Applicant considers that infiltration feasibility has been adequately demonstrated and that no further pre-consent information is necessary. Infiltration testing was not extended to the wide site areas, as infiltration will continue to occur as per baseline conditions. The Scheme does not increase surface water runoff in these areas, as outlined in paragraph 12.3.16 of the ES Appendix 12.2: Flood Risk Assessment [AS-053]. As outlined in Section 12.5 Ancillary infrastructure of ES Appendix 12.2: Flood Risk Assessment [AS-053] gravel filter drains will be used around the perimeter of the inverter and conversion units to capture any surface water runoff generated from the small introduction of impermeable areas. The filter drains will infiltrate into the ground to mimic the existing baseline scenario. Detailed drainage design is secured through Requirement 11 of the DCO and needs to be approved by the relevant planning authority in consultation with the Environment Agency and Anglian Water Services Limited or its successor in function as the relevant water undertaker prior to the construction phase.
NCC131	In general, the LLFA has found the limited structure of this FRA report made it difficult to interpret and review. There are also a large number of inconsistencies within the proposals, incomplete sentences and typographical errors that make interpreting this report and the supporting appendices difficult. Further work to improve the structure and the text so that a clearer understanding of the work	ES Appendix 12.2: Flood Risk Assessment [AS-053] follows a structure established across several DCOs, such as Cleve Hill, Mallard Pass, Great North Road. The Applicant has responded to the LLFA's comments above and below, and has identified where updates to the ES Appendix 12.2: Flood Risk Assessment [AS-053] are necessary.



Reference number	Representation	Applicant response
	undertaken is available to the readers of the assessment and supporting information necessary. Further work required.	
NCC132	In section 12.2.1, the applicant states that "An additional walkover was undertaken in September 2025 to verify the results of the 2D rainfall modelling." However, it is not possible for the results of a hydraulic model to be verified with a walkover. The Hydraulic Modelling Best Practise Guidance is clear that "To verify your model, you'll run another observed flood event through your calibrated model with no changes to the coefficients." as stated at https://www.gov.uk/government/publications/river-modelling-technicalstandards-and-assessment/hydraulic-modelling-best-practice-model-approach#flood-riskassessments The LLFA are aware that as there are no gauging stations and limited information available in the area, making it unlikely the hydraulic model could be calibrated to appropriate events. Furthermore, verification can normally only occur once calibration has been undertaken. Typically to calibrate a model, at least one hydraulic event is required to compare the model against. To verify the model, a further event would then be required. Therefore, in accordance with the hydraulic modelling best practice guidance, it is clear that a second site walkover is not a suitable method for verifying the results of hydraulic modelling. Later in section 12.6.1 to 12.6.2, the report indicates there is no river Further work is required.	In reference to the second site walkover, this was undertaken to verify the likely pathways and ponding undertaken by the 2D pluvial model. As noted by the LLFA, there are no suitable gauging sites within the catchment of the development and therefore the 2D model cannot be calibrated against an observed event. In the absence of such data, the Environment Agency's 2D pluvial modelling was used as a benchmark for the extents and depths of the 2D pluvial model as part of the ES Appendix 12.2: Flood Risk Assessment [AS-053] . As shown on Plate 12-13 of ES Appendix 12.2: Flood Risk Assessment [AS-053] , the 2D extents model for the development closely match the outlines of the Environment Agency's 2D model and as such the 2D model produced as part of ES Appendix 12.2: Flood Risk Assessment [AS-053] is likely to be producing credible results.
NCC133	In section 12.2.2, again the applicant states "elevations from 37m above ordnance datum (AOD) in the south to 85m AOD in the northeast, as shown in Plate B12-1-1." However, when looking at the information displayed in Plate B12-1-1, it is clear the lowest level is in the north and the highest elevation is in the south. The LLFA suggests the FRA is corrected to reflect the data shown. Further work and correction is required.	Paragraph 12.2.2 of Annex F: Pluvial Modelling Report of ES Appendix 12.2: Flood Risk Assessment [AS-053] will be corrected at a future Deadline to state "elevations from 85m above ordnance datum (AOD) in the south to 37m AOD in the northeast, as shown in Plate B12-1-2."
NCC134	The LLFA notes that in section 12.2.5 and Plate B12-1-2, the applicant has an inconsistency in relation to the definition of the scope of the hydraulic model. At present section 12.1.1 states "the results of the hydraulic modelling carried out to verify pluvial flood depths and flow routes within the River Nar catchment", this is continued as a modelling area scope in section 12.2.5. However, in Plate B12-1-2 the catchment area shown is only that of the unnamed watercourse beside the South Area Road that is a minor tributary to the River Nar. Therefore, it is not clear whether this model is for the River Nar as stated in the introduction of this report or whether it is a much smaller model for the unnamed tributary to the River Nar. At present, the assessment decision discussion and supporting narrative is unclear. Further information and clarification is required.	There is no inconsistency in ES Appendix 12.2: Flood Risk Assessment [AS-053] . References to the 'River Nar catchment' describe the geographical context of the Site, not the extent of the pluvial model. Fluvial flood risk from the River Nar is assessed separately using Environment Agency datasets and modelling outputs. Pluvial flood risk is assessed using a localised direct rainfall 2D model, with the active model domain intentionally limited to the topographic catchment draining towards the unnamed watercourse east of South Acre Road, as shown on Plate B12-1-2. This approach is consistent with best practice for pluvial modelling and is clearly explained in paragraphs 12.1.39 to 12.1.46. The modelling scope, figures and assessment conclusions are therefore internally consistent and require no further clarification. As there is limited risk of pluvial flooding within and beyond the Order limits, the aim of the study was to focus on areas of specific risk, and as such the rainfall zone concentrates on this area. Therefore, on Plate B12-1-2 the catchment area shown is the concentrated area for pluvial flood risk.
NCC135	The LLFA notes in the FRA the definition of the catchments used for the hydraulic model has not been compared with the catchments identified in the exceedance pathways shown in Figure A12-1-13 that supports the drainage designs. It is unclear whether there is any difference between these areas. Further work and consideration is required.	ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated at a future Deadline to provide clarification on the use of rainfall areas for the 2D model, which was intended to focus on Work Nos. 2 to 4.



Reference number	Representation	Applicant response
NCC136	The LLFA has a number of concerns with the hydraulic modelling approach that has been applied as discussed in sections 12.3.1 to 12.3.4. The LLFA acknowledged that a 2D Direct Rainfall model can be used to assess pluvial surface water runoff. Although, this is normally only the case when there is no defined channel. However, on this site there is a defined channel as a watercourse is shown both on the OS mapping and the Environment Agency fluvial flood mapping. Furthermore, the Environment Agency surface water mapped extents also align with the OS mapped watercourses. Therefore, it would be appropriate for the hydraulic modelling to be a 1D / 2D hydraulic model. This could even incorporate or cross reference the existing Environment Agency fluvial hydraulic model so that some calibration with the Environment Agency model could be considered. At present the LLFA is not confident with the modelling approach that has been applied. Further work is required.	The only defined channel that is not a blind ditch within the Order limits is an Ordinary Watercourse that runs south to north on the eastern boundary of Field 36. As discussed with the LLFA during a meeting in September 2025, Field 36 will comprise grassland for Skylark Mitigation (Work No. 11) which is deemed compatible to be located within Flood Zones 2 and 3. Given the absence of above ground infrastructure within the vicinity of the defined channel, 1D-2D modelling is not deemed necessary as there would be no loss of floodplain or impediment of flows should this watercourse flood during the 1 in 100 and 1 in 1000 year event. The nearest infrastructure to this defined channel is over 9 m higher in elevation than the unnamed Ordinary Watercourse, further demonstrating that 1D-2D modelling is not required to assess the effects of fluvial flooding on the Scheme. As outline in paragraphs 12.1.37 and 12.2.5 of ES Appendix 12.2: Flood Risk Assessment [AS-053], there is a topographic rise of 5 m from the unnamed linear ditch on the eastern boundary of the Order limits, and as such water cannot reach the site and therefore 1D-2D modelling of this is not deemed necessary.
NCC137	The LLFA is concerned the site specific topographic survey undertaken by the applicant of the proposed development site by drone has had to be discounted as it is not of suitable quality as it "leads to an underrepresentation of pluvial flooding within the Site, as shown in Plate B12-1-3." Plate B12-1-3 appears to show that the drone data has taken higher ground level readings than the Lidar data. It is worth noting that Lidar data is also remote sensing of ground levels. Therefore, at present the FRA and the hydraulic modelling has not included any site specific measurements to compare against the remotely sensed data. It is not appropriate to not have any site specific data in this case. Furthermore, in section 12.3.8, the FRA states "a good correlation was found between LiDAR and topographical data values." However, in Plate B12-1-3 there is a clear difference between the levels shown in the LiDAR data (the area outside of the dashed box area) and the drone survey data (the levels shown inside the dashed box area). This appears to contradict the statement made in the FRA. The LLFA lacks confidence in the statement based on the information presented in the report. Further information and work is required.	The site-specific drone levels were used for correlation checks to validate the LiDAR dataset. Annex F, paragraph 12.3.6 of ES Appendix 12.2: Flood Risk Assessment [AS-053] states that the drone data does not provide a sufficiently accurate topographical base for modelling fine details, and pluvial modelling outputs shown in Figure B12-1-3 have a poor resolution. Therefore, LiDAR was used as the modelling surface as it produced a more precautionary flood representation. Topographical drone data was discounted due to poor resolution, not due to lack of site-specific data. The statement in paragraph 12.3.8 that a "good correlation was found" refers specifically to spot-checks undertaken in open field areas where LiDAR and drone data values did correlate well. It is acknowledged that the LLFA's concern that Plate B12-1-3 of the Pluvial Modelling Report shows visible differences between LiDAR and drone data within the dashed comparison area. Upon reflection of the interpolated topo drone data, there is an anomaly in the north-west corner, where the drone-derived levels appear artificially elevated relative to the LiDAR surface. This discrepancy is attributable to an error within that localised portion of the drone dataset, rather than a systematic issue with the entire survey which has led to the discrepancy between the datasets in Figure B12-1-3. The anomalous surface tile will be corrected in ES Appendix 12.2: Flood Risk Assessment [AS-053] at a future Deadline and the visual comparison will be consistent with the spot-check results. The change required in Plate B12-1-3 will not contradict the statement made in the Pluvial Modelling report and will not change any output of the pluvial modelling.
NCC138	The LLFA notes that the section titled "Mesh Modifications" does not appear to discuss the mesh but rather the roughness values for the different types of terrain. Further information about the Model Mesh is required.	ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated at a future Deadline to provide clarification that the modification to the 'mesh' were simply surface roughness changes to account for roads and woodland.
NCC139	The LLFA notes that in section 12.3.12, the report states that "there are no structures, such as river culverts, embankments and flow controls that have been incorporated into the model." The LLFA is concerned at the lack of relevant geometry that has not been included in the hydraulic model, possibly due to insufficient site specific survey. However, as there is a culvert below the road (visible with the handrailing on the roadside) that connects the watercourse on the South Acre Road elsewhere. Furthermore, later in section 12.4.2, the model has included the River Nar watercourse channel area in and around Castle Acre. Therefore, again the LLFA is concerned the hydraulic modelling has not taken appropriate account of relevant features. Further work and information is required.	The statement in paragraph 12.3.12 relates specifically to the direct rainfall (pluvial) 2D model, which appropriately excludes culverts, embankments and flow controls in accordance with EA guidance for surface water modelling. The purpose of this model is to identify overland flow paths and ponding based on topography, for which inclusion of underslung culverts (e.g. beneath South Acre Road) is neither necessary nor material. References to the River Nar elsewhere in ES Appendix 12.2: Flood Risk Assessment [AS-053] relate to separate fluvial flood risk assessment using EA datasets, not to the pluvial model geometry. There is no inconsistency within ES Appendix 12.2: Flood Risk Assessment [AS-053] and no omission of relevant features. Further modelling or survey work is not required. For 2D direct rainfall models, the aim was to capture general flow patterns and depths in proximity to the Scheme, not detailed pipe hydraulics.



Reference number	Representation	Applicant response
		Surface flow pathways dominate flood extents, making culvert representation less critical and the absence of these structures within the 2D model means that a realistic worst-case scenario (i.e. undersized culverts) is presented, producing a more conservative pluvial model. As outlined within paragraph 12.4.2, the active area extent of the model was extended to a small area of the River Nar channel to prevent the model from glasswalling near the Scheme and causing unrealistic results, i.e. excessive surface water backing up in the model or high mass balance error.
NCC140	The LLFA notes that in section 12.4.1, the Active Rainfall Zone area is not consistent in size or shape with the catchment area shown in Plate B12-1-2. There is a lack of explanation and justification for this inconsistency. Further information is required.	The rainfall zone used within the 2D model was selected to concentrate on that specific area of the Site which was identified by the Environment Agency's flood mapping to be at risk of pluvial flooding and therefore the model focus was on this area. As there is limited risk of pluvial flooding within and beyond the Order limits, the aim of the study was to focus on areas of specific risk, and as such the rainfall zone concentrates on this area. As shown on Plate 12-19 of the ES Appendix 12.2: Flood Risk Assessment [AS-053], the 2D extents model for the development closely match the outlines of the Environment Agency's 2D model and as such the 2D model produced as part of the ES Appendix 12.2: Flood Risk Assessment [AS-053] is likely to be producing incredible results.
NCC141	The LLFA notes that in section 12.4.1, the Active Area of the model extends significantly beyond the extent of the catchment depicted as being modelling in the scope. The LLFA notes the area incorporates the fluvial model area of the tributary to the River Nar and the River Nar to the south and west of Castle Acre. Again, there is a lack of explanation and justification for this inconsistency. Further information is required.	The active area of the model extends beyond the extent of the rainfall catchment to prevent glasswalling from occurring within the model which could lead to inaccurate pluvial flood depths being presented. As the River Nar is over 1.5 km from the nearest infrastructure in Work Nos. 2 – 4, the influence of levels within the River Nar during a prolonged or heavy rainfall event is unlikely to have any influence on flood depths due to the large distance.
NCC142	The storm duration has been stated as "3 hours", with a further statement that "the critical storm duration was the summer 3-hour storm duration as it resulted in the greatest surface water depths". However, there has been no explanation of the process used to determination the critical storm duration and the range of storms that were tested and whether it was appropriate. The LLFA lacks confidence due to a lack of information supporting the selection of this critical storm duration. Further information is required.	In paragraph 12.4.9 of the modelling report it is stated that a 3-hour storm duration was chosen as it resulted in the greatest surface water depths and is therefore used for design runs within the model. This method has been selected based on Environment Agency guidance on Hydraulic modelling: best practice (model approach) and Flood Estimation Guidelines (FEG) on Estimation of flood flows following Environment Agency best practice (September 2025).
NCC143	In section 12.6.3, the applicant has indicated in the assumptions that "OS MasterMap is an accurate representation of ground cover". This is inconsistent with the earlier statement in section 12.2.1 where the applicant clearly states that two site walk overs were undertaken in relation to informing this model. Therefore, it is not clear to the LLFA why the applicant would need to assume the ground cover when two walkovers were undertaken. Further information and justification are required.	The OS Mastermap was used as a baseline GIS dataset for assigning ground cover types within the 2D model. The two Site walkovers referenced in paragraph 12.2.1 of ES Appendix 12.2: Flood Risk Assessment [AS-053] were not intended to replace the OS Mastermap, but instead to verify this baseline dataset.
NCC144	The LLFA notes that in section 12.6.2, the applicant indicates that the extents are similar to the Environment Agency RoFSW map and then goes on to states "The comparison can be seen from Plate B12-1-7." On review of Plate B12-1-7, the plate is titled Environment Agency RoSWF 2025 Flood Extents, although there is no comparison of two data sets or a data set showing change in extents. The legend references "ref: 083-FRA-005A" but it is not clear what this is a reference to. Further work is required.	The statement in paragraph 12.6.2 intended to convey that the modelled pluvial flood extents were similar to the Environment Agency's Risk of Flooding Surface Water extents, demonstrating that the model outputs were consistent with national-scale pluvial mapping. Plate B12-1-7 does not show a direct comparison, but instead shows the Environment Agency's Risk of Flooding Surface Water 2025 extents that can be used to visually compare to the model outputs.
NCC145	The LLFA notes that in the Model results section ins 12.5.1, no summary discussion on the model results is provided but rather a reference to information in Appendix 2. On review of Appendix 2 titled "Pluvial Flood Depths", the LLFA notes	Figures within Appendix 2 of Annex F of ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated at a future Deadline to only show the modelled pluvial flood depths and to remove all duplications.



Reference number	Representation	Applicant response
	that the first four figures relate to Flood Extents. The LLFA notes that of the 11 flood depth plans that have been included Figure A12-2-6 was repeated four times. It is not clear what the difference is in these four identically labelled and depicted figures for Figure A12-2-6. However, it continues to be clear that the north west corner of the National Grid Substation is proposed to be constructed over a significant surface water flowpath. The results are not shown at a suitable scale to review the results in relation to the proposed development plans. Further work and information is required.	Paragraph 12.2.19 of ES Appendix 12.2: Flood Risk Assessment [AS-053] shows pluvial flood depths and the interactions with Work Nos. at a suitable scale to enable the reader an appreciation of flood depths within specific areas of the Order limits and the wider area. The Scheme only has Work Nos. and does not have a detailed design at this stage. ES Appendix 12.2: Flood Risk Assessment [AS-053] commits to the placement of BESS units outside of surface water flow pathways as shown in paragraph 12.2.24. It is also stated in the same section that the National Grid Substation is only marginally located within the modelled outputs and should be able to avoid the pluvial pathway for above ground infrastructure.
NCC146	In general, there is some confusion about the labelling, numbering and information shown on the figures in Appendix 2. For example, the four Figure A12-2-6 that all show the same information and there are also four versions of Figure A12-2-2 that are thought to show the same information on all of them. There are three versions of Figure A12-2-1 that are thought to show the same information on all of them. There are also two versions of Figure A12-2-4; one with 1% AEP +40% depths (which is the same as A12-2-6) and one with 1% AEP +25% depths. There is no Figure A12-2-5. Further work and information is required.	Figures within Appendix 2 of Annex F of ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated at a future Deadline to only show the modelled pluvial flood depths and to remove all duplications.
NCC147	The LLFA notes that on review of the information in appendix 2 there is no comparison of the Environment Agency flood model results with the development prepared 2D model. It is also clear that there is no summary of depth at key locations on the site, which would be appropriate especially in areas of interest around the proposed development and any existing structure elsewhere that could be affected by the development. Further work is required.	Figure A12-2-1 of Appendix 2 of Annex F of ES Appendix 12.2: Flood Risk Assessment [AS-053] shows the Environment Agency's Risk of Flooding Surface Water outputs that can be compared to the Applicant's 2D pluvial model. Summaries of pluvial depths at key locations, including Work Nos. 1 – 4, are given within the pluvial section of Section 12.2 of ES Appendix 12.2: Flood Risk Assessment [AS-053] .
NCC148	The LLFA also notes that as there are so many concerns and points of clarification required in association with the hydraulic model, the LLFA would not consider the latest model suitable for use until further work to resolve those concerns has been undertaken. Further work is required.	The Applicant have requested a meeting with the LLFA to discuss their concerns, given the approach to 2D modelling is analogous with that of the Great North Road Solar and Biodiversity Park and the area of the Scheme identified as being at risk of pluvial flooding is minimal.
NCC149	The LLFA notes in section 2.1.1, the applicant proposes a separate role of Flood Warden during the construction phase of the team. While this approach is supported, the LLFA recommends that Site Manager, Construction Project Management and Environmental Manager all retain some oversight and responsibility for the management of the flood risk on site. Clarification is required.	Table 7 of the oCEMP [APP/7.6.1] outlines that the contractor is responsible for the management of all surface water runoff, including the design and management of a drainage scheme compliant with SuDS principle. Section 6 indicates that the Construction Project Manager and Environmental Manager have responsibility for ensuring compliance with the detailed Construction Environmental Management Plan. As such, it will not be the sole responsibility of the Flood Warden to ensure that surface water is being properly managed onsite.
NCC150	The LLFA notes in section 2.2 there is no consideration of the 12 to 18 months period that would be required for the establishment of the grassland within the Solar Array areas in accordance with the requirement laid out in the FRA for the vegetations to be full established prior to the construction of the Solar Arrays. Further work and consideration is required.	The Applicant has responded to this comment above in NCC74.
NCC151	In Table 7 in section 3.8, the LLFA notes that many of the previous concerns raised in relation to the FRA and the ES are relevant to the surface water management sections in Table 7. The LLFA notes that there are a couple of additional design indications that relate to the Bellmouth Drainage, Check Dams, settlement lagoons, excavated soil stores. However, due to a lack of information relating to the design proposals it is not possible to determine whether these would be viable or appropriate at this time. Further information is required.	The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053] . This will ensure surface water flood risk will be managed at the BESS, National Grid Substation and Customer Substation during temporary and permanent phases. The detailed design of the SuDS network for the Scheme will be provided to the LLFA, following issue of the DCO (if consented).



Reference number	Representation	Applicant response
NCC152	There are substantial section within Table 7 on the structures that could be used to facilitate watercourse crossings and culverts. However, there is still no indication of where this is relevant to the site. Furthermore, there is a contradictory messages in both the ES and the FRA and even within the FRA itself about whether there are watercourses that would need to be crossed within the Order limits. Further information and clarification is required.	ES Figure 12.2: Indicative Watercourse Crossing [APP-116] shows the indicative locations of watercourse crossings based on the design information presented in ES Figure 5.1: Concept Masterplan [AS-022]. The watercourse crossings are subject to the detailed design of the Scheme and will be designed in accordance with the parameters outlined in the oCEMP [APP/7.6.1]. As paragraph 12.6.67 of ES Chapter 12: Water Resources [APP-061] states that there are no natural watercourses within the Scheme which require crossing and instead are manmade ditches shown in Plates 12-8 and 12-9. These are not watercourses in the typical sense and instead are ditches that are not connected to the hydrological system. Therefore, these crossings do not require Ordinary watercourse consent.



2.2 RR-011, Breckland Council

Reference number	Representation	Applicant response
BC1	The Council holds significant unresolved concerns regarding the impacts of this Scheme on the district, as outlined below. These concerns derive from the Council's statutory consultation response (attached for reference) and the applicant's Consultation Report responses (Section 42) which have been fully reviewed.	The Applicant notes this comment and addresses the Council's points in turn below.
BC2	These Relevant Representations identify principal issues requiring detailed examination and areas of incomplete information. The issues highlighted will be expanded upon by the Council through its Local Impact Report (LIR), Written Representations and Statement of Common Ground.	The Applicant notes this comment and welcomes continued engagement with the Council.
BC3	The Council acknowledges positive amendments made in response to the previous statutory consultation, including the relocation of the BESS and substations from fields to the north of Bartholomew's Hills Plantation to locations to the south of the plantation (Fields 24 and 27 for the BESS and Field 27 for the substations). Removal of solar arrays from Fields 32, 34, 35 and the northern part of Field 33 are also acknowledged and supported in line with Council requests, as is the removal of the majority of woodland blocks from the Order limits. Accordingly, it is considered that the previously raised concerns regarding above ground cultural and heritage impacts have been satisfactorily addressed. Additionally, the Council is supportive of the detailed representations of the Borough Council of King's Lynn and West Norfolk regarding heritage assets located within its boundary.	The Applicant notes and welcomes this comment.
BC4	Notwithstanding the above, the Council maintains the following major concerns: - Cumulative landscape and visual effects, particularly with High Grove Solar Farm. - Proliferation of solar development across Norfolk, with the East of England disproportionately affected. - Lack of district level analysis of agricultural impacts, including food production and wider agricultural economy effects. - Insufficient demonstration of public benefits at district level, including limited local energy benefit and unclear Community Benefit Fund structure. - Assessment of Landscape impacts and technical matters regarding the preparation of the Landscape Visual Impact Assessment - Uncertainty arising from the Scheme's grid connection position, currently at Gate 1, contrasting with other regional NSIPs (e.g. High Grove at Gate 2).	Each of the concerns raised by the Council have been addressed in turn in the response below. <u>Cumulative landscape and visual effects, particularly with High Grove Solar Farm:</u> ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme with Section 6.11 presenting Cumulative Effects Assessment which includes High Grove Solar Farm. These are considered in more detail in the specific response below. As set out in the Planning Statement [APP/5.5.1], on balance, and in accordance with paragraph 5.10.35 of NPS EN-1 (2023), the residual adverse landscape and visual effects, including cumulative effects, are not considered to be of such magnitude or significance as to outweigh the demonstrable benefits of the Scheme. This conclusion is reached in the context of the careful and sensitive design approach adopted for the Scheme. <u>Solar Development Across Norfolk:</u> The Applicant is aware of other projects in the region. Each of the ES Topic Chapters and ES Chapter 18: Summary of Effects [APP-067] consider the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Statement of Need [APP-042] and Planning Statement [APP/5.5.1], submitted in support of the DCO Application, set out the justification for the Scheme and its proposed location and scale within the context of the clear and urgent national need for low-carbon energy generation. <u>Agricultural Impacts:</u> The potential effects of the Scheme on agricultural land and soil resources are assessed in ES Chapter 11: Soils and Agriculture [AS-018]. This concludes that, with embedded and additional mitigation measures in



Reference number	Representation	Applicant response
		place, the Scheme would not result in any significant adverse effects on soil or agricultural land resources throughout its lifecycle. A worst-case cumulative assessment has been applied; there is the potential for permanent land loss of BMV quality from all the developments to exceed 20ha, which would result in a cumulative impact of a moderate adverse effect, which would be significant in EIA terms. As stated above, this effect should, however, be considered in context. The estimated areas of agricultural land from the provisional ALC maps in Norfolk (479,000ha) and Breckland (107,000ha) are set out in Chapter 11 in Table 11-8 of section 11.8. As set out in section 11.11, taking the average utilised agricultural area figures for the UK and applying that to Norfolk, then 335,000ha are farmed. The cumulative area involved with The Drovers, East Pye and High Grove amounts to about 1% of farmed land in the county. The effects on food production regionally and nationally are negligible, as set out in section 11.11. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy NPSs or the NPPF. <u>Demonstration of Public Benefits:</u> 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. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider scale benefits of the Scheme. The electricity generated by the Scheme would be exported to the national grid, at which point it would cease to be under the Applicant's control and would instead be dispatched and distributed by the operator in accordance with supply and demand across the network. The Scheme will make a contribution to meeting the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (2023) (section 4.2) and NPS EN-3 (2023). This therefore will benefit the national population rather than just the local population. Efforts to provide specific benefits in locally impacted communities are set out in the oESCSS [APP-195] (for employment and economy), in the oLEMP [APP/7.11.1] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes (as secured in the oPRoWPPMP [APP-192]), or through the Community Benefit Fund (separate to the DCO process). The Applicant is committed to ensuring that communities benefit from the Scheme. As set out in the Planning Statement [APP/5.5.1], the Applicant has committed to providing a Community Benefit Fund. 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 Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). The Statement of Need [APP-042] provides evidence that there is an urgent need for an unprecedented capacity of new low carbon electricity generation schemes to come forwards to deliver legally binding carbon emission reduction targets, maintain security of supply and deliver on the affordability of energy. “Solar is a key part of the government’s strategy for low-cost decarbonisation of the energy sector”, per paragraph 2.10.9 of NPS EN-3 (2023) and “is at the heart of [the Government’s] Clean Power 2030 Mission” per paragraph 2.10.2 of NPS EN-3 (2025). Such an increase in generation capacity is needed to decarbonise current electricity demand and also to meet the expected significant increase in electricity demand over the coming years “as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity”, per paragraph 3.3.3



Reference number	Representation	Applicant response
		of NPS EN-1 (2023). The 2025 NPS maintains the same wording at paragraph 3.3.3, which further supports our position as the policy has remained consistent in this regard. The Statement of Need [APP-042] also explains that the overhead line into which the Scheme will connect, is an existing part of the National Electricity Transmission System with sufficient capacity to transmit the energy the Scheme will generate, so providing access to low carbon, low marginal cost and secure energy for both local and national consumers. This is a key benefit of the Scheme. <u>Landscape Visual Impact Assessment:</u> The Applicant's methodology is very clear on the approach to judgements and is transparent on the process with regard to taking account of sensitivity and magnitude. Regarding preparation of the LVIA and its methodology, the Applicant's methodology states in section 6.5 of ES Chapter 6: Landscape and Visual [AS-016] <i>"The significance ratings indicate a 'sliding scale' of the relative importance of the effect, with Major being the most important and Minimal being the least. Effects that are Major or Major Moderate are considered significant and "likely to influence the eventual decision" whilst those that are Slight or below are judged Not Significant and "of lesser concern" (GLVIA3, para 3.35)." With regard to moderate effects the methodology states that "Moderate effects are considered to be potentially significant and professional judgment is used to determine whether the effect in question is Significant or Not Significant, with analysis provided to justify the rating."</i> The methodology also states that <i>"an effect is likely to be assessed as Significant where the sensitivity of the receptor combined with magnitude of change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in Image 61 Significance of Effect) and is therefore judged more "likely to influence the eventual decision". It should be noted that whilst an effect may be assessed as Significant, it does not necessarily mean that such an impact would be unacceptable or should necessarily be regarded as an "undue consequence" (GLVIA3, para 5.40)".</i> <u>Grid Connection:</u> Having a Gate 1 connection offer means there is not yet a confirmed grid connection location or date to connect for the Scheme. However, project development will continue and The Applicant can apply again to move into Gate 2 in future rounds. The Government is clear that the Clean Power 2030 Action Plan and Connections Reform is not about stopping projects, but is about prioritising projects for 2030, while maintaining a robust pipeline beyond 2030. Projects which continue to demonstrate they are 'ready' are expected to be re-prioritised, especially as the government continues to refine its criteria for 'strategic alignment'. It is also anticipated that some projects currently in the queue may drop out (attrition). The Applicant will keep developing the Scheme with the aim of securing a Gate 2 connection in a future round, and the Applicant will keep local representatives and communities updated as matters progress. That the Scheme includes as associated development the proposed grid substation for the scheme reduces uncertainty around the deliverability of that connection, if the Scheme is to be consented.
BC5	Cumulative Impacts – Emphasis on High Grove Solar Farm and proliferation of solar development across Norfolk The Council has strong concerns that the cumulative landscape, visual and agricultural effects of multiple NSIPs, including Drovers, High Grove, and other energy infrastructure, have not been adequately assessed despite being required under EIA Regulations. Subsequently, the Council considers that significant cumulative effects are possible via extending the overall area of development,	ES Chapter 6: Landscape and Visual [AS-016] outlines the approach and details that cumulative effects may arise as a result of effects associated with the Scheme combining with effects associated with other developments. The list of cumulative developments was narrowed down to focus on those developments which are most likely to give rise to significant cumulative effects. A long-list was generated which was then refined into a short-list, which formed the basis of this assessment, as per the PINS Guidance on Cumulative Effects Assessment². These can be found in Table 2-3 Long and Short List of Cumulative Schemes, within ES Appendix 2.4: Cumulative Schemes [APP-136].

² Planning Inspectorate, 2024. Nationally Significant Infrastructure Projects: Advice on itage Effects Assessment



Reference number	Representation	Applicant response
	increasing the loss of agricultural land, and also through potentially increasing the extent of visibility of the two schemes by receptors.	Only one development, High Grove Solar, has the potential to result in significant cumulative effects on Landscape and Visual within the associated LVIA Study Area. Section 6.11 undertook a Cumulative Effects Assessment which included High Grove Solar Farm which concluded that there would be: • significant adverse visual effects during construction for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave; and • significant adverse landscape effects during construction and operation on the E6 North Pickenham Plateau LCA. Further collaboration with High Grove Solar Farm will be undertaken with regard to the planting approach for mitigation measures. The oLEMP [APP/7.11.1] states in paragraph 7.2.32 that <i>“planting mixes shown indicatively in the following section below will be reviewed further post consent and in collaboration with planting proposals for High Grove Solar Farm to ensure that there is a smooth transition of the “look and feel” between one solar farm and another.”</i> The smooth transition between High Grove Solar Farm and the Scheme would limit further cumulative effects upon landscape character by ensuring new planting is well considered, connected and characteristic of the local landscape. As set out in ES Chapter 11: Soils and Agriculture [AS-018] collectively across the four NSIP schemes (being High Grove Solar Farm, East Pye Solar, Norfolk Vanguard Offshore Windfarm (onshore elements) and Norfolk Offshore Boreas Windfarm (onshore elements) considered in the cumulative assessment there is the potential for more than 20ha of land of BMV to be permanently sealed over or irreversibly developed. This will result in a moderate adverse effect which is significant, as reported in the ES. This effect should, however, be considered in context. The estimated areas of agricultural land from the provisional ALC maps in Norfolk (479,000ha) and Breckland (107,000ha) are set out in Chapter 11 in Table 11-8 of section 11.8. As set out in section 11.11 of ES Chapter 11: Soils and Agriculture [AS-018], taking the average utilised agricultural area figures for the UK and applying that to Norfolk, then 335,000ha are farmed. The cumulative area involved with NSIP schemes (as mentioned above) amounts to about 1% of farmed land in the county. The effects on food production regionally and nationally are negligible, as set out in section 11.11.
BC6	During the previous statutory consultation, the Council's Landscape Consultant raised the view that the Vanguard & Boreas terrestrial works should be included as part of the cumulative effects assessment as the development sites sit within the same Landscape Character Area. The terrestrial works have been included as requested which is welcomed by the Council. The recommendation of the Planning Inspectorate in the Scoping Opinion that the applicant consult with local planning authorities and other statutory bodies on the relevant developments to include within the cumulative effects assessment was also supported, however, it is noted that no such direct consultation took place on the matter. Whilst the Council made suggestions in this regard as part of the previous statutory consultation response, this is considered to be a weakness of the submission.	The Applicant's LVIA consultation letter dated 07 January 2025 issued to Breckland Council outlined that <i>“High Grove Solar Farm has been identified as a cumulative scheme which will require consideration within a cumulative assessment. As part of the EIA process, the LVIA will undertake a cumulative assessment, which will consider both sites along with any other relevant cumulative developments identified as the assessment progresses.”</i> The Vanguard & Boreas terrestrial works were included in the cumulative schemes list proposed within the Preliminary Environmental Information Report (PEIR) submitted as part of the statutory consultation process. Breckland Council provided a statutory consultation comment (captured in Table 2-1 of ES Appendix 2.4: Cumulative Schemes [APP-136]) which requested the Vanguard & Boreas terrestrial works be considered within the cumulative effects assessment for the ES. The Vanguard & Boreas scheme was retained as a cumulative scheme for the ES, as detailed in Table 2-3 of ES Appendix 2.4: Cumulative Schemes [APP-136]. The cumulative schemes list was reviewed and updated prior to the submission of the ES to ensure it was up to date and accurate, in line with the methodology set out in ES Appendix 2.4: Cumulative Schemes [APP-136]. The Vanguard & Boreas NSIPs were considered as part of the scope of the cumulative landscape and visual assessment as they were listed as no. 2 and no. 3 in table 2-3 Long and Short List of Cumulative Schemes, within ES Appendix 2.4: Cumulative Schemes [APP-136]. However, only one proposed development, High Grove Solar Farm, was judged to have the potential to result in cumulative effects on Landscape and Visual receptors within the associated LVIA Study Area. With regard to the Vanguard & Boreas NSIPs, both the Vanguard & Boreas NSIPs have DCO consent. It is notable that generally, as outlined in the LVIA consultation



Reference number	Representation	Applicant response
		letter referred to above, operational and consented developments are treated as being part of the landscape and visual baseline. As such, the Vanguard & Boreas NSIPs are considered as part of the baseline within ES Chapter 6: Landscape and Visual [AS-016] .
BC7	The ES assesses, “The Scheme, taken cumulatively with the adjacent High Grove Solar scheme, would give rise to a significant impact on landscape character during the construction, operational, and decommissioning phases. Additionally, there is expected to be a short-term temporary cumulative visual effect on one Visual Receptor Group; however, the magnitude of cumulative visual effects is expected to lessen in the operational phase as mitigation planting matures”. It is noted that ES Chapter 6: Landscape and Visual concludes that the scheme would result in the following significant residual adverse cumulative impacts, cumulatively with High Grove Solar: 1. E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the two developments; and 2. VRG4: Great Palgrave and Little Palgrave: there are significant adverse effects for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the two developments.	The Applicant notes this comment and these significant effects remain alongside the implementation of embedded mitigation measures, in the long term. ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. Section 6.11 includes a Cumulative Effects Assessment which has assessed High Grove Solar Farm. Further collaboration with High Grove Solar Farm will be undertaken with regard to the planting approach for mitigation measures. The oLEMP [APP/7.11.1] states in paragraph 7.2.32 that “<i>planting mixes shown indicatively in the following section below will be reviewed further post consent and in collaboration with planting proposals for High Grove Solar Farm to ensure that there is a smooth transition of the “look and feel” between one solar farm and another.</i>” The smooth transition between High Grove Solar Farm and the Scheme would limit further cumulative effects upon landscape character by ensuring new planting is well considered, connected and characteristic of the local landscape. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. Mitigation measures have included: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and Study Area south of Bartholomew’s Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access; • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site; • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site’s context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider Study Area, and from PRoW and droves within the Site itself; • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRoW, roads and residential dwellings; • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2]. The Scheme would be offset from existing PRoW by a minimum of 15m, to respect the amenity and experience for PRoW users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme.



Reference number	Representation	Applicant response
		New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site; and As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRoW network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRoW network within the Study Area to provide recreational benefits.
BC8	The Council considers that a stringent balancing exercise, with particular emphasis in regard to the benefits and needs of the proposed development is required as part of the examination process.	The Applicant has applied the planning balance in the Planning Statement [APP/5.5.1] and considers that the identified substantial benefits of the Scheme outweigh the residual harms that would arise. Further, the CNP presumption means that these residual impacts are outweighed by the urgent need for the Scheme.
BC9	It is noted that the ES assesses significant adverse effects upon BMV land across the decommissioning phase of the Scheme cumulatively with High Grove Solar, East Pye Solar, Norfolk Vanguard Offshore Windfarm onshore elements and Norfolk Boreas Offshore Windfarm onshore elements.	As set out in the ES Chapter 11: Soils and Agriculture [AS-018] collectively across the four NSIP schemes (being High Grove Solar Farm, East Pye Solar, Norfolk Vanguard Offshore Windfarm (onshore elements) and Norfolk Offshore Boreas Windfarm (onshore elements) considered in the cumulative assessment there is the potential for more than 20ha of land of BMV to be permanently sealed over or irreversibly developed. This will result in a moderate adverse effect which is significant, as reported in the ES. This effect should, however, be considered in context. The estimated areas of agricultural land from the provisional ALC maps in Norfolk (479,000ha) and Breckland (107,000ha) are set out in Chapter 11 in Table 11-8 of section 11.8. As set out in section 11.11, taking the average utilised agricultural area figures for the UK and applying that to Norfolk, then 335,000ha are farmed. The cumulative area involved with NSIP schemes (as mentioned above) amounts to about 1% of farmed land in the county. The effects on food production regionally and nationally are negligible, as set out in section 11.11.
BC10	In addition to this proposal there are three other major solar farms across Norfolk, which are of a scale, which means they will need to be determined as Nationally Significant Infrastructure Projects (NSIPs). These projects include the neighbouring High Grove Solar Farm Project (1,400 ha); the East Pye Solar Farm in South Norfolk (1,110 ha); and the Tasway Solar Farm in South Norfolk (1,100 ha). This latter scheme is understood to have been paused as it has not received a Gate 2 Grid Connection Offer from the National Energy Systems Operator (NESO). The Council is particularly concerned that Norfolk is becoming a centre of concentrated solar development due to irradiance and grid factors, contrary to balanced spatial planning principles. Furthermore, these nationally significant projects could therefore result in the cumulative loss of over 4,000 ha of agricultural land across Norfolk. It is considered that this requires forensic examination.	The Applicant is aware of these NSIP projects in and has undertaken an assessment of likely cumulative effects for the relevant projects, provided in each of the ES Topic Chapters [AS-016 to APP-064] and is summarised in ES Chapter 18: Summary of Effects [APP-067]. ES Appendix 2.4: Cumulative Schemes [APP-136] confirms that the cumulative assessment includes, but is not limited to, High Grove Solar Farm and East Pye Solar Farm. ES Chapter 2: EIA Process and Methodology [APP-051] sets out the methodology for considering cumulative schemes in the EIA, which aligns with the PINS Advice on Cumulative Effects Assessment (September 2024). The methodology sets out three 'tiers' of development that should be considered in the cumulative assessment, acknowledging a decreasing level of certainty as to how 'reasonably foreseeable' the developments are to come forward. Tier 3 represents the least certain developments and require a project to be registered on the PINS programme of projects; at present, Tasway Solar Farm is not registered on the PINS website as an NSIP and therefore doesn't meet the 'least certain' criteria as a cumulative scheme. In accordance with PINS guidance, Tasway Solar Farm does not warrant inclusion in the assessment of cumulative effects as part of the EIA for the Scheme. Responding to the specific concern of cumulative agricultural land loss, this has been comprehensively considered within ES Chapter 11: Soils and Agriculture [AS-018] where a worst-case cumulative assessment has been applied. This sets out that there is the potential for permanent land loss of BMV quality from all the developments to exceed 20ha, which would result in a cumulative impact of a moderate adverse effect, which would be significant in EIA terms. As stated above, this effect should, however, be considered in context. The estimated areas of agricultural land from the provisional ALC maps in Norfolk (479,000ha) and Breckland (107,000ha) are set out in Chapter 11 in Table 11-8 of section 11.8. As set out in section 11.11, taking the average utilised agricultural area figures for the UK and applying that to Norfolk, then 335,000ha are farmed. The cumulative area involved with The Drovers, East Pye and High Grove amounts to about 1%



Reference number	Representation	Applicant response
		of farmed land in the county. The effects on food production regionally and nationally are negligible, as set out in section 11.11. Looking at impacts from the Scheme directly, ES Chapter 11: Soils and Agriculture [AS-018] concludes that, with embedded and additional mitigation measures in place, the Scheme itself would not result in any significant adverse effects on soil or agricultural land resources throughout its lifecycle. There will be some permanent land take associated with the National Grid Substation and Grid Connection Infrastructure, amounting to less than 5 ha of BMV land.
BC11	The Council requests: • Rigorous examination of cumulative landscape and agricultural impacts. • That the Examining Authority (ExA) implements an inter-relationship report mechanism, updated at each deadline, mirroring approaches in other NSIP examinations in other parts of the country (e.g. western Lincolnshire and the Outer Dowsing offshore wind proposal) and suggested in the Council's statutory consultation response (and rejected by the applicant). The Council considers such a report would enhance understanding of scheme interactions and the cumulative impact of development within the locality.	ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. Section 6.11 has undertaken a Cumulative Effects Assessment which includes High Grove Solar Farm. ES Chapter 11: Soils and Agriculture [AS-018] provides an assessment of the cumulative agricultural effects as a result of the Scheme in-combination with the identified cumulative schemes. This is provided at Section 11.11 of the ES chapter. Commitments are made within the management plans submitted as part of the DCO Application to collaborate with High Grove solar, where relevant and appropriate. Section 5.15 of the oCTMP [APP/7.7.1] commits to the preparation of a joint CTMP with High Grove Solar Farm in the event that the construction periods overlap (which is not considered likely) which will set out construction traffic management and control measures relevant to those areas where the construction vehicle routes for the respective schemes overlap. The oLEMP [APP/7.11.1] commits to collaboration with High Grove Solar Farm on the planting proposals to ensure that there is a smooth transition of the "look and feel" between the two Schemes. The oCEMP [APP/7.6.1] has been updated at Deadline 1 to include a commitment for the Applicant to collaborate with High Grove Solar Farm during the detailed design stage of the Scheme to explore mitigation measures across both projects and seek to achieve cumulative noise levels that do not exceed 35dB(A) at The Off Barn receptor during the operational phase. The Applicant confirms that it has prepared and submitted at Deadline 1 an inter-relationship report (Report on Interrelationships between Projects [APP/8.3]), which clearly sets out the cumulative interactions with High Grove Solar.
BC12	Agricultural Land and Food Production During the previous statutory consultation, the Council raised extensive concerns regarding the use of Best and Most Versatile (BMV) agricultural land, impacts on the farming economy, and lack of district scale assessment.	A council-wide assessment of agricultural land is provided in the ES Chapter 11: Soils and Agriculture [AS-018] at section 11.8. Table 11-8 provides a breakdown of land quality for the Council, based on the provisional maps. Section 11.8 sets out an assessment of the effects on food production across the Order limits and regionally/nationally and concludes a negligible residual effect on food production, which is not significant in EIA terms.
BC13	Whilst the applicant has provided details of an assessment which concludes the use of agricultural land is necessary, it is noted that the National Grid substation is proposed to be located within Field 27 which includes Grade 2 ALC. As previously iterated as part of the previous statutory consultation response, the Council considers that permanent infrastructure should be sited on the lowest quality agricultural land within the Order limits. It is also considered that the ES still does not provide: • District level quantification of BMV take; • Sufficient assessment of cumulative agricultural land loss from multiple NSIPs; or • Sufficient analysis of effects on local food production, tenancy disruption, and the functioning rural economy.	In respect of the siting of the National Grid Substation within Field 27, as identified this is proposed on land of Grades 2, 3a and 3b, as set out in the ES Chapter 11: Soils and Agriculture [AS-018] especially sections 11.8.35 to 11.8.42. The comments are noted, but siting of infrastructure is determined by a number of factors and, on the basis that much of the area will be restored, a design decision was taken by the Applicant. Land quality was fully recognised and was considered in the design evolution. There is a consequential adverse impact, as described in ES Chapter 11: Soils and Agriculture [AS-018]. The ES sets out details of council-level availability of agricultural land, including that of BMV quality, and it sets out an assessment of the local agricultural effects, taking a long-term view and assuming cereal crop production. This includes assessment of those businesses operating on the land now and a wider view of the effects on the land-based local economy, and nationally. An assessment of local NSIP schemes is presented in ES Chapter 11: Soils and Agriculture [AS-018], section 11.11. Four NSIP Schemes were considered likely to have relevant cumulative effects and were



Reference number	Representation	Applicant response
		considered, and the cumulative effect was assessed temporarily accounting for about 1% of the farmed area of Norfolk, which is not significant.
BC14	It is noted that the ES assesses significant adverse effects upon BMV land across the decommissioning phase of the Scheme cumulatively with High Grove Solar, East Pye Solar, Norfolk Vanguard Offshore Windfarm onshore elements and Norfolk Boreas Offshore Windfarm onshore elements.	The Applicant notes this comment and has responded to the point made above.
BC15	The applicant's response reiterates national scale percentages but does not address localised implications, which the Council considers essential. The Council considers that this remains a fundamental issue requiring detailed scrutiny during examination.	ES Chapter 11: Soils and Agriculture [AS-018] sets out an assessment of the effects, identifying national, county and district land availability and quality (Table 11-8). The cumulative assessment section (11.11) sets out an assessment at the county level. The request for a more localised analysis is noted and the Applicant has undertaken this and has submitted the Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land Quality [APP/8.9] at Deadline 1, which shows that there are no significant implications for the Environmental Statement. The request for a more localised analysis is noted and the Applicant will seek to provide a breakdown at a future Deadline.
BC16	Breckland Council defers to the advice of Natural England in regard to the technical details of the potential impacts upon agricultural land and soils.	The Applicant notes this comment.
BC17	Insufficient demonstration of public benefits at district level, including limited local energy benefit and unclear Community Benefit Fund structure. In its response to the previous statutory consultation, the Council highlighted it considers that community benefits at a local level are of upmost importance when considering the scale of the proposals and potential for impacts and upheaval. The applicant has responded by referring to proposed permissive paths and proposals to promote local apprenticeships and training schemes, which it considers sufficient in this regard. Whilst these objectives are supported, the Council considers that more could and should be done in terms of public benefits at a local level.	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. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider scale benefits of the Scheme. The electricity generated by the Scheme would be exported to the national grid, at which point it would cease to be under the Applicant's control and would instead be dispatched and distributed by the operator in accordance with supply and demand across the network. The Scheme will make a contribution to meeting the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Applicant is committed to ensuring that communities benefit from the Scheme. As set out in the Planning Statement [APP/5.5.1], the Applicant has committed to providing a Community Benefit Fund. 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 Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process).. Efforts to provide specific benefits in locally impacted communities are set out in the oESSCS [APP-195] (for employment and economy), in the oLEMP [APP/7.11.1] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes (as secured in the oPRoWPPMP [APP-192]), or through the Community Benefit Fund (separate to the DCO process).
BC18	The Council also previously raised a concern that no direct benefits to Breckland in regard to the provision of renewable energy to existing/forthcoming dwellings or commercial properties had been demonstrated. Whilst the applicant has responded to state that the Scheme will connect to the National Electricity Transmission System, it is considered that more should be done to at least explore direct benefits to the host district.	The Applicant refers to its response above in relation to the points made by the Council here.



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BC19	The Council made the following comments as part of the previous statutory consultation response: “10.4 Breckland Council is of the view that compensation packages befitting of the level of impact experienced by residents and businesses directly affected by the proposals during construction, operation and decommissioning must be administered. The Council anticipates that the Applicant will engage with the relevant parties, with details to be provided within the ES and across any other relevant sections of the DCO submission.”	The Applicant notes its previous response to this comment in the Consultation Report Appendix G: Section 42 - Responses Received and Applicants Response [APP-037] and has responded to the further points made by the Council on this matter in the corresponding rows below.
BC20	The applicant has responded only to refer to the production of management plans as requirements of the draft DCO. The Council does not consider this to be a sufficient response. The Council considers that the applicant should commit to providing appropriate compensation for businesses and communities adversely affected by the proposed development.	The Applicant is committed to ensuring that communities benefit from the Scheme. As set out in the Planning Statement [APP/5.5.1], the Applicant has committed to providing a Community Benefit Fund. 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 Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). The mitigation that is required for the Scheme is detailed in the suite of management plans, which are available for review and comment by the Council, hence the Applicant's previous reference to those documents.
BC21	The Council welcomes the commitment of the applicant to provide a Community Benefit Fund (CBF), however, considers the details provided to date to be insufficiently vague. Given that the lifetime of the project is expected to be 60 years, it is considered that a significant financial commitment will be required if lasting benefits are to be realised, especially when accounting for inflation over such a long period of time. It is considered that the applicant must ensure all stakeholders/communities are made aware of such funds and have the opportunity to make appropriate bids.	The Applicant notes this comment. The Applicant will ensure that all stakeholders are made aware of the community benefit fund in place and are able to have the opportunity to input where appropriate. Index linking the fund to inflation will be considered by the Applicant.
BC22	It is understood that a CBF, whilst a valuable and welcomed part of infrastructure projects, cannot be formally scoped into an ES in the way that environmental effects or mitigation measures are. A CBF is not a mitigation measure for environmental effects, nor is it a statutory requirement. It is a voluntary socio-economic contribution, and therefore not considered part of the environmental information required in the ES.	The Planning Statement [APP/5.5.1] confirms that the Applicant has committed to providing a Community Benefit Fund should consent be granted for the DCO Application. The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining the DCO Application. However, it will be available to fund local projects.
BC23	However, it is considered that the CBF can be included as part of the "Commitments Register" ES appendix, which clarifies the Applicant's commitments to address environmental and other benefits. It is considered that this should include details of how the fund will be governed and set up which would provide more certainty and give local communities more confidence in the process at the outset of the DCO process. It is noted that the CBF has not been included in the draft Commitments Register, despite this being raised as a matter of importance as part of the Council's previous statutory consultation response. It is considered that the following should be provided and addressed during examination: • "Commitments Register" ES appendix, providing clarification on how it will be secured, discharged and monitored; and • A separate Community Benefits Statement (though not a statutory requirement).	As confirmed in the Planning Statement [APP/5.5.1], the Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). It would, therefore, be inappropriate to include the Community Benefit Fund in the Commitments Register [APP-180] and/or submit a separate Community Benefits Statement into the examination. In relation to Breckland Council's request for details of how the Community Benefit Fund will be governed and set up, the Applicant notes that a local foundation will likely independently determine the local initiatives to provide services to the community that are chosen to benefit from the Community Benefit Fund. The Applicant also notes that the 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. The Applicant welcomes further engagement with Breckland Council in relation to the Community Benefit Fund.



Reference number	Representation	Applicant response
BC24	Landscape Impacts During the previous statutory consultation, the Council raised extensive concerns regarding the landscape and visual impacts of the proposal. The Council's Landscape Consultant (Peter Richards Partnership) has assessed the proposal, including the response to the Council's Statutory Consultation comments (Consultation Report Appendix G: Section 42 – Responses Received and Applicants Response), and considers the following issues to remain unresolved:	The Applicant notes this comment and responds to the specific points raised below.
BC25	Assumptions & Limitations: Methodology identification & assessment of Local Landscape Character Areas (LLCAs) There are significant reservations regarding the LVIA relying on just the District Level Landscape Character Areas.	ES Chapter 6: Landscape and Visual [AS-016] has focussed on district-level landscape character assessments because they are a material consideration and have been subject to public scrutiny. For the ES, the assessors outlined that the district landscape character assessments were still relevant, again noting that GLVIA para 5.13 states that "<i>justification should be provided for any departure from the findings of an existing established LCA.</i>" GLVIA para 5.15 continues adding that "<i>existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA - for example by drawing out more clearly the key characteristics that are most relevant to the proposal. Completely new supplementary Landscape Character Assessment work covering the whole Study Area would only be required when there are no existing assessments or when they are available but either have serious limitations that restrict their value or do not provide information at an appropriate level of detail</i>". For the purposes of the Scheme and assessment within ES Chapter 6: Landscape and Visual [AS-016], the Applicant does not consider that there are serious limitations with the Breckland Landscape Character Assessment 2007 or that further detail is required. Further detail is provided in ES Chapter 6 explaining further site observations and that such observations were consistent with the relevant LCA in the published assessment. The Breckland Landscape Character Assessment 2007 is at a suitable scale for the LVIA and, as per paragraph 5.15, supplemented with site observations from fieldwork to "<i>draw out more clearly the key characteristics that are more relevant to the proposal.</i>"
BC26	The Landscape Chapter Methodology notes at Para 6.4.26 (page 22): "Paragraphs 5.13-5.15 of GLVIA, 3rd edition indicates that landscape character studies at a national or regional level are best used to "set the scene" and understand the landscape context. It indicates that LPA assessments provide more detail and that these should be used to form the basis of the assessment of effects on landscape character with (appropriately justified) adaptation, Refinement and interpretation where required."	The Applicant notes this comment.
BC27	It is considered that this is a disingenuous presentation of GLVIA3 as most importantly the report does not include GLVIA3 Para 5.16. This concluding paragraph on the appropriate level of information to be considered notes, "Even where there are useful and relevant existing Landscape Character Assessments and historic landscape characterisations, it is likely that it will be necessary to carry out specific and more detailed surveys of the site itself and perhaps its immediate setting or surroundings."	GLVIA3 and all of its constituent paragraphs, where relevant, form a key guidance tool which underpins the methodology and assessment approach detailed within ES Chapter 6: Landscape and Visual [AS-016]. The Applicant notes this comment but does not consider that there are serious limitations with the Breckland Landscape Character Assessment, 2007 or that further detail is required. Additional narrative has been included within the assessment, alongside the identified present published characteristics, which forms a reliable and up-to-date record of the LCA's baseline conditions.
BC28	A central tenet of GLVIA3 over earlier publications of GLVIA was the need for proportionality. References include but are not limited to: 1. Preface, fourth para;	The Applicant notes this comment.



Reference number	Representation	Applicant response
	2. Para 1.17 refers to “an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects”; 3. Para 1.20 “the approach and methodology adopted are appropriate to the particular circumstances”; and 4. Para 3.11 with regard LVIA scoping notes, fifth bullet point: “the extent and appropriate level of detail for the baseline studies that is reasonably required to assess the landscape and visual effects of the proposed development”.	
BC29	The project is of such a scale and level of importance that it is identified as a “Nationally Significant Infrastructure Project”. Sitting at the higher end of the development scale it is considered that the assessment, to be proportionate and in accordance with landscape industry good practice and guidelines, should include the assessment of Local Landscape Character Areas.	The Applicant notes this comment. With regard to the inclusions of Local Landscape Character Areas, this comment is similar to comment reference BC25 above and has been addressed.
BC30	This concern and request is reinforced when it is considered that the applicant involved in the High Grove Solar farm project has from the outset noted their LVIA will assess Local Landscape Character Areas.	The Applicant notes this comment The Applicant does not consider that there are serious limitations with the Breckland Landscape Character Assessment 2007 or that further detail is required. Additional narrative has been included within the assessment, alongside the identified present published characteristics, which forms a reliable and up-to-date record of the LCA's baseline conditions.
BC31	Assumptions & Limitations 2: Methodology & Significance of Effects The LVIA Methodology provides a helpful Diagram of Significance in Diagram 6.1 – entitled ‘Significance of Effect’. There is concern that the authors provide no supporting text on what is considered to be: • Major significance; • Major-Moderate significance; • Moderate significance; • Slight significance and • Minimal significance.	The Applicant notes this comment. This is referred to as Image 6-1 Significance of effect. ES Chapter 6: Landscape and Visual [AS-016] states that “<i>Significance indicates the importance or gravity of the effect. The process of forming a judgement as to the degree of significance of the effect is based upon the assessments of magnitude of effects and sensitivity of the receptor to come to a professional judgement of how important this effect is.</i> ES Chapter 6: Landscape and Visual [AS-016] does not provide supporting text on the level of significance. Significance is judged to be based on the consideration of the sensitivity and magnitude of change criteria and professional judgement and as such no clear terms should be defined.
BC32	There is also concern in that the supporting text in Para 6.2.13 does not clarify which of the above levels of effect is considered Significant and states: “An effect is likely to be assessed as Significant where the sensitivity of the Receptor combined with magnitude of change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in Diagram 6.1 above) and is therefore judged more “likely to influence the eventual decision”.	The paragraph quoted is para 6.5.16 of ES Chapter 6: Landscape and Visual [AS-016]. ES Chapter 6: Landscape and Visual [AS-016] states what levels of effect are considered significant or potentially significant in paragraph 6.5.15: “<i>Effects that are Major or Major-Moderate are considered significant and “likely to influence the eventual decision” whilst those that are Slight or below are judged Not Significant and “of lesser concern” (GLVIA3, para 3.35). Moderate effects are considered to be potentially significant and professional judgment is used to determine whether the effect in question is Significant or Not Significant, with analysis provided to justify the rating.</i>”
BC33	The inclusion of “likely” and “towards” provides no transparent explanation of how the assessor arrives at a concluding judgement. This approach is considered far from the central tenant of GLVIA3 which states in Para 2.24: “there is a need for the judgements that are made to be reasonable and based on clear and transparent	The Applicant notes this comment. The inclusion of the terms “likely” and “towards” in the ES Chapter 6: Landscape and Visual [AS-016] are standard and typified in various publications including GLVIA Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment [GLVIA3] Technical Guidance Note LITGN 2024-01 published August 2024. Further detail has been provided in ES Chapter 6: Landscape and Visual



Reference number	Representation	Applicant response
	methods so that reasoning applied at different stages can be traced and examined by others.”	[AS-016] as to the judgement made for the assessment of landscape and visual impacts with a supporting narrative.
BC34	The methodology, and in particular the judgement on resulting effects, is not considered transparent. It is recommended that the methodology be revised to remove the ambiguity in Para 6.2.13 and the methodology should provide clear and transparent text on the resulting levels of effect.	There is no paragraph 6.2.13 within ES Chapter 6: Landscape and Visual [AS-016] . Please refer to the above responses with regard to clarity and direction to the LVIA approach on resulting levels of effect. Full detail is provided within Section 6.5 of ES Chapter 6: Landscape and Visual [AS-016] .
BC35	Assumptions & Limitations 3: Supporting Photography (1) Some of the photographs were taken at a time of day and in a direction that has resulted in photographs that do not provide clear views of the landscape as a combination of contrast and shadows effectively screen the landscape detail. Examples include: 1 Representative Viewpoint 16 – left hand side; and 2 Representative Viewpoint 13 – centre & left hand side.	The Applicant notes this comment. The winter photography within ES Chapter 6: Landscape and Visual [AS-016] was constrained by daylight hours; however, these photographs have been lightened slightly to reduce the level of contrast / shadow and the images have been supplemented by summer photography from the same viewpoints. Representative and illustrative viewpoint photography taken during winter and summer months has been included within the LVIA to record the baseline conditions of the Site and surrounding study area. The viewpoint photographs are a visual record of a particular viewpoint at one specific time and location, therefore shadowing, contrast and exposure can all be affected by variations in weather conditions.
BC36	Assumptions & Limitations 4: Supporting Photography (2) The LVA uses late winter photographs for the visual receptors considered. Good practice encourages the use of both winter and summer photographs. However, this limitation is considered acceptable in the context of the development's proximity to public viewpoints identified and their level of sensitivity.	The Applicant notes this comment. Both summer and winter photographs have informed the visual assessment of the ES Chapter 6: Landscape and Visual [AS-016] demonstrating seasonal variations in vegetation screening. Both summer and winter photography have been used for a number of visualisations of the Scheme included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045].
BC37	A summary of findings of the review of the scope of the assessment. Scoped out effects: The LVA notes the following effects are scoped out: Visual receptors outside the study area/ZTV. Assumptions & Limitations: What is included within the Development Proposals It is suggested that the LVA be amended with particular regard to: Security Fence: Details of construction, colour, form (important given the height is noted as being 3.4m) – no additional information provided in the LVA.	The Applicant notes this comment. For clarity, ES Chapter 6: Landscape and Visual [AS-016] is an LVIA, not an LVA. It is clearly stated that “based on fieldwork observations, it is judged that effects on landscape and visual receptors outside the ZVI [Zone of Visual Influence] described above would be Negligible and, as such, are not assessed in further detail in this ES Chapter. This does not mean that there would be no potential visibility outside the ZVI indicated, but rather that any visibility beyond the ZVI would be minimal or at such a distance that visibility would not affect views.”. This approach was also proposed within the Scoping Report and PEIR. Details of this can be found within the ES Appendix 2.1: EIA Scoping Opinion Request [APP-133]. As described in ES Chapter 5: The Scheme [APP/6.1.2], to assist the assessment and ensure good design - scheme outcomes and Design Principles have been developed to guide (within the parameters) the size, type and colour of elements of the Scheme. Whilst security fencing is likely to be dark green, grey or black the final details would be approved by the relevant planning authority pursuant to the relevant requirements in the draft DCO [APP/3.1.1]. The maximum height of the security fencing is 3m, as outlined within ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameters and Commitments [APP/5.8.1]. Metal palisade security fencing around Conversion Units, BESS and substations, which will be 3m height and is secured within the Design Principles, Parameters and Commitments [APP/5.8.1]. For Solar PV Arrays and Conversion Units, there would be deer fencing comprising wire mesh and wooden post fencing with a maximum height of 2.5m around individual fields or groups of fields and is secured within the Design Principles, Parameters and Commitments [APP/5.8.1].



Reference number	Representation	Applicant response
BC38	A summary of findings of the review of the actual assessment of effects Visual Assessment The viewpoint assessment provided visual findings using site work and photographs undertaken at times when the trees were without leaf.	The Applicant notes this comment. Summer photography has also been taken to support the ES Chapter 6 Landscape and Visual [APP/6.2.2], and these photographs, alongside the winter viewpoints, have informed the visual assessment providing in winter photographs a "worst case scenario" and demonstrating seasonal variations for summer views.
BC39	There is agreement with the report that this represents the worst-case scenario. Given the endemic nature of Ash Die-back it is considered appropriate for the assessment to note alongside each view the likely change which might be brought about by the decline to most Ash trees within a view.	The Applicant's arboriculturist has advised that ash is present generally as a minor component of some woodlands adjacent to and within the Site, many of which are more recent plantations. Of the 165 number of individual ash trees across the Site, just 25 are assessed as category U, and therefore are expected to have under 10 years remaining life expectancy. No woodlands bounding the Site were assessed as being dominated by ash, or featuring ash as a major component of the species mix. None of the woodlands appeared to be in a condition which could be expected to deteriorate significantly as a result of ash dieback. Consideration has been given to the likely negligible change in the view as a consequence of ash dieback and this is reflected in the future baseline and assessment detailed in Section 6.6 of ES Chapter 6 Landscape and Visual [APP/6.2.2].
BC40	The resulting assessment of resulting visual effects for Construction, Year 1, Year 15 and Cumulative Scenarios is considered reasoned and, other than the issues noted below there are no issues with the resulting visual effects.	The Applicant notes this comment.
BC41	Representative Viewpoint Group 1: Central Site area (High-Medium Sensitivity) There is disagreement with the assessment recording/identifying the users of the public rights of way crossing the site as High-Medium Sensitivity. It is considered that there may be locations where the views are so channelled and/or screened/filtered that the sensitivity may be Medium, but it is also considered that taken as a whole this receptor groups' link to views of the countryside around the footpath is such, that these receptors are High Sensitivity and not High-Medium as recorded.	With regard to the comment referring to "Representative Viewpoint Group 1"; it is understood that this relates to Visual Receptor Group 1. The sensitivity of Visual Receptor Groups (VRG) have been assessed using a combination of professional judgement and the LDA methodology outlined within the ES Chapter 6: Landscape and Visual [AS-016]. Section 6.6 outlines that VRG 1 is of High-medium Sensitivity and includes: <i>"Users of PRow within the Site such as PRow South Acre RB1 (also shown as Petticoat Drove), South Acre RB2, South Acre RB5, and Swaffham RB1 (also shown partly as Fincham Drove). Road users along Narford Lane, River Road and stretches of the A1065. A single residential dwelling known as Keepers Cottage. Cyclists along a short section of the Rebellion Way Cycle Route. Walkers along a short section of the Castle Acre Circular Walk."</i> As per LDA methodology, High sensitivity receptors are "Visitors to valued viewpoints or routes, which people might visit purely to experience the view, e.g. promoted or well-known viewpoints, routes from which views that form part of the special qualities of a designated landscape can be well appreciated; key designed views; panoramic viewpoints marked on maps." VRG 1 does not include 'valued' viewpoints, is not within a designated landscape, does not include key designed views or include panoramic viewpoints marked on a map. Therefore, VRG 1 is of High-Medium sensitivity as per Table 6-4 in ES Chapter 6: Landscape and Visual [AS-016].
BC42	There is agreement with the assessment of Visual effects to Viewpoint Group 1 (VGR1) as Major-Moderate Significant adverse in the: - Construction & Decommissioning - Operational Phase – Short Term - Operational Phase – Medium Term (Recorded as Major-Moderate to Moderate adverse Significant)	The Applicant welcomes this comment.



Reference number	Representation	Applicant response
BC43	There is disagreement with the assessment reducing the significance of effect to Moderate (and not significant) in the Operational Phase - Long Term (see Table 6-11 Summary of landscape & visual effects, page 94). Given the visual receptors will have lost and/or severely reduced their visual connection with the baseline agricultural landscape, and walkers and riders on the right of way will no doubt be aware they are passing through a series of fields occupied by solar panels, it is considered that the Operational Phase – Long Term effect would remain significant adverse - a minimum of Major-Moderate.	ES Chapter 6: Landscape and Visual [AS-016] Table 6-11 states that for Visual Receptor Group (VRG) 1 the effects for operation medium term have been assessed to be Major-Moderate to Moderate (Significant) and Operation long term effects have been assessed to be Moderate (not Significant). The overall significance lessens due to a reduction in scale of effect as a consequence of mitigation planting outlined in paragraph 6.8.146 of the ES Chapter 6: Landscape and Visual [AS-016] below: <i>"In the long term, the scale of effect would lessen as new mitigation planting and landscape management regimes provide enhanced visual screening of the Scheme, for nearby receptors. PRow and the droves would be well screened from nearby Solar PV Arrays due to development offsets combined with the maturation of hedgerow and tree planting. New hedgerow proposed within Field 4 would be fully established and heavily filter visibility of nearby Solar PV Arrays situated near to PRow South Acre RB2 and RB5. New hedgerow planting aligning PRow within Field 4 would mean visibility across Field 4 is greatly reduced, when compared to the baseline view, however mitigation planting is required for screening and preventing direct short distance views of Solar PV Arrays adjacent to the nearby PRow. Long term visual effects on the wider VRG would be, in the worst case, medium-small scale over a wide extent of the Receptor group. These effects would be medium to low magnitude, Moderate significance and Adverse. This effect is not significant."</i>
BC44	Landscape Assessment There are significant reservations about the robustness of the assessment approach as it has not identified Local Landscape Character Areas (see comments above). With regards to the assessment of the six District Level Character Areas it is considered that the findings are generally well reasoned and acceptable with the exception of:	The Applicant notes this comment. ES Chapter 6: Landscape and Visual [AS-016] has focussed on district-level landscape character assessments because they are a material consideration and have been subject to public scrutiny. For the ES, the assessors outlined that the district landscape character assessments were still relevant, again noting that GLVIA para 5.13 states that <i>"justification should be provided for any departure from the findings of an existing established LCA."</i> GLVIA para 5.15 continues adding that <i>"existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA - for example by drawing out more clearly the key characteristics that are most relevant to the proposal. Completely new supplementary Landscape Character Assessment work covering the whole Study Area would only be required when there are no existing assessments or when they are available but either have serious limitations that restrict their value or do not provide information at an appropriate level of detail"</i>. For the purposes of the Scheme and assessment within ES Chapter 6: Landscape and Visual [AS-016], the Applicant does not consider that there are serious limitations with the Breckland Landscape Character Assessment, 2007 or that further detail is required. Further detail is provided in ES Chapter 6 explaining further site observations and that such observations were consistent with the relevant LCA in the published assessment. The Breckland Landscape Character Assessment 2007 is at a suitable scale for the LVIA and, as per paragraph 5.15, supplemented with site observations from fieldwork to <i>"draw out more clearly the key characteristics that are more relevant to the proposal."</i>
BC45	Effects on the Site, D1: Swaffam Heath LCA & E6: North Pickenham Plateau: The application site straddles parts of the District Level Landscape Character Areas of D1 and E6. In the Landscape Chapter Assessment of Landscape Effects the applicant records significant adverse effects from the Construction Phase and into the Operational Phase – Long Term, but then notes the effects on the wider District Character Assessment of Areas D1 and E6 are "not significant" – see Paras 6.6.114 – 6.6.121.	As stated within Section 6.8 and Table 6-11 of ES Chapter 6: Landscape and Visual [AS-016], the LCA is assessed on two levels to provide a greater level of detail and transparency within the assessment. The LCA is assessed on a site wide scale, i.e. effects upon the LCA within the Order limits, and also on a LCA wide scale, i.e. beyond the Order limits. Judgement and assessment narrative associated within LCA assessments within the Site and outside of the Site are included in detail within Section 6.8 of the ES Chapter 6: Landscape and Visual [AS-016].
BC46	It is considered that these findings are not robust as it is self-evident that a significant effect does not always stop at a site boundary.	As stated within Section 6.8 and Table 6-11 of ES Chapter 6: Landscape and Visual [AS-016], the LCA is assessed on two levels to provide a greater level of detail and transparency within the assessment. It is judged that the Scheme would potentially lead to significant adverse landscape effects upon the LCA within the Site given that this is the land being developed upon – this is reflected by the 'limited' extent of effect outlined



Reference number	Representation	Applicant response
		within Table 6-11. This effect would change to not significant beyond the Order limits when taking into account the existing landscape features and extensive proposed planting, which would greatly increase the screening effect and therefore limit the potential perceptual impacts of the Scheme upon the nearby landscape.
BC47	It is considered that this finding has come about because, as noted earlier, the assessment does not identify suitably granular Local Landscape Character Areas.	ES Chapter 6: Landscape and Visual [AS-016] has focussed on district-level landscape character assessments because they are a material consideration and have been subject to public scrutiny. For the ES, the assessors outlined that the district landscape character assessments were still relevant, again noting that GLVIA para 5.13 states that "<i>justification should be provided for any departure from the findings of an existing established LCA.</i>" GLVIA para 5.15 continues adding that "<i>existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA - for example by drawing out more clearly the key characteristics that are most relevant to the proposal. Completely new supplementary Landscape Character Assessment work covering the whole Study Area would only be required when there are no existing assessments or when they are available but either have serious limitations that restrict their value or do not provide information at an appropriate level of detail</i>". For the purposes of the Scheme and assessment within ES Chapter 6: Landscape and Visual [AS-016], the Applicant does not consider that there are serious limitations with the Breckland Landscape Character Assessment, 2007 or that further detail is required. Further detail is provided in ES Chapter 6 explaining further site observations and that such observations were consistent with the relevant LCA in the published assessment. The Breckland Landscape Character Assessment 2007 is at a suitable scale for the LVIA and, as per paragraph 5.15, supplemented with site observations from fieldwork to "<i>draw out more clearly the key characteristics that are more relevant to the proposal.</i>"
BC48	Effects on the B7 River Nar Tributary Farmland LCA: No comment Effects on the F1 River Nar Valley LCA: No comment Effects on the I9 Little Massingham & Castle Acre LCA: No comment	The Applicant welcomes this comment.
BC49	A summary of findings of the presentation of the assessment With the exception of the LVIA Methodology deficiencies noted above the assessment is presented with clearly structured text, supporting figures, tables and with reference/regard to supporting computer generated images (although photomontages and photos lack annotation).	The representative and illustrative viewpoint photography has been annotated, as shown within ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088] .
BC50	The photomontages methodology appears to be in accordance with the Landscape Institute TGN 06/19.	The Applicant welcomes this comment.
BC51	The Methodology's reference to scale of effects in Scale, Extent, Duration (considerations) and Resulting Magnitude of Effect in Diagram 6.2 is not clear/considered transparent and the text within the assessment providing judgements does not clearly explain how these considerations come together to arrive at a balanced judgement.	The assessment of effects outlines the sensitivity of the receptor and then makes a judgement, using LDA methodology, on magnitude of effect taking into account the scale, extent and duration of the potential effect. The magnitude and sensitivity of the receptor combine to reach a judgement on significance. This is outlined in full within ES Chapter 6: Landscape and Visual [AS-016] .
BC52	The LVIA Methodology It is considered that the assessment should have identified and assessed effects for Local Landscape Character Areas.	ES Chapter 6: Landscape and Visual [AS-016] has focussed on district-level landscape character assessments because they are a material consideration and have been subject to public scrutiny. For the ES, the assessors outlined that the district landscape character assessments were still relevant, again noting that GLVIA para 5.13 states that "<i>justification should be provided for any departure from the findings of an existing established LCA.</i>" GLVIA para 5.15 continues adding that "<i>existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA - for example by drawing out more clearly the key</i>



Reference number	Representation	Applicant response
		<i>characteristics that are most relevant to the proposal. Completely new supplementary Landscape Character Assessment work covering the whole Study Area would only be required when there are no existing assessments or when they are available but either have serious limitations that restrict their value or do not provide information at an appropriate level of detail".</i> For the purposes of the Scheme and assessment within ES Chapter 6: Landscape and Visual [AS-016], the Applicant does not consider that there are serious limitations with the Breckland Landscape Character Assessment, 2007 or that further detail is required. Further detail is provided in ES Chapter 6 explaining further site observations and that such observations were consistent with the relevant LCA in the published assessment. The Breckland Landscape Character Assessment 2007 is at a suitable scale for the LVIA and, as per paragraph 5.15, supplemented with site observations from fieldwork to <i>"draw out more clearly the key characteristics that are more relevant to the proposal."</i>
BC53	As noted earlier in this report the central tenant of GLVIA3 stated in Para 2.24 is, "there is a need for the judgements that are made to be reasonable and based on clear and transparent methods so that reasoning applied at different stages can be traced and examined by others."	The Applicant notes this comment.
BC54	The methodology, and in particular the judgement on resulting effects, is not considered transparent. It is recommended that the methodology be revised to remove the ambiguity in Para 6.2.13 and the methodology should provide clear and transparent text on the resulting levels of effect.	The Applicant's methodology is very clear on the approach to judgements and is transparent on the process with regard to taking account of sensitivity and magnitude. The Applicant's methodology states in section 6.5 of ES Chapter 6: Landscape and Visual [AS-016] <i>"The significance ratings indicate a 'sliding scale' of the relative importance of the effect, with Major being the most important and Minimal being the least. Effects that are Major or Major Moderate are considered significant and "likely to influence the eventual decision" whilst those that are Slight or below are judged Not Significant and "of lesser concern" (GLVIA3, para 3.35)." With regard to moderate effects the methodology states that "Moderate effects are considered to be potentially significant and professional judgment is used to determine whether the effect in question is Significant or Not Significant, with analysis provided to justify the rating."</i> The methodology also states that <i>"an effect is likely to be assessed as Significant where the sensitivity of the receptor combined with magnitude of change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in Image 61 Significance of Effect) and is therefore judged more "likely to influence the eventual decision". It should be noted that whilst an effect may be assessed as Significant, it does not necessarily mean that such an impact would be unacceptable or should necessarily be regarded as an "undue consequence" (GLVIA3, para 5.40)".</i>
BC55	Mitigation: It is considered that the assessor should recognise the potential benefits of colour studies to inform the best choice of colours for the substation buildings/structures (refer to Landscape Institute Technical Information Note 04/2018).	As described in ES Chapter 5: The Scheme [APP/6.1.2] to assist the assessment and ensure good design, scheme outcomes and Design Principles have been developed to guide (within the parameters) the size, type and colour of elements of the Scheme. As outlined within Design Principles, Parameters and Commitments [APP/5.8.1] document, it states that <i>"external finishing / materials to be in keeping with the prevailing surrounding environment. The exact materials / colour will be agreed with the relevant planning authority prior to construction but will be carefully selected to sit as discreetly as practicable within the landscape."</i>
BC56	The following detail is considered necessary to allow for a full assessment of the proposals: - Assessment of Operational/Short Term effects; - Assessment of Local Landscape Character Areas; - Assessment/Consideration of the Mitigation provided by building colours;	ES Chapter 6: Landscape and Visual [AS-016] does include an assessment of operational/short term effects. With regard to Local Landscape Character Areas, the Applicant notes this comment. This comment is similar to comment reference BC25 above and has been addressed. With regard to building colour, the Applicant notes this comment. This comment is similar to comment reference BC55 above and has been addressed.



Reference number	Representation	Applicant response
	- Clarification of Figures 6.5a & 6.5b as to why they appear to show exactly the same ZTV findings; and - Better photographs where contrast is such that detail is lost within the photographs taken (e.g. Representative Viewpoint 16 – left hand side).	With regard to ZTV's these have been renamed to ES Figure 6.5: Zone of Theoretical Visibility - DTM [APP-082] and ES Figure 6.6: Zone of Theoretical Visibility - DSM [APP-083] for greater clarity. Both ZTVs show very different ZTV findings. With regard to photography and contrast, the Applicant notes this comment. This comment is similar to comment reference BC35 above and has been addressed.
BC57	It is considered that the visual and landscape benefits of placing the diverted cables of the current 400Kv overhead underground instead of on new pylons should be considered. There is also a need to be cautious of planting along the footpath on the approaches to substations and pylons to prevent framing and accentuating of the views to the substations.	Paragraph 4.3.8 of ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] states that “undergrounding of either the existing or the proposed 400kV line has not been explored as an option, as the Site is not within a National Landscape, and there are no significant effects arising from the proposed new OHL” as summarised in ES Chapter 18: Summary of Effects [APP-067]. The extent, planting approach and typology of landscape mitigation is outlined within the oLEMP [APP/7.11.1]. Proposed planting areas within close proximity to the proposed substations and Grid Connection Infrastructure aim to restrict visibility from nearby PRow and screen views of the Scheme once matured, not accentuate or frame views. New planting around the National Grid Substation and Customer Substation comprises extensive new tree and hedgerow infill planting and gapping up along the existing field boundaries. In addition to this, new linear native woodland blocks are proposed inside the existing field boundaries, along the eastern and western edges of Field 27 and also scrub and copse planting is proposed within the northern area of Field 27, in order to screen and filter potential views of the taller elements of the Scheme from nearby PRow. This approach serves to reinforce and enhance the existing vegetated character of the Scheme and other PRow within the Site, as well as strengthening the wider green infrastructure network.
BC58	As per the above comments, it is considered that that further work is required if landscape and visual impacts are to be adequately assessed in the DCO examination.	A full and robust assessment of potential landscape and visual effects has been undertaken and is detailed, in full, within ES Chapter 6: Landscape and Visual [AS-016].
BC59	Uncertainty arising from the Scheme's grid connection position It is understood that the proposed development currently benefits only from a Gate 1 grid connection offer from the National Energy Systems Operator (NESO), with a Gate 2 application having recently been refused. This is in contrast with other regional NSIPs such as High Grove Solar Farm which is understood to benefit from a Gate 2 grid connection offer. It is understood that the refusal was due to potential over subscription of solar farms. A Gate 1 offer is an indicative connection date, meaning there is no firm timeline for grid access. The development will therefore not have the required land rights, and its connection date is dependent solely on when it applied for grid. As such, the development will face a higher risk of delays, as Gate 2 projects will take precedence.	A reason for receiving a Gate 1 notification was not provided by NESO. Notwithstanding this, the Applicant issued a document to Local Authority stakeholders, including Breckland Council, in March 2026 explaining the Gate process and position in respect of this project. The document states that in the past, “it was a “first come, first served” system, with no restriction on the volume of applications that could be made for new connections. That created a huge backlog, with hundreds of projects holding grid slots even if they were not ready to be built.” and that “Now, projects are being prioritised based on being ‘ready’ and ‘strategically aligned’ with government’s criteria at regular ‘Gate Windows’. The Window gives NESO an opportunity to assess all connections collectively in order to inform a more efficient network design. Where they are deemed ready and ‘strategically aligned’ at any Gate Window, projects will be given a ‘Notification’ that they will be ‘Gate 2’. All other projects will be Gate 1.” The Applicant notes that whilst “NESO are yet to confirm when the next Gate Window is...this will be the next opportunity for projects at Gate 1 to move to Gate 2.” In regard to projects in Gate 1, these will “not be given a confirmed grid connection date or location in the offers released later this year. This does not mean their connection has been cancelled. It means they are not being prioritised in this first Gate Windows round and will be looked at again in future rounds.” In terms of what this means for the Scheme, the Applicant can aim to secure a connection in a future round but that this does not preclude the Scheme from progressing through to a decision given the Applicant's expectation is that NGET will determine that the proposed location for the National Grid Substation is suitable (given the Applicant's site selection methodology being akin to NGET's site selection process).



Reference number	Representation	Applicant response
		However, the Applicant retains the ability to separately seek consent for the grid connection from the Customer Substation to the National Grid Substation in the unlikely event that NGET subsequently decides that they would prefer to site the National Grid Substation elsewhere. To confirm, the Applicant has secured the requisite land rights and therefore complied with its contractual obligations to “obtain land and consent” for the National Grid Substation under the terms of the grid connection offer. The Applicant wishes to add that it is an established principle that an applicant is not required to deliver a connection to a generating station as part of a DCO application for that generating station, provided that a connection agreement is in place. In other words, it is not a barrier to granting consent for a generating station if the point of connection is not yet identified or consented.
BC60	The Council considers that the lack of a Grid 2 offer casts doubts over the content of the application/specifics of the scheme layout and what has been assessed within the Environmental Statement/accompanying submission documents. As set out within the previous statutory consultation response, the position of key infrastructure is a key concern for the Council, and any change to the grid connection would likely result in knock on impacts, for example on the impact upon heritage assets or surrounding landscape, and this may alter the Council's stance to the development as a whole.	Having a Gate 1 connection offer means there is not yet a confirmed grid connection location or date to connect for the Scheme. However, project development will continue and The Applicant can apply again to move into Gate 2 in future rounds. The Government is clear that the Clean Power 2030 Action Plan and Connections Reform is not about stopping projects, but is about prioritising projects for 2030, while maintaining a robust pipeline beyond 2030. Projects which continue to demonstrate they are ‘ready’ are expected to be re-prioritised, especially as the government continues to refine its criteria for ‘strategic alignment’. It is also anticipated that some projects currently in the queue may drop out. The Applicant will keep developing the Scheme with the aim of securing a Gate 2 connection in a future round, and the Applicant will keep local representatives and communities updated as matters progress. That the Scheme includes as associated development the proposed grid substation for the scheme reduces uncertainty around the deliverability of that connection, if the Scheme is to be consented. The impacts of the Scheme on heritage assets and the surrounding landscape have been assessed on a worst-case basis in ES Chapter 6: Landscape and Visual [AS-016] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The location of the National Grid Substation, Customer Substation, and BESS has been selected to reduce the impacts on heritage and landscape, through the processes of environmental testing and consultation that have been undertaken in preparing the DCO Application, as summarised in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053].
BC61	Whilst it is understood that the applicant plans to reapply in a future application window for a Gate 2 offer, this process is unlikely to be completed within the timescales for the Examination for the Drove Solar Farm. Furthermore, should the applicant seek to resolve any related future issues via the submission of a planning application for grid connection changes under the Town and Country Planning Act 1990 (as amended), it is considered that such an approach would place an undue burden on the Council as the Local Planning Authority in terms of assessing any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement assessed during examination of the DCO.	The Applicant has largely responded to Breckland Council's concerns in the Applicant's Response to section 89(3) letter dated 17 March 2026 [AS-063]. The Applicant does acknowledge the Council's concerns regarding resources in the unlikely event that a Town and Country Planning Act (TCPA) 1990 application was necessary, and would like to offer reassurance to the Council that the Applicant will communicate with the Council at all stages of the process if a TCPA application looks like it may be required.
BC62	Accordingly, the Council has commented on the application as submitted, however, wishes to raise significant concerns in this regard and considers additional consultation should take place to allow the Council and other stakeholders the right to provide additional representations should developments in this regard impact upon the specifics of the scheme as submitted.	The Applicant considers that it has complied with all relevant consultation requirements, including the applicable provisions of the PA2008, as set out in the Consultation Report [APP-025]. The Applicant is satisfied that its consultation approach to date has been robust and that stakeholders have been provided with appropriate opportunities to comment on the Scheme. The Applicant notes that the examination process provides a further opportunity for interested parties to make representations and participate in the consideration of the DCO Application.



Reference number	Representation	Applicant response
		The Applicant will continue to comply with relevant legislation and guidance in relation to any further consultation requirements, where applicable. However, at this stage, because the Scheme includes the proposed grid connection as associated development, the Applicant does not currently consider that a planning application for grid connection changes under the Town and Country Planning Act 1990 would be required. Therefore, the Applicant does not currently consider there to be any significant risk of undue burden being placed on the Council in this regard.
BC63	Secondary Issues for Examination Glint and Glare Whilst the majority of the queries raised during the previous statutory consultation have been satisfactorily addressed, the Council's Environmental Health Officer considers that the comments below require further consideration: "Where solar reflections are geometrically possible, the impact classification on dwelling receptors with a fixed south facing panels scenario shows that no and low impacts are present for dwelling receptors 1-3, 10, 20 and 43-44. Except for receptor 20, the classification of the impact and whether mitigation is recommended appears to be ultimately based on a desk-based review of existing screening. Where solar reflections are geometrically possible, the impact classification on dwelling receptors with single axis tracking panels scenario shows that no and low impact are present for receptors 10, 11, 15-19, 21-33, 43-44, 12-14, 34-42 and 20. As for the other scenario, other than for receptor 20, the classification of the impact and whether mitigation is recommended appears to be ultimately based on a desk-based review of existing screening. This includes receptor 10 which has been assigned 'no impact' and 'no mitigation', despite solar reflections being geometrically possible for more than 3 months per year and more than 60 minutes on any given day. As for other dwelling receptors, screening by existing vegetation was used to determine whether the views of the reflecting panels would be significantly obstructed and no mitigation was recommended for the two scenarios considered. The officer considers that it would be useful to understand if the author has undertaken a site walkover to validate the findings of the desk-study, (if no site walkover, why not?), in particular in relation to vegetation and terrain. For instance, are the trees and hedges seen on satellite imagery still present to provide screening and are these able to provide year round screening? Are there any breaks/gaps in hedges which need to be addressed to provide sufficient screening? It is considered that these questions need to be assessed and answered as part of the DCO submission."	The author of the ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176] has not conducted a site walkover, but Site photography produced by the Applicant was reviewed in conjunction with aerial imagery to confirm visibility. This is consistent with the approach taken for other solar DCOs and is equally effective in determining the extent of existing screening. The geometric model used for glint and glare considers only bare-earth terrain and existing and proposed screening is considered after the geometric calculation. It is therefore possible for the model to predict high durations of glare, but for this to be impossible in practice due to screening. For views of the panels to be 'significantly obstructed' it is not necessary for the panels to be completely obscured, but rather it should be the case that there is no possibility for sustained and unobstructed glare to reach the receptor.
BC64	The applicant has confirmed that a site survey has not been undertaken in the preparation of the Glint and Glare Assessment. The Council considers that a site survey is necessary to ensure that the reported findings are sufficiently robust to withstand the scrutiny of examination.	The author of the ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176] has not conducted a site walkover, but Site photography produced by the applicant was reviewed in conjunction with aerial imagery to confirm visibility. This is consistent with the approach taken for other solar DCOs and is equally effective in determining the extent of existing screening.
BC65	Breckland Council also highlighted the following during the previous statutory consultation: "High Groves Solar – The consultation documents assess that cumulative impacts are possible towards one dwelling receptor, which is predicted to experience residual impacts from the proposed development for both panel configurations and have visibility of High Groves Solar. It is noted that the potential for cumulative impacts will be considered by the Applicant as further details are known regarding	A cumulative assessment of glint and glare impacts is included in Section 7 of the ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176]. This assessment makes worst-case assumptions including that the technology would be the same for aviation impacts and that glare would be possible from High Groves Solar towards all receptors in the cumulative assessment area. Even with these assumptions, no significant cumulative impacts are predicted and no further mitigation is recommended.



Reference number	Representation	Applicant response
	the High Grove Solar project, the Applicant noting that additional mitigation may be required to reduce the level of impact. The officer notes that the Scoping Report for High Grove Solar states that solar panels may be either fixed south facing or east-west single-axis tracking. The Drovers consultation report indicates that the worst-case scenario for cumulative impacts would be if the two solar farms shared the same panel technology and angles. The officer therefore considers that a further report will be required once sufficient details are known for both solar farms.” It is not considered that the above concern has been addressed by the applicant within the DCO submission. As such, it is considered the issue must be addressed during examination.	
BC66	Furthermore, Breckland Council raised the following during the previous statutory consultation: As part of the operational management plan, the officer recommends that a process for receiving, managing and responding to complaints is prepared. This should include clear details of how the public can make contact, how complaints will be managed, liaison with Breckland’s Environmental Protection Team and Planning Enforcement Team, and a compliance monitoring scheme as a result of complaint. The complaint process should be reviewed annually and revised as appropriate.	The Applicant has taken note of this and will consider adopting this with in the oCEMP [APP/7.6.1] accordingly.
BC67	It is noted that the applicant does not consider a complaints procedure to be necessary, however, the Council disagrees in this regard and requests such a procedure is secured via the DCO in the event consent is granted.	The oOEMP [APP/7.8.1] sets out that in respect of Air Quality, the Site Management will ‘<i>Record all dust and air quality complaints</i>’ and ‘<i>make the complaints log available to the local authority</i>’. The cause of the complaints will be identified, and appropriate measures will be taken to address this. The oOEMP [APP/7.8.1] states that as a monitoring requirement, in respect to noise and vibration. ‘<i>The complaints procedure will be managed in consultation with Breckland Council which will be reviewed annually</i>’ and that ‘<i>Further details are to be confirmed in the detailed OEMP</i>’. Finally, the document states that through an appointed Environment Manager ‘<i>Corrective actions [will be] taken in response to incidents, breaches of the approved detailed OEMP or complaints received from a third party.</i>’
BC68	Breckland Council defers to the advice of the relevant organisations such as the Civil Aviation Authority, NCC Highways who should be approached in relation to the potential impact of glint and glare on the receptors not considered by Environment Protection (aviation, roads etc) as they will have specific requirements which need to be met. The Council understands that RAF Marham is liaising with the applicant regarding solar reflections and the ATC tower.	The Applicant notes this comment and is engaging with the relevant consultees to address glint and glare impacts towards aviation and road receptors.
BC69	Noise Whilst the majority of the queries raised during the previous statutory consultation have been satisfactorily addressed, the Council’s Environmental Health Officer has reviewed the submission and commented as follows: Construction and Decommissioning The EHO has reviewed the outline Construction and Environmental Management plan (oCEMP) and understands that worst case scenarios have been utilised in predicting noise levels. Works likely to give rise to noise are proposed to be restricted between 07:00 – 18:00 on weekdays, and 08:00 – 13:30 on Saturdays. Night works and Sunday/bank holiday works are not anticipated unless connected with horizontal directional drilling (HDD) or emergency works. The EHO notes	The Applicant notes this comment. Mitigation measures, such as restricting piling hours, use of quieter piling techniques, and/or use of localised screening, have been outlined in ES Chapter 10: Noise and Vibration [APP-059] to reduce impacts at ‘Keepers Cottage’ during piling works, and embedded measures such as restricted hours and best practice measures to reduce effects at ‘The Splashes’ during road upgrade works to non-significant levels have been outlined in the oCEMP [APP/7.6.1]. These will also be included in the detailed Construction Environmental Management Plan which will be secured as a requirement of the DCO and requiring approval by Breckland Council.



Reference number	Representation	Applicant response
	"Keepers Cottage" will likely be subject to significant impact due to pile driving. "The Splashes" will be affected by noise from the construction of access tracks, although this will be of a more limited duration. Keepers Cottage, Finger Hill Cabin, Glebe Cottage and South Acre Hall are all likely to be affected by noise from HDD. It is noted that detailed CEMP/s are proposed to be secured by the DCO, requiring approval by Breckland Council, and including mitigation measures to minimise noise to the residential properties likely to be affected. This is supported by the Council.	
BC70	Operational Noise Upon review of ES Chapter 10 (Noise and Vibration) and the associated noise surveys, the EHO notes that a penalty of +2dB has been added to predicted noise levels as per BS4142. The EHO also notes that predicted noise levels have been based on a worst-case scenario with all equipment working at full duty with no screening due to equipment and structured on site.	The Applicant notes this comment.
BC71	The EHO understands that general noise limits of 35dBA will be achievable at most locations by ensuring there is adequate distance between residential properties and conversion units. It is noted that additional noise mitigation will be required for Keeper's Cottage, dependent on final equipment selection.	The Applicant notes this comment.
BC72	Cumulative Effects The EHO notes "The Off Barn" on Sporle Rd may be subject to cumulative noise effects resulting from both The Drovers Solar Farm and High Grove Solar Farm. It is predicted that under the worst-case scenario noise levels could reach 37dBA. Whilst the EHO acknowledges that this is a worst-case scenario, the worst case is likely to occur during weather conditions when residents are most likely to be enjoying outdoor areas and have windows and doors open. The applicant has indicated that they are in further consultation with High Grove Solar, however, it should be noted that High Grove Solar Farm has already committed to a lower noise level of 33dBA. As such, it is considered that the onus should be on Drove Solar to achieve 35dBA. It is considered vital that acceptable levels of noise effects are achieved as residents will not have the recourse of statutory nuisance provisions in the event that consent is granted.	The Applicant notes this comment. ES Chapter 10: Noise and Vibration [APP-059] shows predicted levels of 34dB(A) at 'The Off Barn' receptor with predicted levels from High Grove to be between 33-35dB(A). It is noted that High Grove state in their PEIR a commitment to reduce noise effects at 'The Off Barn' receptor by means of additional mitigation, including cumulative effects. It is stated in Paragraph 10.11.19 and 10.11.20 of ES Chapter 10: Noise and Vibration [APP-059] that the Applicant is committed to collaboration with High Grove in relation to exploring additional mitigation for both schemes to meet the cumulative limit at this receptor. This has been stated in the oOEMP [APP/7.8.1] and will be included in the detailed Operational Environmental Management Plan to be secured as a DCO requirement.
BC73	Operational Management Plan The EHO welcomes the applicant's commitment to post commissioning noise monitoring, and a noise monitoring and complaint procedure. It is noted and supported that full details will be submitted to the Council for approval as part of a detailed Operational Environmental Management Plan secured via a DCO Requirement in the event consent is granted.	The Applicant welcomes this comment.
BC74	Arboriculture The Council's Tree and Countryside Officer welcomes the submission of an Arboricultural Impact Assessment (AIA) and associated tree protection documentation following a request for such documentation as part of the Council's response to the previous statutory consultation.	The Applicant welcomes this comment.



Reference number	Representation	Applicant response
BC75	The submitted AIA is accepted in principle, and it is considered that the methodology appears consistent with the recommendations of 'BS 5837:2012 – Trees in Relation to Design, Demolition and Construction', and that the categorisation and root protection area (RPA) calculations are generally sound.	The Applicant welcomes this comment.
BC76	However, there is concern with the proposed Removal of T206 (Category A Tree). This is defined as a tree of high quality and value within the AIA with an estimated remaining life expectancy of at least 40 years.	T206 will be retained and provided with the minimum offsets as per the commitments in the Design Principles, Parameters and Commitments [APP/5.8.1] and oLEMP [APP/7.11.1] .
BC77	The removal of a Category A tree to facilitate the siting of solar array panels is not supported by the Council. Category A trees should be regarded as a significant constraint in the design process. Their removal should only be contemplated where there is a clear and overriding justification; and no feasible design alternative exists.	As stated above, this tree will be retained and provided with the minimum offsets as per the commitments in The Design Principles, Parameters and Commitments [APP/5.8.1] and oLEMP [APP/7.11.1] .
BC78	In this instance, the loss appears to be driven by panel layout efficiency rather than an unavoidable technical requirement. Given the scale of the wider site, there should be reasonable opportunity to amend the array layout to retain T206 in situ, with appropriate buffering beyond its RPA. It is therefore recommended that the layout be revised to secure the retention of T206.	As stated above, this tree will be retained and provided with the minimum offsets as per the commitments in The Design Principles, Parameters and Commitments [APP/5.8.1] and oLEMP [APP/7.11.1]. Embedded mitigation in the oCEMP [APP/7.6.1] states that tree removal will be avoided wherever practicable. Trees with a BS5837:2012 Quality Category of U shall be preferentially removed followed by Category C, B and A trees in that order of priority. The Design Principles, Parameters and Commitments [APP/5.8.1] and oLEMP [APP/7.11.1] set out the commitment that Solar PV Arrays will be offset from existing landscape features by the following (minimum) distances: • Hedgerows – 8m. • Hedgerows – with trees – 10m. • Individual trees and groups of trees – 10m. • Veteran and Ancient trees – 15x width of tree stem diameter As part of the Design Principles, Parameters and Commitments [APP/5.8.1], these commitments will be secured to inform the detailed design in relation to the DCO. Detailed design will be determined accordance with these commitments, including routing of new access tracks and panel layouts. An updated Illustrative Layout and AIA will be provided at Deadline 1 to illustrate retention of T206 and ensure alignment with the extent of vegetation removal committed to in the Vegetation Removal Plan, Appendix 2 of the oLEMP [APP/7.11.1].
BC79	Furthermore, the current alignment of access tracks and/or haul roads appears to encroach unnecessarily into the RPAs of the following tree groups: • G26 – Category A group • G9 – Category B group • G109 – Category B group • G118 – Category B group	The access track routing is not secured through the DCO Application and is shown indicatively on the illustrative layout for informative purposes only. The final access track alignment will be determined in accordance with the commitments set out in the Design Principles, Parameters and Commitments [APP/5.8.1] and oLEMP [APP/7.11.1], which state that internal access tracks will be offset from existing landscape features, with the exception of crossing points, by the following (minimum) distances: • Hedgerows – 8m.



Reference number	Representation	Applicant response
		• Hedgerows – with trees – 10m. • Individual trees and groups of trees – 10m. • Veteran and Ancient trees – 15x width of tree stem diameter Internal access tracks will follow the alignment of the existing agricultural tracks, where practicable, with the exception of the droves and PRowWs.
BC80	While Category B trees are of moderate quality, they nonetheless contribute meaningfully to landscape character, biodiversity value, and long-term canopy cover. G26, being Category A, carries high arboricultural and landscape significance.	The Applicant agrees with this comment.
BC81	It is considered that minor realignment of the proposed access tracks/haul routes would likely avoid or materially reduce RPA incursions without compromising the operational function of the scheme. Slight repositioning of haul routes to avoid incursion into G26's RPA is therefore recommended, along with adjustment of track alignment to reduce pressure on Groups 9, 109 and 118.	The Applicant has responded to this comment substantially in relation to BC79 above.
BC82	Where temporary access within RPAs is demonstrably unavoidable, the submission of a detailed arboricultural method statement (AMS) specifying ground protection, no-dig construction, and supervision requirements should be secured via a DCO Requirement in the event consent is granted	ES Appendix 16.4: Arboricultural Impact Assessment [APP-178] provides indicative details of tree protection measures to be adopted where necessary, which includes ground protection, no-dig construction and arboricultural supervision. The oLEMP [APP/7.11.1] provides a commitment that a detailed Arboricultural Method Statement, based on post-DCO detailed design, will be produced prior to construction commencing and will be included within the detailed Construction Environmental Management, secured as a requirement of the DCO.
BC83	It is noted that the Biodiversity Net Gain Report states that 37 veteran trees are present. This is not noted in the User Comments of the BNG Metric but should be for ease of reference. The BNG report suggests that the veteran trees have been identified by the AIA. It is worth noting that the way arboriculturists categorise veteran trees differs from the Environment Act, with the Environment Act having a lower threshold for veteran. The number of veterans on site should be confirmed by an Ecologist to ensure none have been missed.	The Applicant notes this comment and can confirm the number of veteran trees (along with their individual references) has been added into the user comments within the updated BNG metric for ease of reference during the current updates undertaken to reflect the publication of the LNRS submitted at Deadline 1. In relation to BNG, the presence of individual veteran trees has been confirmed by the Applicant in line with the definitions set out in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. Reference to the AIA is provided in order to allow comparison and cross-referencing of individual trees and to ensure consistency. Nonetheless, in light of the comments, further clarification and confirmation of this position has been included within the updated BNG Assessment submitted at Deadline 1.
BC84	The Council also welcomes the submission of a site-wide outline Landscape and Ecological Management Plan (oLEMP), having requested submission within the Council's previous statutory consultation response.	The Applicant welcomes this comment.
BC85	The Council is supportive of the proposed approach in the main, considering that the document provides a clear framework for how the site will be managed and enhanced in landscape and ecological terms. Furthermore, the general direction of travel; particularly around hedgerow strengthening, new native planting and longer-term habitat management, is welcomed.	The Applicant welcomes this comment.
BC86	As this is an outline document, it is accepted that some elements will need to be refined once works commence and site-specific conditions are fully understood. However, it is considered imperative that any changes identified on the ground; whether relating to soil conditions, drainage, existing vegetation, or updated ecological findings, are reflected within the final version of the LEMP to be approved	The Applicant agrees with this comment and will update the final version of the detailed Landscape and Ecological Management Plan accordingly, if required.



Reference number	Representation	Applicant response
	under the relevant DCO Requirement in the event consent is granted. An adaptive approach to management is considered appropriate here, simply being good practice and ensuring that what is delivered on site is realistic and workable rather than overly fixed at this stage.	
BC87	Hedgerow Works and Gap Creation The proposed enhancement of retained hedgerows is supported. Where gaps are to be created or widened to facilitate access or operational requirements, there should be a clear expectation that works are undertaken carefully and that disturbance is kept to the minimum necessary. Hedgerows within this landscape perform an important ecological and structural function, and unnecessary removal should be avoided. In this regard, it is considered that works should: • Be limited to what is strictly required; • Avoid the bird nesting season unless supervised and confirmed clear; • Retain existing root systems where possible; and • Be accompanied by appropriate replanting using suitable native species. The overall objective should be to maintain continuity and habitat function across the site.	The Applicant notes this comment and confirms that hedgerow works, including any gap creation or widening, will be undertaken with due care, with measures secured through the Design Principles, Parameters and Commitments [APP/5.8.1], the oCEMP [APP/7.6.1] and the oLEMP [APP/7.11.1]. The specific points raised are addressed below. Works should: <u>Be limited to what is strictly required</u> Hedgerow removal and the creation or widening of gaps will be limited to that which is strictly necessary to facilitate access tracks, fencing and cable routes. Where practicable, existing gaps within hedgerows will be utilised to minimise the need for removal, as secured through the Design Principles, Parameters and Commitments [APP/5.8.1]. <u>Avoid the bird nesting season unless supervised and confirmed clear</u> The oCEMP [APP/7.6.1] includes standard mitigation measures to protect nesting birds. Vegetation clearance will be undertaken outside of the bird nesting season (March to August inclusive), or where this is not practicable, will be preceded by an inspection by a suitably qualified ecologist, with appropriate mitigation implemented where required. <u>Retain existing root systems where possible</u> The Design Principles, Parameters and Commitments [APP/5.8.1] and oLEMP [APP/7.11.1] set out the commitment to provide a minimum buffer of 8m to hedgerows with the exception of crossing points. This is sufficient to retain and protect existing root systems where possible. <u>Be accompanied by appropriate replanting using suitable native species</u> Where hedgerow removal is required, reinstatement and enhancement planting will be secured through the oLEMP [APP/7.11.1] and detailed within the detailed Landscape and Ecological Management Plan, secured as a requirement of the DCO. This will include the use of suitable native species appropriate to the local landscape character, ensuring continuity of habitat function across the Site.
BC88	Establishment and Watering The proposed establishment measures are welcomed. However, in light of increasingly dry summers and variable weather conditions, it is considered that the watering period for new tree and hedgerow planting should be extended.	The oLEMP [APP/7.11.1] states in paragraph 7.4.8 and paragraph 7.3.57 that “<i>all trees and shrubs will be regularly watered in the first summer and thereafter as required to ensure successful establishment</i>” in relation to proposed woodland belt and copse management and also proposed hedgerow tree management. This approach would also be taken for hedgerow planting. The oLEMP [APP/7.11.1] has been updated at Deadline 1 to commit to the watering of new planting for two growing seasons, with ongoing monitoring and replacement of failures during that period.
BC89	Rather than limiting watering to the first year post-planting, this should be increased to two growing seasons, with ongoing monitoring and replacement of failures during that period. It is considered that extending the establishment phase in this way will significantly improve survival rates and help ensure that the intended landscape and biodiversity benefits are successfully delivered.	The Applicant notes this comment. The oLEMP [APP/7.11.1] states in paragraph 7.4.8 and paragraph 7.3.57 that “<i>all trees and shrubs will be regularly watered in the first summer and thereafter as required to ensure successful establishment</i>” in relation to proposed woodland belt and copse management and also proposed hedgerow tree management. This approach would also be taken for hedgerow planting. The oLEMP [APP/7.11.1] has been updated at Deadline 1 to commit to the watering of new planting for two growing seasons, with ongoing monitoring and replacement of failures during that period.



Reference number	Representation	Applicant response
BC90	Subject to the above recommendations being incorporated, it is considered that the oLEMP provides a suitable framework for long-term landscape and ecological management of the site.	The Applicant welcomes this comment.
BC91	Lighting In addition to the arboricultural matters previously raised, the Council's Tree and Countryside Officer considers that it is necessary to address the potential ecological impacts associated with artificial lighting within the proposed development.	The Design Principles, Parameters and Commitments [APP/5.8.1] confirm that " <i>The Solar arrays will not be lit during the operational phase</i> ", such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects (including secured by Requirement 13 of the draft DCO [APP/3.1.1]) are set out within the oCEMP [APP/7.6.1] .
BC92	Need for a Sensitive Lighting Strategy Although solar farms are typically low in operational lighting, construction lighting, security lighting, inverter stations, substations and CCTV columns can introduce artificial illumination into otherwise rural and dark landscapes.	The Applicant notes this comment. The Design Principles, Parameters and Commitments [APP/5.8.1] confirms that " <i>The Solar arrays will not be lit during the operational phase</i> ", such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects (including secured by Requirement 13 of the draft DCO [APP/3.1.1]) are set out within the oCEMP [APP/7.6.1] .
BC93	The site lies within a predominantly agricultural and semi-natural landscape where baseline light levels are low. The introduction of inappropriate or excessive lighting could adversely affect: • nocturnal and crepuscular species (including bats); • Foraging and commuting corridors along hedgerows, tree belts and ditch networks; • Ground-nesting birds and farmland species; • Invertebrate populations; • General habitat connectivity across the site.	The Applicant notes this comment. The Design Principles, Parameters and Commitments [APP/5.8.1] confirms that " <i>The Solar arrays will not be lit during the operational phase</i> ", such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects (including secured by Requirement 13 of the draft DCO [APP/3.1.1]) are set out within the oCEMP [APP/7.6.1] .
BC94	Artificial light is recognised as a form of habitat fragmentation and disturbance and must be treated as an ecological constraint within the scheme design. Any lighting strategy should accord with: • The Bat Conservation Trust / Institute of Lighting Professionals Guidance Note 08/23 – Bats and Artificial Lighting at Night; • The Institution of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light; and • The mitigation hierarchy (avoid – mitigate – compensate).	The Applicant notes this comment. The Design Principles, Parameters and Commitments [APP/5.8.1] confirms that " <i>The Solar arrays will not be lit during the operational phase</i> ", such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects (including secured by Requirement 13 of the draft DCO [APP/3.1.1]) are set out within the oCEMP [APP/7.6.1] .
BC95	Whilst measures to control construction lighting are set out in the oCEMP and operational lighting is set out within the oOEMP to be generally restricted to the Customer Substation, the National Grid Substation, and within the BESS, "to maintain safe working conditions in winter months, for security purposes, and for maintenance activities", it is considered that a DCO Requirement should be imposed in the event consent is granted to secure submission and approval of a detailed Sensitive Lighting Strategy, to include: a) Justification of Need:	The Design Principles, Parameters and Commitments [APP/5.8.1] confirms that " <i>The Solar arrays will not be lit during the operational phase</i> ", such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects (including secured by Requirement 13 of the draft DCO [APP/3.1.1]) are set out within the oCEMP [APP/7.6.1] . Further, the key features identified to support bat commuting and foraging within the site are the hedgerows and woodland edges. The Customer Substation, National Grid Substation, and BESS will be located internally within fields and will not affect boundary features, including no significant light spill onto boundary features,



Reference number	Representation	Applicant response
	- Demonstration that lighting is only provided where strictly necessary for health, safety or operational security; and - Confirmation that lighting is not continuous across the site as standard practice. b) Dark Corridors: - Retention of unlit buffer zones along all retained hedgerows, tree belts, watercourses and field margins; and - Particular care to maintain dark commuting corridors associated with G26 and other retained tree groups. c) Luminaire Specification - Fully shielded, directional fittings; - Warm white spectrum (preferably $\leq 2700\text{K}$); - No upward light spill; - Low mounting heights; and - PIR or motion-sensor activation rather than constant illumination. d) Lux Level Control - Lighting contour plans demonstrating minimal spill beyond operational areas; and - Lux levels at hedgerow and tree canopy edges reduced to near baseline (≤ 0.5 lux where bats are present, subject to ecological advice). e) Construction Phase Controls - Temporary construction lighting to be directional, time-limited and positioned away from sensitive habitats. In summary, given the rural character of the site and the presence of established tree belts, hedgerows and associated habitats, it is essential that the scheme safeguards the site's existing dark landscape character. A DCO Requirement securing the submission and approval of a Sensitive Lighting Strategy prior to installation is therefore recommended. It is considered that such an approach would ensure the development proceeds in a manner consistent with ecological best practice and minimises impacts upon local wildlife and habitat connectivity.	and as such features of importance for bats will remain unaffected and connectivity maintained within the landscape.
BC96	Private water supplies It is noted that ground water monitoring will be taking place at several sites surrounding the development. It is also noted that "Keepers Cottage" benefits from a Private Water supply (PWS). Whilst in theory the Council's EHO is of the view that the depth of piling should not give rise to any pollution issues, certain weather conditions, for example heavy rain after a prolonged dry spell can allow pollutants to penetrate the aquifer more readily. Rainwater can be acidic and therefore aggressive to metal and fittings, potentially giving rise to chemical contaminants. The Council's EHO has not identified any record of Breckland Council risk assessing or testing this supply and so the Council cannot vouch for the integrity of	ES Chapter 12: Water Resources [APP-061] assessed the potential effects from the Scheme on the Keepers Cottage supply as negligible, based on the potential composition of the PV Mounting and the types of metals used in Work Nos. 2 to 4. Regardless, the oCEMP [APP/7.6.1] has been updated at Deadline 1 to include monitoring at the supply to provide an added level of protection.



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	the bore or headworks. As such, it is considered that “Keepers Cottage” should be included within the testing regime, during both pre and post construction, and provisions made for mitigation should any issues arise.	
BC97	Draft DCO Requirements In relation to the discharge of the DCO requirement (7) for the Landscape and ecological management plan the draft refers to “consultation with the relevant statutory nature conservation body”. The Council considers that Natural England should be specifically referenced in this instance.	The Applicant considers that the wider-ranging drafting of “the relevant statutory nature conservation body” is more appropriate to ensure appropriate consultation, rather than specifically referring to Natural England. This is to address the potential scenario of Natural England ceasing to exist or having its functions devolved.
BC98	In relation to the discharge of the DCO requirement (8) for the Operational traffic management plan the draft refers only to submission and approval by the local planning authority. The Council considers that consultation with Norfolk County Council Local Highway Authority and National Highways should be specifically referenced in this instance.	The Applicant will update Requirement 8 of Schedule 2 of the draft DCO [APP/3.1.1] to ensure that before approving the operational traffic management plan, the relevant planning authority must consult with the relevant highway authority.
BC99	In relation to the discharge of the DCO requirement (9) for the Biodiversity net gain strategy the draft refers to “consultation with the relevant statutory nature conservation body”. The Council considers that Natural England should be specifically referenced in this instance.	The Applicant considers that the wider-ranging drafting of “the relevant statutory nature conservation body” is more appropriate to ensure appropriate consultation, rather than specifically referring to Natural England. This is to address the potential scenario of Natural England ceasing to exist or having its functions devolved.
BC100	In relation to the discharge of the DCO requirement (11) for the Surface and foul water drainage the draft refers to “the Environment Agency and Anglian Water Services Limited or its successor in function as the relevant water undertaker”. The Council considers that Norfolk County Council in its role as the Lead Local Flood Authority should also be specifically referenced in this instance.	The Applicant notes that Requirement 11 of Schedule 2 of the draft DCO [APP/3.1.1] requires the Applicant to submit “ <i>to the relevant planning authority</i> ” (i.e. Breckland Council and/or Norfolk County Council) the written details of the surface water drainage scheme and (if any) foul water drainage system. As part of this approval, the Councils must consult with the Environment Agency and Anglian Water Services Limited or its successor in function as the relevant water undertaker. However, the Councils are also entitled to consult with any other organisation if they deem it necessary to do so, which can include Norfolk County Council in its role as the Lead Local Flood Authority (particularly given that is a branch of the same organisation providing the approval, i.e. one of the Councils). It is therefore unnecessary for the potential for this consultation to be spelt out on the face of the draft DCO [APP/3.1.1] . The Applicant has, therefore, not amended the wording of Requirement 11 of Schedule 2 of the draft DCO [APP/3.1.1] in this regard.
BC101	In relation to the discharge of the DCO requirement (12) for the programme of archaeological investigation the draft refers to submission to and approval by the relevant planning authority. The Council considers that consultation with Norfolk County Council Historic Environment Service should be specifically referenced in this instance.	The Applicant notes that Requirement 12 of Schedule 2 of the draft DCO [APP/3.1.1] requires the Applicant to submit “ <i>to the relevant planning authority</i> ” (i.e. Breckland Council and/or Norfolk County Council) a written scheme of investigation. As part of this approval, the Councils are entitled to consult with any other organisation if they deem it necessary to do so, which can include the Norfolk County Council Historic Environment Service (particularly given that is a branch of the same organisation providing the approval, i.e. one of the Councils). It is therefore unnecessary for the potential for this consultation to be spelt out on the face of the draft DCO [APP/3.1.1] . The Applicant has, therefore, not amended the wording of Requirement 12 of Schedule 2 of the draft DCO [APP/3.1.1] in this regard.
BC102	In relation to the discharge of the DCO requirement (15) for the Construction traffic management plan the draft refers only to consultation with the relevant highway authority. The Council considers that consultation with Norfolk County Council Local Highway Authority and National Highways should be specifically referenced in this instance.	The Applicant considers that the wider-ranging drafting of “the relevant highway authority” is more appropriate to ensure appropriate consultation, rather than specifically referring to Norfolk County Council Local Highway Authority and National Highways. The Applicant also notes that Councils are, under this Requirement, entitled to consult with any other organisation if they deem it necessary to do so.
BC103	In relation to the discharge of the DCO requirement (16) for the Public rights of way and permissive paths management plan the draft refers only to submission and approval by the local planning authority. The Council considers that consultation	The Applicant notes that Requirement 16 of Schedule 2 of the draft DCO [APP/3.1.1] already requires, at sub-paragraph (3), the relevant planning authority to consult with the relevant highway authority before approval of the public right of way and permissive path management plan. The Applicant considers that the wider-ranging drafting of “the relevant highway authority” is more appropriate to ensure appropriate



Reference number	Representation	Applicant response
	with Norfolk County Council Local Highway Authority should be specifically referenced in this instance.	consultation, rather than specifically referring to Norfolk County Council Local Highway Authority. The Applicant also notes that Councils are, under this Requirement, entitled to consult with any other organisation if they deem it necessary to do so.
BC104	In relation to the discharge of the DCO requirement (17) for the Soil management plan the draft refers to submission to and approval by the relevant planning authority. The Council considers that consultation with Natural England should be specifically referenced in this instance.	The Applicant notes that Natural England has not requested to be named as a consultee for approval of the soil management plan under Requirement 17 of Schedule 2 of the draft DCO [APP/3.1.1] . The Applicant is in discussions with Natural England regarding the contents of the oSMP [APP/7.13.1] and is confident of reaching an agreed position during the course of the examination. The Applicant also notes that the request proposed by the Council is notprecedented across the majority of made solar DCOs and, therefore, the Applicant does not intend to update the draft DCO [APP/3.1.1] in this regard. The Applicant also notes that Councils are, under this Requirement, entitled to consult with any other organisation if they deem it necessary to do so.
BC105	Batteries The Council notes that updated guidance was released by the National Fire Chiefs Council following submission of the application. It is assumed that the proposal will align with the principles within this updated guidance.	NFCC Planning Guidance 2026 is acknowledged; the Site has been cross-referenced against this and remains aligned.
BC106	This report constitutes Breckland Council's formal Relevant Representations response on the Development Consent Order (DCO) application (Ref: EN0110013) for The Drovers Solar Farm. The Council holds significant unresolved concerns regarding the impacts of this Scheme on the district, as outlined below. These concerns derive from the Council's statutory consultation response (attached for reference) and the applicant's Consultation Report responses (Section 42) which have been fully reviewed.	The Applicant notes this comment and has responded to the specific points made in turn.
BC107	These Relevant Representations identify principal issues requiring detailed examination and areas of incomplete information. The issues highlighted will be expanded upon by the Council through its Local Impact Report (LIR), Written Representations and Statement of Common Ground.	The Applicant notes this comment and welcomes continued engagement with Breckland Council.
BC108	Whilst the Council wishes to defer to the advice of Natural England on biodiversity matters, it wishes to highlight the proposed Biodiversity Net Gain figure of 10% is significantly lower than the 50% proposed as part of Statutory Consultation for Highgrove Solar Farm. As such, it is considered that more could and should be done in this regard.	Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1] , using the Government metric and associated guidance. This demonstrates that the Scheme will deliver a BNG substantially 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. Whilst no statutory requirement is currently in place in relation to DCO schemes, the identified BNG is therefore substantially in excess of the figure of 10% currently required for new developments under the Town and Country Planning Act 1990 and similarly anticipated for NSIPs under the emerging consultation information published by DEFRA.
BC109	Furthermore, NPS EN-1 paragraph 4.6.6 provides that "Energy NSIP proposals... should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity and the wider environment where possible". Applicants are encouraged to calculate the biodiversity net gain outcomes in line with the latest version of the biodiversity metric and present the calculation data in full as part of their application (NPS EN-1 paragraph 4.6.7).	The Applicant notes this comment. The calculations provided within the Biodiversity Net Gain Assessment Report [APP/7.4.1] are based on the latest version of the metric currently available. Whilst in line with the submitted information, the BNG Assessment has been updated in order to reflect the publication of the Norfolk LNRS at Deadline 1.
BC110	The Metric and the condition assessment have not been made available in Excel format. The Metric User is noted to be a company rather than an individual. It is considered that the Metric should be updated to reflect the October 2025 publication	The Biodiversity Net Gain Assessment Report [APP/7.4.1] was undertaken within the government's metric template, which is published in Excel format. However, the Examination Library created by PINS to receive submission documents is unable to accept Excel spreadsheet documents and therefore it was not possible to



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	of Local Nature Recovery Strategy, as noted in the BNG report. This will affect all trees recorded in the baseline and the other neutral grassland being created post-development.	provide the Excel format document as part of the submission. The Applicant would therefore be happy to provide this separately. As noted, the Norfolk LNRS was published in October 2025 following the initial assessment and accordingly, as noted within the submitted Biodiversity Net Gain Assessment Report [APP/7.4.1], the assessment has been updated at Deadline 1 in order to reflect the publication.
BC111	This relevant representation is based on the documentation submitted by the applicant to date. The Council will continue to assist the ExA through submission of an LIR, participation in hearings where appropriate and responding to ExA's Questions throughout the examination. The Council also reserves the right to make further comments at later stages of this process should new details emerge e.g. regarding the grid connection issues referenced above.	The Applicant notes this comment and welcomes continued engagement with Breckland Council.



2.3 RR-010, Borough Council of Kings Lynn and West Norfolk

Reference number	Representation	Applicant response
BCKLWN1	In general, renewable and low-carbon energy generation schemes and their benefits are supported by the Borough Council, subject to the impacts of the schemes being suitably minimised.	The Applicant welcomes this comment.
BCKLWN2	In terms of the submission documents, draft Order limits are defined within an updated concept masterplan (Jan 2026). This shows the actual areas for solar photovoltaic (PV) panels, predicted to generate over 50MW of electricity. Prior to the connection into the grid, which is understood to go live by end of 2033, it will require two substations to be constructed. The Battery Energy Storage System (BESS) and substations are shown positioned in the NE section of the site, separated from South Acre, which lies just south of Castle Acre in KLWN, by an area set aside for ecology mitigation.	The Applicant agrees with this comment.
BCKLWN3	The Applicant is seeking a time limited consent, with the scheme proposed to be operational for up to 60 years, after which time it would be decommissioned. The National Grid Substation and Grid Connection Infrastructure would remain.	The Applicant agrees with this comment.
BCKLWN4	The Applicant has been in contact with the Borough Council since pre-submission stages, and numerous changes have been made to the scheme as a result of these earlier discussions. Those changes include the movement of the BESS and substations to parcels south of Bartholomew's Hill Plantation with additional mitigatory land to the north of Bartholomew's Hill Plantation following landscape/heritage concerns being raised. This has minimised some harm from the scheme as a whole.	The Applicant agrees with this comment.
BCKLWN5	Notwithstanding the above, there are various issues raised by the submission that the Borough Council consider are of the greatest concern at this point. Impacts on Heritage Assets, Landscape Setting The Borough Council agree with the Applicant that the wider arable landscape is a contributing factor to Castle Acre Castle's significance as a monument of national value and that the Castle's setting serves as part of the reasoning for the placement of the structure.	The Applicant notes this comment and responds to the specific points made by the Borough Council below.
BCKLWN6	However, the Borough Council disagree that the key views from the Castle are to the East and West. The River Nar is to the southeast and the view over the bailey, towards the river, affords clear views of the application site and Bartholomew's Plantation, this is primarily to do with the topography which dips down towards the river and back up the other side of the valley towards the site.	Both ES Chapter 8 Cultural Heritage and Archaeology [APP-057] and ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] are clear that the topographic location of the castle in relation to the river valley, which includes elements to the east and west along with elements to the south, contribute to the significance of the monument. However, the parts of the Site that are visible from the monument (e.g. Bartholomew's Plantation and the fields to its north) do not contain elements that are considered 'key' to the understanding and appreciation of the monument. As such, the Site is not considered to make the same level of contribution to the significance of the Castle as other elements of its setting.
BCKLWN7	Para 2.10.110 of EN-3 sets out that 'As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design, and prominence, may cause substantial harm to the significance of the asset.'	There is no anticipated substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] outlines that 'substantial harm' is afforded to any adverse effect that is of a major magnitude, whilst moderate, minor or negligible adverse effects represent effects that are of 'less than substantial harm' in nature.



Reference number	Representation	Applicant response
	The Applicant has worked with the planning and heritage teams at the Borough Council to propose a scheme that minimises the harm, as far as possible from this proposal. The removal of the substations from direct views from Castle Acre and their placement to the South of Bartholemew's Hill Plantation would not remove harm but, it would filter the views and minimise the visual impact. The removal of solar PV from the northern part of field 33 is heartening as due to the topography, the remaining solar PV in this area would be over the crest of the rise and should be minimally visible.	As detailed in the submitted visualisations (ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]) the National Grid Substation and the Customer Substation will be entirely screened by Bartholemew's Plantation in views from the north, thereby removing, rather than reducing, visual impact. As described in ES Chapter 8 Cultural Heritage and Archaeology [APP-057] new pylons will be visible, but not other elements of the National Grid Substation and the Customer Substation.
BCKLWN8	Recognition should also be given to the fact that the Skylark and Stone Curlew mitigation (parcels 35, 36, 37 and 38), while positive for biodiversity will have an impact upon the agricultural setting of the monument and the conservation area. These areas should therefore also be carefully considered.	As stated above and as detailed in ES Chapter 8 Cultural Heritage and Archaeology [APP-057] and Appendix 8.2: Stage 1 and 2 Setting Assessment [APP-152] the contribution of setting to the significance of the various heritage assets assessed is not directly reliant upon the agricultural use of differing land parcels (particularly as these parcels are under modern agricultural regimes). The use of these fields for Skylark or Stone Curlew mitigation is, therefore, not considered to have any potential to present harm to the significance of any heritage asset.
BCKLWN9	Care still needs to be taken in the lighting and boundary treatment of the infrastructure which still has the ability to be impactful in this landscape. While PIR lighting could be a solution, the flashing on and off of these lights as they are set off would also be impactful and potentially more harmful. (This would benefit from more discussion to align with EN-3 Paras 2.10.39 - 2.10.40)	The Applicant notes this comment. The Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation and within the BESS compound, which would only include motion sensing lighting and be used to maintain safe working conditions in winter months, security purposes, and maintenance activities as detailed within the oOEMP [APP/7.8.1] and ES Chapter 5: The Scheme [APP/6.1.2]. Given the nature of these activities, it is not anticipated that there will be continuous flashing on and off of these lights. Lighting is not required within the Solar PV Site during the operation phase of the Scheme, with the exception of when panels could be cleaned at night, which may require lighting. If undertaken, the level of lighting would be similar to lighting required for night-time agricultural activities carried out in the area. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task-specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. Temporary site lighting would be used during construction to enable safe working during construction in hours of darkness or where natural lighting is unable to reach (such as sheltered/confined areas). Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the construction compounds while construction is underway. Regarding operational lighting, the Scheme would not conflict with NPPF Para 198 (c) or the Dark Sky Policy in Castle Acre's Neighbourhood Plan (adopted 2022) - Policy NE.4 Dark Skies. The Scheme limits light spillage and eliminates all unnecessary forms of artificial outdoor lighting, as defined within the oOEMP [APP/7.8.1]. The oOEMP [APP/7.8.1] specifies that the lighting design will follow good practice measures to minimise light spill and will seek to limit any impacts on sensitive receptors through directional cowls. The Design Principles, Parameters and Commitments [APP/5.8.1] confirms that "<i>The Solar arrays will not be lit during the operational phase</i>", such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects (including secured by Requirement 13 of the draft DCO [APP/3.1.1]) are set out within the oCEMP [APP/7.6.1]. In terms of potential lighting impacts upon heritage assets no such impacts have been identified in ES Chapter 8 Cultural Heritage [APP-057] or ES Chapter 6: Landscape and Visual [AS-016]. This is due to lighting being confined to the substations, which will be screened from sensitive heritage assets by Bartholemew's Plantation, the lighting being motion sensing for security and maintenance purposes, the lighting commitments



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		in the outline OEMP [APP-188] to minimise light spill, and the preparation of detailed lighting design at the detailed design stage.
BCKLWN10	The design of the substation and its infrastructure needs to be considered so that the highest parts are screened as far as possible by the plantation and should not be on its edges. The proposed removal and setting back of the pylon line is supported in principle from a heritage/landscape perspective.	The Applicant notes this comment. ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme and ES Chapter 8: Cultural Heritage and Archaeology [APP-057] assesses and impacts upon heritage assets as a result of the Scheme. Mitigation measures embedded into the Scheme have sought to ensure that potential visibility of the proposed larger elements of the Scheme, such as the National Grid and Customer substations, are screened as much as possible through new tree, woodland and hedgerow planting. Such measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1].
BCKLWN11	Ultimately, the retention of Bartholomew's Hill Plantation and its protection throughout the 60 year period is vital given its position as the core screening element of the proposed substation infrastructure versus the historic landscape setting of Castle Acre.	The Applicant notes this comment.
BCKLWN12	Amenity, Noise and Disturbance - Document ref APP/6.2 ES Chapter 10: Noise and Vibration confirms that all noise sensitive receptors are within the Breckland Council administrative area (section 10.5.6).	The Applicant agrees with this comment.
BCKLWN13	Section 10.6.12 confirms that locations to the north of the Solar PV Site experienced a quieter environment during the daytime due to their increased distance from road traffic, specifically the A47. During quieter evening periods, levels measured at the fixed positions tended to decrease as activity levels decreased, and noise levels recorded were regularly below 30 dB LA90, 15min at night-time.	The Applicant agrees with this comment.
BCKLWN14	Section 10.7.4 advises that HGV deliveries will be limited to 07:00-18:00 hours Monday to Friday and 08:00-13:30 hours on Saturdays. Section 6.1.3 of APP/7.7 outline Construction Traffic Management Plan (oCTMP) states construction deliveries by HGVs are scheduled to arrive between 09:00 and 17:00 hours.	Paragraph 10.7.4 outlines core construction activity (which may include HGV movements) hours for weekdays as 07:00-18:00 and Saturdays as 08:00-13:30, however, paragraph 5.4.26 further confirms that where practicable, deliveries would be coordinated to avoid HGV movements during the traditional peak hours of 08:00-09:00 and 17:00-18:00. Therefore, the hours for HGV deliveries are as presented within the oCTMP [APP/7.7.1] , which confirms that on weekdays HGV deliveries will only take place between 09:00 and 17:00 – to minimise any HGV deliveries taking place during the AM and PM peak hours, as requested by both National Highways and Norfolk County Council. The restriction on weekday delivery hours would be secured through the oCTMP [APP/7.7.1] that is secured by way of a requirement in the DCO.
BCKLWN15	Whilst the site could be accessed via the A1065 from the north, the minimal level of traffic indicated as likely from this direction, plus the controlled site/delivery hours, would mitigate traffic noise impacts.	The Applicant makes note of this comment. The routing for HGVs as presented in the oCTMP [APP/7.7.1] will be secured by way of a requirement in the DCO to ensure that the traffic impacts remain appropriately mitigated. ES Chapter 10: Noise and Vibration [APP-059] concludes traffic noise effects to be not significant based on the HGV routes and delivery hours as detailed in the oCTMP [APP/7.7.1]. The routes and delivery hours will be detailed in the detailed Construction Traffic Management Plan and secured via a DCO requirement.
BCKLWN16	Noise modelling has been undertaken to ascertain construction-related predicted noise impacts at receptors (presented in Table 10.3.1 and Table 10.3.2 in APP/6.4 Appendix 10.3: Construction and Noise Modelling). As already mentioned, no receptors are within our district.	The Applicant agrees with this comment.



Reference number	Representation	Applicant response
BCKLWN17	The APP/6.4 Appendix 9.2: Traffic Assessment document identifies in section 4.2.14 that construction vehicles will only utilise agreed routes as per the oCTMP which will be secured by a requirement in the DCO. Three routes are shown on maps – these being the A47 to the south (Route A), the A1064 to the east (Route B) and South Acre Road (NE)/Low Road (NNE/N)/Narford Road (NW) in combination (Route C).	The routing for HGVs as presented in the oCTMP [APP/7.7.1] will be secured by way of a requirement in the DCO to ensure that the traffic impacts remain appropriately mitigated.
BCKLWN18	Section 4.1.6 of APP/7.7 of the CTMP states it is proposed that no construction vehicles will use Route C, the northernmost part of which is within the BCKLWN district. This route could be used by workers accessing the site, but it states in section 1.4.1 that one of the objectives of the oCTMP is to minimise impacts of construction traffic on the local community, with another being to ensure the safe movement of equipment, materials and workers.	The routing for HGVs as presented in the oCTMP [APP/7.7.1] will be secured by way of a requirement in the DCO to ensure that the traffic impacts remain appropriately mitigated. Following feedback from Norfolk County Council, Route C will be restricted for all vehicle access so all construction vehicles will access via the A1065. The oCTMP [APP/7.7.1] has been updated to capture this amendment.
BCKLWN19	The overall site includes a number of public recreational routes which can be accessed from or lead to the BCKLWN area, and thus be utilised by our residents; Rebellion Way Cycle Route, Castle Acre Circular Walk and the Peddars Way and Norfolk Coast Path National Trail. Banksman will be used to warn route users of the likely movement of plant and construction vehicles and to halt construction traffic, where internal haul routes etc cross these via gated access points, and allow users of these public routes to pass through. Construction related noise is likely to impact on these route users, but this will be momentary and of a very temporary nature whilst they pass through the area, and is therefore not something need be concerned about.	The mitigation measures for construction traffic have been presented in the oCTMP [APP/7.7.1] and will be secured by way of a requirement in the DCO to ensure that the traffic impacts remain appropriately mitigated.
BCKLWN20	Vibration Section 10.5.12 of the APP/6.2 ES Chapter 10: Noise and Vibration document advises that road traffic vibration has been scoped out of the EIA (Environmental Impact Assessment). Vibration impacts from the construction related activities, including piling, would not impact on BCKLWN residential dwellings due to the separation distances being greater than 1000m.	The Applicant agrees with this comment.
BCKLWN21	Dust Section 5.6.1 of APP/7.7 oCTMP advises there will be wheel washes at each access at the egress point. These will be secured by the oCTMP. 5.6.2 continues to advise that visual inspections will be carried out to check vehicles are not carrying debris onto the highway. Section 5.12.2 advises vehicles carrying materials off site will be sheeted/covered to prevent dust, and when there are dry conditions, areas near access points will be sprayed with water.	The mitigation measures for construction traffic as presented in the oCTMP [APP/7.7.1] will be secured by way of a requirement in the DCO to ensure that the traffic impacts remain appropriately mitigated.
BCKLWN22	Table 3-11, in section 3.12 Other Environmental Matters (OEM), within APP/7.8 outline Operational Environmental Management Plan (oOEMP), under the heading Dust Management, advises a Dust Management Plan (DMP) will be developed and implemented, to be approved by the relevant local authorities. Under the heading Trackout in the same table, it includes that a wheel washing system will be implemented (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable), that a wheel washing facility will be provided at each access, located at the egress point of each access road.	The mitigation measures for construction traffic as presented in the oCTMP [APP/7.7.1] and wider environmental effects in the oOEMP [APP/7.8.1] will be secured by way of requirements in the DCO to ensure that the traffic and wider environmental impacts remain appropriately mitigated.



Reference number	Representation	Applicant response
BCKLWN23	These above measures identify that there should therefore be minimal dust issues from trackout, thus the road network should suffer little dust which could blow to residential receptors. With the site likely to generate little dust from areas other than the internal haul roads or access roads, given the separation distance to receptors in this district, we have no concerns over dust amenity impacts.	The mitigation measures for construction traffic as presented in the oCTMP [APP/7.7.1] and wider environmental effects in the oOEMP [APP/7.8.1] will be secured by way of requirements in the DCO to ensure that the traffic and wider environmental impacts remain appropriately mitigated.
BCKLWN24	Lighting Document APP/7.6 outline Construction Environmental Management Plan (oCEMP) advises in 2.6 Control of Light, section 2.6.2 that between November and February construction lighting will be via mobile lighting towers sited to ensure light is directed into the area of works only. It also advises cowls and hoods etc will be used. This is mainly to protect ecological receptors. Residential receptors in the BCKLWN area would be around 1km away and therefore should be unaffected by construction-related lighting on site.	The Applicant agrees with this comment
BCKLWN25	Section 2.7.3 of APP/7.8 oOEMP advises motion sensor security lighting will be provided at the two substations and the BESS, and that light spill from internal lighting is anticipated to be minimal. Document APP/6.4 ES Appendix 6.8 Amenity and Recreation Assessment, within Annex B (which contains email correspondence with consultees), advises within the LDĀ Design letter (page 7 of 7) that the operational phase will be unlit except the two substations which will have manually operated or motion operated lighting, with the design seeking to limit impacts on receptors through directional cowls as secured through the oOEMP. Again, residential receptors in the BCKLWN district would be around 1km away and should be unaffected by operational site lighting.	The Applicant agrees with this comment.
BCKLWN26	Ecology Paragraph 5.4.18 of EN-1 requires an ES to clearly set out any effects on international, national and locally designated sites of ecological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.	Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] , including with specific reference to international, national and locally designated sites of ecological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats, which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects.
BCKLWN27	There are no significant areas of concern for the parts of the proposals which lie adjacent to the KLVBC boundary. Chapter 7 sets out that the proposed site boundary is some 0.5km south of the River Nar SSSI which straddles the boundary of our Borough and Breckland District Council's area. The Construction and Decommissioning Phase has the potential to lead to impacts on this chalk river habitat in particular, through run-off and other pollutants and via hydrological pathways.	A full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in Section 7.7 and 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] , which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects.
BCKLWN28	The key potential impact pathway identified is air quality on Breckland SPA and Norfolk Valley Fens SAC. Impacts alone and in combination are screened out of further assessment based on the provision of a routing strategy. None of these routes would result in additional traffic along roads within 200m of Breckland SPA.	The Applicant agrees with this comment.
BCKLWN29	NPS EN-1 paragraph 4.6.6 provides that "Energy NSIP proposals... should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity and the wider environment where possible". Applicants are encouraged to calculate the biodiversity net gain outcomes in line with the latest	Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1] , using the Government metric and associated guidance.



Reference number	Representation	Applicant response
	version of the biodiversity metric and present the calculation data in full as part of their application (NPS EN-1 paragraph 4.6.7).	As noted, the Norfolk LNRS was published in October 2025 following the initial assessment and accordingly, as noted within the submitted Biodiversity Net Gain Assessment Report [APP/7.4.1] , the assessment has been updated at Deadline 1 in order to reflect the publication.
BCKLWN30	The Metric and the condition assessment have not been made available in Excel format. The Metric User is noted to be a company rather than an individual.	The Biodiversity Net Gain Assessment Report [APP/7.4.1] was undertaken within the Government's metric template, which is published in Excel format. However, the Examination Library created by PINS to receive submission documents is unable to accept Excel spreadsheet documents and therefore whilst available, it was not possible to provide the Excel format document as part of the submission. The Applicant would therefore be happy to provide this separately.
BCKLWN31	The Metric should be updated to reflect the October 2025 publication of Local Nature Recovery Strategy – this is noted in the BNG report. This will affect all trees recorded in the baseline and the other neutral grassland being created post-development.	As noted, the Norfolk LNRS was published in October 2025 following the initial assessment and accordingly, as noted within the submitted Biodiversity Net Gain Assessment Report [APP/7.4.1] , the assessment has been updated at Deadline 1 in order to reflect the publication.
BCKLWN32	Protected Habitats The Preliminary Ecological Assessment (PEA) outlines habitats of Principal Importance -lowland deciduous woodland, tree lines and veteran trees, most of which will be retained and protected. Veteran trees are also an irreplaceable habitat under the Environment Act. A substantial number of veteran trees are present on site.	The Applicant notes this comment.
BCKLWN33	The Biodiversity Net Gain Report states that 37 veteran trees are present though this is not noted in the User Comments of the BNG Metric but should be for ease of reference. The BNG report suggests that the veteran trees have been identified by the Arboricultural report. It is worth noting that the way arboriculturists categorise veteran trees differs from the Environment Act, with the Environment Act having a lower threshold for veteran. The number of veterans on site should be ground truthed by an Ecologist to ensure none have been missed.	The Applicant notes this comment and can confirm the number of veteran trees (along with their individual references) has been added into the user comments within the updated BNG metric submitted at Deadline 1, updated to reflect the publication of the LNRS. In relation to BNG the presence of individual veteran trees has been confirmed by the Applicant in line with the definitions set out in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. Reference to the AIA is provided in order to allow comparison and cross-referencing of individual trees and to ensure consistency. Nonetheless, in light of the comments, further clarification and confirmation of this position has been included within the updated include monitoring at the supply to provide an added level of protection at Deadline 1.
BCKLWN34	Game cover crops that are under countryside stewardship schemes is also present on site as are two Schedule 9 species (of which it is offence to cause such species to grow in the wild) - Three-cornered Garlic is present at the base of hedgerow H22d, at the north west of field 9. - Variegated Yellow Archangel is recorded as frequent within the field margin associated with Hedgerow 34B in the south-west of the site. These species need to be carefully managed during construction.	Design Principles in relation to ongoing management measures are secured in the outline LEMP [APP-191] , whilst specific measures such as those in relation the Schedule 9 species would be anticipated within the detailed Landscape and Ecological Management Plan.
BCKLWN35	Ditches are present on site, but the majority are recorded as associated with trees or hedgerows and are therefore to be recorded as watercourses within the Statutory Metric.	None of the ditches within the Site were recorded to be of sufficient size, nor hold water for sufficient time to qualify under the definition of a watercourse ditch set out within standard Biodiversity Net Gain guidance (Defra (Feb 2024) The Statutory Biodiversity Metric – User Guide, updated July 2025). Accordingly, they have not been included within the BNG assessment (Biodiversity Net Gain Assessment Report [APP/7.4.1]) in line with the guidance.



Reference number	Representation	Applicant response
BCKLWN36	Protected Species - Bats Several Pipistrelle bats were recorded to emerge and re-enter barn B3 at the southern elevation. This building is stated to be offsite and unaffected by the development	The Applicant agrees with this comment.
BCKLWN37	There are several trees with features suitable for roosting bats. These have not been surveyed in detail so presumably they will be retained and protected with an appropriate buffer to avoid disturbance during construction. If this is not the case further survey of such trees may be required.	The Applicant notes this comment and is pleased to confirm (in line with the vegetation removal plan forming part of the oLEMP [APP/7.11.1]) that all of the trees identified to support such features (along with those falling into the 'FAR' category) will be retained and protected with appropriate buffers.
BCKLWN38	In regard to foraging or commuting bats, the results of the static detector survey are not well summarised within the PEA. The focus is on the greatest number of registrations only. There is no analysis of which detector locations are significant for any particular species.	Details of the bat activity survey work undertaken are set out within the ES Appendix 7.2: Baseline Ecological Survey Report [APP-148] , whilst potential impacts on bats are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] . This assessment considers baseline ecological conditions and evaluates likely significant effects from the construction, operation and decommissioning phases of the Scheme, including with reference to the individual species present and the key features, and concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, no significant effects are anticipated in regard to foraging and commuting bats.
BCKLWN39	SD1 recorded 6,252 common pipistrelle passes indicating that this may be a significant location for the species. SD10 recorded 286 barbastelle passes despite a low number of passes overall compared to other locations. A deeper analysis of this data is required to understand which areas are important to which species and if there is to be an impact.	Details of the bat activity survey work undertaken are set out within the ES Appendix 7.2: Baseline Ecological Survey Report [APP-148] , whilst potential impacts on bats are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] . Over the course of the surveys, commensurate numbers of Common Pipistrelle registrations were recorded across a number of the detector locations. Similarly, registrations were noted for Barbastelle across a number of the detectors, likely representing commuting activity by this species along the taller/denser vegetation.
BCKLWN40	There is further information in the Ecology and Biodiversity Chapter (Chapter 7) which states that important flights lines etc will be retained and protected but there is no information to what these important routes/features are, why they are important and to which species.	Potential impacts on bats are assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] , based in the survey information set out within the ES Appendix 7.2: Baseline Ecological Survey Report [APP-148] . Over the course of the surveys, commensurate numbers of Common Pipistrelle registrations were recorded across a number of the detector locations. Key flight lines are focused on existing hedgerows, including providing connection between woodland blocks in particular, which will be retained throughout.
BCKLWN41	Badgers Setts have been identified within the red line and could be impacted by works. A licence should be a requirement of any consent if any badger setts are impacted.	A licence is not currently needed in respect of Badger given the existing setts are fully retained and subject to appropriate buffers. Given Badger are dynamic animals and levels of Badger activity can rapidly change at a site, with new setts created at any time, an update survey has been recommended prior to works commencing, should new setts have been created at that time. Should any new setts be discovered within the development area prior to the commencement of works which cannot be retained, then a licence application would be required and would be made at the appropriate time by the Applicant.
BCKLWN42	Contaminated Land Para 5.11.5 of EN-1 sets out that 'Where pre-existing land contamination is being considered within a development, the objective is to ensure that the site is suitable for its intended use. Risks would require consideration in accordance with the contaminated land statutory guidance as a minimum.' As the site is not brownfield land and is outside the borough council boundary, the potential for unacceptable risks in the borough is limited. No cross-boundary risks from contaminated land are identified in the information submitted.	The Applicant welcomes this comment and notes that no cross-boundary risks from contaminated land are identified in the DCO Application.



Reference number	Representation	Applicant response																																								
BCKLWN43	We are not aware of significant contaminated land in the Borough Council area in the vicinity of the proposed development. However, the Applicant should be aware that an abandoned MOD fuel pipeline runs north south through the site.	The abandoned MOD fuel pipeline has been identified in the early stages of site evaluation and has been considered during the development of the Scheme. Table 11 of the oCEMP [APP/7.6.1] includes pre-construction commitments in consideration of existing utilities, such as the use of ground penetrating radar before excavation to identify any unknown utilities, and liaising with all utility providers with assets in the area in regard to construction timelines, activities, proximity to assets and construction management measures.																																								
BCKLWN44	The submitted Construction Environmental Management Plan and Soil Management Plan should help to manage any potential impacts from contaminated land and should contribute the sustainable use of soils.	The submitted oCEMP [APP/7.6.1] and oSMP [APP/7.13.1] contain measures that help to manage any potential impacts from contaminated land and contribute to the sustainable use of soils.																																								
BCKLWN45	Air Quality Para 5.2.8 of EN1 requires air quality assessments to take place as part of an Environmental Statement. As noted above, access routes may be via the Borough Council's area. We have therefore previously provided comments on air quality and in that earlier response, we agreed that construction vehicle emissions could be scoped out for further and more detailed air quality assessment based on IAQM screening criteria, as long as sufficient information was provided on vehicle movements (24-hr Annual Average Daily Traffic (AADT)) during the construction and decommissioning phases	Paragraph 16.4.9 of ES Chapter 16: Other Environmental Matters [APP-065] states that the maximum construction vehicle movements on any single road link are predicted to be 368 two-way LDV AADT movements and 86 two-way HGV AADT movements on the A1065 South, which splits further (50% in each direction) on joining the A47 (no construction traffic is expected to route further south on A1065 Castle Acre Road through Swaffham). As can be seen, the construction traffic vehicle movements do not exceed the screening criteria for detailed assessment on any road link in the local network, as set out in the EPUK and IAQM guidance, which states an AADT threshold of 500 LDVs and/or more than 100 HDVs. The presented construction traffic vehicle movements are representative of peak construction and are expected to be lower for most of the construction phase.																																								
BCKLWN46	In terms of the requested information on vehicle movements, Table 6.7 within the Transport and Access Chapter lists the affected road network and provides AADT but only as percentages not actual numbers of vehicles as required for air quality purposes. Road link 9 is within the Borough Council's area but no construction traffic is planned along the route.	Table 6.7 of ES Chapter 9: Transport and Access [APP/6.2.1] presents the additional construction traffic from the Scheme. It is noted that Norfolk County Council have since requested that Route C (via South Acre road) is not used by LGVs, but even with this revised distribution of LGV/staff traffic there is no material change to the construction impact. For completeness, the revised construction traffic impact per link is presented below in absolute vehicle numbers as also presented within the updated version of ES Chapter 9: Transport and Access [APP/6.2.1] <table><tr><th>Link</th><th>Link Name</th><th>Proposed Total Vehicles</th><th>Proposed HGVs</th></tr><tr><td>1</td><td>A1065 South</td><td>464</td><td>86</td></tr><tr><td>2</td><td>A1065 MID</td><td>387</td><td>10</td></tr><tr><td>3</td><td>South Acre Road North</td><td>0</td><td>0</td></tr><tr><td>4</td><td>A1065 North</td><td>164</td><td>10</td></tr><tr><td>5</td><td>South Acre Road South</td><td>0</td><td>0</td></tr><tr><td>6</td><td>West Acre Road</td><td>0</td><td>0</td></tr><tr><td>7</td><td>Narford Lane</td><td>0</td><td>0</td></tr><tr><td>8</td><td>River Road South</td><td>0</td><td>0</td></tr><tr><td>9</td><td>River Road North</td><td>0</td><td>0</td></tr></table>	Link	Link Name	Proposed Total Vehicles	Proposed HGVs	1	A1065 South	464	86	2	A1065 MID	387	10	3	South Acre Road North	0	0	4	A1065 North	164	10	5	South Acre Road South	0	0	6	West Acre Road	0	0	7	Narford Lane	0	0	8	River Road South	0	0	9	River Road North	0	0
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BCKLWN47	Transport Assessment (TA; Appendix 9.2) explains that the routing for HGVs will be secured by way of a requirement in the DCO through a detailed CTMP. The agreed routing strategy is for HGVs to primarily arrive from the A47 to the south of the site within Breckland Council area, and with access via the A1065, which forms the preferred Route A of this CTMP. This is set out in the ES (Figure 9.2). It adds that subject to the sourcing of the relevant materials, there may also be a nominal level of HGVs arriving from the north via the A1065. The TA added that it is not proposed for any HGVs to access the Scheme via Route C (Narford Lane route).	HGVs will only arrive via the A1065, as secured through the oCTMP [APP/7.7.1] and through the detailed Construction Traffic Management Plan, secured by way of requirement in the DCO.
BCKLWN48	The construction traffic levels in the Borough Council's area are therefore less than the IAQM screen for air quality assessment. Therefore, as long as the CTMP is implemented as set out we would have no objection, as the road links in our area not anticipated to be used for construction purposes. Once operational PV panels and batteries will need to be replaced, but traffic levels will be much reduced when compared to construction period.	The draft DCO [APP/3.1.1] includes a requirement for a detailed Construction Traffic Management Plan to be provided prior to commencement. With the detailed Construction Traffic Management Plan secured by way of requirement and the future contractor being obligated to comply with its requirements, the effects of construction traffic will be appropriately mitigated.
BCKLWN49	For construction dusts, the IAQM guidance on Assessment of Dusts from large construction schemes such as this scheme, refers to receptors up to 250m away being potentially impacted and in some instances for actual monitoring for those living nearest. Given the DCO Order limits are more than 250m from BCKLWN area we would have no comment to make in terms of air quality (human health) matters for the CEMP. Impacts from dust on residential amenity is considered above.	The Applicant notes of this comment.
BCKLWN50	BMV Para 5.11.12 of EN-1 sets out that 'Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).	An explanation of how the Applicant considered land quality as part of embedded mitigation is set out in section 11.7 of ES Chapter 11: Soils and Agriculture [AS-018] . The Order limits is mostly within the area identified as a low likelihood of BMV (see Plate 11-24). Having identified the detailed land quality of the Order limits, as set out in section 11.7, and the oSMP [APP/7.13.1] , impacts on agricultural land quality are to be minimised by good practice. The residual effects are as described in ES Chapter 11: Soils and Agriculture [AS-018] .
BCKLWN51	The project would result in the loss of BMV land. The Agricultural Land Classification (Appendix 11.2 – APP/6.4) sets out the grading of a total of 829.4ha of land (the Application Cover Letter, Appendix 1.1 states the total order limit is 838.77ha). 17.5ha is graded as Grade 1, 276.4ha as Grade 2, 160.9ha as Grade 3a. This results in approximately 55% of the site falling within the definition of Best and Most Versatile (BMV) agricultural land. Whilst the 60 year decommissioning timeframe set out by Requirement 20 is noted, the loss of BMV, particularly in combination with other schemes across Norfolk as a whole is a concern for the Borough Council.	The effects on land of BMV quality, and the small areas adversely affected, are set out in ES Chapter 11: Soils and Agriculture [AS-018]. There is no policy that requires agricultural land of BMV or non-BMV quality to be farmed, and the implications for food production and the local land-based economy are set out in ES Chapter 11: Soils and Agriculture [AS-018] sections 11.8 and 11.11. The land quality of the land across the Order limits is described in section 11.6 of ES Chapter 11: Soils and Agriculture [AS-018]. The site selection process identified that, from published material, the area chosen was likely to be some of the poorest agricultural quality in the wider area: see Plates 11-23 and 11-24 in section 11.7. The land quality is mixed, with most of the land falling into grades 2 good quality, subgrade 3a good quality and subgrade 3b moderate quality of the ALC. The distribution of these grades across the Order limits is shown on the ALC map insert at Plate 11-3 of ES Chapter 11: Soils and Agriculture [AS-018]. The proportion of land that is of BMV quality is shown in Table 11-4, which is 54% of the Site. The amount of land by ALC grade that is affected by temporary or permanent disturbance is summarised in Table 11-7 of ES Chapter 11: Soils and Agriculture [AS-018], and amounts to 38ha of BMV. The majority of this, except for 4.5ha for the National Grid Substation and Grid Connection Infrastructure, will be restored to comparable grade on decommissioning. Solar farms do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. They do, however, limit opportunities for arable farming uses.



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		The potential effects on food production locally and nationally have been assessed in ES Chapter 11: Soils and Agriculture [AS-018]. There is no policy that requires agricultural land to be farmed for food production. As noted in paragraph 11.8.100, as of 1 June 2025 some 444,000 ha of arable land in the UK was in agri-environmental land use (i.e. funded for non-production uses). The Organisation for Economic Co-operation and Development and the Food Agriculture Organisation's (OECD-FAO) joint study does not predict a worldwide shortage of food over the next 10 years, as stated in paragraph 11.8.102 of ES Chapter 11: Soils and Agriculture [AS-018], nor does the UK Government. The biggest threat to food security is considered to be crop failure due to climate change, the Solar Roadmap advises, which solar farms are helping to tackle. There will be impacts on the wider rural economy resulting from the change from the current farming practices, but there will also be benefits. The management of sheep involves more labour per hectare than most arable cropping, and offers economic benefits for other parts of the wider rural economy. The impacts should, therefore, be considered in context. Currently, approximately 11% of arable land is not in production but is funded under agri-environmental land management schemes (444,000 ha). Overall, ES Chapter 11: Soils and Agriculture [AS-018] concludes that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production. ES Chapter 11: Soils and Agriculture [AS-018] section 11.11 considers the cumulative effects with other large-scale solar proposals and concludes that the cumulative effect is also small, around 1% of farmed land in Norfolk.
BCKLWN52	In-combination Effects The Borough Council support the concerns of Norfolk County Council and Breckland District Council in regard to the in-combination effects of solar developments across Norfolk as a whole. Particular attention is drawn to the potential implications of High Grove Solar Farm to the east of the site which also adjoins Swaffham and the potential in-combination effects on adjoining settlements, in particular in relation to the landscape and heritage assets as discussed above.	Section 6.11 of ES Chapter 6: Landscape and Visual [AS-016] undertook a Cumulative Effects Assessment which included High Grove Solar Farm which concluded that there would be: - significant adverse visual effects during construction for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave; and - significant adverse landscape effects during construction and operation on the E6 North Pickenham Plateau LCA. These significant effects remain alongside the implementation of embedded mitigation measures, in the long term. ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. There were no identified potential adverse visual effects, both standalone and cumulative, upon receptors within Swaffham. Mitigation measures have included: - Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access - Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site - In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting



Reference number	Representation	Applicant response
		species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRow and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. Commitments are made within the management plans submitted as part of the DCO Application to collaborate with High Grove Solar Farm, where relevant and appropriate. Section 5.15 of the oCTMP [APP/7.7.1] commits to the preparation of a joint CTMP with High Grove Solar Farm in the event that the construction periods overlap (which is not considered likely) which will set out construction traffic management and control measures relevant to those areas where the construction vehicle routes for the respective schemes overlap. The oLEMP [APP/7.11.1] commits to collaboration with High Grove Solar Farm on the planting proposals to ensure that there is a smooth transition of the "look and feel" between the two Schemes. The oOEMP [APP/7.6.1] has been updated at Deadline 1 to include a commitment for the Applicant to collaborate with High Grove Solar Farm during the detailed design stage of the Scheme to explore mitigation measures across both projects and seek to achieve cumulative noise levels that do not exceed 35dB(A) at The Off Barn receptor during the operation phase.
BCKLWN53	Grid Connection and Gate 2 BCKLWN have previously discussed the lack of Gate 2 Grid Connection Offer with the Applicant. This response and our engagement is based upon the plans and supporting information as submitted. The lack of a formal connection offer raises concerns from the Borough Council's perspective as to the uncertain details of the proposal. Ultimately, it is a matter for the Examining Authority to consider whether or not the proposal has been suitably detailed to allow assessment of the significant effects on the environment and to comply with the relevant regulations.	A reason for receiving a Gate 1 notification was not provided by NESO. Notwithstanding this, the Applicant issued a document to Local Authority stakeholders, including Breckland Council, in March 2026 explaining the Gate process and position in respect of this project. The document states that in the past, "it was a "first come, first served" system, with no restriction on the volume of applications that could be made for new connections. That created a huge backlog, with hundreds of projects holding grid slots even if they were not ready to be built." and that "Now, projects are being prioritised based on being 'ready' and 'strategically aligned' with government's criteria at regular 'Gate Windows'. The Window gives NESO an opportunity to assess all connections collectively in order to inform a more efficient network design. Where they are deemed ready and 'strategically aligned' at any Gate Window, projects will be given a 'Notification' that they will be 'Gate 2'. All other projects will be Gate 1." The Applicant notes that whilst "NESO are yet to confirm when the next Gate Window is...this will be the next opportunity for projects at Gate 1 to move to Gate 2." In regard to projects in Gate 1, these will "not be given a confirmed grid connection date or location in the offers released later this year. This does not mean their connection has been cancelled. It



Reference number	Representation	Applicant response
		means they are not being prioritised in this first Gate Windows round and will be looked at again in future rounds.” In terms of what this means for the Scheme, the Applicant can aim to secure a connection in a future round but that this does not preclude the Scheme from progressing through to a decision given the Applicant's expectation is that NGET will determine that the proposed location for the National Grid Substation is suitable (given the Applicant's site selection methodology being akin to NGET's site selection process). However, the Applicant retains the ability to separately seek consent for the grid connection from the Customer Substation to the National Grid Substation in the unlikely event that NGET subsequently decides that they would prefer to site the National Grid Substation elsewhere. To confirm, the Applicant has secured the requisite land rights and therefore complied with its contractual obligations to “obtain land and consent” for the National Grid Substation under the terms of the grid connection offer. The Applicant wishes to add that it is an established principle that an applicant is not required to deliver a connection to a generating station as part of a DCO application for that generating station, provided that a connection agreement is in place. In other words, it is not a barrier to granting consent for a generating station if the point of connection is not yet identified or consented.
BCKLWN54	As noted during pre-application discussions, the position of key infrastructure is a key concern for BCKLWN, and any change to the grid connection would likely result in knock on impacts, for example on the incredibly sensitive historic setting or the surrounding landscape and this may alter the Borough Council's stance to the development as a whole.	Having a Gate 1 connection offer means there is not yet a confirmed grid connection location or date to connect for the Scheme. However, project development will continue and the Applicant can apply again to move into Gate 2 in future rounds. The Government is clear that the Clean Power 2030 Action Plan and Connections Reform is not about stopping projects, but is about prioritising projects for 2030, while maintaining a robust pipeline beyond 2030. Projects which continue to demonstrate they are 'ready' are expected to be re-prioritised, especially as the government continues to refine its criteria for 'strategic alignment'. It is also anticipated that some projects currently in the queue may drop out. The Applicant will keep developing the Scheme with the aim of securing a Gate 2 connection in a future round, and the Applicant will keep local representatives and communities updated as matters progress. That the Scheme includes as associated development the proposed grid substation for the scheme reduces uncertainty around the deliverability of that connection, if the Scheme is to be consented. The impacts of the Scheme on heritage assets and the surrounding landscape have been assessed on a worst-case basis in ES Chapter 6: Landscape and Visual [AS-016] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The location of the National Grid Substation, Customer Substation, and BESS has been selected to reduce the impacts on heritage and landscape, through the processes of environmental testing and consultation that have been undertaken in preparing the DCO Application, as summarised in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053].
BCKLWN55	Other matters - Batteries New National Fire Chiefs Council (NFCC) guidance – The Borough Council note that updated guidance was released by the NFCC following submission of this application. It is assumed that the proposal will align with the principles within this updated guidance.	NFCC Planning Guidance 2026 is acknowledged; the Site has been cross-referenced against this and remains aligned.



2.4 RR-054, Sporle with Palgrave Parish Council

Reference number	Representation	Applicant response
PPC1	The cumulative impacts on landscape and views Considerable effort was put into Sporle with Palgrave Parish Council's (PC) response to the statutory consultation regarding the impact of the Drovers scheme on landscape and visual amenity. Whilst welcoming the additional 'photowire' photomontages taken from Viewpoint 8 as shown in Figures 6.12 (6.3 Environmental Statement Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires (Part B)) and Figure 6.13 (6.3 Environmental Statement Figure 6.13 PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires - Part B); these only give a partial view of the impact on users of the Peddars Way, and Southacre Road.	ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape, including the Peddars Way and Southacre Road, are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. There is limited intervisibility of the Scheme from Sporle, situated to the east, as shown on ES Figure 6.7: Visual Receptor Groups [APP-084]. Potential visual effects for visual receptors located within VRG 4 have been considered and assessed in detail within ES Chapter 6: Landscape and Visual [AS-016]. As noted, viewpoint 8 has been assessed from within this VRG, as shown within ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088]. A number of visualisations of the Scheme have been produced from viewpoint 8, situated within VRG 4, which are included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. It is noted that Viewpoint 8 and 1 are from singular locations along the Peddars Way and Norfolk Coast Path and South Acre Road respectively, however these are representative viewpoints and are included to represent a view that may be experienced by that receptor or from within that Visual Receptor Group. Whilst users travelling along the Peddars Way and Norfolk Coast Path and South Acre Road would have views of the Scheme and High Grove Solar Farm from different locations along that route, the in-combination effect of this upon potentially sequential views along these routes has been judged to be not significant. This is primarily due to the relatively limited visibility towards the Scheme aided by the screening effect of existing woodland, hedgerow and trees, undulations in local topography and, once established, new tree, hedgerow and woodland planting proposed as part of the Scheme.
PPC2	Figure 6.7 Visual Receptor Groups shows the areas of concern to be in VRG4 with most places being able to see both solar arrays and substation superstructure. The PC would have expected additional photomontages to have been taken at some of the points placed on Figures 1 and 2 included in the PC's statutory response to provide a better assessment of the impact.	The response to PPC1 outlines the visualisations provided which supported the assessment within ES Chapter 6: Landscape and Visual [AS-016]. Viewpoint 8 has been assessed, which is located within VRG 4, as shown within ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088]. A number of visualisations of the Scheme have been produced from viewpoint 8, situated within VRG 4, which are included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. It is notable that the ZTV, ES Figure 6.7: Visual Receptor Groups [APP-084], only demonstrates potential visibility of the Scheme, from within the study area, taking account of the existing vegetation. The ZTV does not take account of extensive mitigation measures embedded within the Scheme which are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1].



Reference number	Representation	Applicant response
PPC3	Particularly to note are the viewpoints shown as VP46 and L1 (south of Gt Palgrave on the Peddars Way and north west of Round Covert on Fincham Drove respectively). The views between these points would highlight the cumulative impact created by the proposed most northerly three fields of the High Grove scheme shown in Figure 1 mentioned above and Drovers solar arrays in fields 21, 23, 24, and 25. (This would be worst case as the PC has requested RWE to take these out of the scheme.) It is likely that this would create a significant, major adverse impact on the landscape and visual amenity. This would be as a result of the fore ground, mid view and far views all containing solar arrays and aggravated by the undulating landscape.	It is not clear what this comment is referencing with regard to viewpoints and figure numbering. ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. Section 6.11 includes a Cumulative Effects Assessment which includes High Grove Solar Farm. Potential visibility of the Scheme and in particular Solar PV Arrays within Fields 21, 23, 24 and 25, from Viewpoint 8 along the Peddars Way and Norfolk Coast Path, has been included within visualisations within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045] take into account mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape, including the Peddars Way and Norfolk Coast Path and Southacre Road. These mitigation measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. Mitigation measures have included: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRoW, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers, from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2]. The Scheme would be offset from existing PRoW by a minimum of 15m, to respect the amenity and experience for PRoW users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site; and



Reference number	Representation	Applicant response
		As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the Study Area to provide recreational benefits.
PPC4	It is noted that the Applicant's response in appendix G APP/5.2 acknowledges moderate significant adverse effects within the Site itself but judges no significant adverse landscape affects outside of the Site. However, they do acknowledge significant visual impact on PRow users of PRow Sporle with Palgrave BR5. The Applicant also concludes that receptors in VRG4 would experience no significant cumulative visual effects as a result of both the Scheme and High Grove.	ES Chapter 6: Landscape and Visual [AS-016] acknowledges in Section 6.11 that <i>"during the construction and decommissioning phases, the short term temporary in combination effect upon this VRG would be of medium-low magnitude. The overall effect would be of Moderate significance. This effect would be adverse and significant for users of PRow Sporle with Palgrave BR5."</i> It goes on to also state that <i>"elsewhere within this VRG, there would be no significant sequential or in combination cumulative visual effects for users of the Peddars Way and Norfolk Coastal Path."</i> ES Chapter 6: Landscape and Visual [AS-016] also acknowledges that the overall effect on VRG 4 would be of moderate significance. The assessment also notes that this effect would be adverse and not significant.
PPC5	The PC would make the comment that further work should be done to assess the issues described above and looking at further work with High Grove in consultation with the PC to mitigate the impacts as this landscape and the associated views are important to the community as stated in the PC's statutory consultation response.	The Applicant notes this comment. Further collaboration with High Grove Solar Farm will be undertaken with regard to the planting approach for mitigation measures. The oLEMP [APP/7.11.1] states in paragraph 7.2.32 that <i>"planting mixes shown indicatively in the following section below will be reviewed further post consent and in collaboration with planting proposals for High Grove Solar Farm to ensure that there is a smooth transition of the "look and feel" between one solar farm and another."</i> The smooth transition between High Grove Solar Farm and the Scheme would limit further cumulative effects upon landscape character by ensuring new planting is well considered, connected and characteristic of the local landscape.
PPC6	The oLEMP included in the DCO application (appendix 7.11) details the outline plans for hedgerow management and tree planting. In relation to the comments above the PC would wish to ensure that the planting of further hedgerow standard trees be sufficiently close to provide adequate breaking up of the visual impact of arrays to take into account the rising landscape up to Round Covert and Fincham Drove. This would be in existing hedges along the A1065; between fields 25 and 24; 21 and 24; 21 and 22; and 24 and 23.	The Applicant notes this comment. Many of these existing hedgerow locations are already proposed to be strengthened with additional hedgerow trees. These are depicted by dark green lines on the Green Infrastructure Strategy Plans which are noted in the legend as <i>"Existing hedgerows (including those with hedgerow trees) to be retained and gapped up with species rich hedgerow; and strengthened with additional hedgerow trees."</i> To confirm, the Applicant's in agreement with this approach, the oLEMP [APP/7.11.1] has been updated at Deadline 1 to confirm the planting of trees, some of which will be 'standard' in size, within existing hedgerow along the A1065; between Fields 25 and 24; 21 and 24; 21 and 22; and 24 and 23.
PPC7	The cumulative uptake of agricultural land in Norfolk in document App/6.2 ES vol 2, chapter 11: Soils and Agriculture paras 11.11.12 & 13 the schemes considered for their cumulative effects with the Drovers are the High Grove and East Pye schemes. The PC would want to comment that this is only part of what has been built, planned or in planning currently in Norfolk. A wider assessment of the cumulative uptake in land for all solar and other renewable energy projects has not taken place. This still is of wider concern in Norfolk where it is having to bear an unfair burden of renewable projects needed for the country as a whole to reach Nett Zero.	ES Chapter 11: Soils and Agriculture [AS-018] cumulative assessment in section 11.11 is limited to NSIP schemes in Norfolk. The reason for this is provided in ES Appendix 2.4: Cumulative Schemes [APP-136] in the table under soils and agriculture, as stated: <i>"For cumulative developments which are allocated through local policy, or where planning consent has been granted, the resultant loss of any BMV land has been accepted in planning terms and therefore considered as part of the baseline environment. Therefore, it is not considered necessary to consider cumulative effects on BMV agricultural land from allocated or approved cumulative developments which are not NSIPs in Norfolk are not considered further in the cumulative effects assessment on BMV agricultural land."</i>
PPC8	The position of the BESS and customer and National Grid substations It is noted that substations and BESS have been located in fields 24 and 27 and the PC has previously welcomed this. However, these fields are sloping as has already been highlighted in responses to consultations. The PC would comment that these fields slope significantly and the levels that the BESS and substations are founded should ensure that there is a minimum of visibility and impact on the landscape particularly to those receptors in VRG4.	Proposed levels within Fields 24 and 27 would be confirmed at the detailed design stage, once the final extent of the Scheme is known. At this stage, the Scheme is only defined as a series of maximum design parameters.



Reference number	Representation	Applicant response
PPC9	The PC is pleased to see that the Applicant's preferred design is for a 'double turn' which allows for the existing OHL to be decommissioned avoiding a double line of pylons. However, the PC would comment that retaining the optionality of keeping the existing line of pylons and the new diversion is of concern. Notwithstanding the reasons stated in the Applicant's response to the PC's consultation responses, the impact of a double line of pylons on the landscape and visual character to the area should take a very high priority in decisions relating to the grid connection.	The Applicant has developed a concept design for a 'double turn in' which is its preferred approach, engagement with NGET is ongoing due to the Connection Reform process and 'in the event the Applicant's preferred approach is unable to progress, the Applicant has allowed flexibility for a 'single turn in'. The Environmental Statement has assessed this scenario; further information can be found in ES Chapter 5: The Scheme [APP/6.1.2]. The flexibility within the parameters set out within the Design Principles, Parameters and Commitments [APP/5.8.1] and the Works Plan [APP-009] allows for either a double turn in of both 400kV circuits or a single turn of one of the 400kV circuits into the National Grid Substation. This is to allow for flexibility at this stage whilst further technical design and configuration work and engagement with NGET is undertaken. ES Chapter 6: Landscape and Visual [AS-016] and accompanying visualisations have accounted for the worst-case scenario with regard to consideration of retention of existing pylons alongside the new Grid Connection Infrastructure. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.
PPC10	The use of Tracker and Fixed PV panels It is noted that at this stage it is not known whether tracker or fixed panels will be used or where. This will have a significant bearing on the landscape and visual amenity. The PC would wish to see that the landscape and visual impact of the choice of panels having a high priority within the design process and that the DCO reflects this.	ES Chapter 6: Landscape and Visual [AS-016] and accompanying visualisations have accounted for the worst-case scenario with regard to consideration of the height of different types of Solar PV Arrays. With regard to Solar PV array type, the potential landscape and visual effects detailed within ES Chapter 6: Landscape and Visual [AS-016] considers a worst-case scenario, i.e. the 'tallest' maximum design parameters (i.e. the 4.5m tracker panels) of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.
PPC11	BESS Fire Safety The oBMP (APP/7.14) includes Table 6.1 that assesses the project's compliance with current NFCC requirements. The PC would comment that the current design only meets the minimum requirements in most cases. They would wish to see these requirements exceeded in further development of the design to reduce the risks of fire and its consequences although recognising that the actual model/manufacture of BESS has yet to be selected.	The oBSMP [APP/7.14.1] reflects the previous 2022 edition of NFCC Planning Guidance, which in the intervening has been updated, latest edition having been published Feb 2026. The more recent edition has reduced some of the requirements in key areas of Emergency Water Supply (minimum volume reduced from 228,000l to 180,000l), spacing (reduced from 6.0m to 0.9m), cleared vegetation requirements (reduced from 10m to 3m). The distance to the nearest occupied building has increased to 30m (from 25m). Given these changes and adherence to the current design and layout the minimum requirements are exceed in terms of water supply, BESS spacing and scrubbed vegetation. The Site is still more than 30m distance from any other occupied building.
PPC12	They note that this extends to the emergency water tanks, currently two in number but no size given. This is of particular concern in terms of possible vegetation fires in dry, hot weather. It is noted that a minimum of 10m gap between BESS and vegetation is called for and that within the fenced in area it will be gravelled or hard roadway. This calls for good weed growth prevention and good management.	The volume of the emergency water tanks will align with current NFCC Planning Guidance and be a minimum of 180,000l. Current NFCC Guidance (2026) calls for 3.0m cleared vegetation only. Areas within 3.0m of BESS are laid out to gravel and this is maintained and kept free of vegetation through the lifetime of the Scheme, see oBSMP [APP/7.14.1].
PPC13	It is noted that the BESS will be controlled by a centralised Operational Control Room. It is presumed that this will be remote to the site. The PC is not sure what	The Site data is transmitted via mobile signal and has a backup landline. Should both fail, the OCR will raise an alert and the site charge and discharge functionality disabled until transmission of data is resumed.



Reference number	Representation	Applicant response
	system will be in place if there is an emergency on site and the internet is down. The oOEMP (APP/7.8) states that there will be no permanent on site staff.	
PPC14	The cumulative socio-economic impacts on the wider agricultural support industries ES Chapter 11: Soils and Agriculture (APP/6.2) assesses the impact of the Scheme on the farming businesses who are giving up the arable land to be used. ES Chapter 14: Socio Economics (APP/6.2) takes up this assessment as part of looking at the wider picture in the area. However, neither assess the likely cumulative impact on the highly developed local agricultural support industries such as farm machinery dealerships, hauliers and agricultural merchants, caused by the loss of arable land, both from this Scheme, and all the other solar developments within Norfolk. These are crucial to rural communities in terms of employment and the local economy.	The overall loss of employment arising from the conversion of agricultural land is expected to be negligible. An assessment by the Applicant indicates that current on-site employment is in the range of 10–15 direct Full Time Equivalent (FTE) jobs, which would be displaced during the construction phase. ES Chapter 14: Socio-Economics [APP-063] states that the agricultural activities affected within the proposed PV module areas operate on a rotational basis and can be relocated to land outside the Site. As such, although some disruption and operational change may occur, these effects are not expected to lead to business closure or long-term loss of viability. Given the limited scale of existing on-site agricultural employment, and the possibility of relocation, indirect effects on associated jobs, such as lorry drivers and agricultural machinery mechanics, are also expected to be limited. However, this temporary loss would be offset by employment generated through the construction of the Scheme, which is expected to support approximately 145 net additional jobs over a two-year period, with between 285 and 575 roles anticipated to be taken up by residents in the Local Construction Area (LCA) as stated in ES Chapter 14: Socio-Economics [APP-063]. During the operation and maintenance phase, arable activities would likely cease due to the presence of solar panels. There is potential for alternative agricultural uses, such as sheep grazing beneath and around the panels. Overall, the level of on-site labour is not expected to change materially. While precise estimates are not available, a shift from arable production to sheep-based enterprises (if this were to occur) would generally involve similar labour requirements, including indirect jobs linked to on-site activity. As a result, operational employment was scoped out of the assessment at the scoping stage, as agreed with PINS, on the basis that it is unlikely to give rise to significant effects. It has therefore not been assessed. In addition, the Applicant does not anticipate significant cumulative effects on agricultural support industries. This reflects the limited scale of agricultural employment affected, the potential for activities to be relocated or replaced (e.g. sheep grazing, if this were to occur), and the fact that the operational land uses of other solar schemes are not fixed and may also retain some agricultural activity. As such, the effect is expected to be limited from a cumulative perspective.
PPC15	Road traffic impact during construction phase of the scheme The PC would wish to comment on the likelihood of significant cumulative impact of construction traffic along the A47 and A1065 as a result of possible works taking place at the same time as the High Grove scheme that will also have access points along the A1065 prior to access points A B & C as shown on Figure 2-1 of the oCTMP (APP/7.7). In addition, the impact of construction traffic for the Jafa solar development (BC planning PL/2025/1788/VARMAJ) near Little Dunham where it is likely that traffic will take the A1065 from the A47 as far as Newton by Castle Acre where it will turn right to access that project via local byways.	The cumulative transport effects of the Scheme are considered within section 9.11 of ES Chapter 9: Transport and Access [APP/6.2.1], which concludes there are unlikely to be any significant cumulative effects. With the proposed restrictions on vehicle routing, secured through the detailed Construction Traffic Management Plan, the primary road where cumulative effects could occur is on the A1065. However, from the recorded flows along the A1065 presented within section 2.4 of the ES Appendix 9.2: Traffic Assessment [APP-163], the typical daily traffic variations along the A1065 could be in the region of 794 to 985 total vehicles each day, (exceeding what is generated by the Scheme during the peak) which based on the thresholds set out in the IEMA EATM Guidance (2023) referred to within ES Chapter 9: Transport and Access [APP/6.2.1], would fall within typical daily traffic fluctuations which are recognised as being in the order of 10% and well below the 60% threshold, above which significant transport effects may occur. In the event there is any overlap, there may be an increase in HGVs, however there will be collaboration within the forthcoming cumulative sites, as detailed within Section 5.15 of the oCTMP [APP/7.7.1] that is to be secured by a requirement in the DCO, to ensure opportunities to minimise overlaps between HGV deliveries and so that construction peaks are planned into the programmes accordingly so cumulative effects are mitigated.
PPC16	This increased traffic load will affect Sporle residents who use South Acre Road, Newton Road and Ruckhold's Lane to access the A1065 as well as crossing it to South Acre and Castle Acre. Therefore, the PC would wish that the CTMP be	The proposed routing for construction vehicles in the oCTMP [APP/7.7.1] restricts any HGV access via Castle Acre and South Acre, with HGVs proposed to only access via the A1065 to the east.



Reference number	Representation	Applicant response
	produced in consultation with the developers of the other projects mentioned above as well as the parish councils of the villages impacted including those mentioned above. This would need to include numbers and types of vehicles as well as timings of journeys.	As requested by Norfolk County Council, the oCTMP [APP/7.7.1] has been updated to include a commitment that all vehicles (including staff) will access the Scheme from the A1065, avoiding any impact to the local roads in South Acre and Castle Acre. In direct response to the request, the updated oCTMP [APP/7.7.1] includes commitments on the consultation and engagement procedure to ensure all relevant parties are involved and consulted in the construction traffic arrangements.
PPC17	Deer Management The Applicant's response to the PC's statutory consultation response only recognises that all the fields of solar arrays will be surrounded with deer fencing as shown in Plate 13 in 6.1 ES Chapter 5: The Scheme. This is at the heart of local concern as it will concentrate deer movements with likely accidents on the A1065 and other roads and tracks around the Site.	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. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation, as detailed within Section 7.7 ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] and secured within Design Principles, Parameters and Commitments [APP/5.8.1] .
PPC18	The Baseline Ecological Survey Report (6.4 ES Appendix 7.2) states in paragraph 5.6.3 that Roe Deer and Muntjac were seen during survey work but no effort has been made to understand the level of deer presence and activity. Despite the PC's request in its response to the statutory consultation, no survey of deer numbers has been undertaken, nor a deer management plan undertaken with surrounding landowners and the High Groves development.	Deer species do not receive direct legislative protection relevant to ecology or nature conservation, whilst deer species are not listed as Priority species, albeit may receive protection against acts of cruelty (for example, under the Wild Mammals (Protection) Act 1996). Impacts on mammal species in relation to nature conservation and biodiversity are considered within ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] , which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. Woodland habitats likely providing the focus of existing deer use will remain outside of the protection fencing, with wide corridors in particular along the droves which will provide continued routes through the site for deer. These routes will therefore remain largely unchanged from the existing position.
PPC19	It is noted HM Government's introduction of the England Deer Strategy will require this to be taken into account to ensure numbers are kept in check and to ensure BNG targets are achieved.	HM Government's England Deer Strategy sets out actions proposed in England to ensure the impacts of wild deer are not a threat to environmental, social and economic goals (www.gov.uk). Draft LNRS Potential Measure O4, contained within the oLEMP [APP/7.11.1] , includes potential for management of deer populations to reduce browsing pressures and enhance natural regeneration of woodland.
PPC20	Community Fund It is noted that the Applicant's response to the PC's statutory consultation response that they remain committed to ongoing dialogue with the local community and states that community benefits have been consulted on throughout the pre application process and that ongoing discussion will inform how funding is best distributed. Although the Applicant is proposing a community benefit fund and states that it will be independently administered by a local foundation (5.2 Consultation Report Appendix H Section 47), there is still no information on levels of funding for communities affected by the scheme or any more detail on its administration. Other developments, such as High Grove have stated levels of funding and are engaging with local communities how this might be administered pre application stage. (On the basis of what High Grove are currently offering the Drovers should be looking to offer at least £7.5 million for community facilities and projects based on its size compared to High Groves – and this is a very small amount in relation to the profits being made and disruption caused).	As stated above, the Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). The Applicant, therefore, is not required provide information as part of the DCO process on the levels of funding for communities affected by the Scheme, nor the administration of the Community Benefit Fund itself. As is correctly identified by Sporle with Palgrave Parish Council, a local foundation will likely independently determine the local initiatives to provide services to the community that are chosen to benefit from the Community Benefit Fund. As for the levels of funding to be provided, the Applicant notes that the Community Benefit Fund would be calculated based on the Scheme's consented generating capacity (MW per year) and delivered in line with industry standards for renewable energy projects. The Applicant welcomes further engagement with Sporle with Palgrave Parish Council in relation to the Community Benefit Fund.
PPC21	Community Liaison It is noted that the Applicant in response to the PC's statutory consultation response is open to discussion with Sporle with Palgrave parish council. While welcoming this the PC would comment that this liaison group should	The Applicant notes that Requirement 4 of Schedule 2 of the draft DCO [APP/3.1.1] requires the Applicant to submit "to the relevant planning authority" (i.e. Breckland Council and/or Norfolk County Council) the terms of reference for a community liaison group for their approval. As part of this approval, the Councils are entitled to consult with parishes affected by the Scheme if they deem it necessary to do so, but it is disproportionate (and unprecedented across made solar DCOs) for each parish to be listed as a statutory consultee pursuant to the



Reference number	Representation	Applicant response
	involve all parishes affected by the Scheme and be included as a condition in the DCO.	corresponding requirement in the DCO. The Applicant has, therefore, not amended the wording of Requirement 4 of Schedule 2 of the draft DCO [APP/3.1.1] in this regard.
PPC22	Operational Management The Scheme has an operational design life of 60 years before the proposed decommissioning phase. In its statutory consultation response, the PC made their concerns about maintaining tight management of the Scheme over that period of time. The particular issues of concern being biodiversity loss, poor maintenance of species rich grassland under the solar arrays and bare patches leading to soil erosion or possible increased risk of fire during drought.	The Applicant notes this comment. An oLEMP [APP/7.11.1] , detailing habitat creation, monitoring and management measures is provided as part of the DCO Application, which will become controlled through the detailed Landscape and Ecological Management Plan as a requirement of the DCO. This will ensure effective management of the proposed habitats to ensure meaningful gains for biodiversity.
PPC23	It is noted that an oOEMP (APP/7.8) is now in place as part of the DCO application and this will be governed by Requirement 14 in the dDCO (APP/3.1). However, it is possible that the ownership/operator of the Scheme will change more than once during the 60 years of its operational life. The PC would comment that currently any contractors employed to manage the Scheme would currently be responsible to the Applicant who has responsibility to carry out the DCO requirement. If the entity changes who continues to have this responsibility, what body is monitoring that this is met?	The Applicant confirms that, if consent is granted, it has the capability to build, own, and operate the Scheme. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker is defined in Article 2 of the draft DCO [APP/3.1.1] as the Applicant “<i>and any other person who for the time being has the benefit of [the DCO]</i>” in accordance with the transfer of benefit provisions in Articles 36 and 37 of the draft DCO [APP/3.1.1]. These provisions ensure that any suitably qualified party to whom the Applicant sells or transfers the Scheme will remain bound by the legally enforceable requirements of the DCO, including in relation to compliance with the control documents (such as the detailed Operational Environmental Management Plan). Any breach of the DCO, or failure to comply with the requirements within, can result in enforcement action. In summary, should the Scheme change ownership before any phase of the development, any new owner remains bound by the commitments and obligations set out within the DCO and associated management plans. Any future owner would remain bound by responsibilities to appoint contractors to ensure that all measures within these management plans are delivered.
PPC24	It seems necessary that a community liaison group continues throughout the operational and decommissioning phases to monitor the management of the Scheme. It is noted that a Community Liaison Manager is mentioned in the oOEMP and that the Scheme Operator should continue through the operational phase to have someone dedicated to that role. However, this is only mentioned in Table 3-10 Human Health within the oOEMP. The PC would comment that the role should have a wider remit to all issues covered within the operational management of the Scheme	This comment is noted and the Applicant will take this into consideration.



2.5 RR-013, Castle Acre Parish Council

Reference number	Representation	Applicant response
CAPC1	Harm to the Setting of an Exceptional Heritage Cluster. The proposed Drovers Solar Farm development would cause harm to and have a direct adverse impact on the setting of an exceptional and nationally important heritage cluster, being the historic Villages of Castle Acre and South Acre, directly undermining the historic and experiential approaches to these unique villages eroding their cultural significance.	ES Volume 1, Chapter 8 Cultural Heritage [APP-057] , supported by Appendix 8.2: Stage 1 and 2 Setting Assessment [APP-152] , has assessed the contribution of the Site to designated heritage assets in the surrounding area. In many cases the assessment has found that there is no shared 'experience' of the heritage assets from the bulk of the Site and where meaningful 'experience' is available built elements of the Scheme have been excluded in order to reduce or remove any impact. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the significance of these designated heritage assets are secured by the Design Principles, Parameters and Commitments [APP/5.8.1] , the spatial extents shown on the Works Plan [APP-009] , the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]
CAPC2	The proposed development will introduce large scale industrial infrastructure into an open, rural landscape that forms the historic and experiential gateway to these villages, which is fundamental to their identity, legibility and visitor appeal. Users of the Peddars Way, Nar Valley Way, residents, and visitors alike, would all experience the industrialisation of a previously tranquil and historically coherent landscape. This surely conflicts with NPPF Section 16 Paragraphs 202; 205; 207-8; 212-13 and Local Plan policies that seek to safeguard the intrinsic character and beauty of the countryside.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] , supported by Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] has assessed the contribution of the Site to designated heritage assets in the surrounding area. In many cases the assessment has found that there is no shared 'experience' of the heritage assets from the bulk of the Site and where meaningful 'experience' is available built elements of the Scheme have been excluded in order to reduce or remove any impact. Views of the Scheme where afforded from heritage assets, including the Conservation Areas of Castle Acre and South Acre and their approaches (including the Peddars Way and Norfolk Coast Path and Nar Valley Way), tend to be partial, filtered or oblique. Where afforded, they will be further reduced by mitigation measures (including enhanced hedgerows and new planting scheme), which have been embedded within the Scheme to limit potentially adverse effects upon the significance of these designated heritage assets are secured by the Design Principles, Parameters and Commitments [APP/5.8.1] , the spatial extents shown on the Works Plan [APP-009] , the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1] . There will be no significant effects on the legibility and coherence of the historic landscape, nor to the significance of any heritage asset under the Scheme and there will not be a conflict with the stated sections of the NPPF.
CAPC3	Bartholomew's Hills Substation, additional Pylons and BESS Location. The application fails to demonstrate that reasonable alternatives have been investigated and robustly assessed for the siting of the proposed Bartholomew's Hills substation, pylons and Battery Energy Storage System (BESS). The chosen location occupies a prominent ridge within open and historically sensitive landscape, significantly amplifying visual harm and increasing the risk of damage to archaeological and geological assets through irreversible ground disturbance and permanent loss of BMV Agricultural Land.	ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] has demonstrated the process undertaken in investigating and assessing reasonable alternative locations for the National Grid Substation, Customer Substation, BESS, and Grid Connection Infrastructure. The stages of design and consultation are detailed, with specific design changes and rationale presented in the tables within the chapter. The location of the 'Bartholomew's Hills Substation', as referred to in the Relevant Representation, which is Field 27 and the northern part of Field 24 in ES Figure 3.3: Field Numbering Plan [APP-071] , has been arrived at in consideration of the environmental constraints presented in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] . This includes landscape, visual, below ground heritage, and BMV land considerations, which have all been considered in determining the proposed location for the substations and BESS. The proposed substations and BESS are not situated on a 'prominent ridge'. These elements of the Scheme are situated to the south of the ridge (in Fields 27 and northern part of Field 24) and Bartholomew's Hills plantation which serves to screen views of the Scheme from the historically sensitive landscape to the north.
CAPC4	Insufficient evidence is provided in the application to show that less visually intrusive, less archaeologically sensitive, or less elevated locations were properly considered. The justification for the selected location / site appears to be driven primarily by technical or commercial convenience rather than the minimisation of environmental, landscape, and heritage harm.	Appendix 1 of the Applicant's Planning Statement [APP/5.5.1] contains the Site Evaluation Report , which details the process followed in selecting the site location, including the environmental, landscape, and heritage considerations that fed into this process. Paragraph 4.4.18 details the environmental considerations that fed into the site selection process.



Reference number	Representation	Applicant response
		ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] provides a summary of the site evaluation which considers irradiance and site topography, network connection, proximity to dwellings, environmental considerations, agricultural land classifications and land type and accessibility. The Design Approach Document [AS-009], provides an overview of the design framework and demonstrates how good design aspirations and intentions have cascaded through the Scheme which will be secured as good design outcomes within the detailed design of the Scheme. Sections 6 and 7 of the Design Approach Document [AS-009] explain how the design principles have been applied in the design evolution of the Scheme. ES Chapter 6: Landscape and Visual [AS-016] assesses potential landscape and visual impacts as a result of the Scheme. The substations and BESS are situated to the south of Bartholomew's Hills plantation which serves to screen views of the Scheme from the north, limiting adverse visual effects on visual receptors within Castle Acre, South Acre and the Nar Valley. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. Similarly, ES Chapter 8: Cultural Heritage and Archaeology [APP-057] has assessed potential impacts to heritage receptors as a result of the Scheme and concluded no significant effects in any location.
CAPC5	For a development of NSIP scale, the absence of a transparent and comparative alternatives assessment represents a serious deficiency. With the absence of such an assessment, surely it cannot be concluded that the proposal represents the least harmful option available, which is contrary to national policy requirements.	ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] has demonstrated the process undertaken in investigating and assessing reasonable alternatives relevant to the Scheme. It demonstrates that the design of the Scheme has iteratively developed to reduce the harm of the Scheme on the surrounding environment and sensitive receptors, arriving at the reasonably least harmful option. Further, Appendix 1 of the Applicant's Planning Statement [APP/5.5.1] contains the Site Evaluation Report, which details the process followed in selecting the site location. The Design Approach Document [AS-009], provides an overview of the design framework and demonstrates how good design aspirations and intentions have cascaded through the Scheme which will be secured as good design outcomes within the detailed design of the Scheme. Sections 6 and 7 of the Design Approach Document [AS-009] explain how the design principles have been applied in the design evolution of the Scheme. The Applicant therefore firmly disagrees that there is an absence of a transparent and comparative alternatives assessment.
CAPC6	The Landscape and Visual Assessment, underestimates the magnitude of harm by treating the landscape as visually containable through screening and planting. Such mitigation does not address the fundamental and permanent loss of openness, historic legibility, and time-depth that characterises the Nar Valley landscape and its heritage assets. (The Parish Council notes that the application does not appear to include adequate modelled views illustrating the extent of landscape impact once the development has been constructed, particularly from the A1065).	ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape, including the A1065, are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1] With regard to the permanent nature of change, the Scheme duration is long term but predominantly reversible following the decommissioning phase. The assessment notes the duration of the Scheme being long term reversible, as outlined in Para 6.5.23 <i>"Some forms of development, such as solar arrays, may also result in Long-term effects. Still, the intention is that the Scheme (excluding the National Grid Substation and Grid Connection Infrastructure which are the responsibility of National Grid) would be decommissioned at the end of its defined operational period, and effects would, therefore, no longer occur beyond that timeframe. These are assessed to be Long-term but reversible."</i> With regard to visual openness, ES Chapter 6: Landscape and Visual [AS-016] states in paragraph 6.6.77 that <i>"within the centre of the Site, there is a relatively high degree of visual enclosure between the internal field parcels, predominantly due to the presence of existing mature woodland, hedgerow and hedgerow trees within the Site. The existing vegetation serves to screen or restrict visibility towards neighbouring parcels. Drovers and footpaths within the centre of the Site, such as PRow South Acre RB6, exhibit varying degrees of visual containment. The central and eastern lengths of PRow South Acre RB6 are well enclosed by hedgerow and</i>



Reference number	Representation	Applicant response
		trees, however along lengths of this PRoW to the west there are more open views north and south close to River Road, predominantly due to the complete loss of some aligning hedgerow.” Paragraph 6.6.78 states that “the southern Site area also exhibits some degree of visual enclosure, south of Round Covert. However, where there are gaps in hedgerows and local undulations in landform, such as Site land proximal to the A1065, there are mid to longer distance views out of the Site to the east towards Palgrave.” More detail, with regard to local landscape character and openness, is included within Section 6.6 of ES Chapter 6: Landscape and Visual [AS-016]. Published landscape character for the E6 North Pickenham Plateau LCA (LCT Plateau Farmland) also states “dense, well treed hedgerows concentrated on the network of rural roads and lanes, in addition to localised enclosed lanes and hedgebanks with veteran trees, which impart an historic character to these parts of the landscape and provide evidence of the former landcover pattern”. The proposed planting and mitigation measures serve to enhance and retain the enclosed nature, where present as part of the baseline view, through new hedgerow, tree and woodland planting and management of hedgerow to heights of 3m to maximise visual screening, particular in close proximity to the proposed Customer Substation and National Grid Substation. Visibility from within the Nar Valley and associated publicly accessible heritage assets to the north of the Site is generally limited, and associated with, potential visibility of proposed Grid Connection Infrastructure alongside existing pylons on the skyline. There would be no long term significant adverse visual effects upon receptors to the north of the Site. Potential visual effects upon users of the A1065 have been assessed within Section 6.8. Visibility towards the Scheme would be limited to a short stretch where the road broadly abuts the Site. Viewpoint 1 has been assessed from within this road, as shown within ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088]. Advanced planting, as detailed within the oLEMP [APP/7.11.1], has also been undertaken to ensure potential visibility from the A1065, towards the Scheme, is screened as much as possible.
CAPC7	The scale of development, fencing, access tracks, substations, additional pylons, BESS and associated infrastructure would result in a permanent industrialisation of a landscape whose value derives from its simplicity, continuity and historic coherence. As a result, the proposal conflicts with national and local planning policies seeking to safeguard the intrinsic character and beauty of the countryside, particularly where landscape character is inseparable from heritage significance and tourism value.	With regard to the permanent nature of change, the Scheme duration is long term but predominantly reversible following the decommissioning phase. ES Chapter 6: Landscape and Visual [AS-016] assesses potential long term operational adverse landscape and visual effects based on the Scheme being long term reversible, as outlined in paragraph 6.5.23: “Some forms of development, such as solar arrays, may also result in Long-term effects. Still, the intention is that the Scheme (excluding the National Grid Substation and Grid Connection Infrastructure which are the responsibility of National Grid) would be decommissioned at the end of its defined operational period, and effects would, therefore, no longer occur beyond that timeframe. These are assessed to be Long-term but reversible.” ES Chapter 6: Landscape and Visual [AS-016] assesses the potential landscape and visual impacts as a result of the Scheme for the site and wider study area reviewing the scale of development, fencing, access tracks, substations, additional pylons, BESS and associated infrastructure. The assessment was informed by a desk based review of Landscape Character Assessments, detailed site surveys, an analysis of landscape value of the Site as referred in ES Appendix 6.5 Evaluation of Landscape Value [APP-143] alongside judgements for each Landscape Character Area described in ES Chapter 6: Landscape and Visual [AS-016]. As stated in NPPF paragraph 187, the “intrinsic character and beauty of the countryside”, was recognised in ES Chapter 6: Landscape and Visual [AS-016], supporting ES Appendix 6.5 Evaluation of Landscape Value [APP-143] and ES Appendix 6.6: Extracts from Relevant Landscape Character Assessments [APP-144]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment



Reference number	Representation	Applicant response
		concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. In response to potential impacts, mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape would be secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. Mitigation measures have included: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRow and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits.
CAPC8	The application fails to fully assess the cumulative and sequential impacts of multiple existing, consented and proposed developments, resulting in progressive	ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. Section 6.11 includes a Cumulative Effects Assessment which includes High Grove Solar Farm.



Reference number	Representation	Applicant response
	industrialisation of the historic Nar Valley and surrounding visually sensitive landscape. Relevant sites include: Pickenham Wind Farm & Swaffham Wind turbines. The Burntstorks Solar Farm, Swaffham (operational) Proposed High Grove Solar Farm, Swaffham. Great Friars Thornes anaerobic digestion facility, Swaffham. Existing Carbon Capture compounds at Narford and West Acre.	Paragraph 6.11.7 states that “<i>only one development, High Grove Solar, has the potential to result in cumulative effects on Landscape and Visual within the associated Study Area, set out in Table 6-10.</i>” It is notable that, typically, operational and consented developments are treated as being part of the landscape and visual baseline. As such, the operational schemes referred to have been captured as part of the landscape and visual baseline.
CAPC9	The cumulative effect of these developments represents a significant erosion of landscape character, heritage setting and rural amenity that has not been adequately assessed.	The cumulative effects related to the Scheme on landscape character, heritage setting, and rural amenity have been assessed, as appropriate, in ES Chapter 6: Landscape and Visual [AS-016] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. In terms of landscape character, significant effects have been identified within North Pickenham Plateau LCA when considering the Scheme and the nearby High Grove Solar Farm, for all phases of development. No other significant cumulative landscape character effects have been identified. In terms of visual amenity, one significant cumulative effect has been identified during the construction and decommissioning phases, considering the impact of the Scheme in combination with High Grove Solar Farm. The significant cumulative effect has been identified for users of PRoW Spole with Palgrave BR5 only. No other significant cumulative effects have been identified. In terms of heritage setting, no significant cumulative effects have been identified as a result of the Scheme in combination with the assessed cumulative schemes. The only scheme considered to have the potential for cumulative effects is High Grove Solar Farm, which has been assessed and, due to the embedded mitigation in the form of landscape planting, has not resulted in any significant heritage setting effects. The proposed visual screening, as detailed in the Green Infrastructure Strategy (Appendix A of the oLEMP [APP/7.11.1]), reduces the intervisibility between the Scheme and sensitive receptors.
CAPC10	Impact on Statutory Heritage Assets and Their Setting The proposed solar farm lies within the setting of multiple designated heritage assets, including: 28 Castle Acre Priory (Scheduled Monument) 29 Castle Acre Castle (Scheduled Monument) 30 Castle Acre Bailey Gate (Scheduled Monument) 31 Castle Acre Dyke Hills (Scheduled Monument) Defensive Earthworks. 32 St James the Great Church, Castle Acre (Grade 1 listed) 33 St George’s Church, South Acre (Grade 1 Listed) • The Peddars Way, historic route. (Parts of which are Scheduled Monuments as it was a Roman Road and later used by pilgrims travelling to the medieval shrine at Walsingham. It is now a National Trail).	ES Chapter 8: Cultural Heritage and Archaeology [APP-057], supported by ES Appendix 8.2: Stage 1 and 2 Setting Assessment [APP-152] has assessed the contribution of the Site to designated heritage assets in the surrounding area. In many cases the assessment has found that there is no shared ‘experience’ of the heritage assets from the bulk of the Site and where meaningful ‘experience’ is available built elements of the Scheme have been excluded in order to reduce or remove any impact. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the significance of these designated heritage assets are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. It should also be noted that the Peddars Way and Norfolk Coast Path does not faithfully follow the full course of the former Roman Road and that the stretch between Southacre Road to the northwest of Spole and Bailey Street at Castle Acre (including the stretch along Big Wood Lane) deviates from the course of the Roman Road which lies circa. 1km further to the east (as shown in Figure 4 of Appendix 8.3: Archaeological Desk Based Assessment [APP-153]).
CAPC11	These assets are protected under the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires authorities and decision-makers to preserve their setting. NPPF Section 16 paragraphs 202 – 213 stipulate that “great weight” must be given to conservation of designated heritage assets. Any harm to their setting, even if “less than substantial,” must be convincingly justified and demonstrated to be outweighed by public benefit.	Whilst a technicality, the Planning (Listed Buildings and Conservation Areas) Act 1990 does not require authorities and decision makers to preserve the setting of listed buildings but rather it directs them to pay special regard to the desirability of preserving the setting. Section 3.2 of the Statement of Need [APP-042] explains that the 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 towards 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 Applicant has applied the planning balance in the Planning



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		Statement [APP/5.5.1] and considers that the identified substantial benefits of the Scheme outweigh the residual harms, including to heritage assets, that would arise. Further, the CNP presumption means that these residual impacts are outweighed by the urgent need for the Scheme. The weighted balance is accepted.
CAPC12	The heritage assets referred to are also important when regarded together. There is a direct archaeological and historical association between Castle Acre Castle, (the 12th century planned settlement and its defences) and the Priory (all founded by the de Warennes) above the Roman crossing point of the River Nar.	The contribution of relationships between the Castle, Priory and crossing of the Nar is accepted and described in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] and ES Appendix 8.2: Stage 1 and 2 Setting Assessment [APP-152] . There will be no impact on the element of the Castle and Priory's settings that incorporates the River Nar under the Scheme.
CAPC13	There is also a direct link to the heritage assets of the Nar Valley in the area proposed for the Drovers Solar Farm. The Priory at Castle Acre is one of six religious houses sited along the Nar Valley, these were all visited by pilgrims travelling to the medieval shrine at Walsingham, the second most important religious centre, after Canterbury.	The relationships between heritage assets of the Nar Valley is accepted and described in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] and ES Appendix 8.2: Stage 1 and 2 Setting Assessment [APP-152] . However, there is no direct contribution made to the significance of Castle Acre Priory by the Site, nor will these relationships be compromised or diminished by the Scheme.
CAPC14	While the applicant may characterise the development as temporary, the visual and experiential harm caused by the scale, fencing, permanence of substations, additional pylons, BESS and all associated grid infrastructure of the proposal along with ground disturbance and the long operational lifespan mean the impacts on landscape character, archaeology, soils, and heritage setting will be significant, enduring and in many respects, irreversible, compromising the cultural landscape of one of Norfolk's most important heritage clusters.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein along with potential impacts of the Scheme upon the historic environment. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be negligible at most. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'. These residual effects will not be permanent nor irreversible. After decommissioning, several impacts on designated heritage assets resulting from the operation phase of the Scheme would be reversed, specifically the removal of solar arrays and possibility of returning the land to an agricultural function. The exception to this would be the Grid Connection Infrastructure and National Grid Substation, both of which will not be decommissioned and will remain extant. However, the continued use of these elements of the Scheme would cause no additional impacts to those identified during the operation phase.
CAPC15	Threat to Archaeological Significance Castle Acre and the surrounding Nar Valley are recognised as areas of exceptionally high archaeological potential, with evidence of Roman, Saxon, medieval, and post- medieval activity. The scale and nature of the proposed development, including extensive ground penetration for panel supports, cabling, access tracks, substations, pylons and BESS infrastructure, presents a substantial risk of harm to currently unidentified archaeological remains. The application does not demonstrate that sufficient archaeological evaluation has been undertaken to allow the full impacts of the development to be properly understood prior to determination, contrary to NPPF Section 16 Paragraph 205. Given the irreversible nature of ground disturbance, reliance on post-consent mitigation would be contrary to national policy and risks the permanent loss of heritage and archaeological assets.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] , supported by ES Appendix 8.3: Archaeological Desk-Based Assessment [APP-153] , ES Appendix 8.4: Geophysical Survey Report [APP-154 to APP-158] , ES Appendix 8.5: Air Photo Services Report [APP-159] and ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160] , present a detailed assessment of the known and potential archaeology within the Site and has assessed the potential impact of the Scheme on archaeological assets, and where required appropriate mitigation has been proposed in ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161] . These archaeological investigations and the mitigation strategy have all been undertaken in consultation with, and with the agreement of, Norfolk County Council Historic Environment Service.
CAPC16	Impact on the River Nar SSSI, Biodiversity and Local Nature Recovery Goals The site lies within the catchment of the River Nar, a chalk stream designated as a Site of Special Scientific Interest (SSSI). Chalk streams are globally rare, with approximately 280 worldwide. The River Nar and Valley have a range of important Biodiversity Action Plan habitats, including chalk stream areas, fens, wet meadows and woodlands, described by the Norfolk Rivers Trust as 'arguably Norfolk's most unspoilt and beautiful example'. The Nar supports an outstanding assemblage of dragonflies as well as the Biodiversity Action Plan mollusc species, Desmoulin's whorl snail, listed as 'endangered'.	A full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in Section 7.7 and 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] .



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CAPC17	As a single, large-scale solar development covering approx. 825 hectares of agricultural land, (without accounting for the immediately adjacent High Grove, RWE proposal) the proposal risks habitat fragmentation, biodiversity loss and displacement of farmland and ground-nesting birds (especially during the construction phase). The bird surveys submitted are 'insufficiently' comprehensive to provide us with confidence that all protected and red-listed species which have previously been recorded on the proposed site and in the surrounding area have been fully identified. Evidence exists of 'Stone-curlew', a rare amber listed species protected under Schedule 1 of the Wildlife and Countryside Act 1981, being recorded with sightings in early October 2026. Stone-curlew are one of the "Breckland SPA qualifying species"; with the close proximity of sites, these birds are potentially part of the SPA population, suggesting the areas are likely to be functionally linked. We suggest further investigation is required.	The Site is located approximately 2.4km from the Breckland SPA designation at its closest point (whilst the closest components relate to Breckland Forest SSSI, which is not understood to provide suitable habitat for Stone Curlew in particular). Further, the Site is located entirely outside of the 1.5km constraint zone identified by Natural England based on the Stone Curlew Planning Tool (SCPT) (Ref: www.breckland.gov.uk/article/20784/Brecks-Special-Protection-Area, accessed September 2025). None of the qualifying species were recorded during any of the specific breeding bird surveys conducted at the Site in 2024, undertaken in accordance with guidance, and therefore the Site does not appear to represent functionally linked land used by qualifying species. Design Principles 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/7.11.1]. New habitat creation will include grassland, scrub, and attenuation features. 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/7.6.1]. This includes, but is not limited to, measures to control noise, light, and pollution. Unsubstantiated sightings of Stone Curlew during October 2025 are unlikely to be of concern, likely representing dispersing individuals outside of the breeding season such that this would be unlikely to be indicative of any significant use or functionally linked land that would alter the conclusions of the submitted information.
CAPC18	Under NPPF Section 15 Paragraphs 187–193, any development with potential to harm SSSIs or irreplaceable habitats must be avoided or rigorously mitigated. As stated, the proposal risks, habitat fragmentation, biodiversity loss, and increased surface runoff, all are contrary to the Environment Act 2021 and emerging Local Nature Recovery Strategies. Climate mitigation cannot be pursued at the expense of adaptation, food security, biodiversity recovery and the protection of irreplaceable natural capital. Recognising that the Parish of Castle Acre is on the development boundary. The CAPC Neighbourhood Plan strongly supports biodiversity enhancement, not degradation.	Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.1], including with specific reference to international, national and locally designated sites of ecological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats (as included within NPPF Section 15 Paragraphs 187-193). Risks considered include those listed in the relevant representation. ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, no adverse likely significant effects are anticipated on any receptors, and as such is in line with NPPF Section 15 Paragraphs 187-193. Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], using the Government metric and associated guidance. This demonstrates that the Scheme will deliver a BNG substantially 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. As set out elsewhere, the Biodiversity Net Gain Assessment Report [APP/7.4.1] has been updated in order to reflect the publication of the Norfolk LNRS and submitted at Deadline 1, in particular reflecting measures in place that will contribute towards the mapped measures identified within the LNRS in line with BNG guidance.
CAPC19	Loss of Best and Most Versatile Agricultural Land (BMV) The proposed site includes land likely classified as Grades 2 and 3a, which fall under the government's definition of Best and Most Versatile (BMV) agricultural land. Under NPPF Section 6 the loss of such land should be avoided unless absolutely necessary. This land plays a vital role in local and national food security, particularly in the context of climate change and rising pressure on domestic food systems. Solar energy generation should be prioritised on brownfield sites, rooftops, or lower-grade land, not productive farmland. Removing this land from agricultural use for decades undermines sustainability objectives which support continued agricultural use and rural character. The development would set a concerning precedent for future loss of BMV land in Norfolk.	The land quality of the Order limits is described in ES Chapter 11: Soils and Agriculture [AS-018] and in ES Appendix 12.2: Flood Risk Assessment [AS-053]. Relevant planning policy is provided in ES Appendix 11.1: Consultation and Legislation, Planning Policy and Guidance [APP-167]. Paragraph 187(b) of the NPPF recognises the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. Paragraph 2.10.21 of NPS EN-3 (2023) recognises the preference for poorer quality land but allows significant weight to be given to the benefits of renewable energy, even where BMV land is affected. The Policy Compliance Document [APP/5.6.1] demonstrates the Scheme's compliance with the NPPF and the relevant NPSs. The implications for food production locally and nationally are considered in Chapter 11. There are no concerns about food security at a global or national level, as described in ES Chapter 11: Soils and



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		Agriculture [AS-018] section 11.8. As set out in the Solar Roadmap, quoted in paragraph 11.8.103, “<i>the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly</i>”. As set out in the Solar Roadmap (DESNZ, June 2025), the Government has ambitious targets for increasing capacity across all groups, seeking 20% domestic rooftop and 15 – 20% commercial rooftop and ground mount in addition to 60 – 65% by large-scale projects. This comes from the text below and Figure 2, page 18, of the Solar Roadmap.
CAPC20	Public Rights of Way & National Trail Impact The Peddars Way (a National Trail) and the Nar Valley Way would be significantly affected by the proposed development impacting the experience of users. The Peddars Way is a nationally designated route of historic, recreational, and tourism importance, following the route of a Roman road and later medieval pilgrimage trail. The introduction of extensive solar infrastructure, fencing, and associated development within its setting would fundamentally alter the character and enjoyment of the trail, conflicting with national planning objectives to promote access to high-quality landscapes and protect valued recreational assets. Refer, NPPF Section 6 “Supporting a prosperous rural economy” of tourist importance.	The management and mitigation measures set out within the oPRoWPPMP [APP-192] will be secured by way of a requirement in the DCO and will ensure that any impact to the PRoW is appropriately mitigated. This will include regular monitoring and review of the local conditions to ensure there are no adverse effects from additional recreational or visitor demand. In the event there are adverse effects, suitable mitigation will be implemented such as remediation measures to restore any habitats or in the worst-case scenario the provision of alternative PRoW routes in the event any of the designated routes need a break from recreational pressure. Any potential landscape and visual effects are detailed within ES Chapter 6: Landscape and Visual [AS-016], which outlines potential landscape and visual effects upon users of the Nar Valley Way and Peddars Way and Norfolk Coast Path, as a result of the Scheme. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon landscape and visual receptors are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area upon users of the Nar Valley Way and Peddars Way and Norfolk Coast Path. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.
CAPC21	Impact on Dark Skies Policies Castle Acre Parish Council has adopted a Dark Skies Policy in line with national and county guidance. NPPF Section 15 Paragraph 198 and Norfolk County Councils Environmental Lighting Zones Policy. The impact of operational and security lighting from the proposed solar farm, regardless of mitigation, is an additional concern, adversely affecting the quality of our night skies and their value to nocturnal wildlife.	Regarding operational lighting the Scheme would not conflict with NPPF Para 198 (c) or the Dark Sky Policy in Castle Acre's Neighbourhood Plan (adopted 2022) - Policy NE.4 Dark Skies. The Scheme limits light spillage and eliminates all unnecessary forms of artificial outdoor lighting, as defined within the oOEMP [APP/7.8.1]. 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 explained in oOEMP [APP/7.8.1] and ES Chapter 5: The Scheme [APP/6.1.2]. Lighting is not required within the Solar PV Site during the operation phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. Temporary Site lighting would be used during construction to enable safe working during construction in hours of darkness or where natural lighting is unable to reach (such as sheltered/confined areas). Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the construction compounds while construction is underway. The Design Principles, Parameters and Commitments [APP/5.8.1] confirms that “<i>The Solar arrays will not be lit during the operational phase</i>”, such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the site, whilst measures to control lighting and prevent adverse effects (including secured by Requirement 13 of the draft DCO [APP/3.1.1]) are set out within the oCEMP [APP/7.6.1]. The key features identified to support bat commuting and foraging within the site are the hedgerows and woodland edges. The Customer Substation, National Grid Substation, and BESS will be located internally within fields and will not affect boundary features, including no significant light spill onto boundary features,



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		and as such features of importance for bats will remain unaffected and connectivity maintained within the landscape.
CAPC22	Noise Pollution Though we recognise that the solar panels themselves do not emit noise, the infrastructure surrounding the solar farm (once built) will generate operational noise, particularly the sub-station and the battery storage, inverters and fans. During the construction period, noise generated by piling for the panel supports, the installation of associated infrastructure and from construction traffic on local roads in this rural and tranquil landscape will all be intrusive, constantly affecting the quality of life for residents and all those using the Public Rights of Way and Footpaths on or near the solar installations as well as being damaging to local wildlife. The application does not adequately assess the cumulative impacts of construction traffic on highway safety, residential amenity, tourism activity, and the tranquil character of the area, particularly during peak visitor seasons. NPPF Section 15 Paragraph 198 refers.	The noise assessment presented in ES Chapter 10: Noise and Vibration [APP-059] and Technical Appendix 10.3: Construction and Noise Modelling [APP-166] considers the tranquil character of the area (demonstrated by the low background levels measured in the baseline survey). This is accounted for by adopting appropriate background and absolute level criteria for the assessment which is also based on worst-case predictions and assumptions and concludes non-significant effects. The assessment also considers noise effects on PRow during construction (expected to be temporary effects) and operation phases. Mitigation measures have been outlined for the Solar Conversion Units (CUs) and BESS to mitigate the operational noise effects on PRow to comply with the appropriate criterion. Residual effects are determined to be not significant with the implementation of the outlined mitigation, which have been included in the oOEMP [APP/7.8.1] will be detailed in the detailed Operational Environmental Management Plan and secured as a DCO requirement.
CAPC23	Cumulative Impact and Policy Precedent with more than 3,800 hectares of solar developments proposed across Norfolk, (including the neighbouring High Grove proposal) The cumulative impact on landscape character, biodiversity, and heritage must be assessed at a strategic level, considering the legal requirements to: • Protect designated and non-designated heritage assets and their setting. • Conserve ecological networks and sensitive habitats. • Avoid inappropriate development in open countryside and rural landscapes. We believe the application does not sufficiently evaluate cumulative and sequential changes within the Nar Valley, and the associated impacts appear to have been underestimated.	The assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations³ and the Planning Inspectorate's advice note on Cumulative Effects Assessment⁴. The approach to cumulative assessment is detailed in ES Chapter 2: EIA Process and Methodology [APP-051] and ES Appendix 2.4: Cumulative Schemes [APP-136]. The cumulative assessments within each of the technical topic chapters have been undertaken in accordance with the relevant topic specific guidance and best practice approach, assessing a reasonable worst-case scenario. Cumulative impact on landscape character, biodiversity, and heritage has been assessed, as required, in ES Chapter 6: Landscape and Visual [AS-016], ES Chapter 7: Ecology and Biodiversity [APP/6.2.1], and ES Chapter 8: Cultural Heritage and Archaeology [APP-057], respectively. Nar Valley and sensitive receptors within the Nar Valley have been identified and assessed as part of the cumulative effects assessment in ES Chapter 6: Landscape and Visual [AS-016] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The cumulative effects assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area upon users of the Nar Valley Way and Peddars Way and Norfolk Coast Path. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA E6 North Pickenham Plateau. There are no significant cumulative effects concluded on any heritage receptors.
CAPC24	In conclusion, Castle Acre Parish Council concludes that the Drovers Solar Farm proposal (alongside that of the High Grove Solar Farms) would result in significant and enduring harm to the local landscape character, the historic villages of Castle Acre and South Acre and their heritage assets, archaeological resource, biodiversity and protected species, BMV agricultural land, and public enjoyment of the Nar Valley and its nationally important heritage setting.	Significant effects have been identified to areas of landscape within the Site; however, this is limited to the landscape within the Site itself, and the landscape outside of the Site is not considered to experience a significant effect, as detailed in ES Chapter 6: Landscape and Visual [AS-016]. No significant effects have been identified on the historic villages of Castle Acre and South Acre and their heritage assets or archaeological resource, as detailed in ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. No significant adverse effects have been identified on biodiversity and protected species, as presented in ES Chapter 7: Ecology and Biodiversity [APP/6.2.1]. However, significant beneficial effects have been identified on breeding bird, wintering birds, habitats, and amphibians during the operational phase.

³ HM Government, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

⁴ Planning Inspectorate, Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (September 2024)



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		Impacts on BMV land have been assessed in ES Chapter 11: Soils and Agriculture [AS-018], which identifies no significant effects as a result of the Scheme in isolation; however, a significant effect on BMV land is identified through the cumulative effects assessment, as a result of the cumulative permanent loss of BMV land as a result of the Scheme and other identified cumulative schemes (including High Grove Solar). This is as a result of the direct loss of more than 20ha of BMV land across all developments considered in the cumulative effects assessment; in real terms this represents a fractional loss of total BMV land permanently lost as a result of the cumulative developments. Nar Valley and sensitive receptors within the Nar Valley have been identified and assessed in ES Chapter 6: Landscape and Visual [AS-016] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057], with no significant effects concluded. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area including Nar Valley and sensitive receptors within the Nar Valley. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. No significant heritage effects have been identified on any receptors.
CAPC25	'The Drovers Solar Farm' proposal is incompatible with Castle Acre & South Acre's heritage status, ecological importance, and community-led planning objectives. It represents a form of unsustainable industrial development that would cause long-term, some irreversible and unjustified harm to an irreplaceable historic and natural environment. While national policy supports renewable energy development, that support is explicitly conditional upon the avoidance or clear justification of harm to designated heritage assets and their setting, best and most versatile agricultural land, valued landscapes, ecological networks, and rural amenity. In this case, the application fails to demonstrate that such harm has been adequately avoided, minimised, or convincingly justified. The application relies on generic national need for renewable energy but fails to demonstrate why this particularly sensitive site, within an exceptional heritage and ecological landscape, is necessary to meet that need. No evidence is provided that equivalent or greater generating capacity could not be delivered through less harmful alternatives, including brownfield land, lower-grade agricultural land, rooftop solar, or dispersed schemes. In the absence of such evidence, the public benefits claimed are generic rather than site-specific and cannot outweigh the identified heritage, landscape, ecological and agricultural harm.	The Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors, including consideration of designated international and national ecological and geological sites, nationally designated landscapes, ancient woodland, flooding and heritage and archaeological. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] and [APP-053] Appendix 1 Site Evaluation Report explains the methodology that has been applied when identifying and evaluating potential sites for the Scheme. The Planning Statement [APP/5.5.1] sets out the rigorous process that the Applicant undertook to select the Site including the consideration of environmental constraints. Appendix 1 of the Planning Statement [APP/5.5.1] contains the Site Evaluation Report, which details the process followed in selecting the site location, including agricultural land classification (ALC) considerations that fed into this process. Paragraph 4.4.19 - 4.4.22 details the ALC considerations that fed into the site selection process. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] confirms that the Applicant has considered whether sufficient previously developed land (including available previously developed industrial land) would be available to develop a utility-scale solar development. The search of Breckland Council and the Borough Council of King's Lynn & West Norfolk's brownfield registers confirmed that none of the brownfield sites would have the capability of meeting the project objectives, largely due to the size of the sites. The ES, submitted as part of the DCO Application, considers the likely significant effects of the Scheme on the environment, including effects on heritage, ecology and the wider community. With specific regard to effects on heritage, ES Chapter 8: Cultural Heritage and Archaeology [APP-057] presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein along with potential impacts of the Scheme upon the historic environment. The Chapter sets out that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, and that all residual adverse effects constitute 'less than substantial harm'. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] outlines that 'substantial harm' is afforded to any adverse effect that is of a major magnitude, whilst moderate, minor or negligible adverse effects represent effects that are of 'less than substantial harm' in nature. With specific regards to effects to ecology, ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] confirms that no significant adverse effects are anticipated at national or local nature conservation sites, protected species, habitats and other species. ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] explains that



Reference number	Representation	Applicant response
		veteran trees are considered irreplaceable habitats, the retention of these trees has been designed into the Scheme, and these features will be protected throughout the lifetime of the Scheme. Having regard to all important and relevant matters, the Applicant concludes in the Planning Statement [APP/5.5.1] that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1 (2023). With regard to the national policy point, as set out in the NPPF and supported paragraph 4.2.8 and 4.2.18 of NPS EN-1 (2023) and paragraphs 4.2.21 and 4.2.28 NPS EN-1 (2025), renewable energy development is supported in principle but requires that any harm to heritage assets, best and most versatile agricultural land, valued landscapes, ecological networks, and rural amenity must be avoided or clearly justified. The Policy Compliance Document [APP/5.6.1] demonstrates the Scheme's compliance with the relevant NPSs and the NPPF. The Planning Statement [APP/5.5.1] under Section 9 confirms that the CNP presumption applies to the Scheme. As summarised in the Planning Statement [APP/5.5.1], there are no residual impacts as a result of the Scheme which would outweigh the need, nor are there any residual impacts which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats, the achievement of net zero, offshore navigation, flood and coastal erosion. As explained within the Planning Statement [APP/5.5.1], any harm caused by the Scheme is outweighed by the substantial benefits that are delivered. It is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted. Potential effects upon 'valued landscapes' and their presence within the context of the Site are addressed within ES Chapter 6: Landscape and Visual [AS-016], which outlines potential landscape and visual impacts as a result of the Scheme. This is supported by ES Appendix 6.5: Evaluation of Landscape Value [APP-143] which assessed that the Site and immediate context based on Landscape Institute Technical Guidance Note TGN 02-21 "Assessing Landscape Value Outside National Designations", 2021. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1].
CAPC26	In particular, the proposal fails to: • Demonstrate that reasonable alternatives, including less harmful locations for key infrastructure, have been properly assessed. • Provide sufficient evidence that the harm to identified heritage assets, their setting, and the wider cultural landscape of the Nar Valley are clearly outweighed by public benefits, as required by NPPF Paragraphs 199–202. • Adequately assess cumulative impacts within the Nar Valley and the wider context of extensive existing and proposed energy infrastructure. • Provide sufficient certainty that archaeological and ecological assets would not be irreversibly harmed.	The Design Approach Document [AS-009] provides an overview of the design framework and demonstrates how good design aspirations and intentions have cascaded through the Scheme and will be secured as good design outcomes within the detailed design of the Scheme. Sections 6 and 7 of the Design Approach Document [AS-009] explain how the design principles have been applied in the design evolution of the Scheme. In order to facilitate a connection into the existing overhead lines, the Scheme requires alterations to made to existing infrastructure. The Applicant therefore made a decision to co-locate the Customer Substation and National Grid Substation with the BESS to prevent environmental impacts extending across a wider area, either by extending overhead line diversions or dispersing the larger elements of the Scheme across a wider geographical areas within the Site. Following consultation feedback, the design was amended to reduce impacts of the Customer Substation and National Grid Substation infrastructure on landscape receptors and heritage assets to the north of the Site along the Nar Valley. The siting zones for the National Grid Substation, Customer Substation and BESS were removed from fields to the north of Batholomew's Hills Plantation and located to the south of the plantation. The siting zones for the National Grid Substation and the Customer Substation were restricted to Field 27 only, and the siting zone for BESS restricted to part of Field 27 and part of Field 24. With the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1 (2023).



Reference number	Representation	Applicant response
		In addition to the Design Approach Document [AS-009], ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] has demonstrated the process undertaken in investigating and assessing reasonable alternative locations for the National Grid Substation, Customer Substation, BESS, and Grid Connection Infrastructure. The stages of design and consultation are detailed, with specific design changes and rationale presented in the tables within the chapter. The location of 'key infrastructure', as referred to in the Relevant Representation, has been arrived at in consideration of the environmental constraints presented in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053]. Nar Valley and sensitive receptors within the Nar Valley have been identified and assessed in ES Chapter 6: Landscape and Visual [AS-016] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057], for the Scheme in isolation, and as part of the cumulative effects assessment within considers existing and proposed energy infrastructure (including High Grove Solar). During the construction and decommissioning phases, temporary significant effects have been identified on VRG3: Nar Valley Southern Slope and Settlement Edge of South Acre. VRG3 has also been assessed as experiencing a significant effect during the operational phase in the short term only, with the proposed mitigation planting soon screening the views once at an established height. No medium or long term significant effects have been identified on Nar Valley and sensitive receptors within the Nar Valley. This demonstrates accordance with NPPF Paragraphs 199–202. Effects to archaeological and ecological receptors have been assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057], with no significant effects concluded. Based on the conclusions of these chapters, certainty is provided that archaeological and ecological assets would not be irreversibly harmed.
CAPC27	For these reasons, Castle Acre Parish Council concludes that the proposal represents unsustainable development that conflicts with national policy, the local development plan, and the Castle Acre Neighbourhood Plan. We therefore strongly urge the Examining Authority and the Secretary of State to refuse consent for the Drovers Solar Farm.	The Applicant notes this comment and would refer to the above responses which address the points set out in this response in more detail.



2.6 RR-026, Holme Hale Parish Council

Reference number	Representation	Applicant response
HHPC1	Holme Hale Parish Council are concerned about the cumulative development of solar farms, particularly in relation to the impact on the local area with regard to taking agricultural land out of production and also the likely impact on amenity and tourism in the locality. This, in turn, negatively impacts the revenue generated in the local area.	As part of the DCO Application, the Applicant has undertaken an assessment of likely cumulative effects, provided in each of the ES Topic Chapters and summarised in ES Chapter 18: Summary of Effects [APP-067]. Overall, ES Chapter 11: Soils and Agriculture [AS-018] concludes that, with embedded and additional mitigation measures in place, the Scheme would not result in any significant adverse effects on soil or agricultural land resources throughout its lifecycle. A worst-case cumulative assessment has been applied which identifies that there is the potential for permanent land loss of BMV quality from all the developments to exceed 20ha, which would result in a cumulative impact of a moderate adverse effect, which would be significant in EIA terms. As stated above, this effect should, however, be considered in context. The estimated areas of agricultural land from the provisional ALC maps in Norfolk (479,000ha) and Breckland (107,000ha) are set out in Chapter 11 in Table 11-8 of section 11.8. As set out in section 11.11, taking the average utilised agricultural area figures for the UK and applying that to Norfolk, then 335,000ha are farmed. The cumulative area involved with The Drovers, East Pye and High Grove amounts to about 1% of farmed land in the county. The effects on food production regionally and nationally are negligible, as set out in section 11.11. ES Chapter 14: Socio-Economics [APP-063] 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, operation and decommissioning phases. Section 14.11 of that Chapter concludes that there will be a major beneficial cumulative effect on the provision of education, skills, training and supply chain as a result of the Scheme's, High Grove Solar's and East Pye Solar's construction, operational and decommissioning phases. In order to mitigate potential cumulative impacts, the Applicant has collaborated with the High Grove Solar Farm team during the pre-application stage and has included measures within the oLEMP [APP/7.11.1] and oCTMP [APP/7.7.1] to inform the detailed design and manage potential cumulative effects. The Planning Statement [APP/5.5.1] concludes that the cumulative impacts of renewable energy development in the area do not present unacceptable impacts.
HHPC2	We also request that Holme Hale Parish Council continues to be included within the consultation process.	The Applicant notes this comment and confirms that they will continue to engage with Holme Hale Parish Council.



2.7 AS-061, Barbergh and Mid Suffolk Council

Reference number	Representation	Applicant response
MSDC1	MSDC acknowledges the national importance of renewable energy generation, however, due to the considerable number of Nationally Significant Infrastructure Projects (NSIPs) and other major renewable schemes in the region, the Council must ensure that cumulative impacts are appropriately assessed, mitigated, and coordinated.	The Applicant is aware of the other NSIP projects in the region. It has undertaken an assessment of likely cumulative effects provided in each of the ES Topic Chapters [AS-016 to APP-064] and summarised in ES Chapter 18: Summary of Effects [APP-067] .
MSDC2	Principle of Development The council acknowledges the contribution the scheme would make to increasing renewable energy generation, required to meet net zero targets. The Council must balance the urgent need for decarbonisation with its responsibility to protect the character, wellbeing, and long-term interests of Mid Suffolk's communities, environment, heritage assets, agricultural land, and local economy. The district's rural character, historic landscape, and pattern of small settlements are particularly sensitive to large-scale development, and the potential harms arising from the cumulative burden of numerous simultaneous NSIPs in the region are of significant concern.	The Applicant has applied the planning balance in the Planning Statement [APP/5.5.1] and considers that the identified substantial benefits of the Scheme outweigh the residual harms that would arise. Further, the CNP presumption means that these residual impacts are outweighed by the urgent need for the Scheme.
MSDC3	For these reasons, the Council is clear that large-scale renewable development must be strategically planned, appropriately sited, and fully coordinated with other regional NSIPs. The approach must also be supported by robust evidence demonstrating that adverse impacts have been minimised and effectively mitigated. At present, the volume of energy generation, storage and transmission proposals coming forward across the eastern region including several within and around Mid Suffolk, makes a strategic, coordinated approach essential. Without such coordination, there is a real risk of disproportionate and avoidable cumulative effects on local communities, rural settlements, heritage landscapes, biodiversity, local businesses, the agricultural economy, the highway network, construction logistics, and the capacity of the local housing and tourism sectors to absorb temporary workforces.	The Applicant is aware of other projects in the region. Each of the ES Topic Chapters and ES Chapter 18: Summary of Effects [APP-067] consider the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Statement of Need [APP-042] and Planning Statement [APP/5.5.1], 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. As set out in the Consultation Report [APP-025], the Applicant is in regular engagement with RWE, on behalf of High Grove Solar. This engagement included collaboration during the pre-application stage and has resulted in the inclusion of measures within the oLEMP [APP/7.11.1] and oCTMP [APP/7.7.1] to inform the detailed design and manage potential cumulative effects.
MSDC4	While the Council remains open to supporting well-designed renewable energy schemes, acceptance depends on the applicant demonstrating that environmental and heritage impacts have been fully and transparently assessed, that cumulative impacts have been modelled realistically, and that proposed mitigation is deliverable, enforceable and secured. The Council also expects developers to show how their proposals will integrate with a wider, coordinated approach to infrastructure delivery in the region rather than contributing to piecemeal pressure on sensitive landscapes and communities. This position reflects the Council's commitment to both climate action and the long-term protection of Mid Suffolk's communities and landscapes.	The Planning Inspectorate has published guidance entitled 'NSIPs: Advice on Good Design'. This guidance highlights that the Governments in England and Wales recognise that good design is a process that needs to include the social, environmental and economic aspects of a development, including its construction, operation and management, and its relationships to its surroundings. Ultimately, good design is the result of a wide range of factors and considerations that seek to deliver functionality, durability and aesthetic appeal. The Design Approach Document [AS-009] provides an overview of the design framework and demonstrates how good design aspirations and intentions have cascaded through the Scheme and how the outcomes of the design process and mitigation measures will be secured within the detailed design, construction, operation and decommissioning phases of the Scheme. Sections 6 and 7 of the Design Approach Document [AS-009] explain how the design principles have informed the design decisions throughout the design process. Further to this the Applicant has set out within Appendix A of the Design Approach Document [AS-009], how each stage of the design process as identified within the NSIPs: Advice on Good Design (Planning Inspectorate, April 2025) has been considered. Environmental and heritage impacts have been assessed within each of the technical topics of the ES, including the undertaking of a cumulative assessment in accordance with the required regulations, advice, and best practice, with any significant effects identified presented in ES Chapter 18: Summary of Effects [APP-



Reference number	Representation	Applicant response
		067 . Each technical chapter has identified where mitigation is required to reduce the scale of any potential effects identified, as well as how this mitigation will be secured.
MSDC5	Transport and Construction Logistics Port of Entry and Freight Routing MSDC notes that the Applicant has not confirmed the intended port of entry for the delivery of major components. This lack of certainty limits the robustness of any construction traffic modelling and prevents a complete understanding of transport impacts. The Council therefore requests: • Confirmation of the specific port(s) to be used. • A complete end-to-end freight routing strategy, including movements from port to site. • Details of AIL routing which should avoid the A140 at Brockford, necessitating overbridging and resulting in significant disruption for this part of Mid Suffolk. • Evidence that the A14, A140, and local distributor roads within Mid Suffolk can accommodate the cumulative pressures from regional NSIPs during overlapping construction periods	The information provided within ES Chapter 9: Transport and Access [APP/6.2.1] provides a robust assessment of the transport impacts, concluding that the effects of the scheme would not be significant. Due to commercial uncertainty on the materials associated with the Scheme, at this stage it is not possible to fix the port of entry into the UK for materials. However, the routing for HGVs is detailed within the oCTMP [APP/7.7.1], that is proposed to be secured by way of a requirement in the DCO, which confirms that the majority of HGVs will arrive via the Strategic Road Network (SRN) in the form of the A47 and via the A1065 to access the Scheme, so the routing is secured despite the port of arrival not being known. Subject to the materials being delivered, there may be a nominal amount of HGV traffic which arrives from the north via the A1065, however in the event it arrives from this direction it would likely access via the A148, so would not be using any local roads relevant to Mid Suffolk District Council (MSDC). Mitigation is secured through the oCTMP [APP/7.7.1] to ensure that the impacts remain non-significant, as well as monitoring and enforcement protocols to ensure the mitigation is sufficient. The updated oCTMP [APP/7.7.1] includes reference to liaison with the relevant highway authorities and other cumulative sites to ensure that the associated impacts of any abnormal load deliveries or construction deliveries are appropriately considered and planned with relation to another cumulative schemes or works on the road network, which would mitigate against any uncertainty on the port of arrival for deliveries once this information is known. Within the detailed Construction Traffic Management Plan that is secured by a requirement of the DCO and provided prior to commencement, more details will be available on the relevant port of arrival. All construction vehicles will utilise the SRN to avoid impacts to local roads, as secured in the oCTMP [APP/7.7.1]. The details on the port for any AIL arrivals again cannot be confirmed at this stage, though it is anticipated that the contractor will work with National Highways to agree an appropriate route that is designated for abnormal loads through the ESDAL. The comments regarding avoiding the A140 are noted and it will be ensured that the routing for AIL deliveries avoids this constraint. This is secured through the updated oCTMP [APP/7.7.1] and the detailed Construction Traffic Management Plan secured by way of requirement. In the event there is any overlap from regional NSIP schemes, there will be collaboration within the forthcoming cumulative sites, as detailed within Section 5.15 of the oCTMP [APP/7.7.1] that is to be secured by a requirement in the DCO, to ensure opportunities are taken between developers to minimise overlaps between HGV deliveries and so that construction peaks are planned into the programme accordingly so cumulative effects are mitigated appropriately on the A14, A140 and any other roads within Mid Suffolk.
MSDC6	Cumulative Transport Impacts Mid Suffolk is within a region seeing the delivery of multiple concurrent infrastructure schemes. Together, these may generate significant cumulative construction traffic pressures. MSDC seeks: • A revised cumulative transport assessment using realistic build-out assumptions for other interrelated NSIPs and large-scale developments. • Clear identification of pinch points, peak construction overlaps, resulting impacts and adequate mitigation.	A revised cumulative assessment is not considered to be required given the predicted impact of the Scheme on roads relevant to Mid Suffolk. A proportionate assessment of the cumulative transport effects of the Scheme is considered within section 9.11 of ES Chapter 9: Transport and Access [APP/6.2.1], which concludes there are unlikely to be any significant cumulative effects. It is unlikely that LGV or staff deliveries associated with the Scheme would originate from Mid Suffolk, so it would only be in the event that deliveries are into Felixstowe Port. Even in the unlikely, worst-case scenario that all HGV trips each day arrive into Felixstowe Port, it is possible to identify the percentage uplift that the Scheme may result in using the Department for Transport (DfT) static counts for the A14 and A140, which identify a daily vehicle flow of circa 42,585 for the A14 and 20,867 for the A140 respectively. The additional construction traffic from the Scheme would equate to less than a 0.2% uplift on the A14 and a 0.5% uplift on the A140, which fall well within the parameters identified in IEMA EATM Guidance (2023) referred to in ES Appendix 9.1: Consultation and Legislation, Planning Policy and Guidance [APP-162], of typical daily traffic fluctuation at 10% or the 60% uplift threshold



Reference number	Representation	Applicant response
	A robust Construction Traffic Management Plan (CTMP) that includes enforceable conditions and cross-project coordination.	above which significant effects may occur. As the impact of the Scheme is significantly below these thresholds, it is not considered that further assessment is required. The pinch points, network constraints, construction overlaps, impacts and mitigation proportionate and relevant to the impacts of the scheme are already considered appropriately via the assessments in ES Chapter 9: Transport and Access [APP/6.2.1] and ES Appendix 9.2: Traffic Assessment [APP-163], which concludes there are no significant effects or severe impacts, with mitigation secured via the oCTMP [APP/7.7.1]. As detailed within Section 5.15 of the oCTMP [APP/7.7.1] that is to be secured by a requirement in the DCO, there will be a commitment to collaboration with the forthcoming regional NSIP sites, to ensure opportunities are incorporated that minimise overlaps between HGV deliveries, identify opportunities to work together to reduce construction materials needed and ensure that construction peaks are planned into the programme accordingly so cumulative effects are mitigated. A robust oCTMP [APP/7.7.1] has been prepared which is proposed to be secured by a requirement in the DCO which will include enforceable requirements and monitoring obligations, as well as allowances for cross-project response. Mid Suffolk will be included within regular communications of the detailed Construction Traffic Management Plan by the contractor to allow further coordination and ensure any cross-project effects are appropriately considered.
MSDC7	Workforce Accommodation and Socio-Economic Effects Labour Catchment Area Pressures Mid Suffolk sits within the wider Labour Catchment Area for several major NSIPs and large-scale development projects. MSDC remains concerned about the potential cumulative demand for temporary accommodation, with associated risks including: - Pressure on tourism accommodation stock; - Competition for private rental properties, potentially restricting access for local households; - Increased affordability challenges for Mid Suffolk residents; and - Appropriate and effective social integration of temporary workforce populations. MSDC therefore requests: - A fully detailed breakdown of workforce size, duration, and accommodation needs; - A cumulative assessment of impacts on the tourism and private rental sectors; - Appropriate mitigation measures, including coordination with other developments, consideration of temporary accommodation solutions and appropriate management of social integration issues.	The Applicant does not intend to respond to MSDC's request for information as the Applicant believes sufficient information on these matters is already contained within the DCO Application. A summary of the key information related to MSDC's request is set out below. <i>Breakdown of workforce size, duration, and accommodation needs</i> Paragraph 14.8.5 of Section 14.8 of ES Chapter 14: Socio-Economics [APP-063] states that taking the net direct and net indirect jobs together, the Scheme is expected to support 1,145 net additional jobs during the construction phase (approx. 2 years). Of these, between 285 and 575 are expected to be taken by residents of the LCA over the construction period, equivalent to approximately 155 to 310 jobs per annum. ES Chapter 14: Socio-Economics [APP-063] presents the findings of assessment and availability of temporary accommodation for construction workers and tests different scenarios across varying travel times (see paragraph 14.6.29 of ES Chapter 14: Socio-Economics [APP-063]). To ensure robustness, the analysis (see Section 14.8 of ES Chapter 14: Socio-Economics [APP-063]) first considered the wider labour catchment area, reflecting the full geography from which workers could realistically travel. The baseline data identifies an estimated 9,600 available and affordable bed spaces within the LCA. On this basis, even in a worst-case scenario where all construction workers require temporary accommodation, the Scheme would require only a small proportion of the remaining available stock. The assessment applies a number of conservative assumptions, including in relation to the proportion of non-LCA workers, the area of impact, accommodation occupancy rates, and peak workforce size, and concludes that there is sufficient capacity within the temporary accommodation market. As such, the effect of the Scheme on temporary accommodation is assessed as not significant in EIA terms. <i>Effect on private rental sector</i> Private rented accommodation was not included within this assessment because the assessment focused on the temporary accommodation market likely to be used by the Scheme's construction workforce, rather than longer-term housing stock. This reflects the temporary and mobile nature of construction employment, with workers expected either to commute from within the labour catchment area or, where overnight stays are required, to rely primarily on short-term accommodation options rather than relocate into the private rented sector on a longer-term basis. On that basis, the assessment considered the temporary accommodation market to be the most relevant receptor for identifying likely significant effects and hence it is not likely that the Scheme's construction workers would be staying in the private rented sector.



Reference number	Representation	Applicant response
		<i>Cumulative effect of temporary worker accommodation</i> The Applicant also notes this comment in relation to cumulative effects. The cumulative assessment of temporary worker accommodation, presented in Section 14.11 of ES Chapter 14: Socio-Economics [APP-063], concludes that High Grove Solar Scheme and East Pye Solar Farm are not likely to overlap with the Scheme's construction phase and that, even at the Scheme's peak construction workforce of 740 workers, sufficient accommodation capacity would remain available within the LCA. The cumulative effect is therefore assessed as not significant in EIA terms. <i>Appropriate mitigation measures for temporary worker accommodation</i> As no significant adverse effects have been identified for temporary accommodation, no additional mitigation measures for the Scheme are required. However, as outlined in the oCEMP [APP/7.6.1] support will be given to construction workers to find suitable accommodation.
MSDC8	Cross-Project Coordination Given the extraordinary scale of infrastructure delivery across Suffolk and the wider region, MSDC emphasises the need for early coordination between developers, local authorities, and agencies involved in other NSIPs and large-scale developments to manage cumulative accommodation and labour market pressures effectively.	The Applicant acknowledges the need for early coordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to coordinate with other projects and relevant stakeholders in order to understand and, where possible, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The oCEMP [APP/7.6.1] has been updated at Deadline 1 in accordance with this.
MSDC9	Adequacy of the Cumulative Impact Assessment MSDC continues to have concerns regarding the adequacy and methodological robustness of the cumulative impact assessment (CIA). In particular, the CIA must: • Incorporate up-to-date construction programmes from all relevant NSIPs and large-scale developments; • Provide transparent assumptions regarding construction period overlaps; • Demonstrate that cumulative traffic, accommodation, environmental, and socio-economic impacts have been assessed consistently and comprehensively; and • Assign responsibility for delivering mitigation where cumulative effects are significant.	ES Appendix 2.4: Cumulative Schemes [APP-136] presents the schemes considered for assessment as part of the cumulative effects assessment within the ES. Table 2-3 of this appendix contains the details of the selected schemes, which was informed by a review of the latest available construction programme information for all relevant NSIPs and large-scale developments. Based on the construction programme information, a judgement was made as to whether there was likely to be an overlap of construction phase impacts, as is indicated in Table 2-3. The Applicant will continue to review the status and details of the cumulative schemes throughout the Examination. The Applicant would welcome specific feedback, if MSDC is aware of any updates. The assessment of cumulative traffic impacts is presented in Section 9.11 of ES Chapter 9: Transport and Access [APP/6.2.1], which has concluded no significant cumulative effects socio-economic impacts, including effects related to accommodation, have been assessed in Section 14.11 of ES Chapter 14: Socio-Economics [APP-063], which concludes that there are no significant cumulative effects, including in relation to changes in demand for temporary accommodation. The responsibility for delivering mitigation is signposted within the Commitments Register [APP-180], which details each of the mitigation measures committed to in the ES, where this mitigation is secured, and who is responsible for delivering the mitigation. The mitigation measures have been identified as a result of the assessment processes within the ES, including the assessment of cumulative effects.
MSDC10	Conclusion Mid Suffolk District Council supports the transition to renewable energy but considers that several matters must be clarified or mitigated before the project can be considered acceptable. These include: • Transport routing and cumulative network impacts; • Workforce accommodation pressures; • Adequacy of the cumulative impact assessment.	The assessment of cumulative traffic impacts and of the proposed transport routing is presented in ES Chapter 9: Transport and Access [APP/6.2.1], which has concluded no significant cumulative effects. The routing for HGVs is detailed within the oCTMP [APP/7.7.1], that is proposed to be secured by way of a requirement in the DCO, which confirms that the majority of HGVs will arrive via the SRN in the form of the A47 and via the A1065 to access the Scheme. Workforce accommodation pressures have been assessed, both for the Scheme in isolation and cumulatively, in ES Chapter 14: Socio-Economics [APP-063], concluding no significant effects.



Reference number	Representation	Applicant response
	MSDC respectfully requests that the Examining Authority explores these matters fully during the Examination and reserves the right to provide further detailed submissions as the process progresses.	The assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations ⁵ and the Planning Inspectorate's advice note on Cumulative Effects Assessment ⁶ . The approach to cumulative assessment is detailed in ES Chapter 2: EIA Process and Methodology [APP-051] and ES Appendix 2.4: Cumulative Schemes [APP-136] . The cumulative assessments within each of the technical topic chapters have been undertaken in accordance with the relevant topic specific guidance and best practice approach, assessing a reasonable worst-case scenario.

⁵ HM Government, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
⁶ Planning Inspectorate, Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (September 2024)



3 Prescribed Bodies

3.1 RR-022, Forestry Commission

Reference number	Representation	Applicant response
FOR1	Thank you for consulting the Forestry Commission on this proposal. As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland. There are no ancient woodlands within the order limits or the immediate surrounding area. There are several mixed deciduous woodlands adjacent to and surrounded by the site, plus we note that 39 veteran trees have been identified.	The Applicant notes this comment.
FOR2	Ancient and Veteran Trees: Ancient and veteran trees are irreplaceable habitats. Section 5.4.55 of EN1 – The Overarching National Policy Statement for Energy (2025) states: “The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.”	The Applicant has had regard to NPS EN-1 paragraph 5.4.32 (2025) (and paragraph 5.4.53 of NPS EN-1 (2023)), and the Scheme's approach to ancient and veteran trees is set out in ES Appendix 16.4: Arboricultural Impact Assessment [APP-178], with embedded mitigation secured through the oCEMP [APP/7.6.1], oLEMP [APP/7.11.1] and Design Principles, Parameters and Commitments [APP/5.8.1]. The buffer zones and mitigation measures accord with the Natural England and Forestry Commission Standing Advice (Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (2022)), and Natural England confirmed in its Relevant Representation (Applicant's Response to Relevant Representations [APP/8.4]) that it had no 'amber' or 'red' issues in this regard. Table 1 of the Policy Compliance Document [APP/5.6.1] provides assessment of the Scheme's compliance with paragraph 5.4.55 of NPS EN-1. It is concluded that, with the appropriate mitigation and monitoring measures in place across the construction, operation and decommissioning phases, the Scheme is compliant with this policy.
FOR3	We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and “Keepers of Time” – Ancient and Native Woodland and Trees Policy in England. The Joint NE/FC Standing Advice states that for or ancient or veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. Due to the irreplaceable nature of ancient and veteran trees, most temporary effects will result in irreplaceable damage. The application states that veteran trees will not be removed under any circumstances, and that protection measures including fencing and dust control measures will be utilized, we note that some construction traffic will utilize existing access tracks that are in the RPA's of some of the trees. An increase in traffic, particularly heavy construction traffic could lead to habitat degradation. Any effect	The Applicant has had regard to NPS EN-1 paragraph 5.4.32, and the Scheme's approach to ancient and veteran trees is set out in ES Appendix 16.4: Arboricultural Impact Assessment [APP-178], with embedded mitigation secured through the oCEMP [APP/7.6.1], oLEMP [APP/7.11.1] and Design Principles, Parameters and Commitments [APP/5.8.1]. The buffer zones and mitigation measures accord with the Natural England and Forestry Commission Standing Advice (Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (2022)), and Natural England confirmed in its Relevant Representation (Applicant's Response to Relevant Representations [APP/8.4]) that it had no 'amber' or 'red' issues in this regard. The existing tracks proposed for use within the Scheme pass through Root Protection Areas and veteran tree buffers in several locations. These tracks are currently used by a range of heavy machinery and HGVs and will remain accessible for agricultural and other associated activities throughout the lifetime of the Scheme, as set out in the Design Principles, Parameters and Commitments [APP/5.8.1]. No additional impact resulting from construction traffic is therefore anticipated in these areas. ES Appendix 16.4: Arboricultural Impact Assessment [APP-178] provides indicative details of tree protection measures to be adopted where necessary, including ground protection, no-dig construction and arboricultural supervision. As set out above, the principal interaction between construction traffic and



Reference number	Representation	Applicant response
	from the incursion into RPA's of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction.	veteran tree RPAs is via existing tracks that already accommodate heavy vehicle use as part of the established baseline condition.
FOR4	Mixed Deciduous Woodland – Priority Habitat: Mixed deciduous woodlands are listed on the National Forest Inventory and the Priority Habitat Inventory (England). These were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 “Duty to conserve and enhance biodiversity” and Sect 41 – “List of habitats and species of principle importance in England”.	The Applicant notes the comments set out by the Forestry Commission in regard to Mixed Deciduous Woodland – Priority Habitat (which is recognised as such within ES Appendix 7.2: Baseline Ecological Survey Report [APP-148] with embedded mitigation including suitable buffer zones and protective measures secured through the oCEMP [APP/7.6.1], oLEMP [APP/7.11.1] and Design Principles, Parameters and Commitments [APP/5.8.1]. Enhancement and suitable management of woodland blocks is secured within the oLEMP [APP/7.11.1] and will contribute towards the calculated biodiversity net gain as identified within the Biodiversity Net Gain Assessment Report [APP/7.4.1].
FOR5	Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development. The extent of woodland loss is unclear in the application, although a worst case scenario mentions the partial loss of Woodland W21. W21 is a mixed deciduous priority habitat woodland. We note that retained woodlands benefit from a 15m buffer and will be protected during construction with the use of fenced construction exclusion zones. Although these woodlands have been excluded from the order limits, several of them will be entirely surrounded by the development and will become isolated in their landscape as a result, particularly with the use of deer fencing. Woodlands that become isolated in their landscape and surrounded by development will deteriorate over time if habitat connectivity is not considered and provided.	The Design Principles, Parameters and Commitments [APP/5.8.1] 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 as secured in the oLEMP [APP/7.11.1]. New habitat creation will include grassland, scrub, and attenuation features. The Applicant has also enhanced the existing features within the Site; measures include: • 50m offsets associated with Fincham Drove and Petticoat Drove (and respective PRoW South Acre RB6 and RB1), creating 50m wide routes through the Site, amplifying their role as key green infrastructure corridors and reinforcing their legibility; and • Creation of tree belts along the eastern and western edges of Field 27 which will provide connectivity between the woodland blocks. As such, the existing woodlands will be entirely retained, with a number of these enhanced (as detailed within the Biodiversity Net Gain Assessment Report [APP/7.4.1]), and the connectivity between the woodlands maintained.
FOR6	Tree and Woodland Planting: We note that landscape plans include planting tree belts, woodland and hedgerow trees, which totals 1.1ha of woodland planting. Which is a very small proportion of the site (approximately 0.13% of the whole 840ha site) Therefore it would not meet the Governments definition of woodland; which would typically be: • a minimum area of 0.5ha • a minimum width of 20m • a potential tree canopy cover of at least 20% • a canopy consisting of specimens that meet the definition of trees EN-1 Overarching National Policy Statement for Energy (2025) Section 4.3.20 states: ‘The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource	There are two separate proposed woodland block areas within Field 27, with respective areas of approximately 0.59ha and 0.48ha. These proposed woodland blocks are situated to the south of Fincham Drove, adjacent to Bartholomew's Hill Plantation. . As stated above, the Scheme proposes new woodland areas of approximately 1.07 ha which connect existing woodland blocks. When considered alongside the adjacent Bartholomew's Hills Plantation (4.254 ha), and the isolated woodland block to the south of Field 27 (1.80ha), the total canopy area once new woodland is established, would equate to over 5 ha. It should be noted that, as well as the creation of these new woodland areas, the Scheme also proposes new lengths of hedgerow, extensive new reinforcement infill hedgerow planting and new hedgerow trees as detailed within the oLEMP [APP/7.11.1]. The Planning Statement [APP/5.5.1] recognises the ambitions, goals and targets set out in the government's Environmental Improvement Plan for improving the natural environment and heritage, including achievement of statutory targets set under the Environment Act 2021. The Planning Statement [APP/5.5.1] goes on to



Reference number	Representation	Applicant response
	efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State should have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act.'	recognise that the ES [APP/6.1 - 6.5] has been prepared in accordance with and with acknowledgement of the relevant paragraphs of NPS EN-1, such as paragraph 4.3.20.
FOR7	A greater extent of woodland creation that is well-designed and managed is encouraged as more proportionate to the scale of development in the context of national targets, local biodiversity policies and targets (including the local nature recovery strategy). Our view is that well designed buffers with an enhanced woodland edge habitat and improved connectivity more broadly (through habitat creation and enhancement) is required to avoid degrading all affected woodland habitat. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between existing woodland blocks, to link them and ensure maximum gains to increase habitat connectivity, making woodlands more resilient and to benefit biodiversity across the whole site. Ideally we would like to see woodland creation to be carried out in 5ha blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha. With a changing climate, a wide species selection will be beneficial, mixed woodland is usually of maximum benefit for habitat provision.	There are two separate proposed woodland block areas within Field 27, with respective areas of approximately 0.59ha and 0.48ha. These proposed woodland blocks are situated to the south of Fincham Drove, adjacent to Bartholomew's Hill Plantation. As stated above, the Scheme proposes new woodland areas of approximately 1.07ha, which improve connectivity between Bartholomew's Hills Plantation and the isolated woodland block to the south of Field 27. It should be noted that, as well as the creation of these new woodland areas, the Scheme also proposes new lengths of hedgerow, extensive new reinforcement infill hedgerow planting and new hedgerow trees as detailed within the oLEMP [APP/7.11.1]. A climate considered species selection has been detailed in the oLEMP [APP/7.11.1], which will be utilised for on-site planting.
FOR8	Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites, this includes climate change predictions to allow for future suitability and woodland resilience. We note plans are in place for the long term management and maintenance of existing woodlands on site.	Exact tree species selected for planting will be specified within the detailed Landscape and Ecological Management Plan, with indicative species mixes provided within the oLEMP [APP/7.11.1] . The Applicant acknowledges that the Forestry Commission ESC can assist with selection of tree species that are ecologically suited to particular sites.
FOR9	As this project will include a large area of fencing, it has the scope to exclude a large amount of farmland from the deer range in the area. In areas where woodlands are contained and surrounded by the site, fencing could curtail their movement if they are inside the fencing. This is likely to increase herbivore browsing and grazing to other areas in close proximity to the site. Impacts are likely to increase in surrounding woodlands, including ancient woodlands and the wider landscape, where hedgerows and stewardship schemes may be impacted upon. Large scale fencing will change how deer move through the landscape, which may also increase the numbers of deer crossing local roads, including the A1065 and therefore may increase the numbers of deer vehicle collisions in the area. If culls occur prior to development, the risks should reduce.	The operational area of the Scheme will be enclosed within perimeter fencing as shown on the Green Infrastructure Strategy Plans in Appendix 1 of the oLEMP [APP/7.11.1]. The perimeter fencing strategy has been designed to allow for the movement of wildlife through the Site. Therefore dispersal impacts on wildlife are not anticipated owing to the incorporation of these movement corridors and above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation, as detailed within Section 7.7 ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] and secured within Design Principles, Parameters and Commitments [APP/5.8.1]. Impacts on mammal species, including deer, in relation to nature conservation and biodiversity are considered within ES Chapter 7: Ecology and Biodiversity [APP/6.2.1], which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. Woodland habitats likely providing the focus of existing deer use will remain outside of the protection fencing, with wide corridors in particular along the droves which will provide continued routes through the site for deer. These routes will therefore remain largely unchanged from the existing position.



3.2 RR-036, National Grid Electricity Transmission Plc

Reference number	Representation	Applicant response
NGET1	Introduction This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc (“NGET”) in respect of the Project, and in particular NGET has existing infrastructure and land interests which will be located within and in close proximity to the Project’s Order limits, where interactions may occur.	The Applicant notes this comment.
NGET2	The Applicant is seeking the permanent freehold acquisition of land, and the acquisition of temporary and permanent rights over a number of plots containing NGET rights and assets for NGET’s existing 4VV 400 kilovolt (kV) overhead line routes, including those shown on plots 1-07, 1-08, 2-13, 2-14, 2-18, 2-21, 2-24, 2-27, 2-32, 2-34, 2-35, 2-36 and 2-37 of the Land Plans [Ref: EN0110013 APP/2.2].	The Applicant agrees with this comment.
NGET3	NGET also notes land has been included within the Order limits for the purposes of Work No. 4 (works in connection with a new National Grid substation) and Work No. 5 (works in connection with a connection to the existing overhead transmission electric line) as noted in Work Plans [Ref: EN0110013 APP/2.3].	The Applicant agrees with this comment.
NGET4	NGET’s Statutory Duties As a responsible statutory undertaker, NGET’s primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to apparatus and land which is within or in close proximity to the Project’s draft Order limits. Additionally, NGET must protect its ability to deliver, operate and maintain its future proposed infrastructure.	The Applicant notes this comment.
NGET5	NGET will therefore require appropriate protection for retained or proposed infrastructure, including compliance with relevant standards for /works proposed within close proximity of its apparatus or proposed apparatus.	The Applicant notes National Grid Electricity Transmission’s requirement for appropriate protection, including in relation to compliance with relevant standards. The Applicant has included, at Part 3 of Schedule 15 of the draft DCO [APP/3.1.1] , a set of protective provisions for National Grid Electricity Transmission’s benefit. The Applicant is confident that these protective provisions, along with an associated side agreement if required, will be sufficient to address National Grid Electricity Transmission’s concerns. The Applicant welcomes comments from National Grid Electricity Transmission on the form of these protective provisions.
NGET6	NGET’s rights of access to inspect, maintain, renew and repair such apparatus must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET’s interests in land or NGET’s apparatus, NGET will require appropriate protection. Further discussion and agreement with the Applicant is required in relation to the impact on its apparatus and rights.	The Applicant notes National Grid Electricity Transmission’s concerns and welcomes the further discussion that will take place between the parties in relation to the impact of the Scheme on National Grid Electricity Transmission’s apparatus and rights. The Applicant has included, at Part 3 of Schedule 15 of the draft DCO [APP/3.1.1] , a set of protective provisions for National Grid Electricity Transmission’s benefit. The Applicant is confident that these protective provisions, along with an associated side agreement if required, will be sufficient to address National Grid Electricity Transmission’s concerns.
NGET7	Existing NGET Apparatus NGET owns and operates the following assets located within and in close proximity to the Order limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets impacted are as follows: 4VV 400 kV OHL NORWICH MAIN - WALPOLE 1 NORWICH MAIN - WALPOLE 2	The Applicant notes this comment.



Reference number	Representation	Applicant response
NGET8	Grid Connection Arrangements The Grid Connection Statement (EN0110013 APP/7.1) submitted by the Applicant states that the Point of Connection (PoC) for the Project will be located at a new Swaffham 400 kV National Grid Substation. The DCO Application provides for the compulsory acquisition of the necessary land and powers to construct the new substation as part of this DCO Application. NGET wish to note, however that NGET are not currently developing proposals to build a new substation within the Project's order limits. The location of the new substation is still to be confirmed with siting studies to be reviewed post Connection Reform, and therefore maybe sited in a different location, NGET is unable to confirm the connection point at this stage.	The Applicant agrees with National Grid Electricity Transmission's statement that National Grid Electricity Transmission is not currently developing proposals to build a new substation within the Scheme's Order limits, and notes that the responsibility for developing the proposals for the National Grid Substation is currently placed upon the Applicant. National Grid Electricity Transmission's reference to "<i>post Connection Reform</i>", in the opinion of the Applicant, would mean that National Grid Electricity Transmission would not be reviewing the proposed location for the National Grid Substation until at least mid-late 2027 (possibly even later than that, given that most of the key Connection Reform published timelines have not been adhered to so far in the industry). This timeframe would conflict with the Applicant's contractual and time-stamped obligations (i.e. to apply for planning consent by 30 March 2027 and inform National Grid Electricity Transmission of the location of the National Grid Substation by 28 February 2028). Until National Grid Electricity Transmission or National Energy System Operator (NESO) confirm otherwise, these contractual documents comprising the Applicant's grid connection offer for the Scheme remain binding, meaning the Applicant is contractually obligated to meet the milestones within. The Applicant wishes to reiterate that it has: • complied with its contractual obligations to "<i>obtain land and consent</i>" for the National Grid Substation under the terms of the grid connection offer • provided the proposed location of the National Grid Substation to National Grid Electricity Transmission • provided confirmation of the requisite land rights to National Grid Electricity Transmission • been in frequent and regular dialogue with National Grid Electricity Transmission since 2022; and • consulted National Grid Electricity Transmission on the DCO Application (i.e. which would consent the National Grid Substation in the proposed location). On a wider note, the Applicant considers that the continuing delays caused by the Connection Reform should not cause corresponding delays to the planning process, and notes the following points: • Grid connection offers contain contractual deadlines for applying for and securing corresponding planning consents, so these consent applications must be able to progress in order to maintain valid grid connections • Connection Reform prioritises projects that are further progressed; therefore, contractual milestones pertaining to land rights and planning consent are recognised and rewarded when processing the queue of projects; and • If the planning process is delayed until the Connection Reform is complete, in the hope of achieving more certainty about the grid connection status of various projects, but simultaneously a project is ranked lower in the queue of projects during the Connection Reform for not progressing its planning consent (or, indeed, that project's grid connection offer is rescinded for missing milestones), then development will grind to a halt in the UK until the two can be decoupled. In terms of the implications for delivery, the Applicant's expectation is that National Grid Electricity Transmission will determine that the proposed location for the National Grid Substation is suitable (given the Applicant's site selection methodology being akin to National Grid Electricity Transmission's site selection process). However, the Applicant retains the ability to separately seek consent for the grid connection from the Customer Substation to the National Grid Substation in the unlikely event that National Grid Electricity Transmission subsequently decides that they would prefer to site the National Grid Substation elsewhere. The information provided above is expanded upon in the Applicant's response to section 89(3) letter dated 17 March 2026 [AS-063].



Reference number	Representation	Applicant response
NGET9	NGET urges the Applicant to confirm, in their connection agreement with NESO, the connection point. This is essential to avoid ambiguity and ensure that all parties' statutory and operational requirements are met.	The Applicant has a grid connection offer for the Scheme requiring it to secure consent and land for the point of connection. Consent is being sought for the National Grid Substation in a location that the Applicant considers suitable based on National Grid Electricity Transmission's criteria. Consent for the potential National Grid Substation in this location should therefore be fully examined by the Examining Authority, and National Grid Electricity Transmission will then have the option to carry out the works should National Grid Electricity Transmission determine that the proposed site for the National Grid Substation is suitable. However, in the unlikely event that National Grid Electricity Transmission indicates a preference for an alternative location (at whatever stage in the process), the Applicant retains the ability to seek a separate consent (with updated environmental information and assessment) for the connection to the National Grid Substation as a result. The information provided above is expanded upon in the Applicant's response to section 89(3) letter dated 17 March 2026 [AS-063].
NGET10	Future NGET Apparatus There are no currently known direct interactions between the Project and NGET new infrastructure projects. NGET requires that all its existing and future assets, land, and rights are appropriately protected to ensure it can continue to meet its statutory obligations. NGET remains committed to working with the Applicant in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible however NGET must have adequate protection for its future projects, including protection for future assets and the reservation of future land and rights necessary for the delivery of those projects.	The Applicant notes this comment and welcomes future engagement with National Grid Electricity Transmission. The Applicant notes that protective provisions for the benefit of National Grid Electricity Transmission are included in Part 3 of Schedule 15 of the draft DCO [APP/3.1.1] and welcomes comments from National Grid Electricity Transmission on these protective provisions.
NGET11	Protection of NGET Assets As set out above, NGET disagrees with the Project on the basis that the connection point has not yet been determined or agreed with NGET. NGET will, however, continue to seek to ensure that its Protective Provisions be included within the draft DCO for the Project to ensure that all NGET existing assets are adequately protected and that all works by the Applicant comply with relevant safety standards, however noting NGET's wider position with regards to the scope of what is being proposed by the Applicant with regards to construction of a future substation.	The Applicant notes that protective provisions for the benefit of National Grid Electricity Transmission are included in Part 3 of Schedule 15 of the draft DCO [APP/3.1.1] and welcomes comments from National Grid Electricity Transmission on these protective provisions.
NGET12	Compulsory Acquisition Powers in Respect of the Project Where the Applicant seeks powers of compulsory acquisition over NGET land, or land in which NGET holds rights or apparatus, the Protective Provisions must require the Applicant to obtain NGET's prior written consent to the exercise of such powers.	The Applicant notes that the protective provisions for the benefit of National Grid Electricity Transmission, which are included in Part 3 of Schedule 15 of the draft DCO [APP/3.1.1], already include such a requirement. Paragraph 23(1) states as follows: <i>"Regardless of any provision in this Order or anything shown on the land plan or contained in the book of reference to the Order, the undertaker may not appropriate or acquire or take temporary possession of any land or apparatus or appropriate, acquire, extinguish, interfere with or override any easement, other interest or right or apparatus of National Grid otherwise than by agreement (such agreement not to be unreasonably withheld or delayed)."</i>
NGET13	NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with any NGET projects identified during the Examination process, and as negotiations continue, but in the meantime will continue to liaise with the Project with a view to reaching a satisfactory agreement during the Examination process and will keep the Examining Authority updated in relation to these discussions.	The Applicant notes this comment and welcomes future engagement with National Grid Electricity Transmission.





3.3 RR-038, Natural England

Reference number	Representation	Applicant response
NE1	Part I: Summary and conclusions of Natural England's advice Summary of Natural England's advice Based on the current details presented, Natural England are broadly satisfied with the current proposals. We agree with the HRA conclusion that the project will not have an adverse effect on the integrity of the Breckland Special Protection Area (SPA) or Norfolk Valley Fens Special Area of Conservation (SAC).	The Applicant welcomes this comment.
NE2	With the Construction Environmental Management Plan (CEMP) and the measures contained within it secured, we also consider it unlikely for the proposal to have an adverse effect on the named Sites of Special Scientific Interest (SSSIs).	The Applicant welcomes this comment.
NE3	However, there are several issues, which remain dependent on further information being provided. These relate to the need for timely protected species licences, uncertainties regarding soils and Best and Most Versatile land—including reliance on provisional Agricultural Land classification data for site selection, and the provision of a detailed soil management plan — and the need to strengthen the outline Landscape and Ecological Management Plan by aligning it with the final Norfolk Local Natural Recovery Strategy and clarifying success criteria, remedial triggers and long-term management responsibilities. Natural England will continue to work with The Drovers Solar Farm Limited to resolve the outstanding matters.	The Applicant notes Natural England's concerns and has responded to the issues raised in turn below. The potential need for Natural England licencing is discussed in paragraphs 7.9.2 and 7.9.3 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] in regard to badgers. A licence is not currently anticipated to be required in respect of badgers, given the existing setts are fully retained and subject to appropriate buffers. Given Badger are dynamic animals and levels of Badger activity can rapidly change at a site, with new setts created at any time, an update survey has been recommended prior to works commencing, in order to confirm that no new setts have been created. The Applicant has committed to minimum offsets to badger setts as secured within the Design Principles, Parameters and Commitments [APP/5.8.1], however should any new setts be identified at that time (within the development area), depending on the up-to-date position at that time, it may be that the detailed design needs amending or further measures are required (including potentially licensing should new setts arise within/adjacent to areas requiring construction activity). Clearly, it is not possible to predict the future changes in this regard and accordingly, as a matter of best practice, the approach that would be taken (i.e. obtaining any relevant licensing should such changes occur) is provided to ensure such eventualities are addressed. No requirement for protected species licences in relation to other species has been identified. In particular, ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] confirms that no bat roosts will be affected (such that licensing would not be required in regard to roosting bats), whilst given the distance from any ponds supporting Great Crested Newts, no licensing would be required in regard to this species. Accordingly, no licence applications are required at this time, and as such no Letter of No Impediment (LONI) would be appropriate or necessary based on the current position. The site evaluation process has been informed by a number of baseline and technical studies, as detailed in Appendix 1: Site Evaluation Report to the Planning Statement [APP/5.5.1]. Agricultural Land Classification (ALC) and land type were an important factor for the Applicant when evaluating the Site. Paragraph 4.4.20 of Appendix 1 Site Evaluation Report states that “consistent with national policy, the Applicant considered the best and most versatile land based on the available data at the time of the initial site evaluation, which was the Natural England Agricultural Land Classification (ALC) maps”. The Applicant further states, in paragraph 4.4.22, that “this approach to considering ALC values, in terms of the use of provisional and predictive mapping, has been considered as both satisfactory and proportionate by the Examining Authorities and Secretary of State in relation to, for example, the made Heckington Fen Solar Farm, Gate Burton Energy Park and Mallard Pass Solar Farm DCOs”. Additionally, an ALC report, informed by soil samples, was prepared (ES Appendix 11.2: Agricultural Land Classification [APP-168]) and used to inform the siting of



Reference number	Representation	Applicant response
		infrastructure within the Site, as well as the impact of the Scheme on soils and agricultural land, as assessed in ES Chapter 11: Soils and Agriculture [AS-018]. The oSMP [APP/7.13.1] contains the management measures related to the use and handling of soils, and sets the framework for what will become the detailed Soil Management Plan. The Applicant is required, under Requirement 17 of Schedule 2 of the draft DCO [APP/3.1.1], to produce a detailed Soil Management Plan that is substantially in accordance with the oSMP [APP/7.13.1]. The oLEMP [APP/7.11.1] has been updated at Deadline 1 to make reference to the adopted LNRS and take account of the relevant updates, including clarifying success criteria, remedial triggers and long-term management responsibilities. The Applicant welcomes ongoing engagement with Natural England.
NE4	1.1.9. Natural England will continue discussions with the Drovers Solar Farm Limited to seek to resolve these concerns and agree outstanding matters in a Statement of Common Ground. Failing satisfactory agreement, Natural England advises that the matters set out in Section 4 will require consideration by the Examining Authority as part of the examination process.	The Applicant notes this comment and welcomes ongoing engagement with Natural England. The Applicant is confident that the parties will reach agreement on all matters during the Examination. The Applicant also confirms that it has submitted a Statement of Common Ground with Natural England [APP/5.15] at Deadline 1.
NE5	1.2. The Natural Features Potentially Affected by this Application Internationally Designated Sites 1.2.1. Natural England's position regarding impacts on internationally designated sites is summarised below. Further detail on our reasoning for this is given against each impact pathway in Part II. 1.2.2. Natural England has no 'amber' or 'red' issues identified for the DCO project. It can be ascertained beyond reasonable scientific doubt that the project would not have an adverse effect on the integrity of the following internationally designated sites: Breckland Special Protection Area, and Norfolk Valley Fens Special Area of Conservation. 1.2.3. With regard to potential impacts from air emissions to internationally designated sites, we refer you to Appendix 1 - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs).	The Applicant welcomes this comment.
NE6	Nationally Designated Sites 1.2.4. Natural England's position regarding nationally designated sites is summarised below. Further detail on our reasoning for this is given against each impact pathway in Part II. 1.2.5. Natural England has no 'amber' or 'red' issues identified for the DCO project. It can be ascertained that the proposal will not damage or destroy the interest features for which the following Sites of Special Scientific Interest (SSSIs) have been notified: Breckland Forest SSSI, River Nar SSSI, Potter & Scarning Fens, East Dereham SSSI.	The Applicant welcomes this comment.
NE7	1.2.6. Natural England welcomes the embedded mitigation measures outlined in the Construction Environmental management plan to treat surface water run off for water quality and quantity into sensitive waterbodies connected to the River Nar SSSI. This includes: maintaining 10 m buffers to all watercourses;	The Applicant welcomes this comment.



Reference number	Representation	Applicant response
	• using silt fencing, traps and settlement lagoons; • applying Sustainable Urban Drainage System (SuDS) features; • implementing a Pollution Prevention Plan; • applying Horizontal Direct Drilling breakout contingency measures; • managing clean and dirty water separately; • stabilising exposed soils; and • monitoring surface-water quality with stop-work triggers where required.	
NE8	1.2.7. We advise that the Construction Environmental Management Plan (CEMP) and the measures contained within are secured for the entire duration of the construction phase. We advise that the SuDS features should be secured of the lifetime of the development to ensure the SuDS features are maintained and surface water pollution impacts to sensitive waterbodies are avoided.	The Applicant can confirm that the measures outlined in the oCEMP [APP/7.6.1] will be implemented for the duration of the construction phase. The Applicant is required, under Requirement 13 of Schedule 2 of the draft DCO [APP/3.1.1], to produce a detailed Soil Management Plan that is substantially in accordance with the oOEMP [APP/7.8.1]. ES Appendix 12.2: Flood Risk Assessment [AS-053] states that SuDS features are secured for the 60-year lifetime of the Scheme, shown in paragraph 12.5.18, and will be sensitivity tested to a 40% climate change allowance. A maintenance scheme for all drainage infrastructure will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO, as secured within section 2.14 of the oOEMP [APP/7.8.1]. The use of SuDS will ensure surface water pollution impacts to sensitive waterbodies are avoided, as shown in paragraph 12.4.26 in ES Appendix 12.2: Flood Risk Assessment [AS-053].
NE9	1.2.8. With regard to potential impacts from air emissions to nationally designated sites, we refer you to Appendix 1 - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs).	Paragraph 16.4.10 within ES Chapter 16: Other Environmental Matters [APP-065] states that the maximum construction vehicle movements (368 two-way light duty vehicles (LDV) annual average daily traffic (AADT) movements and 86 two-way heavy duty vehicles (HDV AADT) movements on the A1065 South) are expected to be below the DMRB criteria of an increase in AADT of 1000 (or 200 HDVs), indicating that further assessment is not required of sensitive ecological receptors. In addition, the potential for a cumulative impact with other plans and projects has been reviewed, as detailed in Table 16-2 of ES Appendix 16.1: Consultation and Legislation, Planning Policy and Guidance [APP-175], and, given the likely timing and traffic routing of construction traffic, it is considered unlikely that the DMRB criteria would be exceeded in combination on any one route within 200m of a sensitive ecological site. This is in accordance with the IAQM guidance for the assessment of air quality impacts on designated nature conservation sites. As such, an air quality assessment on ecological impacts was scoped out of the ES as confirmed within ES Appendix 2.2: Scoping Opinion Response [APP-134] at ID 3.5.3.
NE10	Protected Species 1.2.9. Natural England's comments on protected species presented at the PEIR stage remains outstanding and therefore is an amber issue. 1.2.10. Natural England made the following comments on the DCO project at PEIR stage: <i>"It is acknowledged in Chapter 7 of the PEIR that protected species licences from Natural England or Defra may be required. Applicants should refer to the guidance at Wildlife licences: when you need to apply² to check to see if a mitigation licence is required. Via our discretionary advice service (DAS), Natural England can review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed</i>	ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] concludes that under the current Scheme design, and subject to the embedded and additional mitigation measures being in place, there will be negligible impacts on protected species. The potential need for Natural England licencing is discussed in paragraphs 7.9.2 and 7.9.3 in regard to badgers. A licence is not currently anticipated to be required needed in respect of badgers given the existing setts are fully retained and subject to appropriate buffers. Given badgers are dynamic animals and levels of badger activity can rapidly change at a site, with new setts created at any time, an update survey has been recommended prior to works commencing, in order to confirm that no new setts have been created. Should any new setts be identified at that time (within the development area), depending on the up-to-date position at that time, it may be that further measures are required (including potentially licensing should new setts arise within/adjacent to areas requiring construction activity). Clearly it is not possible to predict the future changes



Reference number	Representation	Applicant response
	<i>to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. See Annex C – Natural England and the Planning Inspectorate³ for details of the LONI process.”</i> 1.2.11. Natural England note that the Environmental Statement (ES) still identifies that protected species licences may still be required due to the known presence species in the area. However, no indication has been provided that a licence has been/will be applied for. Natural England therefore strongly advice that this is undertaken at the earliest opportunity to prevent delay.	in this regard and accordingly, as a matter of best practice the approach that would be taken (i.e. obtaining any relevant licensing should such changes occur) is provided to ensure such eventualities are addressed. No requirement for protected species licences in relation to other species has been identified. In particular, ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] confirms that no bat roosts will be affected (such that licensing would not be required in regard to roosting bats), whilst given the distance from any ponds supporting Great Crested Newts, no licensing would be required in regard to this species. Accordingly, no licence applications are required at this time, and as such no LONI would be appropriate or necessary based on the current position.
NE11	Biodiversity Net gain 1.2.12. Natural England's position regarding provision of biodiversity net gain is summarised below. Further detail on our reasoning for this is given in Part II. 1.2.13. Natural England welcome the demonstration of >10% net gains for biodiversity using the Defra Biodiversity Metric. Gains can be secured through planning obligations, conservation covenants or requirements within the DCO. Natural England would welcome a commitment to delivering in excess of 10%. 1.2.14. We note that the assessment states that there are no watercourses within the order limits, however, it is Natural England's understanding that there are drainage ditches within the development boundary. We therefore recommend that these are considered within the BNG assessment and 10% uplift is also delivered for these habitats.	Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], using the Government metric and associated guidance. This demonstrates that the Scheme will deliver a BNG substantially 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. Whilst no statutory requirement is currently in place in relation to DCO schemes, the identified BNG is therefore substantially in excess of the figure of 10% currently required for new developments under the Town and Country Planning Act 1990 and similarly anticipated for NSIPs under the emerging consultation information published by DEFRA. Government BNG Guidance set out within The Statutory Biodiversity Metric User Guide (Department for Environment Food & Rural Affairs, First published February 2024 Last updated 3 July 2025) provides a clear definition of a Watercourse Ditch, identifying that in order to qualify these would need to be “...less than 5 metres wide; and Are likely to retain water for more than 4 months of the year”. As set out at ES Figure 12.1: Ephemeral Ditches [APP-115] and within ES Chapter 12: Water Resources [APP-061], ephemeral ditches are present, which have been persistently dry (paragraph 12.6.67). A small number of ditches (predominantly associated with hedgerows) were recorded during the ecological survey work (as set out within ES Appendix 7.2: Baseline Ecological Survey Report [APP-148]), however these were recorded to remain dry during the survey work undertaken and, as such, whilst in line with their function they likely carry flows of water during high rainfall, none of the ditches within the Site were recorded to be of sufficient size, nor hold water for sufficient time, to qualify under the definition of a watercourse ditch set out within The Statutory Biodiversity Metric – User Guide (Defra, 2025). Accordingly, they have not been included within the Biodiversity Net Gain Assessment Report [APP/7.4.1].
NE12	1.2.15. Natural England advise that the Local Nature Recovery Strategies (LNRS), a new mandatory system of spatial strategies for nature established by the Environment Act 2021, could provide opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience. We advise that habitats and species measures within the Landscape and Ecology Management Plan (LEMP) and BNG delivery, should be aligned with the published Norfolk LNRS.	The Applicant notes this comment. The Norfolk LNRS was published after the Biodiversity Net Gain Assessment Report [APP/7.4.1] had already been undertaken. The BNG Assessment Report has been updated to take into account the published Norfolk LNRS at Deadline 1. Further, the oLEMP [APP/7.11.1] has been updated at Deadline 1 to make reference to the adopted LNRS and take account of the relevant updates.
NE13	Nationally Designated Landscapes 1.2.16. The proposed projects are not located within, or within the setting of, any nationally designated landscapes (National Parks or National Landscapes). As a result, Natural England has no specific comments to make on the further landscape implications of this proposal. No further detailed comments are given.	The Applicant welcomes this comment.
NE14	Soils and Best and Most Versatile Agricultural Land	Natural England's willingness to work with the Applicant is welcomed.



Reference number	Representation	Applicant response
	1.2.17. Natural England provided comprehensive comments on soils and Best and Most Versatile (BMV) agricultural land at the PEIR stage and will continue to work with the Applicant on this matter. 1.2.18. Natural England identifies several amber issues relating to soils and BMV land, including concern that the site location was selected using provisional Agricultural Land Classification (ALC) mapping, which could not distinguish between Grades 3a and 3b and therefore limited early avoidance of BMV soils; the subsequent detailed ALC survey shows that around 54% of the Order limits comprise BMV land, reinforcing the need for strong protection measures. Additional amber concerns relate to incomplete baseline information where parts of the Grid Connection Infrastructure have still not been surveyed. There is a risk of permanent soil degradation from temporary construction activities if undertaken inappropriately, and an ES methodology that may under-represent impacts by applying fixed area thresholds rather than aggregating permanent and long-term BMV losses across the scheme.	Natural England's comment that initial site location was based on provisional ALC mapping is noted, but the Applicant notes that there is a lack of alternative data availability, and any implicit criticism of the use of this data is rebutted. As set out in ES Chapter 11: Soils and Agriculture [AS-018], at section 11.7, the provisional mapping shows the Order limits as mostly undifferentiated Grade 3. These maps were produced between 1967 and 1974, as set out in Natural England's Technical Information Note 'Agricultural Land Classification: protecting the best and most versatile agricultural land' (TIN049) (see Reference 11-10 in ES Chapter 11: Soils and Agriculture [AS-018]). The Applicant acknowledges that these were designed to provide general guidance, rather than for site-specific use, but equally they are all that was available to the Applicant. Natural England (and its predecessors) have not updated these maps, despite the ALC methodology changing (in 1976 and 1988); rather, these have been reprinted (2010) and digitised (2017). Further, these maps were not used in isolation. In 2017, Natural England produced a collection of Likelihood of BMV maps. The relevant extract is set out at Plate 11-24 of ES Chapter 11: Soils and Agriculture [AS-018], which identifies the Order limits as falling almost fully in the "low likelihood of BMV (<20% area BMV)". Therefore, the published information showed the Site as having the lowest proportion of BMV in the wider area. It is noted that the recently published Land Use Framework for England (HM Government, March 2026) introduces some updated mapping for ALC, but this is not yet available. Accordingly, the Applicant utilised the information available to it at the time (which remains the only information available) prior to field testing. As Natural England notes, a small part of the Order limits (relating to the Grid Connection Infrastructure) has not been the subject of an ALC survey, but this area is included only to allow for the re-stringing of overhead power cables, with no disturbance to soil except for vehicle trafficking. Soil suitability assessments prior to vehicle trafficking are secured in the oSMP [APP/7.13.1]. Natural England comments that the ES may under-represent impacts by not aggregating permanent and long-term BMV losses. This is not accepted. In ES Chapter 11: Soils and Agriculture [AS-018], the effects of the various components of the Scheme are assessed in section 11.8 of ES Chapter 11: Soils and Agriculture [AS-018], and the short-term, long-term and permanent losses are then all aggregated to provide the assessment. Table 11-7 of ES Chapter 11: Soils and Agriculture [AS-018] provides a full breakdown of all impacts. The effects are not therefore under-represented.
NE15	1.2.19. Natural England also notes limited assessment of Battery Energy Storage Systems (BESS) levelling works, where soil sensitivity and reversibility are not clearly defined, and advises that the cumulative assessment should consider wider county-level development. To address the above risks, Natural England recommends micro-siting permanent infrastructure to avoid BMV soils and securing detailed soil protection, reinstatement and monitoring measures within the DCO.	In respect of the BESS levelling works, the land quality is clearly defined (see ES Chapter 11: Soils and Agriculture [AS-018], paragraphs 11.8.35 to 11.8.42) for the areas proposed for the BESS and National Grid Substation and Customer Substation, with excerpts from the Illustrative Proposals and from the ALC Plan (Plates 11-34 and 11-33 respectively in ES Chapter 11: Soils and Agriculture [AS-018]). The soil sensitivity is also clearly defined, and Plate 11-39 of ES Chapter 11: Soils and Agriculture [AS-018] provides a mapped area where soils are of medium sensitivity. The siting of the fixed equipment was determined following consideration of multiple factors, environmental and operational, including land quality. ES Chapter 11: Soils and Agriculture [AS-018] sets out the effects on land quality and soils resulting from the illustrative layout. Micro-siting is addressed in ES Chapter 11: Soils and Agriculture [AS-018]. The amount of land by ALC grade that is affected by temporary or permanent disturbance is summarised in Table 11-7 of ES Chapter 11: Soils and Agriculture [AS-018], and amounts to 38ha of BMV. The majority of this, except for 4.5ha for the National Grid Substation and Grid Connection Infrastructure, will be restored to comparable grade on decommissioning. Mitigation planting will add a further 4.3ha of BMV land to the total, as a land use change.



Reference number	Representation	Applicant response
		ES Appendix 2.4: Cumulative Schemes [APP-136] presents the methodology for selecting cumulative schemes, as well as presenting the schemes considered for assessment as part of the cumulative effects assessment within the ES. As per ES Appendix 2.4: Cumulative Schemes [APP-136], the search for cumulative schemes was not limited to developments of a similar type or sector; the 'long list' of cumulative schemes was undertaken using the following criteria: - Within the Zone of Influence - Meets thresholds for EIA Development - Developments currently not yet complete and operational (reasonable effort has been made to determine this from publicly available online sources) - Local and regional authority applications with extant permission (cases since 31/01/2020) - Development listed on the National Infrastructure Planning online map - Strategic developments identified in the relevant Development Plan (and emerging Development Plans); and - Development identified in other plans and programmes which set the framework for future development consents/approvals, where such development is reasonably likely to come forward. The long list of cumulative schemes was discussed with the Local Planning Authorities and finalised for assessment in the ES. On a topic-by-topic basis, the cumulative schemes with the potential for in-combination effects have been identified by the technical author and assessed within each technical ES chapter. Section 11.11 of ES Chapter 11: Soils and Agriculture [AS-018] considers the cumulative effects with other large-scale solar proposals and concludes that the cumulative effect is also small, around 1% of farmed land in Norfolk. Soil protection is addressed in ES Chapter 11: Soils and Agriculture [AS-018] and secured through the oSMP [APP/7.13.1].
NE16	1.2.20. Natural England welcomes the outline Soil Management Plan (SMP) but finds it too high-level to give confidence that soils—particularly BMV land—will be protected at this current stage, and therefore it is an amber issue. Key methods and controls are deferred to a future detailed plan. As a result, Natural England cannot yet determine whether soil quality will be protected or restored following works and expects these issues to be addressed and secured in the detailed SMP through a DCO requirement.	The Applicant notes that it has followed standard and well-precedented procedure in relation to the level of detail contained in the oSMP [APP/7.13.1]. Natural England comments that it expects greater details to be set out in a detailed Soil Management Plan, to be secured through a DCO requirement. This is also the Applicant's expectation, as set out in paragraphs 1.1 to 1.3 of the oSMP [APP/7.13.1]. The Applicant is required, under Requirement 17 of Schedule 2 of the draft DCO [APP/3.1.1], to produce a detailed Soil Management Plan that is substantially in accordance with the oSMP [APP/7.13.1].
NE17	Ancient Woodland and Ancient/Veteran Trees 1.2.21. Natural England's position regarding ancient woodland and ancient/veteran trees is summarised below. Further detail on our reasoning for this is given in Part II. 1.2.22. Natural England has no 'amber' or 'red' issues identified for the DCO project with regard to ancient woodland and ancient/veteran trees. 1.2.23. Natural England note that the ES has identified veteran trees within or adjacent to the order limits of the proposed development. Ancient woodland and ancient and veteran trees are considered irreplaceable habitat and are protected in the National Planning Policy Framework. 1.2.24. Natural England welcome the commitment of measures detailed within the CEMP, which include a full BS5837:2012-compliant arboricultural survey	The Applicant notes this comment and confirms the commitments set out in ES Appendix 16.4: Arboricultural Impact Assessment [APP-178]. These are embedded in the oCEMP [APP/7.6.1], Design Principles, Parameters and Commitments [APP/5.8.1] and oLEMP [APP/7.11.1] for the retention and protection of Ancient and Veteran trees. The buffers and mitigation measures are in accordance with the Standing Advice produced by Natural England and the Forestry Commission. These measures will be detailed further within the detailed Landscape and Ecological Management Plan and detailed Construction Environmental Management, as requested, and secured via the corresponding requirements of the draft DCO [APP/3.1.1]. These documents will be secured for the lifetime of the Scheme.



Reference number	Representation	Applicant response
	pre-construction, strict Root Protection Area protection, arboricultural clerk of works oversight, no-dig methods, soil compaction prevention, dust/runoff control, micro-siting, and a prohibition on removal. We also welcome the inclusion of minimum buffer zones around ancient woodland and ancient and veteran trees detailed in the outline LEMP. These measures ensure the strict protection of ancient and veteran trees consistent with Natural England's Standing Advice. We advise that the CEMP and LEMP, and the measures detailed within to protect ancient and veteran trees, should be secured for the lifetime of the development. 1.2.25. For further advice in relation to working around ancient woodland and ancient and veteran trees when preparing mitigation measures, we advise the Applicant to refer to the standing advice⁴ produced by Natural England and the Forestry Commission.	
NE18	Outline Landscape and Ecological Management Plan 1.2.26. Natural England welcomes the outline Landscape and Ecological Management Plan (oLEMP); however, we consider that the document could be strengthened and therefore identify this as an amber issue. 1.2.27. Natural England has identified amber issues relating to the need to update the oLEMP to reflect the final Norfolk LNRS, and to strengthen the delivery framework for Biodiversity Net Gain, habitat creation, and long-term monitoring. Clarification is required on success criteria, remedial actions, hydrological features within BNG calculations, and responsibilities for ongoing management. 1.2.28. Natural England welcomes the positive commitments within the oLEMP — including significant BNG uplift, grassland creation, woodland and hedgerow establishment, and species mitigation —but advises that additional detail is needed on seed provenance, nesting-season restrictions, Curlew and Skylark measures, bat-sensitive lighting (if proposed), and long-term monitoring to ensure outcomes can be reliably secured for the lifetime of the development.	The Biodiversity Net Gain Assessment Report [APP/7.4.1] has been updated at Deadline 1 to reflect the published Norfolk LNRS, and the oLEMP [APP/7.11.1] has been updated at the same time to incorporate the items raised, with further detail secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.1]. In regard to bat sensitive lighting, the Design Principles, Parameters and Commitments [APP/5.8.1] confirms that <i>"The Solar arrays will not be lit during the operational phase"</i>, such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects are set out within the oCEMP [APP/7.6.1]. A Ground Nesting Bird Strategy has been prepared to fully mitigate potential impacts on these species ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149], which identifies measures and habitat provision to address potential impacts on Skylark and Curlew. Additional detail in regard to measures such as seed provenance and monitoring is secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.1].
NE19	1.3. Conclusions 1.3.1. The application gives rise primarily to green issues across internationally and nationally designated sites, ancient and veteran trees, and biodiversity net gain. Natural England agrees that there would be no adverse effect on the integrity of the Breckland SPA or Norfolk Valley Fens SAC, nor damage to the notified features of the Breckland Forest, River Nar or Potter & Scarning Fens SSSIs. We welcome the comprehensive mitigation secured through the CEMP to avoid impacts to the River Nar SSSI— including SuDS, pollution prevention measures, water-quality monitoring, and controls on surface-water runoff— and advise that these are secured for the relevant phases of construction and operation. We also welcome the commitments to protect ancient and veteran trees through BS5837:2012-compliant surveys, strict Root Protection Area safeguards, no-dig techniques, arboricultural oversight and appropriate buffer zones, noting that there are no amber or red issues for these receptors. The demonstration of >10% biodiversity net gain is supported, but a formal commitment to delivering in excess of 10% would be further welcomed. Additionally, alignment with the Norfolk LNRS is encouraged.	The Applicant welcomes this comment and has addressed the points raised above.
NE20	1.3.2. Three areas with amber issues remain: the requirement for protected species licences, and risks associated with soils and BMV agricultural land, and strengthening the oLEMP. For protected species, no indication has been provided	The Applicant notes the summary of these matters presented by Natural England and has responded to the detailed points for each matter above.



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	that licence applications have been submitted, and Natural England advises that this is undertaken as soon as possible to avoid potential delays, including seeking a LONI where appropriate. For soils and BMV land, Natural England highlights uncertainties arising from reliance on provisional ALC mapping during site selection, incomplete ALC survey coverage, and methodological limitations that may under-represent permanent or cumulative BMV losses; micro-siting of infrastructure and robust soil protection, handling, reinstatement and monitoring measures within the DCO are therefore essential. Additionally, the outline SMP is too high-level to give confidence that soils—particularly BMV land—will be protected at this stage. In relation to the oLEMP, Natural England advises that the document requires strengthening, particularly to reflect the final Norfolk LNRS and to provide clearer success criteria, remedial triggers and long-term management responsibilities, ensuring that proposed habitat creation and BNG measures can be delivered effectively.	
NE21	1.3.3. Natural England does not intend to make oral representations regarding this examination but is happy to work with the Applicant and examining authority to ensure the development will not have adverse impacts on the natural environment.	The Applicant notes this comment and looks forward to further engagement with Natural England.
NE22	Natural England's Relevant Representations Part II: Natural England's detailed advice 2.1. Part II of these representations expands upon the detail of any significant issues ('red' and 'amber' issues) which, in our view remain outstanding and includes our advice on pathways to their resolution where possible. Part II also shows 'green' issues where a resolution has been reached and subject always to the appropriate requirements being adequately secured and 'yellow' issues where Natural England doesn't agree with the Applicant's position or approach and we would ideally like this to be addressed but are satisfied that for this particular project it is unlikely to make a material difference to our advice or the outcome of the decision-making process 2.2. Natural England's advice is that there are a number of matters which have not been resolved satisfactorily as part of the pre-application process that must be addressed by the Drovers Solar Farm Limited and the Examining Authority as part of the examination and consenting process before development consent can be granted. Natural England will continue engaging with the Applicant to seek to resolve outstanding concerns throughout the examination. See Table 1 below highlighting the 'green', 'amber' and 'yellow' issues.	The Applicant notes this comment and confirms understanding with the approach taken in Part II of Natural England's representation. The Applicant has responded to the specific points made in turn below.
NE23	NE key issue ref: NE1 Topic: International designated sites – Breckland SPA and Norfolk Valley Fens SAC (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: We concur with the conclusion of the Shadow Habitats Regulations Assessment (SHRA) (APP/7.3) that likely significant effects on European sites can be ruled out, either alone or in combination with other plans or projects, and that there is therefore no need to progress to Stage 2 Appropriate Assessment.	The Applicant welcomes this comment.



Reference number	Representation	Applicant response
	With consideration to air emissions from the proposal and impacts to designated sites, we refer you to Appendix 1 of this letter - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs) Matters that must be secured in the DCO: n/a Risk Red/Amber/Green: Green	
NE24	NE key issue ref: NE2 Topic: National designated sites -Breckland Forest SSSI, River Nar SSSI and Potter & Scarning Fens, East Dereham SSSI (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: <u>Breckland Forest SSSI</u> Chapter 7 of the ES identifies Breckland Forest SSSI 2.7km from the proposed development and based on the information presented in the ES, Natural England concurs with the conclusion that there will be no significant adverse effects on the site. <u>River Nar SSSI</u> With consideration of air emissions potentially impacting the River Nar SSSI, we refer you to Appendix 1 of this letter - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs). Chapter 7 of the ES identifies a hydrological link to the River Nar SSSI from the proposed development site, and there is the 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. However, on the basis that the embedded mitigation measures detailed within the CEMP are implemented and secured, Natural England concurs that there will be no significant adverse effects on the River Nar SSSI. <u>Potter & Scarning Fens, East Dereham SSSI</u> Please refer to our comments in NE1 i.e. it is identified there is no hydrological connectivity to the site, and for air emissions we refer you to Appendix 1 of this letter - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs) Matters that must be secured in the DCO: Mitigation measures outlined in the Construction Environmental management plan to treat surface water run off for water quality and quantity into sensitive waterbodies connected to the River Nar SSSI. This includes: • maintaining 10 m buffers to all watercourses; • using silt fencing, traps and settlement lagoons; • applying Sustainable Urban Drainage System (SuDS) features; • implementing a Pollution Prevention Plan; • applying Horizontal Direct Drilling breakout contingency measures;	The Applicant welcomes this comment. ES Appendix 12.2: Flood Risk Assessment [AS-053] states that SuDS features are secured for the 60-year lifetime of the Scheme, shown in paragraph 12.5.18, and will be sensitivity tested to a 40% climate change allowance. A maintenance scheme for all drainage infrastructure will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO, as secured within section 2.14 of the oOEMP [APP/7.8.1]. The use of SuDS will ensure surface water pollution impacts to sensitive waterbodies are avoided, as shown in section 12.4.26 in ES Appendix 12.2: Flood Risk Assessment [AS-053].



Reference number	Representation	Applicant response
	- managing clean and dirty water separately; - stabilising exposed soils; and - monitoring surface-water quality with stop-work triggers where required. We advise these mitigation measures are secured for the entire duration of the construction phase. We advise that the SuDS features should be secured of the lifetime of the development to ensure the SuDS features are maintained and surface water pollution impacts to sensitive waterbodies are avoided. Risk Red/Amber/Green: Green	
NE25	NE key issue ref: NE3 Topic: Protected Specied (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: Natural England note that Chapter 7 of the ES identifies that licences may still be required due to the known presence of protected species in the area. However, no indication has been provided that a licence has been/will be applied for. Natural England therefore recommend this is undertaken at the earliest opportunity to prevent delay. We advise our comments at the PEIR stage remain outstanding – <i>"It is acknowledged in Chapter 7 of the PEIR that protected species licences from Natural England or Defra may be required. Applicants should refer to the guidance at Wildlife licences: when you need to apply⁵ to check to see if a mitigation licence is required. Via our discretionary advice service (DAS), Natural England can review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. See Annex C – Natural England and the Planning Inspectorate⁶ for details of the LONI process."</i> Matters that must be secured in the DCO: To be confirmed. Mitigation and/or compensation to protected species may be required depending on license application. For further info we refer you to - Protected species and development: advice for local planning authorities - GOV.UK Risk Red/Amber/Green: Amber	The Applicant refers to its responses to NE3 and NE10 above in this regard.
NE26	NE key issue ref: NE4 Topic: Biodiversity (C) – construction phase (O) – operational phase: O Natural England's (NE) commentary and advice on: Natural England welcomes the use of the Statutory Biodiversity Metric for the Biodiversity Net Gain (BNG) calculations (APP/7.4).	The Applicant welcomes aspects of this comment and refers to its responses to NE11 and NE12 above in this regard.



Reference number	Representation	Applicant response
	The BNG Report shows that the on-site proposals deliver a +23.46% area-based habitat gain, and a +58.78% hedgerow gain (no % change for watercourses as it is stated that no watercourses present within the order limits). NSIPs are not yet subject to mandatory BNG requirements; however, the figures presented are above the minimum 10% net gain requirement which is mandatory for most Town and Country Planning Act applications, and this is welcomed by Natural England. We note that the assessment states that there are no watercourses within the order limits, however, it is Natural England's understanding that there are drainage ditches within the development boundary. We therefore recommend that these are considered within the BNG assessment and 10% uplift is also delivered for these habitats (we note that ponds within the order limits have been considered as area units as per The Statutory Biodiversity Metric User Guide). We welcome reference to the Norfolk Local Nature Recovery Strategy (LNRS) within the BNG Report. Projects of this scale can and should make a major contribution to local nature recovery in line with the Lawton principles of 'more, bigger, better and more joined up' habitats¹ in the area. We advise that habitats and species measures within the LEMP and BNG delivery, should be aligned with the published Norfolk LNRS. We consider that such an approach would, following completion of the project, provide significant opportunities for both socio-economic and environmental benefits through: • Enabling wildlife to adapt to the challenges of the future including habitat fragmentation, climate change etc. • Providing a wealth of natural capital benefits such as flood prevention, improved air and water quality, improved soils, increased carbon storage etc. • Providing inspiration and enjoyment for people through regular access to a high-quality natural environment, improving community health and wellbeing (both mental and physical). This should include enhancement of public access where practical (i.e. where it would not compromise the biodiversity interest, for example) and could also involve local stewardship of any new habitat creation. Such an approach would also be in line with: • The Government's 25 Year Environment Plan where delivery of the Nature Recovery Network (NRN) is a central commitment and other Government environment plans • Section 4.6. of Department for Energy Security & Net Zero - Overarching National Policy - Statement for Energy (EN-1) • Paragraphs 187(d), 192 and 193 of the National Planning Policy Framework. • Policy ENV 02 Biodiversity protection and enhancement of Breckland Local Plan 2023 Matters that must be secured in the DCO: Gains can be secured through planning obligations, conservation covenants or requirements within the DCO. Natural England would welcome a commitment in excess of 10%.	



Reference number	Representation	Applicant response
	Risk Red/Amber/Green: n/a	
NE27	NE key issue ref: NE5 Topic: Soils and best and most versatile agricultural land - ES Chapter 11: Soils and Agriculture - Draft Order limits area vs ALC survey area (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: At the PEIR stage we noted a discrepancy between the draft order limits and the ALC survey, and that further clarity was needed, Natural England therefore welcome that in the revised documentation the area in the order limits, now matches the total area in Chapter 11 (~839ha), and it has been clarified that the ALC survey excludes some land (e.g. woodland, roads, , non-agricultural areas. We therefore have no further comments on this, however, note our comments on the national grid infrastructure below. Matters that must be secured in the DCO: Risk Red/Amber/Green: Green	The Applicant welcomes this comment.
NE28	NE key issue ref: NE6 Topic: Soils and best and most versatile agricultural land - ES Chapter 11: Soils and Agriculture - Reversibility Paragraph 11.5.23 (C) – construction phase (O) – operational phase: Natural England's (NE) commentary and advice on: We note that the ES states "Temporary short-term impacts are less significant than temporary long-term impacts." The temporary displacement of soil as a result of the underground cable installation and temporary haul and access roads/construction compounds can result in permanent land quality change and soil damage if undertaken inappropriately. Natural England advise temporary impacts should be considered in the SMP. This is required for consultees and decision makers to understand the extent (ha) and likely long-term impacts on agricultural land quality (ALC grade). Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	Natural England's comments are noted but they are not understood. The assessment set out in the ES Chapter 11: Soils and Agriculture [AS-018] assesses whether impacts are temporary or permanent. Temporary, reversible impacts are defined as low magnitude. If the impacts result in a permanent and irreversible impact, such as by permanent sealing or irreversible down-grading of land quality, they are defined as a permanent impact and will be assessed according to the assessment tables. As described in ES Chapter 11: Soils and Agriculture [AS-018], and as per the principles set out in the oSMP [APP/7.13.1], great care will be taken to ensure that land quality is not permanently affected. Cable woks and haul routes are explicitly covered in the assessment. The Applicant agrees with this comment. The Applicant can confirm that the principles set out in the oSMP [APP/7.13.1] apply to temporary short-term impacts, as well as long-term impacts, on soils and land quality.
NE29	NE key issue ref: NE7 Topic: Soils and best and most versatile agricultural land - ES Chapter 11: Soils and Agriculture - Table 11.3 Methodology for Determining Scale of Effect (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: Table 11.3 applies fixed area thresholds to determine magnitude and significance; however, this approach does not adequately account for circumstances where the extent of impact may be under-recorded or fragmented across multiple land parcels or phases of development. Where impacts are assessed on a parcel-by-parcel or component basis, the resulting magnitude classification may fail to reflect the	Natural England comments that impacts assessed on a parcel-by-parcel or component basis may under-record the magnitude of the combined loss or downgrading effects. ES Chapter 11: Soils and Agriculture [AS-018] assesses the various components of the Scheme at the construction, operation and maintenance, and decommissioning phases. In respect of the construction phase, the effects of the various components are aggregated as part of the assessment. Table 11-7 in ES Chapter 11: Soils and Agriculture [AS-018] provides the total of short-term, long-term and permanent areas disturbed by ALC grade, and the ES assessed the effect of these areas collectively. Therefore, the ES does aggregate all areas of permanent and long-term soil loss across the Scheme. The thresholds for magnitudes set out in Table 11-2 of ES Chapter 11: Soils and Agriculture [AS-018] were carried forward from the PEIR. The ES applies a 20 ha benchmark in that the loss of 20 ha or more of BMV land is a moderate adverse effect, which is significant. The rationale is set out in sections 11.5.12 – 11.5.16 of ES Chapter 11: Soils and Agriculture [AS-018]. The assessment considers whether there are temporary



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	combined loss or downgrading of agricultural land, particularly for BMV soils. In such cases, effects that are individually categorised as medium magnitude may collectively exceed the 20ha threshold identified by Natural England as representing a potentially significant change yet still be recorded as only moderate in scale within the EIA. In addition, the reliance on a >50 ha threshold for high magnitude effects risks understating the significance of permanent sealing or long-term downgrading of BMV land, where even smaller losses may represent a material and irreversible effect on a finite resource. The methodology further allows for scenarios in which the loss of more than 50 ha of BMV land is required before a major effect is identified, which may not align with best practice or regulatory expectations where impacts are permanent and cumulative. To avoid under-recording, the magnitude assessment should explicitly: • Aggregate all areas of permanent and long-term soil loss across the Scheme, • Apply the 20 ha benchmark for BMV land as an indicator of high magnitude where effects are irreversible, and • Ensure that cumulative losses across phases and associated development are captured within a single assessment framework. Without such safeguards, there is a risk that the scale and significance of soil and agricultural land impacts are artificially constrained by threshold definitions, rather than reflecting the true extent and permanence of change. Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	and reversible, or permanent and irreversible (including downgrading of land quality even if the land is not lost) impacts, and quantifies the impacts and determines the effects. This is done for each of the three phases of construction, operation and decommissioning, and then collectively in section 11.10 of ES Chapter 11: Soils and Agriculture [AS-018]. The assessment aggregates all the permanent and long-term impacts in making the assessment and captures these in a single table and assessment. A loss of 20ha or more is defined as significant, which is the threshold for consultation with Natural England. Therefore, the three assessment considerations suggested by Natural England have already been included in the assessment.
NE30	NE key issue ref: NE8 Topic: Soils and best and most versatile agricultural land - ES Chapter 11: Soils and Agriculture – Existing Agricultural Land Quality. Paragraphs 11.6.2 – 11.7.1 (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: Natural England note that the existing baseline conditions of the site are based on "provisional" ALC maps in the 1970s, and that the published provisional map for the East of England shows "the Site to be mostly of undifferentiated Grade 3 with areas of Grade 4, and based on this, "the site was identified as likely to be some of the lowest quality land in the wider area.". It is therefore interpreted that the site location was selected based on the results of the provisional maps. Natural England advise that selecting the site location in the absence of a detailed (un-surveyed land), site-specific soil and ALC survey and assuming that all mapped ALC Grade 3 land is BMV (i.e. Subgrade 3a), it is impossible to provide an accurate baseline and demonstrate the likely potential impacts. So, whilst this may make the mitigation approach appear precautionary, it means that the project is unable to show how it avoids, rather than mitigates impacts to BMV soils nor the design of potential mitigation to safeguard the soil resources. Paragraph 5.11.12 of NPS EN-1 states that Applicants should seek to minimise impacts on BMV agricultural land and preferably use land in areas of poorer quality.	The site evaluation process has been informed by a number of baseline and technical studies, as detailed in Appendix 1: Site Evaluation Report to the Planning Statement [APP/5.5.1]. ALC and land type were an important factor for the Applicant when evaluating the Site. Paragraph 4.4.20 of Appendix 1: Site Evaluation Report states, "Consistent with national policy, the Applicant considered the best and most versatile land based on the available data at the time of the initial site evaluation, which was the Natural England Agricultural Land Classification (ALC) maps". The Applicant further states, in paragraph 4.4.22, "This approach to considering ALC values, in terms of the use of provisional and predictive mapping, has been considered as both satisfactory and proportionate by the Examining Authorities and Secretary of State in relation to, for example, the made Heckington Fen Solar Farm, Gate Burton Energy Park and Mallard Pass Solar Farm DCOs". Additionally, an ALC report, informed by soil samples, was prepared (ES Appendix 11.2: Agricultural Land Classification [APP-168]) and used to inform the siting of infrastructure within the Site, as well as the impact of the Scheme on soils and agricultural land, as assessed in ES Chapter 11: Soils and Agriculture [AS-018]. As noted under NE14, site location using provisional ALC mapping should not be criticised for this given a lack of alternative data availability. As set out in ES Chapter 11: Soils and Agriculture [AS-018] at section 11.7, the provisional mapping shows the Order limits as mostly undifferentiated Grade 3. These maps were produced between 1967 and 1974, as set out in Natural England's TIN049 (see Reference 11-10 in ES Chapter 11: Soils and Agriculture [AS-018]). They were designed to provide general guidance rather than for site-specific use, but equally they are all that is available. Natural England (and its predecessors) have not updated these maps despite the ALC methodology changing (in 1976 and 1988), but they have reprinted them (2010) and digitised them (2017), indicating that Natural England intends them still to be used. These maps were not used by the Applicant in isolation. In 2017, Natural England produced Likelihood of BMV maps. The relevant extract is set out at Plate 11-24 of ES Chapter 11: Soils and Agriculture [AS-018].



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	The ES should quantify the areas of land according to Grades 1 to 5 of the ALC, including differentiating between Grades 3a and 3b. Natural England recognise the Applicant's acknowledgement of the deficiencies within the provisional dataset however, whilst provisional mapping provides an indication of the ALC grade, and thus the potential impact on BMV agricultural land, it does not provide the soil details required to inform soil management which would feed into the Soil Management Plan (para 11.7.3). There is a risk of soil damage, ALC degradation and long term or permanent loss of BMV from cable installation (Para 2.9.26 NPS EN5). Soil will need to be handled according to best practice and reinstated to a high standard to reduce the impacts. The results from a detailed ALC survey would provide soils data to inform a soil management plan for the whole site regardless of whether the use is permanent or temporary in nature. Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	which identifies the Order limits as falling almost fully in the “low likelihood of BMV (<20% area BMV)”. Therefore, the published information showed the Site area as having the lowest proportion of BMV in the wider area. It is noted that the recently published Land Use Framework for England (HM Government, March 2026) introduces some updated mapping for ALC, but this is not yet available. Accordingly, the Applicant utilised the information available at the time (which is still the only information available) prior to field testing Natural England comment that detailed ALC survey is required to inform the assessment and also the oSMP [APP/7.13.1]. Detailed field ALC of the Order limits has been carried out and is reported in ES Chapter 11: Soils and Agriculture [AS-018], with the ALC report included in the DCO Application as ES Appendix 11.2: Agricultural Land Classification [APP-168]. A small part of the Order limits has not been the subject of ALC survey, but this area is included only to allow for the re-stringing of overhead power cables, with no disturbance to soil except for vehicle trafficking. Soil suitability assessments prior to vehicle trafficking is addressed in the oSMP [APP/7.13.1]. The oSMP [APP/7.13.1] is also based on the results of detailed soil and ALC surveys, as set out in that document. Therefore, in summary against each of Natural England's comments: - The provisional ALC maps were used together with the Likelihood of BMV maps, both of which show the Order limits as being the likely poorest land in the wider area - The deficiencies of the provisional maps are fully recognised which is why land quality has been assessed by way of a detailed ALC survey (which took place over 28 man days in 2024) and the results are set out in ES Chapter 11: Soils and Agriculture [AS-018] and ES Appendix 11.2: Agricultural Land Classification [APP-168] - It is recognised that the provisional ALC maps do not provide the information about soils needed for the oSMP [APP/7.13.1] which is why a detailed ALC, which took place over 28 man days in 2024, has been completed and is reported in the ES. This detailed soil information, taken from a total of 830 soil inspection sites plus 26 pits, has been used in preparation of the oSMP [APP/7.13.1]; and - The assessment differentiates between temporary impacts and permanent impacts, following the methodology set out in ES Chapter 11: Soils and Agriculture [AS-018].
NE31	NE key issue ref: NE9 Topic: Soils and best and most versatile agricultural land - ES Chapter 11: Soils and Agriculture - Table 11.4 ALC Survey Results of the Site and Table 11-7 Areas Disturbed by ALC Grade (C) – construction phase (O) – operational phase: Natural England's (NE) commentary and advice on: The figures presented in Table 11.4 indicate that Best and Most Versatile (BMV) agricultural land represents approximately 54% of the total order limits area, with 38ha potentially being disturbed, and potentially 8.8 ha being permanently lost. This proportion highlights the predominance of high-quality, finite agricultural land within the Scheme footprint, reinforcing the need for careful assessment of both magnitude and significance of soil and land use impacts. Given that BMV land is a high-sensitivity receptor, even relatively small areas of permanent land take or long-term downgrading could constitute a significant effect, particularly when considered cumulatively with other developments. The high proportion of BMV land within the order limits area underlines the importance of applying Natural England's guidance regarding thresholds for significant loss (20 ha or more), and ensuring that mitigation,	The approach set out in Natural England's comment is the approach adopted in the Applicant's assessment of impacts and effects as set out in ES Chapter 11: Soils and Agriculture [AS-018]. The loss from sealing or permanent downgrading of 20ha or more is identified in the ES as a significant adverse effect, such that any loss that exceeds the threshold for consultation with Natural England is a significant effect. The siting of the fixed equipment was determined following consideration of multiple factors, environmental and operational, including land quality. ES Chapter 11: Soils and Agriculture [AS-018] sets out the effects on land quality and soils resulting from the illustrative layout. A small part of the Order limits (relating to the Grid Connection Infrastructure) has not been the subject of an ALC survey, but this area is included only to allow for the re-stringing of overhead power cables, with no disturbance to soil except for vehicle trafficking. Soil suitability assessments prior to vehicle trafficking are secured in the oSMP [APP/7.13.1]. As there will be no soil disturbance there is no potential for adverse effects on soil or land quality, other than vehicle traffic (as is the case now from farm activities). As set out in the oSMP [APP/7.13.1], vehicular activity will be limited to periods when the soils are sufficiently dry for adverse effects not to occur. The ALC survey was undertaken at an early stage in the overall assessment, and the results including the distribution of the grades and the location of the BMV land, was used in the design process and in micro-siting, and was assessed against the many other operational and environmental considerations in deciding



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	reinstatement, and cumulative assessment measures are clearly presented and robustly justified. We advise that our comments from the PEIR stage still stands that BMV agricultural land is avoided for the siting of permanent infrastructure and the ALC survey data is used for the purposes of micro-siting. Natural England note that the ALC survey does not include all of the Grid Connection Infrastructure, however, it is not clearly stated within the ES why this area has not been included in the ALC survey. Whilst it is noted that the ES states, “Potential temporary working area for grid connection infrastructure within the Order limits is required temporarily for overhead cabling works, with no permanent land take.” Clarity is needed as to whether this is in reference to the non-surveyed grid connection infrastructure. We refer you to our advice in NE5 in relation to potential impacts from temporary works. Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	the overall best layout. BMV land has been avoided so far as possible, in the overall design, and the effects limited so far as possible.
NE32	NE key issue ref: NE10 Topic: Soils and best and most versatile agricultural land - ES Chapter 11: Soils and Agriculture - BESS levelling works – Paragraph 11.8.36 (C) – construction phase (O) – operational phase: C, O Natural England’s (NE) commentary and advice on: The ES notes that detailed levelling works have not yet been developed, and a worst-case assessment of up to 10.5 ha of topsoil and subsoil movement has been adopted. While this approach is appropriate at the preliminary stage, the assessment does not explicitly consider the sensitivity of the soils affected, including their Agricultural Land Classification (ALC) grade or Best and Most Versatile (BMV) status, nor does it distinguish between temporary disturbance and permanent land quality downgrading. The reliance on future mitigation through an outline Soil Management Plan (oSMP) is noted, but until detailed methods for soil stripping, storage, handling, and reinstatement are defined, there remains uncertainty regarding the effectiveness of mitigation and the potential magnitude of impact. Given the finite and high-value nature of BMV soils, even relatively small areas of permanent loss or long-term degradation may constitute a significant effect, particularly when considered cumulatively with other elements of the Scheme. For a robust and transparent assessment it is recommended that: (i) the sensitivity of soils be clearly identified using ALC and soil function frameworks, (ii) temporary and permanent impacts be assessed separately, (iii) the spatial extent of impacts be reviewed to ensure all affected areas are included, and (iv) mitigation and monitoring measures are fully specified within the final Soil Management Plan to support a defensible evaluation of significance. Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	Natural England’s recommendations i) to iii) are already addressed in ES Chapter 11: Soils and Agriculture [AS-018]. The ES is based on the results of detailed ALC and soil surveys. ES Chapter 11: Soils and Agriculture [AS-018] assesses the various components of the Scheme at construction, operation and maintenance and decommissioning phases, assessing temporary and permanent effects separately and then assessing the effects of the Scheme on an aggregated basis. Table 11-7 in ES Chapter 11: Soils and Agriculture [AS-018] provides the total of short-term, long-term and permanent areas disturbed by ALC grade, and the ES assessed the effect of these areas collectively. Therefore, the ES does aggregate all areas of permanent and long-term soil loss across the Scheme to include all affected areas are included. Mitigation and monitoring measures are set out in the ES Chapter 11: Soils and Agriculture [AS-018] and in the oSMP [APP/7.13.1]. Natural England's comments that the BESS works and assessment does not identify the ALC grade are rebutted. Plate 11-34 of ES Chapter 11: Soils and Agriculture [AS-018] shows an excerpt from the plans for the BESS, Customer Substation and National Grid Substation. Plate 11-33 shows the detailed ALC results for the same area, with the ALC grade clearly identified. Paragraph 11.8.42 quantifies the land quality losses in Field 27. Table 11-7 sets them out collectively with the other impacts on land quality, recording both quantum and quality. A worst case and likely assessment is made in ES Chapter 11: Soils and Agriculture [AS-018]. In respect of the recommendations for a robust assessment: (i) The sensitivity of the soils has been assessed by soils type and ALC grades and the information is set out in detail in the ES and the ALC report (ii) Temporary and permanent effects are assessed separately and are clearly distinguished in the tables and assessment in ES Chapter 11: Soils and Agriculture [AS-018] (iii) All areas have been considered and the spatial extents are set out in detail (iv) Mitigation is set out in the E ES Chapter 11: Soils and Agriculture [AS-018] and an outline of the requirements for the detailed Soil Management Plan are set out in oSMP [APP/7.13.1].



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NE33	NE key issue ref: NE11 Topic: Soils and best and most versatile agricultural land - ES Chapter 11: Soils and Agriculture - Section 11.11 Cumulative Effects Assessment (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: We note that the cumulative assessment of the ES appears to only consider developments of a similar type or sector. In accordance with the Planning Inspectorate's guidance Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment, the cumulative assessment of impacts on soils and agricultural land should consider all relevant plans and projects within the defined Zone of Influence at the county level, rather than being limited to developments of a similar type or sector. While large-scale solar and energy schemes are a key source of cumulative agricultural land loss, other forms of development including housing allocations, employment land, mineral extraction, transport infrastructure, flood management schemes, and strategic land-use changes identified in adopted and emerging plans can also contribute materially to cumulative effects on finite soil resources. The guidance requires that a long list of plans and projects be established and then filtered using transparent, receptor-specific criteria (such as scale of land take, permanence of soil loss, and temporal overlap), rather than pre-screening by development type alone. Restricting the cumulative assessment to similar developments risks under-recording the true extent of cumulative soil and agricultural land loss, particularly where incremental losses from diverse sources combine to exceed recognised significance thresholds, including those identified by Natural England for Best and Most Versatile land. A county-wide, plan-led approach is therefore necessary to ensure that cumulative effects on soils and agriculture are comprehensively, proportionately, and defensibly assessed. Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	The assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations⁷ and the Planning Inspectorate's advice note on Cumulative Effects Assessment⁸. The approach to cumulative assessment is detailed in ES Chapter 2: EIA Process and Methodology [APP-051] and ES Appendix 2.4: Cumulative Schemes [APP-136]. Cumulative assessments within each of the technical topic chapters have been undertaken in accordance with the relevant topic specific guidance and best practice approach, assessing a reasonable worst-case scenario. ES Appendix 2.4: Cumulative Schemes [APP-136] presents the methodology for selecting cumulative schemes, as well as presenting the schemes considered for assessment as part of the cumulative effects assessment within the ES. As per ES Appendix 2.4: Cumulative Schemes [APP-136], the search for cumulative schemes was not limited to developments of a similar type or sector; the 'long list' of cumulative schemes was undertaken using the following criteria: • Within the Zone of Influence • Meets thresholds for EIA Development • Developments currently not yet complete and operational (reasonable effort has been made to determine this from publicly available online sources) • Local and regional authority applications with extant permission (cases since 31/01/2020) • Development listed on the National Infrastructure Planning online map • Strategic developments identified in the relevant Development Plan (and emerging Development Plans); and • Development identified in other plans and programmes which set the framework for future development consents/approvals, where such development is reasonably likely to come forward. The long list of cumulative schemes was discussed with the Local Planning Authorities and finalised for assessment in the ES. On a topic-by-topic basis, the cumulative schemes with the potential for in-combination effects have been identified by the technical author and assessed within each technical ES chapter. The cumulative assessment within ES Chapter 11: Soils and Agriculture [AS-018] has been undertaken in accordance with the methodology set out in ES Appendix 2.4: Cumulative Schemes [APP-136]. Table 2.2 of ES Appendix 2.4: Cumulative Schemes [APP-136] details, for soils and agriculture, the rationale for considering only NSIP developments in the cumulative effects assessment: <i>"For cumulative developments which are allocated through local policy, or where planning consent has been granted, the resultant loss of any BMV land has been accepted in planning terms and therefore considered as part of the baseline environment. Therefore, it is not considered necessary to consider cumulative effects on BMV agricultural land from allocated or approved cumulative developments which are not NSIPs in Norfolk are not considered further in the cumulative effects assessment on BMV agricultural land."</i>
NE34	NE key issue ref: NE12 Topic: Soils and best and most versatile agricultural land – Appendix 11.1: Consultation and Legislation, Planning Policy and Guidance-Paragraph 11.2.3 (C) – construction phase (O) – operational phase: C, O	The updated NPS EN-1 (2025) was published following the submission of the DCO Application. The Applicant notes that the Scheme is to be examined in accordance with the previous suite of NPS documents from 2023, rather than the latest versions. However, the latest versions are capable of being a relevant consideration in the Examination and therefore the Policy Compliance Document [APP/5.6.1] references will be updated, but in respect of agricultural land and soils the policy has not changed significantly.

⁷ HM Government, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

⁸ Planning Inspectorate, Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (September 2024)



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	Natural England's (NE) commentary and advice on: Please note that updated National Policy Statement for energy infrastructure have now been published in January 2026 (following the publication date of the ES). The revised version reflects the Government's current strategic priorities and policy direction, and it supersedes the previous version with immediate effect. Stakeholders are advised to review the updated statement in full, as it may have implications for ongoing and future activities, decision-making processes, and compliance obligations within the relevant policy framework. Matters that must be secured in the DCO: Risk Red/Amber/Green: Green	
NE35	NE key issue ref: NE13 Topic: Soils and best and most versatile agricultural land – Appendix 11.1: Consultation and Legislation, Planning Policy and Guidance-Paragraph 11.2.14 (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: The Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land, published by the Welsh Government and Defra in December 2025, provides an update of the 1988 MAFF Guidelines: 'The revised criteria for grading the quality of agricultural land using the Agricultural Land Classification of England and Wales' The British Society of Soil Science has published the Guidance Note Benefitting from Soil Management in Development and Construction which also contains useful guidance. Please be advised that the Institute of Environmental Management and Assessment (2022) A New Perspective on Land and Soil in Environmental Impact Assessment has now been supplemented by new Institute of Sustainability and Environmental Professionals (ISEP) guidance. In December 2025 ISEP published an advice note titled 'Solar PV on Agricultural Land: Essential Components of Environmental Assessments and Reports', which offers expanded direction on balancing renewable energy development with the protection of agricultural land and soil health, including clear expectations for soil and Agricultural Land Classification surveys, biodiversity net gain, pollution risk management, and socio-economic analysis. The advice note is designed to support consistent, evidence-based decision-making by environmental consultants, developers, and planning authorities. Additionally a new ISEP advice note, 'Soil Health in Environmental Assessments and Reports', provides a practical framework for assessing development impacts on soil health and is intended to complement the 2022 land and soil guidance by expanding on the assessment of biological and chemical soil properties alongside physical soil functions. Matters that must be secured in the DCO: Risk Red/Amber/Green: Green	The Applicant notes these documents. Three of these post-date the publication of the ES. All have been reviewed and the assessment process covers matters raised and is compliant with the latest guidance. The ALC updates do not alter the ALC results. The British Society of Soil Science Guidance is referred to in paragraph 2.2 of the oSMP [APP/7.13.1].



Reference number	Representation	Applicant response
NE36	NE key issue ref: NE14 Topic: Soil Management Plan (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: Natural England welcomes the outline Soil Management Plan and it sets out appropriate principles, however, several sections of the document remain high-level, and therefore at this stage it does not provide the assurance needed that soil resources—especially BMV land—will be protected. Natural England advise the submitted Outline Soil Management Plan (SMP) is not considered adequate to support the conclusions of the ES because it omits key elements necessary to demonstrate that soil resources, including any BMV land, can be appropriately protected and restored. In particular, the absence of defined soil handling methodologies (stripping, storage and reinstatement), construction-phase monitoring procedures (including roles and responsibilities), restoration and aftercare measures, soil amelioration commitments, and operational monitoring means there is insufficient evidence that temporary impacts will be reversible or that pre-development agricultural land quality can be reliably reinstated. Without these framework controls established at outline stage, the assessment relies on mitigation that is neither described nor secured in principle. As such, the current Outline SMP does not provide a robust basis for concluding that significant adverse effects on soil and agricultural land can be avoided or reduced, and further detail is required to substantiate the impact assessment. Key elements such as soil handling methods, stockpile design, reinstatement techniques, moisture-condition controls, and construction-phase monitoring are described only in general terms, with critical details deferred to a later "detailed SMP". The plan also lacks measurable reinstatement criteria and aftercare for all land to be restored, site-specific protection measures for sensitive soil types, and clear procedures for high-risk areas such as BESS levelling, cable trenches and decommissioning. As a result, Natural England advise that it is not possible to determine whether soil structure, function and agricultural land quality can be preserved or restored, and a more detailed SMP will be essential prior to commencement. Natural England would expect these points to be addressed in the detailed SMP and secured through a DCO requirement. Matters that must be secured in the DCO: Natural England would advise that a SMP is secured through a DCO requirement. Risk Red/Amber/Green: Amber	The knowledge of the soils and land quality, soil depth and properties, construction methods and likely impacts are all understood sufficiently to enable a thorough and robust assessment of the impacts and effects, as set out in ES Chapter 11: Soils and Agriculture [AS-018]. The Applicant notes that it has followed standard and well-precedented procedure in relation to the level of detail contained in the oSMP [APP/7.13.1]. The Applicant does not agree that the oSMP [APP/7.13.1] is inadequate to support the conclusions of the ES. Natural England comments that it expects greater details to be set out in a detailed Soil Management Plan, to be secured through a DCO requirement. This is also the Applicant's expectation, as set out in paragraphs 1.1 to 1.3 of the oSMP [APP/7.13.1]. The Applicant is required, under Requirement 17 of Schedule 2 of the draft DCO [APP/3.1.1], to produce a detailed Soil Management Plan that is substantially in accordance with the oSMP [APP/7.13.1]. The oSMP [APP/7.13.1] provides the key principles and follows the assessment in ES Chapter 11: Soils and Agriculture [AS-018]. The oSMP [APP/7.13.1] does not need to be written in advance of the assessment. It is a tool for management to ensure that mitigation takes place against potential adverse effects identified in the assessment, and as such does not and is not intended to provide the basis for the assessment of effects. As Natural England note, and the Applicant agrees, a detailed Soil Management Plan will be essential prior to commencement and will be a requirement of the DCO.
NE37	NE key issue ref: NE15 Topic: Ancient woodland and ancient/veteran trees (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: Natural England note that Chapter 7 of the Environment Statement has identified veteran trees within or adjacent to the order limits of the proposed development.	The Applicant refers to its response to NE17 above in this regard. The Applicant also notes that the oCEMP [APP/7.6.1] is secured via Requirement 13 of Schedule 2 of the draft DCO [APP/3.1.1].



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	Ancient woodland and ancient and veteran trees are considered irreplaceable habitat and are protected in the National Planning Policy Framework. We welcome that the retention of these trees has been designed into the proposal, and these features will be protected throughout the lifetime of the development. For further advice in relation to working around ancient woodland and ancient and veteran trees when preparing mitigation measures, we advise the Applicant to refer to the standing advice produced by Natural England and the Forestry Commission, and we would advise that this guidance is referenced specifically within the LEMP. Matters that must be secured in the DCO: The CEMP and the measures within to ensure strict protect veteran and ancient trees should be secured, including a full BS5837:2012-compliant arboricultural survey pre-construction, strict Root Protection Area protection, arboricultural clerk of works oversight, no-dig methods, soil compaction prevention, dust/runoff control, micro-siting, and a prohibition on removal. Risk Red/Amber/Green: Green	
NE38	NE key issue ref: NE16 Topic: Outline Landscape and Ecological Management Plan - Norfolk LNRS - 7.2.3–7.2.19 (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: The oLEMP references the draft Norfolk LNRS and uses it to guide habitat creation, hedgerow enhancement, woodland establishment, and ecological connectivity. Now that the final LNRS is published, Natural England advises updating the LEMP so that all habitat and connectivity proposals align with final LNRS opportunity maps and priority actions, particularly in relation to: • Lawton Zones • Areas of Potential Importance for Biodiversity • Priority habitat expansion zones within the Brecks and Nar Valley Updating to the final LNRS version will ensure maximum strategic alignment and optimise biodiversity benefit. Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	The Applicant notes this comment and is pleased to confirm the oLEMP [APP/7.11.1] has been updated at Deadline 1 to reflect the published Norfolk LNRS, including in particular in relation to Priority habitat expansion zones within the Brecks and Nar Valley.
NE39	NE key issue ref: NE17 Topic: Outline Landscape and Ecological Management Plan - BNG & Monitoring - 7.2.48–7.2.50; Table 7-1 (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: Natural England welcomes the significant BNG uplift demonstrated in the oLEMP: • +23.46% area-based habitat units	None of the ditches within the Site were recorded to be of sufficient size, nor hold water for sufficient time to qualify under the definition of a watercourse ditch set out within standard Biodiversity Net Gain guidance (Defra (Feb 2024) The Statutory Biodiversity Metric – User Guide, updated Juuly 2025). Accordingly, they have not been included within the Biodiversity Net Gain Assessment Report [APP/7.4.1]. Relevant criteria for successful achievement of the BNG outcome in relation to the BNG metric (as set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1]) are provided by the criteria set out within The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology (Defra , 2025). Nonetheless, in line with Natural England's advice, further information in regard to measures and



Reference number	Representation	Applicant response
	+55.32% hedgerow units This exceeds the indicative 10% requirement and is strongly supported. However, Natural England advises that measurable success criteria should be provided within the detailed LEMP, including: - Target condition assessments for each UKHab habitat. - Quantified targets for hedgerow condition and tree establishment. - Defined remedial triggers if habitat creation underperforms during the first five years of monitoring. As per our comments for NE4, it is Natural England's understanding that there are drainage ditches within the development boundary. We therefore recommend that these are considered within the BNG assessment and LEMP. Matters that must be secured in the DCO: Risk Red/Amber/Green: n/a	remedial triggers will be provided within the detailed Landscape and Ecological Management Plan, as secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.1].
NE40	NE key issue ref: NE18 Topic: Outline Landscape and Ecological Management Plan - Grassland Creation and Soil Management - 7.3.58–7.3.90 (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: The oLEMP proposes extensive species-rich grassland creation across open fields, field margins and beneath/around Photovoltaic arrays. This is welcomed; however, key risks relate to establishment on nutrient-rich arable soils. Natural England advises: - Defined seed provenance commitments favouring local or regional sources. - Clear contingency actions if meadow establishment fails (e.g., re-seeding, additional cut-and-collect cycles). These measures will reduce risks of poor sward development on previously arable soils. Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	Design Principles in relation to ongoing management measures are secured in the oLEMP [APP/7.11.1]. In particular the limitations and risks associated with establishment of species-rich grassland on nutrient-rich arable soils is acknowledged (and reflected within the targeted habitat and condition criteria set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1]. Nonetheless, measures such as those suggested by Natural England will be incorporated, whilst contingency actions will be set out within the detailed Landscape and Ecological Management Plan (and in order to ensure the Scheme achieves the required BNG outcomes), as secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.1].
NE41	NE key issue ref: NE19 Topic: Outline Landscape and Ecological Management Plan - Woodland, Hedgerow and Scrub Establishment - 7.3.20–7.3.39; 7.3.43–7.3.57; 7.4.10–7.4.37 (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: The retention of existing wooded features and the creation of new woodland belts, hedgerow planting, and scrub enhancement is welcomed and aligns with LNRS and Biodiversity Action Plan policies. Natural England advise the following:	The Applicant notes this comment and confirms (in line with paragraph 7.3.46. within the oLEMP [APP/7.11.1], and as highlighted by Natural England, that hedgerow cutting will be scheduled to avoid the bird nesting season. Detailed timings/schedules would be anticipated to be included within the detailed Landscape and Ecological Management Plan, as secured through Requirement 7 in Schedule 2 to the draft DCO [APP/3.1.1]. It is also confirmed (as detailed within the Biodiversity Net Gain Assessment Report [APP/7.4.1] and associated statutory metric), that hedgerow removal for access/visibility splays has been taken into account and fully compensated, with a resulting calculated net gain in hedgerow units, including as secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.1].



Reference number	Representation	Applicant response
	- Assurance that hedgerow cutting avoids the bird nesting season March–August (paras 7.3.45–7.3.47) - Confirmation that hedgerow removal for access/visibility splays will be fully compensated where possible. These details will ensure the hedgerow network functions as a consistent ecological corridor. Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	
NE42	NE key issue ref: NE20 Topic: Outline Landscape and Ecological Management Plan – Priority and Protected Species (Curlew, Skylark, Bats) - 7.3.95–7.3.104 (C) – construction phase (O) – operational phase: C, O Natural England’s (NE) commentary and advice on: Natural England supports the provision of: 8.8 ha Curlew mitigation grassland, with grazing excluded during nesting seasons. 80 ha Skylark mitigation using 2 plots/ha in cereal crops. However, we advise more detail is required on: - predator-exclusion measures for the curlew mitigation grassland (para 7.3.101) - Monitoring outcomes (e.g., target number of successful nests). - Delivery of mitigation for the full 60-year operational lifespan. In relation to bats, we recommend a detailed lighting strategy (if proposed) to ensure compliance with best-practice bat-sensitive lighting guidance, especially given presence of priority species such as Barbastelle. Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	The Applicant welcomes Natural England’s support for the Curlew and Skylark mitigation land. Design Principles in relation to ongoing management measures are secured in the oLEMP [APP/7.11.1]. Specific predator-exclusion measures would be anticipated to include secure fencing, further details of which, along with monitoring measures would be set out within the detailed Landscape and Ecological Management Plan, as secured through Requirement 7 in Schedule 2 to the draft DCO [APP/3.1.1] (including delivery of relevant mitigation for the duration of the operational lifespan). On the lighting point, the Design Principles, Parameters and Commitments [APP/5.8.1] confirms that “<i>The Solar arrays will not be lit during the operational phase</i>”, such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects are set out within the oCEMP [APP/7.6.1].
NE43	NE key issue ref: NE21 Topic: Outline Landscape and Ecological Management Plan - Public Rights of Way (PRoW) and Recreational Access - 7.2.51– 7.2.57 (C) – construction phase (O) – operational phase: C, O Natural England’s (NE) commentary and advice on: Natural England welcome the commitment to retain all PRoWs and introduce 3.5 km of permissive paths (“Swaffham Link”). However, Natural England advises care that interpretation boards and increased visitor access does not inadvertently draw recreational pressure toward sensitive habitats. Matters that must be secured in the DCO: Risk Red/Amber/Green: Green	The management and mitigation measures set out within the oLEMP [APP/7.11.1] and oPRoWPPMP [APP-192] will be secured by way of requirements in the DCO and will ensure that any recreational pressure on habitats within the Site is appropriately mitigated. This will include regular monitoring and review of the onsite habitats to ensure there are no adverse effects from additional recreational or visitor demand. In the event there are adverse effects, suitable mitigation will be implemented, such as remediation measures, to restore any habitats. The addition of the permissive paths within the Site will create a circular route, which connect into the existing PRoW network to the north of Swaffham, and provide greater access to the countryside to the north of Swaffham. The provision of the permissive paths within the Site does not materially shorten the walking distance between Swaffham and the sensitive designations located along the Nar Valley, which are currently accessed via existing PRoWs NK/WestAcre/RB7, Petticoat Drove and NK/SouthAcre/RB7. The installation of interpretation boards will provide an opportunity to provide educational information about sensitive habitats



Reference number	Representation	Applicant response
		within and beyond the Site. The Applicant therefore considers that the provision of permissive paths is unlikely to inadvertently increase recreational pressure toward these sensitive habitats.
NE44	NE key issue ref: NE22 Topic: Outline Landscape and Ecological Management Plan – Long term management - 7.5.1–7.5.4 (C) – construction phase (O) – operational phase: C, O Natural England's (NE) commentary and advice on: Natural England supports the outline monitoring framework, including UKHab surveys, quadrats, soil testing, bird and bat monitoring. To ensure ecological success, the detailed LEMP should include: - Quantifiable habitat performance indicators. - Trigger points requiring corrective action. - Commitment to long-term monitoring (beyond first five years). - Clear allocation of responsibilities between the Drove Solar Farm Limited and National Grid for substation planting and ongoing maintenance. Matters that must be secured in the DCO: Risk Red/Amber/Green: Amber	Quantifiable habitat performance indicators are already provided by the provided by the habitat condition criteria set out within The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology (Defra , 2025), with the targeted habitat and condition set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1] and associated metric. Similarly trigger points requiring corrective action in regard to habitats would be represented by failure to reach the required condition. Nonetheless, measures such as those suggested by Natural England will be incorporated (including in particular specific monitoring commitments and trigger points, along with clear allocation of responsibilities between the Applicant and National Grid in regard to planting and ongoing maintenance) will be set out within the detailed Landscape and Ecological Management Plan (and in order to ensure the Scheme achieves the required BNG outcomes), as secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.1].
NE45	Natural England's Relevant Representations Part III: Natural England's detailed comments on the DCO and associated documents Page: 44 DCO Ref: 7 Natural England's Comments: <u>Landscape and ecological management plan</u> Natural England welcomes Requirement 7 but advise it should explicitly secure management, monitoring and maintenance of all landscape and ecological measures for the full operational lifetime of the development. This should include long-term habitat performance indicators and remedial actions to ensure delivery of the outcomes set out in the LEMP. Risk (Red/Amber/Green): Green	Ongoing management measures are secured in the oLEMP [APP/7.11.1], which has been updated at Deadline 1 to include specific reference to secure the management, monitoring and maintenance of all landscape and ecological measures for the full operational lifetime of the Scheme, along with the identification of long-term habitat performance indicators and remedial actions, details of which will be set out within the detailed Landscape and Ecological Management Plan, as secured through Requirement 7 in Schedule 2 to the draft DCO [APP/3.1.1].
NE46	Page: 44 DCO Ref: 8 Natural England's Comments: <u>Biodiversity net gain</u> Natural England welcomes the BNG requirement and the commitment to a minimum 10% uplift, but we would encourage securing an uplift to the level demonstrated in	Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], using the Government metric and associated guidance, which demonstrates that the Scheme will deliver 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. In line with BNG guidance it is proposed that management measures are maintained for at least 30 years. Design Principles in relation to ongoing management measures are secured in the oLEMP [APP/7.11.1], which has been updated at Deadline 1 to include specific reference to secure the management, monitoring and maintenance of all landscape and ecological measures for the full operational lifetime of the Scheme, along with the identification of long-term habitat performance indicators and remedial actions, details of which



Reference number	Representation	Applicant response
	the submitted BNG assessment. We also advise created habitats are maintained for at least 30 years or the full operational life. Risk (Red/Amber/Green): n/a	will be set out within the detailed Landscape and Ecological Management Plan, as secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.1].
NE47	Page: 45 DCO Ref: 11 Natural England's Comments: <u>Surface and foul water drainage</u> Natural England advises that Requirement 11 must explicitly secure ongoing SuDS operation, inspection and maintenance for the lifetime of the development to ensure continued protection of the River Nar SSSI. Risk (Red/Amber/Green): Amber	The Applicant notes that Requirement 11 of Schedule 2 of the draft DCO [APP/3.1.1] requires the Applicant to submit written details of the surface water drainage scheme and (if any) foul water drainage system. The ongoing maintenance of the SuDS network is secured through the oOEMP [APP/7.8.1] which states that the SuDS network will have <i>"Regular recording of compliance in a logbook. The detailed OEMP will detail the frequency"</i>. A maintenance scheme for all drainage infrastructure will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within section 2.14 of the oOEMP [APP/7.8.1].
NE48	Page: 45 DCO Ref: 13 Natural England's Comments: <u>Construction environmental management plan</u> Natural England welcomes Requirement 13 but advise clarifying that all CEMP measures apply throughout the full construction period, and that SuDS measures must be maintained for the lifetime of the development to protect sensitive waterbodies such as the River Nar SSSI. Risk (Red/Amber/Green): Amber	ES Appendix 12.2: Flood Risk Assessment [AS-053] states that SuDS features are secured and maintained for the 60-year lifetime of the Scheme, as outlined in paragraph 12.4.32. The measures will apply for the whole duration of the construction phase and the oCEMP [APP/7.6.1] outlines that <i>"The appointed contractor(s) will be responsible for working in accordance with the environmental controls documented in this oCEMP, pursuant to the DCO"</i>. This establishes a binding obligation on Contractors to apply the measures for as long as construction is underway under the DCO.
NE49	Page: 46 DCO Ref: 17 Natural England's Comments: <u>Soil management</u> Natural England welcomes Requirement 17 but advises the require be explicit in ensuring no soil-disturbing works proceed until a detailed SMP is approved, reflecting the outline SMP and Natural England's advice on soil protection, handling, reinstatement and monitoring, especially given the extent of BMV land. Risk (Red/Amber/Green): Amber	The Applicant notes and agrees with this comment. Requirement 17 is a pre-commencement requirement in the draft DCO [APP/3.1.1].
NE50	Appendix 1 - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs) Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should be taken as Natural England's formal representation. This standard advice is applicable to all stages of the NSIP process and may be used by the applicant for NSIP pre application stages, by the Examining Authority (ExA) during the statutory stages of the NSIP and by the relevant Secretary of State as the competent authority.	As noted in the Applicant's response to NE9 above, an air quality assessment on ecological impacts was scoped out of the ES, as agreed with PINS within ES Appendix 2.2: Scoping Opinion Response [APP-134] at ID 3.5.3. Therefore, Natural England's guidance on this matter is not relevant.



Reference number	Representation	Applicant response						
NE51	Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.	The Applicant refers to its response to NE48 above.						
NE52	This includes advice on information that is required to assess this and how to interpret the results of air quality modelling for the decision maker to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.	The Applicant refers to its response to NE48 above.						
NE53	Air pollutants This advice covers the following air pollutants from the construction, operation and decommissioning phases of a proposal • ammonia (NH₃) • nitrogen oxides (NO, NO₂ or NO_x) • nitrogen deposition • acid deposition • sulphur dioxide (SO₂) Standing advice on air pollution and development is also available here: https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities Whilst the standing advice does not cover NSIPs, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken to assess air quality impacts on protected sites. The applicant should provide their own assessment containing the information and detailed modelling you need. You need to review this and make your own conclusion.	The Applicant refers to its response to NE48 above.						
NE54	Table 1: Sequential approach to air quality assessments <table><tr><th>Stage</th><th>Step</th><th>Supplemental evidence/ basis for judgment</th></tr><tr><td>Initial screening for credible risk of an effect</td><td> 1 Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required </td><td>The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features.</td></tr></table>	Stage	Step	Supplemental evidence/ basis for judgment	Initial screening for credible risk of an effect	1 Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required	The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features.	The Applicant refers to its response to NE48 above.
Stage	Step	Supplemental evidence/ basis for judgment						
Initial screening for credible risk of an effect	1 Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required	The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features.						



Reference number	Representation			Applicant response
			Please see Table 2 for industrial air pollution screening distances. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option	
		2	Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src/ Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature. The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View, alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads). If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.	
	Detailed AQ modelling	3	Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Air Quality modelling should include relevant scenarios that are clearly identified.	



Reference number	Representation			Applicant response
			Dispersion Modelling System (ADMS) Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, a construction year, and future operational year(s), do nothing (without proposal), do something (with proposal); taking into account background trends for each pollutant). For proposals that will emit pollutants from a point source, it is helpful to provide isopleths of the dispersion modelling results, showing the predicted contours of pollutant concentration and deposition of the development. These may be assessed against the locations of protected sites and sensitive features within those sites. At least 3 years of meteorological data should be included within the AQ modelling for sources other than for road transport modelling The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf	
	Applying screening thresholds	4a	Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5 Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the annual averages. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment	



Reference number	Representation			Applicant response
			Level, Critical Level or Critical Load), the emission is not likely to have a significant effect alone irrespective of the background levels.	
		4b Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5 Applicants might use the Joint Nature Conservation Committee (JNCC) 'decision-making thresholds' as a reason for not completing an in-combination assessment. If so, you should check they have correctly followed the JNCC guidance on decision-making thresholds. If this guidance shows they do not need to complete an in-combination assessment, continue to step 5. If applicants have not used the decision-making thresholds, or have not followed them correctly, they will need to provide an in-combination assessment.	Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination If the combined process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect in-combination irrespective of background levels.	
	Detailed Assessment of	5	This step is to consider the ecological impacts of AQ on the interest features of the designated site and is	
			The following information is likely to be helpful for the decision maker:	



Reference number	Representation				Applicant response
	ecological impacts		not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the decision maker to determine if there would be an adverse effect on a SSSI. If Habitats Sites are impacted by the proposals, move to Step 6.	Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Habitats that have already been subject to high background nitrogen deposition can develop tolerance to further deposition. This cannot be used to justify further exceedance as it would undermine conservation objectives to reverse decline. You should consider predicted effects on the species richness of a habitat against the site's conservation objectives.	
	Appropriate Assessment (AA) for habitats sites	6	The competent authority to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOL) of habitats sites. Any mitigation proposed should also be assessed at this point. Should the AA conclude that the proposal would have an AEOL that cannot be excluded with mitigation measures, consider the derogation route of the HRA process. Should compensation measures be required under derogation, please	Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the project (ie construction, operation and decommissioning where relevant). To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient duration. The assessment of such measures should be supported by evidence. When deciding on whether the proposals set out in the NSIP will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and	



Reference number	Representation			Applicant response
		contact Natural England for specific advice. Note: If an AA has been undertaken of the proposals alone and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.	
NE55	Mitigation measures If you cannot conclude there is no adverse effect, the applicant will need to apply mitigation measures. Measures will only be appropriate if you can quantify their effectiveness in reducing emissions on the protected site. You should check that mitigation measures are in place to avoid adverse effects on site integrity over the lifetime of the project.			The Applicant refers to its response to NE48 above.
NE56	Mitigation may include measures that: - the applicant volunteers - you impose through formal conditions or restrictions in any permission or authorisation – these may be different or stricter measures than ones proposed by the applicant Examples could include: - relocation or redesign of developments to avoid impacts on protected sites - control of other emissions of the same pollutants with an overlapping effect - a change in stack height for industrial processes - Euro 6 standards for construction machinery - adding wooded shelterbelts, trees, green walls and hedges to limit dispersal of emissions, as long as these measures in themselves would not negatively impact the protected site			The Applicant refers to its response to NE48 above.
NE57	Additional advice Common Standards Monitoring⁷ is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact. ⁷ HYPERLINK "https://jncc.gov.uk/our-work/common-standards-monitoring/"			The Applicant refers to its response to NE48 above.



Reference number	Representation	Applicant response
NE58	For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. where the main source of background exceedance is due to agriculture, but the proposal is an industrial project). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels. You must determine if there is evidence that the increased emissions represent a measurable risk and could compromise the strategic initiatives. You would need to consider information on: - the extent to which any declining national trends in air pollution, or strategic initiatives to tackle emissions affecting the site more locally, might otherwise lead to improvements - the rate at which such improvements are anticipated - the extent of the impacts of a plan or project, and whether those impacts can properly be considered temporary and reversible If the affected area is small, consider the risk to site integrity proportionally. For example, how important is the area in terms of rarity, location, distribution, vulnerability to change and ecological structure. If it is a supporting habitat, consider its importance to the designated species on the site. Consider any site survey information that may provide evidence of existing impacts.	The Applicant refers to its response to NE48 above.
NE59	Emissions from road transport (if applicable): Emissions from road transport may be an operational impact or be limited to the construction phase of proposals. Roads on the affected road network that lie within 200m of a designated site should be considered. If all affected roads are further than 200m from a protected site, then there is no likely significant effect (habitats sites) or no impact (SSSIs) on protected sites from air pollution Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and nitrogen oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a "restore" objective, this should be noted as a "retardation" of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.	The Applicant refers to its response to NE48 above.
NE60	Defra Emissions Factor Toolkit The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that NSIPs should be using (which we advise should also consider ammonia emissions as well as NOx – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are	The Applicant refers to its response to NE48 above.



Reference number	Representation	Applicant response
	to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment. We therefore advise that emission factors no later than 2030 are used for HRAs– which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NOx in exhaust gases.	
NE61	Motorways within the affected road network There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided. The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the proposals.	The Applicant refers to its response to NE48 above.



3.4 RR-003, Anglian Water Services Ltd

Reference number	Representation	Applicant response
AW1	ENGAGEMENT: Anglian Water has engaged with The Drovers Solar Farm Ltd (the Applicant) throughout the pre-application period including written comments to the Scoping Consultation, and the formal statutory consultation on the proposed Development Consent Order (DCO) application and the Preliminary Environmental Information Report (PEIR). In addition, Anglian Water has also met with the Applicant to discuss matters raised in the consultation including sending our template Protective Provisions for inclusion in the draft DCO.	The Applicant confirms the engagement referenced and thanks Anglian Water for its participation in the pre-application process.
AW2	PROTECTIVE PROVISIONS A copy of Anglian Water's template Protective Provisions was supplied to the Project Team and their legal representatives through the pre-application period to ensure that the necessary protections and measures are undertaken in discussion with Anglian Water when the Project moves forward to delivery. Whilst we welcome the inclusion of Protective Provisions for Anglian Water under 'Schedule 15 Part 8' of the Draft Development Consent Order (DCO) [APP-018], we have points of concern regarding additions made to these provisions that were not agreed with Anglian Water prior to their inclusion in the draft DCO.	The Applicant notes this comment and has responded to the specific points raised by Anglian Water below.
AW3	Anglian Water is obliged at this stage to object to the inclusion of specific wording added to paragraphs 95, and 98 (6) of Schedule 15, and would seek further discussion with the Applicant to resolve these outstanding matters.	The Applicant notes that Anglian Water has recently agreed to the form of wording found in these paragraphs in the protective provisions for its benefit found in Part 5 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant welcomes further engagement with Anglian Water on this wording, but hopes that the recently-agreed precedent can be applied here (as is currently drafted in Part 8 of Schedule 15 of the draft DCO [APP/3.1.1]).
AW4	There are various works identified in the Works Plan [APP-] and listed in Schedule 1 of the draft DCO that have the potential to interface with our underground assets within the order limits of the Project. Anglian Water would therefore seek to ensure the Protective Provisions do not in any way reduce the protection of our assets when the Project moves into delivery.	The Applicant considers that the protective provisions for the benefit of Anglian Water in Part 8 of Schedule 15 of the draft DCO [APP/3.1.1] sufficiently protect Anglian Water's assets, rather than reducing this protection, in relation to the Scheme, but welcomes further comments from Anglian Water on these protective provisions.
AW5	OTHER ENVIRONMENTAL MATTERS Anglian Water welcomes the 6.3 Environmental Statement (ES) Volume 3 Figure 16.1: Utilities Plan [APP-131] which indicates the foul rising main (pressurised sewer) that falls within the order limits of the Project. However this figure does not show the two Anglian Water water mains along the A1065 corridor which are within the proposed Order limits for the Off-Site Highway Works to A1065/A47 Fakenham Road interchange. The ES Chapter 16: Other Environmental Matters [APP-065] also fails to mention the two water mains in section 16.8 Telecommunications, Utilities and Television Receptors, even though this was brought to the attention to the Applicant through the statutory consultation. This would also need to be reflected in the Book of Reference [APP-023].	The Applicant notes this comment and has undertaken a digdat report on the Site which only highlighted one sewage main. The Applicant also conducted further utility searches throughout the pre-application stage to confirm the information provided in the digdat report and found no changes. The Applicant then issued a request for information (RFI) to Anglian Water to confirm their interests within the Site. A response was received from Anglian Water confirming the interest held identified in the RFI was correct (i.e. solely the sewage main) and this did not include the two water mains highlighted in Anglian Water's Relevant Representation. The Applicant remains engaged with Anglian Water regarding protective provisions and will engage with Anglian Water to clarify the extent of Anglian Water's interests in the Scheme.
AW6	As the mitigation measures identified for this section include protective provisions for the benefit of statutory undertakers within the draft DCO, this will address all our	The Applicant notes this comment and has responded to the specific points raised by Anglian Water above.



Reference number	Representation	Applicant response
	assets within the order limits regardless of whether these have been identified or not. Our comments in relation to these provisions are set out above.	
AW7	WATER RESOURCES It is noted that the Potential Main Issues for Examination [APP-061] include the availability of water resources, as a concern raised by the Environment Agency (ref EA1) regarding impacts on groundwater from abstraction. Anglian Water's response to the statutory consultation and Preliminary Environmental Impact Report raised the matter of water resources and the quantities of water that might be required through the construction and operation phases of the Project.	The Applicant notes this comment, and refers to paragraphs 12.8.95 to 12.8.100 of ES Chapter 12: Water Resources [APP-061] which state the potential water supplies for the Scheme.
AW8	Environmental Statement (ES) Chapter 12 Water Resources [APP-061], identifies Anglian Water water mains within the order limits of the Project [para 12.6.52]. Water demands during the construction phase are identified for different uses which include amenity use – this is a domestic water requirement and any temporary connection requests must be made to Anglian Water via our Inflow platform on our website.	The Applicant notes that any temporary connection requests must be made to Anglian Water via its Inflow platform and this will be undertaken following the granting of the DCO (if consented) and this is committed to through Requirement 11 of the draft DCO [APP/3.1.1].
AW10	The outline Battery Safety Management Plan (oBSMP) [APP-194] also provides detail regarding the emergency water supply required for fire containment and smoke suppression. As with water supply for amenity provision, the Applicant would need to request a connection for the emergency water tanks at the BESS compound if a potable water source is required. The water supply elements set out in ES Chapter 12 Water Resources do not appear to indicate the volume of the tanks and the refill rates required. There are no existing water mains within the main solar array area/BESS site.	The volume of the emergency water tanks will align with NFCC Planning Guidance, as detailed in the oBSMP [APP-194]. The tanks will be initially filled by tanker and monitored remotely, with periodic refilling conducted as required, as such access to a water main is negated.
AW11	For uses such as vehicle washing, equipment cleaning and horizontal directional drilling, the volumes required will exceed 20m ³ /day of non-domestic water. Whilst Anglian Water is currently in the position where we unfortunately have to decline requests for non-domestic water that exceed 20m ³ /day, the exception to this is for nationally significant infrastructure projects or special development orders that are in the national interest. Our statutory consultation response clearly stated that "if ... the Project calculates that it is likely to exceed 20m ³ /day for non-domestic water (does not include water for fire suppression or domestic uses such as sanitary uses), we would require the submission of a Water Resources Assessment for consideration by our internal Board to determine whether the water could be made available".	As outlined in paragraph 12.8.99 of ES Chapter 12: Water Resources [APP-061], the Scheme is likely to be supplied by a combination of Anglian Water Mains, the landowners' existing agricultural supply and a water tankered option. As such, the final required volume required to be supplied by Anglian Water will be determined and applied for following the grant of the DCO (if consented). The oCEMP [APP/7.6.1] has been updated at Deadline 1 to confirm that the Applicant is not expected to exceed 20m ³ per day from Anglian Water supply; however, this will be confirmed prior to the commencement of construction. As such, a Water Resources Assessment is not required at this stage.
AW12	Therefore, for Nationally Significant Infrastructure Projects that are requesting over 20m ³ /day of non-domestic water (e.g. for construction processes), Anglian Water would require a Water Resource Assessment (WRA) to be completed. This is so we can assess and better understand water demands, water efficiency measures and more effectively forecast water supply requirements so that they do not compromise our ability to supply domestic water to households and businesses. This will	Per the Applicant's response to AW11 above, the oCEMP [APP/7.6.1] has been updated at Deadline 1 to confirm that the Applicant is not expected to exceed 20m ³ per day from Anglian Water supply; however, this will be confirmed prior to the commencement of construction. As such, a Water Resources Assessment is not required at this stage.



Reference number	Representation	Applicant response
	help enable us to support nationally significant projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.	
AW13	If non-domestic water supply exceeding 20m3/day is required from Anglian Water, we would suggest that the Applicant engages with us to determine whether the non-domestic water supply requirements for the construction element of the Project could be met in principle; should this be an option the Applicant would wish to explore. Anglian Water would also encourage the use of SuDS and rainwater harvesting to assist with non-domestic supplies wherever possible e.g. for vehicle washing/dust suppression.	The Applicant refers to its response to AW11 above on this matter.
AW14	SOURCE PROTECTION ZONES Whilst the ES Chapter 12 Water Resources [APP-061] identifies the boreholes at Marham are 9m BGL (12.6.25), Anglian Water often sees groundwater levels much shallower than 9mBGL at our Marham boreholes - within 5m of surface and sometimes within 2m. The risks are admittedly lower than if the Project were much closer to our abstraction boreholes, however, we cannot categorically state that the solar PV is highly unlikely to influence sub-surface water. For example, the Project should ensure appropriately designed systems which avoid the use of PFAS coatings.	The Applicant notes that solar PV arrays typically do not use PFAS coatings on the tempered glass surface. As such, the systems are appropriately designed and the assessment in ES Chapter 12: Water Resources [APP-061] highlights that the PV mounting is unlikely to interact with subsurface water across the majority of the Order limits .
AW15	SURFACE WATER AND FOUL WATER DRAINAGE Anglian Water notes that there are supplemental powers for the discharge of water including to a public sewer [Part 4 Supplemental Powers, paragraph 17 of the draft DCO - APP-018]. However, we welcome the inclusion of Anglian Water as a consultee under Schedule 3 Requirements Surface and Foul Water Drainage paragraph 11 so we are consulted on details of the surface water drainage scheme and any foul water drainage system. This is particularly important as the Surface Water Drainage Strategy will include the BESS and run-off/containment measures.	The Applicant welcomes this comment.
AW16	Anglian Water would seek to be consulted on the Construction Environment Management Plan (Schedule 2 Requirements – paragraph 13 of the draft DCO) as there are a number of matters outlined in the Register of Commitments [APP-179], outline Construction Environment Management Plan [APP-186] that we would seek to be informed of at the detailed design stage.	The Applicant notes that Anglian Water has recently agreed to not be named as a consultee for the detailed Construction Environment Management Plan in the corresponding requirement found at Requirement 13 of Schedule 2 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant therefore hopes that the recently-agreed precedent can be applied here, and notes that Anglian Water is named as a consultee for approval of the surface water drainage scheme and (if any) foul water drainage system under Requirement 11 of Schedule 2 of the draft DCO [APP/3.1.1] .
AW17	Pollution Prevention Plan – we would want to ensure this includes the necessary water management measures to prevent impacts to groundwater receptors	As Anglian Water identifies, a Pollution Prevention Plan (PPP) is secured by the oCEMP [APP/7.6.1] . The oCEMP [APP/7.6.1] will be updated at Deadline 1 to ensure Anglian Water are provided with a copy of the PPP for sign off, prior to commencement of the construction phase.



3.5 RR-051, Safeguarding Department: Defence Infrastructure Organisation

Reference number	Representation	Applicant response
DIO1	The proposed development will be located south of South Acre, West Acre and Castle Acre, West Norfolk. The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. This objective is supported by the provisions of Paragraph 102 of the National Planning Policy Framework (December 2024) and the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002. The development area identified occupies statutory height, technical and birdstrike safeguarding zones that surround RAF Marham.	The Applicant notes this comment.
DIO2	Technical site safeguarding Technical site safeguarding serves to ensure that new development will not impact upon the effective operation of technical assets (which include communication and air navigation transmitter/receiver systems). The performance of these technical assets may be impacted by the physical attributes of a solar farm development such as their position, massing, and the materials they feature. In addition, electrical infrastructure featured in solar farms can also produce electro-magnetic fields or electrical noise emissions that may impact upon technical sites. The layout of the proposed development of the Solar PV site is identified within the drawing titled 'Figure 5.1: Concept Masterplan (Clean)/Document Reference APP/6.3.1 (Revision 1)'. This shows that the PV arrays will be installed in fields 1-34, predominantly in the southern, central and western areas of the application site.	The Applicant agrees with this comment.
DIO3	Areas of the PV arrays that may be deployed in fields 2,3,4,5, 10 and 11 will be in radar line of sight to the Precision Approach Radar (PAR) when it surveys the approach to runway 23. The MOD, has determined that due to the metallic content and highly reflective nature of the materials used in the construction of the arrays, those areas of PV arrays within these fields that will be in radar line of sight to the PAR will be a source of multi-path reflections of the radars transmissions. This would cause interference to the PAR impacting upon its ability to accurately detect and track aircraft during critical stages of their approach to runway 23. The MOD, therefore, objects to this application in its current form.	The Applicant is conducting further analysis of potential impacts upon the Precision Approach Radar (PAR) at RAF Marham. The results of this analysis will be used to engage further with the MOD in order to resolve this matter.
DIO4	Aerodrome height safeguarding The area surrounding the aerodrome is safeguarded to ensure that new development does not introduce any obstructions in the critical airspace encompassing the aerodrome in which aircraft undertake landing, take-off or circuiting manoeuvres. The proposed development area is located approximately 5.6km from the eastern threshold runway 05/23 and partially occupies an area where the MOD needs to	The Applicant notes this comment.



Reference number	Representation	Applicant response
	regulate the height of new developments with a height of, or exceeding, 15.2m above ground level.	
DIO5	Based upon the information submitted about the general layout and scale of the proposed development, it is not anticipated that it will cause any physical impacts upon aerodrome height safeguarding requirements. However, before any electrical work begins, up to 10 new pylons will be built along the proposed diversion route leading into the new National Grid Substation along with potentially temporary pylon structures. The applicant is currently engaging with National Grid over the reconfiguration of the overhead transmission line. Once the transmission line details are available, the MOD will need to be consulted to enable a detailed assessment of the temporary and new pylon structures to be undertaken, details of the locations and height of each electricity transmission tower and associated cable will be needed.	The Applicant notes this comment and confirms that it will consult with the MOD once the transmission line details are available.
DIO6	In addition, the possible use of cranes, high reaching plant equipment or temporal structures that may be used during the construction and decommissioning phases of the proposed development may introduce physical obstruction hazards to aerodrome operations or might impact upon the effective operation of the PAR. It will therefore be necessary for any DCO that may be granted to contain a requirement for a construction management plan to be submitted prior to construction and decommissioning works being undertaken. Suggested wording for such a Requirement is attached at Appendix A.	The Applicant has, at the MOD's request, updated the oCEMP [APP/7.6.1] at Deadline 1 to clarify that the Applicant will consult with the MOD regarding the design methodology for the possible use of cranes, high reaching plant equipment or temporal structure during the construction phase of the Scheme.
DIO7	Aerodrome Safeguarding- Potential Glint and Glare Effects The introduction of solar PV development, as proposed, close to RAF Marham has the potential to have an impact on aviation safety through glint and glare effects, which could be a hazard to aircraft engaged in landing or take-off procedures or circuiting at the aerodrome, by dazzling pilots at critical stages of flight. In addition, glare emissions from the proposed development may also have an adverse effect upon the air traffic control tower (ATCT) at the aerodrome. The applicant has undertaken a glint and glare study which has assessed possible impacts upon the relevant receptors at the aerodrome. In addition, the MOD has been provided with an additional modelling addendum (Pager Power 13248M) and further detail on predicted types, times and durations of glare geometrically possible into the air traffic control tower. (ForgeSolar (RAF11))	The Applicant notes this comment. The additional modelling addendum (13248M) identifies that short durations of 'yellow' glare are predicted towards sections of the visual circuits for both fixed and single axis tracking panel options. 'Yellow' glare is also possible towards vertical landing pads from fixed panels only. This glare is considered likely to be operationally accommodatable without the need for additional mitigation.
DIO8	The MOD understands the applicant may utilise east-west Single Axis Trackers PV panels or fixed PV panels. It is noted that there are no glint or glare impacts predicted on the ATCT from the assessed single-axis tracker PV panels. The glint and glare study also notes that cumulative impacts from the High Grove Solar areas are possible towards aviation receptors.	The Applicant agrees with this comment.
DIO9	The Solar photovoltaic glint and glare study identified for fixed south facing panels, that they could cause glint or glare with 'potential for temporary after-image' (yellow) towards the approach path for runway 05. For single axis tracking panels, glint or glare with 'potential for temporary after-image' (yellow) is predicted towards the approach paths for runways 01 and 05. Glint or glare with 'potential for temporary	The Applicant agrees with this comment.



Reference number	Representation	Applicant response
	after-image' (yellow) is also predicted to be geometrically possible towards the ATC tower for fixed panels.	
DIO10	The additional modelling addendum identified the potential for temporary after-image predicted towards sections of Rwys 23/05 and 01/19 visual circuits, for both fixed South facing panels and single axis tracking panels. For Vertical Landing Pad receptors, glint or glare with 'potential for temporary after-image' (yellow) is predicted for the fixed South facing panels. The ForgeSolar glare analysis of fixed (no rotation) panels identified glint or glare with 'potential for temporary after-image' (yellow) is predicted towards the ATCT.	The Applicant agrees with this comment.
DIO11	Glint and Glare Management Plan The MOD has concerns that its air traffic control staff in the ATCT could be subject to the effects of glare from this development and that glint or glare effects might impact on some aviation procedures. Therefore, it is considered necessary that a glint and glare management plan is secured via a Requirement which would provide means to address any such adverse effects that might arise. Suggested wording for such a Requirement is attached at Appendix B.: Birdstrike safeguarding The proposed development is within the area surrounding the aerodrome which is safeguarded to manage birdstrike hazard to air traffic using RAF Marham. Within this area the principal concern of the MOD relates to the creation of new habitats which may attract and support populations of large and/or flocking bird species hazardous to air traffic.	The Applicant notes this comment. Discussions are ongoing between the Applicant and the MOD to determine whether a glint and glare management plan is necessary. Mitigation measures are proposed which will ensure existing bird populations are fully safeguarded, whilst habitat enhancements will increase foraging opportunities for small songbirds, such as Corn Bunting, Yellowhammer and Linnet, which are not of concern in regard to bird strike. None of the measures would be anticipated to increase numbers of large and/ or flocking bird species, such as ducks, geese and corvids, which are potentially hazardous to air traffic.
DIO12	The development for which consent is sought includes provision to create field habitats for skylark and curlew to offset existing habitats that will be lost to the development. Proposed wetland features are shown in proximity to the mitigation areas for nesting birds which might consist of swales or potentially an open water body. As such these should be designed to limit the attractants, they may provide to hazardous birds to maintain air traffic safety. It is possible that other waterbodies or wetland features that may be created as part of the development scheme may also provide an attractant to large and or flocking birds. At this stage details of the water bodies or wetland features that will be created to manage drainage are not provided. Accordingly, the MOD considers it necessary that provision is made in any DCO that may be granted to ensure that the MOD is consulted upon the siting, design and management of any berms, swales, ponds, surface water drainage systems, storm water attenuation systems including storage basins and channels or other wetland features that may be included in the development, to ensure these will not introduce a birdstrike hazard to aircraft operating at RAF Marham. To implement this, the MOD considers it appropriate to include a requirement in any DCO that may be granted. Suggested wording for such a Requirement is attached at Appendix C.	The Applicant notes this comment and agrees to consult the MOD regarding birdstrike hazard. The oOEMP [APP/7.8.1] has been updated at Deadline 1 to specify this commitment. Mitigation measures are proposed which will ensure existing bird populations are fully safeguarded, whilst habitat enhancements will increase foraging opportunities for small songbirds, such as Corn Bunting, Yellowhammer and Linnet, which are not of concern in regard to bird strike. None of the measures would be anticipated to increase numbers of large and/ or flocking bird species, such as ducks, geese and corvids, which are potentially hazardous to air traffic.
DIO13	In summary, at this time, the MOD objects to this application in its current form due to the impact it will have upon the effective operation of the PAR and the need to maintain aviation safety. Should the applicant be able to overcome the MOD's technical objection to this scheme, the MOD will require any DCO to be amended as requested above, to include the additional requirements set out in this letter.	The Applicant notes this comment and will continue to engage with the MOD to seek to overcome the technical objection.



Reference number	Representation	Applicant response
DIO14	Appendix A Construction Management Plan Prior to commencing works to install or decommission the Drovers Solar Farm involving the deployment of any cranes or high reaching plant equipment or temporal tower type structures, the undertaker must submit a works management plan for the approval of the relevant planning authority in consultation with the Ministry of Defence. This should set out: a) Details of the locations and maximum dimensions of any cranes, high reaching plant equipment and temporal tower type structures that will be deployed within Ministry of Defence statutory aerodrome safeguarding zones surrounding RAF Marham, to erect and then take down the solar farm. b) Communication protocols to be established between the developer and the Ministry of Defence to ensure the undertaker provides notification of their programme of works to construct and decommission the Drovers Solar Farm. The undertaker must notify the Ministry of Defence in writing, at least 14 days prior to the commencing to deploy cranes, high reaching plant equipment or temporal tower type structures that will be located within Ministry of Defence statutory aerodrome safeguarding zones surrounding RAF Marham. The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements Reason In the interest of aviation safety. To ensure the development accords with the requirements of paragraph 102 of the National Planning Policy Framework.	The Applicant refers to its response to DIO6 above on this matter.
DIO15	Appendix B Glint and Glare Management Plan No development shall take place unless or until such time as a Glint & Glare Management Plan (GGMP) has been submitted to, and approved in writing by, the Local Planning Authority in consultation with the Ministry of Defence (MOD). The submitted GGMP shall contain, but not be limited to: i) detailed design, to include specifications of both solar panel (surface types, anti-reflective coating), mounting systems, illustrated with sectional plans as appropriate to show the angle of elevation and angle of azimuth of each solar panel in the development. ii) a schedule to regularly check and maintain the alignment of the solar panels; iii) a protocol through which glint and glare complaints can be submitted by the MOD, investigated, and any issues rectified/addressed/mitigated to include procedures to ensure that any mitigation needed is implemented following MOD consultation and agreement only; iv) procedures through which complaints, associated actions/outcomes will be recorded/communicated and made available to the MOD on request; v) provision to urgently address any incidents of a major impact that may occur that restricts aviation operations at RAF Marham to apply interim measures that will stop the source of glint or glare until measures to provide an enduring mitigation can be implemented; and vi) timescales for completing investigations, implementing remedial works and the provision of interim and, or, enduring mitigations to address any impact. The provisions set out in the GGMP and any modifications/mitigation, as agreed in writing with the local planning authority, shall be maintained for the life of the development. Reason In the interest of aviation safety. To ensure the development accords with the requirements of paragraph 102 of the National Planning Policy Framework.	The Applicant refers to its response to DIO11 above on this matter.
DIO16	Appendix C No part of the authorised development may commence until details of the siting, design, any associated planting and management of any ponds, swales, surface	The Applicant refers to its response to DIO12 above on this matter.



Reference number	Representation	Applicant response
	water drainage systems, storm water attenuation systems including storage basins and channels or other wetland features that are to be created for that part have been submitted to and approved by the relevant planning authority in consultation with the Ministry of Defence. The development shall be carried out and maintained strictly in accordance with those approved details and there shall be no variation or departure from those details without the expressed written consent of the relevant planning authority in consultation with the Ministry of Defence. Reason In the interest of aviation safety. To ensure the development accords with the requirements of paragraph 102 of the National Planning Policy Framework	



3.6 RR-044, Norfolk Local Access Forum

Reference number	Representation	Applicant response
NLAF1	The NLAF has reviewed the proposals submitted by The Drovers Solar Farm Limited and wishes to highlight the need for clarity on the recorded widths of access routes and whether a highways boundary survey has been undertaken.	The access route widths and parameters are detailed within Annex B of ES Appendix 9.2: Traffic Assessment [APP-163]. An updated highway boundary search is underway and the Applicant will provide the NLAF with the results of this once available.
NLAF2	The NLAF welcomes the applicant's indication that a wide corridor on either side of each PROW will be planted with sustainable, wildlife-friendly vegetation. Such corridors have the potential to deliver meaningful ecological benefits, enhance habitat connectivity, and improve the overall landscape experience for users. It is therefore essential that these commitments are secured within the final permission, with clear expectations for long-term management and maintenance. The Forum emphasises that PROWs should remain accessible, well-defined, and integrated within these ecological corridors to ensure that public enjoyment of the landscape is preserved and improved alongside biodiversity gains.	The oPRoWPPMP [APP-192] sets out the management strategy for PROWs, including details on how they will remain accessible and integrated into the existing ecological corridors. This document is secured by Requirement 16 of Schedule 2 of the draft DCO [APP/3.1.1] to ensure that these commitments are appropriately captured.



3.7 RR-037, National Highways

Reference number	Representation	Applicant response
NH1	1 Introduction 1.1 This relevant representation is National Highways' ("NH") formal written response to the application by The Drovers Solar Farm Limited ("Applicant") for an order granting development consent for The Drovers Solar Farm ("DCO"). The Applicant seeks development consent for proposed authorised development described in Schedule 1 of the draft DCO ("Authorised Development").	The Applicant notes this comment.
NH2	1.2 NH objects to the DCO and the Authorised Development for the following reasons: (a) The book of reference as submitted by the Applicant identifies 8 plots of land owned or occupied by NH for the purposes of its undertaking ("Plots") in respect of which compulsory powers are sought. The compulsory powers sought are described in the book of reference temporary possession ("Compulsory Powers"). To safeguard NH's interests and the safety and integrity of the Strategic Road Network ("SRN"), NH objects to the inclusion of the Plots in the DCO and to Compulsory Powers being granted in respect of them. The Plots constitute land acquired by NH for the purpose of maintaining its statutory undertaking and, accordingly, this representation is made under section 56 and sections 127 and 138 of the Planning Act 2008. NH considers that there is no compelling case in the public interest for the Compulsory Powers over the Plots without the inclusion of NH's protective provisions and that the grant of the DCO without such provisions would result in serious detriment to the SRN. (b) The DCO includes a number of provisions which authorise the interference with statutory powers belonging to NH and/or grant the Applicant powers over the SRN which would have significant safety implications if not properly and proportionately controlled through NH's protective provisions. These include 8, 10, 11, 12, 16, 17, 19, 20, 21, 24, 25, 27, 30, 31, 32, 33, 34, 40 and 47. (c) National Highways requires additional information regarding the proposed works no 1 and 11 outlined in Schedule 1 to the draft order in relation to their impact on the SRN. The nature and scope of the proposed works affecting the SRN is currently unclear. Without the appropriate level of information, it is not possible to effectively assess or manage the potential impact on the SRN. The inclusion of National Highways' protective provisions at Appendix 1 are required to ensure the necessary information is provided at the relevant stages. 1.3 NH is prepared to withdraw its objection subject to the Applicant agreeing to the inclusion of the NH protective provisions (in the form found at Appendix 1 of this document) on the DCO 1.4 NH reserves the right to produce additional grounds of objection to the Examining Authority as the DCO progresses should NH consider it necessary if any further information relating to the impact on the SRN comes to light.	The Applicant notes the grounds of objection from National Highways and has addressed the points made in the rows below. However, the Applicant notes that National Highways is prepared to withdraw its objection subject to the Applicant agreeing to the inclusion of the National Highways protective provisions (submitted at Appendix 1 of National Highways' Relevant Representation) in the draft DCO [APP/3.1.1]. The Applicant agrees that a form of protective provisions for the benefit of National Highways is required on the face of the draft DCO [APP/3.1.1] to protect National Highways' interests. The Applicant notes that it has included such a form of protective provisions for the benefit of National Highways in Part 4 of Schedule 15 of the draft DCO [APP/3.1.1]. However, the Applicant notes National Highways comments on these protective provisions later in National Highways' relevant representation, which includes (at Appendix 1) National Highways' preferred wording for these protective provisions. The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. On the matter of the compelling case in the public interest for the compulsory acquisition powers sought by the Applicant, the Applicant refers to section 6 of its Statement of Reasons [APP-021] for the justification of the inclusion of these powers in the draft DCO [APP/3.1.1]. In summary, this is due to meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life. Regarding the proposed works no 1 and 11 within Schedule 1, these works are temporary works at the A47/A1065 junction which may include verge reinforcement or temporary widening that may be required for the future abnormal indivisible loads (AIL) delivery at the junctions, as set out within the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163]. The works would be temporary in nature and only for the AIL delivery, being reinstated to the original condition post-delivery of the AIL. The works, including any technical approval protocols and Road Safety Audits, are secured through the oCTMP [APP/7.7.1] and will be confirmed to National Highways via the contractor as part of the AIL license protocol and via the detailed Construction Traffic Management Plan provided prior to commencement of construction.
NH3	3. Protecting the SRN 3.1 Unlike other statutory consultees involved in the consenting of nationally significant infrastructure projects, NH is a very active promoter of development consent orders and understands keenly the pressures and requirements placed on	The Applicant notes this comment and considers that the form of protective provisions for the benefit of National Highways in Part 4 of Schedule 15 of the draft DCO [APP/3.1.1] adequately protect the SRN, for the reasons set out in the corresponding rows below.



Reference number	Representation	Applicant response
	applicants to balance the delivery of the scheme with the protections afforded to statutory consultees. NH has been at the vanguard of DCO-consented development since the Planning Act 2008 was introduced and has offered many commitments for the protection of electricity and gas apparatus, water and drainage infrastructure, railway undertakings and other infrastructure owned by statutory consultees as a consequence of its own development consent orders. The SRN deserves the same measure of protection, proportionate to the extent of interference caused by the Authorised Development.	
NH4	3.2 NH understands the need for proportionality in the context of such protections and considers that a proportionate level of protection in all cases and as a minimum standard where there is the potential for impact to the SRN should be the following: (a) that NH be held harmless from the impact of third-party development; (b) that NH procedures put in place for the protection of property and persons are adhered to in accordance with NH's strict requirements on network occupancy; (c) that any works carried out to the highway, on NH land, underneath the highway, above the highway and to apparatus forming part of the highway estate should be certified by NH and approved by NH on completion of the works; (d) that financial provision should be put in place to ensure that in the event of the Applicant commencing works which may impact the SRN (including for example, underground works beneath the SRN or oversailing above it) and falling into financial difficulty or defaulting on completion of the works, NH has the resources needed to put the SRN and the highway estate into the position it was in before the Applicant commenced works; (e) that NH be indemnified for any loss or damage to the SRN or the highway estate as a result of the works; (f) that the Applicant requests approval from NH before exercising any powers under the DCO in relation to the SRN or the highway estate (such approval not to be unreasonably withheld) to enable proportionate rights and reservations to be secured for the protection of the SRN through private treaty; (g) that emergency procedures be agreed for NH to access the SRN to carry out works or remove dangerous obstacles resulting from the Authorised Development which pose a risk to life. 3.3 These provisions are included in the NH protective provisions.	The Applicant notes the minimum standards proposed by National Highways, but also notes that these standards are addressed in the National Highways protective provisions (submitted at Appendix 1 of National Highways' relevant representation) in the draft DCO [APP/3.1.1]. The Applicant agrees that a form of protective provisions for the benefit of NH is required on the face of the draft DCO [APP/3.1.1] to protect National Highways' interests. The Applicant notes that it has included such a form of protective provisions for the benefit of National Highways' in Part 4 of Schedule 15 of the draft DCO [APP/3.1.1]. However, the Applicant notes National Highways' comments on these protective provisions later in National Highways' relevant representation, which includes (at Appendix 1) National Highways' preferred wording for these protective provisions. The Applicant notes that National Highways' has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme.
NH5	3.4 NH considers that without the NH protective provisions, there is a considerable risk of serious detriment to the SRN, as any damage or injury to the SRN or wider highway estate would require funding to rectify that is not within NH's budget. There is no recourse to public funding for emergency works of this nature and a reserve of funding is not available. Without prejudice to whether the Authorised Development would cause a serious detriment to the SRN, it remains the case that the public purse should not be left to meet or subsidise costs of impacts caused by third party development to the SRN.	The Applicant agrees that a form of protective provisions for the benefit of National Highways is required on the face of the draft DCO [APP/3.1.1] to protect National Highways' interests and to allay National Highways' concerns regarding funding as set out here. The Applicant notes that it has included such a form of protective provisions for the benefit of National Highways in Part 4 of Schedule 15 of the draft DCO [APP/3.1.1]. However, the Applicant notes National Highways' comments on these protective provisions later in National Highways' relevant representation, which includes (as an appendix) National Highways' preferred wording for these protective provisions. The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1]



Reference number	Representation	Applicant response
		to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme.
NH6	3.5 Further, NH's estate comprises more than just the corpus of the highway (the 'top two spits'). Unlike local roads, where the local highway authority typically controls only the highway strata and sufficient vertical limits above and beneath the highway to maintain necessary apparatus and street furniture, in most cases NH controls the freehold of the land beneath the highway to the centre of the earth and to the heavens above. This estate is held for the benefit of the statutory undertaking, to ensure that the SRN is not compromised and that maintenance or improvement works at any required depth can take place free from risk of trespass or ransom. Where apparatus is co-located in the highway (which is commonplace), that apparatus has been authorised by NH or has been installed through industry standard processes (such as under the New Roads and Street Works Act 1991), where statutory protection is afforded to NH as the highway or street authority. Whilst NH is prepared to grant a sub-surface interest or right to co-locate apparatus in the highway, where it is geotechnically possible and respecting other apparatus that is in, on, under or over the highway – the interest must be proportionate and necessary and cannot be to the detriment of NH, the SRN or other undertakers. It cannot be acceptable that apparatus is placed in, on, under or over the SRN through a DCO by disapplying statutory protections that NH has and not accepting to acquiesce to the terms which are required by NH to manage its network in accordance with regulatory requirements.	The Applicant notes this comment and has addressed National Highways' concerns in the corresponding rows above and below.
NH7	3.6 For the sake of clarity and transparency, NH has no desire to stymy development or to impose requirements on the Applicant which are disproportionate to the potential harm that could be caused to the SRN. NH is legally obliged to co-operate with third parties exercising planning or highway functions, which includes the Applicant in this statutory process⁴. NH is prepared to engage fully and assist in whatever way is reasonable to ensure that the Authorised Development proceeds as quickly and efficiently as possible. ⁴ Section 5(1) Infrastructure Act 2015	The Applicant welcomes this comment and looks forward to continued engagement with National Highways.
NH8	4. The Proposed Works 4.1 The Applicant's draft DCO includes powers of temporary possession in respect of the land interests owned by NH as set out in the table below referred to in the Book of Reference. National Highway's comments on the proposed powers in respect of its interests are set out in the table. 4.2 For the purpose of the table below, the following, taken from the tables in the Book of Reference at Paragraph 5 applies: - Purpose One: Temporary use (including access and compounds) to facilitate the construction of Work Nos. 1 to 11. 4.3 It is noted that the purpose set out above is very wide and vague. Further clarity is sought in relation to the purpose and reasons for which temporary possession is sought in relation to each plot so NH can fully assess the impact of the proposals on the SRN.	National Highways has been identified within the following plots 5-47, 5-49, 5-50, 5-51, 5-53, 5-54, 5-55 and 5-56 for which temporary possession is sought, and the purpose and reason is for work 8a. Work 8a is defined as: Work No. 8— works to facilitate access to Work Nos. 1, 2, 3, 6, 7, 9, 10 and 11 including (a) Work No. 8A— works to facilitate temporary construction, maintenance and decommissioning access to Work Nos. 1, 2, 3, 6, 7, 9, 10 and 11 including— (i) creation of accesses from the public highway; (ii) creation of visibility splays; (iii) works to alter the layout of any street or highway temporarily; and (iv) offsite works adjacent to highways land including those to structures, boundary features, drainage features on private land, in connection with the movement of abnormal indivisible loads.



Reference number	Representation	Applicant response
		The works are temporary highway works at the A47 / A1065 junction which may include verge reinforcement, temporary street furniture removal, vegetation removal or temporary widening that may be required for the future AIL delivery at the junctions, as set out within the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163] . The works would be temporary in nature and only for the AIL delivery, being reinstated to the original condition post delivery of the AIL. The works, including any technical approval protocols, Road Safety Audits and traffic management, are secured through the oCTMP [APP/7.7.1] and will be confirmed to National Highways via the contractor as part of the AIL license protocol and via the detailed Construction Traffic Management Plan provided prior to commencement of construction.
NH9	Plot: 5-47 Owner: NH Acquisition Category: Temporary Possession Works Proposed (Taken from the Applicant's statement of reasons): Purpose One NH Comments: The Book of Reference notes that NH are a Category 2 person in respect of rights granted by a Deed of Exchange dated 17 December 1984. NH require further details of the works proposed on this parcel. If there are any potential traffic management implications, then NH require to be consulted before works take place. The Applicant should be required to obtain NH's consent in the event the activities affect the SRN or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.	In respect of the request for the Applicant to seek National Highways' consent, the Applicant notes that this is included in the form of protective provisions for the benefit of National Highways referred to in other rows of this response, including above in relation to NH2. The works are temporary highway works at the A47/A1065 junction which may include verge reinforcement, temporary street furniture removal or temporary widening that may be required for the future AIL delivery at the junctions, as set out within the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163]. The works would be temporary in nature and only for the AIL delivery, being reinstated to the original condition post-delivery of the AIL. The works, including any technical approval protocols, Road Safety Audits and traffic management, are secured through the oCTMP [APP/7.7.1] and will be confirmed to National Highways via the contractor as part of the AIL license protocol and via the detailed Construction Traffic Management Plan provided prior to commencement of construction.
NH10	Plot: 5-49 Owner: NH Acquisition Category: Temporary Possession Works Proposed (Taken from the Applicant's statement of reasons): Purpose One NH Comments: The Book of Reference notes that NH are a Category 1 person as an Owner/Occupier. NH require further details of the works proposed on this parcel. If there are any potential traffic management implications, then NH require to be consulted before works take place. The Applicant should be required to obtain NH's consent in the event the activities affect the SRN or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.	In respect of the request for the Applicant to seek National Highways' consent, the Applicant notes that this is included in the form of protective provisions for the benefit of National Highways referred to in other rows of this response, including above in relation to NH2. The works are temporary highway works at the A47/A1065 junction which may include verge reinforcement or temporary widening that may be required for the future AIL delivery at the junctions, as set out within the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163]. The works would be temporary in nature and only for the AIL delivery, being reinstated to the original condition post-delivery of the AIL. The works, including any technical approval protocols, Road Safety Audits and traffic management, are secured through the oCTMP [APP/7.7.1] and will be confirmed to National Highways via the contractor as part of the AIL license protocol and via the detailed Construction Traffic Management Plan provided prior to commencement of construction.
NH11	Plot: 5-50 Owner: NH Acquisition Category: Temporary Possession	In respect of the request for the Applicant to seek National Highways' consent, the Applicant notes that this is included in the form of protective provisions for the benefit of National Highways referred to in other rows of this response, including above in relation to NH2.



Reference number	Representation	Applicant response
	Works Proposed (Taken from the Applicant's statement of reasons): Purpose One NH Comments: The Book of Reference notes that NH are a Category 1 person as an Owner/Occupier. NH require further details of the works proposed on this parcel. If there are any potential traffic management implications, then NH require to be consulted before works take place. The Applicant should be required to obtain NH 's consent in the event the activities affect the SRN or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH 's proposed protective provisions at Appendix 1.	The works are temporary highway works at the A47/A1065 junction which may include verge reinforcement or temporary widening that may be required for the future AIL delivery at the junctions, as set out within the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163]. The works would be temporary in nature and only for the AIL delivery, being reinstated to the original condition post-delivery of the AIL. The works, including any technical approval protocols, Road Safety Audits and traffic management, are secured through the oCTMP [APP/7.7.1] and will be confirmed to National Highways via the contractor as part of the AIL license protocol and via the detailed Construction Traffic Management Plan provided prior to commencement of construction.
NH12	Plot: 5-51 Owner: NH Acquisition Category: Temporary Possession Works Proposed (Taken from the Applicant's statement of reasons): Purpose One NH Comments: The Book of Reference notes that NH are a Category 1 person as an Owner/Occupier. NH require further details of the works proposed on this parcel. If there are any potential traffic management implications, then NH require to be consulted before works take place. The Applicant should be required to obtain NH 's consent in the event the activities affect the SRN or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH 's proposed protective provisions at Appendix 1.	In respect of the request for the Applicant to seek National Highways' consent, the Applicant notes that this is included in the form of protective provisions for the benefit of National Highways referred to in other rows of this response, including above in relation to NH2. The works are temporary highway works at the A47/A1065 junction which may include verge reinforcement or temporary widening that may be required for the future AIL delivery at the junctions, as set out within the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163]. The works would be temporary in nature and only for the AIL delivery, being reinstated to the original condition post-delivery of the AIL. The works, including any technical approval protocols, Road Safety Audits and traffic management, are secured through the oCTMP [APP/7.7.1] and will be confirmed to National Highways via the contractor as part of the AIL license protocol and via the detailed Construction Traffic Management Plan provided prior to commencement of construction.
NH13	Plot: 5-53 Owner: NH Acquisition Category: Temporary Possession Works Proposed (Taken from the Applicant's statement of reasons): Purpose One NH Comments: The Book of Reference notes that NH are a Category 1 person as an Owner/Occupier. NH require further details of the works proposed on this parcel. If there are any potential traffic management implications, then NH require to be consulted before works take place. The Applicant should be required to obtain NH 's consent in the event the activities affect the SRN or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH 's proposed protective provisions at Appendix 1.	In respect of the request for the Applicant to seek National Highways' consent, the Applicant notes that this is included in the form of protective provisions for the benefit of National Highways referred to in other rows of this response, including above in relation to NH2. The works are temporary highway works at the A47/A1065 junction which may include verge reinforcement or temporary widening that may be required for the future AIL delivery at the junctions, as set out within the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163]. The works would be temporary in nature and only for the AIL delivery, being reinstated to the original condition post-delivery of the AIL. The works, including any technical approval protocols, Road Safety Audits and traffic management, are secured through the oCTMP [APP/7.7.1] and will be confirmed to National Highways via the contractor as part of the AIL license protocol and via the detailed Construction Traffic Management Plan provided prior to commencement of construction.



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NH14	Plot: 5-54 Owner: NH Acquisition Category: Temporary Possession Works Proposed (Taken from the Applicant's statement of reasons): Purpose One NH Comments: The Book of Reference notes that NH are a Category 2 person in respect of rights granted by a Deed of Exchange dated 17 December 1984. NH require further details of the works proposed on this parcel. If there are any potential traffic management implications, then NH require to be consulted before works take place. The Applicant should be required to obtain NH 's consent in the event the activities affect the SRN or any land NH has an interest in. As a public body, N H is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH 's proposed protective provisions at Appendix 1.	In respect of the request for the Applicant to seek National Highways' consent, the Applicant notes that this is included in the form of protective provisions for the benefit of National Highways referred to in other rows of this response, including above in relation to NH2. The works are temporary highway works at the A47/A1065 junction which may include verge reinforcement or temporary widening that may be required for the future AIL delivery at the junctions, as set out within the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163]. The works would be temporary in nature and only for the AIL delivery, being reinstated to the original condition post-delivery of the AIL. The works, including any technical approval protocols, Road Safety Audits and traffic management, are secured through the oCTMP [APP/7.7.1] and will be confirmed to National Highways via the contractor as part of the AIL license protocol and via the detailed Construction Traffic Management Plan provided prior to commencement of construction.
NH15	Plot: 5-55 Owner: NH Acquisition Category: Temporary Possession Works Proposed (Taken from the Applicant's statement of reasons): Purpose One NH Comments: The Book of Reference notes that NH are a Category 1 person as an Owner. NH require further details of the works proposed on this parcel. If there are any potential traffic management implications, then NH require to be consulted before works take place. The Applicant should be required to obtain NH 's consent in the event the activities affect the SRN or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.	In respect of the request for the Applicant to seek National Highways' consent, the Applicant notes that this is included in the form of protective provisions for the benefit of National Highways referred to in other rows of this response, including above in relation to NH2. The works are temporary highway works at the A47/A1065 junction which may include verge reinforcement or temporary widening that may be required for the future AIL delivery at the junctions, as set out within the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163]. The works would be temporary in nature and only for the AIL delivery, being reinstated to the original condition post-delivery of the AIL. The works, including any technical approval protocols, Road Safety Audits and traffic management, are secured through the oCTMP [APP/7.7.1] and will be confirmed to National Highways via the contractor as part of the AIL license protocol and via the detailed Construction Traffic Management Plan provided prior to commencement of construction.
NH16	Plot: 5-56 Owner: NH Acquisition Category: Temporary Possession Works Proposed (Taken from the Applicant's statement of reasons): Purpose One NH Comments: The Book of Reference notes that NH are a Category 1 person as an Owner. NH require further details of the works proposed on this parcel. If there are any potential traffic management implications, then NH require to be consulted before works take place. The Applicant should be required to obtain NH's consent in the event the activities affect the SRN or any land NH has an interest in. As a public	In respect of the request for the Applicant to seek National Highways' consent, the Applicant notes that this is included in the form of protective provisions for the benefit of National Highways referred to in other rows of this response, including above in relation to NH2. The works are temporary highway works at the A47/A1065 junction which may include verge reinforcement or temporary widening that may be required for the future AIL delivery at the junctions, as set out within the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163]. The works would be temporary in nature and only for the AIL delivery, being reinstated to the original condition post-delivery of the AIL. The works, including any technical approval protocols, Road Safety Audits and traffic management, are secured through the oCTMP [APP/7.7.1] and will be confirmed to National Highways via the contractor as part of the AIL license protocol and via the detailed Construction Traffic Management Plan provided prior to commencement of construction.



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	body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.	
NH17	Please can the Applicant also confirm whether NH have any interest in any other plots.	The Applicant has identified all National Highways interests as set out in the Book of Reference [APP/4.3.2] and the Land Plan [APP-008] .
NH18	5. Draft DCO 5.1 Whilst the protective provisions included in the Applicant's draft DCO for NH's benefit, include some protections for NH, concerns remain in relation to some of the articles. The form of protective provisions at Appendix 1 addresses those concerns. The Applicant's draft DCO includes the following provisions which are of specific concern to NH:	The Applicant notes this comment and has responded to the specific points raised by National Highways below.
NH19	Article/Schedule: Article 8 Summary of the Applicant's Drafting: (1) The undertaker may, for the purposes of the authorised development, enter on so much of any of the streets specified in Schedule 4 (streets subject to street works) and may— (a) break up or open the street, or any sewer, drain or tunnel under it; (b) drill, tunnel or bore under the street; (c) place and keep apparatus in or under the street; (d) maintain apparatus in or under the street, change its position or remove it; (e) repair, replace or otherwise alter the surface or structure of the street or any culvert under the street; and (f) execute any works required for or incidental to any works referred to in sub-paragraphs (a) to (e). NH Comments: This article will give the Applicant the power to break open the streets, place and keep apparatus etc. beneath the NH network, in particular the A47 Slip Road. To date, no information has been received by NH as to works to be conducted on the SRN, so the nature and scope of the proposed works remains unclear. Please refer to paragraph 4.2 – 4.4 for the information NH require in order to address NH' concern relating to this article. Additionally, please note it is NH's preference that any apparatus installed under the strategic road network is carried out by Horizontal Directional Drilling (HDD) rather than an open cut method. It is noted that the Applicant's protective provisions for the benefit of NH to the draft order requires NH's approval to the design before works under this article commence at paragraph 53(2) however this does not extend to approval of the programme for the cable works. The protective provisions contained in the draft DCO are not agreed by NH. A copy of NH' proposed protective provision are attached to this representation at Appendix 1.	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 8 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 8 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.



Reference number	Representation	Applicant response
	As the highway authority for the A47, NH must have control over the operations being carried out on and under its network in order to comply with its duty to co-ordinate the execution of works of all kinds (including works for road purposes) under section 59 of the New Roads and Street Act 1991. Road space booking will be required in connection with these works so NH can comply with this duty. This is critical from a safety perspective and to protect the structure of the street and the integrity of apparatus in it. Therefore, the Applicant should be required to obtain NH's consent in the event the activities effect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH' objection to this article, which requires the Applicant to obtain NH consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	
NH20	Article/Schedule: Article 10 Summary of the Applicant's Drafting: (1) The undertaker may for the purposes of the authorised development alter the layout of, and carry out the works to, the streets— (a) specified in column 2 of the table in Part 1 (permanent alteration of layout) of Schedule 5 (alteration of streets) permanently in the manner specified in relation to that street in column 3; and 12 (b) specified in column 2 of the table in Part 2 (temporary alteration of layout) of Schedule 5 temporarily in the manner specified in relation to that street in column 3. (2) Without prejudice to the specific powers conferred by paragraph (1), but subject to paragraphs (3) and (4), the undertaker may, for the purposes of constructing, operating or maintaining the authorised development, alter the layout of any street and, without limitation on the scope of this paragraph, the undertaker may— (a) alter the level or increase the width of any kerb, footway, cycle track or verge; (b) make and maintain passing places; and (c) alter, remove, replace or relocate any street furniture, including but without limitation any bollards, lighting columns or street signs. (3) The undertaker must restore any street that has been temporarily altered under this Order to the reasonable satisfaction of the street authority. (4) The powers conferred by paragraph (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority. NH Comments: This Article will give the Applicant power to temporarily alter the layout and carry out works to the streets specified in column 2 of the table in Part 2 of Schedule 5 which	The Applicant considers the reference from National Highways to paragraph 53(2) of the protective provisions for the benefit of National Highways found in Part 4 of Schedule 15 of the draft DCO [APP/3.1.1] to be erroneous and should instead refer to paragraph 35(2). Nonetheless, the Applicant agrees that it must obtain National Highways' prior approval for works undertaken under article 10 in connection with the SRN. The Applicant responds to National Highways' concern regarding article 47 below. The Applicant also notes that the relevant wording in article 10 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 10 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.



Reference number	Representation	Applicant response
	includes the A47 Slip Road. It is also noted that there are non street specific powers in subsection (2). The Applicant must obtain NH's prior approval for works undertaken under this article in connection with the SRN at paragraph 53(2) of NH's protective provisions of the applicant's draft DCO. However, such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	
NH21	Article/Schedule: Article 12 Summary of the Applicant's Drafting: (1) The undertaker, during and for the purposes of constructing, maintaining or decommissioning the authorised development, may temporarily close, prohibit the use of, restrict the use of, alter or divert any street or public right of way and may for any reasonable time— (a) divert the traffic or a class of traffic from the street or public right of way; (b) authorise the use of motor vehicles on classes of public rights of way where, notwithstanding the provisions of this article, there is otherwise no public right to use motor vehicles; and (c) subject to paragraph (2), prevent all persons from passing along the street or public right of way. (2) The undertaker must provide reasonable access for pedestrians going to or from premises abutting a street or public right of way affected by the temporary closure, prohibition, restriction, alteration or diversion of a street or public right of way under this article if there would otherwise be no such access. (3) Without prejudice to the generality of paragraph (1), the undertaker may temporarily close, prohibit the use of, restrict the use of, authorise the use of, alter or divert— (a) the streets specified in column 2 of the table in Part 1 (streets to be temporarily closed) of Schedule 6 (streets and public rights of way) to the extent specified in column 3 of that table; (b) the public rights of way specified in column 2 of the table in Part 2 (public rights of way to be temporarily closed) of Schedule 6 to the extent specified in column 3 of that table; and (c) the public rights of way specified in column 2 of the table in Part 3 (temporary use of motor vehicles on public rights of way) of Schedule 6 to the extent specified in column 3 of that table. (4) The undertaker must not temporarily close, prohibit the use of, restrict the use of, authorise the use of, alter or divert— (a) any street or public right of way specified in paragraph (3) without first consulting the street authority; and (b) any other street or public right of way without the consent of the street authority, and the street authority may attach reasonable conditions to any such consent	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 12 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 12 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.



Reference number	Representation	Applicant response
	NH Comments: This article provides the Applicant with powers equivalent to a temporary traffic regulation order in connection with any road. NH has no interest in the streets or public rights of way listed in Schedule 6 however it is noted that subsection 1 contains a general power that may affect NH's interests. The Applicant is required to consult with NH in this regard but they do not require our consent. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH' consent in the event the activities effect the SRN or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH objection to this article, which requires the Applicant to obtain NH consent before exercising their right under this article.	
NH22	Article/Schedule: Article 14 Summary of the Applicant's Drafting: (1) The undertaker may, for the purposes of the authorised development — (a) form and lay out the permanent means of access, or improve existing means of access, in the locations specified in Part 1 (permanent means of access) of Schedule 7 (access to works); (b) form and lay out the temporary means of access, or improve existing means of access, in the locations specified in Part 2 (temporary means of access) of Schedule 7 (access to works); and (c) with the approval of the relevant planning authority after consultation with the highway authority in such a form as reasonably required by the highway authority, form and lay out such other means of access or improve existing means of access, at such locations within the Order limits as the undertaker reasonably requires for the purposes of the authorised development NH Comments: This article provides the Applicant with powers to carry out works to form and lay out such means of access or to improve existing means of access at any location within the order limits. NH network, forms part of that order limit. Whilst approval is required from the relevant planning authority with consultation of the highway authority for such an access, approval of the highway authority is not required. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH's consent in the event the activities effect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent.	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which the Applicant considers would address National Highways' concern in relation to this article as that paragraph addresses the Applicant being required to seek National Highways' consent in the event the activities affect the strategic road network or any land National Highways has an interest in. The Applicant also notes that the relevant wording in article 14 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 14 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.



Reference number	Representation	Applicant response
NH23	Article/Schedule: Article 16 Summary of the Applicant's Drafting: (1) Subject to the provisions of this article, the undertaker may make temporary provision for the purposes of the construction, maintenance and decommissioning of the authorised development— (a) as to the speed at which vehicles may proceed along any road; (b) permitting, prohibiting or restricting the stopping, waiting, loading or unloading of vehicles on any road; (c) as to the prescribed routes for vehicular traffic or the direction or priority of vehicular traffic on any road; (d) permitting, prohibiting or restricting the use by vehicular traffic or nonvehicular traffic of any road; and (e) suspending or amending in whole or in part any order made, or having effect as if made, under the 1984 Act. (2) Subject to the provisions of this article the undertaker may at any time, in the interests of safety and for the purposes of, or in connection with, the construction of the authorised development, temporarily place traffic signs and signals in the extents specified in column 3 of road specified in column 2 of the table in Schedule 8 (traffic regulation measures) and over which temporary provision has been made under paragraph (1) and the placing of those traffic signs and signals is deemed to have been permitted by the traffic authority for the purposes of section 65 of the 1984 Act and the Traffic Signs Regulations and General Directions 2016(a). (3) No speed limit imposed by or under this Order applies to vehicles falling within regulation 3(4) of the Road Traffic Exemptions (Special Forces) (Variation and Amendment) Regulations 2011(b) when in accordance with regulation 3(5) of those regulations. (4) Before exercising the power conferred by paragraph (1) the undertaker must— (a) consult with the chief officer of police in whose area the road is situated; and (b) obtain the written consent of the traffic authority. (5) The undertaker must not exercise the powers in paragraphs (1) or (2) unless it has— (a) given not less than 4 weeks' notice in writing of its intention so to do to the chief officer of police and to the traffic authority in whose area the road is situated; and (b) not less than 7 days before the provision is to take effect published the undertaker's intention to make the provision in one or more newspaper circulating in the area in which any road to which the provision relates is situated. (6) Any provision made under the powers conferred by paragraph (1) of this article may be suspended, varied or revoked by the undertaker from time to time by subsequent exercise of the powers conferred by paragraph (1).	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of NH's proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 16 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 16 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO. In relation to National Highways' query regarding the Traffic Signs Regulations and General Directions 2016, the Applicant notes that the drafting in article 16(2) to which this query relates is well-precedented across made solar DCOs, including the recent East Yorkshire Solar Farm Order 2025, the Tillbridge Solar Order 2025 and the Fenwick Solar Farm Order 2026. This sub-paragraph provides the Applicant with powers to place temporarily traffic signs and signals in the extents of the roads specified in Schedule 8 of the draft DCO [APP/3.1.1]. This Schedule identifies the relevant roads and specifies the extents of the roads that will be subject to temporary traffic signal and banksman control areas. The inclusion of this power is justified as it allows a degree of flexibility to respond to changing conditions on the road network over the lifetime of the Scheme.



Reference number	Representation	Applicant response
	(7) Any provision made by the undertaker under article 12 (temporary closure, restriction or prohibition of use of streets and public rights of way) or paragraph (1) or (2) of this article— (a) must be made by written instrument in such form as the undertaker considers appropriate; (b) has effect as if duly made by the traffic authority in whose area the road is situated as a traffic regulation order under the 1984 Act and the instrument by which it is effected may specify specific savings and exemptions to which the provision is subject; and (c) is deemed to be a traffic order for the purposes of Schedule 7 (road traffic contraventions subject to civil enforcement) to the Traffic Management Act 2004(c). NH Comments: This article provides the Applicant with powers equivalent to a temporary traffic regulation order in connection with any road. It is noted that NH do not have an interest in the roads specified in Schedule 8 but subsection 1 contains a wider power which may effect NH' interests. It is noted consent is required from the traffic authority before exercising those powers however such consent should not be subject to deemed consent under article 47. Please see comments in this regard below. The draft order allows the Applicant to exercise their powers at article 16(1) without the consent of NH and provides the Applicant with deemed approval under section 65 1984 Act. NH must have control over the placing of signage on its network. This is critical from a safety perspective and to maintain the integrity of the asset. NH will require details of any proposed signage and must review and approve the proposed signage. Full details, including the dimensions of the signs, must be submitted for approval. All signage must be designed in accordance with the Department for Transport's requirements, as outlined in the Traffic Signs Manual Chapter 8, and must also comply with the Design Manual for Roads and Bridges (DMRB). The Applicant should be required to obtain NH' consent for any signage on the SRN to ensure these standards are met and to protect the safety of the road users. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH' proposed protective provisions would address NH objection to this article in relation to signage being permitted under section 65 of the 1984. This requires the Applicant to obtain NH' consent before exercising their right under this article. In addition, NH seek clarity from the application on the reasons wording is sought that any signage would be deemed to comply with the Traffic Signs Regulations and General Directions 2016. This is a set of directions that governs the design of signage which all signage on the SRN should comply with.	
NH24	Article/Schedule: Article 17 Summary of the Applicant's Drafting:	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed



Reference number	Representation	Applicant response
	(1) Subject to paragraphs (3), (4) and (7) the undertaker may use any watercourse or any public sewer or drain for the drainage of water in connection with the construction or maintenance or decommissioning of the authorised development and for that purpose may lay down, take up and alter pipes and may, on any land within the Order limits, make openings into, and connections with, the watercourse, public sewer or drain. 3) The undertaker must not discharge any water into any watercourse, public sewer or drain except with the consent of the person to whom it belongs whose consent may be given subject to terms and conditions as that person may reasonably impose. NH Comments: This article allows the Applicant to use any watercourse, public sewer or drain for the drainage of water in connection with the authorised development. It is unclear whether or not this article applies to NH' drainage system as drafted or whether this applies to public drains only. NH' drainage system is not a public drain. Please can the Applicant confirm if the intention is for this article to apply to NH' drains. If it is the intention for this article to apply to NH drains, NH do have concerns in this regard. It is noted consent is required from the person to whom the watercourse, drain or sewer belongs however such consent is subject to deemed consent under article 47. Please see comments in this regard below. NH is concerned this provision potentially allows the Applicant to make use of highway drainage infrastructure for the benefit of their authorised development. Paragraph 59 of the Dft Circular 01/2022 which contacts government guidelines NH are required to comply with, sets out the following: <i>59. To ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment. The company may require a drainage management and maintenance agreement to be entered into to secure this requirement in perpetuity.</i> These provisions require consent to be obtained from the relevant highway authority before water can be discharged into the highway drainage system. As such, measures should be put in place so that such consent or refusal can be provided. Inclusion of paragraph 7(2) of NH' proposed protective provisions at Appendix 1 would address NH objection to this article, which requires the Applicant to obtain NH consent before exercising their right under this article. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH' proposed protective provisions.	for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 17 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 17 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO. In relation to National Highways' query as to whether this article can apply to National Highways' drainage system, the Applicant confirms that this is indeed the case, but the Applicant is not currently expecting to impact National Highways' drainage system as the works to which this would apply (i.e. widening works on the A47 / 1056 junction) as these works, if required, are expected to be temporary in nature. The Applicant also notes that article 17(3) requires National Highways' consent for such discharge of water.
NH25	Article/Schedule: Article 19 Summary of the Applicant's Drafting: (4) For the purpose of carrying out protective works under this article to a building, the undertaker may (subject to paragraphs (5) and (6))—	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those



Reference number	Representation	Applicant response
	(a) enter the building and any land within its curtilage; and (b) where the works cannot be carried out reasonably conveniently without entering land which is adjacent to the building but outside its curtilage, enter the adjacent land (whether or not such adjacent land is inside or outside the Order limits) but not any building erected on it NH Comments: This article provides the Applicant with the power to carry out protective works to any building within the order limits. Whilst NH does not have any buildings within the order limits, it does have concern in relation to sub-paragraph 4 of this article, which provides the Applicant with the power to enter land which is adjacent to the building to carry out the protective works. The said land may form part of the SRN or land NH has an interest in. The article does not require the Applicant to obtain consent from the landowner but merely obtain their consent. NH must have control over the operations being carried out on its network and land it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH' consent in the event any access or works under this article effect the SRN or any land NH has an interest in. NH must ensure the safety of its road users and provide prior to approval to those accessing its network. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.	protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which the Applicant considers would address National Highways' concern in relation to this article as that paragraph addresses the Applicant being required to seek National Highways' consent in the event access or works under this article effect the SRN or any land National Highways has an interest in. The Applicant also notes that the relevant wording in article 19(4) of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 19(4) of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.
NH26	Article/Schedule: Article 20 Summary of the Applicant's Drafting: (1) The undertaker may for the purposes of this Order enter on any land shown within the Order limits or enter on any land which may be affected by the authorised development or enter on any land upon which entry is required in order to carry out monitoring or surveys in respect of the authorised development and— (a) survey or investigate the land; (b) without prejudice to the generality of sub-paragraph (a), make trial holes or boreholes in such positions on the land as the undertaker thinks fit to investigate the nature of the surface layer and subsoil and groundwater and remove soil and groundwater samples; (c) without prejudice to the generality of sub-paragraph (a), carry out ecological or archaeological investigations on such land, including the digging of trenches; and (d) place on, leave on and remove from the land apparatus for use in connection with the survey and investigation of land and making of trial holes, boreholes or trenches. (2) No land may be entered or equipment placed or left on or removed from the land under paragraph (1) unless at least 14 days' notice has been served on every owner and occupier of the land.	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 20 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 20 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.



Reference number	Representation	Applicant response
	(3) Any person entering land under this article on behalf of the undertaker— (a) must, if so required before entering the land, produce written evidence of their authority to do so; and (b) may take with them such vehicles and equipment as are necessary to carry out the survey or investigation or to make the trial holes, boreholes or trenches. (4) No trial holes, boreholes or trenches are to be made under this article— (a) in land located within the highway boundary without the consent of the highway authority; or (b) in a private street without the consent of the street authority. NH Comments: This article allows the Applicant to enter any land within the order limits effected by the authorised development or enter on any land upon which entry is required in order to carry out monitor or survey in respect of the authorised development and carry out surveys or investigations, trial holes, bore holes, ecological or archaeological investigations and place leave or remove apparatus on land in this regard. Whilst it is noted consent is required from the highway authority at sub paragraph 4 for any trial holes, bore holes and trenches for land located within the highway boundary, consent is not required for the wider use of the powers granted within this article such as access to land for surveys etc. Consent is also not required for any land NH own that is outside of the highway boundary and the Applicant is only required to serve notice on the landowner prior to exercising this right. This is also a right that extends beyond the order limits. NH must have control over the operations being carried out on its network and land it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH' consent in the event any access or works under this article effect the SRN or any land NH has an interest in. NH must ensure the safety of its road users and provide prior to approval to those accessing its network. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH objection to this article, which requires the Applicant to obtain NH consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below	
NH27	Article/Schedule: Article 21 Summary of the Applicant's Drafting: (1) The undertaker may— (a) acquire compulsorily so much of the Order land as is required for the authorised development or to facilitate, or as is incidental, to it; and	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme.



Reference number	Representation	Applicant response
	(b) use any land so acquired for the purpose authorised by this Order or for any other purposes in connection with or ancillary to the authorised development. (2) This article is subject to article 22 (time limit for exercise of authority to possess land temporarily or to acquire land compulsorily), article 24 (compulsory acquisition of rights) and article 31 (temporary use of land for constructing the authorised development).. NH Comments: Given that the article enables the undertaker to acquire compulsorily so much of the Order land as is required for the authorised development etc and to use that land so acquired, if that included any part of NHs SRN, NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities effect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH' objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 21 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 21 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.
NH28	Article/Schedule: Article 24 Summary of the Applicant's Drafting: (1) Subject to paragraph (2) and article 31 (temporary use of land for constructing the authorised development), the undertaker may acquire compulsorily such rights over the Order land or impose such restrictive covenants over the Order land as may be required for any purpose for which that land may be acquired under article 21 (compulsory acquisition of land), by creating them as well as by acquiring rights already in existence. (2) Subject to the provisions of this paragraph, article 25 (private rights) and article 33 (statutory undertakers), in the case of the Order land specified in column 1 of the table in Schedule 9 (land in which only new rights etc. may be acquired) the undertaker's powers of compulsory acquisition are limited to the acquisition of existing rights and benefit of restrictive covenants over that land and the creation and acquisition of such new rights and the imposition of restrictive covenants for the purpose specified in relation to that land in column 2 of the table in that Schedule. NH Comments: As referred to at paragraph 4 above NH requires further information in relation to the apparatus being installed for which the rights are being acquired over the SRN and land NH has an interest in. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH' consent in the event the activities effect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of NH's proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 24 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 24 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.



Reference number	Representation	Applicant response
	Inclusion of paragraph 7(2) of NH' proposed protective provisions would address NH' objection to this article, which requires the Applicant to obtain NH consent before exercising their right under this article.	
NH29	Article/Schedule: Article 27 Summary of the Applicant's Drafting: (1) Any authorised activity which takes place on land within the Order limits (whether the activity is undertaken by the undertaker or by any person deriving title from the undertaker or by any contractors, servants or agents of the undertaker) is authorised by this Order if it is done in accordance with the terms of this Order, notwithstanding that it involves— (a) an interference with an interest or right to which this article applies; or (b) a breach of a restriction as to the user of land arising by virtue of a contract. (2) The interests and rights to which this article applies include any easement, liberty, privilege, right or advantage annexed to land and adversely affecting other land, including any natural right to support and include restrictions as to the user of land arising by virtue of a contract. NH Comments: It seems this article permits the Applicant to interfere with any right or interest NH may have within the order limits. This raises a concern however it is not clear whether there will be a temporary interference or permanent extinguishment of NH' interests. Please can the Applicant confirm how this is going to apply relating to NH' interests. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH' consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH' proposed protective provisions would address NH' objection to this article, which requires the Applicant to obtain NH consent before exercising their right under this article	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 27 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 27 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO. In relation to National Highways' query regarding how this article will apply in relation to National Highways' interests (i.e. temporary interference or permanent extinguishment), the Applicant confirms that there will be no permanent extinguishment of National Highways' interests, as the relevant works are temporary in nature (lasting a matter of days).
NH30	Article/Schedule: Article 30 Summary of the Applicant's Drafting: (1) The undertaker may enter on, appropriate and use so much of the subsoil of or airspace over any street within the Order limits as may be required for the purposes of the authorised development and may use the subsoil or airspace for those purposes or any other purpose ancillary to the authorised development. NH Comments: This article provides the Applicant with the power to enter and use the subsoil or airspace over any part of NH' network within the order limits without NH' consent. NH would not permit uncontrolled oversailing or works underneath its network which would originally have the protection of a section 50 pursuant to the New Roads and Street Works Act 1991. NH would need to give consideration to the safety	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 30 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 30 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.



Reference number	Representation	Applicant response
	implications of such work and its interface with NH' assets. NH would expect to have an approval role. NH must have control over the operations being carried on its network. NH require control over the subsoil vested in it and airspace over the SRN. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH' consent in the event the activities effect the strategic road network or any land or airspace NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH' proposed protective provisions would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	
NH31	Article/Schedule: Article 31 Summary of the Applicant's Drafting: The undertaker may, in connection with the construction of the authorised development but subject to article 22 (time limit for exercise of authority to possess land temporarily or to acquire land compulsorily)— (a) enter on and take temporary possession of— (i) so much of the land specified in column (1) of the table in Schedule 11 (land of which temporary possession may be taken) for the purpose specified in relation to the land in column (2) of that table; and (ii) any other Order land in respect of which no notice of entry has been served under section 11(b) of the 1965 Act (powers of entry) and no declaration has been made under section 4(c) of the 1981 Act (execution of declaration); (b) remove any buildings, structures, agricultural plant and apparatus, electric lines, drainage, fences, debris and vegetation from that land; (c) construct temporary works (including means of access), haul roads, security fencing, bridges, structures and buildings on that land; (d) use the land for the purposes of a temporary working site with access to the working site in connection with the authorised development; (e) construct any works on that land as are mentioned in Schedule 1 (authorised development); and (c) carry out mitigation works on that land required under the requirements in Schedule 2 (requirements). NH Comments: This article provides the Applicant with the power to take temporary possessions of the land referred to in schedule 11 and any other order land without the consent of NH. Schedule 11 includes plots of land that NH have an operational interest in. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore,	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which the Applicant considers would address National Highways' concern in relation to this article as that paragraph addresses the Applicant being required to seek National Highways' consent in the event the activities affect the strategic road network or any land National Highways has an interest in. The Applicant also notes that the relevant wording in article 31 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 31 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.



Reference number	Representation	Applicant response
	the Applicant should be required to obtain NH's consent in the event the activities effect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent.	
NH32	Article/Schedule: Article 32 Summary of the Applicant's Drafting: The undertaker may, at any time during the maintenance period relating to any part of the authorised development— (a) enter on and take temporary possession of any land within the Order limits if such possession is reasonably required for the purpose of maintaining the authorised development; (b) enter on any land within the Order limits for the purpose of gaining such access as is reasonably required for the purpose of maintaining the authorised development; and (c) construct such temporary works (including the provision of means of access) and buildings on the land as may be reasonably necessary for that purpose. NH Comments: This article grants the Applicant with the right to take temporary possession of any land within the order limits without the consent of NH, during the maintenance period. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH' consent in the event the activities effect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH objection to this article, which requires the Applicant to obtain NH consent before exercising their right under this article.	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of NH's proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 32 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 32 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.
NH33	Article/Schedule: Article 33 Summary of the Applicant's Drafting: Subject to the protective provisions of Schedule 15 (Protective Provisions) the undertaker may – (a) Acquire compulsorily, or acquire new rights or impose restrictive covenants over, the land belonging to statutory undertakers shown on the land plan within the Order land; and (b) Extinguish the rights of, remove, relocate the rights of or reposition the apparatus belonging to statutory undertakers over or within the Order land. NH Comments: NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body,	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 33 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 33 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.



Reference number	Representation	Applicant response
	NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH' proposed protective provisions would address NH' objection to this article, which requires the Applicant to obtain NH consent before exercising their right under this article.	
NH34	Article/Schedule: Article 34 Summary of the Applicant's Drafting: This article governs what happens to statutory utilities apparatus under streets that are closed, altered or diverted by the order. NH Comments: The article specifically refers to articles 8, 10, 11 and 12. As noted in relation to those articles, NH requires further information to assess the impact of the scheme on its interests. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH' consent in the event the activities effect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH' proposed protective provisions would address NH objection to this article, which requires the Applicant to obtain NH consent before exercising their right under this article	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 34 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 34 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.
NH35	Article/Schedule: Article 40 Summary of the Applicant's Drafting: Subject to article 41 (trees subject to tree preservation orders), the undertaker may fell or lop any tree or shrub near any part of the authorised development or cut back its roots, if it reasonably believes it to be necessary to do so to prevent the tree or shrub from— (a) obstructing or interfering with the construction, maintenance or operation of the authorised development or any apparatus used in connection with the authorised development; (b) constituting a danger to persons using the authorised development; (c) obstructing or interfering with the passage of construction vehicles to the extent necessary for the purposes of constructing the authorised development. NH Comments: This article provides the Applicant with the power to fell or lop any tree or shrub near any part of the authorised development. NH have environment mitigation commitments that may be affected by the authorised development and may put NH in breach of its own statutory obligations. In any event Hedge CRH170 (hedgerow) and CRH173 (important hedgerow) (as shown on the TPO and Hedgerow Plan Sheet 9 of 23) are located on the boundary of the network. In addition, whilst not immediately adjacent to the boundary, it is	The Applicant welcomes further discussion with National Highways regarding the works within Work No. 5A that may impact CRH170, CRH173 and CRH172. In any event, however, the Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 41 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 41 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO. The Applicant has not been made aware of any land within the Order limits forming part of National Highways' BNG commitments – however, the Applicant welcomes further discussion with National Highways on these BNG commitments and any consequential updates required.



Reference number	Representation	Applicant response
	noted that CRH172 (important hedgerow) is close by. Further clarity from the Applicant is needed on the works within Works No 5A that may impact CRH170, CRH173 and CRH172 so that NH can assess the impact on all of these hedgerows cumulatively. NH object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of NH' proposed protective provisions. This would address NH objection to this article, which requires the Applicant to obtain NH consent before exercising their right under this article. If works undertaken to trees affect any NH BNG commitments a replacement tree or trees would need to be provided to satisfy that existing commitment at a location to be agreed.	
NH36	Article/Schedule: Article 47 Summary of the Applicant's Drafting: (4) Save for applications made pursuant to Schedule 16 and where stated to the contrary if, within six weeks (or such longer period as may be agreed between the undertaker and the relevant consenting authority in writing) after the application or request has been submitted to a consenting authority it has not notified the undertaker of its disapproval and the grounds of disapproval, it is deemed to have approved the application or request. NH Comments: Sub- paragraph 4 of article 47 includes deemed approval which is granted where NH does not provide its consent or approval to any provisions under the order within 6 weeks of it being requested where no response is received. 6 weeks is not considered a reasonable period of time to consider every application that may come through under this DCO, some may be more involved than others. 8 weeks would be considered reasonable In any event, NH is concerned with the deemed consent given the safety implications of works being carried out to or under the strategic road network that may have bypassed its approval processes. This is a fundamental issue of public safety that should not be compromised to enable a private developer to achieve a quicker build programme. NH has statutory obligations to behave reasonably and support sustainable development and so it should not be forced to work under the pressure of deemed consent. The potential implications from a safety perspective of something going wrong far outweigh the Applicant's case for such a provision Inclusion of paragraph 7(7) of NH proposed protective provisions at Appendix 1 would address NH concerns which would seek to disapply article 47 in the context of any consent relating to the strategic road network. The effect of this is to prevent the Promoter from exercising powers over the SRN or land in which NH has an interest without deemed consent applying. The justification is to ensure open dialogue between the parties so that NH has control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. As a public body, NH is under a duty to act reasonably and this is expressly provided in - paragraph 7(4) of NH's protective provisions	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. The Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(7) of National Highways' proposed protective provisions, which National Highways state will address their objection to this article. The Applicant also notes that the relevant wording in article 47 of the draft DCO [APP/3.1.1] is identical to the corresponding wording in article 47 of the Green Hill Solar Farm DCO, which was agreed by National Highways during the examination of that DCO.



Reference number	Representation	Applicant response
NH37	Article/Schedule: Schedule Summary of the Applicant's Drafting: <u>Requirement 3</u> (1) The undertaker may submit any amendments to any approved document to the relevant planning authority for approval in consultation with NH and, following approval, the relevant approved document is to be taken to include the amendments approved under this paragraph. NH Comments: NH should be given an opportunity to review any variations to the approved documents and plans to ensure that any changes do not adversely impact the SRN. This is in the interest of maintaining the safe and efficient operation of the SRN Inclusion of drafting in red would address NH's concern.	The Applicant understands that an approach to consultation with National Highways under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with National Highways. The Applicant therefore proposes that, should that agreement be reached, it will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to replicate the relevant wording of those Requirements.
NH38	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: <u>Requirement 5</u> No part of *the authorised development* ~~Work Nos. 1, 2 or 3A~~ may commence until details of— (a) the layout; (b) scale; (c) proposed finished ground levels; (d) external appearance; (e) hard surfacing materials; and (f) vehicular and pedestrian access, parking and circulation areas, relating to that part have been submitted and approved by the relevant planning authority for that part. *Works must be carried out in accordance with The Design Manual for Roads and Bridges (DMRB). NH Comments: This requirement should be expanded to include reference to all work no's that include the works across the A27 that will also require the approval of NH prior to the commencement of those works. In addition, the works must be in accordance with DMRB standards. The following amendments to the drafting in red would address NH's concern.	The Applicant does not consider that National Highways' proposed amendments to the draft DCO [APP/3.1.1] are necessary. Article 14(c) of the draft DCO [APP/3.1.1] states that the Applicant may, for the purposes of the authorised development, "<i>with the approval of the relevant planning authority after consultation with the highway authority, form and lay out such other means of access or improve existing means of access, at such locations within the Order limits as the undertaker reasonably requires for the purposes of the authorised development</i>". This, therefore, ensures that National Highways is consulted by the relevant planning authority in relation to such works, as is standard practice across made solar DCOs. In relation to National Highways' request that the relevant works must be in accordance with DMRB standards, the Applicant confirms that it will update the oCTMP [APP/7.7.1] to secure this commitment.
NH39	Article/Schedule: Schedule2 Summary of the Applicant's Drafting: <u>Requirement 7 (1)</u> No part of the authorised development may commence until a written landscape and ecological management plan has been submitted to and approved by the relevant	The Applicant understands that an approach to consultation with National Highways under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with National Highways. The Applicant therefore proposes that, should that agreement be reached, it will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to replicate the relevant wording of those Requirements.



Reference number	Representation	Applicant response
	planning authority in consultation with NH for that part in consultation with the relevant statutory nature conservation body. NH Comments: NH should be given an opportunity to review the landscape and ecological management plan, arboricultural assessment/tree protection measures and any replanting proposals in respect of NH's soft estate.	
NH40	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: <u>Requirement 8</u> (1) Prior to the date of final commissioning for any part of the authorised development, an operational traffic management plan for that part must be submitted to and approved by the relevant planning authority in consultation with NH. NH Comments: NH should be given the opportunity to review the details proposed. Inclusion of drafting in red would address NH's concern.	The Applicant understands that an approach to consultation with National Highways under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with National Highways. The Applicant therefore proposes that, should that agreement be reached, it will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to replicate the relevant wording of those Requirements.
NH41	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: <u>Requirement 10</u> (1) No part of the authorised development may commence until written details of all proposed temporary fences, walls or other means of enclosure, including those set out in the construction environmental management plan, for that part have been submitted to and approved by the relevant planning authority in consultation with NH. (2) No part of the authorised development may commence until written details of all permanent fences, walls or other means of enclosure for that part have been submitted to and approved by the relevant planning authority in consultation with NH. NH Comments: NH should be given the opportunity to review the details of any proposed fences, walls or enclosures if within the vicinity of the SRN for reasons of safety, liability, and maintenance and to ensure compliance paragraph 57 of DfT Circular 01/2022 which sets out any structures "must be located outside of the highway boundary of the SRN. In general terms, structures should be sited sufficiently far from the highway boundary of the SRN so that they cannot topple on to the SRN or undermine its geotechnical integrity" Inclusion of drafting in red would address NH's concern.	The Applicant understands that an approach to consultation with National Highways under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with National Highways. The Applicant therefore proposes that, should that agreement be reached, it will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to replicate the relevant wording of those Requirements.
NH42	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: <u>Requirement 11</u>	The Applicant understands that an approach to consultation with National Highways under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with National Highways. The Applicant therefore proposes that, should that agreement be reached, it will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to replicate the relevant wording of those Requirements.



Reference number	Representation	Applicant response
	(1) No part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and approved by the relevant planning authority in consultation with the Environment Agency and Anglian Water Services Limited or its successor in function as the relevant water undertaker and NH. NH Comments: NH should be given the opportunity to review the details of the surface water and foul water drainage system to ensure the integrity of the SRN drainage infrastructure is not interfered with and that any plans are in accordance with DfT Circular 01/2022. Please see NH comments at article 17 above. Particular attention must be given where the drainage is adjacent to the SRN or NH land, as changes in water management could directly affect the SRN asset. No surface water run-off from the development shall be discharged into the SRN drainage systems. No new drainage connections from third-party developments will be permitted Inclusion of drafting in red would address NH's concern.	
NH43	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: <u>Requirement 13</u> No part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority in consultation with NH. NH Comments: NH should be given an opportunity to review the CEMP to ensure appropriate safeguards are implemented and maintained, with consideration of potential impacts on the SRN. Inclusion of drafting in red would address NH's concern.	The Applicant understands that an approach to consultation with National Highways under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with National Highways. The Applicant therefore proposes that, should that agreement be reached, it will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to replicate the relevant wording of those Requirements.
NH44	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: <u>Requirement 14</u> (1) Prior to the date of final commissioning for any part of the authorised development, an operational environmental management plan for that part must be submitted to and approved by the relevant planning authority in consultation with NH. NH Comments: NH should be given the opportunity to review the details of the operational environment management plan to ensure the management of long-term environmental risks associated with the site and ensure ongoing protection of the SRN. Inclusion of drafting in red would address NH's concern.	The Applicant understands that an approach to consultation with National Highways under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with National Highways. The Applicant therefore proposes that, should that agreement be reached, it will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to replicate the relevant wording of those Requirements.
NH45	Article/Schedule: Schedule 2	The Applicant understands that an approach to consultation with National Highways under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with National Highways. The



Reference number	Representation	Applicant response
	Summary of the Applicant's Drafting: <u>Requirement 15</u> (1) No part of the authorised development may commence until a construction traffic management plan for that part must be submitted to and approved by the relevant planning authority in consultation with NH. (2) The construction traffic management plan must be substantially in accordance with the outline construction traffic management plan. (3) Before approving the construction traffic management plan the relevant planning authority must consult with the relevant highway authority and NH. NH Comments: NH should be given the opportunity to review the details of the construction traffic management plan to ensure the management of long-term environmental risks associated with the site and ensure ongoing protection of the SRN. Inclusion of drafting in red would address NH's concern.	Applicant therefore proposes that, should that agreement be reached, it will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to replicate the relevant wording of those Requirements.
NH46	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: <u>Requirement 20</u> (5) No decommissioning works must be carried out until the relevant planning authority has approved the decommissioning plan submitted in relation to those works, in consultation with the Environment Agency and NH NH Comments: NH should be given the opportunity to review the details of the decommissioning plan. This should include a transport assessment and construction environmental impacts to ensure that the decommissioning process will not adversely affect the SRN. This is particularly important where restoration to previous site use is proposed. Inclusion of drafting in red would address NH's concern.	The Applicant understands that an approach to consultation with National Highways under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with National Highways. The Applicant therefore proposes that, should that agreement be reached, it will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to replicate the relevant wording of those Requirements.
NH47	Article/Schedule: Schedule 16 Summary of the Applicant's Drafting: Paragraph 3 of this schedule, Further Information and consultation, states 3.— (1) In relation to any application to which this Schedule applies, the relevant planning authority may request such reasonable further information from the undertaker as is necessary to enable it to consider the application. (2) In the event that the relevant planning authority considers such further information to be necessary and the provision governing or requiring the application does not specify that consultation with a requirement consultee is required, the relevant planning authority must, within 10 working days of receipt of the application, notify the undertaker in writing specifying the further information required. (3) If the provision governing or requiring the application specifies that consultation with a requirement consultee is required, the relevant planning authority must issue the consultation to the requirement consultee within 5 working days of receipt of the	The Applicant understands that an approach to the wording of paragraph 3 of Schedule 16 of the Green Hill Solar Farm DCO is nearly agreed with National Highways. The Applicant therefore proposes that, should that agreement be reached, it will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to replicate the relevant wording of this Schedule.



Reference number	Representation	Applicant response
	application, and must notify the undertaker in writing specifying any further information the relevant planning authority considers necessary or that is requested by the requirement consultee within 5 working days of receipt of such a request and in any event within 15 working days of receipt of the application (or such other period as is agreed in writing between the undertaker and the relevant planning authority). (4) In the event that the relevant planning authority does not give notification as specified in sub-paragraph (2) or (3) it is deemed to have sufficient information to consider the application and is not thereafter entitled to request further information without the prior agreement of the undertaker. (5) Where further information is requested under this paragraph in relation to part only of an application, that part is to be treated as separate from the remainder of the application for the purposes of calculating time periods in paragraph 2 and paragraph 3. NH Comments: The definition of "requirement consultee" means any body or authority named in a requirement as a body to be consulted by the relevant planning authority in discharging that requirement. NH is therefore a requirement consultee. The timetable for the LPA requesting further information in paragraph 3(3), if missed by the LPA could adversely affect NH as a requirement consultee. If LPA does not request the further information in time, it is deemed to have sufficient information to consider the application which could, in turn, mean that NH are not given the opportunity to comment on the same which is effectively deemed consent. 5 days is not long enough, and in any event the provisions of 3(4) are considered disproportionate and NH cannot agree to the same. At least 28 days would be a more reasonable period.	
NH48	6. Additional interface The Authorised Development will also interface with the Strategic Road Network in the following way: The impact of the Proposed Development on the SRN	The Applicant acknowledges that there is an interface between the Scheme and the SRN. ES Chapter 9: Transport and Access [APP/6.2.1] assesses the anticipated transport and access effects of the Scheme's construction, operation and decommissioning. ES Chapter 9: Transport and Access [APP/6.2.1] concludes that with the mitigation measures in place, secured through the oCTMP [APP/7.7.1] and oOTMP [APP/7.9.1], there are no residual transport and access-related effects expected across the Scheme's construction, operation and decommissioning phases.
NH49	6.2. Traffic and Transport 6.2.1 NH requires junction impact assessments to be undertaken on junctions experiencing an increase of 30 additional trips during the peak periods. It is noted that the peak daily construction traffic figures (Tables 5.3 through 5.5 in Transport Assessment (Volume 2 Appendix 9-1, APP-101)) are likely to be in excess of this. 532 LGVs, including staff and smaller delivery trips, and 96 HGVs are forecasted to access the site across the day. Whilst it is accepted that a proportion of the trips will take place outside of the traditional peak periods no trip distribution has been presented so it is unclear whether there could be an impact on the SRN. 6.2.2 NH therefore requests that the Applicant provides additional explanation concerning the expected impact on the A47 Junctions, including the A47/A1065 and A47/Narborough Road during the peak hours to confirm if further assessment (modelling) is required. It is also noted that if significant impact occurs just outside the peak hours could see a shift in the peak hours. The level of impact would	As detailed within section 4 of ES Appendix 9.2: Traffic Assessment [APP-163], the majority of the non-HGV trips comprising staff would take place prior to 07:00 and after 18:00, so would be outside the typical network peak hours. As a worst-case assumption, this could be 266 trips in the morning and 266 in the evening, though these trips likely represent the peak over a period of months, rather than for the full length of construction, so outside of this the impact is likely to be lower. It is confirmed that there will be no additional vehicle trips on the SRN during the peak hours, as all staff will have arrived or departed outside of these hours and any deliveries from HGVs or LGVs will be restricted to avoid the AM peak (08:00-09:00) and PM peak (17:00-18:00) hours. As the threshold of 30 additional vehicle trips during the network peak periods (typically 08:00-09:00 and 17:00-18:00) is therefore not exceeded, no junction impact assessments have been undertaken. The impact is also only temporary when construction is taking place, so once operational the additional vehicle demand from the Scheme on the SRN will be negligible. The restrictions on vehicle timings will be secured through the detailed Construction Traffic Management Plan that is secured by way of requirement in draft DCO [APP/3.1.1] and in the oCTMP [APP/7.7.1] that is submitted as part of the DCO submission.



Reference number	Representation	Applicant response
	ordinarily warrant further analysis of junction performance due to the significant volume of trips presented.	
NH50	6.3 Construction Management <i>Outline Construction Environmental Management Plan</i> 6.3.1 Section 2.2 of the OCEMP states that the construction of the proposed development is expected to take approximately 24 months, with construction anticipated to commence in mid- 2031 and be completed in by end of 2033. 6.3.2 It is assumed that HGV movements would be distributed across the 11-hour period between 7am and 6pm, therefore could be scheduled to arrive and depart the site outside the traditional peak hours. Whilst this could be achievable with timed deliveries, NH requires a monitoring regime and measures to ensure that this can be accommodated and enforced if persistent breaches occur. This is stated as to be provided in “the final CEMP”. However, NH requests that further detail concerning the monitoring regime are provided in the OCEMP, consistent with other consented DCOs.	At National Highways' request, details of the monitoring strategy for HGV and other vehicle movements is to be provided within the updated oCTMP [APP/7.7.1] to be provided at Deadline 1. Whilst the comment relates to the oCEMP [APP/7.6.1], it is considered more appropriate for the monitoring protocol for construction vehicles to be set out within the oCTMP [APP/7.7.1] as it relates to construction vehicle traffic and the expected numbers of construction vehicles, as well as the protocol for enforcement and action in the event that the monitoring requirements are not adhered to.
NH51	6.3.3 NH welcomes the consideration of sustainable travel in the OCEMP and the intention to produce a Construction Travel Plan. It is recognised that both lift sharing and a shuttle bus service are appropriate measures to be included in such a plan. However, NH does not consider that sufficient detail has been provided at this stage and would expect to see a more detailed outline Construction Workforce Travel Plan as part of the DCO application, in common with other submitted and consented DCOs. Specifically, NH requests that more detail is provided in respect of control measures and enforcement, particularly regarding timescales for corrective measures to be implemented. Further, the CTMP refers to the involvement of local highway authorities but should also be explicit in NH's role in ensuring that the CTMP is not breached and that safety at the junctions with the A47 are not compromised with, for example, queuing back onto the mainline.	At National Highways' request, an Outline Travel Plan will be submitted at Deadline 1, to form an appendix to the oCTMP [APP/7.7.1] as the impacts primarily relate to construction. A detailed Travel Plan will be secured by way of requirement in the draft DCO [APP/3.1.1] as an appendix to the detailed Construction Traffic Management Plan. Regarding the detail National Highways has requested in regard to enforcement and control measures and timescales for corrective measures, further detail on this alongside the updated monitoring protocol is included in the updated oCTMP [APP/7.7.1] and secured via a requirement in the draft DCO [APP/3.1.1]. The updated oCTMP [APP/7.7.1] secures the relevant traffic management measures, such as the restrictions on delivery timings to avoid peak hours, to ensure that the junctions with the A47 are not compromised as per the National Highways request.
NH52	6.3.4 Table 4 identifies a number of mitigation or enhancement measures which may be required as part of the scheme. It is noted that the use of signage is identified as one of these measures, however, no information has been provided to identify where the proposed signs would be located. NH will need to agree any proposed signage to be located on the Strategic Road Network, and based on the construction period, will require a Road Safety Audit.	The details (including location) on the requirement for any signage on the SRN or local highway network will be agreed as part of the detailed Construction Traffic Management Plan, secured by way of a requirement in the draft DCO [APP/3.1.1], with input from the appointed contractor on the traffic management needed. The location and specification of the signage will be agreed with the relevant highway authority (namely National Highways and Norfolk County Council), secured initially through the oCTMP [APP/7.7.1].
NH53	6.3.5 Table 4 also identifies the requirement for a Road Condition Survey to be carried out on the Local Road Network before the construction phase commences. The purpose of the survey is to identify highways defects resulting from construction activities from the scheme. NH requests the extents of the condition survey extend to include the full construction routes and therefore include the junctions with the SRN (A47/A1065 and A47/ Narborough Road). These junctions forming part of the construction routes to the proposed development will experience an increase in turning movements, likely from Heavy Goods Vehicles, therefore there is a risk of damage from these movements.	Section 5.2 of the oCTMP [APP/7.7.1] confirms that the condition survey will include the routes for construction vehicles, with the scope of the condition surveys referred to by National Highways included in the updated version of the oCTMP [APP/7.7.1] that is proposed to be secured by way of requirement in the draft DCO [APP/3.1.1].
NH54	<i>Outline Construction Traffic Management Plan</i>	The level of vehicle trips set out in the oCTMP [APP/7.7.1] will set the cap for daily vehicle activity, which will form part of the contractor's contract and the DCO. Without written consent of the relevant highway authorities



Reference number	Representation	Applicant response
	6.3.6 Paragraph 3.1.2 of the OCTMP states that "For the construction of the Scheme, it is expected that there will be a daily total of 628 two-way vehicle trips, comprising 96 two-way Heavy Goods Vehicles ('HGVs', 48 HGVs arriving and departing) and 532 cars / Light Goods Vehicles ('LGVs', equivalent to 266 cars / LGVs arriving and departing) into the Scheme on any day." 6.3.7 Paragraph 3.1.7 goes on to state that "A more detailed programme for expected vehicle trips will be provided by the contractor within the detailed CTMP prior to commencement." Whilst this approach is not considered unacceptable by NH, if development trips were to increase beyond the volume described in the OCTMP, the impact on the SRN may require a reassessment.	or amending of the DCO, the contractor will not be allowed to exceed these thresholds as secured in the oCTMP [APP/7.7.1]. The approach to the monitoring of vehicle trips is initially set out within the oCTMP [APP/7.7.1], though further detail will be secured through the detailed Construction Traffic Management Plan that is secured by way of a requirement on the draft DCO [APP/3.1.1]. The updated oCTMP [APP/7.7.1] submitted at Deadline 1 includes further information on the monitoring mechanisms and strategy. This approach therefore ensures that the impact of the Scheme remains consistent with the assessments presented within the ES Chapter 9: Transport and Access [APP/6.2.1] and does not exceed these thresholds for vehicle trips.
NH55	6.3.8 Section 6.2 of the OCTMP looks at measures to reduce vehicle trips. NH welcomes the deployment of measures to such as car sharing to the site and notes the Applicant is assuming a car/van occupancy of 1.5. It is noted that this is a higher car share assumption than the figure of 1.4 which has been commonly used as the basis for travel planning on several recent consented and live DCOs for energy projects in rural locations. A car share assumption of 1.4 would result in an increase in the number of vehicles accessing the site, predominantly via the A47. Measures such as how car sharing and the use of the shuttle bus service will be encouraged and implemented will be included within a Travel Plan, which will be secured by use of a Requirement. In addition, NH requests that more detail is provided in respect of control measures and enforcement, particularly regarding timescales for corrective measures to be implemented.	The Applicant notes that the car sharing factor of 1.5 has been utilised and accepted on a number of other comparable consented solar DCOs, including West Burton Solar Project and Cottam Solar Project. The measures to ensure that sustainable travel is promoted and the impact to the A47 is minimised are confirmed within the proposed Outline Travel Plan that has been prepared, that is to be secured by way of a requirement in the DCO as an appendix to the oCTMP [APP/7.7.1] and will form part of the contractor's contract. Measures will include the promotion of car sharing and shuttle buses will be confirmed once the phasing of works is confirmed and the number and location of staff accommodation is known. To provide additional reassurance to National Highways, an Outline Travel Plan has been prepared as an appendix to the updated oCTMP [APP/7.7.1]. The cap on daily vehicles (for both HGVs and other vehicles) is secured through the oCTMP [APP/7.7.1] and the DCO, which the contractor will need to comply with in their contract, forming an obligation to ensure that the vehicle thresholds are not exceeded. Regarding the detail National Highways has requested in regard to enforcement and control measures, including timescales for corrective measures, is included in the updated oCTMP [APP/7.7.1] and secured via requirement in the DCO.
NH56	6.3.9 Notwithstanding the need to agree a final construction workforce travel plan with the appointed contractor and with a better understanding of the workforce characteristics, NH requires additional assurance through a more detailed outline plan as part of the consented DCO that staff will not simply be encouraged to use sustainable modes but that such measures will be actively enforced and that sufficient remedies are available should the target not be achieved.	At National Highways' request, an Outline Travel Plan has been prepared at Deadline 1 as an appendix to the oCTMP [APP/7.7.1]. The updated oCTMP [APP/7.7.1] will include details on enforcement and control measures to ensure that the proposed strategies within the Outline Travel Plan are actively enforced, alongside the protocol for resolving any issues should the targets not be achieved, to provide suitable reassurance to National Highways that the measures will be implemented.
NH57	6.3.10 It is noted that Requirement 15 into the DCO states that the final Construction Traffic Management Plan for each stage of construction will be submitted to the Local Planning Authority "in consultation with the relevant highway authority". NH request that this is amended to "in consultation with the relevant highway authority or authorities", reflecting NH's status as the highway authority for the SRN and for circumstances where NH will need to be consulted as well as the local highway authority.	The Applicant refers to its response to NH45 above on this matter.
NH58	Abnormal Indivisible Loads 6.3.11 It is stated in Chapter 7 of the OCTMP that a number of Abnormal Indivisible Loads (AIL) would be required during the construction of the proposed development. These are anticipated to be routed via the A47. Please note that NH follows a government Water Preferred Policy, which means we would expect the loads to arrive via the nearest suitable port of entry. It is noted that the AIL route strategy for	The Applicant notes this comment. Details on the AILs are secured through the oCTMP [APP/7.7.1] that is secured by way of requirement in the DCO. The AIL application will be managed by the contractor and agreed with National Highways prior to commencement of construction in the event the DCO is granted consent.



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	the proposed scheme has been agreed in principle with NH's however, it should also be noted that the final route strategy is subject to approval using the ESDAL system. Changes required as part of the ESDAL process and application supersede previous in principle agreements.	
NH59	6.3.12 To obtain approval for AIL movements, NH must be contacted 8–10 weeks prior to the planned movement, at which point the haulier should initiate contact. During this period, route suitability will be reassessed in coordination with all relevant structure owners and highway authorities. An application must then be submitted to NH, and if approved, the permit will be valid for six months. The Applicant should note that there remains a legal obligation to notify us of the exact date and time of each movement at least 5 days in advance.	The Applicant notes this comment. The relevant procedural timelines for the AIL application are noted. This process will be managed by the contractor and agreed with National Highways prior to commencement of construction in the event the DCO is granted consent. Details on the AILs are secured through the oCTMP [APP/7.7.1] that is secured by way of requirement in the DCO
NH60	6.3.13 It is expected that a series of minor works are required on the junction of the A47/A1065 to accommodate the AIL movements. Whilst these have been presented to NH and have been accepted in principle, the applicant has yet to carry out Road Safety Audit. All the works are subject to completion to a Road Safety Audit, and any recommendations identified will need to be addressed with suitable alternatives. The works will also require technical approval for Detailed Design.	The Applicant notes this comment. It is accepted that a Road Safety Audit (RSA) would be undertaken in the future in the event the DCO is granted consent, as part of the future AIL application for any temporary works required on the SRN. The scope of the RSA would be agreed with National Highways representatives in advance. The RSA and Abnormal Indivisible Loads are secured through the oCTMP [APP/7.7.1] that is secured by way of requirement in the draft DCO [APP/3.1.1] .
NH61	6.4 Decommissioning 6.4.1 It is noted that Requirement 20 (point 4) of the DCO refers to the Decommissioning Strategy and states that this will be agreed with the relevant local planning authorities. NH requests that this is amended to include NH as the highway authority responsible for the safe operation of the SRN. As part of the discharge of this requirement, it is expected that a Decommissioning Traffic Management Plan (DTMP) will be developed by a contractor prior to the commencement of the decommissioning period.	The Applicant refers to its response to NH45 above on this matter.
NH62	7. Protective Provisions 7.1 In order to facilitate the withdrawal of NH's objection to the DCO and Authorised Development, NH requests that the Applicant includes the NH protective provisions at Appendix 1 to the draft Order at the next deadline. A full justification for each of the key provisions and definitions is set out below:	The Applicant notes that National Highways has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, during the course of the examination of that DCO. The Applicant will discuss with National Highways as to whether the same approach is agreed for this Scheme, and (if so) would therefore update the draft DCO [APP/3.1.1] to mirror the wording of those protective provisions. At such time, the Applicant would hope that National Highways can withdraw its objection to the Scheme. Therefore, the Applicant does not propose to respond in detail to each aspect of the protective provisions set out by National Highways below; rather, it will follow the approach set out above and anticipates reaching agreement with National Highways on the form of protective provisions at an early stage of examination.
NH63	Paragraph: 1 Heading: Application Justification: This provision has effect to preserve the statutory powers and duties of NH except where expressly amended by the Order.	See response to NH62 above.
NH64	Paragraph: 2 Heading: Interpretation Justification:	See response to NH62 above.



Reference number	Representation	Applicant response
	Key provisions: “as built information” – contains the relevant information required by NH in order to issue the provisional certificate, certifying that works in, on under or over the SRN are satisfactorily complete and safe from NH's perspective. “bond sum” – this provides that a bond sum required is 200% of the cost of the specified works in, on under or over the SRN. The bond required is not the total cost of the works but rather the section of works specifically impacting the SRN. Much in the same way as a section 278 agreement, bonding is required to protect NH from financial liability in the event that the Applicant defaulted on the works which impact the SRN. “commuted sum” – provision of financial security to NH for any assets which require ongoing maintenance. Where the authorised development includes works which will require ongoing maintenance, this should be funded by the Applicant and not become a burden on the public purse. “detailed design information” – contains the relevant information required by NH in order to approve the commencement of the specified works affecting the SRN. In the experience of NH's highway engineers, this definition includes all necessary drawings, specifications and calculations required for signing off works in, on, under or over the SRN but may need to be supplemented depending on the nature of the project. “road space booking” – NH has a strict procedure for managing network occupancy to ensure that they are aware of who is working on the SRN at any given point. It also ensures that sections of the SRN are not subject to conflicting or multiple sets of maintenance work. “specified works” – any work authorised by the order (including maintenance) which is on, in, under or over the strategic road network. Importantly, this covers the highway estate as well as the operational highway land to ensure that works beneath the highway or above it are subject to the same requirements as work to the highway stratum itself. Critically, works which occur under or over the SRN can still have a detrimental operational impact to the functioning of the undertaking and can result in significant safety impacts. “strategic road network” includes all operational land of NH within the order limits and also the highway estate itself to protect the safe functioning of the SRN.	
NH65	Paragraph: 3 Heading: General Justification: Parts of the SRN are routinely managed by design build finance and operate contractors, who have primary responsibility for managing the asset. The purpose of these provisions is to ensure that, where the road subject to the specified works is managed under a DBFO contract, the highway operations and maintenance contractor can take the benefit of the protective provisions. Otherwise, any claim that the highway operations and maintenance contractor had against the Applicant by virtue of its stewardship of the asset would need to be through a claim made by NH and sub-recovered by the DBFO contractor. This is unnecessary, inefficient and creates a contractual risk to NH, as the DBFO contract does not cater for risks occasioned by third party development.	See response to NH62 above.



Reference number	Representation	Applicant response
NH66	Paragraph: 4 Heading: General Justification: To ensure that routine maintenance work to the highway does not compromise the integrity of any assets co-located in the subsoil.	See response to NH62 above.
NH67	Paragraph: 7 Heading: Prior approvals and security Justification: To ensure that the specification of the specified works and all associated processes inc. traffic management, financial provision for ongoing maintenance liabilities, scope of maintenance, condition surveys and road safety audits are addressed prior to commencement of works affecting the SRN. All of this information is required whether the specified works comprise of works to the highway or not. For example, scaffolding erected either side of the highway to install overhead lines would require a scheme of traffic management, as it would not be safe to carry out such dangerous works over an online part of the SRN. Likewise, undergrounding a pipeline or cable via horizontal directional drilling could not take place without condition surveys of the SRN taking place prior to commencement of works, as without this it would be impossible to know whether the specified works had caused subsidence or displacement in the carriageway. NH also requires collateral warranties from any contractor and designer of the specified works affecting the SRN, to ensure appropriate contractual liabilities are recoverable. No exercise of any article set out in 7(2) should take place without the express consent of NH, to ensure that NH is aware of the progress of the specified works affecting the SRN, the scope of those operations, the potential impact to road users and to ensure that compulsory acquisition is managed appropriately and proportionately.	See response to NH62 above.
NH68	Paragraph: 8 Heading: Construction of specified works Justification: The construction of the specified works must be carried out in accordance with NH's road space booking procedures to ensure the safety of road users and other contractors on the network. They must also be carried out in accordance with the relevant technical standards where relevant to the works, to ensure consistency with the SRN. Emergency access is to be granted to NH in the event of or to prevent the occurrence of danger to the public.	See response to NH62 above.
NH69	Paragraph: 9 Heading: Payments Justification: The reasonable costs incurred by NH in the administration of the design approval process, the transfer of land, supervision of works, legal costs and VAT should be payable by the Applicant. But for the Applicant's scheme, NH would not have to expend resources on the specified works.	See response to NH62 above.
NH70	Paragraph: 10 Heading: Provisional Certificate Justification: Where any specified work is proposed to the SRN, on, over or under the highway, the requirements of NH's design checking and approval process is	See response to NH62 above.



Reference number	Representation	Applicant response
	required to be discharged. Works underneath the highway or oversailing it have significant potential to cause damage both to the highway itself and to road users and it is critical to the safe and efficient operation of the SRN that works are signed off by NH engineers as safe, where there is an interface with the SRN. This provision is also required for the purposes of the Applicant as it has the effect of reducing the bond sum to 20% on the issue of the provisional certificate.	
NH71	Paragraph: 11 Heading: Opening Justification: This is relevant only where the SRN has been subject to traffic management orders or temporary closure as a result of the Authorised Development.	See response to NH62 above.
NH72	Paragraph: 12 Heading: Final Condition Survey Justification: Where specified works include horizontal directional drilling, as part of the approval of works and prior to commencement, a condition survey of the highway is required. A final condition survey is required on completion of the horizontal directional drilling works, to identify any settlement of the carriageway in accordance with the threshold levels set out in technical standard DMRB CD622. If any settlement beyond tolerance is identified, this would pose a safety risk to road users, as part of the carriageway would have collapsed to unsafe levels. NH would require this defect to be remedied. This provision also applies to works to the SRN itself as any final condition survey would inform the decision on issue of the final certificate.	See response to NH62 above.
NH73	Paragraph: 13 Heading: Defects Period Justification: On the issue of the provisional certificate, the Applicant will be required to remedy any defect in the SRN caused by the specified works for a period of 12 months. Where NH's network is damaged by works carried out pursuant to the DCO, it is for the Applicant to remedy that damage.	See response to NH62 above.
NH74	Paragraph: 14 Heading: Final Certificate Justification: This provision is required in order to release the bond in full, to ensure that the NH costs are paid by the Applicant and to ensure that NH is given a final opportunity to inspect the SRN and be satisfied that the specified works have not resulted in damage to the statutory undertaking.	See response to NH62 above.
NH75	Paragraph: 15 Heading: Security Justification: The Applicant is proposing to carry out works [to the highway in land owned by NH. These works may be commenced and not completed, may be constructed contrary to the approved design or may be suspended due to the dissolution of the Applicant. In such cases, NH is exposed to a potentially significant financial burden in removing the works from the highway estate.	See response to NH62 above.



Reference number	Representation	Applicant response
	Outside the Planning Act 2008, payment for any works which an authority are authorised to execute (i.e. not just works to the highway itself) may be secured under a section 278 agreement, with such a payment being secured through a bond or cash deposit. In the absence of any commitment by the Applicant to enter into a section 278 agreement containing provisions to put security in place for the benefit of NH, the NH protective provisions require security in a manner which is consistent with the measures applying to developments carried out under the Town and Country Planning Act 1990, applying the provisions of the Highways Act 1980. The NH protective provisions are an appropriate mechanism to assure security such as a bond and without this, NH would be faced with potentially significant financial liabilities for which it is not funded and has no budget.	
NH76	Paragraph: 16 Heading: Commuted Sum Justification: Where the Applicant proposes to install apparatus on the highway, a commuted sum is required to contribute to the maintenance of the apparatus. It is not for the public purse to pay for maintenance of apparatus that is added to the highway estate as a consequence of third party development, without contribution.	See response to NH62 above.
NH77	Paragraph: 17 Heading: Insurance Justification: Insurance is required of all contractors working on the SRN and this should extend to operations carried on over and under the highway due to the potential for damage to infrastructure, highway assets and road users.	See response to NH62 above.
NH78	Paragraph: 18 Heading: Indemnity Justification: NH must be held harmless for the construction, maintenance and operation of the Authorised Development and any resultant impacts and it is common practice for statutory undertakers to be indemnified in such circumstances. It should not be for the public purse to cover instances of loss or damage occasioned by third party works.	See response to NH62 above.
NH79	Paragraph: 19 Heading: Maintenance of specified works Justification: To ensure that where maintenance to a specified work is required, the relevant road space booking procedures are complied with to ensure the safety of contractors and road users.	See response to NH62 above.
NH80	Paragraph: 20 Heading: Land Justification: To ensure that matters of compulsory acquisition are directed to the legal team at NH and to ensure that powers are not exercised by way of GVD circumventing NH's ability to impose restrictions and controls on the use of the land in a way which would impact on the SRN or be detrimental to safety.	See response to NH62 above.



Reference number	Representation	Applicant response
NH81	Paragraph: 21 Heading: Expert Determination Justification: Expert determination is preferred due to the speed of the process and the often technical nature of the points in dispute being more suited to determination by an Engineer or other highway professional.	See response to NH62 above.
NH82	8. Summary 8.1 NH is in a position where it objects to the proposals as contained in the DCO application. Consequently, NH's position is that it is unable to remove its objection unless resolution is reached on all outstanding matters (as raised in this relevant representations) and NH's protective provisions at Appendix 1 are included on the face of the Order prior to the ExA's recommendation to the Secretary of State.	The Applicant notes this comment and is committed to working with National Highways to reach a resolution on all outstanding matters, as responded to above, including an agreed form of protective provisions.
NH83	8.2 Should it assist the ExA, NH will respond to any written questions that the panel may have and is willing to attend an appropriate hearing to detail the impacts of the Authorised Development to NH.	The Applicant notes this comment and thanks National Highways for its representation.



3.8 AS-060, Historic England

Reference number	Representation	Applicant response
HE1	1) General Comments The site lies between Swaffham and Nar River valley along which there are a series of villages including South Acre and Castle Acre. There are a number of designated heritage assets here and within the surrounding landscape. Of particular importance is Castle Acre which has a remarkable history and lies to the north of the site. At its northern end survives the Castle and to the south the Priory, both dating from the 11th century. In the 12th century a planned town was laid out between them. Numerous historic buildings from various periods survive here.	The Applicant notes this comment.
HE2	Historic England provided advice on the Preliminary Environmental Information Report (PIER) in a letter dated 9 July 2025. In this we agreed with the extent of the study area and with the 15 designated heritage assets identified for assessment within the chapter on Cultural Heritage and Archaeology. Following our advice on the PIER, we welcome amendments to the scheme to reduce the impact of the scheme on Castle Acre. These comprise: • the relocation of the substations and BESS from the northern edge of development, fields 33 and 35, to the south of Bartholemew's Hill Plantation and • the setting back of solar arrays from northern half of field 33.	The Applicant welcomes this comment.
HE3	Despite this mitigation, there are still some views of the scheme from the Castle and Priory. The applicant has not engaged us in any further pre application advice. We would welcome the chance to explore if any additional mitigation can be achieved. There are also elements of the assessment that we consider would merit further work.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] and ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] detail the visibility of the Scheme from the Castle and Priory. The visibility of the Scheme from the Castle and Priory is limited as the northern part of the Site is generally visually well contained. Views from these heritage assets are largely confined to the new pylons that will be required and glimpsed views of a small number of fields within the Order limits. The Applicant welcomes further consultation to clarify Historic England's concerns and what elements of the assessment they identify may need further work.
HE4	2) Impacts on designated and non-designated heritage assets Our primary consideration in relation to the scheme is the impact of the proposal on the significance of highly designated heritage assets comprising scheduled monuments, grade I and grade II* listed buildings, and conservation areas. As is set out above, the focus of our comments will be on the highly designated heritage assets at Castle Acre.	The Applicant notes this comment and has responded to the points set out by Historic England below.
HE5	The assessment of the contribution setting makes to significance in relation to the Castle and Priory is somewhat underplayed in the Environmental Statement. The significance of the conservation area is also undervalued.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] and ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] detail the contribution of setting to the significance of both the Castle and Priory. The Applicant disagrees with the suggestion that this significance has been underplayed. The assessment of contribution to setting is the same as that presented at PEIR (apart from a small clarification in regard to the Castle and topography) and, in response to PEIR, Historic England stated that they were in 'broad agreement' with the assessments.



Reference number	Representation	Applicant response
		With regards to the assessment of significance of Castle Acre conservation area, the criteria for assigning Sensitivity/Value (which roughly equates to levels of significance, but using EIA terminology) is clearly defined within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] . The criteria used for determining Sensitivity/Value, and the value ascribed to Castle Acre Conservation Area is the same as that presented at PEIR, with which Historic England stated that they were in agreement.
HE6	The impact of the development upon the significance of these assets requires some further consideration. The assessment follows the general approach to undertaking an Environmental Impact Assessment. However, there is no explicit assessment of the level of harm in relation to the assets. This is required to inform mitigation measures and to enable the weighing of the harm against the public benefits of the proposal, Overarching National Policy Statement for Energy, EN1 5.9.33.	The levels of impact described in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are considered to be explicit. Section 8.5 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] details the criteria for assessing impact in explicit terms. This methodology was detailed in both the scoping report and PEIR, which Historic England agreed with.
HE7	The impact of the overhead line providing a connection to the National Grid Substation will also be discussed. There are two scenarios presented for this, Scenario A, (installation of a new line and retention of existing) and Scenario B (installation of a new line and removal of existing). The former would result in a higher level of harm to the historic environment. Our preference for Scenario B will be discussed in our written representations.	The Applicant acknowledges Historic England's preference for Scenario B.
HE8	We will also consider the impact of the proposals on the Deserted Medieval Village at Great Palgrave which is a scheduled site monument; St Georges' Church, South Acre and the grade II registered landscape at Narford Hall which forms part of the setting of the grade I Hall.	The Applicant notes this comment.
HE9	In relation to the direct impacts, several parts of the scheme would require excavation and could impact below ground archaeology. The substations and BESS require piled foundations. Further information is required about the foundations for the pylons. The mitigation planting could also have an impact on buried remains.	The various below ground impacts of the Scheme have been discussed with Norfolk County Council Historic Environment Service (NHES) and have been used to inform ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161] . The works undertaken to date have not identified any archaeological remains that would be any more sensitive to deep impacts than relatively shallow impacts with the depth at which archaeology is encountered typically being between 0.2m to 0.8m below ground level, as detailed in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] . In consultation with NHES, the Archaeological Mitigation Strategy has been designed to have flexibility to allow for appropriate archaeological mitigation once full details of the Scheme impacts are known, including provision for areas of deep impact. Therefore, it is not considered necessary to provide detailed pylon information at this stage, which would be determined at the detailed design stage for the Scheme, should development consent be granted.
HE10	An Outline Archaeological Mitigation Strategy (Section 8.9.1) is provided. The approaches to mitigation in the strategy are as we would expect. However, the precise layout of parts of the scheme are not yet available, so the details of the areas of the mitigation cannot yet be determined. This information needs to be provided to ensure appropriate mitigation is being applied to each area. Primarily we want to be reassured by the applicant that the mitigation is appropriate and proportionate to the significant of the heritage assets.	The various below ground impacts of the Scheme have been discussed with NHES and have been used to inform ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161] . In consultation with NHES, the Archaeological Mitigation Strategy has been designed to have flexibility to allow for appropriate archaeological mitigation once full details of the Scheme impacts are known. This will ensure preservation in proportion to the significance of archaeological remains present.
HE11	We are also aware the development will result in a range of potentially significant impacts on non-designated heritage assets and archaeological sites. We will not be commenting on this matter in detail and will defer to the LPA and their expert and specialist advisors	The Applicant notes this comment.



Reference number	Representation	Applicant response
HE12	3) Development Consent Order We note a Draft Development Consent Order has been provided. In the event of the project being consented, we would want to ensure that there is adequate mitigation and enhancement, and that this is appropriately secured through the consent order. We will therefore be providing comments and recommendations on the DCO wording.	The Applicant notes this comment.
HE13	4) Specialist Science Advice We will provide specialist science advice in relation to the proposed ground works. Issues such as chemical pollution, changes to ground water flow and compaction of soils have been discussed within Chapter 12 Water Resources. It should be noted that changes to groundwater levels or compaction of archaeological deposits may result in physical damage or changes to the preservation of an archaeological site. These will also be discussed. We will provide comment on the Desk Based Assessment and Geophysical Survey Report and Outline Archaeological Mitigation Strategy. Whilst the latter is generally appropriate, the provision for preservation in situ requires further consideration, paragraphs 3.10 and 3.11.	The Applicant notes this comment and would welcome further discussion on these points as part of the Statement of Common Ground with Historic England [APP/5.14].
HE14	Summary As set out above we will be looking to make further comments on the above in our Written Representation and to ensure that the DCO is appropriately worded to provide necessary mitigation for the historic environment. We would also welcome the opportunity to resolve a number of matters through a Statement of Common Ground with the applicant if this would be considered appropriate and useful by the Examining Authority.	The Applicant and Historic England have prepared a Statement of Common Ground with Historic England [APP/5.14] which has been submitted in draft at Deadline 1.



3.9 RR-021 and AS-062, Environment Agency

Reference number	Representation	Applicant response
EA1	Key Issues: • Low resolution of hydrogeological model which contradicts other lines of evidence, with implications that interactions with groundwater may not be fully understood • Risks to groundwater from pollution have not been considered fully • Risks to surface water from pollution have not been considered fully • Insufficient management proposed for invasive species • Decommissioning – measures required to ensure appropriate removal of infrastructure and waste are insufficient • Drainage proposals require further consideration • Requirement wording needs addressing • We request to be a named consultee for the discharge of Requirements 13 and 14	The Applicant notes the Environment Agency's list of issues and has responded to each of these in turn in the rows below.
EA2	Drawings / Plans / Sections ID: EA01 (Source Protection Zone) Figure 12.5: Source Protection Zone [APP-119] Issue: Figure 12.5 is not easily interpreted due to shading not being used to define Source Protection Zone (SPZ) extents. Impact: Unclear to the reader how the draft Order limits, Battery Energy Storage System (BESS) sites, substation sites and SPZs intersect. Solution: Update Figure 12.5 to use shading to clearly define SPZ extents. Additional Comments:	ES Figure 12.5: Source Protection Zone [APP-119] was intended to show what infrastructure is located within SPZ 1 and 2; however, to aid the Environment Agency's interpretation, this Figure will be updated at a future Deadline.
EA3	ID: EA02 (Drinking Water Protected Area) Figure 12.12 Drinking Water Protected Area [APP-126] Issue: Figure 12.12 shows the extents of a designated Drinking Water Protected Area in the context of the site, but there are no figures showing other drinking water protection designations. Impact: The reader is unable to see how the Drinking Water Surface Water Safeguard Zone lies across the entire draft Order limits area, and how a Drinking Water Groundwater Safeguard Zone lies across the south-western part of the site. Solution: Provide figures showing other drinking water protection designations in the context of the draft Order limits. Additional Comments:	It is noted that ES Figure 12.12: Drinking Water Protected Area [APP-126] does not show other drinking water protection designations and this Figure will be updated at a future Deadline.
EA4	ID: EA03 (3D Representation of Groundwater) Figure 12.7 3D Representation of Groundwater [APP-121] Figure 12.8 Minimum Static Groundwater Level Depths within CSA [APP-122] Figure 12.9 Maximum Static Groundwater Level Depths within CSA [APP-123]	To aid the Environment Agency's interpretation of ES Figure 12.7: 3D Representation of Groundwater [APP-121], the following changes will be made at a future Deadline. • Addition of orientation labels or description • Elevation shading to show mAOD values for the maximum groundwater elevation surface and foundation extent surface; and



Reference number	Representation	Applicant response
	Issue: Figure 12.7 is poorly executed. Impact: Figure 12.7 is difficult to interpret which limits its value. It is difficult to distinguish the site topography, relative elevation of groundwater, extents of the hydrogeological model, viewpoint orientation and relation to the study site. Groundwater elevation appears to be a single plane uninfluenced by surface elevation in the context of the model. Solution: Revise Figure 12.7 to provide additional views of the modelled area, with clearer indication of view orientation and contouring of the groundwater surface, if applicable. Additional Comments:	Figures and text refer to groundwater elevation (mAOD) rather than groundwater level to increase clarity between absolute elevation and depth below ground.
EA5	ID: EA04 (Groundwater Flow Direction) Figure 12.7 3D Representation of Groundwater [APP-121] Figure 12.8 Minimum Static Groundwater Level Depths within CSA [APP-122] Figure 12.9 Maximum Static Groundwater Level Depths within CSA [APP-123] Figure 12.10 Groundwater Flow Patterns [APP-124] Figure 12.11 Private Water Supplies Locations [APP-125] Figure 12.12 Drinking Water Protected Area [APP-126] Figure 12.13 Work No.2 Piling Locations within CSA for Maximum Groundwater Level [APP-127] Figure 12.14 Work. No 3 Piling Locations within CSA for Maximum Groundwater Level [APP-128] Figure 12.15 Work No. 4 Piling Locations within CSA for Maximum Groundwater Level [APP-129] Figure 12.16 Maximum Foundation Extents for Minimum Groundwater Level [APP-130] Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.6.9, 12.6.37 and 12.6.38 Issue: Estimated groundwater flow direction across most of the draft Order limits area is indicated to be toward the north-east, north or northwest, approximately following local topography. Impact: Groundwater flow direction as indicated in Figures 12.7 to 12.16 may be inaccurate. Solution: Claims such as that made in Sections 12.6.37 and 12.6.38 regarding potential groundwater interception should be revised and new evidence, preferably across multiple lines, sought to support them. Intrusive investigation to measures groundwater level with empirical evidence is highly recommended. Additional Comments: The majority of the draft Order limits area is shown to be underlain directly by Chalk Principal aquifer, and according to Chapter 12 Section 12.6.9, trial trenching activities in the vicinity of the proposed BESS and substation sites did not encounter superficial deposits. The draft Order limits area lies within Zone 1 and Zone 2 of a groundwater SPZ for a potable water abstraction at Marham, located to the west of the draft Order limits area. This indicates that	The Environment Agency's comment on groundwater flow is noted. The Environment Agency's NEAC model outputs and BGS 1976 hydrogeological map indicate a regional westward flow component towards the Marham abstraction. The north-northeast flow vectors shown in Figures 12.7 to 12.16 to ES Chapter 12: Water Resources [APP-061] are therefore more likely to represent localised topographic influences near the River Nar valley margin than the regional groundwater flow regime within the Chalk Principal Aquifer. The groundwater surfaces present in ES Figures 12.7 to 12.16 to ES Chapter 12: Water Resources [APP-061] are intended to illustrate relative groundwater depth beneath proposed infrastructure locations and identify where piling or foundations may interact with perched or shallow groundwater. This would highlight zones where interception risk across the Work Nos. 1 to 4 during construction could occur. They were not intended to be used as a regional groundwater flow model. Paragraphs 12.6.37 and 12.6.38 of ES Chapter 12: Water Resources [APP-061] will be updated at a future Deadline to remove any implied statements of groundwater flow direction across the Order limits and present the Applicant's findings are local-scale interpretations. Reference to the Environment Agency's NEAC model and BGS hydrogeological mapping in regard to regional groundwater flow will be made to consolidate the conceptual groundwater model of the Scheme. Paragraph 12.8.23 of ES Chapter 12: Water Resources [APP-061] commits to installing boreholes within the Order limits to monitor groundwater levels prior to construction to ensure that construction activities such as HDD and foundations do not occur when groundwater levels are high enough to interact with the activity. The Applicant has requested the Environment Agency's NEAC model and this will be used to further refine groundwater elevations within the Order limits at a subsequent Deadline, noting that <i>"the Applicant's estimations are within a similar range of values for most of the Study Area"</i>. As such, the Applicant does not anticipate the outcome of ES Chapter 12: Water Resources [APP-061] to change.



Reference number	Representation	Applicant response
	groundwater within the Principal aquifer in this area is anticipated to migrate toward the abstraction point to some degree. A review of the 1976 British Geological Society (BGS) Hydrogeological Map of Northern East Anglia (British Geological Survey (BGS) large image viewer IIPMooViewer 2.0) indicates that the potentiometric groundwater upper surface within the Chalk principal aquifer in the vicinity of the site is locally northward toward the River Nar valley but more generally toward the west in the direction of the Marham public water supply abstraction. This is shown in the BGS map as ranging from approximately 30m Above Ordnance Datum (AOD) in the east to approximately 15m AOD in the west. The model outputs produced by the Applicant can be compared to the outputs for various hydrological scenarios available from the Environment Agency's North East Anglian Chalk (NEAC) model, a bespoke groundwater model using MODFLOW 5 which covers most of East Anglia. The outputs for a wet month Scenario (March 2001 – corresponding to the Applicant's 'worst-case' data usage of highest recorded levels) show very different groundwater contours and resultant flow directions compared with those produced by the Applicant. Flow in the Chalk is east-to-west in the NEAC model data, rather than south-to-north using the Applicant's techniques derived from individual boreholes nearby. Northwards flow is present locally near the left bank of the Nar, but this reflects the topography close to the Nar intercepting the westerly flowing groundwater. If modelling will be used in the future, the Applicant is advised to consider groundwater flow on a more regional level rather than overfitting a model to a low number of interpolated datapoints. They may also choose to request model runs done on the Environment Agency's NEAC model which can run scenarios designed and paid for by the Applicant. Although the Applicant's estimations are within a similar range of values for most of the Study Area, the figures provided from their modelling should not be accepted as an accurate representation of subsurface groundwater elevation or flow direction.	
EA6	ID: EA05 (Maximum Foundation Extents) Figure 12.13 Work No.2 Piling Locations within CSA for Maximum Groundwater Level [APP-127] Figure 12.14 Work. No 3 Piling Locations within CSA for Maximum Groundwater Level [APP-128] Figure 12.15 Work No. 4 Piling Locations within CSA for Maximum Groundwater Level [APP-129] Figure 12.16 Maximum Foundation Extents for Minimum Groundwater Level [APP-130] Issue: Figures 12.13 to 12.16 do not clearly show the orientation of each 3D model view, and the elevation of the maximum extent of foundations is not given. Impact: Difficulty in interpreting figures. Solution: Revise figures to more clearly define the area represented in the drawings, including view orientation, and the maximum foundations extent should	Figures 12.13 to 12.16 of ES Chapter 12: Water Resources [APP-061] were used to illustrate the maximum groundwater elevation surface across the core study area and identify where proposed foundation depths could theoretically intercept shallow groundwater under worst-case conditions. The figures also demonstrate at a concept level where piling may be required depending on foundation design. The following changes will be made at a future Deadline to aid the Environment Agency's interpretation: • Addition of orientation labels or description • Elevation shading to show mAOD values for the maximum groundwater elevation surface and foundation extent surface • Highlight areas where foundations intersect or exceed groundwater elevation surfaces; and • Figures and text refer to groundwater elevation (mAOD) rather than groundwater level to increase clarity between absolute elevation and depth below ground. The Applicant agrees that the conceptual model present is not the final tool for foundation design, but rather to provide a screening-level assessment of groundwater conditions and to identify areas needing piled or shallow foundations and will be aligned with Environment Agency regional groundwater understanding (NEAC model). The Design Principles, Parameters and Commitments [APP/5.8.1] will be updated at a future deadline to commit to foundations not directly interacting with groundwater.



Reference number	Representation	Applicant response
	be shaded to show elevation values. The model should be updated to inform detailed foundation design, based on site specific survey and monitoring data. Additional Comments: Use of inconsistent terminology may also result in confusion. Figures 12.13 to 12.15 are titled to show the anticipated extent of piling in comparison with the maximum groundwater level. In the context of the data presented, the maximum groundwater level in mAOD represents the shallowest extent and therefore worst-case condition for groundwater. For clarity the report should preferably refer to groundwater 'elevation' (in mAOD) as is represented within the figures rather than 'level', which could be misinterpreted as relative to ground level rather than Ordnance Datum. Figure 12.16 shows the minimum (i.e. deepest) groundwater elevation (i.e. best case) in relation to anticipated piling depth. Although this is useful information, this could potentially be misinterpreted by the reader as presenting a combined overview of the information provided in Figures 12.13 to 12.15.	
EA7	ID: EA06 (Avoidance of Pipelines) Figure 16.1 Utilities Plan [APP-131] Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.6.19 and 12.8.31 Issue: Figure 16.1 does not show the approximate routes of the former Ministry of Defence (MoD) oil pipeline or Exolum pipeline which traverse the draft Order limits. Impact: If damaged by construction works, both pipelines could cause groundwater contamination. There may be historic soil and/or groundwater contamination associated with these features, which could be encountered by ground works. Solution: The Applicant should, if able, identify the approximate routes of the pipelines, and confirm the measures which will be taken at detailed design stage to locate and avoid these. Additional Comments: Sections 12.6.19 and 12.8.31 refer to the presence of a redundant MoD fuel pipeline traversing Work Nos. 1 to 4, and a separate Exolum pipeline traversing Work No. 1. Both are stated to be avoided during detailed design phase, i.e. not placing infrastructure within a working area of the pipelines and therefore reducing the risk of introducing contaminants to the underlying aquifer via construction activities. The MoD pipeline is described as reportedly buried at shallow depth (1.0 to 1.5 mbgl). Either pipeline could be damaged if encountered during intrusive investigations or construction works.	A figure showing the underground pipelines will be produced at Deadline 1. Paragraph 12.7.7 of ES Chapter 12: Water Resources [APP-061] states that pipelines will be located using techniques such as CAT scanning or hand digging, therefore limiting the potential to introduce contaminants to groundwater.
EA8	Environmental Statement ID: EA07 (Environmental Legislation) Appendix 7.1: Consultation and Legislation, Planning Policy and Guidance [APP-147], Section 7.2 Issue: Omission of Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.	The Applicant notes this comment and confirms that ES Appendix 7.1: Consultation and Legislation, Planning Policy and Guidance [APP/6.4.1] has been updated at Deadline 1 to include the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.



Reference number	Representation	Applicant response
	Impact: Risk of not considering all relevant environmental legislation and new environmental definitions in legislation in respect of Biodiversity Net Gain (BNG), such as 'irreplaceable habitat', along with related offences to said habitats. Solution: Please include the following legislation, policy and guidance: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 in Section 7.2, for completeness. Additional Comments:	
EA9	ID: EA08 (Watercourse Buffers) Environmental Statement Chapter 5: The Scheme [APP-054], Section 5.5.22 and Table 5-2 Environmental Statement, Chapter 7: Ecology and Biodiversity [APP-056], Table 7-10 Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.7.7 and 12.8.10 Outline Construction Environmental Management Plan [APP-186], Table 7 Issue: Insufficient buffer around watercourses. Impact: Increased opportunity for pollutant and fine sediment runoff to enter watercourses, disruption to the integrity of the natural river corridor, loss of riparian habitat and subsequently lateral connectivity, disturbance to fish species; restriction of the free movement of riparian mammals. Solution: The Applicant should commit to avoiding the riparian zone, which is defined as 10m from bank top under guidance for BNG. It should be clearly demonstrated that there is a sufficient buffer between the development, any fences and any watercourse or ditch. This will allow for the natural river corridor to be maintained and free movement of riparian mammals up and down the system. This is supported by paragraph 2.10.78 of National Policy Statement for Renewable Energy Infrastructure (EN-3). Additional Comments: There are inconsistencies in watercourse buffer distances between documents. Table 7-10 of Chapter 7 highlights a 6m buffer zone around ditches, while Table 7 within the outline Construction Environmental Management Plan (CEMP) states that a minimum of 10m will be maintained. It is acknowledged that Sections 5.5.22, 12.7.7 and 12.8.10 state that infrastructure would be placed at least 10m away from watercourses, however this should be updated in Table 5-2. During the construction phase, temporary construction compounds within 15 metres of watercourses could be screened with fencing on sides adjacent to the watercourse, and working lighting could be positioned to avoid light-spill onto sections of the watercourse. Both measures would lower the risk of disturbance to riparian mammals occupying the watercourse.	The Applicant takes note of this inconsistency. Table 7-10 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] has been updated at Deadline 1 to state 10m buffer zones around ditches. The 10 m buffer zones for all above ground development will apply from watercourse or ditch bank tops and this will be stated within ES Chapter 7: Ecology and Biodiversity [APP/6.2.2]. Table 5-2 of ES Chapter 5: The Scheme [APP/6.1.2] will be updated at Deadline 1 to commit to a 10 m buffer of watercourses. It is not anticipated that construction compounds will be located within 15m of a watercourse. The oCEMP [APP/7.6.1] has been updated to commit temporary construction compounds within 15m of watercourses could be screened with fencing on sides adjacent to the watercourse, and working lighting could be positioned to avoid light-spill onto sections of the watercourse.
EA10	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000155-6.2 ES Chapter 7 Ecology and	As clearly set out within ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] (see paragraphs 7.8.54, 7.8.55, 7.8.99, 7.8.100, 7.8.157, 7.8.158), the Site does not contain any suitable watercourses or connected waterbodies that could support Otter or Water Vole and accordingly, it has been concluded that these species



Reference number	Representation	Applicant response
	Biodiversity.pdf Outline Construction Environmental Management Plan [APP-186], Table 2 Issue: Inconsistencies in monitoring requirements for otter and water vole. Impact: Inconsistencies leading to confusion around monitoring requirements. Solution: Update Table 7-12 of Chapter 7 to reflect the monitoring requirements described in the outline CEMP for all relevant protected species. Additional Comments: Table 7-12 of Chapter 7 indicates that there are no monitoring requirements for any protected species including otter and water vole. However, Table 2 of the outline CEMP states that monitoring requirements including pre-construction site walkovers and further surveys for protected species including otter and water vole may be carried out if required.	are absent from the Site and adjacent areas and will not be adversely affected. Accordingly, no populations are present that could be subject to monitoring and therefore Table 7-12 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] remains accurate and appropriate in this regard. Measures set out within the oCEMP [APP/7.6.1] in relation to Otter and Water Vole (Table 2) refer to further update surveys that may be required in order to reflect the passage of time and confirm that any such position has not changed prior to commencement of construction activities (in regard to these species representing a precautionary measure outside of any ES requirement, likely to confirm that suitable habitat remains absent) rather than any specific monitoring requirement. Accordingly, Table 7-12 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] and the oCEMP [APP/7.6.1] are entirely consistent and it is not proposed to update Table 7-12 at this stage.
EA11	ID: EA10 (Invasive Non-Native Species) Environmental Statement, Chapter 7: Ecology and Biodiversity [APP-056], Sections 7.7.13 and 7.8.46; Table 7-12 Outline Construction Environmental Management Plan [APP-186] Outline Landscape and Ecological Management Plan [APP-191] Issue: Inconsistencies and lack of detail regarding the management of invasive non-native species (INNS) found on site, including Variegated Yellow Archangel and Three-cornered Garlic. Impact: Lack of information within the outline CEMP and Landscape and Ecological Management Plan (LEMP) could result in the uncontrolled spread of INNS listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). There is also an increased risk of legal non-compliance. The accidental spread of INNS is an offence under the Wildlife and Countryside Act 1981. Solution: Produce an Invasive Species Management Plan to support both the outline CEMP and outline LEMP. This should include details of measures to prevent the spread of INNS such as biosecurity measures. We would strongly advise that both INNS are eradicated from the site to prevent their spread. Although the locations of both species are currently limited to buffer areas, there is potential for them to grow and spread over time or through indirect disturbance through accidental encroachment into buffer areas (see Section 7.8.46 of Chapter 7). Additional Comments: Sections 7.7.13 and 7.8.46 of Chapter 7 state that invasive species management to prevent the spread of INNS will be delivered through embedded and additional mitigation which will be detailed in the outline CEMP and outline LEMP. However, Table 7-12 of Chapter 7 indicates that there is no additional mitigation, and details of embedded and/or additional mitigation are not included within the outline CEMP or outline LEMP.	The Applicant notes this comment and in response, the oLEMP [APP/7.11.1] and oCEMP [APP/7.6.1] have been updated at Deadline 1 to include specific reference to secure a detailed Invasive Species Management Plan (to include specific reference to Variegated Yellow Archangel and Three Cornered Garlic) within the detailed Landscape and Ecological Management Plan, as secured through Requirement 7 in Schedule 2 to the draft DCO [APP/3.1.1]. Paragraph 7.7.13 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] is referring to 'additional measures' to those mentioned in the previous paragraphs, but still measure that are included within the embedded mitigation for the Scheme, and as such, Table 7-12 is correct.
EA12	ID: EA11 (Waste Classification) Environmental Statement Chapter 16: Other Environmental Matters [APP-065] Outline Decommissioning Strategy [APP-190]	The Applicant has provided outline measures for the provision of a detailed Site Waste Management Plan for construction of the Scheme, and subsequent Waste Management Strategies for the operation and decommissioning phases of the Scheme. These are secured respectively through the oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1], by Requirements 13, 14, and 20 respectively in Schedule 2 to the draft DCO [APP/3.1.1]. These requirements would require the relevant detailed Site Waste Management Plan or Waste Management Strategy to be provided in full detail to Norfolk County Council as the relevant



Reference number	Representation	Applicant response
	Issue: Lack of detail regarding outline measures for Duty of Care to ensure waste is described and classified correctly by the waste producer or holder, throughout all phases. Impact: Waste arising from the Proposed Development may be improperly classified which could lead to inappropriate process controls, recovery treatment or disposal locations. Without a waste assessment of each waste component, the risk of harm to the environment is increased, as waste may end up somewhere without the appropriate controls. Proper disposal or recycling is critical to avoid environmental contamination. Solution: Update Chapter 16 and the outline decommissioning strategy with further details that require waste to be described and classified in accordance with relevant technical guidance at the time. Furthermore, these documents should be updated so that reference is made that responsibility will be taken to ensure all waste is appropriately classified in accordance with WM3, or other technical assessment that achieves the same standard, before a suitable route for recovery or disposal can be identified. See Waste Classification Technical Guidance on WM3. Additional Comments: Waste quantities may be conservative if based on the maximum 40- year indicative design life rather, than a worst case scenario.	waste planning authority, with consultation from the Environment Agency, to approve the details therein. These documents would set out in full the duty of care to ensure waste is described and classified correctly by the waste producer or holder, as is provisioned in outline. For clarity, the oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1] have been updated for Deadline 1 to make specific reference to WM3, to ensure all waste is appropriately classified before a suitable route for recovery or disposal can be identified.
EA13	ID: EA12 (Flood Risk – BESS) Environmental Statement Appendix 12.2: Flood Risk Assessment [APP-170], Section 12.2.20 Issue: Insufficient flood mitigation provided for BESS units. Impact: As currently proposed, BESS units may remain at risk of flooding where pluvial flood depths exceed 0.1m. Solution: Confirm BESS units will be appropriately raised above ground level. We require raising to a minimum of 300mm above localised flood depths. Additional Comments: Section 12.2.20 states that the BESS units will be located to avoid areas where pluvial flood depths exceed 0.4m, with units raised 0.1m above ground level. This raising is insufficient as mitigation for pluvial flooding.	The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as detailed within Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [APP-170]. If localised flood depths cannot be managed via the drainage strategy, ES Appendix 12.2: Flood Risk Assessment [APP-170] will be updated at a future deadline to confirm that BESS units will be appropriately raised to 300 mm above the modelled flood level. It should be noted that the 2D pluvial modelling represents flow pathways and flood depths using baseline topography. Groundworks / enabling works for Work Nos. 2 to 4 are likely to level the area to remove topographical hollows, meaning the baseline flooding scenario is unlikely to be representative of the post-development scenario. As the Scheme does not have a detailed design at this stage, there is a commitment in ES Appendix 12.2: Flood Risk Assessment [AS-053] to have a formal drainage system for the BESS and Customer Substation designed to the 1% AEP + 40% climate change allowance, with no flooding of the drainage system built into the design, as per National Standards. As such, the current pluvial ponding would enter the drainage system, rather than flow across or pond on the surface of Work Nos. 2 to 4. The Environment Agency have agreed that this principle is acceptable in their Statement of Common Ground on the Great North Road Solar and Biodiversity Park, where the BESS area was modelled to have pluvial depths greater than for the Scheme (see EA025 of the EA's SoCG for Great North Road).
EA14	ID: EA13 (Sensitivity Criteria for Receptors) Environmental Statement Chapter 12: Water Resources [APP-061], Tables 12.2 and 12.3 Issue: Water Framework Directive (WFD) status has been used to characterise receptor sensitivity. This is inappropriate, and as a result of this Table 12.2 assigns 'medium' sensitivity to Groundwater Dependent Terrestrial Ecosystems (GWDTEs), Sites of Special Scientific Interest (SSSI) and private groundwater abstractions for potable use.	The determination of sensitivity criteria for these receptors is well-precedented and has been developed in consultation with regulatory bodies. It should be noted that the sensitivity criteria outlined in ES Chapter 12: Water Resources [APP-061] is analogous with those used for the Mallard Pass, Cleve Hill, Byers Gill and Great North Road solar DCOs. As the River Nar and its tributaries are defined as Priority Habitat Chalk Rivers, this waterbody should be identified as a high sensitivity receptor. The reclassification of this receptor will be undertaken at a future Deadline.



Reference number	Representation	Applicant response
	Impact: The sensitivity of the above receptors has been underestimated. Solution: Reassess the sensitivity of these receptors. This may result in changes to the determined impact significance to these receptors detailed in Table 12.3. See 'additional comments' for further information. Additional Comments: Private groundwater abstractions for potable use or food production are afforded a default 50m radius SPZ1, which is a classification stated in the same table to be High sensitivity. More information on SPZs is provided here: Groundwater source protection zones (SPZs) - GOV.UK. We consider the assignment of 'medium' sensitivity to abstractions for potable use or food production purposes to be inappropriate. However, we acknowledge that for the site in question groundwater resources are already assessed as High sensitivity due to the presence of local SPZ1 and that this has no material impact on the outcome of the assessment. In the absence of 'very high' and 'high' categories to differentiate between we consider that SSSI and GWDTE receptors, where present, should be assigned High sensitivity. It is explicit in the characterisation that the use of 'poor' waterbody status to designate waterbodies as low sensitivity is incorrect. We consider WFD waterbodies of 'poor' status to be of high priority to prevent further deterioration, and do not consider them to be 'low sensitivity' receptors. The Applicant should consider the use of aquifer typology (Principal, Secondary etc.) as a method of designating relative sensitivity to groundwater bodies.	In accordance with Table 12.3 of ES Chapter 12: Water Resources [APP-061], no change to the output of determined impact significance on watercourses will occur. Sensitivity for SSSI designations will be reassessed at a future Deadline. As noted by the EA, the resource being utilised by abstractions has been assigned high sensitivity and therefore private water supplies utilising groundwater, by default, have been assessed accordingly.
EA15	ID: EA14 (Private Water Supplies) Environmental Statement Chapter 12: Water Resources [APP-061], Table 12.10 Issue: Insufficient investigation into how Private Water Supplies (PWS) might be impacted by the Proposed Development. Impact: Risk of negatively impacting PWS if risks are not sufficiently identified, assessed and mitigated. Solution: Carry out further investigation into PWS at risk from the Proposed Development. This could be done using a Water Features Survey, or similar. Additional Comments: Dipping water levels and plumbing depths of wells or boreholes will allow proper assessment of the vulnerability of these boreholes to changed in the hydrological and hydrogeological regime.	As outlined in paragraph 12.6.48 of ES Chapter 12: Water Resources [APP-061], private water supplies in proximity to the Scheme abstract groundwater, as indicated by council records, and as such the levels derived from the triangulated groundwater elevation model is suitable to determine groundwater abstraction depths. As outlined in paragraph 12.8.107 of ES Chapter 12: Water Resources [APP-061], effects on the groundwater resource from the Scheme of which private water supplies draw, as a result of embedded mitigation outlined in the oCEMP [APP/7.6.1], is negligible. As such, it is not necessary to undertake dipping of PWS.
EA16	ID: EA15 (Chalk Rivers) Environmental Statement Chapter 12: Water Resources [APP-061], Table 12.3 Issue: Table 12.3 assigns the receiving surface waterbody (River Nar) a 'medium' sensitivity, failing to recognise that the River Nar and several of its tributary watercourses are defined as Priority Habitat Chalk Rivers. Impact: The sensitivity of the receiving surface waterbody has been underestimated. Solution: Update Table 12.3 to assign the receiving surface waterbody 'high' sensitivity.	The Applicant refers to its response above to EA14 on this matter.



Reference number	Representation	Applicant response
	Additional Comments: Table 12.3 justifies the assigned 'medium' sensitivity on the following basis: "the receiving waterbody (River Nar) in which the Scheme is located has a WFD Overall Water Body Class of "Moderate", Ecological classification of "Moderate" and a Chemical classification of "Good" (excluding uPBTs)". However, Table 12.3 does not note that the River Nar and several of its tributary watercourses are defined as Priority Habitat Chalk Rivers (Chalk Rivers (England) Natural England Open Data Geoportal). This was previously raised in our response at PEIR stage (Our ref: XA/2025/100395/01-L01) and is acknowledged in Section 12.6.88. Chalk streams are one of the rarest freshwater bodies on Earth, and approximately 85% of them are found in England (https://engageenvironmentagency.uk/engagementhq.com/chalk-streams). In accordance with the Catchment Based Approach the Environment Agency is committed to protecting and promoting the restoration of these waterbodies (CaBA CSRG IMP PLAN FINAL 25.11.22. V2).	
EA17	ID: EA16 (Abstraction Licence) Environmental Statement Chapter 12: Water Resources [APP-061], Section 12.6.54 Issue: Section 12.6.54 states that one identified licensed abstraction (6/33/58/*G/0248) is listed as having domestic use, but that the property is not currently in a habitable state and is unlikely to be utilising abstracted water for potable consumption. Although the property is shown to be in poor condition, this does not preclude the possibility that the abstraction may still be in use. Impact: It should not be ruled out that during the lifetime of the Proposed Development there is the potential for the abstraction to be active or else brought back into use. Failing to consider the worst-case conditions could result in an incorrect assessment of impacts to all receptors. Solution: Consider the continued use of the abstraction license as representative of reasonable worst-case conditions and assess impacts to this receptor accordingly. Additional Comments: The location of abstraction license 6/33/58/*G/0248 is immediately outside the draft Order limits as shown in Figure 3.2 and presumably outside the control of the Applicant. As such the potential for this property to be redeveloped and for the abstraction to be resumed for its licensed use cannot be discounted, and it should be noted that the licensed use is 'General Farming and Domestic' use, which would not require the property to be inhabited to be used. Abstraction 6/33/58/*G/0248 is noted to be on derelict property. However, the abstraction remains a protected right and the supply should not be derogated. The apparent lack of domestic use by the abstraction does not limit its need to be protected from disturbance or changes to groundwater. Please refer to policy statement N11 (Groundwater protection position statements - GOV.UK). Any proposal which will impact a protected right, including, but not limited to private water supply for domestic use and licensed abstractions, we would seek equivalent protection of the environment as if the effect of the development was caused by a licensable abstraction. Please refer to Section 39 and 39A and 39B of the Water	Paragraph 12.8.123 of ES Chapter 12: Water Resources [APP-061] states that <i>"Whilst the property is derelict and uninhabited, the licence is still extant and therefore requires assessment. Triangulation/interpolation of hydrometric monitoring data available on Hydrology Data Explorer, which shows a maximal groundwater level of 25.2m BGL"</i>. As such, the Applicant considers that abstraction licence 6/33/58/*G/0248 has been assessed appropriately.



Reference number	Representation	Applicant response
	Resources Act 1991. The default 50m SPZ1 is applied not just to domestic water supplies but all water supplies used in food production.	
EA18	ID: EA17 (WFD Groundwater Bodies) Environmental Statement Appendix 12.3: Water Framework Directive Assessment [APP-171] Environmental Statement Chapter 12: Water Resources [APP-061], Section 12.5.5 Issue: Table 12.6 fails to consider all WFD Groundwater bodies within the Hydrology Study Area as defined in Figure 12.3 Impact: Risk of impacting WFD Groundwater bodies if they are not considered within the assessment. Solution: Include all WFD Groundwater bodies within the Hydrology Study Area in the assessment. This includes the Cam and Ely Ouse Chalk WFD Groundwater Body (water body ID GB40501G400500) which is located within 2km south-east of the draft Order limits. Additional Comments: The Wider Study Area for hydrology and hydrogeology is defined as 5km from the order limits in Section 12.5.5 of Chapter 12. We do not expect the inclusion of the Cam and Ely Ouse Chalk WFD Groundwater Body in the assessment to result in any changes to the outcome, but do expect all WFD bodies within the Study Area to be considered. Table 12.6 in Chapter 12 also has an error in the header of the right-hand column. It refers to a surface water WFD body, not the WFD Groundwater body underlying the site.	It is noted that the Cam and Ely Ouse Chalk WFD Groundwater Body has not been included within the wider study area assessment. For completeness, Table 12.6 of ES Chapter 12: Water Resources [APP-061] will be updated to ensure reference to the WFD Groundwater body underlying the Site at a future Deadline. ES Chapter 12: Water Resources [APP-061] and ES Figure 12.3: Hydrology Study Area [APP-117] will be updated to include both Groundwater bodies underlying the Site. However, as noted by the Environment Agency, the outcome of the assessment will not change.
EA19	ID: EA18 (Groundwater Levels) Environmental Statement Chapter 12: Water Resources [APP-061], Tables 12.7 and 12.8 Issue: No context of depth relative to ground level has been provided in Tables 12.7 and 12.8. Impact: Lack of clarity regarding where groundwater levels have been recorded as artesian or sub-artesian, and it is not readily apparent how the recorded borehole groundwater level and interpolated groundwater levels reported in Table 12.8 relate to ground level. Solution: Amend Table 12.7 to show depth to groundwater, and amend Table 12.8 to show surface elevation for each listed borehole. Additional Comments: Table 12.7 presents a summary of groundwater elevations at 18 groundwater monitoring stations within the local area. This does not include groundwater depths relative to groundwater level. When taking this into consideration, 9 of the 18 stations show artesian or sub-artesian conditions, with maximum hydraulic head at less than 2 mbgl. This combined with the presence of multiple springs and standing water bodies within the draft Order limits area suggests that artesian and/or sub-artesian conditions could be encountered during construction works.	Tables 12.7 and 12.8 in ES Chapter 12: Water Resources [APP-061] will be updated at a future Deadline 1 for depth relative to groundwater within boreholes to include depth to groundwater, ground elevations, and artesian indicators. An Environmental Information Request has been submitted to the Environment Agency to verify whether further groundwater monitoring locations exist within the wider study area to ensure the dataset reflects all reasonably available information. The conceptual model conceptual model will be updated at a future Deadline. Regarding the statement that the “<i>presence of multiple springs and standing water bodies within the draft Order limits area suggests that artesian and/or sub-artesian conditions could be encountered during construction works</i>”, no springs were encountered during either the Hydrology or Ecology walkovers, and this is reflected in ES Figure 7.2: Habitats and Ecological Features [APP-110] and ES Figure 12.1: Ephemeral Ditches [APP-115].



Reference number	Representation	Applicant response
	One groundwater monitoring location within the study area which is available in the Hydrology Data Explorer (Hydrology Data Explorer - Explore) but not included in Table 12.7, is Brink Hill (TF7636621253). The Applicant should note that other data may be available which is not available within the Hydrology Data Explorer. The Applicant is welcome to submit an Environmental Information Request to the Environment Agency to check for any other hydrology monitoring stations within the Study Area and should consider the use of the Environment Agency's North East Anglia Chalk model, both of which may help to inform and check the Applicant's hydrogeological site conceptual model. Please be aware that BGS online mapping does not have available data showing the presence of faults in much of the East Anglia chalk. The lack of mapped structural features does not indicate that these are not present. Comparison of the stated interpolated groundwater level and our LiDAR records for the stated coordinates in Table 12.8 indicate that several of the interpolated values are significantly above ground level.	
EA20	ID: EA19 (Accuracy of Hydrogeological Model) Environmental Statement Chapter 12: Water Resources [APP-061], Section 12.6.39 and Figures 12.6, 12.8, 12.9 and 12.10 Issue: The accuracy of the hydrogeological model is unclear. Impact: The anticipated depth to groundwater is significantly based on the hydrogeological model, which may result in impacts to groundwater quantity and quantity if insufficient mitigation is in place. Solution: The Applicant should commit to carrying out further intrusive investigations within the draft Order limits area including groundwater level monitoring over a range of atmospheric conditions including periods of high rainfall, and refine the hydrogeological model accordingly. The findings should be used to refine detailed foundation and trenchless installation design. Additional Comments: Section 12.6.39 and Figures 12.8 and 12.9 present interpolated minimum and maximum static groundwater level depths within the Core Study Area, however the discrepancies between recorded and interpolated groundwater elevations, and interpolated groundwater elevations and surface elevations, raise concerns about the level of confidence in the hydrogeological model. Figure 12.6 demonstrates that the groundwater monitoring borehole network used to inform the model covers a relatively small number of locations across an extensive area and notably excludes any data from within the draft Order limits. The apparent resolution of the hydrogeological model focusing on the draft Order limits are shown in Figures 12.8 and 12.9 seems inconsistent with that of the source data. The limited groundwater elevation data is acknowledged in Section 12.6.42.	It is noted that the current conceptual model relies on a limited number of groundwater monitoring locations, situated largely outside the Order limits. It is acknowledged that the current model has not yet integrated regional controls including regional interpretation shown in the NEAC groundwater model and potentiometric surfaces shown in the BGS Hydrogeological Map (1976). Following an Environmental Information Request, the conceptual model will be updated at a future Deadline. It will integrate outputs from the NEAC groundwater model, particularly for the wet-month scenario to ensure the conceptual understanding aligns with regional flow patterns. It should however be noted that the conceptual model was intended as a screening-level assessment with the purpose of identifying whether shallow groundwater poses a risk to foundations, trenchless installation or local construction processes, and was not intended to represent a definitive or high-resolution groundwater flow model. Paragraph 12.8.23 of ES Chapter 12: Water Resources [APP-061] and Table 4.8 of the oCEMP [APP/7.6.1] commits to installing boreholes within the Order limits to monitor groundwater levels prior to construction to ensure that construction activities, such as HDD and foundations, do not occur when groundwater levels are high enough to interact with the activity, and the data could be used to refine the hydrogeological model.
EA21	ID: EA20 (Boreholes) Environmental Statement Chapter 12: Water Resources [APP-061], Section 12.6.50 Issue: BGS borehole groundwater depths have been reported inaccurately in Section 12.6.50.	It is noted that there are minor discrepancies in recording of borehole groundwater depths within Section 12.6.50 of ES Chapter 12: Water Resources [APP-061]. These will be checked and updated for a future deadline. However, the borehole records were used to verify the groundwater surface developed through groundwater monitoring station data and an update of these borehole groundwater depths will not change the groundwater elevation surface.



Reference number	Representation	Applicant response
	Impact: Limits understanding of the hydrogeological conceptual model. Solution: Update Section 12.6.50 so that it refers to the correct borehole groundwater depths. Additional Comments: Section 12.6.50 states that BGS borehole records show groundwater rest levels in selected abstractions in the BC dataset at 9.7 mbgl (TF81SW12) and 18 mbgl (TF81SW26). The latter is inaccurate; the BGS record for TF81SW26 shows an intake depth of 18 mbgl and does not state a groundwater elevation.	
EA22	ID: EA21 (Trenchless Installation Methods) Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.7.7. and 12.8.22 Outline Construction Environmental Management Plan [APP-186], Tables 7 and 18 Issue: Section 12.7.7 excludes some key mitigation measures related to the hydrological environment. Impact: Exclusion of key mitigation for trenchless installation methods could result in unacceptable impacts to controlled waters. Solution: Update Section 12.7.7 to include missing mitigation measures. See Additional Comments for further details. Additional Comments: Measures currently absent from Section 12.7.7 which should be included: - Hydrogeological Impact Assessment (HIA) for all trenchless crossings due to sensitivity of watercourses and Principal aquifer, including Water Features Survey for all surface water bodies - Development of drilling fluid breakout plans for all trenchless crossings - Clarify the launch/receptor pit working area distance from watercourses These measures should also be reflected in Section 12.8.22 of Chapter 12 as well as the outline CEMP. It is acknowledged that Table 7 and 18 of the outline CEMP states that there will be a Horizontal Directional Drilling (HDD) risk assessment and contingency plan produced to identify breakout risks, but this must be a full management plan to mitigate against risk of breakout and control any spills.	Table 17 of oCEMP [APP/7.6.1] states that a “<i>Hydrogeological Risk Assessment would be undertaken in consultation with the Environment Agency</i>” in relation to unidentified risks to groundwater. The oCEMP [APP/7.6.1] has been updated at Deadline 1 to make this specific to HDD operations. The principles of a drilling fluid breakout plans for all trenchless crossings is presented in Table 3.8 of the oCEMP [APP/7.6.1]. However, for completeness, the oCEMP [APP/7.6.1] has been updated at Deadline 1 to state that a breakout plan will form part of the detailed Construction Environmental Management Plan. Paragraph 12.8.22 references the oCEMP [APP/7.6.1], which contains mitigation measures of trenchless installation methods / HDD crossings. At this stage, the location of launch pits for HDD is not defined. There are no watercourses within the Order limits which require HDD.
EA23	ID: EA22 (Shallow Groundwater) Environmental Statement Chapter 12: Water Resources [APP-061], Section 12.8.23 Environmental Statement Appendix 12.3: Water Framework Directive Assessment [APP-171], Table 12-4 Issue: Section 12.8.23 states that HDD works, if required, would not take place when groundwater levels are within 15m of ground level, as informed by monitoring boreholes to be installed prior to the construction phase. The current groundwater conceptual model is based on triangulation from a series of boreholes remote from these locations.	Paragraph 12.8.23 of ES Chapter 12: Water Resources [APP-061] states that HDD works would not take place if groundwater levels were within 15m BGL based on pre-construction monitoring boreholes. This measure was intended as a precautionary safeguard until additional site-specific groundwater level data becomes available. An alternative construction methodology will be selected if groundwater conditions require it, and the Design Principles, Parameters and Commitments [APP/5.8.1] has been updated at Deadline 1 to reflect this. The oCEMP [APP/7.6.1] commits to groundwater borehole monitoring within the Order limits and will be decommissioned in accordance with best practice at the time.



Reference number	Representation	Applicant response
	Impact: There is a risk that groundwater levels may be higher than anticipated, rendering this approach impossible. Solution: The Applicant should account for an alternative approach in the event groundwater levels are shallower than expected. Additional Comments: Table 12-4 states that HDD works are indicated to potentially extend to 15 mbgl and could interact with maximum groundwater level in sections of Fields 25 to 27, 29 and 30. The Applicant should note that all monitoring boreholes should be decommissioned in accordance with best practice guidance when no longer required, in order to prevent these from acting as a preferential pathway into the underlying Principal aquifer.	
EA24	ID: EA23 (Interaction with Groundwater) Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.8.15, 12.8.19 and 12.8.20 Issue: Groundwater elevations within the draft Order limits area are anticipated to be below the maximum extent of foundation structures, excluding potential minimal overlap with the maximum likely pile depth at the BESS and Substation sites. Impact: Potential for depth to groundwater to be underestimated, and potential for groundwater to be encountered within solar photovoltaic (PV) Array Mounting Structure pile depth and a greater than anticipated proportion of the maximum BESS and Substation sites. There is a risk of encountering artesian conditions. Solution: The Applicant should conduct intrusive investigations across the PV Array areas including groundwater monitoring to confirm the presence and characteristics of groundwater. Additional Comments: The report concludes that there is limited potential for the installation of Mounting Structures for the Solar PV Arrays to impact groundwater, as this has been modelled to have a maximal depth to between 4.0 and 40 mbgl. This is currently supported by very limited intrusive data. The report concludes that the maximum depth of piled foundations at the BESS, Customer Substation and National Grid Substation sites could marginally interact with groundwater based on triangulation of regional borehole level data. This is not supported by suitable groundwater level data from the draft Order limits area. We note that Section 12.8.20 confirms that the required piling depth will be considered in the context of the highest groundwater level, additional measures are to be implemented. Groundwater monitoring should be undertaken over a sufficient period to be representative of seasonal variation including worst-case groundwater levels and thus should include monitoring for at least six months including the winter period.	It is noted that the current conceptual model relies on a limited number of groundwater monitoring location, situated largely outside the Order limits. It is acknowledged that the current model has not yet integrated regional controls including regional interpretation shown in the NEAC groundwater model and potentiometric surfaces shown in the BGS Hydrogeological Map (1976). Following an Environmental Information Request, the conceptual model will be updated at a future deadline to reflect the Environment Agency's levels, if more conservative than that of the Applicant. It will integrate outputs from the NEAC groundwater model, particularly for the wet-month scenario to ensure the conceptual understanding aligns with regional flow patterns. An Environmental Information Request has also been submitted to verify whether further groundwater monitoring locations exist within the wider study area to ensure the dataset reflects all reasonably available information. Following an Environmental Information Request, the conceptual model will be updated at a future Deadline. The oCEMP [APP/7.6.1] commits to groundwater borehole monitoring within the Order limits. This monitoring data will be used to replace or refine interpolated groundwater surfaces presented within ES Chapter 12: Water Resources [APP-061] and used to confirm whether PV arrays or foundation zones may interact with groundwater which will determine whether specific mitigation measures are needed. ES Chapter 12: Water Resources [APP-061] will be updated at a future Deadline to confirm that the depth of PV array piles and foundation design for the BESS and substations will be reassessed against the refined highest groundwater elevation dataset and the Design Principles, Parameters and Commitments [APP/5.8.1] has been updated at to reflect this. Paragraph 12.8.20 of ES Chapter 12: Water Resources [APP-061] commits to pile depth being designed to maximum groundwater elevation. If groundwater proves shallower than currently inferred, mitigation measures will be applied. If artesian pressures are identified locally, works will be designed or sequenced to ensure no groundwater breakthrough or loss of control during piling.
EA25	ID: EA24 (Foundation Works Risk Assessment) Environmental Statement Chapter 12: Water Resources [APP-061], Section 12.8.2 Environmental Statement Appendix 12.2: Flood Risk Assessment [APP-170], Sections 12.2.39 and 12.5.3	The Scheme has Work Nos. and does not have a detailed design at this stage, and therefore the type and depth of foundations to serve Work Nos. 2 – 4 are not fully developed at this stage. All piling and foundation methods will be determined via a FWRA, following groundwater monitoring, and this has been updated within the oCEMP [APP/7.6.1]. Groundwater monitoring will be undertaken over a sufficient period to be representative of seasonal variation including worst-case groundwater levels and thus should



Reference number	Representation	Applicant response
	Issue: Section 12.2.39 of the Flood Risk Assessment (FRA) states that “once the detailed design is complete, and if the required piling depth exceeds the highest recorded groundwater level, then a Foundation Works Risk Assessment will likely be required”. Impact: Risk that piled foundations may not be supported by a FWRA, when all foundation structures on the Proposed Development could create preferential flow pathways to impact the underlying Principal aquifer. Solution: Due to the sensitivity of groundwater resources within the Proposed Development and presence of minimal or absent superficial cover, all piling and other foundation methods should be determined via FWRA informed by site specific data. Additional Comments: The FRA states that a FWRA will likely be required if the required piling depth exceeds the highest recorded groundwater level to ensure that groundwater is not displaced by piled foundations. Due to the high sensitivity and vulnerability of groundwater within the entire draft Order limits area, we consider that all piled foundations should be supported by an FWRA. Separate to this, we note that sources of information used in preparation of the FRA are listed in Section 12.5.3, however the list does not include the Environment Agency’s Hydrology Data Explorer (mentioned as the primary source of groundwater elevation data used in hydrogeological modelling in Section 12.6.85) nor the July 2025 information on licensed abstraction records received from the Environment Agency via information request (mentioned in Section 12.6.53 and additionally in Table 12-3 of Appendix 12.1). These should be included in the reference list.	include monitoring for at least six months, including the winter period, and the commitment in the oCEMP [APP/7.6.1] requires Environment Agency approval before the monitoring commences. The oCEMP [APP/7.6.1] has been updated to state that the final choice of foundations for Work Nos. 2 to 4 will not indirectly interact with the underlying aquifer.
EA26	ID: EA25 (Construction Mitigation Measures) Commitments Register [APP-179], Table 1-1 Issue: The construction mitigation measures for HDD lack detail and mitigation measures for BESS and Substation foundation are absent. Impact: Potential that critical mitigation measures could be missed. Solution: The measures should also refer to groundwater level monitoring prior to construction to ensure HDD works do not interact directly with groundwater, the production of HIAs and drilling fluid breakout plans. The measures should include the production of a FWRA based on groundwater level monitoring to support the design of piled foundations. Additional Comments:	Mitigation measures are secured within Table 7 of the oCEMP [APP/7.6.1] and has been updated at Deadline 1 to confirm that a Foundation Works Risk Assessment, HIAs and drilling fluid breakout plans will be undertaken for foundations at the Scheme based on groundwater monitoring levels of boreholes to be installed within the Order limits. As outlined within paragraph 12.8.23 of ES Chapter 12: Water Resources [APP-061], groundwater monitoring will occur prior to the commencement of the construction phase to ensure that HDD does not have the potential to interact directly with groundwater.
EA27	ID: EA26 (Drilling Fluid Breakout Plan) Outline Construction Environmental Management Plan [APP-186], Tables 6, 7 and 17 Issue: It is stated in Tables 6 and 17 that no monitoring is required for drilling fluid seepage during borehole operations. Impact: Surface breakout of borehole drilling fluid may go undetected and unmitigated, which could have detrimental impacts on controlled waters.	Table 7 of the oCEMP [APP/7.6.1] states that monitoring activities will occur to reduce the risk of breakout during drilling. The oCEMP [APP/7.6.1] has been updated at Deadline 1 to explicitly state that a Drilling Fluid Breakout Plan will be included in the detailed Construction Environmental Management Plan to be submitted prior to the construction phase. Tables 6 and 17 of the oCEMP [APP/7.6.1] has also been updated at Deadline 1 to state that monitoring activities, a Foundation Works Risk Assessment, HIAs and drilling fluid breakout plans will occur to reduce the risk of breakout during drilling.



Reference number	Representation	Applicant response
	Solution: The Applicant should ensure that a drilling fluid breakout plan is developed for trenchless installations, and that this includes observation of the drilling route during drilling operations to identify and mitigate breakout should this occur. Additional Comments: The above contradicts the mitigation stated in Table 7 for 'Horizontal Directional (HDD) Drilling Fluid Breakout Risk'.	
EA29	ID: EA27 (Hydrogeological Impact Assessment) Outline Construction Environmental Management Plan [APP-186], Tables 6, 7 and 17 Issue: Table 6 refers to applying 'appropriate mitigation' where trenchless techniques are to be employed. Impact: The definition provided in the table is vague and mitigation measures may not be sufficient. Solution: Tables 6 and 7 should refer to the production of a HIA for trenchless works, which would set out the necessary mitigation measures. Mitigation of trenchless drilling impacts should also be included in Table 17. Additional Comments: The mitigation measures in Table 7 should explicitly reference the production of a HIA for trenchless crossings	The Applicant refers to its response to EA23 above.
EA30	ID: EA28 (Spills and Leaks) Environmental Statement Chapter 5: The Scheme [APP-054], Sections 5.4.36 and 5.4.50 Environmental Statement Chapter 12: Water Resources [APP-061], Section 12.7.7 Outline Construction Environmental Management Plan [APP-186], Tables 7 and 18 Issue: Mitigation measures to prevent spills and leaks from construction compounds are not currently well defined. Spillages of fuel or drilling fluid are not mentioned in the outline CEMP. Impact: Risk of polluting controlled waters. Solution: The Applicant should provide details of mitigation proposals to prevent fugitive emissions from temporary construction compound(s) and decommissioning compounds from impacting controlled waters. The Applicant should update the list included in Section 5.4.36 and the outline CEMP to ensure all risks are managed. Section 5.4.50 should clarify whether sheltered means fully covered (i.e. no rain access), and if any storage will utilise double-skinned tanks. Additional Comments: Section 12.7.7 commits to avoiding siting construction compounds within 10m of watercourses. These should also not be positioned within groundwater SPZ1 (as stated will be the case where possible in Table 7 of the outline CEMP), or within 50m of private groundwater abstractions. Due to the high sensitivity of groundwater resources, the construction compound(s) should employ a high standard of mitigation to avoid pollutants being discharged to ground from vehicles, mobile and fixed plant, equipment and construction activities carrying an elevated risk of pollution such as refuelling and concrete mixing.	As outlined in Table 18 of the oCEMP [APP/7.6.1], machinery will be regularly maintained to minimise the potential for fuel or oil leaks and spillages to occur. All maintenance will be conducted over drip trays or suitably absorbent spill pads to minimise the potential for groundwater and surface water pollution. All machinery will be equipped with drip pans to contain minor fuel spillage or equipment leakages. It is also stated that temporary construction compounds will be sited outside Source Protection Zone 1 where possible to reduce likelihood of groundwater contamination further. Paragraph 5.4.36 of ES Chapter 5: The Scheme [APP/6.1.2] has been updated at Deadline 1 to reference fugitive emissions from temporary Construction Compound(s). Paragraph 5.4.50 will clarify whether sheltered means fully covered (i.e. no rain access), and if any storage will utilise double-skinned tanks. Mitigation measures at Construction Compounds within the oCEMP [APP/7.6.1] has been made reference to.



Reference number	Representation	Applicant response
	The same principles should be applied to decommissioning compounds during the Decommissioning phase. Further fuel and oil storage guidance is available: Pollution prevention for businesses - GOV.UK In the Chemical Pollution section of Table 7 and 18, under the 'Potential Hydrocarbon Contamination' it says that refuelling will be "at least 10 m away from drains", we believe this should be amended to acknowledge watercourses too.	
EA31	ID: EA29 (Unexpected Contamination) Outline Construction Environmental Management Plan [APP-186v], Tables 6 and 17 Outline Operational Environmental Management Plan [APP-188], Tables 3-6, 3-7, 4-6 and 4- 7 Outline Decommissioning Strategy [APP-190], Tables 6 and 17 Issue: The stated mitigation measures do not include a watching brief for unexpected contamination or a Discovery Strategy. Impact: Potential for unexpected sources of contamination not to be identified and adequately managed where encountered. Solution: Tables should be updated to include the provision of a watching brief for unexpected contamination and a Discovery Strategy to be employed where contamination is encountered. Additional Comments: Although unlikely, maintenance and other activities during the operational phase may include limited excavation which could potentially encounter previously unidentified contamination. Personnel carrying out excavation and other ground disturbing activities during all phases of the Proposed Development should be briefed on maintaining observations for visual and olfactory indicators of contamination, and the requirements of the Discovery Protocol if these are encountered. The table numbering in the List of Tables on page iv of the Decommissioning Strategy is incorrect and inconsistent with the content of the report.	The oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1] have all been updated at Deadline 1 to include the provision of a watching brief for unexpected contamination and a Discovery Strategy to be employed where contamination is encountered. During this update, the oDS [APP/7.10.1] has had the page numbers updated as presented on page iv.
EA32	ID: EA30 (Contaminated Soils) Outline Soil Management Plan [APP-193] Issue: The outline Soil Management Plan does not address management of contaminated soils if encountered. Impact: Risk of impacts to soil and groundwater quality if contaminated soils are inappropriately managed. Solution: Update the outline Soil Management Plan to direct readers to the contamination mitigation measures described in the outline CEMP. Additional Comments: Potentially contaminated soil should be segregated from uncontaminated soils in order to prevent cross-contamination and minimise the volume of soil requiring disposal or remediation.	The Applicant notes and agrees with this comment. This matter will be addressed in the detailed Soil Management Plan that is to be produced before the commencement of the construction phase, as a requirement under the DCO.



Reference number	Representation	Applicant response
EA34	ID: EA31 (Removal of Buried Cables) Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.7.15, 12.8.130 and 12.8.181 to 12.8.183 Outline Operational Environmental Management Plan [APP-188], Section 12.8.137 Outline Decommissioning Strategy [APP-190], Section 2.1.5 and Table 7 Issue: The decommissioning proposals do not determine whether buried cabling would be removed, or detail the mitigation measures to minimise their potential to act as a contamination source if retained. Impact: Potential for cables left in-situ to act as a source of groundwater contamination which may impact groundwater quality. Solution: If cable removal is not adopted at the decommissioning phase, the Applicant should demonstrate that cables left in-situ indefinitely would not pose a potentially significant source of contamination to controlled waters. The Applicant should provide a suitable reference to confirm that cables retained at 0.6m depth and greater would be below ploughing depth. The outline Decommissioning Strategy should specify how cables retained in-situ would be cut and sealed. Underground cabling should have a design lifespan at least commensurate with the operational phase of the Proposed Development. Additional Comments: The Applicant has proposed that some or all buried cables may be left in-situ indefinitely at decommissioning. The Environment Agency does not currently have specific guidance or a regulatory position about this in the context of groundwater and land contamination. However, we recommend that cables are removed entirely at the end of the project's functional lifespan. Further, we ask the Applicant to consider the potential effects of cables being left in situ, such as deterioration of plastic and metal over extended time periods, and the release of these materials into soil and groundwater. The Applicant should refer to regulatory guidance and general best practice at the time of decommissioning. Whilst the current intention may be for these to be left in the ground, we strongly recommend that the applicant considers full cable removal in their designs. Allowance should be made at this stage for cable removal should it be later deemed necessary, so that the method of installation does not mean this cannot be reasonably achieved. It is important to consider that use of plastic ducting to facilitate easy removal of cables may have its own impacts. This ducting could degrade over time in a similar manner to plastic cable housing, with some residual risk to sensitive receptors. Section 12.8.183 report states that foundations and other below ground infrastructure will be cut to 1.2m below the surface, and that cabling will typically be installed at a depth of between 0.6m and 1.2m. If cables are retained within ploughing depth these may damage agricultural equipment and release contaminants into the soil. If cables are proposed to be retained these should be cut and sealed in a manner to minimise the rate of degradation and potential contaminant release.	The oDS [APP/7.10.1] states that at the decommissioning phase, all below-ground cabling will be left in situ, as this would allow for the cultivation of land after the Scheme has been decommissioned. This approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Scheme. This is principally in accordance with the approach taken at the recently approved Springwell DCO. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route. Typical agricultural ploughing depth usually ranges between 0.15 to 0.45 m and as such, cables at a depth of 0.6 m BGL would be unaffected if left in-situ following decommissioning of the Scheme. The oDS [APP/7.10.1] has been updated at Deadline 1 to commit to specifying the technique to cut and seal cables prior to the decommissioning phase, based on best practice at the time. The oCEMP [APP/7.6.1] has been updated at to commit that bentonite used for trenchless drilling, or elsewhere in the Scheme, has not been treated with chemicals containing PFAS. It should be noted that PFAS chemicals are not typically used for the coating of solar PV arrays.



Reference number	Representation	Applicant response
	Per- and polyfluoroalkyl substances (PFAS) should be avoided wherever possible in construction materials used for the project, including buried infrastructure such as cabling and also for use in solar PV panel coatings. PFAS are ‘forever chemicals’ that will negatively affect water quality. Risk from PFAS can be increased during washing to keep them clean, for maximum efficiency of energy generation. We would advise the Applicant to check with the panel manufacturers if the materials used have any PFAS risk, and if design is unknown consider committing to PFAS-free panels. If panels containing PFAS are used, we suggest that there is consideration of this in the outline Operational Environmental Management Plan (OEMP) and outline Decommissioning Strategy. For example, if PFAS coating is damaged there is a risk of persistent chemicals entering the natural environment during heavy rainfall, washing, maintenance, and removal. The OEMP should also incorporate measures to minimise the risk of panel coatings becoming damaged via ‘thermal shock’ such as if cleaned whilst at a high temperature due to prolonged exposure to sunlight. We note that Section 12.8.137 and the outline OEMP commit to avoiding the use of chemical cleaning products, with the plan stating that only water (preferably deionised) would be used for PV panel cleaning. Care should also be taken when wiping panels to avoid surface microabrasions. The Applicant should also ensure that any bentonite used for trenchless drilling, or elsewhere in the scheme, has not been treated with chemicals containing PFAS. Fuel, oils and other chemicals, such as cleaning agents and decontaminants, should be PFAS-free wherever possible.	
EA35	ID: EA32 (Drainage System) Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.7.15, 12.7.16 and 12.8.180 Environmental Statement Appendix 12.2: Flood Risk Assessment [APP-170], Section 12.4.16 Issue: It is unclear how the surface water drainage infrastructure at the BESS, Customer Substation, National Grid Substation and infiltration basin would be managed at decommissioning stage. Impact: As the drainage systems for these aspects of the development may include some shared infrastructure, the removal of part of the drainage system during decommissioning may compromise the system design mitigation. Solution: The Applicant should clearly define how drainage systems at the BESS, Customer Substation, National Grid Substation and infiltration basin will interact, and how the removal of components of these systems at decommissioning stage will be designed and implemented without introducing new pollution risks and enabling restoration of the Site. Additional Comments: Section 12.7.15 states that the BESS units and Customer Substation would be removed from the Site and recycled or disposed of in accordance with good practice, including removal of foundations and other below ground infrastructure to 1.2m below surface and removal of piles. Section 12.7.16 indicates that the National Grid Substation and Grid Connection Infrastructure would remain in-situ.	As detailed within paragraph 12.4.16 of ES Appendix 12.2: Flood Risk Assessment [AS-053], any infrastructure that is to remain in place after the lifetime of the Scheme will retain the drainage features which serve it. The Scheme has Work Nos. and does not have a detailed design at this stage. However, the Applicant notes that Requirement 11 of Schedule 2 of the draft DCO [APP/3.1.1] states that “<i>no part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and approved by the relevant planning authority</i>”.



Reference number	Representation	Applicant response
	Section 12.4.16 of the FRA states that the BESS and Substation Compounds drainage design consists of two drainage catchments which will connect to manholes via filter drains, which will in turn connect to a tank or tanks to act as surface water attenuation and firewater storage. The information provided suggests that at least part of the drainage system and firewater storage infrastructure will be shared between infrastructure due for removal and infrastructure due to be retained. The report states “where infrastructure would be left in place (e.g. foundations for onsite buildings), drainage features would also remain where this is compatible with the detailed CEMP”.	
EA36	ID: EA33 (BESS Mitigation Measures) Outline Construction Environmental Management Plan [APP-186] Issue: The outline CEMP does not clearly state that the BESS units will not be installed until the mitigation measures are in place. Impact: Should a BESS fire occur during construction prior to all mitigation being in place, this could result in contamination of controlled waters. Solution: The Applicant should clearly state in the outline CEMP and outline Battery Safety Management Plan (BSMP) that no BESS batteries will be taken onto site until the BESS drainage and fire management systems are in place and have been commissioned. Additional Comments:	There are site design safety elements that will be in place prior to the BESS being installed (i.e. drainage, water supply, roads etc). However, some fire management systems are embedded in the BESS; Fire Detection, Fire Suppression, on board Monitoring etc., these will only be activated when the BESS is in situ and able to transmit to the Operations Control Room. The status of each BESS is accessible on the control panel of the BESS and prior to installation this will be checked to determine the serviceability) and functioning of all safety measures) of the BESS prior to removal from transportation.
EA37	ID: EA34 (Penstock Valve) Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.8.144 and 12.8.147 Environmental Statement Appendix 12.2: Flood Risk Assessment [APP-170], Sections 12.4.18, 12.4.41 and 12.4.42 Outline Operational Environmental Management Plan [APP-188], Table 3-7 Outline Battery Safety Management Plan [APP-194], Table 6.1 Item 12 Issue: It is unclear as to whether the automated penstock valve at the BESS, Customer Substation and National Grid Substation Sustainable Drainage Systems (SuDS)/contaminated water tank would have backup manual operation. Impact: Risk of direct release of potentially contaminated firefighting water into the environment if the automatic penstock valve fails during an incident and there is no backup manual operation. Solution: The Applicant should confirm that the penstock valve will also have backup manual operation, and that the valve will be subject to a programme of regular inspection and maintenance. This should be consistently referenced across the ES submission documents. The Applicant should update Chapter 12, the FRA and the outline BSMP to clarify the trigger for penstock automatically closing. Additional Comments: We note that Table 3-7 of the outline OEMP commits to regular testing of penstocks and for repairs to be undertaken promptly if required.	As confirmed within ES Appendix 12.2: Flood Risk Assessment [AS-053], the penstock valve on the contaminated water tank will automatically shut off in the event of a fire suppression event and closed until testing of the contaminated water has taken place. The oOEMP [APP/7.8.1] commits to the testing of the penstocks on a regular basis and repairs undertaken promptly if required. In the event that the penstock automated system fails, there will be an option to manually close the penstock valve and that the valve will be subject to a programme of regular inspection and maintenance. This will be detailed within ES Appendix 12.2: Flood Risk Assessment [AS-053] as updated at a future deadline.



Reference number	Representation	Applicant response
	This is essential to ensure the penstock remains in good condition to always close promptly when required.	
EA38	ID: EA35 (Removal of Captured Firefighting Water) Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.8.144 and 12.8.147 Environmental Statement Appendix 12.2: Flood Risk Assessment [APP-170], Sections 12.4.18, 12.4.41 and 12.4.42 Outline Operational Environmental Management Plan [APP-188], Table 3-7 Outline Battery Safety Management Plan [APP-194], Table 6.1 Item 12 Issue: It is stated that captured firefighting water would either be tested and removed offsite to a licensed facility or discharged to groundwater. Permitted consent would be required to discharge firefighting water, the timescales for which are substantial. Impact: The timescales required to receive permitted consent carry a significant risk that further rainfall events or a second fire requiring more firefighting water to be applied could exceed the storage capacity of the drainage system. This could in turn lead to pollution of the environment. Solution: If the Applicant intends to retain an option of discharging firefighting water to groundwater, it must be demonstrated that they will be able to manage the risks associated with this approach. The Applicant must be able to ensure that contained firefighting water is removed and the drainage system decontaminated at the earliest opportunity following a fire event to ensure that the storage capacity of the system is not overwhelmed by subsequent rainfall or a second fire event. This is likely to be most readily achieved by tankering away the stored firewater. The Applicant should provide details of what testing is proposed in the event of a fire. In the absence of suitable mitigation measures, all spent firefighting water should be tankered offsite to a licensed facility. Additional Comments: It should be noted that the time taken to issue a Groundwater Activity Permit may be substantial, with decisions on applications usually being made within 4 months (Discharges to surface water and groundwater: environmental permits - GOV.UK). We note that Table 6.1 Item 12 within the outline BSMP states that after a fire, all firefighting water will be contained within a purpose-built tank, tested and, if applicable, treated prior to being released to ground. It does not mention that discharge of firewater to ground following testing would require a Groundwater Activity Permit. The Plan should be updated to make it clear that discharge of firewater to ground would be subject to gaining an environmental permit from the Environment Agency's National Permitting Service. It is unclear what testing is proposed. Testing is important to provide information around the quality of water that has been contained after a fire and will ascertain if it contains any contaminants and what level of risk to the water environment the contained firewater has. Firewater and other chemicals from BESS will deteriorate water quality unless it is contained and removed sufficiently.	ES Appendix 12.2: Flood Risk Assessment [AS-053] outlines that captured firewater could be tested and released to the hydrological environment should contaminants not be present. However, captured firewater will be tankered off Site. This has been confirmed within the oOEMP [APP/7.8.1] and will be confirmed in an update to ES Appendix 12.2: Flood Risk Assessment [AS-053] at a future Deadline, and this approach is in accordance with the Environment Agency's request for a tankered solution to spent firewater for the Great North Road Solar and Biodiverse Park DCO. As such, in the event of a battery fire, suppressant does not require testing as it will not be released to the wider hydrological environment. Section 2.14.3 of the oOEMP [APP/7.8.1] has been updated at Deadline 1 to make reference to the measures pertaining to the management of fire water also being detailed in the oBSMP [APP-194].



Reference number	Representation	Applicant response
	For advice, we expect that water samples would be taken, when safe to do so, which would then be sent to a UKAS accredited laboratory for analysis, using UKAS and MCERTS accredited methods (where applicable). The water samples should be checked against the list of hazardous substances in the surface water pollution risk assessment guide: Surface water pollution risk assessment for your environmental permit - GOV.UK The contaminated water storage tank(s) should be designed to be emptied by tanker should discharge to ground be impractical or not permissible. We note that Section 2.14.3 of the outline OEMP states that says that "Management of fire water is further described in ES Chapter 12: Water Resources". For completeness, this should be updated to also reference the outline BSMP.	
EA39	ID: EA36 (Underground Contaminated Water Tanks) Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.8.143 and 12.8.147 Issue: Spent firefighting water is proposed to be contained within a dedicated underground contaminated water tank(s), sized to contain 228m³ of spent fire suppressant plus a 1% Annual Exceedance Probability (AEP) event. Similar arrangements are proposed for the Customer Substation and National Grid Substation. Impact: This may result in the underground storage of hazardous substances within a Principal aquifer within SPZ2 which may not be compliant with Position Statement D2 of The Environment Agency's approach to groundwater protection. Solution: The Applicant should justify why the storage must be underground and commit to engineering and management standards to ensure there are no leaks from this infrastructure. This equally applies to the closed drainage system for the Customer Substation and National Grid Substation. Additional Comments: Position Statement D2 of The Environment Agency's approach to groundwater protection states: <i>The Environment Agency will normally object to new and increased underground* storage of hazardous substances in SPZ1. The Environment Agency will agree to such storage in principal and secondary aquifers outside SPZ1 only if there is evidence of overriding reasons why the:</i> <i>activity cannot take place within unproductive strata</i> <i>storage must be underground (for example public safety), in which case it is expected that the risks are appropriately mitigated</i> <i>For all storage of pollutants underground (hazardous substances and non-hazardous pollutants), the Environment Agency expects operators to adopt appropriate engineering standards and have effective management systems in place. These should take into account the nature and volume of the materials stored and the sensitivity of groundwater, including the location with respect to SPZs. * Underground storage constitutes storage whereby the tank is not wholly visible on a permanent basis and is not wholly accessible from ground level. Any tank that is partially set in the ground in a secondary containment and is totally accessible and wholly visible will be considered to be an above ground tank.</i>	ES Appendix 12.2: Flood Risk Assessment [AS-053] outlines that a closed system should be utilised to contain spent firewater in the event of a battery or substation fire, in accordance with best practice, and the use of tanks is a typical approach on sites which include BESS. ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated at a future Deadline to confirm that, should there be space following the detailed design of the Scheme, then aboveground, impermeably lined detention basins will be favoured over belowground structures. Additionally, there will be a commitment that the containment area will be fully cleaned prior to any shut-off valves being re-opened. Section 12.4 (paragraphs 12.4.40) of ES Appendix 12.2: Flood Risk Assessment [AS-053] states that the SuDS structures serving the BESS compound will be sized to accommodate the 1% AEP +40% CC and an additional 228m³, and this will be sufficient for storing the full fire suppressant volume during an extreme rainfall event.



Reference number	Representation	Applicant response
	Although under normal circumstances the proposed firewater storage tank(s) would not contain hazardous substances, the potential for these to be present in firewater following a BESS fire cannot be fully discounted. The Applicant should therefore satisfactorily demonstrate why a firewater storage solution cannot instead be implemented above ground. The storage tank(s) should be suitably engineered to ensure secure containment over the lifetime of the Proposed Development and should include secondary containment such as double-skinned construction. The Applicant should also ensure that the containment area is sized to be able to hold all firefighting water, during a storm event, and factor in climate change. The Applicant should confirm that the containment area will be fully cleaned prior to any shut-off valves being re-opened.	
EA40	ID: EA37 (Spills and Leaks – BESS and Substation Drainage Systems) Environmental Statement Chapter 12: Water Resources [APP-061], Section 12.8.129 Flood Risk Assessment [APP-170], Section 12.4.19 Issue: Absence of measures to identify and manage the risk of pollution during normal operation of the BESS and Substation sites, when surface water runoff would directly infiltrate into the underlying Principal aquifer (and SPZ2) and surface watercourses. Impact: Groundwater and surface water quality could be impacted by spills and leaks from normal operation (as distinct from a fire event) entering BESS and/or Substation surface water drainage systems. Solution: Specify mitigation measures to identify and manage these risks. We would suggest installing 'sentinel' monitoring systems at the BESS and Substation drainage system outfalls to quickly identify if pollutants are found to be entering the drainage system and enable remedial action. Hazardous or polluting substances must be stored, handled and disposed of in accordance with applicable regulations, and any plant or equipment containing these should be suitably engineered to avoid loss of these substances to ground. Additional Comments: Section 12.4.19 of the FRA states that all surface water from the BESS and Substation developments will ultimately drain into an infiltration basin (of worst-case volume 19,845m³). Any loss of contaminants into the drainage system under normal operational use, such as from spills and leaks) is likely to result in these migrating directly into the Principal aquifer (and SPZ2) via the infiltration basin. All oil-containing plant such as oil-filled transformers should be designed in accordance with appropriate standards including, as applicable, The Control of Pollution (Oil Storage) (England) Regulations 2001. Measures to prevent hydrocarbons from being discharged from the drainage system, such as oil-water interceptors, should be included and subject to regular cleaning and inspection.	ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated at a future Deadline and the oOEMP [APP/7.8.1] will be updated at Deadline 1 to confirm that drainage system outfalls, such as installing 'sentinel' monitoring systems, will quickly identify if pollutants are found to be entering the drainage system and enable remedial action. Additionally, it will contain a section to confirm that hazardous or polluting substances must be stored, handled and disposed of in accordance with applicable regulations, and any plant or equipment containing these should be suitably engineered to avoid loss of these substances to ground.



Reference number	Representation	Applicant response
EA41	ID: EA38 (Storage of Waste Batteries) Environmental Statement Chapter 12: Water Resources [APP-061], Section 12.8.139 Outline Operational Environmental Management Plan [APP-188], Section 2.11.2 Issue: Absence of mitigation measures relating to the storage of waste batteries. Impact: Potential for contaminant leakage from stored waste batteries prior to disposal which poses a risk to groundwater and surface water quality. Solution: Include measures to ensure that waste and/or damaged BESS batteries are stored and managed such that they do not pose a contamination risk, within the outline BSMP, Chapter 12 and outline OEMP. Additional Comments: Any waste battery storage arrangements should be designed to ensure that damaged and end-of-life batteries would be protected from precipitation, any leakages would be contained and not enter the BESS drainage system, and these would not pose a fire risk to adjacent infrastructure. The battery storage area must be impermeable, covered and bunded. We strongly recommend that a fire watch is maintained for all waste batteries, stored for any reason.	An oBSMP [APP-194] has been prepared as part of the DCO Application which sets out the mitigation measures to be secured via Requirement 6 of the draft DCO [APP/3.1.1]. End-of life or damaged BESS units are to be electrically disconnected from the system when identified as being required. When disconnecting damaged or defective units, a specific risk assessment shall be conducted prior to the removal of the defective module to ensure the safety of employees and contractors. Damaged or defective units will be inspected and placed in an approved protective container prior to being transported from Site, to ensure against any risk of contaminants entering ground- or surface water. End-of-life batteries awaiting regular replacement will be stored in situ. This is considered most appropriate due to existing contamination bunding and surface-water runoff protections associated with the BESS enclosure. Batteries that are removed from the BESS are not stored at the Site; they are returned to the battery manufacturer for repair/ refurbishment. As such a fire watch is not required at the site. Under current UK legislation, end-of-life BESS infrastructure is controlled under The Waste Batteries and Accumulators Regulations 2009. These require battery producers to receive, sort, and suitably handle batteries and deliver to an approved battery treatment operator for treatment and recycling. As such, any potential for contamination will be managed by transport offsite to one of these approved facilities. The oDS [APP/7.10.1] provides for decommissioned infrastructure to be managed in accordance with the applicable legislation relating to waste and recycling that is in force at that time, and is secured by Requirement 20 of Schedule 2 to the draft DCO [APP/3.1.1]. As requested by the Environment Agency in EA40 above, the oOEMP [APP/7.8.1] has been updated at Deadline 1 to commit to installing 'sentinel' monitoring systems for the drainage system serving Work Nos. 2 – 4 and therefore any leakage from damaged batteries being stored on Site will be detected and not released to the wider hydrological environment.
EA42	ID: EA39 (Fire Suppressant Chemicals) Outline Battery Safety Management Plan [APP-194], Appendix A Issue: Limited details provided regarding proposed fire suppressant chemicals. Impact: If fire suppressant systems contain polluting or hazardous chemicals, these could potentially impact groundwater quality if discharged to ground. Solution: Commit within the outline BSMP that details of fire suppressant chemicals will be provided in the detailed BSMP. Additional Comments: The Plan currently indicates that potassium carbonate is under consideration, and is "non-harmful to environment and presents no health and safety concerns to first responders". The physico-chemical properties of the selected suppressant should be confirmed via supporting documentation such as Material Safety Data Sheets.	Internal Fire Suppression System details will only be known once this infrastructure is selected. It should be noted that most commercially available Suppression media for BESS are PFAS free. The details of the Fire Suppression media will only be confirmed downstream on selection of the BESS (at the detailed design stage) and determination by the BESS manufacturer on what Fire Suppression system they will use.
EA43	ID: EA40 (Spacing of BESS) Outline Battery Safety Management Plan [APP-194], Table 6.1 Item 7 Issue: BESS units are proposed to be sited close together. Impact: There is a risk that firefighting methods may not be able to prevent propagation of fire along rows of BESS containers. Solution: The Applicant should demonstrate that the proposed spacing of BESS units would be sufficiently protective of groundwater quality in the event of a BESS fire.	The BESS separation distances are defined by the UL9540A Large Scale Burn Test, and the BESS original equipment manufacturer will determine from the results the minimum space required to avoid onward propagation via radiated heat / flames. The spacing of the BESS will be in accordance with the guidance provided by the BESS original equipment manufacturer. The spacing is therefore sufficiently protective of groundwater quality.



Reference number	Representation	Applicant response
	Additional Comments: The figure presented within Table 6.1 indicates a proposed BESS minimum unit spacing of 2.5m (Aisle, on the long edge of each container) and 0.15m on the short edge of each container.	
EA44	ID: EA41 (Thermal Effects of Buried Cables) Environmental Statement Chapter 12: Water Resources [APP-061] Issue: Omission of thermal effects of buried cables from potential contaminant sources in the Operational Phase Conceptual Site Hydrogeological Model. Impact: Inadequate consideration of all possible contaminants. Solution: Include these contaminants in future revisions of the model, and any conclusions and mitigation based on this model. Additional Comments: Underground electrical cables generate heat that dissipates naturally to the surrounding ground during power transmission. The levels of heat loss and dissipation will be dependent on numerous factors including cable design, soil structure, transmission voltage and engineering design. Where underground cables interact with groundwater bodies this could result in local degradation of groundwater quality and negatively impact nearby abstractions via the generation of a heat plume. Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023. We are mindful that work is being carried out in this area in relation to heating of groundwater from Ground Source Heating and Cooling (GSHC) systems, but there is currently no guidance relating to the potential thermal implications of high voltage buried electricity cables. The EA's Chief Scientist's Group has published a report for GSHC systems (Environmental Impacts of Temperature Changes from Ground Source Heating and Cooling Systems). In this study, a 'thermal plume' was defined as the region around a GSHC system that experiences a 1 degree C temperature change or greater. While the study is not directly applicable to thermal emission from underground cables, an equivalent benchmark could be considered when assessing heat pollution from underground HV cables. The Chief Scientist's Group states that the environmental factors with the greatest influence on thermal plume development include groundwater flow and bulk thermal conductivity. It identifies that impacts may occur by direct (temperature change) and indirect (e.g. changes in water chemistry) means. At this stage we are asking applicants to consider the potential thermal implications of buried cables, in relation to risks to groundwater, via desk-based assessment. We recognise that as this an emerging issue, this matter has not been raised previously within the pre-application stages for this project.	The final design of the cable trenches, including whether they will be fully sealed, will be determined during the detailed design phase. This will be informed by the results of ground investigations (as committed to within oCEMP [APP/7.6.1]), together with any relevant evidence, guidance, or emerging best practice. It is anticipated that the cables will be sealed (i.e., the cables will not be exposed, as they will incorporate an insulating layer protecting the conductor). Accordingly, thermal discharge from the cables is expected to be low, and the electrical cables are therefore not considered to present a risk of contaminating surface water or groundwater. Furthermore, the oCEMP [APP/7.6.1] sets out a range of measures designed to safeguard surface water and groundwater from pollution during cable installation activities. The detailed Construction Environmental Management Plan, to be prepared in accordance with Requirement 13 of the draft DCO [APP/3.1.1], will secure the implementation of the mitigation measures identified in the oCEMP [APP/7.6.1] (including a Bentonite Breakout Plan) and will provide detailed construction method statements for the installation of the cable trenches.
EA45	ID: EA42 (Missing Legislation) Flood Risk Assessment [APP-170], Section 12.4.1 Outline Construction Environmental Management Plan [APP-186], Tables 7 and 18 Issue: Omission of include The Environment Agency's approach to groundwater protection and National standards for sustainable drainage systems (SuDS) -	Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053] will be updated at a future deadline to include the addition of the EA's approach to groundwater protection and National standards for SuDS to the list of guidance and legislation. The drainage design for all electrical infrastructure compounds will ensure that hazardous or polluting liquids have limited potential to infiltrate into the ground. The spent fire suppression tank will be lined and have a penstock, as is secured through the oBSMP [APP-194].



Reference number	Representation	Applicant response
	GOV.UK from the list of guidance and legislation provided in Section 12.4.1 of the FRA. Impact: Risk of the BESS, Customer Substation and National Grid Substation drainage designs not being designed in accordance with all relevant guidance. Solution: Include The Environment Agency's approach to groundwater protection and National standards for sustainable drainage systems (SuDS) - GOV.UK in Section 12.4.1 and confirm the outline drainage proposals have been designed in accordance. Additional Comments: The Environmental Pollution Act 1995 states "<i>It is an offence to cause or knowingly permit the discharge of poisonous, noxious or polluting matter into relevant waters or into any underground strata</i>". The design of Substation and BESS drainage systems must ensure that spills and leaks from plant and equipment do not result in hazardous or polluting substances discharging to groundwater. Although it is suggested that the BESS Units would be mounted on concrete foundations, it is possible that compacted gravel may also be used. It is unclear if the Applicant is committing to fully sealed drainage. The Applicant should ensure that if compacted gravel is used, an impermeable lining is present underneath so that the BESS drainage is fully sealed. This should be updated in Chapter 12 and the BSMP. Tables 7 and 18 both state that "SuDS will treat runoff, which can reduce sediment and pollutant volumes in runoff before discharging back into natural drainage network". Further details of how the proposed SuDS will treat pollutants should be provided.	The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage strategy that will serve Work Nos. 2 – 4 will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. If concrete foundations are used, these will form the sealed surface. If compacted gravel is used as the surface, an impermeable membrane / liner will be installed so that the drainage system beneath the BESS is fully sealed and no infiltration to the ground is possible. Any spills, leaks, or firewater runoff is captured and managed through a contained drainage system and cannot reach the Principal Aquifer. This is secured through section 3.3 of Design Principles, Parameters and Commitments [APP/5.8.1]. The detailed drainage strategy that will be provided once detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), will provide further details of how the proposed SuDS will treat pollutants. Paragraph 12.4.27 of ES Appendix 12.2: Flood Risk Assessment [AS-053] states that SuDS features including semi permeable roads and infiltration basin will be sufficient to effectively mitigate any suspended solids, metals and hydrocarbons. The detailed design of the SuDS network for the Scheme will be provided to the EA (for permitting) and LLFA, following granting of the DCO, as outlined in paragraph 12.4.33 of ES Appendix 12.2: Flood Risk Assessment [AS-053].
EA46	ID: EA43 (Use of Concrete) Environmental Statement Chapter 5: The Scheme [APP-054], Section 5.3.53 and Table 5-1 Outline Construction Environmental Management Plan [APP-186], Table 7 Issue: The outline CEMP does not currently contain sufficient mitigation measures to protect water quality from the use of concrete. Impact: Risk of negatively impacting water quality. Concrete is a known source of hazardous substances, particularly during the curing phase. Solution: In addition to measures already included in Table 7 of the outline CEMP, include additional mitigation measures to ensure that risks of pollution as a result of concrete are adequately managed. Measures could include: • Identify all areas where concrete works are proposed • Specify whether any of these will be cast in-situ or pre-cast and delivered • For in-situ concrete pours, suggest timing, weather conditions, and runoff control. (These construction works should be minimised during heavy precipitation events and carried out during dry months where practicable). Additional Comments: Concrete will be used in the construction of numerous features of the Proposed Development including: the concrete foundation slab for Integrated Conversion Units and Standalone Conversion Units; reinforced concrete base for the BESS, and concrete pad in the joint bay.	Table 7 of the oCEMP [APP/7.6.1] secures mitigation measures to protect the hydrological environment during the use of concrete. The oCEMP [APP/7.6.1] has been updated at Deadline 1 to: • Identify all areas where concrete works are proposed • Specify whether any of these will be cast in-situ or pre-cast and delivered; and • For in-situ concrete pours, suggest timing, weather conditions, and runoff control. These construction works should be minimised during heavy precipitation events and carried out during dry months where practicable.



Reference number	Representation	Applicant response
EA47	ID: EA44 (Wheel Washing Facilities) Environmental Statement Chapter 5: The Scheme [APP-054], Section 5.3.25 Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.8.47 and 12.8.83 Issue: It is unclear how any water from wheel washing facilities will be contained and disposed of. Impact: Risks of water containing sediment and contaminants entering watercourses and decreasing water quality, if wash water is not managed correctly. Solution: Include further details relating to the containment and disposal of wheel wash water within Chapters 5 and 12, and ensure there are sufficient mitigation measures included within the outline CEMP. Mitigation measures associated with wheel washing facilities could include: - Ensuring these activities will be undertaken within a designated impermeable or lined area and should not be allowed to discharge into a watercourse - Any SuDS incorporated around wheel washing facilities should provide sufficient treatment for suspended sediment, metals and hydrocarbons. Additional Comments: It is acknowledged that Sections 12.8.47 and 12.8.83 state that vehicle washing will utilise dry wheel wash facilities where possible. This is welcomed, however, where water will be used it must be clarified how this will be managed to pose no risk to the water environment.	Table 7 of the oCEMP [APP/7.6.1] states that the wheel wash facility will work on a closed cycle, which limits the potential for 8 contained releases of pollutants to the hydrological environment. The oCEMP [APP/7.6.1] has been updated at Deadline 1 to outline how water from the wheel wash will be disposed of, if dry wheel wash facilities are not used, which is likely to involve a sump and an impermeable lined designated area for such activities. The sump will act to capture sediment. Given the absence of watercourses within Work Nos. 1 to 4, which includes Site entrances, it is highly unlikely that wheel washes will discharge to a watercourse.
EA48	ID: EA45 (Water Quality Monitoring) Outline Construction Environmental Management Plan [APP-186], Table 7 and 18 Issue: Insufficient detail provided regarding monitoring for increased sediment in surface water runoff and chemical pollution. Impact: Risk of a monitoring plan not being able to detect relevant trends in water quality, if not suitably designed. Solution: Update the chemical pollution monitoring plan for surface water to provide information regarding suggested methods and quantities, such as in-situ handheld devices or samples being sent off to laboratories. Monitoring requirements for increased sediment in surface water runoff should be updated to be similar to the chemical pollution monitoring requirements. Additional Comments: It is acknowledged that surface water monitoring will be undertaken at locations on the principal watercourses downstream of the Scheme infrastructure and upstream of other non-natural influences, and the locations and parameters will be agreed with the Environment Agency prior to establishing the hydrochemical baseline.	Tables 7 and 18 of the oCEMP [APP/7.6.1] propose sampling frequencies to monitor surface water against baseline conditions. It is also stated that samples will be tested at laboratories as well as tested using in-situ devices. It should be noted that sampling locations, methodologies and sampling quantities will be confirmed with the Environment Agency before any baseline sampling or construction takes place. This is secured in the oCEMP [APP/7.6.1] and therefore the Environment Agency's sign off of parameters, locations, methodology etc will be required before sampling commences. This commitment in the oCEMP [APP/7.6.1] is a standard approach and has been implemented on the Cleve Hill Solar Farm and Mallard Pass Solar Farm DCOs.
EA49	Draft Development Consent Order ID: EA46 (Environment Agency Protective Provisions) Draft Development Consent Order [APP-018]	The Applicant notes that article 6(1)(e) of the draft DCO [APP/3.1.1] confirms that regulation 12 (requirement for environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016 does not apply in relation to the construction of any work or the carrying out of any operation required for the purposes of, or in connection with, the construction, operation, maintenance or decommissioning of any part of the authorised development, in respect of a flood risk activity only. Therefore, as is standard practice across



Reference number	Representation	Applicant response
	Consents and Agreements Position Statement [APP-185] Issue: Lack of clarity regarding why Environment Agency Protective Provisions have been included in the draft DCO when disapplication of the Environmental Permitting Regulations has not been included in the application. Impact: If disapplication is sought, further discussions will need to take place between the Environment Agency and the Applicant. Solution: Provide reasoning as to why Environment Agency Protective Provisions have been included in the draft DCO. Confirm what relevant Flood Risk Activities (if any) are proposed and confirm whether disapplication of relevant legislation applicable to these is sought. Additional Comments: The Consents and Agreements Position Statement refer to the requirements for Flood Risk Activity Permits (FRAPs) but does not indicate where these might be required. No discussions have taken place between the Environment Agency and the Applicant to date regarding FRAPs or disapplication.	numerous made solar DCOs, the Applicant has included protective provisions for the benefit of the Environment Agency in Part 5 of Schedule 15 of the draft DCO [APP/3.1.1]. The Applicant welcomes discussions with the Environment Agency regarding this disapplication. In relation to the Environment Agency's request for confirmation of the relevant Flood Risk Activities, the Applicant confirms that the only FRAP required in relation to the Scheme would be in relation to dewatering – there are no such permits required for open watercourses, as there are none within the Environment Agency's remit within the Order limits.
EA50	ID: EA47 (Requirement Wording) Draft Development Consent Order [APP-018], Schedule 2 – Requirements Issue: Numerous Requirements state that detailed management plans “must be substantially in accordance with” the outline version of the management plan. Impact: Using the term “substantially” results in a Requirement being unenforceable and is not precise. This is against government policy (National Planning Policy Framework (NPPF)) and the six tests cited in Paragraph 57 of the NPPF. Solution: The Environment Agency requests the removal of the term “substantially” from the affected Requirements, particularly those where we are/wish to be a named consultee: Requirements 6, 11, 13, 14 and 20. Additional Comments:	This Applicant does not agree with the assertion that the word “substantially” results in a requirement being unenforceable and imprecise, nor is this wording against Government policy. This phrasing, for detailed management plans to be substantially in accordance with, is extremely well-precedented across made DCOs (i.e. statutory instruments) from all industries, including all made solar DCOs. The Applicant, therefore, does not propose to depart from standard practice in this regard.
EA51	ID: EA48 (Permitted Preliminary Works) Draft Development Consent Order [APP-018], Part 1: Preliminary. Article 2 ‘Interpretation’; Schedule 2 - Requirements Issue: The definition of “permitted preliminary works” includes ‘(d) remedial work in respect of any contamination or other adverse ground conditions’, while the definition of “commence” excludes activities defined as “permitted preliminary works”, i.e. it does not include ‘remedial work in respect of any contamination or adverse ground conditions’. Impact: The CEMP secured via Requirement 13, only requires submission of a detailed CEMP prior to commencement. This means that remediation of the site could take place without the CEMP being approved or in place and therefore without the controls and mitigation commitments offered by the CEMP. Solution: We request that either ‘(d) remedial work in respect of any contamination or other adverse ground conditions’ is removed from the “permitted preliminary works” definition, or Requirement 13 is amended to include the following clause, “for the purposes of 13(1) “commence” must include ‘remedial work in respect of any contamination or adverse ground conditions’.	The Applicant does not agree with the Environment Agency's proposals on this matter. The definition of “permitted preliminary works” in article 2 of the draft DCO [APP/3.1.1], including specifically sub-paragraph (d) covering “remedial work in respect of any contamination or other adverse ground conditions” is well-precedented across made solar DCOs, including the recent East Yorkshire Solar Farm Order 2025, the Tillbridge Solar Order 2025 and the Fenwick Solar Farm Order 2026. It is therefore common practice for such remedial works to be permitted to be completed before the detailed Construction Environmental Management Plan is submitted for approval by the relevant planning authority under the corresponding requirement of those DCOs. The Applicant therefore proposes to follow this well-established precedent.



Reference number	Representation	Applicant response
	Additional Comments: If the Applicant can point to an alternative satisfactory control to the CEMP then we will consider that.	
EA52	ID: EA49 (Requirement 13 – Construction Environmental Management Plan) Draft Development Consent Order [APP-018], Schedule 2 – Requirements 13(1) Issue: The Environment Agency is not listed as a named consultee for the discharge of Requirement 13 (Construction Environmental Management Plan). Impact: Increased risk of detrimental impacts to controlled waters if the CEMP does not include sufficient mitigation. Solution: We request to be consulted on the CEMP to be approved under Requirement 13. Additional Comments:	The Applicant agrees with the Environment Agency's request and has updated the draft DCO [APP/3.1.1] at Deadline 1 to reflect this.
EA53	ID: EA50 (Requirement 14 – Operational Environmental Management Plan) Draft Development Consent Order [APP-018], Schedule 2 – Requirements 14(1) Issue: The Environment Agency is not listed as a named consultee for the discharge of Requirement 14 (Operational Environmental Management Plan). Impact: Increased risk of detrimental impacts to controlled waters if the OEMP does not include sufficient mitigation. Solution: We request to be consulted on the OEMP to be approved under Requirement 14. Additional Comments:	The Applicant agrees with the Environment Agency's request and has updated the draft DCO [APP/3.1.1] at Deadline 1 to reflect this.
EA54	ID: EA51 (Dedicated Contaminated Water Tanks) Draft Development Consent Order [APP-018] Environmental Statement Appendix 12.1: Consultation and Legislation, Planning Policy and Guidance [APP-169], Table 12-1 Environmental Statement Appendix 12.2: Flood Risk Assessment [APP-170] Issue: Item 3.8.7 of Table 12-1 (Appendix 12.1) states that the FRA "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. This is secured through a requirement of the draft DCO". However, the draft DCO refers to impermeable drainage infrastructure only in relation to the BESS Compound and does not currently commit to a specified storage capacity. Impact: There is a risk that this commitment will not be fully secured by the draft DCO, which could lead to pollution of surface water and groundwater. Solution: Update the draft DCO to clearly secure this commitment via a secured document such as the CEMP. Additional Comments:	ES Appendix 12.2: Flood Risk Assessment [AS-053] states as follows: <i>"12.4.38 Based on recommendations in NFPA 855 Standard for the Installation of Stationary Energy Storage Systems and NFCC – Grid Scale Battery Energy Storage System planning – Guidance for FRS, a burn time of 2 hours and a requirement of 1,900l/min of fire suppression water has been used to calculate the volume of fire suppressant water required to be stored onsite in the event of a container fire.</i> <i>12.4.39 This equates to 228m3 of storage.</i> <i>12.4.40 The SuDS structures serving the BESS compound will be sized to accommodate the 1% AEP +40% CC and an additional 228m3, and this will be sufficient for storing the full fire suppressant volume during an extreme rainfall event."</i> The figure of 228m3 is, as stated, based on current guidance – the relevant text in the FRA will be updated at Deadline 1 to reflect the fact that this figure is subject to change based on guidance at the time of detailed design of the Scheme. Further, the Applicant notes that the Design Principles, Parameters and Commitments [APP/5.8.1] commit, for the Customer Substation (Table 3-3) and the National Grid Substation (Table 3-4), that the related compounds will be served by a SuDS network designed to the 1% AEP event plus 40% climate change allowance. The Applicant acknowledges that a corresponding commitment is not in place for the BESS and has therefore updated this document (specifically Table 3-2) at Deadline 1 to include a commitment to storing the 1% AEP event plus an appropriate volume for firefighting water, based on guidance at the time of the detailed design of the Scheme. As such, the Applicant considers that the relevant commitment is appropriately secured.



Reference number	Representation	Applicant response
EA55	APPENDIX B – INFORMATIVES Water Supply and Demands Chapter 12 [APP-061] includes a good appraisal of water demands and potential sources of supply and provides reasonable confidence that a water supply can be found practically and sustainably. <i>With regards to HDD drilling</i> Table 12.17 in Chapter 12 [APP-061] states that the maximum total water demand for HDD drilling is given as 25.1 m³ /day. If HDD drilling uses an abstraction as a source of supply this may not be exempt from licensing as the maximum water demand is above the de minimus amount exempting an abstraction from licensing. The Applicant should ensure early engagement with the Environment Agency if there is a likely need for an abstraction licence. The Abstraction Licensing Strategy for North West Norfolk is available here: North West Norfolk Abstraction Licensing Strategy - GOV.UK.	The Applicant welcomes the Environment Agency's assessment of ES Chapter 12: Water Resources [APP-061]. With regard to the Environment Agency's comment in relation to licensing, the Applicant will engage with the EA to discuss the requirement for abstractions, following the granting of the DCO (if consented).
EA56	<i>With regards to tankering water</i> Given the initial estimates of volumes calculated, estimates of Heavy Goods Vehicles (HGV) numbers required should be factored into traffic management plans to ensure local authorities are satisfied with the increases this would mean to HGVs on local road networks. Given the heavy reliance on this source of supply, it is important that this does not pose a blocker pre-commencement.	The total anticipated water demand over the construction phase is set out within Table 12.18 (Total water demand for construction phase) of ES Chapter 12: Water Resources [APP-061]. Total HGV requirements for water tankering has been updated to be included within ES Chapter 9: Transport and Access [APP/6.2.1] and the outline CTMP [APP/7.7.1].
EA57	<i>With regards to the use of the landowners (existing) abstraction licence</i> The Applicant should be familiar with the licence intended to be used and understand what changes are required to make it suitable for purposes not already listed on the licence. If as suggested in Section 12.6.54 of Chapter 12 [APP-061], the licence intended to be used is 6/33/58/*G/0248, the Applicant should note the low quantities available on the licence (7000m³ at 24m³/day) respective to the quantities specified in the appraisal of construction water demands. Particularly if this water is continued to be used for the purpose of Livestock watering stated in the previous 2023 renewal determination.	The Applicant confirms that it is fully aware of the scope and limitations of abstraction licence *6/33/58/G/0248, including that it is currently authorised for livestock watering only and is restricted to 7,000 m³ per annum (24 m³/day) as confirmed by the 2023 renewal determination. The Applicant understands that use of the licence for construction purposes not currently authorised would require a formal licence variation, including amendment of the authorised purpose and, if necessary, abstraction quantities, to be agreed with the Environment Agency in advance. The Applicant also acknowledges that the licensed volumes are materially lower than the peak construction water demands identified in the construction water appraisal and therefore does not rely on this licence as the primary source of construction water, particularly where abstraction for livestock watering continues. Construction water demand will be met through alternative lawful supplies and demand management, with any abstraction remaining strictly within licence limits unless and until an approved variation is secured. On this basis, the Applicant is satisfied that the licensing constraints are fully understood and that there is no risk of unauthorised abstraction or environmental harm.
EA58	Embedded Operation Phase Mitigation The Embedded Operation Phase Mitigation of Chapter 12 [APP-061] does not mention the outline OEMP, outline BSMP or a Drainage Strategy. These are all essential documents that contain mitigation measures which will help protect the water environment, therefore Chapter 12 should be updated to reflect this.	Reference will be made in ES Chapter 12: Water Resources [APP-061] to the oOEMP [APP/7.8.1] and oBSMP [APP-194] at a future Deadline. The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage strategy that will serve Work Nos. 2 – 4 will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053].



4 Organisations and Businesses

4.1 AS-064, Paul Bird on behalf of Dual Harvest Agrivoltaics Limited

Reference number	Representation	Applicant response
PB1	1. Introduction and Standing This Written Representation is submitted by Paul Bird, Campaign Director of Harvesting the Sun Twice (harvestingthesuntwice.org) and Director of Dual Harvest Agrivoltaics, an independent agrivoltaics consultancy. The representation does not oppose the principle of solar energy development at the Drovers site, nor does it seek refusal of the application. Its purpose is to draw to the attention of the Examining Authority a specific technical argument: that the configuration of photovoltaic arrays proposed — conventional fixed-tilt, south-facing panels (TBPV) — is the proximate cause of the Ministry of Defence's radar and aviation safety objections, and that an alternative configuration — Vertical Bifacial Photovoltaic (VBPV) arrays — would resolve those objections structurally, by design, rather than through mitigation measures applied retrospectively. The author has over 25 years of agricultural engineering experience, including multiple patents held during a senior engineering career at Ocado Technology, and a background in Lincolnshire arable farming. Over the past 18 months he has developed a substantive evidence base on agrivoltaic system configurations and their implications for land use, grid infrastructure, and planning policy, and has engaged formally with the Department for Energy Security and Net Zero (DESNZ) on related matters (correspondence reference TOB2026/04355).	The Applicant notes this comment, the Interested Party's experience and in principle support for solar. The Applicant provides full responses to points made in the below rows.
PB2	2. Summary of Representation The Ministry of Defence has objected to the Drovers application on three grounds: • Multi-path radar interference with the precision approach radar at RAF Marham, arising from the metallic and highly reflective character of the proposed arrays; • Glint and glare hazard to pilots on approach to runway 23, and to air traffic control tower staff; and • Birdstrike risk from proposed wetland habitat creation. This representation addresses the first two grounds. It sets out that both objections are direct consequences of the proposed flat-panel (TBPV) configuration, and that adoption of a Vertical Bifacial PV (VBPV) configuration — using the same bifacial panel technology deployed	The Applicant notes this comment and is working with the MoD to address any concerns it may have arising from the Scheme, which the Applicant is confident can be achieved during the Examination. The Applicant has not repeated points already made in Examination relating to its discussions with the MoD, but provides full responses to relevant points made in Mr Bird's representation in the below rows. The Applicant has not repeated points already made in Examination relating to its discussions with the MoD. Instead, the Applicant points to Written Summary of Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [APP/8.8] and Table 3.5 in this document.



Reference number	Representation	Applicant response
	vertically in east-west orientation — eliminates both concerns by geometric design rather than by management plan. The Examining Authority is respectfully asked to require the applicant to consider VBPV configuration as part of its response to the MoD's objections, and to address the configuration question explicitly in its examination of the radar and glint/glare issues.	
PB3	3. Technical Background: TBPV and VBPV Configurations Bifacial photovoltaic panels — capable of generating electricity from both front and rear surfaces — are now the dominant panel technology in utility-scale solar development. The same bifacial panel may be deployed in two fundamentally different system configurations: Tilted Bifacial PV (TBPV) — the proposed Drovers configuration Panels are mounted on fixed-tilt racking at a low elevation angle (typically 10–35 degrees from horizontal), facing south. The panel face presents a large, near-horizontal reflective surface oriented toward the sky. This is the configuration proposed for the Drovers Solar Farm. Vertical Bifacial PV (VBPV) — the alternative configuration Panels are mounted vertically (90 degrees), facing east-west. Each row of panels acts as a fence-like structure. The panel faces are oriented perpendicular to the ground, presenting a narrow edge-on profile when viewed from most horizontal directions. Commercial-scale VBPV installations are operational across Europe, including at Frankfurt Airport — a directly analogous aviation context — developed by Next2Sun GmbH, and at multiple agricultural sites in Germany, France, and the Netherlands. Critically, VBPV uses identical panel technology to TBPV. The difference is orientation only. There is no change to the electrical generation technology, the grid connection, the BESS, or the substation infrastructure. A VBPV configuration at the Drovers site would be technically feasible and would not require a fundamental redesign of the application.	VBPV solar orientations are a relatively new concept, reported to be suitable for high latitude applications. VBPV is unproven at scale globally – the Applicant believes that the largest sole-VBPV scheme in operation has a capacity of order of magnitude approximately 100 times smaller than the Scheme. The Applicant continually reviews and assesses emerging technologies and orientations and has concluded that: (a) VBPV performance at scale in the UK is unproven. Considerable caution should be taken in transferring proposals designed for specific, smaller and in some cases uniquely-shaped land areas in other geographies to a nationally significant infrastructure scale in a UK location; and (b) that developing a VBPV at the scale required to match the grid connection capacity is not achievable in the timeframes proposed for the development of the Scheme. Therefore, VBPV was therefore not assessed as an alternative layout to the Scheme in line with NPS EN-1 (2023) paragraph 4.3.23.
PB4	4. Radar Interference: Why TBPV Creates the Problem The MoD's letter of objection states that 'the metallic content and highly reflective nature of the materials used in the construction of the arrays' will cause 'multi-path reflections of the radar's transmissions,' interfering with the precision approach radar at RAF Marham runway 23. Multi-path radar interference from solar arrays is a well-documented phenomenon. It arises when a radar signal reflects off a large, coherent, near-horizontal surface and reaches the radar receiver via a secondary path, causing false returns or signal degradation. The physics of this	The Applicant has explained in the row above why VBPV was not considered during the design phase of the Scheme. The Applicant considers that the Scheme is acceptable as currently designed and, as already noted, confirms that conversations are ongoing with the MoD to resolve any concerns they may have relating to the proposals.



Reference number	Representation	Applicant response
	mechanism are directly dependent on the geometric relationship between the radar beam, the reflective surface, and the receiver.	
PB5	Why TBPV is vulnerable A fixed-tilt south-facing array presents a large planar reflective surface at a low elevation angle — typically 10–35 degrees from horizontal. RAF Marham's precision approach radar is positioned to the west-northwest of areas within the proposed Drovers site. A TBPV array in radar line-of-sight to that radar will present a surface from which specular and near-specular reflections can redirect the radar signal along secondary paths. The MoD's objection is a direct and predictable consequence of this geometry.	The Applicant notes this comment and Table 3.5 in this document.
PB6	Why VBPV eliminates the mechanism A VBPV array presents its panel face perpendicular to the ground, oriented east and west. When viewed from the direction of RAF Marham's precision approach radar, a VBPV array presents its narrow structural edge — not its panel face. The coherent reflective surface area in the radar's line of sight is reduced by approximately 85–90% compared to an equivalent TBPV installation. The multi-path reflection mechanism the MoD describes requires a substantial, coherently-oriented reflective surface. That surface does not exist in a VBPV array oriented east-west. This is not a matter of degree — it is a structural geometric difference. VBPV does not require a radar mitigation plan because the reflective mechanism is not present in the first place.	The Applicant has explained in the rows above why VBPV was not considered during the design phase of the Scheme. The Applicant considers that the Scheme is acceptable as currently designed and, as already noted, confirms that conversations are ongoing with the MoD to resolve any concerns they may have relating to the proposals. The Applicant would further note that due to the increased height of VBPV panels, any technical mitigation solution which will be implemented for TBPV would result in a greater loss of radar coverage/impact for the VBPV layout.
PB7	5. Glint and Glare: Why TBPV Creates the Problem The MoD's objection also identifies glint and glare as a hazard to pilots on approach to runway 23, and to air traffic control staff. The objection notes that solar photovoltaic development 'close to RAF Marham has the potential to have an impact on aviation safety through glint and glare effects,' potentially 'dazzling pilots at critical stages of flight.'	The Applicant notes this comment and Table 3.5 in this document.
PB8	The geometry of glint from TBPV Glint occurs when a solar panel surface produces specular reflection directed toward an observer. For a fixed-tilt south-facing array, specular glint toward a low-elevation observer — such as a pilot on final approach — occurs at specific sun angles when the panel face, the sun, and the observer are in a geometrically defined relationship. Runway 23 at RAF Marham is oriented broadly south-southwest. An aircraft on final approach to runway 23 from the northeast will, at certain times of day, be in the glint reflection zone of south-facing panels in the Drovers	The Applicant notes this comment.



Reference number	Representation	Applicant response
	site. The MoD's concern is geometrically well-founded for a TBPV installation.	
PB9	Why VBPV cannot produce this glint geometry A VBPV panel facing east produces specular reflections in the eastern hemisphere — toward the morning sky. A VBPV panel facing west produces specular reflections in the western hemisphere — toward the afternoon sky. Neither panel face can produce specular reflection directed toward an aircraft on approach to a south-southwest runway from the northeast. The geometry is simply absent. VBPV arrays have been assessed for glint and glare in aviation contexts, including at Frankfurt Airport, and have been found to present no significant hazard — precisely because of this east-west orientation. A glint and glare management plan — as requested by the MoD — would not be required for a VBPV array because the glint mechanism toward the relevant approach paths does not exist. The developer's obligation to produce such a plan is itself an artefact of the TBPV configuration choice.	The Applicant has not conducted geometric modelling for a VBPV array at the Scheme; however, the Applicant would seek to clarify that solar reflections can be produced from vertical surfaces in general. There is no inherent quality of VBPV arrays which mean that solar reflections are impossible and the geometric relationship between the sun, reflectors and receptors are individual to any site. It is therefore not possible to state that because one installation did not produce significant solar reflections, any other site would be similarly unaffected. The Applicant is aware of concerns raised by airports in the UK regarding solar reflections from vertical surfaces in their vicinity, typically buildings with glass windows (which produce glare in a similar manner to solar PV). It is not the case that VBPV would necessarily remove the MoD's request for a Glint and Glare Management Plan, as glare may still be possible. In addition to aviation receptors, glint and glare is also assessed towards other receptors including roads and dwellings. VBPV could result in more significant effects for these receptors, considering the greater height of VBPV arrays which would increase the visibility of panels.
PB10	6. Additional Benefits of VBPV Configuration The radar and aviation safety arguments are the immediate relevance of this representation to the examination. However, the Examining Authority should be aware that VBPV configuration also offers substantive advantages in other areas relevant to this examination:	The Applicant has addressed the points raised in the rows below.
PB11	Agricultural productivity VBPV arrays, deployed in widely spaced east-west rows, allow continued arable and pastoral farming between and beneath the panels. Independent studies — including the University of York (Badran and Dhimish, 2024) and commercial operational data from Next2Sun's Welingen and Donaueschingen sites — demonstrate 70–85% retention of agricultural productivity under VBPV configuration. This directly addresses the loss of productive farmland that has been a central concern of objectors to the Drovers application.	The Applicant believes that the largest sole-VBPV scheme in operation has a capacity of order of magnitude 100 times smaller than the Scheme. The Applicant continually reviews and assesses emerging technologies and orientations and has concluded that: (a) VBPV performance at scale in the UK is unproven. Considerable caution should be taken in transferring proposals designed for specific, smaller and in some cases uniquely shaped land areas in other geographies to a nationally significant infrastructure scale in a UK location; and (b) that developing a VBPV at the scale required to match the grid connection capacity is not achievable in the timeframes proposed for the development of the Scheme. Therefore, VBPV was therefore not assessed as an alternative layout to the Scheme in line with NPS EN-1 (2023) paragraph 4.3.23. Solar farms in configurations other than VBPV do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. By example, the land under and around the panels will be managed throughout the operational phase by a combination of management techniques including grazing with sheep (as described in ES Chapter 11: Soils and Agriculture [AS-018]), as secured in the oOEMP [APP/7.8.1].
PB12	Grid alignment and BESS reduction VBPV's east-west orientation produces a dual morning and evening generation peak, closely aligned with grid demand. The midday generation peak characteristic of south-facing TBPV arrays creates a structural mismatch with grid demand that requires large-scale battery energy storage (BESS) to be commercially	The BESS has been proposed as associated development to support the operation of the Scheme. Section 4.6 of the Statement of Need [APP-042] explains that the balance between supply and demand on the GB electricity system is changing and is expected to continue to change as both supply and consumption change and grow. It is therefore not a given, as this representation states, that grid demand peaks will always occur at times when VBPV technology generation is highest. The inclusion of BESS as part of the Scheme will allow energy to be stored at times that it is not needed, and



Reference number	Representation	Applicant response
	manageable. VBPV configuration reduces BESS requirements by approximately 50%, with consequent reductions in capital cost, land take, and embedded carbon.	released at times when it is needed more. The BESS has been proposed at a scale which is appropriate for the Scheme while respecting local environmental considerations.
PB13	Landscape and visual impact VBPV arrays have a lower visual mass than TBPV installations of equivalent capacity. The fence-like structure of VBPV rows, with open ground between, is materially less intrusive in an open agricultural landscape than the dense, continuous panel coverage of conventional TBPV deployment.	The height of the solar PV panels for the Scheme has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in ES Chapter 5: The Scheme [APP/6.1.2] and the Design Principles, Parameters and Commitments [APP/5.8.1]. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. With regard to potential visual intrusion of proposed Solar PV Arrays, the ES Chapter 6: Landscape and Visual [AS-016] and accompanying visualisations have accounted for the worst-case scenario with regard to consideration of the height of different types of Solar PV Arrays. With regard to Solar PV Array type, the potential landscape and visual effects detailed within ES Chapter 6: Landscape and Visual [AS-016] considers a worst-case scenario, i.e. the 'tallest' maximum design parameters (i.e. the 4.5m tracker panels) of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.
PB14	7. Request to the Examining Authority The Examining Authority is respectfully asked to: 1. Require the applicant to address, in its response to the MoD's radar and glint/glare objections, whether VBPV configuration has been assessed as an alternative to TBPV, and if so, to provide the basis for any conclusion that VBPV would not resolve the MoD's concerns; 2. Note that the MoD's objection is a configuration-specific objection, not a technology-specific objection, and that the examination of mitigation measures should include consideration of configuration change as a primary mitigation option; and 3. Consider whether a condition or requirement addressing panel orientation — specifically the option of VBPV configuration for those array sections in radar line-of-sight to RAF Marham's precision approach radar — would be appropriate in the event that consent is granted.	The Applicant has addressed these matters in the above responses.
PB15	8. Offer of Further Evidence The author is willing to provide further written or oral evidence to the examination on any of the technical matters raised in this representation. A substantial evidence base on VBPV system performance, agricultural compatibility, radar cross-section characteristics, and commercial deployment examples is available and can be provided in any format useful to the Examining Authority. Contact details are provided on the title page of this document. The	The Applicant welcomes the Interested Party to make further representations as the Examination of the DCO Application progresses.



Reference number	Representation	Applicant response
	campaign's public evidence library is available at harvestingthesuntwice.org.	



4.2 RR-015, CPRE Norfolk

Reference number	Representation	Applicant response
CPRE1	Dear Madam or Sir, We are writing to you to register to have our say in the examination of the NSIP proposal 'The Drove Solar Farm'. CPRE Norfolk supports the transition to renewable energy and recognises the urgent need to decarbonise electricity generation. However, this support is not unconditional. Renewable energy developments must be appropriately sited and designed to avoid unacceptable harm to the countryside, landscape character, agricultural land, and rural communities.	NPS EN-1 (2023) states, at paragraph 2.3.3, that the Government's policy objectives for the energy system are <i>"to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050"</i>. The 2025 NPS maintains the same wording also at paragraph 2.3.3, which further supports our position as the policy has remained consistent in this regard. Meeting this objective will require a rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure, per paragraph 2.3.5 of NPS EN-1 (2025). NPS EN-3 (2025) states, at paragraph 2.10.2, that <i>"Solar energy is at the heart of our Clean Power 2030 Mission"</i> and at paragraph 2.10.5 that <i>"Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation"</i>. The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects such as the Scheme, and that large-scale projects are needed to meet Government's aim for a clean power system from 2030. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme. The Planning Statement [APP/5.5.1] sets out the rigorous process that the Applicant undertook to select the Site including the consideration of environmental constraints. This is detailed within Appendix 1: Site Evaluation Report to the Planning Statement [APP/5.5.1]. The Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors, including consideration of designated international and national ecological and geological sites, nationally designated landscapes, ancient woodland, flooding and heritage and archaeological. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] and Planning Statement [APP/5.5.1] Appendix 1 Site Evaluation Report explains the methodology that has been applied when identifying and evaluating potential sites for the Scheme.
CPRE2	In our view, the proposed Drove Solar Farm fails to meet these requirements. The National Planning Policy Framework (NPPF) requires planning decisions to contribute to and enhance the natural and local environment, including by protecting valued landscapes and recognising the intrinsic character and beauty of the countryside.	The Applicant respectfully disagrees. Table 4 of the Policy Compliance Document [APP/5.6.1] details that the Scheme is compliant with the relevant policy tests, as contained within the NPPF.
CPRE3	While the NPPF supports renewable energy development, it also makes clear that proposals should be acceptable in planning terms and not result in unacceptable impacts. The scale and siting of the Drove Solar Farm would result in significant harm to the open rural character of this part of Norfolk, contrary to these core principles. The proposal would introduce an industrial-scale development into an open agricultural landscape, fundamentally altering its character.	It should be noted that the NPSs for Energy (the 2023 versions of NPS EN-1, NPS EN-3 and NPS EN-5) are the principal policy documents on which the Secretary of State is to determine the DCO Application. Tables 1 to 3 of the Policy Compliance Document [APP/5.6.1] detail that the Scheme is compliant with the relevant policy tests within these NPSs, as well as the recently adopted 2025 NPSs. It should be noted that paragraph 5.10.5 of NPS EN-1 (2023) recognises that <i>"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape"</i>. As noted within section 8.3 of the Planning Statement [APP/5.5.1], fulfilling the requirement for good design whilst demonstrating full adherence to the mitigation hierarchy has been of paramount importance. The Scheme's design and evolution have placed ongoing consideration for landscape and visual matters. With regard for the NPPF, the Applicant considers, through Table 4 of the Policy Compliance Document [APP/5.6.1], that the Scheme is compliant with the relevant NPPF policy tests. The NPPF is considered to be both an important and relevant matter to the Secretary of State's decision (see Section 104 (2)(d) of the Planning Act 2008). ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon



Reference number	Representation	Applicant response
		visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. Mitigation measures are embedded within the Scheme to limit potentially adverse effects upon the landscape and these are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.5 "<i>respect setting of heritage assets along the Nar Valley</i>", 2.8 "<i>consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane</i>" and 2.9 "<i>consider experience of people using the PRoW</i>". Mitigation measure include: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRoW, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRoW by a minimum of 15m, to respect the amenity and experience for PRoW users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site and this would enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRoW network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRoW network within the study area to provide recreational benefits.



Reference number	Representation	Applicant response
CPRE4	CPRE Norfolk is particularly concerned about the cumulative impact of large solar installations across rural Norfolk, which risks the industrialisation of the countryside. The submitted information does not, in our view, demonstrate that landscape and visual impacts have been adequately avoided or minimised, as required by both national policy and good planning practice.	The assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and the Planning Inspectorate's advice note on Cumulative Effects Assessment. The approach to cumulative assessment is detailed in ES Chapter 2: EIA Process and Methodology [APP-051] and ES Appendix 2.4: Cumulative Schemes [APP-136]. • ES Chapter 6: Landscape and Visual [AS-016] includes an assessment of likely cumulative effects and concludes the following significant residual adverse effects: E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the Scheme with High Grove Solar; and • VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the Scheme with High Grove Solar. With regard to national policy, NPPF paragraph 187, the “<i>intrinsic character and beauty of the countryside</i>” is recognised in ES Chapter 6: ES Landscape and Visual [AS-016], supporting ES Appendix 6.5 Evaluation of Landscape Value [APP-143] and ES Appendix 6.6: Extracts from Relevant Landscape Character Assessments [APP-144].
CPRE5	Screening and mitigation cannot fully address the long-term change in land use and character that this development would introduce. CPRE Norfolk has longstanding concerns about the loss of agricultural land to large-scale solar development. The NPPF seeks to protect the best and most versatile agricultural land (Grades 1, 2 and 3a). Where such land is affected, applicants are expected to demonstrate that poorer quality land is unavailable and that the development is necessary in that location. We are not satisfied that the application robustly justifies the use of productive agricultural land, nor that alternative locations—such as previously developed land, commercial rooftops, car parks, or less sensitive sites—have been properly explored.	Agricultural land quality was a key consideration in the Applicant's site selection process. As set out in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053], the Applicant has sought to identify non-BMV agricultural land in its site selection for the Scheme. Paragraph 187(b) of the NPPF recognises the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. Paragraph 2.10.21 of NPS EN-3 (2023) recognises the preference for poorer quality land, but allows significant weight to be given to the benefits of renewable energy, even where BMV land is affected. The Policy Compliance Document [APP/5.6.1] demonstrates the Scheme's compliance with the NPPF and the relevant NPS policy tests on the use of best and most versatile agricultural land. With regard for alternatives, the Applicant points to the response provided below to CPRE6.
CPRE6	CPRE has consistently advocated a “rooftops first” approach to solar deployment. Large-scale ground-mounted solar should not be treated as the default option where less harmful alternatives exist. The application fails to demonstrate that a sequential approach to site selection has been applied, contrary to the principle of sustainable development. The proposal is inconsistent with the objectives of local planning policy, which seek to protect Norfolk's distinctive landscapes, support sustainable rural communities, and direct inappropriate development away from the open countryside.	The Applicant supports the development of rooftop solar but alongside, not instead of, large-scale ground mount schemes. This is because, on their own, rooftop schemes will not deliver the required growth in new capacity to the required timelines to support the pace of carbon reduction required to hit the UK's legal targets. Section 6.3 of the Statement of Need [APP-042] provides further detail. The development of both rooftop and ground mount solar is supported in national policy at paragraph 3.3.12 of NPS EN-1 (2023 and 2025) which explains that the Government does not believe small-scale schemes, which include rooftop schemes, will replace the need for new large-scale electricity infrastructure to meet the Government's energy objectives. Section 2.10 of the Statement of Need [APP-042] explains that the Government's Solar Roadmap (2025) describes that under the Government's current energy policy scenario, 60-65% of solar capacity installed by 2030 could be large-scale projects, further supporting the need for capacity growth in both rooftop and large-scale ground mount schemes. The Applicant notes that rooftop solar is not included in the Government's Clean Power capacity ranges, further supporting the Government's view (with which the Applicant agrees) that rooftop solar is needed alongside rather than instead of large-scale schemes. The reasons for this have been stated above and are explained further in the Statement of Need [APP-042]. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] 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/5.5.1] 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.



Reference number	Representation	Applicant response
		Tables 5 and 6 of the Policy Compliance Document [APP/5.6.1] provide an assessment of the Scheme's compliance with the relevant local policy tests. These tables conclude that the Scheme is compliant with relevant local policy tests.
CPRE7	For the reasons set out above, CPRE Norfolk considers that the Drove Solar Farm would result in unnecessary and avoidable harm to the Norfolk countryside and is not justified by planning policy. We therefore urge the Local Planning Authority to refuse planning permission for this application.	The Applicant respectfully disagrees and points to the planning balance the Applicant has applied in the Planning Statement [APP/5.5.1] which considers that the identified substantial benefits of the Scheme outweigh the residual harms that would arise. The DCO Application will be examined by the Examining Authority (as appointed by the Secretary of State) who will, on the close of the Examination, produce a recommendation report for the relevant Secretary of State who is to determine the Scheme. The local planning authority (being the host authorities) are not the decision takers in this process.



4.3 RR-056, Swaffham Climate and Environment group

Reference number	Representation	Applicant response
SCE1	SCEG supports the development but with reservations. In terms of comments, we have the following – SCEG supports ‘measures and actions to promote biodiversity and create a healthy carbon free environment in the Swaffham area’. This development fits in with our group aims hence our support but with reservations. Given the above, we have the following issues/reservations that we ask are addressed if the application proceeds	The Applicant welcomes the support of Swaffham Climate and Environment Group for the Scheme and has addressed the reservations in turn below.
SCE2	We are concerned about the scale of the solar farm development particularly in combination with the High Grove development proposals by RWE 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.	NPS EN-1 (2025) states, at paragraph 2.3.3, that the Government’s policy objectives for the energy system are “to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050”. Paragraph 2.3.5 of NPS EN-1 (2025) explains that these objectives will be met through a “rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure,” consistent with the Clean Power Action Plan. NPS EN-3 (2025) states, at paragraph 2.10.2, that “solar energy is at the heart of [the government’s] Clean Power 2030 Mission”. The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects, such as the Scheme, to meet the Government’s aim for a clean power system from 2030. The Statement of Need [APP-042] also explains that the proposed location for the Scheme is appropriate for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in timeframes compatible with the Government’s aims, coupled with sufficient solar irradiance, and a suitable area of secured land for the proposed solar and BESS. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward that the Applicant is bringing forward the Scheme at the scale and location proposed. The Applicant acknowledges that there are cumulative impacts from the Scheme and that these are set out in each of the ES topic chapters and are summarised in ES Chapter 18: Summary of Effects [APP-067]. ES Appendix 2.4: Cumulative Schemes [APP-136] presents the schemes considered for assessment as part of the cumulative effects assessment within the ES. Table 2-3 of the appendix contains the details of the selected schemes and High Grove Solar (EN0110010) is the first listed scheme. High Grove Solar has been considered, as appropriate, in each of the topic chapters of the ES. The length of the High Grove Solar construction period is stated in its PEIR as 2.5 years, and the project has a grid connection starting in October 2031, as per the NESO Transmission Entry Capacity register. As detailed in paragraph 5.4.1 of ES Chapter 5: The Scheme [APP/6.1.2], the earliest time that the construction phase for the Scheme would begin is Q3 2031. In the context of the information known about the High Grove Solar construction period, and the construction phase for the Scheme, it is unlikely that the construction periods would overlap and result in potential cumulative construction effects. In addition, Section 5.15 of the oCTMP [APP/7.7.1] includes a commitment that, although “the construction for the High Grove Solar Farm project is due to finish before commencement of the Scheme [...] If the construction periods for the respective schemes overlap, a joint CTMP could be produced. This will set out construction traffic management and control measures relevant to those areas where the construction vehicle routes for the respective schemes overlap, to reduce and manage any potential cumulative effects”.
SCE3	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	Mitigation measures have been embedded within the Scheme to limit potentially adverse effects upon the landscape and visual amenity, including measures to respond to the impacts on the Peddars Way and Norfolk Coast Path. Such measures include offsets to new development areas from the Peddars Way and Norfolk Coast Path, retention of existing landscape features within the Order limits and also extensive new hedgerow, tree and woodland planting throughout the



Reference number	Representation	Applicant response
	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.	Site – all of which are secured across the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principal 2 and more specifically Project Principles 2.1: “respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment”, 2.5: “respect setting of heritage assets along the Nar Valley”, and 2.9: “consider experience of people using the PRoW”. Potential visual effects of the Scheme on PRoW users of the Peddars Way and Norfolk Coast Path are assessed within ES Chapter 6: Landscape and Visual [APP/6.2.2] with reference to viewpoint locations, supporting photography and visualisations (viewpoints 8, 12 and 14) situated along the Peddars Way and Norfolk Coast Path and also within Castle Acre. Please refer to ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088], as well as ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. The Site is situated within National Character Area 85: The Brecks which was identified within the baseline assessment. Due to the scale of the regional character area and the presence of more detailed character areas at a local level, effects on this regional character area are not assessed within this LVIA. This regional character area has been scoped out from a detailed assessment as agreed with PINS in ES Appendix 2.2: Scoping Opinion Response [APP-134]. The proposed landscape mitigation measures and design of the Scheme consider the key characteristics of the National Character Area 85. In particular, the Scheme proposes two areas of new native woodland blocks, detailed within the oLEMP [APP/7.11.1], which are characteristic in species and shape, aligning with the existing published key characteristic by Natural England, referencing “the regular geometric shape and form and the repeated occurrence of plantations and shelterbelts”.
SCE4	The need to assess the possible issue of dazzle to road users	Glint and glare impacts upon road users are assessed within ES Chapter 16: Other Environmental Matters [APP-065] and ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176]. No significant impacts are predicted following mitigation, including advanced planting along the Site boundary with the A1065.
SCE5	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. As regards the cable corridor it is located through a sensitive environmental area of the Nar valley and the utmost care should be taken to ensure the area is not degraded and the biodiversity is preserved and enhanced wherever possible.	The Applicant notes that the Scheme seeks to protect the existing sensitive ecological receptors in the Site through careful design of the Scheme and provision of a number of mitigation measures secured via the various control documents submitted with the DCO Application. In addition, the Scheme will deliver a BNG well in excess of 10%, as set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], and will provide a number of flora and faunal enhancement measures (oLEMP [APP/7.11.1]), together resulting in a betterment for biodiversity as a result of the Scheme. The Applicant also notes that the draft DCO [APP/3.1.1], at Requirement 9 of Schedule 2, ensures that “no part of the authorised development may commence until a biodiversity net gain strategy [which must contain details of how the minimum 10% BNG is secured] has been submitted to and approved by the relevant planning authority for that part in consultation with the relevant statutory nature conservation body”. Impacts of the Scheme on Priority Habitats and Priority Species have been fully considered within Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. Embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse (oCEMP [APP/7.6.1]), and ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects



Reference number	Representation	Applicant response
SCE6	Glnt and glares – concern that road users are not unduly affected by glint and glare and that, as far as possible, panels are screened for property owners and public rights of way users.	Glnt and glare impacts upon road users are assessed within ES Chapter 16: Other Environmental Matters [APP-065] and ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176]. Screening has been proposed for road receptors with potential for significant glare impacts, including advance planting along a 2.2km section of the A1065, in order to mitigate impacts upon road users, as secured in the oCEMP [APP/7.6.1]. Following this mitigation, no significant residual impacts are predicted towards road users. For residential properties, a low impact is predicted towards two dwellings and solar reflections may be possible with partial screening reducing the significance. For all other receptors, no solar reflections are predicted to be visible in practice. No significant impacts are predicted upon residential amenity. PRoW have been assessed at a high level and no significant impacts are predicted due to the sensitivity of the receptors. It is considered that there would be no potential for significant safety or amenity impacts.
SCE7	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.	Assessed landscape and visual effects are detailed within ES Chapter 6: Landscape and Visual [APP/6.2.2], which outlines potential landscape and visual impacts upon receptors, such as visual receptors along the Peddars Way and Norfolk Coast Path and within Castle Acre and the Nar Valley. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.5 “<i>respect setting of heritage assets along the Nar Valley</i>”, 2.8 “<i>consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane</i>” and 2.9 “<i>consider experience of people using the PRoW</i>”. Mitigation measures include: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are



Reference number	Representation	Applicant response
		primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits.
SCE8	Socio economics – the maximum local employment is engaged. The public have an opportunity to be advised at meetings/tours to be acquainted with the project and when it is up and running (on the assumption that the project proceeds).	The Applicant is committed to supporting local jobs and maximising opportunities for local businesses to participate in the delivery of the Scheme, consistent with the principles of Norfolk's NSIP Employment and Skills Framework. As outlined in section 8.5 of the oESSCS [APP-195], engagement will focus on identifying and assisting local contractors and suppliers to access project-related opportunities, including through engagement, market awareness activities, and collaboration with local business networks. The Applicant will also ensure that job openings and subcontracting opportunities are advertised through appropriate local channels or platforms to maximise visibility and accessibility for local SMEs. These commitments will be developed further in the detailed Employment, Skills and Supply Chain Strategy, following continued engagement with NCC and local partners.
SCE9	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 part of the scheme as is 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.	The comments about the potential for agrivoltaics are noted. The Scheme will involve Ground Mounted PV Modules, as described in the ES Chapter 11: Soils and Agriculture [AS-018], which will allow for grazing under and around the panels. Sheep grazing is the most common grazing management, but other grazing livestock are not precluded. The implications for food production and the agricultural economy are set out in ES Chapter 11: Soils and Agriculture [AS-018], notably in sections 11.8 and 11.11. Solar farms do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. They do, however, limit opportunities for arable farming uses. The potential effects on food production locally and nationally have been assessed in ES Chapter 11: Soils and Agriculture [AS-018]. There is no policy that requires agricultural land to be farmed for food production. As noted in paragraph 11.8.100, as of 1 June 2025 some 444,000 ha of arable land in the UK was in agri-environmental land use (i.e. funded for non-production uses). The Organisation for Economic Co-operation and Development and the Food Agriculture Organisation's (OECD-FAO) joint study does not predict a worldwide shortage of food over the next 10 years, as stated in paragraph 11.8.102 of ES Chapter 11: Soils and Agriculture [AS-018], nor does the UK Government. The biggest threat to food security is considered to be crop failure due to climate change, the Solar Roadmap advises, which solar farms are helping to tackle. There will be impacts on the wider rural economy resulting from the change from the current farming practices, but there will also be benefits. The management of sheep involves more labour per hectare than most arable cropping, and offers economic benefits for other parts of the wider rural economy. The impacts should, therefore, be considered in context. Currently, approximately 11% of arable land is not in production but is funded under agri-environmental land management schemes (444,000 ha). Overall, ES Chapter 11: Soils and Agriculture [AS-018] concludes that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production.



Reference number	Representation	Applicant response
		Section 11.11 of ES Chapter 11: Soils and Agriculture [AS-018] considers the cumulative effects with other large-scale solar proposals and concludes that the cumulative effect is also small, around 1% of farmed land in Norfolk.
SCE10	Cumulative effects – this is the close proximity of very major schemes north of Swaffham ie. High Grove and the Drovers. Biodiversity – this is a key consideration for SCEG and we urge that everything is done to ensure existing habitats and biodiversity is carefully protected during development and enhanced as required by the 10% + BNG requirements. We urge that the applicant goes above and beyond in boosting biodiversity. Existing mammal/bird/reptile movement routes eg. Badgers, bats, hares, hedgehogs, etc should be maintained during and after construction along with hedgerows and other features that support biodiversity. 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. Recognised ecological monitoring should be undertaken and reported upon publicly over the lifetime of the development.	A full assessment of cumulative effects on designated sites, priority habitats and priority species has been undertaken within the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that no potential cumulative adverse effects are anticipated as a result of the Scheme in-combination with any of the identified cumulative schemes. The Scheme delivers a BNG well in excess of 10%, as set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], 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 draft DCO [APP/3.1.1], at Requirement 9 of Schedule 2, ensures that “<i>no part of the authorised development may commence until a biodiversity net gain strategy [which must contain details of how the minimum 10% BNG is secured] has been submitted to and approved by the relevant planning authority for that part in consultation with the relevant statutory nature conservation body</i>”. The Design Principles, Parameters and Commitments [APP/5.8.1] seek to retain and enhance connectivity of habitat (through hedgerow planting, for example) to facilitate faunal movement throughout the Site during the construction, operation, maintenance and decommissioning phases of the Scheme as secured in the oLEMP [APP/7.11.1]. NGOs, for example the Norfolk Wildlife Trust (NWT), have been actively engaged during the application process and will continue to be engaged during the examination of the DCO Application and where appropriate to inform ongoing management and monitoring of ecological resources during the life of the Scheme. The oLEMP [APP/7.11.1] will be updated at Deadline 1 to confirm this commitment, with detailed measures further anticipated within the detailed Landscape and Ecological Management Plan. In particular, the Applicant would be pleased to work with NWT to establish where specific reintroduction of Breckland plants and biota may be possible as part of the detailed Landscape and Ecological Management Plan, along with monitoring protocols for these and other species, along with the appropriate outcomes and reporting. As mentioned above, the habitats within the Site will be managed throughout the operation phase as secured in the oLEMP [APP/7.11.1]. Information in regard to detailed management actions, timings and monitoring will be provided within the detailed Landscape and Ecological Management Plan, including in relation to the above commitments, as secured through Requirement 7 in Schedule 2 to the draft DCO [APP/3.1.1]. Further, detailed measures and monitoring requirements (including management actions, timings and monitoring methodologies) will be reviewed during the operational process (for example to take into account changes in the fauna present and reflect any future colonisation or remediation measures that may occur). In addition, specific habitat monitoring and remedial measures (where necessary) will be required as part of the BNG commitments, including within the detailed Landscape and Ecological Management Plan, as secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.1]. After the decommissioning phase, the landowner(s) 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. The Biodiversity Net Gain Assessment Report [APP/7.4.1] has been updated to take into account the published Norfolk LNRS (Countywide Nature Recovery Strategy) at Deadline 1.
SCE11	Climate change – the panels have an opportunity to create a microclimate which can be exploited for natural biodiversity gain. The development shall be climate change neutral from the perspective of construction and sourcing of materials. Obviously we fully support the need to transition to net zero technology.	The Applicant welcomes these comments recognising the importance of renewable energy and the role it can play in supporting the transition to a low-carbon energy system. The GHG assessment presented in ES Chapter 13: Climate Change [APP/6.2.2] concludes that while there will be GHG emissions associated with the construction, operation, maintenance and decommissioning phases of the Scheme, these are outweighed over time by the carbon savings achieved by the operational emissions savings arising from the renewable



Reference number	Representation	Applicant response
		electricity generation and the Scheme's role in the grid decarbonisation. As the Scheme will result in net GHG savings over its lifespan, it is considered the Scheme is beneficial.
SCE12	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.	Cultural heritage and archaeology have been carefully considered as part of the Scheme as detailed within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] which presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein along with potential impacts of the Scheme upon the historic environment. With mitigation measures in place no significant effects upon cultural heritage and archaeology have been identified. The Applicant is committed to delivering a Community Benefit Fund in relation to the Scheme, should development consent be granted. The Applicant considers this to be an appropriate and proportionate way of providing a direct benefit to the local community – community benefits have been consulted on throughout the pre-application process, and ongoing discussions will inform how funding is best distributed within the community.
SCE13	Other - the RSPB and others have ascertained that solar farms offer an outstanding opportunity to benefit biodiversity and it is crucial that the minimum disturbance occurs during the construction phase, that the entire area is positively managed on an ongoing basis during the operational phase and biodiversity is preserved over the lifetime of the development and safeguarded during and after decommissioning.	The Applicant notes this comment. To ensure that sensitive ecological receptors are protected during the construction of the Scheme, measures to be adhered to are set out within the oCEMP [APP/7.6.1]. These include, but are not limited to, measures to control noise, light, and pollution. An oLEMP [APP/7.11.1], detailing habitat creation, monitoring and management measures, is provided as part of the DCO Application; these measures will become secured through the detailed Landscape and Ecological Management Plan via a requirement of the DCO. As noted elsewhere, the habitat creation results in the Scheme delivering a BNG well in excess of 10%, as set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme. Created habitats will be retained for the duration of the operation of the Scheme (to be set out within the detailed Landscape and Ecological Management Plan as secured through Requirement 7 in Schedule 2 to the draft DCO [APP/3.1.1]), with the relevant land returning to the landowner after decommissioning Habitat protection measures, such as tree protection fencing and surface water controls, during decommissioning are secured within the oDS [APP/7.10.1] and will also be provided within the subsequent detailed Decommissioning Strategy secured via a requirement of the DCO.
SCE14	Additional on-site community benefits The ability of the public to gain reasonable access for site tours, etc.	The Applicant has committed to providing 3.5km of new permissive paths and an area identified for publicly accessible amenity space at the edge of the plateau. The oPRoWPPMP [APP-192] makes reference, at paragraph 1.5.9, to the length of permissive paths proposed within the Order limits, and the Green Infrastructure Strategy Plans (Appendix 1 of the oLEMP [APP/7.11.1]) show the indicative routing of the permissive paths. In accordance with Design Principles 2.6 and 5.7, the Scheme would be designed to provide education and interpretation of the Site, as secured within the oLEMP [APP/7.11.1]. This will include the provision of informal, lowkey 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, alongside the Site's ecology. Information will also be provided on the solar farm, climate change and the benefits of renewable energy. The oESSCS [APP-195] commits the Applicant to explore opportunities to work with schools, colleges and local authorities to deliver outreach programmes on renewable energy and STEM careers, including talks, curriculum-linked workshops, and participation in existing initiatives such as the Breckland Skills Assembly and the King's Lynn & West Norfolk and Breckland Boost Programmes. Site visits during the construction period and during the Scheme's operational lifetime may be explored by the Applicant as a useful tool to educate and inspire students. As such, the Applicant will consider how best to provide a physical space or meeting point within the Scheme to deliver STEM initiatives to local groups and schools. People using this space could then gather and learn about the solar farm and renewable energy, making the Scheme an educational resource for the local area.



Reference number	Representation	Applicant response
SCE15	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.	The Applicant confirms that local wildlife stakeholders, including NWT have been engaged throughout the pre-application process on design and management measures and future collaboration to ensure community benefits, including individual meetings outside of written consultation, as set out within the ES Appendix 7.1: Consultation and Legislation, Planning Policy and Guidance [APP/6.4.1] , and will continue to be engaged with throughout, and subsequent to, the examination of the DCO Application.
SCE16	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. Cycling routes could be established as gravel tracks as part of the visitor offer.	The Applicant has committed to retaining the alignment of existing PRoW within the Site and to provide 3.5km of new permissive paths that will contribute to the wider network of footpaths and bridleways in the area and facilitate greater public access to the countryside. The Scheme also includes an area identified for publicly accessible amenity space at the edge of the plateau. The permissive paths will be designed to ensure that they are safe and accessible for walkers, cyclists, and other non-motorised users. It is not intended to gravel the paths, so that the grassy margins along hedgerows are retained. The oPRoWPPMP [APP-192] provides the details of the permissive paths proposed within the Order limits, and the Green Infrastructure Strategy Plans (Appendix 1 of the oLEMP [APP/7.11.1]) show the indicative routing of the permissive paths. In accordance with Design Principles 2.6 and 5.7, the Scheme has been designed to provide education and interpretation of the solar farm site as set out within the oLEMP [APP/7.11.1]. This includes the provision of informal, lowkey interpretation boards at appropriate points across the Order limits to aid wayfinding and 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 Scheme, climate change and the benefits of renewable energy.
SCE17	Community benefit fund An ongoing community fund that organisations and groups can bid to – often fairly limited amounts of money can be of benefit to them. Possible reduction of energy costs to those adversely affected by the development. Pride in being a green energy hub	The Applicant is committed to delivering a Community Benefit Fund in relation to the Scheme, should development consent be granted. The Applicant considers this to be an appropriate and proportionate way of providing a direct benefit to the local community – community benefits have been consulted on throughout the pre-application process, and ongoing discussions will inform how funding is best distributed within the community. A local foundation will likely independently determine the local initiatives to provide services to the community that are chosen to benefit from the Community Benefit Fund. There are no current plans to provide subsidised energy or rebates to the local community directly as a result of the Scheme – the Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process).
SCE18	Further comments 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.	The Applicant is fully committed to ongoing, trustful engagement with the community and affected persons during the lifetime of the Scheme. The Applicant is committed to delivering a Community Benefit Fund in relation to the Scheme, should development consent be granted. The Applicant considers this to be an appropriate and proportionate way of providing a direct benefit to the local community – community benefits have been consulted on throughout the pre-application process, and ongoing discussions will inform how funding is best distributed within the community. A local foundation will likely independently determine the local initiatives to provide services to the community that are chosen to benefit from the Community Benefit Fund. The administration of the community benefit fund is to take place throughout the operation of the Scheme, and IGP are committed to ensuring any relationships built within the community are maintained throughout the lifetime of the Scheme.





4.4 RR-045, Norfolk Wildlife Trust

Reference number	Representation	Applicant response
NWT1	The Drovers Solar Farm Project Ref: EN0110013 Norfolk Wildlife Trust (NWT, Registered charity no. 208734) has more than 40,000 members and is dedicated to the conservation of wildlife and restoration of the natural environment in Norfolk. We recognise the need for renewable electricity to facilitate the transition to low-carbon electricity generation and supply in the UK. Our interest in the Drovers Solar Farm project that is the subject of this DCO application ('the Project') relates to its impacts on wildlife and ecology in Norfolk, both in terms of existing wildlife and ecological features and the potential ecological enhancements to make a meaningful contribution to nature recovery.	The Applicant notes this comment and welcomes the engagement from NWT received to date.
NWT2	Norfolk Wildlife Trust has engaged with the Island Green Power Project Team, and their ecological consultants, regarding the Project as part of the pre-application process. Our comments below detail areas of interest and concern and will be the focus of our representations and engagement as part of the DCO application process. We note though that new information may come to light during the Examination process and reserve the right to comment on additional matters to those detailed below should this be necessary to support our goal of securing the best possible outcomes for wildlife and biodiversity.	The Applicant notes this comment, confirms the engagement referenced and welcomes future engagement from NWT during the examination of the DCO Application.
NWT3	Norfolk Wildlife Trust supports solar energy development in principle, recognising its importance in meeting the UK Government's commitments on energy security and net zero carbon emissions by 2050. However, our support for The Drovers Solar Farm is qualified. The Project must be designed, constructed, operated and decommissioned in a way that: • Avoids harm to designated sites, priority habitats and protected species. • Delivers ambitious biodiversity net gain, exceeding the statutory minimum. • Contributes meaningfully to nature recovery and ecological connectivity at a landscape scale; and • Provides genuine and lasting benefits to local communities.	A full assessment of direct and indirect effects on designated sites, priority habitats and priority species, has been undertaken within section 7.8 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], including considerations with regard to air quality and water pollution. The assessment has taken into account the associated mitigation and design measures proposed, for example habitat and faunal buffers, pollution prevention measures, and transport route design, in order to avoid significant harm to designations, priority habitats and priority species and ensure the proposals result in negligible, not significant effects. The Design Principles, Parameters and Commitments [APP/5.8.1] 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 as secured in the oLEMP [APP/7.11.1]. New habitat creation will include grassland, scrub, and attenuation features. The Scheme will deliver a BNG well in excess of 10%, as set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1] 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 draft DCO [APP/3.1.1], at Requirement 9 of Schedule 2, ensures that "<i>no part of the authorised development may commence until a biodiversity net gain strategy [which must contain details of how the minimum 10% BNG is secured] has been submitted to and approved by the relevant planning authority for that part in consultation with the relevant statutory nature conservation body</i>". The Applicant is committed to ensuring that communities benefit from the Scheme. As set out in the Planning Statement [APP/5.5.1], the Applicant has committed to providing a Community Benefit Fund. 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 Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process).



Reference number	Representation	Applicant response
NWT4	At present, NWT considers that further information and design refinement are required before the Project can be considered acceptable in ecological and environmental terms. Our focus during the Examination will be on securing comprehensive mitigation and compensation for potential impacts.	The Applicant notes this comment and welcomes future engagement from NWT during the examination of the DCO Application. Consideration of the further information and design refinements raised by NWT are responded to individually below in response to comments NWT5 - NWT16.
NWT5	General Concerns and Comments Norfolk Wildlife Trust seek assurances that a strict adherence to the Mitigation Hierarchy will be followed, including evidence that impacts are being avoided and enhancement is being delivered. Where mitigation, compensation, and enhancement are delivered – be it for Biodiversity Net Gain, landscape, or for targeted species – we seek to ensure the best possible outcomes for biodiversity.	The mitigation hierarchy is central to the design process of the Scheme (Design Principles, Parameters and Commitments [APP/5.8.1]), and has been informed by specific survey work, including desk study set out within the ES Appendix 7.2: Baseline Ecological Survey Report [APP-148], and assessed separately, in full, within section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2]. The Scheme will deliver a BNG well in excess of 10%, as set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1] 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 draft DCO [APP/3.1.1], at Requirement 9 of Schedule 2, ensures that “<i>no part of the authorised development may commence until a biodiversity net gain strategy [which must contain details of how the minimum 10% BNG is secured] has been submitted to and approved by the relevant planning authority for that part in consultation with the relevant statutory nature conservation body</i>”.
NWT6	Biodiversity Net Gain It is essential that best practice for Biodiversity Net Gain (BNG) is followed and that strong consideration for the Local Nature Recovery Strategy is included wherever post-development Biodiversity Net Gain units are delivered. The biodiversity value of such habitat can be further enhanced by looking to create habitat of a type or in a location to benefit key species. We acknowledge that there is currently no requirement for mandatory net gain for NSIPs, however as this project has committed to providing in excess of 10% net gain it is important that trading rules and best practice principles are followed throughout.	The Norfolk LNRS was published in October 2025 after the submitted Biodiversity Net Gain Assessment Report [APP/7.4.1] had been prepared. As noted within the submitted Biodiversity Net Gain Assessment Report [APP/7.4.1] , the assessment has been updated in order to reflect the LNRS publication and address trading rules, and has been submitted at Deadline 1. Best practice principles have been followed.
NWT7	Paragraph 4.5.4 (BNG report) states that under the terms of the metric, the habitat units identify a “trading error” due to the loss of habitat units associated with “arable field margins game bird mix” habitat which will be lost under the Scheme. Should it not be possible to address the required units within the Site, any further requirement will need to be delivered off-site in order to ensure that the trading requirements can be met (as acknowledged in para 4.5.5 BNG Report).	The trading rules have been addressed within the updated Biodiversity Net Gain Assessment Report [APP/7.4.1] submitted at Deadline 1, and as such, no off-site delivery will be required.
NWT8	We welcome the commitment outlined in the BNG report that the project will deliver net gain in habitat and hedgerow units substantially in excess of 10%. Under BNG’s additionality rules, habitat measures delivered to mitigate or compensate for impacts to protected sites and species can only count towards, and not beyond, no-net-loss, for example the mitigation measures that are proposed for skylark and curlew. To ensure additionality of the Project’s BNG, habitat created or enhanced to meet statutory mitigation or compensation for impacts to protected sites or species should be clearly identified in the BNG assessment.	Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], using the government metric and associated guidance. The Applicant notes the comment in regard to BNG additionality, which is in accordance with DEFRA guidance. The BNG Assessment necessarily provides an objective view of the change in ecological value of the site under the terms of the metric and must reflect the change in value of habitats throughout the site area regardless of the purpose. Nonetheless, whilst habitats providing mitigation or compensation in respect of species such as Skylark and Curlew contribute to the overall BNG, significant new habitats will be created throughout the Site (as identified within the oLEMP [APP/7.11.1], Biodiversity Net Gain Assessment Report [APP/7.4.1] and secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.1]), representing the majority of BNG contribution which therefore provide net gains in excess of 10%, such that the guidance in regard to additionality will be fully met. For further clarity, in line with the comments received, as part of the updated Biodiversity Net Gain Assessment Report [APP/7.4.1] at Deadline 1, habitats created



Reference number	Representation	Applicant response
		or enhanced to meet mitigation or compensation requirements for protected species have been specifically identified within the comments section associated with each habitat line.
NWT9	LNRS We note that the Local Nature Recovery Plan for Norfolk has now been published so all references to the draft plan need to be updated. Paragraph 7.2.29 (oLEMP) outlines a suite of potential measures from the draft LNRS. The published LNRS contains several additional measures which should be taken into account, such as Arable Field Margins Creation [PM09], Calcareous Grassland Creation [PM21], River, Riparian And Floodplain Habitat Creation [PM30], Still Water Restoration [PM32], Veteran Trees Restoration [PM50], Water vole [spm26], Turtle dove [spm32].	The oLEMP [APP/7.11.1] has been updated at Deadline 1 to make reference to the adopted LNRS and take account of the relevant updates.
NW10	Masterplanning and Layout 11. The proposed siting of substations and BESS within Fields 24 and 27 is of significant concern. These areas coincide with some of the highest levels of bat activity recorded on site, as identified in the Baseline Ecology Report.	ES Appendix 7.2: Baseline Ecological Survey Report [APP-148] details the results of the bat surveys, which show levels of bat activity at monitored locations throughout the Site including SD1 to north east of Field 27 and SD2 to the east of Fields 24 and 27. Raised levels of Barbastelle registrations were recorded at location SD2 in particular (albeit all locations across the Site identified registrations by this species), which is likely to be of particular concern due to its rarer status. This species roosts in woodlands and typically forages close to tree canopies and woodland habitat, and at vegetation edges and can forage over large areas. Hence the internal field areas within the Site are unlikely to be of value to this species, albeit the woodland and hedgerow corridors (which will be retained and strengthened) provide foraging and commuting routes. The Applicant has established a set of global design principles, as set out in the Design Approach Document [AS-009]. Global Design Principle 2 addresses environmentally led design, under which the Applicant has developed a series of design principles applicable to the Scheme, which includes: 2.2 – Retain and enhance existing vegetation wherever possible to retain the fabric of the Site and aid integration of the Scheme into its context. In accordance with this Design Principle the existing hedgerows and woodland within the Scheme have been retained. The Applicant has also enhanced the existing features within the Site; measures include: 50m offsets associated with Fincham Drove and Petticoat Drove (and respective PRoW South Acre RB6 and RB1), creating 50m wide routes through the Site, amplifying their role as key green infrastructure corridors and reinforcing their legibility. - Creation of tree belts along the eastern and western edges of Field 27 which will provide connectivity between the woodland blocks. These commitments have been made to improve ecological habitat in these areas, as detailed in the oLEMP [APP/7.11.1]. Additionally, commitments to ensure that a sensitive lighting strategy is developed as part of the detailed design to mitigate adverse impacts to bats have been made within the oCEMP [APP/7.6.1] and oOEMP [APP/7.8.1]. Due to the Applicant's commitments to improving habitat and mitigating impacts to bats, the bat activity surveys were not an influence on substation location in the design evolution process. The siting of the Customer Substation, National Grid Substation and BESS in Fields 27 and 24 has been assessed on a worst-case basis in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] and concluded that following the implementation of the embedded mitigation and additional mitigation proposed, the Scheme will result in no adverse likely significant effects on bats. The key features identified to support bat commuting and foraging within the Site are the hedgerows and woodland edges. The Customer Substation and BESS will be located internally within fields and will not affect boundary features, including no significant light spill onto boundary features, and as such features of importance



Reference number	Representation	Applicant response
		for bats will remain unaffected and connectivity maintained within the landscape. The oOEMP [APP/7.8.1] states that “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”.
NW11	The requirement for new lighting in these locations, as well as increased noise, has the potential to cause adverse impacts on bats and other nocturnal wildlife. NWT strongly recommends that: a. Alternative locations for infrastructure requiring lighting are explored; and b. The design prioritises avoidance of impacts on nocturnal species.	ES Appendix 7.2: Baseline Ecological Survey Report [APP-148] details the results of the bat surveys, which show levels of bat activity at monitored locations throughout the Site including SD1 to north east of Field 27 and SD2 to the east of Fields 24 and 27. Commitments have been made to improve ecological habitat in these areas, as detailed in the oLEMP [APP/7.11.1]. Additionally, commitments to ensure that a sensitive lighting strategy is developed as part of the detailed design to mitigate adverse impacts to bats have been made within the oCEMP [APP/7.6.1] and oOEMP [APP/7.8.1]. Due to the Applicant's commitments to improving habitat and mitigating impacts to bats, the bat activity surveys were not an influence on substation location in the design evolution process. The Design Principles, Parameters and Commitments [APP/5.8.1] confirm that “The Solar arrays will not be lit during the operational phase”, such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. Measures to control lighting and prevent adverse effects are set out within the oCEMP [APP/7.6.1]. Therefore, the Applicant is confident that the design of the Scheme will prioritise avoidance of impacts on nocturnal species. The siting of the Customer Substation, National Grid Substation and BESS in Fields 27 and 24 has been assessed on a worst-case basis in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] and concluded that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects on bats, and as such, consideration of alternative locations for this infrastructure is not necessary.
NW12	Designated Sites River Road Roadside Nature Reserve 033086 lies within the Site boundary and RNR U22086 is adjacent to it. There is an access track proposed to run immediately adjacent to RNR U33086 within field 10. Appropriate mitigation must be secured to avoid adverse impacts on these non-statutory but locally important habitats.	River Road Roadside Nature Reserve U33086 is fully retained and enhanced within the Scheme, as detailed within the Biodiversity Net Gain Assessment Report [APP/7.4.1] . Access routes shown remain indicative at this stage and will therefore be determined at the detailed design stage; nonetheless, safeguarding measures, such as appropriate buffers, are set out within the oCEMP [APP/7.6.1] to safeguard and avoid adverse impacts on this non-statutory (but locally important) designation and the adjacent RNR U22086 and ongoing management and monitoring measures, such as grassland management, for RNR 033086 are set out within the oLEMP [APP/7.11.1] .
NW13	Buffers and Habitat Protection NWT recommends that buffers around watercourses, ditches and ponds are increased to a minimum of 20 metres to reduce pollution risk and enhance biodiversity. We also recommend that the buffer distance around woodlands which support bats is also widened.	Appropriate buffer distances have been identified in relation to specific habitats and landscape features (which will provide increased stable habitats in relation to the current intensive arable management), as detailed within ES Chapter 5: The Scheme [APP/6.1.2]. No watercourses are present within or adjacent to the Site and therefore no specific buffer distance is required in regard to watercourses. Comments received from the EA (EA9) requested that the Applicant commit to avoiding the riparian zone (defined as 10m from bank top under BNG guidance). Accordingly in order to address this comment and ensure consistency, buffer zones of 10m from bank top will be confirmed within ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], as referenced within the oCEMP [APP/7.6.1] and secured through Requirement 13 in Schedule 2 to the draft DCO [APP/3.1.1]. In regard to ditches and hedgerows, the stated 10m buffer distance will provide increased widths of undisturbed habitat in relation to the existing position due to the maintenance and strengthening of permanent vegetation (as identified within the oLEMP [APP/7.11.1], Biodiversity Net Gain Assessment Report [APP/7.4.1] and secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.1]) replacing intensively managed arable land subject to frequent ploughing disturbance and chemical input. As such, the committed buffers represent betterment over the existing position and remain appropriate in relation to these habitats. In addition, further specific measures are also set out within the oCEMP [APP/7.6.1] and oDS [APP/7.10.1] to safeguard these features against pollution during the course of the construction and decommissioning phases.
NW14	Bats, Lighting and Protected Species The presence of barbastelle bats, a protected species, within the red line boundary is of particular concern. Paragraph 7.7.25 (Chap 7, ES)	The Design Principles, Parameters and Commitments [APP/5.8.1] confirms that “The Solar arrays will not be lit during the operational phase”, such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS



Reference number	Representation	Applicant response
	states that no new lighting is proposed within the Solar PV Site areas and that new lighting will be limited to locations essential to security, namely the Customer Substation, National Grid Substation, and Battery Energy Storage System (BESS).	compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects are set out within the oCEMP [APP/7.6.1] . Barbastelle bats roost in woodlands and typically forage close to tree canopies and woodland habitat, and at vegetation edges and can forage over large areas. Hence the internal field areas within the Site are unlikely to be of value to this species, albeit the woodland and hedgerow corridors (which will be retained and strengthened) provide foraging and commuting routes. The Customer Substation and BESS will be located internally within fields and will not affect boundary features, including no significant light spill onto boundary features, and as such features of importance for bats will remain unaffected and connectivity maintained within the landscape As such, ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects on bats.
NW15	Currently, the BESS and substation are proposed to be located within fields 24 and 27. These are the fields with some of the highest recordings if bat activity.	The key features identified to support bat commuting and foraging within the Site are the hedgerows and woodland edges. The Customer Substation and BESS will be located internally within fields and will not affect boundary features, including no significant light spill onto boundary features, and as such features of importance for bats will remain unaffected and connectivity maintained within the landscape. The oOEMP [APP/7.8.1] states that “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”.
NW16	Additional land to accommodate Skylark and Curlew mitigation We note that new pylons will be installed and that this pylon route will run straight through the new area proposed for skylark and curlew mitigation. Installing pylons in an area proposed for curlew mitigation could significantly undermine the success of the area by causing issues of collision for adult birds and by providing perches for predators. Guidance is that new infrastructure such as pylons should not be placed in sensitive areas.	Proposed Skylark and Curlew mitigation measures are set out within the ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149] incorporating a range of measures including the provision of the specific area of 8ha land managed as grassland for use by ground nesting birds including Curlew, commensurate with the existing (low) levels of use of the site recorded (1-2 pairs of Curlew). Impacts of the Scheme on ground nesting birds (in particular Skylark and Curlew, including with reference to the proposed mitigation and compensation measures) have been specifically considered within section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes no significant effects are anticipated.



5 Land Interests (as listed in the Book of Reference)

5.1 RR-014, Charlie Ward

Reference number	Representation	Applicant response
LI1	I am a contract farmer who farms the land and would like to be kept up to date and involved in this process.	The Applicant notes this comment and will continue to engage with Mr Ward throughout, and subsequent to, the examination of the DCO Application.



6 Elected Representatives

6.1 RR-062, Cllr Tim Hubbard

Reference number	Representation	Applicant response
TH1	While supporting the principle of solar power generation as part of a balanced approach to meet national power requirements, its contribution should not be at the cost of, local landscape character and in this case the historic villages of Castle Acre and South Acre and their heritage assets, archaeological resource, biodiversity and protected species, BMV agricultural land, public enjoyment of the Nar Valley and its nationally important heritage setting along with local community well-being.	NPS EN-1 (2023) states, at paragraph 2.3.3, that the Government's policy objectives for the energy system are <i>"to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050"</i>. The 2025 NPS maintains the same wording at paragraph 2.3.3, which further supports our position as the policy has remained consistent in this regard. Meeting this objective will require a rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure, per paragraph 2.3.5 of NPS EN-1 (2025). NPS EN-3 (2025) states, at paragraph 2.10.2, that <i>"Solar energy is at the heart of our Clean Power 2030 Mission"</i> and at paragraph 2.10.5 that <i>"Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation"</i>. The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects, such as the Scheme, to meet Government's aim for a clean power system from 2030. The Statement of Need [APP-042] that NPS EN-1 (2023), at paragraphs 3.2.8 and 3.2.9, establishes that there is an urgent need for the Scheme and that substantial weight should be given to that need. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme. Sections 9 and 10 of the Planning Statement [APP/5.5.1] set out how the Applicant has considered the potential effects of the Scheme on the environment within the ES and concludes that the combined nature of the benefits of the Scheme outweigh any residual effects and that the planning balance is, therefore, firmly in favour of approval. The Applicant has responded to the topic-specific points raised in the comment below.
TH2	I object to the The Drovers Solar Farm proposal (alongside that of the High Grove Solar Farms). It would result in significant and enduring harm to the local landscape character, the historic villages of Castle Acre and South Acre and their heritage assets, archaeological resource, biodiversity and protected species, BMV agricultural land, and public enjoyment of the Nar Valley and its nationally important heritage setting.	ES Chapter 6: Landscape and Visual [AS-016] assesses potential landscape and visual impacts as a result of the Scheme. Embedded mitigation measures, as described below, within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and, more specifically, Project Principles 2.1 <i>"respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment"</i>, 2.5 <i>"respect setting of heritage assets along the Nar Valley"</i>, 2.8 <i>"consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane"</i> and 2.9 <i>"consider experience of people using the PRoW"</i>. Mitigation measures include: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed



Reference number	Representation	Applicant response
		maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameters Commitments [APP-048]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. Potential impacts on landscape character have been assessed in ES Chapter 6: Landscape and Visual [AS-016], based on Landscape Character Types and Landscape Character Areas defined within the Breckland Landscape Character Assessment (2007) and Kings Lynn and West Norfolk Landscape Character Assessment (2007) and illustrated in ES Figure 6.4: Landscape Character [APP-081]. This included an assessment of Landscape Character Area F1 River Nar Valley which lies within the Scheme's landscape and visual study area. The assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. Potential visual effects for visual receptors located throughout the Nar Valley and specifically within South Acre and Castle Acre have been considered and assessed in detail within ES Chapter 6: Landscape and Visual [AS-016], which specifically considers relevant viewpoint locations and photography situated within Castle Acre and South Acre shown within ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088]. Visualisations of the Scheme from viewpoints situated within Castle Acre have been produced for viewpoints 12 and 14 and included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. The assessment concludes that there would be no potential long term standalone significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. Taking account of High Grove Solar Farm, the assessment of likely cumulative effects concludes the following significant residual adverse impacts upon Landscape and Visual receptors: • E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the Scheme with High Grove Solar; and • VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRow Sporle with Palgrave BR5 across the construction and decommissioning phases of the Scheme with High Grove Solar. ES Chapter 8: Cultural Heritage [APP-057] presents a detailed assessment of the historical nature of the Site, archaeological context, surrounding area and heritage assets contained therein along with potential impacts of the Scheme upon the historic environment. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be low/negligible at most. The chapter concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'. Appendix 8.7: Archaeological Mitigation Strategy [APP-161] sets out the embedded and additional mitigation measures that will minimise impacts of the Scheme on the archaeological resource, and concludes that there will be no significant effects. Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.1]. This assessment considers baseline ecological conditions and evaluates likely significant effects from the construction, operation and maintenance and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on



Reference number	Representation	Applicant response
		habitats and protected and notable species and concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], using the Government metric and associated guidance, which demonstrates that the Scheme will deliver 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. The effects on soils and agricultural land are addressed in ES Chapter 11: Soils and Agriculture [AS-018]. The assessment concludes that there are no significant adverse effects resulting from the loss or downgrading of agricultural land, which is largely unaffected by the Scheme. There will be a change in the farming activities that can be undertaken, but there is no local or national food producing policy and there will be no significant adverse effect on food production regionally or nationally. This is assessed in ES Chapter 11: Soils and Agriculture [AS-018]. Overall, ES Chapter 11: Soils and Agriculture [AS-018] concludes that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production. Section 11.11 of ES Chapter 11: Soils and Agriculture [AS-018] considers the cumulative effects with other large-scale solar proposals and concludes that the cumulative effect is also small, around 1% of farmed land in Norfolk. ES Appendix 6.8: Amenity and Recreation Assessment [APP-146] assessed the potential effects upon receptors within publicly accessible landscapes and PRow through the study area including users of the Nar Valley Way. The assessment concludes that there would be no significant adverse effects on PRow and accessible landscapes within the study area. The assessment does acknowledge 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 Coast Path National Trail, The Nar Valley Way. The assessment also acknowledges 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. None of these adverse effects were assessed as being significant. With regard to cumulative impacts taking account of High Grove Solar Farm, the assessment concluded that there would likely be significant cumulative amenity and recreational effects on PRow Sporle with Palgrave BR5, to the east of the Order limits, during construction. The assessment states <i>“the potential for significant cumulative effects would be present along this route if the construction and decommissioning of the Scheme were to be undertaken during the same period as High Grove Solar being operational, constructed or decommissioned.”</i>
TH3	‘The Drovers Solar Farm’ proposal is incompatible with Castle Acre & South Acre's heritage status, ecological importance, and community-led planning objectives. It represents a form of unsustainable industrial development that would cause long-term, some irreversible and unjustified harm to an irreplaceable historic and natural environment.	NPS EN-1 (2023) states, at paragraph 2.3.3, that the Government's policy objectives for the energy system are <i>“to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050”</i>. The 2025 NPS maintains the same wording at paragraph 2.3.3, which further supports the Applicant's position as the policy has remained consistent in this regard. Meeting this objective will require a rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure, per paragraph 2.3.5 of NPS EN-1 (2025). NPS EN-3 (2025) states, at paragraph 2.10.2, that <i>“Solar energy is at the heart of our Clean Power 2030 Mission”</i> and at paragraph 2.10.5 that <i>“Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation”</i>. The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects, such as the Scheme, to meet Government's aim for a clean power system from 2030. The Statement of Need [APP-042] explains that NPS EN-1 (2023), at paragraphs 3.2.8 and 3.2.9, establishes that there is an urgent need. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme – which it considers (per the documents submitted with the DCO Application) to be sustainable and justified. The Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors, including consideration of designated international and national ecological and geological sites, nationally designated landscapes, ancient woodland, flooding and heritage and archaeological. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053]



Reference number	Representation	Applicant response
		and Planning Statement [APP/5.5.1] (Appendix 1: Site Evaluation Report) explains the methodology that has been applied when identifying and evaluating potential sites for the Scheme. The ES, submitted as part of the DCO Application, considers the likely significant effects of the Scheme on the environment, including effects on heritage, ecology and the wider community. With specific regard to effects on heritage, ES Chapter 8: Cultural Heritage and Archaeology [APP-057] sets out that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, and that all residual adverse effects constitute 'less than substantial harm' – this includes in relation to Castle Acre and South Acre. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] outlines that 'substantial harm' is afforded to any adverse effect that is of a major magnitude, whilst moderate, minor or negligible adverse effects represent effects that are of 'less than substantial harm' in nature. With specific regard to effects to ecology, ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] confirms that no significant adverse effects are anticipated at national or local nature conservation sites, protected species, habitats and other species. ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] explains that veteran trees are considered irreplaceable habitats, so the retention of these trees has been designed into the Scheme, and these features will be protected throughout the lifetime of the Scheme, as set out in the oLEMP [APP/7.11.1], and secured via a requirement of the draft DCO [APP3.1.1]. In relation to the community, the Applicant would also like to make reference to the following benefits that the Scheme is set to provide (as set out in the Planning Statement [APP/5.5.1]): • Substantial positive contribution to meeting the urgent need for renewable electricity generation in line with meeting net zero by 2050 targets • GHG savings, reduction strategy measures are included within the oCEMP [APP/7.6.1] and oOEMP [APP/7.8.1] • Delivering ecological enhancements and net gain by providing a minimum of 10% biodiversity net gain in habitat units and hedgerow units, as set out in the oLEMP [APP/7.11.1] • Improvements to connectivity through the provision of approximately 3.5km of permissive paths within the Order limits as set out in the oPRoWPPMP [APP-192]; • During construction, taking the net direct and indirect jobs together, the Scheme is expected to support 1,145 net additional jobs, with between 285 and 575 of these being taken by Local Catchment Area residents, as set out in oESSCS [APP-195]; and • Enhancement of local education through promoting apprenticeship and training schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practices which can continue alongside operation of the Scheme, as set out in oESSCS [APP-195]. Having regard to all important and relevant matters, the Applicant concludes in the Planning Statement [APP/5.5.1] that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1 (2023).
TH4	While national policy supports renewable energy development, that support is explicitly conditional upon the avoidance or clear justification of harm to designated heritage assets and their setting, best and most versatile agricultural land, valued landscapes, ecological networks, and rural amenity. In this case, the application fails to demonstrate that such harm has been adequately avoided, minimised, or convincingly justified.	As set out in the NPPF and paragraphs 4.2.21 and 4.2.28 of NPS EN-1 (2025), renewable energy development is supported in principle but requires that any harm to heritage assets, BMV agricultural land, valued landscapes, ecological networks, and rural amenity must be avoided or clearly justified. The Policy Compliance Document [APP/5.6.1] demonstrates the Scheme's compliance with the relevant NPSs and the NPPF. The Planning Statement [APP/5.5.1], under Section 9, confirms that the CNP presumption applies to the Scheme. As summarised in the Planning Statement [APP/5.5.1], there are no residual impacts as a result of the Scheme which would outweigh its need, nor are there any residual impacts which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats, the achievement of net zero, offshore navigation, flood and coastal erosion. As explained within the Planning Statement [APP/5.5.1], any harm caused by the Scheme is significantly outweighed by the substantial benefits that are delivered. It is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted.



Reference number	Representation	Applicant response
		In terms of potential effects upon “Valued landscapes”, paragraph 6.3.21 and Table 6.2 Landscape Value within ES Chapter 6: Landscape and Visual [APP/6.2.2] outlines the methodology for determining landscape value. Paragraph 6.3.22 of ES Chapter 6: Landscape and Visual [APP/6.2.2] refers to NPPF paragraph 187 and paragraph 6.3.23 states that “<i>Areas of landscape of greater than Community value may be considered to be ‘valued landscapes’ because National and Local value landscapes are designated on a national or local scale due to their landscape value (greater than ordinary) and therefore could be deemed a valued landscape depending on their intrinsic qualities</i>”. As there are no national / international landscape designations the LVIA made judgements on landscape value based on Landscape Institute Technical Guidance Note TGN 02-21 “Assessing Landscape Value Outside National Designations” 2021 referred to in ES Appendix 6.5: Evaluation of Landscape Value [APP-143]. As explained in paragraph 6.4.109 of ES Chapter 6: Landscape and Visual [APP/6.2.2]: “<i>On the basis of the evaluation in ES Appendix 6.5: Evaluation of Landscape Value [APP/6.4], only two of the factors have been evaluated as being of a ‘Local’ value, with most of the criteria assessed as either of ‘Community’ value or ‘Limited’ value. The landscape value of the Site and its immediate context should be considered of a ‘Community’ value, which is defined as an “everyday landscape which is appreciated by the local community but has little or no wider recognition of its value”.</i> The LVIA concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA’s are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. Mitigation measures include: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew’s Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site’s context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRoW, roads and residential dwellings;] • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRoW by a minimum of 15m, to respect the amenity and experience for PRoW users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRoW network. In addition to this, a number



Reference number	Representation	Applicant response
		of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. Design principles 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 as secured in the oLEMP [APP/7.11.1]. New habitat creation will include grassland, scrub, and attenuation features.
TH5	The application relies on generic national need for renewable energy but totally fails to demonstrate why this particularly sensitive site, within an exceptional heritage and ecological landscape, is necessary to meet that need. No evidence is provided that equivalent or greater generating capacity could not be delivered through less harmful alternatives, including brownfield land, lower-grade agricultural land, rooftop solar, or dispersed schemes. In the absence of such evidence, the public benefits claimed are generic rather than site-specific and cannot outweigh the identified heritage, landscape, ecological, community and agricultural harm.	The Applicant supports the development of rooftop solar but alongside, not instead of, large-scale ground mount schemes. This is because, on their own, rooftop schemes will not deliver the required growth in new capacity to the required timelines to support the pace of carbon reduction required to hit the UK's legal targets. Section 6.3 of the Statement of Need [APP-042] provides further detail. The development of both rooftop and ground mount solar is supported in national policy at Paragraph 3.3.12 of NPS EN-1 (2023 and 2025) which explains that the Government does not believe small-scale schemes, which include rooftop schemes, will replace the need for new large-scale electricity infrastructure to meet the Government's energy objectives. Section 2.10 of the Statement of Need [APP-042] explains that the Government's Solar Roadmap (2025) describes that under the Government's current energy policy scenario, 60-65% of solar capacity installed by 2030 could be large-scale projects, further supporting the need for capacity growth in both rooftop and large-scale ground mount schemes. The Statement of Need [APP-042] explains that NPS EN-1 (2023) paragraphs 3.2.6 and 3.2.7 establish that there is an urgent need for the Scheme, and that substantial weight should be given to that need. NPS EN-1 (2025) retains this policy position at paragraphs 3.2.8 and 3.2.9. Further, that the proposed location is appropriate for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in timeframes compatible with the government's aims, coupled with sufficient solar irradiance, and a suitable area of secured land for the proposed solar and BESS. Appendix 1 of the Planning Statement [APP/5.5.1] contains the Site Evaluation Report, which details the process followed in selecting the site location, including the environmental, landscape, and heritage considerations that fed into this process. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] has demonstrated the process undertaken in investigating and assessing reasonable alternatives relevant to the Scheme. It demonstrates that the design of the Scheme has iteratively developed to reduce the harm of the Scheme on the surrounding environment and sensitive receptors, arriving at the reasonably least harmful option. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme in the location proposed. The Applicant has applied the planning balance in the Planning Statement [APP/5.5.1] and considers that the identified substantial benefits of this Scheme outweigh the residual harms that would arise. Further, the CNP presumption means that these residual impacts are outweighed by the urgent need for this Scheme. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein along with potential impacts of the Scheme upon the historic environment. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be low/negligible at most. The chapter concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'. Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2]. This assessment considers baseline ecological conditions and evaluates likely significant effects from the construction, operation and maintenance and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species and concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], using the Government metric and associated guidance, which demonstrates that the Scheme will deliver 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.
TH6	In particular, the proposal fails to: • Demonstrate that reasonable alternatives, including less harmful locations for key infrastructure, have been properly assessed.	The Applicant considers that it has demonstrated reasonable alternatives appropriately within its DCO Application. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] explains that the design and layout, and extent, of the Scheme has been subject to an iterative process involving the developer, the design team and project principles, and the environmental consultant team, plus is informed by feedback from statutory consultees, host authorities and local communities through the scoping and consultation process. As recognised within the design policies set out in the NPSs, the context of any design decisions must reflect the need to efficiently deliver large



Reference number	Representation	Applicant response
		scale renewable energy infrastructure and therefore the extent to which the Scheme is able to enhance the quality of the local area may be limited. Table 4-3 in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] summarises the main infrastructure layout iterations for the Scheme following statutory consultation, demonstrating how the design evolved to reduce potential impacts from key infrastructure, including, but not limited to: - The siting zones for the National Grid Substation and Customer Substation were removed from fields to the north of Batholomew's Hills Plantation and located to the south of the plantation. The siting zones for the National Grid Substation and Customer Substation are now restricted to Field 27 only; and - The siting zones for BESS were removed from fields to the north of Batholomew's Hills Plantation and located to the south of the plantation. The siting zone for BESS is now restricted to part of Field 27 and part of Field 24. The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects such as the Scheme and that large-scale projects are needed alongside smaller scale projects (such as rooftop, community energy schemes and microgeneration) to meet government's aim for a clean power system from 2030 to meet Government's aim for a clean power system from 2030.
TH7	Provide sufficient evidence that the harm to identified heritage assets, their setting, and the wider cultural landscape of the Nar Valley are clearly outweighed by public benefits.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein (including those falling within the Nar Valley) along with potential impacts of the Scheme upon the historic environment. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be low/negligible at most. The chapter concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'.
TH8	Adequately assess cumulative impacts within the Nar Valley and the wider context of extensive existing and proposed energy infrastructure.	The assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations⁹ and the Planning Inspectorate's advice note on Cumulative Effects Assessment¹⁰. The approach to cumulative assessment is detailed in ES Chapter 2: EIA Process and Methodology [APP-051] and ES Appendix 2.4: Cumulative Schemes [APP-136]. Cumulative assessments within each of the technical topic chapters have been undertaken in accordance with the relevant topic specific guidance and best practice approach, assessing a reasonable worst-case scenario. Nar Valley and sensitive receptors within the Nar Valley have been identified and assessed as part of the cumulative effects assessment in ES Chapter 6: Landscape and Visual [APP/6.2.2] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. ES Chapter 6: Landscape and Visual [APP/6.2.2] concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area, including Nar Valley and sensitive receptors within the Nar Valley. With regard to landscape character, the assessment concludes that there would be no potential long term significant adverse landscape effects beyond the Order limits. The cultural heritage assessment concludes that there would be no significant effects on heritage receptors in the Nar Valley.
TH9	Provide sufficient certainty that archaeological and ecological assets, protected species would not be irreversibly harmed.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057], supported by ES Appendix 8.3: Archaeological Desk-Based Assessment [APP-153], ES Appendix 8.4: Geophysical Survey Report [APP-154 to APP-158], ES Appendix 8.5: Air Photo Services Report [APP-159] and ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160] present a detailed assessment of the known and potential archaeology within the Site and has assessed the potential impact of the Scheme on archaeological assets, and where required appropriate mitigation (ranging from preservation in situ to full archaeological excavation and recording) has been proposed ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161]. The chapter has concluded that, with mitigation measures in place there will be no significant effects upon the archaeological resource. Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2]. This assessment considers baseline ecological conditions and evaluates likely significant effects from the construction, operation and maintenance and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species and concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects.

⁹ HM Government, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

¹⁰ Planning Inspectorate, Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (September 2024)



Reference number	Representation	Applicant response
		Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1] , using the Government metric and associated guidance, which demonstrates that the Scheme will deliver 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.
TH10	I urge decision makers that the application should be refused.	As set out in the Planning Statement [APP/5.5.1], having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1. The Policy Compliance Document [APP/5.6.1] further demonstrates the Scheme's compliance with the relevant NPSs and the NPPF.



6.2 RR-025, George Freeman MP

Reference number	Representation	Applicant response
GF1	RE: The Drovers Solar Farm (EN0110013) – Statutory Relevant Representation As Member of Parliament for Mid Norfolk, I am writing to register as an interested party in the Drovers Solar Farm (NSIP) application. This submission reflects my concerns and the concerns raised by my constituents.	The Applicant notes this and responds to the points made in the submission below.
GF2	For the following reasons I consider this proposal represents unsustainable development conflicting with national policy, the local development plan, and Neighbourhood Plan and urge that permission is withheld until these very real issues have been properly addressed and taken into consideration.	The Applicant does not agree that the Scheme represents unsustainable development, nor that it conflicts with regional and national policy. The Planning Statement [APP/5.5.1] outlines how the Scheme achieves the three objectives of sustainable development, as defined in Paragraph 8 of the NPPF and GEN 01 Sustainable Development in Breckland of the Breckland Local Plan. The Planning Statement [APP/5.5.1] and the Statement of Need [APP-042] set out the critical need for large scale ground mounted solar deployment, as established under national planning policy, specifically NPS EN-1 and NPS EN-3. The Scheme would contribute substantially to the need for low carbon energy, in order for the Government to meet its objectives and commitments. By generating low carbon energy at a low marginal cost, large-scale solar power reduced the energy generated by more expensive and more carbon intensive forms of generation. The Scheme will help to decarbonise the electricity system and lower the market price of electricity. The Policy Compliance Document [APP/5.6.1] demonstrates the Scheme's compliance with the relevant NPSs, the NPPF and local plan policies.
GF3	Landscape, Visual Impact and Dark Skies. The Applicant asserts long-term significant adverse landscape effects will be confined “within the Site only,” relying on mitigation such as vegetation regimes to offset visual harm. However, the scale and permanence of the infrastructure remain a concern. Siting the Battery Energy Storage System (BESS) and associated assets on a sensitive landscape, including the prominent ridge of Bartholomew's Hills, risks materially compromising the openness and historic coherence of the Nar Valley. This is inconsistent with NPPF Paragraph 187(b) requiring the “intrinsic character and beauty of the countryside” be recognised. Concerns also remain regarding the project's operational lighting conflicting with the formally adopted Dark Skies Policy. The introduction of such lighting risks degrading the nocturnal character of the locality, contrary to the NPPF Paragraph 198(c) objective to “limit the impact of light pollution from artificial light on local amenity... and nature conservation.” It is noted that at this stage it is not known whether tracker or fixed panels will be used or where. This will have a significant bearing on the landscape and visual amenity. I would wish to see that the landscape and visual impact of the choice of panels having a	ES Chapter 6: Landscape and Visual [APP/6.2.2] assesses the long-term significant landscape effects as a result of the Scheme and the assessment concludes that landscape effects would be significant within the Site only for LCA D1 and E6. Regarding BESS and NPPF Paragraph 187(b), the BESS are not situated on the ‘prominent ridge of Bartholomew's Hills, they are situated to the south of the ridge and south of Bartholomew's Hills Plantation which serves to screen views of the Scheme from the north. Fields 24 and 27 are not considered to lie within a particularly “sensitive” landscape, these fields are located mostly within LCA D1 Swaffham Heath, with the southern end of Field 24 situated within LCA E6 North Pickenham Plateau. The assessment has judged these LCA as being of medium-low sensitivity (specifically of ‘community’ value and ‘medium’ susceptibility). The assessment has taken account of the qualities and characteristics of LCA D1 and E6 as part of the baseline assessment. This is supported by ES Appendix 6.5: Evaluation of Landscape Value [APP-143] which assessed the Site and immediate surrounding context based on Landscape Institute Technical Guidance Note TGN 02-21 “Assessing Landscape Value Outside National Designations” 2021. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. Mitigation measures include: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself



Reference number	Representation	Applicant response
	high priority within the design process and that the DCO reflects this. In addition, it is noted that substations and BESS have been located in fields 24 and 27. However, these fields are sloping as has already been highlighted in responses to consultations. My concern would be that these fields slope significantly and the levels that the BESS and substations are founded should ensure that there is a minimum of visibility and impact on the landscape particularly to those receptors in VRG4. Also retaining the option to keep the existing line of pylons and the new diversion is of concern. The impact of a double line of pylons on the landscape and visual character to the area should take a very high priority in decisions relating to the grid connection.	• The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRoW, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers, from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] secured by the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRoW by a minimum of 15m, to respect the amenity and experience for PRoW users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRoW network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRoW network within the study area to provide recreational benefits. With regard to the permanent nature of change, the Scheme duration is long term but predominantly reversible following the decommissioning phase. ES Chapter 6: Landscape and Visual [APP/6.2.2] assesses potential long term operational adverse landscape and visual effects based on the Scheme being long term reversible, as outlined in paragraph 6.5.23: <i>“Some forms of development, such as solar arrays, may also result in Long-term effects. Still, the intention is that the Scheme (excluding the National Grid Substation and Grid Connection Infrastructure which are the responsibility of National Grid) would be decommissioned at the end of its defined operational period, and effects would, therefore, no longer occur beyond that timeframe. These are assessed to be Long-term but reversible.”</i> The siting of the BESS, Customer Substation and National Grid Substation south of Bartholomew’s Hills plantation is a key embedded design measure to limit potential adverse landscape and visual impacts for receptors located to the north of the Order limits, such as Castle Acre, South Acre and the wider Nar Valley. This embedded design measure approach is outlined within Design Approach Document [AS-009] and aligns with the Applicant’s Global Design Principle 2, <i>“environmentally led design”</i>, and more specifically Project Principle 2.5 <i>“respect setting of heritage assets along the Nar Valley”</i>. Bartholomew’s Hills plantation restricts intervisibility between larger elements of the Scheme within Field 27, and landscape and visual receptors to the north of the Order limits. Fields 27 and 24 would more accurately described as undulating rather than ‘significantly sloping’, with variations in landform across the northern part of the Site, around Bartholomew’s Hills. Proposed levels associated with larger elements of the Scheme, within Field 27, would seek to be designed to limit potentially adverse visual effects upon receptors within VRG4, as far as reasonably possible, to ensure new built form sits well within the Site and is visually screened by the extensive planting proposed within the oLEMP [APP/7.11.1]. This design approach is outlined within Design Approach Document [AS-009] and specifically embedded within the Applicant’s Global Design Principle 2 and more specifically Project Principles 2.5 <i>“respect setting of heritage assets along the Nar Valley”</i>, 2.8 <i>“consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane”</i> and 2.9 <i>“consider experience of people using the PRoW”</i>. The Applicant has sought flexibility over the locations of Single Axis Trackers and Fixed South Facing PV Arrays, with either type of panel able to be located at any location within the Solar PV Site, as per the DCO Application. The potential landscape and visual effects detailed within ES Chapter 6: Landscape and Visual [APP/6.2.2] considers a worst-case scenario regarding the panel type, which in the context of the assessment is the ‘tallest’ maximum design parameters (i.e. the 4.5m tracker panels) of the Scheme. The Scheme has been visualised from a number of locations. Parameter based photowires are included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089] and ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031]. Photomontages of an illustrative scheme are included within ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA’s



Reference number	Representation	Applicant response
		are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. With regard to NPPF Paragraph 198(c) and dark skies, ES Chapter 6: Landscape and Visual [APP/6.2.2] paragraph 6.7.23 states that “<i>it is not considered likely that that the Scheme would result in any significant effects through additional lighting</i>”. Regarding operational lighting, the Scheme would not conflict with NPPF Para 198 (c) or the Dark Sky Policy in Castle Acre’s Neighbourhood Plan (adopted 2022) - Policy NE.4 Dark Skies. The Scheme limits light spillage and eliminates all unnecessary forms of artificial outdoor lighting, as defined within the oOEMP [APP/7.8.1]. With regard to NPPF Paragraph 198(c) and nature conservation, the key features identified to support bat commuting and foraging within the Site are the hedgerows and woodland edges. The National Grid Substation, Customer Substation and BESS will be located internally within fields and will not affect boundary features, including no significant light spill onto boundary features, and as such features of importance for bats will remain unaffected and connectivity maintained within the landscape. As such, the Scheme would not conflict with NPPF Paragraph 198 (c). Regarding operational lighting, the Applicant notes in ES Chapter 5: The Scheme [APP/6.1.2] 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. The design of any security lighting would also be sensitive to the local dark skies environment. Lighting is not required within the Solar PV Site during the operation phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. Temporary site lighting would be used during construction to enable safe working during construction in hours of darkness or where natural lighting is unable to reach (such as sheltered/confined areas). Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the construction compounds while construction is underway. The lighting commitments for the Scheme are set out in the oOEMP [APP/7.8.1]. It states that lighting is generally not required within the Solar PV Site during the operation phase of the Scheme. It also states that “<i>all routine maintenance activities, except for panel cleaning if required during the night time, would be scheduled for daylight hours as far as is practicable, and therefore it is anticipated that focussed task specific lighting should only be required in the event of emergency works/equipment failure requiring night-time working or panel cleaning operations, as deemed appropriate. Motion sensing security lighting would be provided within Customer Substation, National Grid Substation, and within the BESS compound to be used to maintain safe working conditions in winter months, security purposes, and maintenance activities. Light spill from internal lighting is anticipated to be minimal</i>”. Regarding the retention of the existing line of pylons and the new diversion, this has been assessed in the ES Chapter 6: Landscape and Visual [APP/6.2.2] and supported by visualisations of the Scheme from viewpoints situated within Castle Acre and along the Peddars Way and Norfolk Coast Path. These visualisations are included within ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA’s are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. The mitigation hierarchy has been applied throughout the design and development of the Scheme landscape and visual impacts have been minimised as far as practicable. The residual effects above cannot be mitigated further. Through the application of good design principles including the application of the mitigation hierarchy, a robust approach to secure good design would be achieved. Despite this approach, some significant residual visual effects would remain to two landscape receptors as summarised above. Paragraph 5.10.35 of NPS EN-1 (2023) confirms that “<i>The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project</i>”. The 2025 NPS maintains the same wording at paragraph 5.10.35, which further supports our position as the policy has remained consistent in this regard.
GF4	Cumulative Impact.	In accordance with NPPF paragraph 198, the Applicant has undertaken an assessment of likely cumulative effects, set out in each of the ES Topic Chapter and summarised in ES Chapter 18: Summary of Effects [APP-067]. ES Appendix 2.4: Cumulative Schemes [APP-



Reference number	Representation	Applicant response
	The Applicant asserts the Scheme would use less than 0.01% of the UK's utilised agricultural land and that cumulative effects are addressed in the Environmental Statement. However, this does not capture the local totality of impact, where approximately 6,700 acres would be covered by panels across two projects. This scale of development does not reflect NPPF Paragraph 198, which requires development to be appropriate to its location and to fully consider the "likely effects (including cumulative effects)" on the natural environment and living conditions. Reliance on national statistics also overlooks NPPF Paragraph 9, which requires decisions to "take local circumstances into account, to reflect the character, needs and opportunities of each area."	136 presents the schemes considered for assessment as part of the cumulative effects assessment within the ES. Table 2-3 of this appendix contains the details of the selected schemes and High Grove Solar (EN0110010) is the first listed scheme. High Grove Solar has been considered, as appropriate, in each of the technical chapters of the ES. Overall, ES Chapter 11: Soils and Agriculture [AS-018] concludes that, with embedded and additional mitigation measures in place, the Scheme would not result in any significant adverse effects on soil or agricultural land resources throughout its lifecycle. A worst-case cumulative assessment has been applied; there is the potential for permanent land loss of BMV quality from all the developments to exceed 20ha, which would result in a cumulative impact of a moderate adverse effect, which would be significant in EIA terms. With regards to the direct interactions with nearby projects, as set out in the Consultation Report [APP-025], the Applicant is in regular engagement with the applicant of High Grove Solar.
GF5	Loss of Agricultural Land. The Applicant maintains the Scheme constitutes 0.01% of the UK's utilised agricultural land and that its inclusion is justified by the "significant wider benefits" it will deliver. However, this continues to ignore the localised concentration and high quality of land affected, resulting in the permanent loss of Grade 2 and 3a BMV land. This conflicts with NPPF Paragraph 188, which states that "areas of poorer quality land should be preferred to those of a higher quality." The claimed "significant wider benefits" have not been clearly quantified or shown to outweigh this loss, and no transparent consideration of "reasonable alternatives" has been provided, as required by NPS EN-1, paragraph 4.3.15, leaving the justification insufficiently evidenced.	NPS EN-1 (2025) states, at paragraph 2.3.3, that the Government's policy objectives for the energy system are "to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050". Paragraph 2.3.5 of NPS EN-1 (2025) explains that these objectives will be met through a "rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure," consistent with the Clean Power Action Plan. NPS EN-3 (2025) states, at paragraph 2.10.2, that "solar energy is at the heart of [the government's] Clean Power 2030 Mission". It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme. The proposal does not conflict with NPPF paragraph 188, as this policy encourages using poorer quality land where possible but does not strictly prevent development on higher quality land. In this case, there is no clear evidence that suitable lower-quality sites are available. In line with NPS EN-1 (2023), reasonable alternatives have been considered, and the benefits of the project, especially for renewable energy, are considered to outweigh the limited impacts on the land. In accordance with paragraph 4.3.15 of NPS EN-1 (2023), ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] and Planning Statement [APP/5.5.1] Appendix 1: Site Evaluation Report explain the methodology that has been applied when identifying and evaluating the Site for the Scheme. Appendix 1: Site Evaluation Report to the Planning Statement [APP/5.5.1] sets out the background and approach to 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 evaluation considers the locational criteria (environmental, social, economic, and engineering constraints) that geographically influenced the area of search. After selecting the preferred locations for the components of the Scheme, based on the locational criteria and factors mentioned above, the Applicant developed a set of core design principles, which are described in the Design Approach Document [AS-009]. The Applicant would also like to make reference to the following benefits that the Scheme is set to provide (as set out in the Planning Statement [APP/5.5.1]): • Substantial positive contribution to meeting the urgent need for renewable electricity generation in line with meeting net zero by 2050 targets • GHG savings, reduction strategy measures are included within the oCEMP [APP/7.6.1] and oOEMP [APP/7.8.1] • Delivering ecological enhancements and net gain by providing a minimum of 10% biodiversity net gain in habitat units and hedgerow units, as set out in the oLEMP [APP/7.11.1] • Improvements to connectivity through the provision of approximately 3.5km of permissive paths within the Order limits, as set out in the oProWPPMP [APP-192];



Reference number	Representation	Applicant response
		- During construction, taking the net direct and indirect jobs together, the Scheme is expected to support 1,145 net additional jobs, with between 285 and 575 of these being taken by Local Catchment Area residents, as set out in oESSCS [APP-195]; and - Enhancement of local education through promoting apprenticeship and training schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practices which can continue alongside operation of the Scheme, as set out in oESSCS [APP-195].
GF6	Ecology and Biodiversity. The Applicant suggests ecological impacts can be mitigated via the outline Landscape and Ecological Management Plan. Nevertheless, significant risks remain for the River Nar SSSI catchment, described by the Norfolk Rivers Trust as "arguably Norfolk's most unspoilt and beautiful example" of a globally rare chalk stream. The proposal risks habitat fragmentation and displacement of farmland and ground-nesting birds. It is noted that all the fields of solar arrays will be surrounded with deer fencing as shown in Plate 13 in 6.1 ES Chapter 5: The Scheme. This is of significant local concern as it will concentrate deer movements, with the potential for increased accidents on the A1065 and other roads and tracks around the site. The Baseline Ecological Survey Report (6.4 ES Appendix 7.2) states in paragraph 5.6.3 that Roe Deer and Muntjac were seen during survey work but no effort has been made to understand the level of deer presence and activity. No survey of deer numbers has been undertaken, nor a deer management plan undertaken with surrounding landowners and the High Groves development. Deer movements on Norfolk roads already generate considerable hazards for road users, I would not want to see an increased risk. It is noted HM Government's introduction of the England Deer Strategy will require this to be taken into account to ensure numbers are kept in check and to ensure BNG targets are achieved.	Embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse, are secured through the oCEMP [APP/7.6.1], and full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in Section 7.7 and 7.8 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000053-7.7 outline Construction Traffic Management Plan.pdf The Site is located approximately 2.4km from the Breckland SPA designation at its closest point (whilst the closest components relate to Breckland Forest SSSI, which is not understood to provide suitable habitat for Stone Curlew in particular). Further, the Site is located entirely outside of the 1.5km constraint zone identified by Natural England based on the Stone Curlew Planning Tool (SCPT) (Ref: www.breckland.gov.uk/article/20784/Brecks-Special-Protection-Area, accessed September 2025). None of the qualifying species were recorded during any of the specific breeding bird surveys conducted at the Site in 2024, undertaken in accordance with guidance, and therefore the Site is not considered to represent functionally linked land used by qualifying species. Design principles 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/7.11.1]. New habitat creation will include grassland, scrub, and attenuation features. 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/7.6.1]. This includes, but is not limited to, measures to control noise, light, and pollution. Deer species do not receive direct legislative protection relevant to ecology or nature conservation, as deer species are not listed as priority species, albeit they may receive protection against acts of cruelty (for example, under the Wild Mammals (Protection) Act 1996). Impacts on mammal species in relation to nature conservation and biodiversity are considered within ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. Woodland habitats likely providing the focus of existing deer use will remain outside of the protection fencing, with wide corridors in particular along the droves which will provide continued routes through the Site for deer, as secured by Design Principles, Parameters and Commitments [APP/5.8.1]. These routes will therefore remain largely unchanged from the existing position. HM Government's England Deer Strategy sets out actions proposed in England to ensure the impacts of wild deer are not a threat to environmental, social). Measures will be incorporated into the detailed Landscape and Ecological Management Plan in order to ensure compliance with this strategy, where appropriate, as secured within the oLEMP [APP/7.11.1].
GF7	Scheduled Monuments and Archaeology. While the Applicant's evidence suggests no significant residual heritage effects, serious concerns remain that the assessment does not fully account for the wider "gateway impact" on a nationally important heritage cluster, including Scheduled Monuments such as Castle Acre Priory, the Castle, and the Dyke Hills defensive earthworks. By industrialising the approaches to these sites, the proposal does not give the "great weight" to the conservation of designated assets	ES Chapter 8: Cultural Heritage and Archaeology [APP-057], supported by ES Appendix 8.3: Archaeological Desk-Based Assessment [APP-153], ES Appendix 8.4: Geophysical Survey Report [APP-154 to APP-158], ES Appendix 8.5: Air Photo Services Report [APP-159] and Appendix 8.6: Archaeological Trial Trenching Report [APP-160] present a detailed assessment of the known and potential archaeology within the Site. The methods and extent of the archaeological surveys employed has been discussed and agreed with NCC Historic Environment Service as a proportionate and satisfactory amount of evaluation, which would be entirely in accordance with the requirements of NPPF Section 16. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] has assessed the potential impact of the Scheme on archaeological assets, and where required appropriate mitigation has been proposed ES Appendix 8.7: Archaeological Mitigation Strategy [APP-161]. The post consent mitigation proposed is consistent with common practice for both solar DCOs and those proposed under the Town and Country Planning Act.



Reference number	Representation	Applicant response
	required under NPPF Paragraph 212. Further, given the site's recognised archaeological potential, the application does not demonstrate sufficient evaluation to understand the full impacts of extensive ground disturbance prior to determination, as required by NPPF Section 16. Reliance on post-consent mitigation raises concern and risks irreversible harm to Roman, Saxon, and medieval remains.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is also supported by ES Appendix 8.2: Stage 1 and 2 Setting Assessment [APP-152] which has assessed the contribution of the Site to designated heritage assets in the surrounding area, many of which are 'clustered' in the Nar Valley to the north of the Site. In many cases the assessment has found that there is no shared 'experience' of the heritage assets from the bulk of the Site and, where meaningful 'experience' is available, built elements of the Scheme have been excluded in order to reduce or remove any impact. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the significance of these designated heritage assets, predominantly comprising the setting back of built form behind Bartholomew's Plantation, are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. With mitigation measures in place the assessments have found that, at most, there would be a minor level of harm from the Scheme to Castle Acre Castle, Castle Acre Priory and the Church of St George, other designated heritage assets in the Nar Valley would experience a neutral effect. These effects are not considered to be significant. With regards to paragraphs 212 of the NPPF it is for the decision taker to apply the 'great weight' to the conservation of designated heritage assets in weighing the public benefits of a scheme against and heritage harm.
GF8	Flood Risk and Soil Health. The Applicant contends that solar arrays do not create impermeable areas and that surface vegetation will manage runoff. However, these assurances do not fully address the Lancaster University Environment Centre which indicates sub-surface ground compaction and reduced organic carbon beneath solar panels. Concerns remain regarding reduced water infiltration exacerbating surface water flood risk in an area already prone to flooding. Therefore, the proposal does not convincingly demonstrate compliance with NPPF Paragraph 171, which requires planning policies "should consider cumulative impacts in, or affecting, local areas susceptible to flooding," nor with NPPF Paragraph 187(a), which requires decisions to protect and enhance the natural and local environment, including soils.	The Applicant considers that the Scheme is in compliance with Paragraph 171 of the NPPF. Cumulative flood risk has been assessed as part of the DCO Application, and it has been shown in ES Appendix 12.2: Flood Risk Assessment [AS-053], that the Scheme would not result in a significant increase in flood risk, either on its own or in combination with other schemes. There is a general misconception that solar arrays create impermeable areas, as the PV arrays are located well above the ground surface, have drip lines and substantial gaps between rows of panels and around the edges of panels. The Lancaster University Environment Centre paper (Carvalho et al. 2025) does not assert that solar farms increase surface water runoff and notes that there may be some changes (e.g., increased compaction, reduced vegetation) that may influence hydrological processes. As outlined in Section 12.3 (Solar PV Area Surface Water Management (Embedded Design)) of ES Appendix 12.2: Flood Risk Assessment [AS-053], the solar areas of the Scheme will utilise a Rural SuDS (RSuDS) strategy, using land management techniques, such as increase vegetation coverage and hedge/tree planting to manage runoff generated from the development infrastructure, and this is secured through the oLEMP [APP/7.11.1]. The summary below highlights some of the academic research supporting solar panels' effect on runoff and the use of land management strategies for reducing runoff: • Cook & McCuen (2013) outlines that solar panels do not have a significant effect on runoff volumes or peak flows when vegetation is present. For example, the article states "Inclusion of the panels did not have a significant hydrologic impact". Runoff is only increased when ground beneath panels is bare, which is not the case for the sites. • Valderrama et al (2024) and Wang and Gao (2023) show similar results to Cook & McCuen (2013), the inclusion of solar panels had a non-significant difference in peak discharge rate. • Walston et al. (2021) showed on average native grassland under solar panels increased water retention by 19% and 9.5% compared to agriculture and short (turf) grass. • Milazzo et al. (2023) reviews the role of grassland for erosion and flood mitigation in Europe and provides quantification that permanent grassland mitigates better runoff than arable land. • The EA (2025) published research and analysis of run-off management, the study highlights with high confidence the increase in vegetation cover (e.g. grassland) slows the flow of run-off and increases attenuation of water. The Site is currently arable land and, therefore, the use of grassland as a mitigation measure to reduce runoff and soil erosion will provide a betterment to the existing scenario. It should be noted that the Environment Agency have recently agreed that the implementation of grassland under the PV arrays for the Great North Road Solar and Biodiversity Park would not lead to an increase in runoff from the Site in their response to the ExA's Written Questions in that examination.



Reference number	Representation	Applicant response
		Regarding compliance with paragraph 187(a) of the NPPF, the Scheme does not impact sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan), as outlined in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], ES Chapter 11: Soils and Agriculture [AS-018] and ES Chapter 12: Water Recourses [APP-061]. As such, the Scheme is compliant with paragraph 187 of the NPPF. As outlined in the Policy Compliance Document [APP/5.6.1], the Scheme is also compliant with NPS EN-1, NPS EN-3, NPS EN-5, the NPPF and local planning policy, including Policy ENV09 Flood Risk & Surface Water Drainage of the Adopted Local Plan.
GF9	Construction Traffic and Impacts on Roads. The Applicant concludes there are “no significant adverse effects” from construction traffic, citing an outline Construction Traffic Management Plan that defers final routing to post-consent discussions. However, the projected 622 daily peak two-way vehicle movements on rural roads during the two-year construction phase present a realistic prospect of cumulative impacts, including road damage and delays for residents. There is also no mention of formal resident consultation regarding these measures. Therefore, the proposal has not satisfactorily demonstrated that it would avoid “unacceptable impacts on local roads,” as required by NPPF Paragraph 89. My constituents of Mid Norfolk have already experienced the impact of large-scale infrastructure builds with the offshore wind farms. Norfolk is also a rural county, with several large agricultural vehicles on the roads; has consideration been given for the actual reality of HGVs and large tractors sharing the same stretch of narrow roads, especially during the harvest seasons?	Construction traffic and HGVs will be restricted to access the Scheme from the east via the A1065 only, with internal routes provided within the Scheme to ensure that vehicles do not need to use the local road network or route via any of the local villages. The routing for HGVs is set out within the oCTMP [APP/7.7.1] and will be secured by way of requirement on the DCO. Failure to comply with the requirements of the DCO is a criminal offence. The assessment of the 622 two-way daily vehicles is considered in relation to the impact on the A1065 and the local road network, within the ES Chapter 9: Transport and Access [APP/6.2.1], which concludes that the impact on the A1065 and wider road network would be negligible as none of the relevant assessment thresholds for a significant effect are exceeded. Nonetheless, mitigation measures are secured within the oCTMP [APP/7.7.1], which include restrictions on HGV deliveries to avoid the AM (08:00-09:00) and PM (17:00-18:00) peak hours when the traffic flows on the network are the highest. Following requests during consultation from a meeting with NCC which took place in September 2024, an additional series of traffic surveys were undertaken in the summer during the harvest seasons (which were in addition to those undertaken in a traffic ‘neutral’ period) as presented within section 2.4 of the ES Appendix 9.2: Traffic Assessment [APP-163]. Though even with this sensitivity test during peak harvest the impact of construction traffic was negligible and no worse than the conclusions in ES Chapter 9: Transport and Access [APP/6.2.1]. ES Chapter 9: Transport and Access [APP/6.2.1] demonstrates that the development would not result in unacceptable impacts on the local road network. Any increase in traffic, particularly during construction, would be temporary and managed through appropriate mitigation measures which are secured through the oCTMP [APP/7.7.1]. The Scheme is therefore in compliance with Paragraph 89 of the NPPF as there is no impact on the local roads. Through the construction vehicle routing which is secured through the oCTMP [APP/7.7.1], there will not be any HGVs utilising the local roads as they will be restricted to use the A1065, so there will not be conflict with any agricultural vehicles on the surrounding roads. Regarding consideration of the reality of HGVs associated the Scheme utilising the permitted roads that are detailed in the oCTMP [APP/7.7.1], the A1065 has road width and the capacity to accommodate large vehicles with no constraints, as detailed within the swept path analysis included at Annex B of ES Appendix 9.2: Traffic Assessment [APP-163]. The Applicant notes that details of construction access, proposed routing and associated mitigation measures were set out in the consultation information booklet provided during statutory consultation. Residents were able to submit feedback and raise questions throughout the consultation period. The Applicant also notes that responses were provided to queries raised during consultation in relation to construction access. Further information was contained within the PEIR, alongside a Non-Technical Summary of the PEIR, which was also made available as part of the consultation materials.
GF10	BESS Safety. The Applicant references an outline Battery Safety Management Plan and fire assessment to suggest risks can be managed. However, these documents do not provide sufficient reassurance regarding the risks of thermal runaway or the potential release of toxic gases. The proposed “self-consume” firefighting strategy also continues to raise concerns about contaminated water runoff and the potential environmental impact of any incident. Furthermore, in relation to the risk of fire, the	The risk of BESS fires, and by default thermal runaway, can be established by recourse to the Renewable Energy Planning Database (REPD) compiled quarterly by the Department of Energy Security and Net Zero (DESNZ) and knowledge of the number of reported UK BESS fires, currently four. This extrapolation is in the oBSMP [APP-194], at Appendix A; however, it is noted that this references the REPD database available at the time of promulgation of the oBSMP [APP-194]. Therefore, the current data is produced below: From January 2026, REPD this data has been filtered for BESS installations and the following deduced: 1. The REPD states that as of December 2025 there were 136 operational UK BESS sites. 2. There have currently been four reported BESS fires in the UK that have required FRS attendance; these occurred at Carnegie Road, Liverpool in September 2020, Cirencester in March 2025, Rothi-enor-man in Aber-deen-shire in February 2025 and East Tilbury in February 2025.



Reference number	Representation	Applicant response
	current design only meets the minimum requirements in most cases. I would like to see enhanced protections. East Anglia is one of the driest counties in the UK. Breckland is recognised for its rich flora and fauna, wealth of biodiversity, a SSSI, home to the stone curlew, extensive farming, largest lowland Pine Forest in the UK. I therefore consider the proposed fire measures lacking in substance and more needs to be done to reassure and protect local communities.	3. The current operational UK BESS sites have accumulated an estimated 771 years of operation. 4. Given the overall UK BESS sites storage capacity of approx. 3.3GW, an estimation of the number of BESS units in use, using an individual BESS generic max capacity of 4MW, it has been determined that there are approx. 810-820 individual BESS units in operation across the UK. This provides an all-up operating time of approx. 26,396,124 hours of cumulative operation. 5. Given the approx. 26 million hours of operation and accounting for the four fires, this extrapolates out to approx. 1.54E-07 (0.000000154) failures per hour for BESS in the UK or 1 incident per 750 years per BESS. To date, there have been no recorded fatalities, third-party injuries, or environmental damage resulting from BESS incidents in the UK. Regarding the point on contaminated firefighting water, the National Fire Chiefs Council have issued a 'Position Statement' on the firefighting strategy to be adopted for BESS fires as one of 'controlled burn' and containment, as such the prospect of large volumes of 'contaminated' water is minimised. Regarding the point on 'the current design meets toe minimum requirements in most cases – the National Fire Chiefs Council Planning Guidance for BESS and the associated BESS Fire Fighting Strategy Position Statement, provides the necessary recommended approach for BESS installation layout, design and services. This guidance has been followed and the Site layout, design and provided services align with the guidance and position statement. Given the low residual risk, mitigation strategies applied and alignment with prevailing NFCCfire safety guidance, the safety strategy applied aligns with the HSE As Low As Reasonably Practical ethos.
GF11	Community Benefits. The Applicant acknowledges there is “no mandatory or legislative framework” for community benefits and instead proposes a generic community fund. Communities compelled to host nationally significant infrastructure have a reasonable expectation of proportionate, direct benefit, including at the very least compensation for any loss of property value, or the provision of discounted energy bills, which a generic fund does not meaningfully deliver.	The Applicant is committed to delivering a Community Benefit Fund as part of the Scheme, should development consent be granted. The Applicant considers this to be an appropriate and proportionate way of providing a direct benefit to the local community and will continue to engage with relevant stakeholders as the Scheme progresses on how such benefits can best respond to local priorities. The Applicant does not consider that the Scheme would have an impact on property prices. In relation to discounted energy bills, the electricity generated by the Scheme would be exported to the national grid, at which point it would cease to be under the Applicant's control and would instead be dispatched and distributed by the operator in accordance with supply and demand across the network. In those circumstances, discounted local electricity tariffs would not be a straightforward mechanism for delivering community benefit. The Applicant also notes that the Scheme would deliver a broader range of benefits, including in relation to employment, skills and local supply chain opportunities, as set out in ES Chapter 14: Socio-Economics [APP-063].
GF12	Conclusion The National Planning Policy Framework stipulates that decisions must take local circumstances into account, to reflect the character, needs and opportunities of each area and the cumulative impact of proposals. However, this scheme results in a level of significant harm to heritage, agricultural land, and communities that is not outweighed by the benefits advanced. I therefore urge the Examining Authority to weigh these concerns very carefully and that permission is withheld until these very real issues have been properly addressed and taken into consideration. Yours sincerely, George Freeman MP Mid Norfolk	The Scheme has been designed with careful regard to local circumstances, informed by ongoing consultation, technical engagement, and environmental assessment. Early and continued engagement with the local community, including public consultations, having helped shape the Scheme, as set out in the Consultation Report [APP-025]. A summary of how regard has been had to feedback received during statutory consultation is provided in Sections 7 and 8, with the full record of responses and the Applicant's replies included in Consultation Report Appendix G: Section 42 - Responses Received and Applicants Response [APP-037] and Consultation Report Appendix H: Section 47 - Responses Received and Applicants Response [APP-038]. The Statement of Need [APP-042] consistently concludes, in accordance with NPS EN-1 (2023), that the decarbonisation, security of supply, and affordability benefits delivered by the Scheme to the national urgent need for low-carbon generation should be afforded substantial weight in the planning balance and significantly outweigh the harm of the Scheme. Having regard to all important and relevant matters, the Applicant concludes in the Planning Statement [APP/5.5.1] that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1 (2023).





6.3 RR-029, James Wild MP

Reference number	Representation	Applicant response
JW1	RE: The Drovers Solar Farm (EN0110013) – Statutory Relevant Representation As Member of Parliament for North West Norfolk, I am writing to register as an interested party in the Drovers Solar Farm (NSIP) application. This submission follows my statutory consultation response of 9 July 2025 and reflects ongoing concerns raised by my constituents. For the following reasons I consider this proposal represents unsustainable development conflicting with national policy, the local development plan, and Neighbourhood Plan and should be refused:	The Applicant does not agree that the Scheme represents unsustainable development, nor that it conflicts with national and local policy. The Policy Compliance Document [APP/5.6.1] demonstrates the Scheme's compliance with the relevant NPSs, the NPPF and local plan policies. The Planning Statement [APP/5.5.1] outlines how the Scheme achieves the three objectives of sustainable development, as defined in Paragraph 8 of the NPPF. The Planning Statement [APP/5.5.1] and the Statement of Need [APP-042] set out the critical need for large scale ground mounted solar deployment, as established under national planning policy, specifically NPS EN-1 and NPS EN-3 (2023). The Scheme would contribute substantially to the need for low carbon energy, in order for the Government to meet its objectives and commitments. By generating low carbon energy at a low marginal cost, large-scale solar power reduced the energy generated by more expensive and more carbon intensive forms of generation. The Scheme will help to decarbonise the electricity system and lower the market price of electricity.
JW2	Landscape, Visual Impact and Dark Skies. The Applicant asserts long-term significant adverse landscape effects will be confined “within the Site only,” relying on mitigation such as vegetation regimes to offset visual harm. However, the scale and permanence of the infrastructure remain a concern. Siting the Battery Energy Storage System (BESS) and associated assets on a sensitive landscape, including the prominent ridge of Bartholomew's Hills, risks materially compromising the openness and historic coherence of the Nar Valley. This is inconsistent with NPPF Paragraph 187(b) requiring the “intrinsic character and beauty of the countryside” be recognised. Concerns also remain regarding the project's operational lighting conflicting with the formally adopted Dark Skies Policy of the Castle Acre Neighbourhood Plan. The introduction of such lighting risks degrading the nocturnal character of the locality, contrary to the NPPF Paragraph 198(c) objective to “limit the impact of light pollution from artificial light on local amenity... and nature conservation.”	The Applicant notes that this text is identical to that in reference GF3 above and therefore refers to its previous response.
JW3	Cumulative Impact. The Applicant asserts the Scheme would use less than 0.01% of the UK's utilised agricultural land and that cumulative effects are addressed in the Environmental Statement. However, this does not	The Applicant notes that this text is identical to that in reference GF4 above and therefore refers to its previous response.



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	capture the local totality of impact, where approximately 6,700 acres would be covered by panels across two projects. This scale of development does not reflect NPPF Paragraph 198, which requires development to be appropriate to its location and to fully consider the “likely effects (including cumulative effects)” on the natural environment and living conditions. Reliance on national statistics also overlooks NPPF Paragraph 9, which requires decisions to “take local circumstances into account, to reflect the character, needs and opportunities of each area.”	
JW4	Loss of Agricultural Land. The Applicant maintains the Scheme constitutes 0.01% of the UK’s utilised agricultural land and that its inclusion is justified by the “significant wider benefits” it will deliver. However, this continues to ignore the localised concentration and high quality of land affected, resulting in the permanent loss of Grade 2 and 3a BMV land. This conflicts with NPPF Paragraph 188, which states that “areas of poorer quality land should be preferred to those of a higher quality.” The claimed “significant wider benefits” have not been clearly quantified or shown to outweigh this loss, and no transparent consideration of “reasonable alternatives” has been provided, as required by NPS EN-1, paragraph 4.3.15, leaving the justification insufficiently evidenced.	The Applicant notes that this text is identical to that in reference GF5 above and therefore refers to its previous response.
JW5	Ecology and Biodiversity. The Applicant suggests ecological impacts can be mitigated via the outline Landscape and Ecological Management Plan. Nevertheless, significant risks remain for the River Nar SSSI catchment, described by the Norfolk Rivers Trust as “arguably Norfolk’s most unspoilt and beautiful example” of a globally rare chalk stream. The proposal risks habitat fragmentation and displacement of farmland and ground-nesting birds. Castle Acre parish council also raised concerns the Applicant’s bird surveys did not record the rare, amber-listed Stone Curlew - protected under Schedule 1 of the Wildlife and Countryside Act 1981 - which has recently been identified on the site. Consequently, I share concerns the proposal has not demonstrated that it meets the high threshold in NPPF Paragraph 193(b), which states development likely to have an adverse effect on an	In accordance with NPPF paragraph 193(b), https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000155-6.2_ES_Chapter_7_Ecology_and_Biodiversity.pdf embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse, are secured through the oCEMP [APP/7.6.1], and full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in Section 7.7 and 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. The Site is located approximately 2.4km from the Breckland SPA designation at its closest point (whilst the closest components relate to Breckland Forest SSSI, which is not understood to provide suitable habitat for Stone Curlew in particular. Further, the Site located entirely outside of the 1.5km constraint zone identified by Natural England based on the Stone Curlew Planning Tool (SCPT) (Ref: www.breckland.gov.uk/article/20784/Brecks-Special-Protection-Area, accessed September 2025). None of the qualifying species, including Stone Curlew, were recorded during any of the specific breeding bird surveys conducted at the Site in 2024, undertaken in accordance with guidance, and therefore the Site does not appear to represent functionally linked land used by qualifying species. In accordance with NPPF paragraph 193(c), design principles 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/7.11.1]. New habitat creation will include grassland, scrub, and attenuation features.



Reference number	Representation	Applicant response
	SSSI “should not normally be permitted,” nor that it adequately safeguards “irreplaceable habitats” as referenced in Paragraph 193(c).	To ensure that sensitive ecological receptors are protected through the construction of the Scheme, including irreplaceable habitats, measures to be adhered to are set out within the oCEMP [APP/7.6.1] . This includes, but is not limited to, measures to control noise, light, and pollution.
JW6	Scheduled Monuments and Archaeology. While the Applicant's evidence suggests no significant residual heritage effects, serious concerns remain that the assessment does not fully account for the wider “gateway impact” on a nationally important heritage cluster, including Scheduled Monuments such as Castle Acre Priory, the Castle, and the Dyke Hills defensive earthworks. By industrialising the approaches to these sites, the proposal does not give the “great weight” to the conservation of designated assets required under NPPF Paragraph 212. Further, given the site's recognised archaeological potential, the application does not demonstrate sufficient evaluation to understand the full impacts of extensive ground disturbance prior to determination, as required by NPPF Section 16. Reliance on post-consent mitigation raises concern and risks irreversible harm to Roman, Saxon, and medieval remains.	The Applicant notes that this text is identical to that in reference GF7 above and therefore refers to its previous response.
JW7	Flood Risk and Soil Health. The Applicant contends that solar arrays do not create impermeable areas and that surface vegetation will manage runoff. However, these assurances do not fully address the Lancaster University Environment Centre study I cited, which indicates subsurface ground compaction and reduced organic carbon beneath solar panels. Concerns remain regarding reduced water infiltration exacerbating surface water flood risk in an area already prone to flooding. Therefore, the proposal does not convincingly demonstrate compliance with NPPF Paragraph 171, which requires planning policies “should consider cumulative impacts in, or affecting, local areas susceptible to flooding,” nor with NPPF Paragraph 187(a), which requires decisions to protect and enhance the natural and local environment, including soils.	The Applicant notes that this text is identical to that in reference GF8 above and therefore refers to its previous response.
JW8	Construction Traffic and Impacts on Roads. The Applicant concludes there are “no significant adverse effects” from construction traffic, citing an outline Construction Traffic Management Plan that	The Applicant notes that this text is identical to that in reference GF9 above and therefore refers to its previous response.



Reference number	Representation	Applicant response
	defers final routing to post-consent discussions. However, the projected 622 daily peak two-way vehicle movements on rural roads during the two-year construction phase present a realistic prospect of cumulative impacts, including road damage and delays for residents. There is also no mention of formal resident consultation regarding these measures. Therefore, the proposal has not satisfactorily demonstrated that it would avoid “unacceptable impacts on local roads,” as required by NPPF Paragraph 89.	
JW9	BESS Safety. The Applicant references an outline Battery Safety Management Plan and fire assessment to suggest risks can be managed. However, these documents do not provide sufficient reassurance regarding the risks of thermal runaway or the potential release of toxic gases. The proposed “self-consume” firefighting strategy also continues to raise concerns about contaminated water runoff and the potential environmental impact of any incident.	The Applicant notes that this text is identical to that in reference GF10 above and therefore refers to its previous response.
JW10	Community Benefits. The Applicant acknowledges there is “no mandatory or legislative framework” for community benefits and instead proposes a generic community fund. Communities compelled to host nationally significant infrastructure have a reasonable expectation of proportionate, direct benefit, including at the very least compensation for any loss of property value, or the provision of discounted energy bills, which a generic fund does not meaningfully deliver.	The Applicant notes that this text is identical to that in reference GF11 above and therefore refers to its previous response.
JW11	Conclusion The National Planning Policy Framework stipulates that decisions must take local circumstances into account, to reflect the character, needs and opportunities of each area and the cumulative impact of proposals. However, this scheme results in a level of significant harm to heritage, agricultural land, and communities that is not outweighed by the benefits advanced. I therefore urge the Examining Authority to weigh these concerns very carefully and reject the proposals. Yours sincerely,	The Applicant notes that this text is identical to that in reference GF12 above and therefore refers to its previous response.



Reference number	Representation	Applicant response
	James Wild MP	



6.4 RR-058, Terry Jermy MP

Reference number	Representation	Applicant response
TJ1	Terry Jermy MP comments on Drovers Farm Solar Application for registration of interest with the Planning Inspectorate 20/01/2026. The following is taken from my comments on the statutory consultation in 2025. In my role as the UK's Member of Parliament for the South West Norfolk constituency, I wish to comment on the Drovers Farm Solar generation application which is within the constituency.	The Applicant notes this and responds to the points made in the submission below.
TJ2	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 the proposal. I share many of these and have highlighted some key issues below.	The Applicant acknowledges this comment and welcomes the agreement for the need to develop renewable energy. The specific concerns are responded to in the rows below. The Statement of Need [APP-042] provides evidence that there is an urgent need for an unprecedented capacity of new solar schemes. Further, that the proposed location is appropriate for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in timeframes compatible with the Government's aims, coupled with sufficient solar irradiance, and a suitable area of secured land for the proposed solar and BESS. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme in the location proposed.
TJ3	I am pleased to note that IGP has set out project level Design Principles in its consultation brochure The-Drovers-Solar-Farm_Consultation-Information-Booklet.pdf Agricultural Land and Food Security	The Applicant welcomes this comment.
TJ4	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. 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,	Section 11.8 of ES Chapter 11: Soils and Agriculture [AS-018] sets out an assessment of the potential effects on agriculture and the agricultural industry locally and section 11.11 undertakes a cumulative assessment of the proposal with other large-scale proposals locally. The land quality of the land across the Order limits is described in section 11.6 of ES Chapter 11: Soils and Agriculture [AS-018]. The site selection process identified that, from published material, the area chosen was likely to be some of the poorest agricultural quality in the wider area: see Plates 11-23 and 11-24 in section 11.7. The land quality is mixed, with most of the land falling into grades 2 good quality, subgrade 3a good quality and subgrade 3b moderate quality of the ALC. The distribution of these grades across the Order limits is shown on the ALC map insert at Plate 11-3 of ES Chapter 11: Soils and Agriculture [AS-018]. The proportion of land that is of BMV quality is shown in Table 11-4, which is 54% of the Site. The amount of land by ALC grade that is affected by temporary or permanent disturbance is summarised in Table 11-7 of ES Chapter 11: Soils and Agriculture [AS-018], and amounts to 38ha of BMV. The majority of this, except for 4.5ha for the National Grid Substation and Grid Connection Infrastructure, will be restored to comparable grade on decommissioning. Solar farms do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. They do, however, limit opportunities for arable farming uses. The potential effects on food production locally and nationally have been assessed in ES Chapter 11: Soils and Agriculture [AS-018]. There is no policy that requires agricultural land to be farmed for food production. As noted in paragraph 11.8.100 of ES Chapter 11: Soils



Reference number	Representation	Applicant response
	inappropriate or unsustainable development proposals.	and Agriculture [AS-018], as of 1 June 2025 some 444,000 ha of arable land in the UK was in agri-environmental land use (i.e. funded for non-production uses). The Organisation for Economic Co-operation and Development and the Food Agriculture Organisation's (OECD-FAO) joint study does not predict a worldwide shortage of food over the next 10 years, as stated in [paragraph 11.8.102 of ES Chapter 11: Soils and Agriculture [AS-018], nor does the UK Government. The biggest threat to food security is considered to be crop failure due to climate change, the Solar Roadmap advises, which solar farms are helping to tackle. There will be impacts on the wider rural economy resulting from the change from the current farming practices, but there will also be benefits. The management of sheep involves more labour per hectare than most arable cropping, and offers economic benefits for other parts of the wider rural economy. The impacts should, therefore, be considered in context. Currently, approximately 11% of arable land is not in production but is funded under agri-environmental land management schemes (444,000 ha). Overall, ES Chapter 11: Soils and Agriculture [AS-018] concludes that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production. Section 11.11 of ES Chapter 11: Soils and Agriculture [AS-018] considers the cumulative effects with other large-scale solar proposals and concludes that the cumulative effect is also small, around 1% of farmed land in Norfolk.
TJ5	Ecology and Biodiversity 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 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.	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000155-6.2_ES_Chapter_7_Ecology_and_Biodiversity.pdf Whilst precise location of nesting Stone Curlew (in line with other ground nesting birds) will indeed be dependent on crop rotations, due in particular to the need for open, bare stony ground during the breeding period, across the Site itself a range of crops were present during the survey period, including spring sown crops and suitable open ground (which also remain frequent within the offsite areas). Given the absence of Stone Curlew at the Site and the distance from the SPA, the assessment concluded that no significant effects on the SPA would be anticipated during the operation phase of the Scheme. This conclusion is proportionate and is in line with responses from Natural England through the scoping consultation and PEIR stage, which raised no concerns in relation to potential effects on functionally linked land in relation to Breckland SPA.
TJ6	Under the design principle on biodiversity net gain & nature recovery the stated aim is to deliver a measurable Biodiversity Net Gain of at least 10%. In reality this is not hard to achieve by 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	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000057-7.11_outline_Landscape_and_Ecological_Management_Plan.pdf Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], using the Government metric and associated guidance, which demonstrates that the Scheme will deliver 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. The oLEMP [APP/7.11.1] details habitat creation, monitoring and management measures and is provided as part of the DCO Application, which will become controlled through the detailed Landscape and Ecological Management Plan as a requirement of the DCO. This will ensure



Reference number	Representation	Applicant response
	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.	effective management of the proposed habitats to ensure meaningful gains for biodiversity. This provides further detail to the Biodiversity Net Gain Assessment Report [APP/7.4.1] , to demonstrate the proposed habitat types and conditions are appropriate and not misleading.
TJ7	The 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 there is a need to review this assessment.	Evidence review of the impact of solar farms on birds, bats and general ecology (NEER012) (Harrison, Lloyd, and Field, 2016), prepared by Natural England, 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>”. In particular, it is noted that the cited article (Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity, University of Stirling) identified no difference in Barbastelle (representing a rarer species recorded at the Scheme) activity between the sampling locations tested (with or without solar), which they state is consistent with another similar study, whilst mitigation measures proposed (including maintenance and enhancement of boundary vegetation) have been incorporated within the Scheme in line with the article, which itself concludes that “<i>successful mitigation measures at solar PV developments will be an opportunity to manage climate change while supporting biodiversity</i>”.
TJ8	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 approved.	Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2]. This assessment considers baseline ecological conditions and evaluates likely significant effects from the construction, operation and maintenance and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species and concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. The arable habitats within the Site were recorded to be subject to intensive arable management including regular ploughing, seeding and cropping, such that they are unlikely to represent significant opportunities for important invertebrate species, lacking in habitat complexity and variation that could support such species. In addition, the Applicant is proposing to work with the Norfolk Wildlife Trust to establish where specific reintroduction of Breckland plants and biota may be possible as part of the detailed Landscape and Ecological Management Plan, along with monitoring protocols for these and other species, along with the appropriate outcomes and reporting.
TJ9	Landscape and visual amenity 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 lost. Many people have also	ES Chapter 6: Landscape and Visual [APP/6.2.2] assesses potential landscape and visual impacts as a result of the Scheme. Potential impacts on landscape character have been assessed based on Landscape Character Types and LCAs defined within the Breckland Landscape Character Assessment (2007) and Kings Lynn and West Norfolk Landscape Character Assessment 2007 and illustrated in ES Figure 6.4: Landscape Character [APP-081]. This included an assessment of potential landscape effects upon LCA defined within ES Figure 6.4: Landscape Character [APP-081]. Castle Acre, South Acre and the wider Nar Valley are broadly included within LCA I9, F1 and G3 respectively. The assessment concludes that there are no long term significant adverse landscape effects upon these LCA. In terms of the comment regarding the “<i>very exceptional landscape of the Nar Valley and the Priory and Castle at Castle Acre</i>”, the Applicant notes that none of this area is covered by a national or local landscape designation. This area is covered under LCA I9 Little Massingham and Castle Acre, as noted within Castle Acre Neighbourhood Plan. The assessment above concludes that there are no significant landscape



Reference number	Representation	Applicant response
	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.	effects upon this LCA. The assessment also considers the 'Important Views' included within Policy HE.4 Important Views of Castle Acre Neighbourhood Plan, and where relevant, records baseline viewpoint photography from these locations, as shown within ES Figure 6.7: Visual Receptor Groups [APP-084], ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088]. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape, within the Nar Valley, around the Priory and Castle at Castle Acre, are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. The Applicant's Global Design Principle 2, "<i>environmentally led design</i>", and more specifically Project Principle 2.5 "<i>respect setting of heritage assets along the Nar Valley</i>" ensures proposed mitigation measures limit potentially adverse effects upon the landscape, within the Nar Valley, around the Priory and Castle at Castle Acre. Mitigation measures include: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRoW, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as trees, hedgerow and woodland. The minimum offsets/buffers included within the concept masterplan, from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2]. The Scheme would be offset from existing PRoW by a minimum of 15m, to respect the amenity and experience for PRoW users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRoW network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRoW network within the study area to provide recreational benefits. Potential visual effects for visual receptors located throughout the Nar Valley and Castle Acre have been considered and assessed in detail within ES Chapter 6: Landscape and Visual [APP/6.2.2], which specifically considers relevant viewpoint locations and photography situated within Castle Acre. These are shown within ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. A number of visualisations of the Scheme have been produced from viewpoints within the Nar Valley and Castle Acre, these are included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12



Reference number	Representation	Applicant response
		and PM14 Parameter Based Summer Photowires [AS-031], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039], and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-0455]. ES Appendix 6.8: Amenity and Recreation Assessment [APP-146] outlines potential effects upon users of PRow through the Site and study area. The Applicant acknowledges concerns regarding the potential effects of the Scheme on the character of the countryside, local tourism, PRow. The assessment of effects on local tourism assets in ES Chapter 14: Socio-Economics [APP-063] finds that, while some localised adverse effects on visual amenity and recreational experience may occur, particularly at assets such as Castle Acre Priory and Castle, and along certain PRow, these effects are limited in extent, not significant in EIA terms, and would reduce over time through mitigation (including landscape screening and enhancements secured through the oLEMP [APP/7.11.1]). The assessment concludes that the Scheme would not materially affect overall visitor numbers or the functioning of tourism assets. Any adverse effects would be partially offset by improvements to the PRow network, including enhanced connectivity and approximately 3.5 km of new permissive routes. As such, no significant residual socio-economic effects are anticipated on local tourism assets. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein along with potential impacts of the Scheme upon the historic environment. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be negligible at most. The chapter concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'.
TJ10	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 the statement under the environmentally led design principle that the setting of heritage assets along the Nar Valley will be respected and the 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.	The proposed mitigation planting, once established and mature, does mitigate potential significant adverse effects upon visual amenity. ES Chapter 6: Landscape and Visual [APP/6.2.2] assesses potential landscape and visual impacts as a result of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. ES Appendix 6.8: Amenity and Recreation Assessment [APP-146] includes an Amenity and Recreation Assessment (ARA) which relates to the disturbance of users of recreational resources comprising PRow (public footpaths, bridleways, restricted byways and byways open to all traffic (BOAT)), permissive footpaths, permitted access land, cycle routes, outside public recreational facilities, open access land, common land, nature reserves, public open space and water bodies used for recreation. The assessment concludes that there would be no potential long term significant adverse effects upon PRow users and accessible landscapes within the Site and wider LVIA study area. Mitigation measures within the Scheme, as set out below, serve to limit potentially adverse effects upon users of PRow and the wider Nar Valley. These mitigation measures are embedded within the Scheme as part of the Applicant's Global Design Principle 2 and more specifically Project Principles 2.5 "<i>respect setting of heritage assets along the Nar Valley</i>" and 2.9 "<i>consider experience of people using the PRow</i>". Such measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. Mitigation measures include: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some necessary loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerows and trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerows within the Site. New planting species would be native, locally prevalent and also include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRow and droves within the Site itself



Reference number	Representation	Applicant response
		- The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings - Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers included are shown within the oLEMP [APP/7.11.1], and are from existing landscape features. The details are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and - As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits.
TJ11	Safety and fire risk 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 the proposed development, exacerbates the risk. This has resulted in a very particular concern from local communities about fire risk; the proposal needs to specifically address this. Terry Jermy MP Member of Parliament for South West Norfolk	ES Chapter 13: Climate Change [APP/6.2.2] includes a review of historic rainfall at the nearest available met station and acknowledges that drier conditions and reduced precipitation may increase wildfire risk in this rural location. The Scheme incorporates mitigation measures against this possible climate change impact. As stated in the oBSMP [APP-194], there is fire suppression system on Site to rapidly action in case of fire. The systems include dedicated water storage on Site for fire suppression purposes. Additionally, the contractor will monitor weather forecasts and plan works accordingly, protecting workers and resources from any extreme weather. The significance of residual fire risk has been assessed as not significant following implementation of these measures. The BESS will be equipped by an appropriate cooling system (typically HVAC or liquid cooled) designed to handle temperatures up to 45°C and, therefore, should not be affected by the projected temperature increases in the area. While prolonged exposure to extreme heat can still challenge BESS system resilience, the area's maximum temperature in the period 1991-2020 averaged 22.53°C. To consider the risk, Met Office predictions have been used. These predictions are known as 'Representation Concentration Pathways' and there are several different methodologies and approaches used depending on different likelihoods of changes in meteorological conditions. Under the worst-case Representative Concentration Pathways (RCP 8.5) scenario, the maximum air temperature is projected to increase on average 3.8°C and a maximum of 6.8°C by 2070-2090, thereby remaining well below the 45°C design threshold. This will be secured in the detailed Battery Safety Management Plan.



7 Members of the Public

7.1 Access

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference number(s) (of respondents)	Representation	Applicant response
Recreational access	RR-059	We are a family living in South Acre with two young children, and we spend much of our free time cycling and walking in the countryside around our village and nearby Castle Acre. The quiet lanes, open fields and local footpaths are very important to us as a place where our children can safely explore nature and enjoy the outdoors.	The Applicant established a set of design principles that were used to inform the design process for the Scheme and will continue to be used during detailed design as set out within the management plans where appropriate. As set out within the Design Approach Document [AS-009], Design Principles 2.8 and 2.9 were established to recognise the importance of the local road and Public Right of Way (PRoW) network. As a result of these design principles, the Applicant has committed to: • Construction traffic routed internally through the Site from the access proposed on the A1065 • No access to the Scheme off Narford Lane • A single crossing to River Road • One access point off South Acre Road, which would be temporary, to facilitate construction of the Grid Connection Infrastructure • Minimum 15m offset to Solar PV Arrays (including security fencing) from all PRoW • Protecting the droves and limiting the number of crossing of Fincham and Petticoat to two crossings per drove • Creating 50m wide corridors along Fincham Drove and Petticoat Drove • Inclusion of noise barriers and tree belts in the vicinity of Field 27 • A general strategy for the strengthening and gapping up of hedgerows along PRoW along with new hedgerow planting • No cable runs or construction access along the Fincham nor Petticoat Drove; and • A minimum of a 15m offset from standalone Conversion Units and integrated Conversion Units / 33kV Sub-distribution Switch Rooms to PRoWs. These offsets and mitigation measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1], the oPRoWPPMP [APP-192] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.8 “<i>consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane</i>” and 2.9 “<i>consider experience of people using the PRoW</i>”. The Scheme would provide additional off-road routes through the provision of approximately 3.5km of permissive paths, allowing local communities greater opportunities to safely explore nature away in a car free environment. The oOEMP [APP/7.8.1] and the oPRoWPPMP [APP-192] require the Applicant, at the detailed design stage, to further consider the experience of people using the PRoW network. ES Chapter 6: Landscape and Visual [APP/6.2.1] outlines potential landscape and visual effects as a result of the Scheme, and this includes an assessment of the visual impact of the Scheme upon visual receptors using PRoW network both within the Site and wider surrounding study area. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area.



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference number(s) (of respondents)	Representation	Applicant response
			ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4.1] includes an Amenity and Recreation Assessment (ARA) which relates to the disturbance of users of recreational resources comprising PRow (public footpaths, bridleways, restricted byways and byways open to all traffic (BOAT)), permissive footpaths, permitted access land, cycle routes, outside public recreational facilities, open access land, common land, nature reserves, public open space and water bodies used for recreation. The assessment concludes that there would be no potential long term significant adverse effects upon PRow and accessible landscapes within the Site and wider LVIA study area.



7.2 Agriculture and soils

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
BMV / quality of land	RR-059, RR-053, RR-017, RR-063, RR-007, RR-023, RR-028, RR-041, RR-030	In addition, the site appears to include high-quality agricultural land. At a time when food security is becoming more important, I do not feel it is appropriate for large areas of productive farmland to be taken out of use for many decades	The land quality of the Order limits is described in ES Chapter 11: Soils and Agriculture [AS-018] and in ES Appendix 11.2: Agricultural Land Classification [APP-168]. The land quality is mixed, with most of the land falling into grades 2 good quality, subgrade 3a good quality and subgrade 3b moderate quality of the ALC. The distribution of these grades across the Order limits is shown on the ALC map insert at Plate 11-3 of ES Chapter 11: Soils and Agriculture [AS-018]. The amount of land by ALC grade that is affected by temporary or permanent disturbance is summarised in Table 11-7 of ES Chapter 11: Soils and Agriculture [AS-018], and amounts to 38ha of best and most versatile (BMV). The majority of this, except for 4.5ha for the National Grid Substation and Grid Connection Infrastructure, will be restored to comparable grade on decommissioning. Relevant planning policy is provided for in ES Appendix 11.1: Consultation and Legislation, Planning Policy and Guidance [APP-167]. Further, the Statement of Need [APP-042] sets out the need for the Scheme. Section 3.2 of the Statement of Need [APP-042] explains that the 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 towards 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. Paragraph 3.3.63 of both NPS EN-1 (2023) and NPS EN-1 (2025) explain that <i>"the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy"</i>. Paragraph 187(b) of the NPPF recognises the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. Paragraph 2.10.21 of NPS EN-3 (2023) recognises the preference for poorer quality land, but allows significant weight to be given to the benefits of renewable energy, even where BMV land is affected. The Policy Compliance Document [APP/5.6.1] demonstrates the Scheme's compliance with the NPPF and the relevant NPSs. The implications for food production locally and nationally are considered in ES Chapter 11: Soils and Agriculture [AS-018]. The assessment concludes that there are no dangers to food security at a global or national level, as described in Section 11.8 of ES Chapter 11: Soils and Agriculture [AS-018]. As set out in the Solar Roadmap, quoted in paragraph 11.8.103, <i>"the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly"</i>. The land under and around the panels will be managed throughout the operational phase by a combination of management techniques including grazing with sheep (as described in ES Chapter 11: Soils and Agriculture [AS-018]), as secured in the oOEMP [APP/7.8.1]. At the end of the operation phase of the Scheme, the land will be decommissioned and the solar panels and infrastructure will be removed, as described in ES Chapter 11: Soils and Agriculture [AS-018]. The land quality across the great majority of the Order limits will have been unaffected, and arable farming will be able to resume after decommissioning (except, as described in ES Chapter 11: Soils and Agriculture [AS-018], in respect of the National Grid Substation). Decommissioning will be controlled under the DCO, in accordance with the oDS [APP/7.10.1]. Overall, ES Chapter 11: Soils and Agriculture [AS-018] concludes that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production.
		Completely opposed to the solar being at that location. Good farming land	
		Putting a large-scale solar farm on high-quality agricultural land affects food security and rural economies. Solar development also degrades the land, making it less suitable for future farming and increasing the risk of it being reclassified as brownfield for housing development. the use of category 1,2,3 land is unacceptable as this is the most valuable for future food security.	
		The only concurrent agricultural use is sheep grazing which is unsustainable at current costs and not the arable crops that are needed.solar farms should be on cat 4 and 5 land only.	
		The farmland that would be given over to the industrial development is not designated as top grade, but it is of good quality enough to have been farmed for the last several hundred years, which means it is productive land – it is producing food. Farming is about land stewardship, it takes labour, planning and management. If the land becomes a solar power plant, however, the landowner will no longer have to bother with farming and keeping the land healthy and will take a profit from the development all the same, as will Island Green Power, owned by the Australian asset management firm, Macquarie.	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		Loss of Best and Most Versatile Agricultural Land. The proposal includes land classified as Grades 2 and 3a, which fall within the definition of Best and Most Versatile (BMV) agricultural land. Such land is a finite national resource and is specifically recognised in planning policy as requiring protection. The development would remove substantial areas of productive farmland from food production for decades, with some areas permanently lost to substations, infrastructure, and woodland planting. In the context of increasing pressure on domestic food systems, climate change, and geopolitical instability, the long-term loss of high-quality agricultural land raises serious sustainability concerns. Solar generation should prioritise brownfield land, rooftops, previously developed land, or lower-grade agricultural land before high-quality BMV land is taken out of production. The proposal risks setting a precedent for further loss of BMV land in Norfolk, a county whose rural economy and identity are strongly tied to agriculture. 5. The development proposes using grade 2 prime agricultural land. This is at a time when we should be making the most of our own natural resources and land production for the benefit of our economy.	Section 11.11 of ES Chapter 11: Soils and Agriculture [AS-018] considers the cumulative effects with other large-scale solar proposals and concludes that the cumulative effect is also small, around 1% of farmed land in Norfolk. Appendix 1 of the Applicant's Planning Statement [APP/5.5.1] contains the Site Evaluation Report, which details the process followed in selecting the site location, including ALC considerations that fed into this process. Paragraphs 4.4.19 - 4.4.22 detail the ALC considerations that fed into the site selection process. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] confirms that the Applicant has considered whether sufficient previously developed land (including available previously developed industrial land) would be available to develop a utility-scale solar development. The search of Breckland Council and the Borough Council of King's Lynn & West Norfolk's brownfield registers confirmed that none of the brownfield sites would have the capability of meeting the project objectives, largely due to the size of the sites. The Applicant supports the development of rooftop solar but alongside, not instead of, large-scale ground mount schemes. This is because, on their own, rooftop schemes will not deliver the required growth in new capacity to the required timelines to support the pace of carbon reduction required to hit the UK's legal targets. Section 6.3 of the Statement of Need [APP-042] provides further detail. The development of both rooftop and ground mount solar is supported in national policy at paragraph 3.3.12 of NPS EN-1 (2023 and 2025) which explains that the Government does not believe small-scale schemes, which include rooftop schemes, will replace the need for new large-scale electricity infrastructure to meet the Government's energy objectives. Section 2.10 of the Statement of Need [APP-042] explains that the Government's Solar Roadmap (2025) describes that under the Government's current energy policy scenario, 60 -65% of solar capacity installed by 2030 could be large-scale projects, further supporting the need for capacity growth in both rooftop and large-scale ground mount schemes.
Food Security	RR-053, RR-006, RR-041	Loss of farmland that could produce food for up to a million people over the 60 years lifespan. We should be minimising imports of foods to reduce environmental damage through high carbon emissions from long-distance transportation, which contributes to global deforestation and biodiversity loss, and reduces our food security by creating dependence on foreign supply chains. Areas with poor soil should be used	The potential effects on food production locally and nationally have been assessed in ES Chapter 11: Soils and Agriculture [AS-018]. There is no planning policy that requires agricultural land to be farmed for food production and as noted in paragraph 11.8.100 of ES Chapter 11: Soils and Agriculture [AS-018], and as of 1 June 2025 some 444,000 ha of arable land in the UK was in agri-environmental land use (i.e. funded for non-production uses). The Organisation for Economic Co-operation and Development and the Food Agriculture Organisation's (OECD-FAO) joint study does not predict a worldwide shortage of food over the next 10 years, as stated in paragraph 11.8.102 of ES Chapter 11: Soils and Agriculture [AS-018], nor does the UK Government. The biggest threat to food security is considered to be crop failure due to climate change, the Solar Roadmap advises, which solar farms are helping to tackle.



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		instead for generating sustainable energy. The proposed site includes land likely classified as Grades 2 and 3a, which fall under the government's definition of Best and Most Versatile (BMV) agricultural land, compromising food production and food security.	ES Chapter 11: Soils and Agriculture [AS-018] concludes that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production. Section 11.11 of ES Chapter 11: Soils and Agriculture [AS-018] considers the cumulative effects with other large-scale solar proposals and concludes that the cumulative effect is also small, around 1% of farmed land in Norfolk. Paragraph 2.10.21 of NPS EN-3 (2023) recognises the preference for poorer quality land, but allows significant weight to be given to the benefits of renewable energy, even where BMV land is affected. ES Chapter 13: Climate Change [APP/6.2.2] includes an assessment of greenhouse gas (GHG) emissions from shipping and HGV movements. This assessment assumes as a worse case that products would come from China. The overall conclusion of the assessment is that the positive effects of the Scheme on GHG outweighs the negative effect from shipping and vehicle emissions.
Loss of agricultural land	RR-059, RR-055, RR-020, RR-061, RR-060	I do not feel it is appropriate for large areas of productive farmland to be taken out of use for many decades The loss of productive farmland and cumulative impact of large-scale development in this area are unjustified. The proposal should be refused. Agriculture in the whole region will suffer as land is taken out of production rendering local Agricultural merchants unviable. Another important issue for me is the loss of productive farmland. The land proposed for this scheme appears to include high-quality agricultural land which currently contributes to food production. Removing it from use for several decades seems difficult to justify when alternative locations may exist that would have less impact on both the landscape and local communities. as well as the loss of farmland that has been part of this area for generations.	Solar farms do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. They do, however, limit opportunities for arable farming uses. The potential effects on food production locally and nationally have been assessed in ES Chapter 11: Soils and Agriculture [AS-018]. There is no policy that requires agricultural land to be farmed for food production. As noted in paragraph 11.8.100, as of 1 June 2025 some 444,000 ha of arable land in the UK was in agri-environmental land use (i.e. funded for non-production uses). There will be impacts on the wider rural economy resulting from the change from the current farming practices, but there will also be benefits. The management of sheep involves more labour per hectare than most arable cropping, and offers economic benefits for other parts of the wider rural economy. The impacts should, therefore, be considered in context. Currently, approximately 11% of arable land is not in production but is funded under agri-environmental land management schemes (444,000 ha). Overall, ES Chapter 11: Soils and Agriculture [AS-018] concludes that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production. Section 11.11 of ES Chapter 11: Soils and Agriculture [AS-018] considers the cumulative effects with other large-scale solar proposals and concludes that the cumulative effect is also small, around 1% of farmed land in Norfolk.
Continued agricultural use	RR-001, RR-033, RR-012, RR-042, RR-004, RR-024, RR-048, RR-039, RR-047, RR-034,	I also understand that solar developments can allow continued agricultural use alongside new planting and habitat creation, rather than permanently removing land from use.	These representations are correct. There is the potential for agricultural use to continue under and around the panels. This is described in ES Chapter 11: Soils and Agriculture [AS-018] , with a photograph included at Plate 11-43.



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
	RR-046, RR-032, RR-027		
Topsoil disturbance	RR-053, RR-008	This is an absolute waste of good quality farm land where food has been produced for over a 1000 years . How on earth can this farmland recover after the topsoil being removed to landfill exposing the subsoil , the whole of the battery storage area will be stripped and removed never to return and hardcore and concrete pads replacing the existing topsoil	Topsoil will generally not be disturbed by the Scheme. The installation process is described in the ES Chapter 11: Soils and Agriculture [AS-018] , in particular in section 11.8. Across the vast majority of the Order limits, the topsoil is not disturbed other than for the insertion of the mounting structure piles, which are driven in by small machinery. The land under and around the panels will not need to be disturbed for the operation of the solar farm, except for emergency repairs as described in ES Chapter 11: Soils and Agriculture [AS-018] (paragraph 11.8.74), and will be maintained under a grassland mix vegetative cover for the duration of the operation phase, as described in Section 8 of ES Chapter 11: Soils and Agriculture [AS-018] .
		Carbon emissions from the top soil being removed and disturbed.	Physical disturbance to soils is limited. During construction, soils will be disturbed only where tracks, small conversion units and cabling is involved, as detailed and quantified in ES Chapter 11: Soils and Agriculture [AS-018] and secured in the oSMP [APP/7.13.1] .
		Farmers are discouraged from ploughing and gardeners encourage to do " no dig" plots to stop the release of carbon.	There will be disturbance in the areas for the BESS and Customer Substation, as described in ES Chapter 11: Soils and Agriculture [AS-018] . The ES assumes that the BESS and Customer Substation will be removed on decommissioning, and accordingly the soil resources will be retained on Site and managed carefully for subsequent restoration. The soils will not be removed to landfill. The construction and restoration are described in the ES Chapter 11: Soils and Agriculture [AS-018] and the oSMP [APP/7.13.1] . In regard to carbon emissions, activities that do not significantly change the result of the assessment can be excluded where expected emissions are less than 1% of total emissions, and where all such exclusions total a maximum of 5% of total emissions, as per the Institute for Sustainability and Environmental Professionals (ISEP) guidance on assessing GHG Emissions and Evaluating their Significance. Top soil disturbance associated carbon emissions are expected to represent less than 1% of the total emissions associated with the Scheme.



7.3 Alternatives

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Rooftop / domestic solar	RR-059, RR-018, RR-063, RR-007, RR-023, RR-041, RR-031	particularly when solar developments could instead be directed towards lower-grade land, brownfield sites or rooftops.	NPS EN-1 (2023) states, at paragraph 2.3.3, that the Government's policy objectives for the energy system are “to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050”. The 2025 NPS maintains the same wording at paragraph 2.3.3, which further supports the Applicant's position as the policy has remained consistent in this regard.
		If I, as a private householder, can generate renewable electricity on my own roof without turning the surrounding countryside into an industrial zone, then it should be perfectly possible for government and industry to prioritise rooftop, car-park and brownfield solar before sacrificing large swathes of productive farmland and historic landscape.	Meeting this objective will require a rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure, per paragraph 2.3.5 of NPS EN-1 (2025). NPS EN-3 (2025) states, at paragraph 2.10.2, that “Solar energy is at the heart of our Clean Power 2030 Mission” and at paragraph 2.10.5 of NPS EN-3 (2025) that “Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation”. The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects such as the Scheme, and that large-scale projects are needed alongside smaller scale projects (such as rooftop, community energy schemes and microgeneration) to meet government's aim for a clean power system from 2030.
		There are thousands of acres of hospital and airport car parks whose roofs would benefit from solar panelled sheltering before we even think about every house and factory built and to be built. Perhaps this is less appealing to asset managers, but is that the point? We are guardians of the precious land of this country, it is not for us to hand it over to the bankers.	Further information on the need for both large-scale and smaller (e.g. rooftop) schemes are addressed at Section 6.2 and 6.3 of the Statement of Need [APP-042] . ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] explains the legal and policy background relevant to the consideration of alternatives and the design development of the Order limits and covers the evolution of the design of the Scheme from the identification of the initial Order limits through to the Scheme's final design. Appendix 1 of the Applicant's Planning Statement [APP/5.5.1] contains the Site Evaluation Report , which details the process followed in selecting the site location.
		6. If Solar panels were put on houses and businesses rather than prime agricultural land this could generate a very significant proportion of the energy we require. As a resident of Southacre I was told we couldn't put solar panels on our house as we are in a conservation area as our south facing aspect faces the highway. This is rather ironic, and inappropriate, to be considering a solar farm mere tens of metres away	Agricultural land quality was a key consideration in the Applicant's site selection process. As set out in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] , the Applicant has sought to identify non-BMV agricultural land in its site selection for the Scheme.
		We have been begging this government to put Solar panels on rooftops rather than on farm land.	Section 6.7 of the Statement of Need [APP-042] explains that the illustrative design for the Scheme lies within the range of land typically required per MW output (NPS EN-3 (2023), paragraph 2.10.17). It also demonstrates that the Scheme will produce no lesser a quantity of low carbon electricity per acre than would another technology which may be technically deliverable at the proposed location. The 2025 NPS maintains the same wording at paragraph 2.10.9 (NPS EN-3 (2023)) which further supports the Applicant's position as the policy has remained consistent in this regard. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme. Further, this representation goes to the merits of the NPSs, which “considers the large-scale infrastructure which will be required to ensure the UK can provide a secure, reliable, and affordable supply of energy, while also meeting our decarbonisation targets”, as per paragraph 2.1.6 of NPS EN-1 (2023) and paragraph 2.1.1 of the new NPS EN-1 (2025). Therefore, to have regard to this representation would be directly in contradiction of NPS EN-1, including paragraphs 3.2.6 to 3.2.8 of NPS EN-1 (2023), and paragraphs 3.2.9 to 3.2.11 of NPS EN-1 (2025), which make clear that the need for the Scheme is established to warrant substantial positive weight, and that there is no requirement to consider the contribution of individual projects. The determination of the DCO Application is not the means by which to challenge the provisions of the NPS, and it is for this reason that the Examining Authority (ExA) and Secretary of State (SoS) are able to disregard this representation and any similar others, pursuant to sections 87, 94 and 106 of the Planning Act 2008, during the examination of the DCO Application and when determining the DCO Application.



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Alternative technologies	RR-002, RR-063	I also encourage a broader discussion about whether current investment choices represent the most effective use of public and private resources in achieving net zero. For example, have alternative technologies or approaches, such as tidal or other lower-impact energy systems, or increased investment in research and development, been comparatively assessed?	The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects such as the Scheme, and that large-scale projects are needed alongside smaller scale projects (such as rooftop, community energy schemes and microgeneration) to meet government's aim for a clean power system from 2030. Section 2.9 of the Statement of Need [APP-042] describes the Government's clean power capacity ranges. These ranges demonstrate that an unprecedented new capacity of all low carbon generation technologies is urgently required to achieve the Government's aim to deliver a clean power system by 2030 and keep it clean thereafter. Therefore, the potential for new capacities of other technologies in this or other locations cannot be considered as alternative approaches to deliver carbon reductions, because any such capacities are likely also to be needed. The Applicant is a solar developer, and the Scheme is a large-scale solar scheme.
		We also believe that solar is an integral part of the blend of sustainable energy sources that the U.K. will need to develop in the coming years, but we cannot be convinced that this proposal represents anything but a profit grab at the cost of a special and much-loved area of farmland, fields, woods and lanes.	It is the Government's view that “a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar” (NPS EN-1 (2023), Para. 3.3.20), and that “solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation” (NPS EN-3 (2024), Para. 2.10.13). Solar is therefore expected to bring forwards affordability benefits for consumers. It is within this context that the Applicant is bringing forward these proposals. Section 3.2 of the Applicant's Statement of Need [APP-042] explains that the NPSs establish a CNP for low carbon infrastructure, including for large-scale solar farms, because of the decarbonisation, energy security, and affordability benefits that they deliver towards 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. Paragraph 3.3.63 of both NPS EN-1 (2023) and NPS EN-1 (2025) explain that “the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy”. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] explains the legal and policy background relevant to the consideration of alternatives and the design development of the Order limits and covers the evolution of the design of the Scheme from the identification of the initial Order limits through to the Scheme's final design. Due to the fast-evolving pace of Solar PV technology, the Scheme has allowed for flexibility in the design, allowing opportunity to utilise specific technology closer to construction within the parameters outlined in ES Chapter 5: The Scheme [APP/6.1.2] and the Design Approach Document [AS-009]. For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage. Environmental and heritage impacts have been assessed within each of the technical topics of the Environmental Statement (ES). The Applicant has applied the planning balance in the Planning Statement [APP/5.5.1] and considers that the identified substantial benefits of the Scheme outweigh the residual harms that would arise. Further, the CNP presumption means that these residual impacts are outweighed by the urgent need for the Scheme.
Panel efficiency and Site suitability	RR-053, RR-008, RR-020	Actual efficiency of the solar panels. Has anyone actually worked this out per solar panel to source maybe only 15 percent efficiency. Surely there are better methods of production of electricity. Five new pylons approximately and a substation approximately the size of 10 football pitches which will stay there forever once put in.	NPS EN-1 (2023) states, at paragraph 2.3.3, that the Government's policy objectives for the energy system are “to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050”. The 2025 NPS maintains the same wording at paragraph 2.3.3, which further supports the Applicant's position as the policy has remained consistent in this regard. Meeting this objective will require a rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure, per paragraph 2.3.5 of NPS EN-1 (2025). NPS EN-3 (2025) states, at paragraph 2.10.2, that “Solar energy is at the heart of our Clean Power 2030 Mission” and at paragraph 2.10.5 of NPS EN-3 (2025) that “Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation”.
		Solar panels are only 21 percent efficient at best and we do not have sufficient	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		daylight / sunlight to make these Solar panels a worthwhile project , we need at least 5 x the amount of solar panels to get the amount of power out due to the inefficiency of solar.	Chapter 6 of the Statement of Need [APP-042] provides evidence on the efficiency and output of large-scale solar schemes in comparison to other technologies. Section 8.5 of the Statement of Need [APP-042] provides an analysis of the role of solar alongside other low-carbon generation technologies in meeting Great Britain's (GB) electricity demand through the year. This is important because the Government's analysis " <i>shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar</i> ", per paragraph 3.3.20 of NPS EN-1 (2023). The 2025 NPS maintains the same wording at paragraph 3.3.23, which further supports the Applicant's position as the policy has remained consistent in this regard.
		The land predominantly faces North rendering it completely unsuitable for solar generation.	The Scheme will be a substantial infrastructure asset which, if consented, will deliver large amounts of low cost, secure, and low carbon electricity in support of the Government's energy policy aims to ensure that the national energy system always remains secure, reliable, affordable, and low carbon. Paragraph 5.1.2 of Appendix 1: Site Evaluation Report to the Planning Statement [APP/5.5.1] explains that the general topography of the available land is gently undulating, with much of the land sloping north to south, making it suitable for solar. ES Chapter 11: Soils and Agriculture [AS-018] concludes that, with embedded and additional mitigation measures in place, the Scheme itself would not result in any significant adverse effects on soil or agricultural land resources throughout its lifecycle. There will be some permanent land take associated with the National Grid Substation and Grid Connection Infrastructure, but this will amount to less than 5 ha of BMV land.



7.4 BESS

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
BESS (location)	RR-059	The size of the proposed Battery Energy Storage System and substation, along with associated fencing, lighting and construction traffic on narrow rural roads, also raises concerns about noise, visual impact and the loss of rural tranquillity for nearby communities.	ES Chapter 6: Landscape and Visual [APP/6.2.1] assesses potential landscape and visual impacts as a result of the Scheme including the BESS, Customer Substation and National Grid Substation along with associated fencing, lighting and construction traffic. Potential adverse impacts on landscape character included an assessment of the size of Scheme and perceptual impacts on landscape character, such as tranquillity. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon Landscape Character Area (LCA) D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. With regard to visual amenity, the assessment assessed the impact of the Scheme on adjacent settlements of South Acre and Castle Acre, users of long distance walking routes, cycle routes, local/rural roads and users of PRow – with the latter two assessed specifically within their respective Visual Receptor Group (VRG). The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. Offsets from nearby visual receptors have been included as part of the mitigation measures embedded within the Scheme. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.8 “<i>consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane</i>” and 2.9 “<i>consider experience of people using the PRow</i>”. These offsets and mitigation measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. ES Chapter 10: Noise and Vibration [APP-059] details the noise assessment of the Scheme, including the BESS, Conversion Units, and the Customer Substation. The assessment includes noise modelling of all noise-emitting equipment based on worst-case assumptions (all operating together at 100% capacity) and outlines mitigation measures, such as acoustic barriers, buffer separation distances, and screening/enclosures where required, to achieve the appropriate criteria and non-significant effects. The assessment includes construction noise, traffic noise, and effects on PRow as well. The noise assessment, with these worst-case assumptions and mitigation measures, concludes that noise and vibration residual effects are not significant.



7.5 Biodiversity

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Biodiversity	RR-059, RR-063, RR-007, RR-023, RR-028	Developers often argue that solar farms can coexist with biodiversity, but the scale of this proposal makes that unlikely. A patchwork of small wildflower strips cannot compensate for the wholesale loss of open land across two thousand acres. Norfolk is a county already under pressure from intensive agriculture, rising housing demand, and climate change. To sacrifice still more of its scarce breeding ground for ground-nesting birds is to push species like the curlew closer to local extinction.	Ecological and biodiversity matters represented a key theme of the Scheme from the early stage engagement and project design and, as such, has been considered throughout the design process in order to ensure the design reflects identified ecological constraints and considerations at the Site and maximises available opportunities for realistic biodiversity enhancement. The Statement of Need [APP-042] and Planning Statement [APP/5.5.1] clearly set out why the Scheme is urgently required and at the proposed scale. Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. This assessment considers baseline ecological conditions and evaluates likely significant effects from the construction, operation and decommissioning phases of the Scheme. Specific consideration is included in regard to potential effects on nearby designations including the River Nar Site of Special Scientific Interest (SSSI). The assessment includes consideration of potential direct effects on the River Nar SSSI (which is located beyond the Site), along with potential for indirect contamination (e.g. through overland flows). It identifies avoidance, mitigation and enhancement measures to address potential impacts on ecological designations (including the River Nar SSSI), habitats, and protected and notable species.
		Renewable energy is vital, but it must not come at the expense of equally urgent biodiversity goals. Norfolk's wide skies and open fields are more than scenery: they are lifelines for rare birds. Once lost, these habitats cannot simply be recreated.	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/7.6.1]. These include, but are 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 (see ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]).
		There are also environmental concerns in relation to biodiversity and the nearby River Nar SSSI. The scale of the development could lead to habitat disruption for farmland and ground-nesting birds and may fragment local wildlife networks. I am particularly worried about the potential effects during the construction phase.	The vast majority of the hedgerows and trees are retained within the Scheme, along with all of the woodlands, with any removal of hedgerows anticipated to be limited to minor widening of existing gaps to enable appropriate access. Further, the Scheme includes a large amount of new hedgerow planting and enhancement of existing hedgerows. In addition, large buffers to the hedgerows, comprising wildflower grassland, and trees are included within the Scheme design to ensure their protection. Veteran trees are entirely retained and protected within the Scheme. Wildflower grassland, along with appropriate management, is proposed within the Solar PV Site, which will replace the existing intensively arable land. These measures are secured through the oLEMP [APP/7.11.1], oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1], by Requirements 7, 13, 14, and 20 respectively in Schedule 2 to the draft DCO [APP/3.1.1].
		Great claims are made for these installations being good for biodiversity, but this area already has great biodiversity. It's not subject to large-scale farming. The land is peppered with woods, hedges, ancient trees and wonderful, wide (drover's) verges. When we look at the solar arrays (perhaps more appropriately sited) bordering the A11, there is only grass below them, not a flower, not a sheep – nothing.	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 biodiversity net gain (BNG) well in excess of 10%, as measured using the government metric (Biodiversity Net Gain Assessment Report [APP/7.4.1]), and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme, the implementation of which is secured by Requirement 9 in Schedule 2 to the draft DCO [APP/3.1.1]. The provision of buffers and new ecological habitats are established within the measures to be adhered to are set out within the oCEMP [APP/7.6.1]. Biodiversity benefits and gains are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects.



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		Biodiversity and Ecological Impacts The scheme would create an extensive fenced block of infrastructure across open countryside. Of particular concern is the reduction by area and nature of mitigation and ecological buffer areas compared with earlier iterations of the proposal. As mitigation proposals have been significantly scaled back, so has confidence in the claimed biodiversity benefits.	



7.6 Climate

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Carbon Lifecycle	RR-053	The actual use of all the materials needed to make the solar factory components. Is it all from the UK or are air miles being added to the carbon emissions.	The materials and components are likely to be sourced from different countries, including overseas. ES Chapter 13: Climate Change [APP/6.2.2] considers a reasonable worst-case scenario when accounting for the GHG emissions that arise from the shipping of materials. As stated in paragraph 13.4.13 of ES Chapter 13: Climate Change [APP/6.2.2], GHG emissions for the shipping of materials were estimated assuming the country of origin for all materials will be China. The GHG assessment within ES Chapter 13: Climate Change [APP/6.2.2] assumes sea freight as the transport mode for all products, which also includes the associated land transportation required. This represents a reasonable worst-case assumption, as where components may be sourced from closer locations (such as EU-manufactured inverters or UK-based suppliers), this would reduce emissions compared to the assessment assumptions. The assessment explicitly excludes air freight from all material transportation. Air freight is not expected to be required at any stage for material transportation except in very rare circumstances where a critical component is required at speed. Emissions from all potentially significant sources have been considered within ES Chapter 13: Climate Change [APP/6.2.2]. The conclusions of the GHG assessment show that the Scheme will be beneficial with regards to climate change and the positive effects of the Scheme with regards to total GHG emissions would outweigh any associated with development of the Scheme.
Energy transition	RR-002	In particular, I would welcome clearer public information on the lifecycle carbon assessment of this project, including emissions associated with manufacturing, transport, installation, soil disturbance, maintenance, and end-of-life disposal of panels and associated infrastructure. Without this analysis, it is difficult for communities to understand the true carbon balance or long-term sustainability of the scheme.	ES Chapter 13: Climate Change [APP/6.2.2] assesses GHG emissions across the full life cycle of the Scheme, including the embodied carbon associated with materials and components, transport of materials, installation, operation, maintenance and decommissioning of Scheme. This assessment includes the Scheme emissions considering a reasonable worst-case scenario, as well as operation phase emissions savings arising from renewable electricity generation. The assessment concludes that, while there are GHG emissions associated with the construction, operation, maintenance and decommissioning of the Scheme, these are outweighed over time by the carbon savings achieved by the Scheme's contribution towards the grid decarbonisation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to net zero. The assessment of end-of-life waste disposal and estimated recycling rates in Section 16.9 of ES Chapter 16: Other Environmental Matters [APP-065] demonstrates the quantity and proportion of onsite materials that are likely to be able to be reused or recycled, resulting in no greater than a slight adverse effect to waste void capacity at decommissioning, which is not a significant effect. This supports the assessment in ES Chapter 13: Climate Change [APP/6.2.2], which estimates the likely GHG emissions from decommissioning activities account for less than 0.3% of the total GHG emissions of the Scheme and are therefore not significant effects. Together, these assessments demonstrate the likely end-of-life impacts from the Scheme are not anticipated to give rise to any significant adverse effects. Furthermore, the Applicant is committed to ensuring that waste and material use is minimised across all phases of the Scheme to reduce the embodied GHG emissions of the Scheme overall. These measures are secured through the oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1], by Requirements 13, 14, and 20 respectively in Schedule 2 to the draft DCO [APP/3.1.1]. With regard for soil disturbance, measures to control soil handling, storage and reinstatement are set out in the oSMP [APP/7.13.1], which is secured via Requirement 17 of the draft DCO [APP/3.1.1]. The oSMP [APP/7.13.1] provides the framework for detailed soil management methods to be implemented during construction, operation, maintenance and decommissioning phases, ensuring that soil structure, quality and function



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
			are protected and restored. ES Chapter 11: Soils and Agriculture [AS-018] recognises that the installation of the mounting structure piles for the solar arrays involves very limited disturbance to the land as the piles are simply pushed into the ground. ES Chapter 11: Soils and Agriculture [AS-018] describes the limited amounts of land that are disturbed for the construction process. During the operation and maintenance phase, the land cover will be undisturbed with benefits for soils including for soil organic carbon (see paragraphs 11.8.78 to 11.8.86 to ES Chapter 11: Soils and Agriculture [AS-018]).



7.7 Cultural Heritage

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Below ground archaeology	RR-061, RR-053, RR-020, RR-060, RR-008,	I am also concerned about the potential impact on archaeology in the area. The Nar Valley is known to contain remains from Roman, Saxon and medieval periods, and the amount of ground disturbance required for panel supports, cabling, access tracks and substations could risk damaging or destroying currently unknown archaeological features.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is supported by: ES Appendix 8.3: Archaeological Desk-Based Assessment [APP-153], ES Appendix 8.4: Geophysical Survey Report [APP-154 to APP-158], ES Appendix 8.5: Air Photo Services Report [APP-159] and ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160] which, together, present a detailed assessment of the known and potential archaeology within the Site. The assessment has assessed the potential impact of the Scheme on archaeological assets and, where required, appropriate mitigation has been secured in ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161]. The assessment concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, and all residual adverse effects constitute 'less than substantial harm'. ES Chapter 6: Landscape and Visual [APP/6.2.1] outlines potential landscape and visual impacts as a result of the Scheme and this included an assessment of landscape character informed by the value of designated assets, including heritage and publicly accessible heritage assets which formed part of Visual Receptor Group 5. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon landscape and visual amenity are outlined below, and are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principle 2.5 "respect setting of heritage assets along the Nar Valley". Mitigation measure include: - Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access - Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site - In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself - The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRoW, roads and residential dwellings
		This project will blight the landscape where there numerous Medieval remains to be seen and enjoyed,	
		There are hundreds if not thousands of archaeological remains underneath the topsoil which will be damaged due to piling and removal of the topsoil and also the environmental release of CO2 once the topsoil starts to be removed. This is an environmental disaster .	
		Norfolk is one of the highest areas for historical finds.	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
			- Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site; and - As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the Study Area to provide recreational benefits. In regard to soil disturbance, measures to control soil handling, storage and reinstatement are set out in the oSMP [APP/7.13.1], which is secured via Requirement 17 of the draft DCO [APP/3.1.1]. As described in ES Chapter 11: Soils and Agriculture [AS-018], the installation of the mounting structure piles for the solar arrays involves very limited disturbance to the land as the piles are simply pushed into the ground. ES Chapter 11: Soils and Agriculture [AS-018] describes the limited amounts of land that are disturbed for the construction process. ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161] sets out the strategy for mitigating impacts arising from the Scheme on archaeological features present and concludes that there will be no significant effects.
Historic character	RR-053, RR-040, RR-063, RR-060, RR-028, RR-005, RR-055, RR-020, RR-061, RR-009, RR-049,	Historical area with Roman , medieval etc the area needs to be protected for the future. I object to the Drovers Solar Farm proposal due to its harmful impact on the rural landscape and the historic setting of Castle Acre. The scale and industrial nature of the development would erode the character of open countryside and harm the significance of nearby heritage assets I recognise the need for renewable energy, but this should not be used as a blanket justification for siting large industrial schemes in the settings of important heritage landscapes and well-used recreational routes. In this location, the harm to the character and experience of Castle Acre, South Acre and the Nar Valley is, in my view, far greater than any local benefit. I therefore urge you to refuse consent for The Drovers Solar Farm.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057], supported by ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152], presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein and has assessed the contribution of the Site to designated heritage assets in the surrounding area along with potential impacts of the Scheme upon the historic environment. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the significance of these designated heritage assets (including the siting of transportation routes, temporary Construction Compounds, substations and BESS to be unobstructive to the settings of heritage assets, gapping up and reinforcing hedgerows and planting of shelter tree belts, and removal of Field 35 from any built development and incorporating setbacks in Field 33) are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be low/negligible at most. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'. The Applicant has applied the planning balance in the Planning Statement [APP/5.5.1] and considers that the identified substantial benefits of the Scheme outweigh the residual harms that would arise. Further, the CNP presumption means that these residual impacts are outweighed by the urgent need for the Scheme. ES Chapter 6: Landscape and Visual [APP/6.2.1] outlines potential landscape and visual impacts as a result of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		The character of the neighbouring historic village of Castle Acre with its Norman castle and Abbey will be permanently destroyed. The historical nature of the area should not be overlooked. As the developer's presentation shows, this is a human landscape interspersed with scheduled monuments, listed buildings, veteran trees, historic parkland and conservation areas. South Acre is a small and historic village and we do not feel that a development of this size is suitable so close by. The area around Castle Acre and South Acre contains a number of important heritage sites, including Castle Acre Priory and the historic route of the Peddars Way. These are enjoyed not only by residents but by walkers and visitors from further afield. The introduction of large-scale solar infrastructure into their setting risks changing the character and experience of these places in a way that would be difficult to reverse. The experience of approaching and understanding them in an open agricultural landscape is part of their heritage value. Introducing a large industrial energy scheme into this setting would erode that historic context. Even if the harm is categorised as “less than substantial,” it must still be clearly justified and convincingly outweighed by public benefit. Also the site is of historical and archaeological interest and enhances the natural beauty of this unspoiled area of Norfolk. I also have heard that it won't even generate enough power to supply a small town such as Swaffham	Mitigation measures are embedded within the Scheme to limit potentially adverse effects upon the landscape and these are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.5 “<i>respect setting of heritage assets along the Nar Valley</i>”, 2.8 “<i>consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane</i>” and 2.9 “<i>consider experience of people using the PRow</i>”. Mitigation measure include: - Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access - Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site - In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRow and droves within the Site itself - The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings - Setting back the Scheme from key landscape features within and adjacent to the Site, such as trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site and this would enhance biodiversity within the Site; and - As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. Potential visual effects for visual receptors along the Peddars Way and Norfolk Coast Path and also those located within South Acre and Castle Acre have been considered and assessed in detail within ES Chapter 6: Landscape and Visual [APP/6.2.1]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors along the Peddars Way and Norfolk Coast Path and also those located within



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
			South Acre and Castle Acre. This assessment specifically considers relevant viewpoint locations and photography situated along the Peddars Way and Norfolk Coast Path and within Castle Acre and South Acre, which are shown within ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088]. The visual assessment has also been supported by viewpoints 8, 12 and 14 included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. ES Chapter 6: Landscape and Visual [APP/6.2.1] also considers landscape character in the context of Castle Acre, South Acre and the Nar Valley. Notable elements of value within the surrounding landscape are detailed within ES Appendix 6.5: Evaluation of Landscape Value [APP-143]. As outlined above, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. LCA D1 is situated adjacent to both the settlement of South Acre and LCA F1 River Nar Valley. The location of landscape character areas within the study area are shown on ES Figure 6.4: Landscape Character [APP-081]. There are no potential long term significant adverse landscape effects beyond the Order limits, such as around Castle Acre. There are no potential long term significant effects upon LCA F1 River Nar Valley. As set out in the Planning Statement [APP/5.5.1], the average medium usage household uses 2,700 (kWh) of electricity per year, the Scheme could provide enough electricity to power around 57,346 homes per year. This represents a significant contribution towards the delivery of the government's energy objectives and the target of net zero by 2050.
Scheduled monuments and historic sites	RR-040, RR-028, RR-030 RR-057, RR-041,	I wish to comment on the impact on the historic sites at Castle Acre Priory, Castle, and Bailey Gate, and the surrounding landscape such as the floating water meadows. I strongly object to the proposed Drovers Solar Farm. Castle Acre and South Acre form one of Norfolk's most distinctive historic clusters. The Norman castle and bailey, the Priory, Bailey Gate, St James' Church, St George's Church and the earthworks at Dyke Hills are all part of a wider cultural landscape which includes the Nar Valley, its fields, woods and lanes. Visitors do not experience these sites in isolation: they arrive through open countryside, along the Peddars Way and Nar Valley Way, and gain a sense of a	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is supported by: ES Appendix 8.3: Archaeological Desk-Based Assessment [APP-153], ES Appendix 8.4: Geophysical Survey Report [APP-154 to APP-158], ES Appendix 8.5: Air Photo Services Report [APP-159] and ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160] which present a detailed assessment of the known and potential archaeology within the Site and have assessed the potential impact of the Scheme on archaeological assets, and where required appropriate mitigation has been secured in ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161]. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is also supported by ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152], which has assessed the contribution of the Site to designated heritage assets in the surrounding area. In many cases, the assessment has found that there is no shared 'experience' of the heritage assets from the bulk of the Site, and where meaningful 'experience' is available built elements of the Scheme have been excluded in order to reduce or remove any impact. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the significance of these designated heritage assets (including the siting of transportation routes, temporary Construction Compounds, substations and BESS to be unobstructive to the settings of heritage assets, gapping up and reinforcing hedgerows and planting of shelter tree belts, and removal of Field 35 from any built development and incorporating setbacks in Field 33) are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] and the associated assessments conclude that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'. The archaeological context of the study area, including Bartholomews Hills, has been assessed in ES Appendix 8.3: Archaeological Desk-Based Assessment [APP-153]. The desk-based assessment (DBA) notes the large



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		long-inhabited valley where history and landscape are intertwined.	assemblage of prehistoric lithics recovered during quarrying activity at Bartholomew's Hills and concludes that there is high potential for prehistoric remains to be present within the Order limits. The potential impact of the Scheme on archaeological assets is detailed within ES Chapter 8: Cultural Heritage and Archaeology [APP-057], and where required appropriate mitigation has been secured in ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161] to ensure that archaeological remains present are appropriately preserved in line with their significance. Following embedded (e.g. siting of elements of the Scheme away from archaeologically sensitive areas) and additional (see ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161]) mitigation, there will be no significant effects on the archaeological resource. It should also be noted that the Peddars Way and Norfolk Coast Path National Trail does not fully follow the full course of the former roman road and that the stretch between Southacre Road to the northwest of Sporle and Bailey Street at Castle Acre (including the stretch along Big Wood Lane) deviates from the course of the roman road which lies circa 1km further to the east (as shown in Figure 4 of ES Appendix 8.3: Archaeological Desk-Based Assessment [APP-153]). Views of designated heritage assets from the Nar Valley Way generally do not include the Site and will not be impacted by the Scheme. ES Chapter 6: Landscape and Visual [APP/6.2.1] outlines potential landscape and visual impacts as a result of the Scheme and more specifically the floated water meadows which fall outside of the Order limits and within LCA I9 Little Massingham and Castle Acre. The assessment concludes that there are no potential long term significant adverse landscape effects beyond the Order limits, including LCA I9 Little Massingham and Castle Acre. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. Mitigation measures include: - Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and Study Area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access; - Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site; - In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider Study Area, and from PRoW and droves within the Site itself;
		not to mention protected sites of historical significance.	
		Heritage and Setting The proposed development sits within the wider setting of important heritage assets in Castle Acre and South Acre, including Castle Acre Priory, Castle Acre Castle, Church of St James, Castle Acre and St George's Church, South Acre. These sites are not isolated monuments; they form a coherent medieval landscape whose significance is closely tied to their rural setting within the Nar Valley.	
		4. Bartholomews Hills, where there is projected to be a substation, is of huge archaeological interest. Previous archaeological excavations have found flints dating back to the palaeolithic period, and a hand axe from the Bronze age. It was also the site of a medieval leper hospital and cemetery. Losing this historic site, which is adjacent to the aforementioned Peddars Way does not appear to be a measured decision. It is likely there are other significant archaeological remains/treasure trove in this whole area, given the heritage of Peddars way, Southacre and Castle Acre, whether this be from Roman, Anglo Saxon or Norman eras. Full surveys of the whole area should be undertaken prior to any development being considered.	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		The proposed solar farm lies within the setting of multiple designated heritage assets, including: • Castle Acre Priory (Scheduled Monument) • Castle Acre Castle (Scheduled Monument) • Bailey Gate (Scheduled Monument) • St James the Great Church (Grade 1 listed) • The historic route of the Peddars Way (parts of which are a scheduled monument as it was a Roman Road and later used by pilgrims travelling to the medieval shrine at Walsingham. It is now a National Trail).	• The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings; • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured in the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the Study Area to provide recreational benefits. Potential visual effects for visual receptors including visual receptors located within South Acre and Castle Acre have been considered and assessed in detail within ES Chapter 6: Landscape and Visual [APP/6.2.1]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area.



7.8 Cumulative impact

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Cumulative impact	RR-059, RR-031, RR-009, RR-028	Finally, I do not believe the application has adequately considered the cumulative impact of this proposal alongside other existing or planned energy infrastructure in the local area. Taken together, these developments risk progressively industrialising what is currently a valued historic landscape.	The assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations¹¹ and the Planning Inspectorate's advice note on Cumulative Effects Assessment¹². The approach to cumulative assessment is detailed in ES Chapter 2: EIA Process and Methodology [APP-051] and ES Appendix 2.4: Cumulative Schemes [APP-136]. Cumulative assessments within each of the technical topic chapters have been undertaken in accordance with the relevant topic specific guidance and best practice approach, assessing a reasonable worst-case scenario. The assessment of likely cumulative effects concludes the following significant residual adverse effects: • Landscape and Visual: ○ E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the Scheme with High Grove Solar; and ○ VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the Scheme with High Grove Solar. • Noise and Vibration: ○ The Off Barn: there are significant adverse effects across the operational phase of the Scheme cumulatively with High Grove Solar. However, the cumulative effects assessment concludes that it is likely that noise levels can be controlled through the implementation of additional mitigation measures to suitable levels at 'The Off Barn' receptor when considered cumulatively with the neighbouring High Grove Solar Farm, such that residual levels would represent at most a minor impact, which is considered not significant, in EIA terms. • Soils and Agriculture: ○ BMV Land: there are significant adverse effects across the decommissioning phase of the Scheme cumulatively with High Grove Solar, East Pye Solar, Norfolk Vanguard Offshore Windfarm onshore elements and Norfolk Boreas Offshore Windfarm onshore elements. The assessment of likely cumulative effects also concludes that there are the following significant residual beneficial effects: • Socio-Economics: Provision of education, skills and training: there are significant beneficial effects across all phases of the Scheme cumulatively with High Grove Solar. • Human Health: Provision of education, skills and training for the General Population: there are significant beneficial effects across the construction phase of the Scheme cumulatively with High Grove Solar. ES Appendix 2.4: Cumulative Schemes [APP-136] presents the methodology for selecting cumulative schemes, as well as presenting the schemes considered for assessment as part of the cumulative effects assessment within the
		The cumulative size of The Grovessolar Farm and High Grove is I am informed approximately 825 Hectares. I am aghast at what can only be described as The Industrialisation of this exceptionally tranquil and historic corner of West Norfolk.	
		Finally, I feel that the wider cumulative impact of this development, alongside other energy projects already operating or proposed in the area, has not been fully addressed. There is a real concern that the gradual addition of multiple schemes could fundamentally change the rural character of this part of the Nar Valley.	
		This proposal must also be assessed in its cumulative context. The Nar Valley and surrounding area have already experienced incremental energy development, including Pickenham Wind Farm, Burntstorks Solar Farm, High Grove Solar Farm, Great Friars Thornes Biogas Plant. When considered individually, each scheme may claim limited impact. Collectively, however, they represent progressive industrialisation of a historically sensitive valley landscape.	

¹¹ HM Government, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

¹² Planning Inspectorate, Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (September 2024)



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		The cumulative assessment presented does not appear to take a sufficiently strategic view of this sequential change. The result is landscape fragmentation and erosion of rural character over time. National policy requires proper consideration of cumulative effects, particularly where development risks transforming the essential character of a valued landscape. In this instance, that threshold is in danger of being crossed.	ES. Table 2-3 of this appendix contains the details of the selected schemes, which includes High Grove Solar (EN0110010). All cumulative schemes have been considered, as relevant and appropriate, in the technical chapters of the ES. Developments that are built out and operational are not considered as part of the cumulative assessment, in line with the methodology presented, as they form part of the existing baseline against which the effects of the Scheme in isolation have been assessed. Pickenham Wind Farm has been operational since approximately 2006, Burnstalks Solar Farm has been operational since approximately 2013, and Great Friars Thornes Biogas Plant has been operational since approximately 2017.. Nar Valley and sensitive receptors within the Nar Valley have been identified and assessed as part of the cumulative effects assessment in ES Chapter 6: Landscape and Visual [APP/6.2.1] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The chapters and associated documents conclude that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'.



7.9 Trust in the developer

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Trust in developer	RR-018, RR-063, RR-007, RR-023	The Drovers proposal does the opposite: it burdens a quiet rural area with a development whose benefits and profits flow mainly elsewhere. For these reasons – the direct visual impact on my home, the harm to the setting of Castle Acre and South Acre, and my opposition to speculative, profit-led “green” energy schemes that treat the countryside as a resource to be monetised – I ask the Examining Authority and the Secretary of State to refuse consent for The Drovers Solar Farm. Yours faithfully, Dennis Pedersen	ES Chapter 6: Landscape and Visual [APP/6.2.1] outlines potential landscape and visual impacts as a result of the Scheme and assessed the landscape and visual impacts on South Acre and Castle Acre. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. The assessment also considered landscape character in the context of Castle Acre and South Acre. The assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. LCA D1 is situated adjacent to the settlement of South Acre. The location of landscape character areas within the study area are shown on ES Figure 6.4: Landscape Character [APP-081]. There are no potential long term significant adverse landscape effects beyond the Order Limits, such as around Castle Acre. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within IGP Global Design Principle 2 and more specifically Project Principles 2.5 “<i>respect setting of heritage assets along the Nar Valley</i>” and 2.7 “<i>respect residential amenity</i>”. Mitigation measure include: - Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access - Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site - In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself - The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRoW, roads and residential dwellings - Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured in the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRoW by a minimum of 15m, to respect the amenity and experience for PRoW users along existing routes and allow for the sowing of extensive areas
		This is a lazy and destructive way to profit from land, and it's extraordinary to think that some of this profit from our quiet and unassuming part of the country should go to Australia where they have no relationship with it at all. The site is not an asset to be maximised or a line on a multi-national company's spreadsheet; this is one of the few unspoiled deep rural areas left in this country, one that generations of the same families have grown up enjoying and knowing as home. From the developer's perspective, it is presumably more profitable to start with the clean sheet of a large open field than a brownfield site, but we cannot lose our rural landscape to these developments.	



		of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. Potential visual effects for residential dwellings within the study area have not only been considered and assessed in detail within ES Chapter 6: Landscape and Visual [APP/6.2.1], but also considered in more detail as part of a Residential Visual Amenity Assessment (RVAA), included as ES Appendix 6.7: Residential Visual Amenity Assessment [APP-145]. The RVAA focuses solely on private views and private visual amenity. The assessment concludes that the Residential Visual Amenity threshold would not be reached for any properties within the study area. Effects on all properties would not be sufficiently “oppressive” or “overbearing” that any property would be rendered an unattractive place in which to live. The other matters raised in regard to the Scheme being part of ‘speculative profit-led “green” energy schemes’ have been addressed in other sections of the Applicant’s response to these Relevant Representations. The Planning Statement [APP/5.5.1] sets out the rigorous process that the Applicant undertook to select the Site including the consideration of environmental constraints. This is detailed within Appendix 1: Site Evaluation Report of the Planning Statement [APP/5.5.1]. The Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors. ES Volume 1, Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] and Planning Statement [APP/5.5.1] (Appendix 1 Site Evaluation Report) explains the methodology that has been applied when identifying and evaluating potential sites for the Scheme. The Site Evaluation Report identifies a number of potential development areas for the Scheme and present how each of those areas perform against a range of planning, environmental and operational constraints and opportunities. The Report concludes that there are no more suitable and/or available locations within the search area than the proposed location for the Scheme, based on the criteria identified. Further, and as described in the Statement of Need [APP-042], the Government is seeking a large capacity of new low carbon schemes to come forwards to prioritise projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 towards meeting net zero by 2050. The urgent and unprecedented requirement for new large scale solar schemes supports the view that any other suitable and available sites, if such sites had been found, would likely also be needed. The Funding Statement [AS-005] details the corporate structure of the Applicant, setting out that it is a registered company in England and Wales and its parent company Island Green Power Limited is UK tax resident.



7.10 Energy transition

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Energy transition	RR-053, RR-002, RR-001, RR-033, RR-012, RR-042, RR-004, RR-024, RR-048, RR-039, RR-047, RR-034, RR-046, RR-032, RR-027, RR-063	We are passionate supporters of the necessary transition that our society must urgently make from fossil fuels to green energy sources. We recognise the climate emergency and have made many steps in our own lives to reduce our carbon footprint.	The Applicant welcomes the many comments in these Relevant Representations in support of the transition towards a clean energy system to reduce carbon emissions including those relating to the benefits arising from the Scheme to support reliable, locally generated power and the need for full and transparent assessment of local and environmental impacts (both benefits and harms) as are relevant for the planning process. The Applicant agrees and submits that this approach has been taken at the Scheme, as is described following. NPS EN-1 (both 2023 and 2025 versions) state, at paragraph 2.3.3 of each, that the policy objectives for the energy system are <i>“to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050”</i> .
		I support the UK’s commitment to achieving net zero and recognise the need to transition away from fossil fuels. However, I believe it is important that large-scale solar developments are evaluated transparently against their full environmental and economic impacts.	Meeting this objective will require a rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure, per paragraph 2.3.5 of NPS EN-1 (2025). NPS EN-3 (2025) states, at paragraph 2.10.2, that <i>“Solar energy is at the heart of our Clean Power 2030 Mission”</i> and at paragraph 2.10.5 that <i>“Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation”</i> .
		My intention in raising these points is constructive: to ensure that the transition to clean energy is not only necessary, but also evidence-based, locally sensitive, and aligned with long-term environmental and economic resilience.	NPS EN-1 (2023) explains, at paragraph 3.3.20, that Government’s analysis shows that <i>“A secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar”</i> . This conclusion is retained at NPS EN-1 (2025) paragraph 3.3.23. NPS EN-3 (2023) explains, at paragraph 2.10.9, that <i>“solar is a key part of the government’s strategy for low-cost decarbonisation of the energy sector”</i> and in NPS EN-3 (2025) at paragraph 2.10.5, that because <i>“solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation”</i> , solar is also expected to bring forwards affordability benefits for consumers. Chapter 8 of the Statement of Need [APP-042] provides evidence that the Scheme would contribute to GB electricity system security of supply. The Scheme is therefore aligned with long-term economic resilience.
		I live in Norfolk, using the local roads and footpaths and keeping an eye on what’s happening in the countryside around us. Like many people here, I care deeply about how our landscape is treated, but I’m also very aware of how exposed we are to rising energy costs and uncertainty about where our electricity comes from	The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects such as the Scheme, and that large-scale projects are needed alongside smaller scale projects (such as rooftop, community energy schemes and microgeneration) to meet government’s aim for a clean power system from 2030. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme.
		Those concerns should be taken seriously. At the same time, I see clear benefits. Energy bills affect day-to-day life in Norfolk just as much as anywhere else, and large-scale solar generation in the East of England can play a practical role in providing more reliable, locally generated power.	The assessment of environmental and socio-economic impacts associated with the Scheme has been an evidence-based undertaking, utilising up-to-date baseline data, industry guidance, and best practice methods to comprehensively understand impacts. Assessed receptors have been identified based on their potential to experience likely significant effects from the Scheme, which includes, but is not limited to, locally sensitive receptors such as residential properties, local residents, PRoW, historic buildings and landscapes, road users, and ecological habitats and species. The Design Approach Document [AS-009] , provides an overview of the design framework and demonstrates how good design aspirations and intentions have cascaded through the Scheme which will be secured as good design outcomes within the detailed design of the Scheme. Section 6 and 7 of the Design Approach Document [AS-009] explain how the design principles have been applied in the design evolution of the Scheme. The ES submitted as part of the DCO Application contains the full detail of the assessments undertaken, methodologies used, surveys undertaken, receptors identified, impacts assessed, and mitigation identified. The process has sought to reduce the level of effects experienced as a result of the Scheme, with any remaining significant effects presented in ES Chapter 18: Summary of Effects [APP-067] .



7.11 Ecology

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Arboriculture	RR-052	Trees crucial to mankind, and ditches running with water vital to all life.	The Applicant agrees with this comment.
Ecology (general)	RR-057, RR-063, RR-007, RR-023, RR-061, RR-060, RR-030	This is in an area of the countryside with many animals and birds, Part of the joy of the farmed landscape is seasonal change – earthy brown fields metamorphose into crowded hosts of green and golden crops before harvest time and a stubbled landscape that is returned to rich, ploughed soil. This would be eliminated by solar panels that do not respond to the changing weather, do not attract some creatures in one season and others at another and that come summer, autumn, spring or winter remain unchangingly, implacably grey. A dreary proposition. The historical nature of the area should not be overlooked. As the developer's presentation shows, this is a human landscape interspersed with scheduled monuments, listed buildings, veteran trees, historic parkland and conservation areas. Further documents in the application pack describe the priority bird species that breed on the site – 53 species of Birds of Conservation Concern – and then the bats, badgers, reptiles and newts that also live there. The landscape is broken down into its component types: sites of special scientific interest, special protection areas, county wildlife sites, roadside nature reserves and ancient replanted woodland. We are also worried about the effect on local wildlife and birds that use these fields, As a large-scale solar farm taking up 825 hectares of agricultural land, it risks displacing birds from their natural habitats and is particularly detrimental to ground-nesting birds and species that rely on open fields for foraging such as lapwing, skylark,	ES Chapter 6: Landscape and Visual [APP/6.2.1] outlines potential landscape and visual impacts as a result of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. This assessment considers baseline ecological conditions and evaluates likely significant effects from the construction, operation, maintenance and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. Mitigation measures embedded within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. Mitigation measure include: - Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access - Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site - In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself - The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRoW, roads and residential dwellings



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		yellowhammer, corn bunting and turtle dove, all species that are on the Birds of Conservation Concern Red List.	- Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and - As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein along with potential impacts of the Scheme upon the historic environment. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be negligible at most. concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'. Design principles seek to retain and enhance connectivity of habitat (through hedgerow planting for example), retention and enhancement of Marl Pits, ponds, and substantial areas of mitigation land in respect of ground nesting birds, all secured in the oLEMP [APP/7.11.1]. New habitat creation will include grassland, scrub, and attenuation features. The vast majority of the hedgerows and trees are retained within the Scheme, along with all of the woodlands, with any removal of hedgerows anticipated to be limited to minor widening of existing gaps to enable appropriate access. Further, the Scheme includes a substantial amount of new hedgerow planting and enhancement of existing hedgerows. In addition, large buffers to the hedgerows, comprising wildflower grassland, and trees are included within the Scheme design to ensure their protection. Veteran trees are entirely retained and protected within the Scheme with associated buffers. Wildflower grassland, along with appropriate management, is proposed within the solar areas. These measures are secured through the oLEMP [APP/7.11.1], oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1], by Requirements 7, 13, 14, and 20 respectively in Schedule 2 to the draft DCO [APP/3.1.1]. 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/7.6.1]. These include, but are 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 (see ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]).
Light pollution	RR-052, RR-030	. With light pollution from security cameras, neither daylight nor darkness will ever again carry the same vital cycle of all living creatures. The impact of operational and security lighting from the proposed solar farm is an additional concern, adversely affecting the quality of our night skies and their value to nocturnal wildlife.	The Design Principles, Parameters and Commitments [APP/5.8.1] confirms that “the Solar arrays will not be lit during the operational phase”, such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects are set out within the oCEMP [APP/7.6.1].



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Loss of biodiversity / ecological loss	RR-059, RR-053, RR-052, RR-061, RR-060, RR-019, RR-030	There are many, many reasons this project is a bad idea, but for the purposes of this registration let's focus on one. A proposal to cover 2,000 acres (in fact, 4,000, with the project on the other side of the B1065) of rural Norfolk with solar panels must be weighed not just against energy needs, but against the irreplaceable ecological cost. Disruption to the wildlife as thier habitat gets bulldozed and they are made homeless. (watership down springs to mind) We are also concerned about the possible impact on wildlife and the loss of open farmland that has always been part of this community. For myself, a Southacre resident with a life long involvement in nature conservation, can you please register my request to have this industrial solar complex & massive substation blocked on the grounds of the negative impact on the incredible biodiversity & biodiversity restoration potential of the Nar Valley (which already has SSSI status) & the unique Breckland habitat of this area. The proposal risks habitat fragmentation, biodiversity loss, and increased surface runoff — all of which are contrary to the Environment Act 2021 and emerging Local Nature Recovery Strategies.	Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], using the Government metric and associated guidance, which demonstrates that the Scheme will deliver 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. The majority of the hedgerows and trees are retained within the Scheme, along with all of the woodlands, with any removal of hedgerows anticipated to be limited to minor widening of existing gaps to enable appropriate access. Further, the Scheme includes a large amount of new hedgerow planting and enhancement of existing hedgerows. In addition, large buffers to the hedgerows, comprising wildflower grassland, and trees are included within the Scheme design to ensure their protection. Veteran trees are entirely retained and protected within the Scheme. Wildflower grassland, along with appropriate management, is proposed within the solar areas. These measures are secured through the oLEMP [APP/7.11.1], oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1], by Requirements 7, 13, 14, and 20 respectively in Schedule 2 to the draft DCO [APP/3.1.1]. Design principles seek to retain and enhance connectivity of habitat (through hedgerow planting for example), retention and enhancement of Marl Pits, ponds, and large areas of mitigation land in respect of ground nesting birds, all secured in the oLEMP [APP/7.11.1]. New habitat creation will include grassland, scrub, and attenuation features. A full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in Sections 7.7 and 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. Embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse are secured through the oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1], by Requirements 13, 14, and 20 respectively in Schedule 2 to the draft DCO [APP/3.1.1]. With specific regard to potential for increased surface runoff, ES Chapter 12: Water Resources [APP-061] includes specific assessment of measures in regard to overland flows and runoff rates/volume, concluding that there will be no likely significant effects. Construction measures are secured through the oCEMP [APP/7.6.1] and by Requirement 13 in Schedule 2 to the draft DCO [APP/3.1.1]. The inclusion of permanent grassland vegetation beneath solar panels (as secured through the oLEMP [APP-191] and Requirement 7 in Schedule 2 to the draft DCO [APP/3.1.1]). As set out within ES Chapter 12: Water Resources [APP-061], once fully established, this vegetation will likely result in a decrease in surface water runoff rates and a reduction in potential for sediment and agricultural chemicals to transfer to the hydrological catchment compared to the baseline scenario. In regard to habitat fragmentation and biodiversity loss, the retention of key habitats and corridors including hedgerows and tree lines has been incorporated into the scheme and is secured through the oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1], by Requirements 13, 14, and 20 respectively in Schedule 2 to the draft DCO [APP/3.1.1], whilst embedded mitigation includes additional hedgerow and tree line planting and strengthening of existing corridors, secured through the oLEMP [APP/7.11.1] and Requirement 7 in Schedule 2 to the draft DCO [APP/3.1.1], resulting in Minor to Major Beneficial effects on these habitats and resultant connectivity. Accordingly, in line with this and the above considerations relating to BNG using the Government metric it is clear that the Scheme is fully in line with the relevant aims and requirements of the Environment Act 2021 or the Local Nature Recovery Strategy (now published) and would not be contrary to these documents.
Protected sites (i.e. SSSIs, Conservation areas)	RR-009, RR-019	I am also concerned about the impact on local wildlife and habitats, particularly given the proximity of the River Nar, which is a protected chalk stream. The scale of the development, and the amount of land involved, could disturb farmland bird	A full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in Sections 7.7 and 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which conclude that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. Embedded mitigation measures to safeguard the River Nar, such as specific measures to stop spillages entering the watercourse are secured through the oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1], by Requirements 13, 14, and 20 respectively in Schedule 2 to the draft DCO [APP/3.1.1].



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		populations and other species that rely on these fields.	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/7.6.1] . These include, but are 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 (see ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]).
Species concerns	specific RR-059, RR-019, RR-028	These wide, open landscapes are among the last breeding grounds for the Eurasian curlew – one of the UK's most threatened bird species, now RED-LISTED due to catastrophic population declines. Curlews require expanses of quiet, damp grassland and arable margins where they can lay their eggs in shallow ground scrapes. The loss or fragmentation of such habitat through industrial development is a direct threat to their survival	Potential impacts on ground nesting birds, including Eurasian curlew, are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that, following the implementation of the embedded mitigation (for example clearance of potential bird nesting habitat outside of bird nesting season) and additional mitigation proposed, there will be no adverse likely significant effects, and indeed no offence under the legislation. A Ground Nesting Bird Strategy has been prepared to fully mitigate potential impacts on these species (see ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]), which identifies measures and habitat provision to address potential impacts on these species, including in particular the Red Listed species Eurasian Curlew (for which a total of 2 probable breeding pairs was recorded at the Site during the surveys, with such use dependent on the presence and specific location of suitable cropping, which would vary from year to year. As such, the Scheme will not result in the loss of significant areas of habitat used by this species.
		For many of us in villages such as South Acre, one of the most distinctive signs of spring and early summer has always been the soundscape: curlews bubbling overhead, oystercatchers peeping insistently as they patrol the fields. These calls once defined the season, a reminder that life was returning to the land. Yet even within my own lifetime here, those voices have grown fewer and fainter, an unmistakable sign of how vulnerable these birds have become	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/7.6.1] . These include, but are not limited to, measures to control noise, light, and pollution. Design principles 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/7.11.1] . New habitat creation will include grassland, scrub, and attenuation features.
		Curlews are not alone. Lapwings, skylarks, meadow pipits, and oystercatchers also rely on these fields and meadows to nest and rear their young. These birds evolved to thrive in open, low-disturbance landscapes. A vast solar installation – with its infrastructure of fencing, cabling, access roads, and substations – fundamentally alters the character of the countryside. Once installed, these panels create shade where none should exist, displace wet grassland, and attract higher densities of predators that exploit the altered habitat.	A full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in Sections 7.7 and 7.8 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. Embedded mitigation measures to safeguard the River Nar, such as specific measures to stop spillages entering the watercourse are secured through the oCEMP [APP/7.6.1] , oOEMP [APP/7.8.1] , and oDS [APP/7.10.1] , by Requirements 13, 14, and 20 respectively in Schedule 2 to the draft DCO [APP/3.1.1] . Impacts of the Scheme on priority habitats and species have been fully considered within Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects.
		Endless construction projects seem to be held up or cancelled because of endangered bats or newts found on site, and yet the fact they seem to be at every	The level of survey work undertaken at the Site in regard to Stone Curlew has been accepted by the statutory body (being Natural England), who state in their Relevant Representation “ <i>We concur with the conclusion of the Shadow Habitats Regulations Assessment (SHRA) (APP/7.3) that likely significant effects on European sites can be ruled out, either alone or in combination with other plans or projects, and that there is therefore no need to progress to Stage 2 Appropriate Assessment.</i> ”. As such, further survey work is not required. The operational area of the Scheme will be enclosed within perimeter fencing; however, dispersal impacts on wildlife, including mammals such as hare and deer, are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation, as detailed within Section 7.7 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] and secured within Design Principles, Parameters and Commitments [APP/5.8.1] .



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		site rather implies they aren't actually endangered at all. And yet here we have a project actively looking to destroy 4,000 acres of the habitat or a critically-endangered Red-List species. That is wilfully destructive behaviour. Of highest import, we have very strong evidence that the Schedule 1 protected Stone Curlew, which has had multiple sightings in the area of this planned industrial scale solar complex - sightings in both 2024 & 2025, is already breeding & therefore the Drovers solar farm cannot legally proceed under these circumstances. The unique Breckland area (which includes habitat here to the south of Southacre & Castle Acre) is all part of the Breckland national stronghold for this incredibly rare British breeding bird. In addition, the Nar Valley SSSI and this area of Breckland has incredible biodiversity. We have Harvest Mice, Otters, Polecats, Badgers, Stoats, Weasels & Red Deer. There are other national rarities such as Purple Emperor butterflies breeding in the Nar Valley. Over 30 species of butterfly have been recorded in Southacre - half the British butterfly list ! There are many scarcer birds, flora inc. orchids, & rare insects eg. solitary bee species which are present & will be potentially eradicated by the building & presence of such a massive solar farm & substation project. Ravens appear to be breeding in the area of the planned solar farm. Quail have been heard in the same area. Please can you respond to my concerns & confirm that you are looking seriously into the legal requirement to protect these Southacre-area Stone Curlews ? The RSPB have also previously submitted on this Drovers project & stated that a minimum of 3 years of Stone Curlew survey work should be enacted before any decisions are	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		made about this industrial scale solar project. Please can you also confirm that this RSPB submission is being put into action ?	
		Ground-nesting farmland and migratory birds are especially vulnerable to large-scale construction activity over multiple seasons. Disturbance during breeding periods could lead to displacement and reduced success. Once operational, extensive fencing may fragment habitats and restrict movement.	
		There is also concern about the displacement of mammals such as hares and deer. The Nar Valley currently provides relatively open corridors for wildlife movement. A heavily fenced landscape risks creating barriers, pushing wildlife into smaller areas and increasing pressure on surrounding land. In a valley already experiencing cumulative development, ecological resilience should be strengthened, not diminished, and mitigation should be enhanced and secured, not reduced.	



7.12 Noise

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Noise	RR-053, RR-035, RR-030	Noise pollution who wants to live near a constant hum , not me or the bats and birds.	ES Chapter 10: Noise and Vibration [APP-059] presents the noise and vibration impact assessment for the Scheme at the nearby receptors with consideration of the local acoustic environment. The assessment concludes residual effects are not significant in EIA terms and this includes consideration for any potential tonal ‘hum’ from the equipment and adds an appropriate (+2dB) penalty to the predicted levels to account for the perception of the noise impact in practice, and is also based on worst-case assumptions, such as all equipment (including the substations, solar conversion units, and BESS) operating simultaneously and at 100% capacity, which is unlikely to be the case in practice. Therefore, noise levels in practice are likely to be lower than those predicted in the assessment, which (in any event) are concluded to be not significant. The chapter also includes assessment of noise on the droves public right of way, and mitigation (separation distances for solar conversion units and acoustic barriers along battery energy storage system area) is outlined in the chapter to reduce noise levels to achieve non-significant effects on the public rights of way. ES Chapter 10: Noise and Vibration [APP-059] also details the construction noise assessment, which includes piling works for the solar panels in the Solar PV Arrays. ES Appendix 10.3: Construction and Noise Modelling [APP-166] outlines distances to nearest receptors from closest point of piling works; Table 10.3.1 shows that with the exception of Keppers Cottage, all other receptors will experience noise levels below the lowest criterion threshold. Furthermore, this level will only be experienced for a short duration at the closest point and will reduce as the piling work moves away from the respective receptors to areas further within the Scheme over the 2-year construction period; as such, these levels will not be experienced for the duration of the construction period and are short-term worst-case only. Construction works will also be limited to the hours defined within the oCEMP [APP/7.6.1]. As such, no construction noise will be produced in the evenings (i.e. after 18:00 on weekdays, 13:30 on Saturdays, or anytime on Sundays) during the typical amenity periods where the tranquil environment may be enjoyed. These working hours will be in the detailed Construction Environmental Management Plan and secured via a DCO requirement. As noted in ES Appendix 2.2: Scoping Opinion Response [APP-134], noise is not assessed as a standalone effect within ES Chapter 15: Human Health [APP-064]. Instead, ES Chapter 15: Human Health [APP-064] considers the effect of construction-related factors, including noise, dust, vibration and visual disturbance, on physical activity. ES Chapter 15: Human Health [APP-064] identifies that while users of PRow may experience temporary disturbances (including short-term increases in noise) when passing close to construction works, these effects are transient and not significant in isolation. The assessment concludes that there will be no permanent loss of PRow, and any temporary closures or diversions will be short-term and managed through mitigation measures secured in the oCEMP [APP/7.6.1]. While there may be some temporary deterrence to PRow use, the overall capacity for physical activity in the local area remains largely unchanged. Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. The assessment considers baseline ecological conditions and evaluates likely significant effects from the construction, operation, maintenance and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. ES Chapter 6: Landscape and Visual [APP/6.2.1] assesses potential landscape and visual impacts as a result of the Scheme, including BESS and the substations along with associated fencing, lighting and construction traffic.
		The droves will now be walking through a factory with high solar panels either side instead with a hum from the batteries instead of the countryside and stress reducing wildlife sounds.	
		2 Noise disturbance to local population as pile drivers are used on support pylons during 2 years of project construction	
		The solar farm will create residual noise, particularly from the sub-station; the battery storage, inverters and fans. With a two - year construction timescale, the noise generated by piling for the panels; by the installation of the associated infrastructure and from construction traffic is unacceptable in this rural and tranquil landscape	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
			Potential adverse impacts on landscape character included an assessment of the size of Scheme and perceptual impacts on landscape character, such as tranquillity. The assessment assessed the impact of the Scheme on adjacent settlements of South Acre and Castle Acre, users of long distance walking routes, cycle routes, local/rural roads and users of public rights of way. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.



7.13 Objections to the Scheme

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
General objection	RR-059, RR-057, RR-063, RR-007, RR-023, RR-061, RR-060, RR-009, RR-019, RR-028, RR-049, RR-059,	For these reasons, I respectfully request that the Examining Authority and Secretary of State refuse consent for the Drovers Solar Farm proposal. Yours faithfully, Tom Barber South Acre resident	The Applicant notes these objections and has responded to the specific points contained within across the other tables in this response document. Details of what the Scheme will comprise are set out within the DCO Application, but specifically the plans, drawings and documents under Part 2 [APP-007 – APP-017] provide further information on what is being proposed in terms of physical features and constraints. ES Figure 5.1: Concept Masterplan [APP/6.3.2] illustrates the Scheme, with the various elements of the proposals overlaid across the Order limits.
		I am writing on behalf of my husband Tim Marlow and myself to object to the Drovers Farm proposal. Whilst we agree that much needs to be done to ensure a transition to greener energy we do not agree with the proposals which interestingly do not provide a proper or details outline of what this will look like	
		This will be incredibly disruptive and we urge you to reconsider. Tanya Hudson and Tim Marlow	
		My husband, Antony Gormley, and I are writing to object to the plans that you are currently examining for The Drovers Solar Farm, near Swaffham in Norfolk.	
		My wife, Vicken Parsons, and I are writing to object to the plans that you are currently examining for The Drovers Solar Farm, near Swaffham in Norfolk.	
		For these reasons, I respectfully request that the proposed development consent for the Drovers Solar Farm be refused. Yours faithfully, Davina Barber South Acre resident [Address] South Acre	
		There are multiple very strong reasons why this industrial scale solar farm project should be stopped. These have been very clearly laid out and submitted to you by the Castle Acre Parish Council (Tim Hubbard etc al.) - Castle Acre PC is representing Southacre residents as we do not have our own parish council.	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		Relevant Representation – The Droves Solar Farm, Swaffham, Norfolk. I am submitting this representation in objection to the proposed Droves Solar Farm. I object for the reasons laid down by Anthony Gormley in his letter Dear Sir/Madam, We are writing to object to the proposed Droves Solar Farm. We have lived in South Acre for almost all of our lives and care very deeply about the countryside and wildlife around our village and nearby Castle Acre. For these reasons, we respectfully ask that consent for the Droves Solar Farm be refused. Yours faithfully, Wendy & Royal Eggleton South Acre Dear Sir/Madam, I am writing as a resident of South Acre to object to the proposed Droves Solar Farm development. I can see no benefit for such an upheaval to the local communities. Dear Sir/Madam, I am writing to formally object to the proposed Droves Solar Farm development near Swaffham. I understand and support the need for renewable energy, however I do not believe this particular proposal represents an appropriate or sustainable location for a project of this scale	
Objection	RR-063, RR-007, RR-023, RR-028	The nearest larger town is over 12 miles away. This area is deep in rural Norfolk, and not the appropriate context for this enormous industrial development. This part of the country is unspoilt, unchanged for	The Scheme has been designed to deliver the greatest possible practicable benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. This includes avoiding impact on SSSI, of which the River Nar is one such site, and has been designed to reduce impact on scheduled and historic monuments. This approach to minimising impact on the surrounding area and taking into account



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		hundreds of years and many of the people here are still working with the land as they have for generations. The application documents prepared by Island Green Power are numerous and full of jargon, with few renders of what the scheme will actually look like. Taken as a whole, we might believe that the solar farm would be almost invisible in both summer and winter, result in a boost to local biodiversity and that the disturbance to local people through the construction of the facility would be negligible to non-existent. The area proposed for development is vast. Over more than 3 square miles, it includes sites of special scientific interest, important historic monuments, rewilded woodland and a rare chalk stream, one of only 200 worldwide. Swaffham is a small market town with lovely villages dotted around the surrounding countryside. Taken together, these impacts suggest that this is not the right development in the right place. I respectfully ask the Examining Authority to give very careful consideration to the cumulative landscape, agricultural, ecological and heritage harms identified above before reaching a decision.	environmental constraints including ecology and heritage is detailed within Appendix 1: Site Evaluation Report of the Planning Statement [APP/5.5.1]. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. The need for the Scheme is set out in the Statement of Need [APP-042]. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein along with potential impacts of the Scheme upon the historic environment. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be negligible at most. concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'. Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. This assessment considers baseline ecological conditions and evaluates likely significant effects from the construction, operation, maintenance and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], using the Government metric and associated guidance, which demonstrates that the Scheme will deliver 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. Effects on soils and agriculture are assessed in ES Chapter 11: Soils and Agriculture [AS-018]. This assessment concludes that there is no significant effect or cumulative effect on the availability of agricultural land or on food production, and there is the potential for food production to continue alongside the Scheme's renewable energy generation.



7.14 Human health

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Human Health	RR-053	World health authority suggests no one should live within 2 km of a solar factory. This is not the case at The Drovers or High Grove sites with parts of Swaffham, castle Acre, South Acre etc etc being within this guidelines. Why doesn't anyone care?	The World Health Organization (WHO) has reviewed the available scientific evidence on this issue and acknowledges that a range of symptoms have been reported.¹³ However, it concludes that “<i>to date, scientific evidence does not support a link between these symptoms and exposure to electromagnetic fields. At least some of these health problems may be caused by noise or other environmental factors, or by anxiety related to the presence of new technologies</i>”. The evidence reviewed by the WHO does not identify any specific distance at which health effects occur, with conclusions based instead on measured exposure levels. ES Chapter 16: Other Environmental Matters [APP-065] details that Electromagnetic Field (EMF) radiation is scoped out of the EIA, as the EMF levels are predicted to be below International Commission on Non-Ionizing Radiation Protection reference levels for magnetic fields. It is therefore unlikely that EMF radiation would lead to significant effects on human health and is therefore scoped out of further assessment as agreed with PINS. While the evidence indicates that no adverse human health effects are expected, it is recognised that perceived risks associated with EMF exposure can influence mental wellbeing, primarily through anxiety or stress (as discussed in Paragraph 15.5.7 of ES Chapter 15: Human Health [APP-064]). Such perceived effects are generally linked to uncertainty or lack of information rather than exposure itself. In response, the Applicant will provide clear information to the public on EMF levels and compliance through the Community Liaison Group (see the oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1]). Impacts to residential receptors as a result of the Scheme have been assessed throughout the ES in each of the technical chapters, as relevant to the effects being assessed. As part of this process, mitigation measures to reduce adverse impacts have been identified and adopted and are secured across the suite of management plans listed above. Any remaining significant effects have been reported in ES Chapter 18: Summary of Effects [APP-067]. A summary of the ES in non-technical jargon has been provided, per the requirements of the EIA Regulations, at Non-Technical Summary [AS-055].

¹³ WHO, 2016. Radiation: Electromagnetic fields



7.15 Land use

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Change in land use	RR-028	The proposed scheme, covering over 800 hectares, would introduce extensive solar arrays, substations, battery storage, security fencing and access tracks into this open countryside. However it is described, this represents a major industrial change in land use.	The Applicant acknowledges that the land use will change from mostly agricultural to a mixed use involving the generation of renewable energy, biodiversity management and agricultural use. This will be for a time-limited period. The land will be managed for bio-diversity benefits potentially including the grazing of sheep (an agricultural use), coupled with renewable energy generation, and will not be an industrial use. The Statement of Need [APP-042] explains that the proposed location is appropriate for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in timeframes compatible with the government's aims, coupled with sufficient solar irradiance, and a suitable area of secured land for the proposed solar and BESS. Landscape effects are addressed in the table below.



7.16 Landscape and visual impact

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Landscape character / visual impact	RR-028, RR-059, RR-053, RR-040, RR-018, RR-020, RR-063, RR-007, RR-023, RR-061, RR-060, RR-060, RR-009, RR-030, RR-053	One of my main concerns is the impact the development would have on the landscape surrounding Castle Acre, South Acre and the Nar Valley. This is currently an open rural area with significant historical importance, and forms part of the setting for well-known heritage assets such as Castle Acre Priory, Castle Acre Castle, the Bailey Gate and the historic Peddars Way. The proposal would introduce large-scale industrial infrastructure into what is currently a peaceful and historic environment. I feel this would permanently change the character of the area for residents and visitors alike, particularly for those using public footpaths and national trails such as the Peddars Way and Nar Valley Way.	ES Chapter 6: Landscape and Visual [APP/6.2.2] assesses potential landscape and visual impacts as a result of the Scheme. Embedded mitigation measures, as described below, within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.5 “<i>respect setting of heritage assets along the Nar Valley</i>”, 2.8 “<i>consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane</i>” and 2.9 “<i>consider experience of people using the PRoW</i>”. Mitigation measure include: - Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access - Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site - In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRoW and droves within the Site itself - The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRoW, roads and residential dwellings - Setting back the Scheme from key landscape features within and adjacent to the Site, such as the droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameters and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRoW by a minimum of 15m, to respect the amenity and experience for PRoW users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and - As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRoW network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRoW network within the study area to provide recreational benefits.
		Destruction of the landscape.	
		This proposal feels driven by profit and asset-management priorities rather than by a careful search for the most appropriate sites, technologies and scales. The land around Castle Acre and South Acre is not an empty canvas waiting to be filled. It is a historic, working landscape that contributes directly to the setting of Castle Acre Castle, the Priory, Bailey Gate, the churches and the Peddars Way.	
		The sense of arrival – travelling through open fields and lanes into this cluster of heritage assets – is part of what makes the place special. Replacing that approach with a patchwork of fenced compounds, panels, tracks and a battery storage facility would fundamentally change the character of the valley and the experience of living here.	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		There will be a major visual impact on an otherwise unspoilt and beautiful countryside. Whilst this is a happy thought, it is not true. Because solar 'farm' is a misnomer – this is an 839-hectare industrial development of aluminium, steel, glass, silicon and concrete where now there are open fields and woodland. The 'photography panels' included in the application cleverly show very little visual change as a result of the development, but these are 'key views' and give no indication of the impact that will be seen and – importantly – felt by local residents who enjoy this landscape, those who walk, run, ride and work here. The application documents prepared by Island Green Power are numerous and full of jargon, with few renders of what the scheme will actually look like. Taken as a whole, we might believe that the solar farm would be almost invisible in both summer and winter, result in a boost to local biodiversity and that the disturbance to local people through the construction of the facility would be negligible to non-existent. We are very worried that a development of this size, including solar panels, battery storage, fencing and new infrastructure, would permanently damage the landscape that makes this area so special. It would change the rural character of the Nar Valley and reduce the enjoyment of local routes such as the Peddars Way for families like ours. One of the reasons we have stayed here is because of the peace, open views and natural beauty of the Nar Valley.	Potential visual effects for visual receptors located within South Acre, Castle Acre, wider Nar Valley as well as PROW users of the Peddars Way and Norfolk Coast Path and Nar Valley Way have been assessed within ES Chapter 6: Landscape and Visual [APP/6.2.1]. ES Chapter 6: Landscape and Visual [APP/6.2.1] specifically considers relevant viewpoint locations and photography situated along the Peddars Way and Norfolk Coast Path and Nar Valley Way and also within Castle Acre and South Acre – all of which are shown within ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088]. A number of visualisations of the Scheme have been produced from viewpoints situated within Castle Acre and along the Peddars Way and Norfolk Coast Path, these are produced for viewpoints 8, 12 and 14 and included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. The photograph panels, included within ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088], are not visualisations. These are documents that include photography of the baseline conditions of the Site and study area, showing what the existing view in both winter and summer seasons. The visualisations have been produced for a number of key locations which demonstrate both the maximum parameters of the Scheme (i.e. 'Photowires'), as included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031], and also 'Photomontages' which demonstrate an illustrative view of what the Scheme could look like following detailed design, included within ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. With regard to 'permanence' and the duration of the Scheme, the potential landscape and visual impact of the Scheme has been assessed over a number of different durations. The Scheme is not permanent. The longest assessment duration is 'long term' which is defined as <i>"The change is expected to be in place for more than 25 years"</i> within ES Chapter 6: Landscape and Visual [APP/6.2.1], which details any potential long term adverse landscape and visual effects. It is noted that the mitigation screening planting does not change the fact that there would be a change in land use, however it does serve to mitigate the perception of change in land use and presence of the Scheme in views from nearby visual receptors, once fully mature. The mitigation screening planting also reinforces the landscape fabric and green infrastructure within the Site and local landscape. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. The potential impact of the Scheme upon the local landscape is included within ES Chapter 6: Landscape and Visual [APP/6.2.1]. The assessment outlines potential landscape effects upon LCA shown within ES Figure 6.4: Landscape Character [APP-081]. Castle Acre, South Acre and the wider Nar Valley are broadly included within LCA I9, F1 and G3 respectively. The assessment concludes that there are no long term significant adverse landscape effects upon these LCA. Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. This assessment considers baseline ecological conditions and evaluates likely



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		We are very concerned that such a large solar farm, together with the battery storage, fencing, tracks and other equipment, would change the character of this area completely. It would turn what is currently open farmland into something much more industrial in nature, which we feel would be harmful to the landscape and to the enjoyment of local footpaths such as the Peddars Way.	significant effects from the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] explains the legal and policy background relevant to the consideration of alternatives and the design development of the Order limits and covers the evolution of the design of the Scheme from the identification of the initial Order limits through to the Scheme's final design. Due to the fast-evolving pace of Solar PV technology, the Scheme has allowed for flexibility in the design, allowing opportunity to utilise specific technology closer to construction within the parameters outlined in ES Chapter 5: The Scheme [APP/6.1.2] and the Design Approach Document [AS-009]. For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage.
		While I appreciate the importance of moving towards renewable energy, I am very concerned about the impact that a project of this scale would have on the immediate surroundings of our village and the wider Nar Valley landscape.	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein along with potential impacts of the Scheme upon the historic environment. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be low/negligible at most. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects.
		South Acre is a very small rural community and its character is closely linked to the surrounding open countryside. The proposed solar farm, along with the associated infrastructure such as substations, battery storage, access tracks and fencing, would represent a significant industrial development within what is currently a quiet and historic setting. I am particularly worried about how this would affect views into and out of the village, as well as the general sense of openness that defines this part of Norfolk.	ES Chapter 10: Noise and Vibration [APP-059] presents the noise and vibration impact assessment from the Scheme at the nearby receptors, with consideration of the quiet local acoustic environment. The assessment has been based on stringent criteria relative to existing background, and with consideration to absolute levels to reflect an appropriate impact criterion for the area. While predicted noise levels may be perceptible, they are expected to be non-intrusive and at a level unlikely to cause disturbance or dominate the acoustic character of the area. The assessment shows non-significant effects at all receptors and public rights of way based on these strict limits and worst-case assumptions (e.g. all plant infrastructure running at 100% simultaneously) which will not occur in practice; therefore, noise impacts are likely to be even lower than those predicted in the assessment (which concludes non-significant impacts in any event).
		Landscape Character and Cumulative Industrialisation. The Nar Valley is not an empty or anonymous landscape. It is a quiet, open and historically coherent valley whose character derives from its simplicity, agricultural use and long continuity.	The qualifications and experience of the EIA coordinators, responsible for coordinating and reviewing the Environmental Statement, and technical leads for each discipline are set out in ES Appendix 1.1: Statement of Competence [APP-132].
		The Landscape and Visual Impact Assessment appears to rely heavily on screening and proposed planting to suggest that effects can be mitigated. Screening does not address the fundamental and permanent change in land use from open agricultural	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		countryside to a fenced, engineered energy complex with substations, BESS infrastructure, access roads and security features. The industrialisation of such a wide area cannot be “planted away.” The visual and experiential harm caused by the scale, fencing, and infrastructure of the proposed solar farm would damage the landscape of one of Norfolk's most important heritage locations and archaeological sites. It would install visually intrusive infrastructure into an open, rural landscape that contributes to the village's identity and attracts visitors. Having grown up in countryside do not want to live next to an industrial unit. Visual pollution , from rolling countryside to a solar factory.	
Light pollution	RR-053	Light pollution, this is a dark skies area .	The Applicant notes in ES Chapter 5: The Scheme [APP/6.1.2] and the oOEMP [APP/7.8.1] 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. The design of any security lighting would also be sensitive to the local dark skies’ environment. ES Chapter 5: The Scheme [APP/6.1.2] states that lighting is not required within the Solar PV Site during the operation phase of the Scheme. As detailed within the oOEMP [APP/7.8.1], all routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. ES Chapter 5: The Scheme [APP/6.1.2] and the oOEMP [APP/7.8.1] states that temporary site lighting would be used during construction to enable safe working during construction in hours of darkness or where natural lighting is unable to reach (such as sheltered/confined areas). Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the Construction Compounds while construction is underway. With regard to dark skies, ES Chapter 6: Landscape and Visual [APP/6.2.1] paragraph 6.7.23 states that “<i>it is not considered likely that that the Scheme would result in any significant effects through additional lighting.</i>” Regarding operational lighting, the Scheme would not conflict with NPPF Para 198 (c) or the Dark Sky Policy in Castle Acre’s Neighbourhood Plan (adopted 2022) - Policy NE.4 Dark Skies. The Scheme limits light spillage and eliminates all unnecessary forms of artificial outdoor lighting, as defined within the oOEMP [APP/7.8.1].
PRoW and access	RR-040, RR-041	I am writing as a resident of Castle Acre who uses the surrounding lanes and footpaths daily, and who values the village for its unique combination of heritage and landscape.	The Scheme will increase public access/amenity within the Site as referred to within the oLEMP [APP/7.11.1] , recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRoW network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRoW network within the study area to provide recreational benefits.



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		The proposed solar farm would insert a large industrial energy complex directly into this setting. For walkers, riders and residents, the approach to Castle Acre would shift from a tranquil, largely agricultural scene to one dominated by fencing, access tracks, panels and electrical infrastructure. The character of nationally promoted routes such as the Peddars Way would be fundamentally altered, with a corresponding impact on recreation and tourism. People come here for a sense of space, quiet and historical continuity; that is precisely what this scheme would erode	ES Chapter 6: Landscape and Visual [APP/6.2.1] assesses potential landscape and visual impacts as a result of the Scheme. Embedded mitigation measures, as set out below, within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.5 “<i>respect setting of heritage assets along the Nar Valley</i>”, 2.7 “<i>respect residential amenity</i>”, 2.8 “<i>consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane</i>” and 2.9 “<i>consider experience of people using the PRow</i>”. Mitigation measure include: • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRow and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. Potential visual effects for visual receptors located within Castle Acre as well as PRow users of the Peddars Way and Norfolk Coast Path have been considered and assessed in detail within ES Chapter 6: Landscape and Visual [APP/6.2.1]. ES Chapter 6: Landscape and Visual [APP/6.2.1] specifically considers relevant viewpoint locations and photography situated along the Peddars Way and Norfolk Coast Path and also within Castle Acre – all of which are shown
		2. The development is projected to be alongside part of The Peddars Way, one of only 13 National Trails in England. This is a major landmark walking route of national importance. The Romans made this roadway in AD 61, so it is of huge historic significance. It is a beautiful scenic walk, which attracts many tourists to our wonderful Norfolk countryside. It is unlikely walkers will want to see a huge solar farm, and therefore tourism to the area will suffer greatly.	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
			within ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP-087] and ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP-088]. A number of visualisations of the Scheme have been produced from viewpoints situated within Castle Acre and along the Peddars Way and Norfolk Coast Path, these are produced for viewpoints 8, 12 and 14 and included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP-089], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]. The assessment assesses the impact of the Scheme on adjacent settlements of South Acre and Castle Acre, users of long-distance walking routes, cycle routes, local/rural roads and users of PRow – with the latter two assessed specifically within their respective Visual Receptor Group (VRG). The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. Potential adverse impacts on landscape character included an assessment of the Scheme and perceptual impacts on landscape character, such as tranquillity. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. It should also be noted that the Peddars Way and Norfolk Coast Path National Trail does not fully follow the full course of the former roman road and that the stretch between Southacre Road to the northwest of Sporle and Bailey Street at Castle Acre (including the stretch along Big Wood Lane) deviates from the course of the roman road which lies circa. 1km further to the east (as shown in Figure 4 of ES Appendix 8.3: Archaeological Desk-Based Assessment [APP-153]).
Views from property	RR-018	The Drovers Solar Farm, Swaffham, Norfolk – Objection I am a resident of Castle Acre and live in (REDACTED) overlooking the Nar Valley. Because of the height and position of my home, I have expansive views across the surrounding countryside in several directions. Under the Drovers Solar Farm proposals, those views would be dominated by solar panels and associated infrastructure spread across the landscape The change would be dramatic and permanent: instead of a varied agricultural scene and open countryside, I would look out over an industrial energy installation. I want to stress that I am not opposed to solar power. I have already installed 17 solar panels on the roofs of my own property, and I support the shift from fossil fuels to renewables. What I object to is the way schemes like this use the language of “green” energy to justify industrialising large areas of rural land, primarily for commercial gain	As set out in the Statement of Need [APP-042], an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission, per NPS EN-3 (2025) paragraphs 2.10.1 and 2.10.2. The Statement of Need [APP-042] confirms that the need for the Scheme is urgent and that substantial weight should be given to this, per NPS EN-1 (2023) paragraphs 3.2.9 and 3.2.10. The Applicant notes the concerns about the motivations behind the Scheme. The Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. ES Chapter 6: Landscape and Visual [APP/6.2.1] assesses potential landscape and visual impacts as a result of the Scheme. Embedded mitigation measures, as described below, within the Scheme to limit potentially adverse effects upon the landscape are secured by the Design Principles, Parameters and Commitments [APP/5.8.1], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.5 “<i>respect setting of heritage assets along the Nar Valley</i>” and 2.7 “<i>respect residential amenity</i>”. Mitigation measure include: - Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access - Offset and buffering of the Scheme with new woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
			• In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRow and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [APP/7.11.1]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [APP/6.1.2] and secured within the Design Principles, Parameter and Commitments [APP/5.8.1]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown within the Solar PV Site to enhance biodiversity within the Site; and • As referred to within the oLEMP [APP/7.11.1], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. Potential visual effects for residential dwellings within the study area have not only been considered and assessed in detail within ES Chapter 6: Landscape and Visual [APP/6.2.1], but also considered in more detail as part of a RVAA, included as ES Appendix 6.7: Residential Visual Amenity Assessment [APP-145]. The RVAA focuses solely on private views and private visual amenity. The assessment concludes that the Residential Visual Amenity threshold would not be reached for any properties within the study area. Effects on all properties would not be sufficiently "oppressive" or "overbearing" that any property would be rendered an unattractive place in which to live. With regard to the permanent nature of change, the Scheme duration is long term but predominantly reversible following the decommissioning phase. The ES Chapter 6: Landscape and Visual [APP/6.2.1] assesses potential long term operational adverse landscape and visual effects based on the Scheme being long term reversible, as outlined in paragraph 6.5.23: <i>"Some forms of development, such as solar arrays, may also result in Long-term effects. Still, the intention is that the Scheme (excluding the National Grid Substation and Grid Connection Infrastructure which are the responsibility of National Grid) would be decommissioned at the end of its defined operational period, and effects would, therefore, no longer occur beyond that timeframe. These are assessed to be Long-term but reversible."</i>



7.17 Masterplanning

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Advance planting	RR-050	I am also concerned that work has already seemingly begun on a project that has not yet been approved with workmen planting huge swathes of bushes along the main road.	The Applicant has been liaising with the landowner to undertake advanced planting, and has committed to gap up and strengthen the existing hedgerows along the A1065 and around Field 27 in accordance with Design Principle 2.8. The advanced planting has been planned to be consistent with hedgerow enhancement works that the landowner has undertaken at the Site over the last several years, in accordance with their existing environmental stewardship schemes. The hedge planting / gapping up has been undertaken in such a way not to inhibit agricultural activities and, should the Scheme not proceed, would leave a positive environmental legacy.



7.18 Needs case

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Site selection	RR-028, RR-050	I fully recognise the importance of renewable energy and the need to address climate change. However, national policy is clear that renewable energy must be delivered in a way that avoids or properly justifies harm to valued landscapes, high-quality agricultural land, biodiversity and heritage assets. In this location, I believe the balance has not been struck correctly.	NPS EN-1 (2023) states, at paragraph 2.3.3, that the Government's policy objectives for the energy system are “to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050”. The 2025 NPS maintains the same wording also at paragraph 2.3.3, which further supports our position as the policy has remained consistent in this regard. Meeting this objective will require a rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure, per paragraph 2.3.5 of NPS EN-1 (2025). NPS EN-3 (2025) states, at paragraph 2.10.2, that “Solar energy is at the heart of our Clean Power 2030 Mission” and at paragraph 2.10.5 that “Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation”.
		National planning policy states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred. It is not clear that this sequential approach has been robustly demonstrated.	The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects such as the Scheme. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] 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/5.5.1] 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. The Site evaluation involved a number of factors as set out in Section 2.3 of NPS EN-3 (2023), including, but not limited to environmental considerations, such as agricultural land classification and land type to minimise the impact on the best and most versatile agricultural land and the avoidance of environmental constraints, such as those containing SSSIs, Nature Reserves, Ramsar Sites, Special Area of Conservation (SAC), and Special Protection Areas (SPA). None of the land within the Order limits is covered by any statutory landscape designations, i.e. National Parks or National Landscapes. The Applicant notes Breckland Forest SSSI and the River Nar SSSI, located approximately 2.5km south west and 0.5km north of the Order limits respectively; however, it was assessed that any potential impacts on the species for which these SSSI are designated could be mitigated through detailed design, including the use of setbacks from development and mitigation planting and screening.
		My concerns are about the placement of this proposed project so close to an area of outstanding natural beauty and the impact the building of this solar farm will have on the local area and its residents quality of life.	It is important to note that, as per paragraph 2.10.29 of NS EN-3 (2023) ‘land type should not be a predominating factor in determining the suitability of the site location’. The 2025 NPS maintains the same wording at paragraph 2.10.21, which further supports our position as the policy has remained consistent in this regard. NPS EN-3 (2023) and NPS EN-3 (2025) continues to acknowledge that solar development is not prohibited on BMV land and that it is recognised that, at scale, developments may use some agricultural land. Notwithstanding this, the Applicant has sought to minimise the use of BMV agricultural land and based on the published “provisional” ALC maps and the Likelihood of BMV maps, which represent all the available ALC information without field survey, the location for the Scheme was identified as likely to be some of the lowest quality land in the wider area. This is illustrated in ES Chapter 11: Soils and Agriculture [AS-018]. Further, paragraph 2.10.21 of NPS EN-3 (2023) recognises the preference for poorer quality land but allows significant weight to be given to the benefits of renewable energy, even where BMV land is affected. Environmental and heritage impacts have been assessed within each of the technical topics of the ES. The Applicant has applied the planning balance in the Planning Statement [APP/5.5.1] and considers that the identified substantial benefits of the Scheme outweigh the residual harms that would arise. Further, the CNP presumption means that these residual impacts are outweighed by the urgent need for the Scheme.





7.19 Site selection

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Site Setting	RR-063, RR-007, RR-023, RR-061, RR-060, RR-028, RR-041, RR-030	The area is described as ‘a landscape of heaths, conifer plantations and farmland on (...) chalk plateau (and) rolling clay farmland’. It is into this context that the developer hopes to convince us a solar ‘farm’ fits naturally, as an extension of age-old farming practices but this is an argument founded only with a view to profit and with no thought for the destruction the development would cause to the surrounding life, places and creatures.	NPS EN-1 (2023) states, at paragraph 2.3.3, that the Government’s policy objectives for the energy system are “ <i>to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050</i> ”. The 2025 NPS maintains the same wording also at paragraph 2.3.3, which further supports our position as the policy has remained consistent in this regard.
		It is hard for us to imagine somewhere less suitable for this massive industrial development - including the huge battery storage complex - than here. We are also concerned that, if accepted, a worrying precedent will be set. Once ruined, the land could be deemed suitable for all kinds of development that would render this precious, tucked-away corner of England another parcel of brownfield sprawl.	Meeting this objective will require a rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure, per paragraph 2.3.5 of NPS EN-1 (2025). NPS EN-3 (2025) states, at paragraph 2.10.2, that “ <i>Solar energy is at the heart of our Clean Power 2030 Mission</i> ” and at paragraph 2.10.5 that “ <i>Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation</i> ”.
		The idea of putting one of the largest solar arrays in the country here feels cruel and destructive beyond belief. Please don’t let this happen to this beautiful countryside; it is a very special place, remote and totally rural, that deserves all our efforts to preserve it.	The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects such as the Scheme, and that large-scale projects are needed to meet Government’s aim for a clean power system from 2030. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme.
		We also believe that solar is an integral part of the blend of sustainable energy sources that the U.K. will need to develop in the coming years, but we cannot be convinced that this proposal represents anything but a profit grab at the cost of a special and much-loved area of farmland, fields, woods and lanes.	The Planning Statement [APP/5.5.1] sets out the rigorous process that the Applicant undertook to select the Site including the consideration of environmental constraints. This is detailed within Appendix 1: Site Evaluation Report to the Planning Statement [APP/5.5.1] .
		We strongly feel that this kind of large industrial development is not suitable in such a small rural and historic area, and	The Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors, including consideration of designated international and national ecological and geological sites, nationally designated landscapes, ancient woodland, flooding and heritage and archaeological. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] and Planning Statement [APP/5.5.1] Appendix 1 Site Evaluation Report explains the methodology that has been applied when identifying and evaluating potential sites for the Scheme. The Applicant has provided an oSMP [APP/7.13.1] which sets out how soil will be handled, monitored, and restored during the lifetime of the Scheme. The oSMP [APP/7.13.1] confirms that no agricultural land will be destroyed as a result of the Scheme. Section 11.8 of ES Chapter 11: Soils and Agriculture [AS-018] sets out that by following the measures within the oSMP [APP/7.13.1] , soils will not be permanently affected. ES Chapter 6: Landscape and Visual [APP/6.2.1] outlines potential landscape and visual impacts as a result of the Scheme within the LVIA study area. Section 6.11 undertook a Cumulative Effects Assessment which included High Grove Solar Farm which concluded that there would be: - significant adverse visual effects during construction for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave; and - significant adverse landscape effects during construction and operation on the E6 North Pickenham Plateau LCA. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] identifies 15 designated heritage assets as potentially sensitive to the Scheme, 11 of which are considered to be high value assets. Designated heritage assets within Castle Acre include, but are not limited to Castle Acre Castle (Scheduled Monument (NHLE 1017909) with Grade I Listed elements (NHLE 1171480)); Castle Acre Priory (Scheduled Monument (NHLE 1015870) with Grade I Listed elements (NHLE 1342389)) and the Grade I listed St George’s Church (NHLE 1306357) There is no anticipated substantial harm to, or total loss of, any designated heritage assets’ significance as a result of the Scheme. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] outlines that ‘substantial harm’ is afforded to



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		we respectfully ask that consent for the Drovers Solar Farm be refused.	any adverse effect that is of a major magnitude, whilst moderate, minor or negligible adverse effects represent effects that are of 'less than substantial harm' in nature.
		In my view, that case has not been made. Conclusion Renewable energy is essential, but location matters. In this case, the proposal would: Contribute to cumulative industrialisation of the Nar Valley. Remove significant areas of high-quality agricultural land from production. Risk habitat fragmentation and wildlife displacement, particularly given reduced mitigation areas. Harm the setting of nationally important heritage assets	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, as all residual adverse effects on heritage receptors constitute 'less than substantial harm'. ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] and ES Appendix 8.3: Archaeological Desk-Based Assessment [APP-153] provide detailed information on the predicted changes to the setting of designated heritage assets within the study area and the impact that these changes would have on the significance of the assets. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be negligible at most. Therefore, there is no requirement for the Applicant to demonstrate exceptional or wholly exceptional circumstances to justify any unacceptable harm, as per the requirements of paragraphs 5.2.29 and 5.2.30 of NPS EN-1 (2023). The 2025 NPS maintains the same wording at paragraphs 4.2.29 and 4.2.30, which further supports our position as the policy has remained consistent in this regard. As set out in the Statement of Need [APP-042], an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission, per NPS EN-3 (2025) paragraphs 2.10.1 and 2.10.2. The Statement of Need [APP-042] confirms that the need for the Scheme is urgent and that substantial weight should be given to this, per NPS EN-1 (2023) paragraphs 3.2.9 and 3.2.10. The 2025 NPS maintains the same wording at paragraphs 3.2.9 and 3.2.10, which further supports our position as the policy has remained consistent in this regard. The Applicant notes the concerns about the motivations behind the Scheme. The Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The ES, Statement of Need [APP-042], and Planning Statement [APP/5.5.1] provide an assessment of the adverse and beneficial effects associated with the Scheme, an explanation of why the Scheme is needed and the benefits of solar energy generation, and the other benefits proposed by the Scheme. The Policy Compliance Document [APP/5.6.1] sets out local policies that the SoS may consider to be important and relevant in decision-making. It contains an appraisal of the Scheme's compliance against these relevant local policies. Solar panels do not emit any noise themselves, whilst other equipment, such as the solar inverter units, battery storage units, and substation, emit noise and have been assessed in accordance with the appropriate standards and criteria in ES Chapter 10: Noise and Vibration [APP-059] and ES Appendix 10.3: Construction and Noise Modelling [APP-166]. These noise emitting units have been placed as far as reasonable possible from surrounding residential properties to reduce noise levels and additional mitigation measures have been outlined where necessary to achieve non-significant effects at all receptors and public rights of way. These mitigation measures will be implemented in the detailed Construction Environmental Management Plan and secured as a DCO requirement. ES Chapter 10: Noise and Vibration [APP-059] concludes that, with embedded and additional mitigation measures in place, the Scheme, together with the cumulative schemes assessed, are not considered to result in significant adverse residual noise and vibration effects. The embedded and additional mitigation measures are documented within the: oCEMP [APP/7.6.1], oCTMP [APP/7.7.1], oOEMP [APP/7.8.1], oOTMP [APP/7.9.1] and oDS [APP/7.10.1]. Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], including with specific reference to international, national and locally designated sites of ecological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats, which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects.
		1. This development abuts onto several houses in Southacre- The (REDACTED) and (REDACTED). The WHO advises that solar farms should be placed 2 miles from residential dwellings. (Submission ID: 28466.) This is to mitigate noise, visual impact and glint/glare.	
		The Drovers Solar Farm proposal introduces a large-scale industrial development into the rural setting of Castle Acre, undermining the Plan's objectives to protect heritage, landscape character, and local biodiversity.	
		I consider that the proposed Drovers Solar Farm is incompatible with Castle Acre's heritage status, ecological importance, and community-led planning objectives and that it will cause irreparable harm to an irreplaceable historic and natural environment	



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
			Design principles 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/7.11.1]. New habitat creation will include grassland, scrub, and attenuation features. 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/7.6.1]. These include, but are not limited to, measures to control noise, light, and pollution. The WHO does not publish any rule, recommendation, or guideline requiring solar farms to be 2 miles (or any fixed distance) from homes. Environmental and heritage impacts have been assessed within each of the technical topics of the ES. The Applicant has applied the planning balance in the Planning Statement [APP/5.5.1] and considers that the identified substantial benefits of the Scheme outweigh the residual harms that would arise. Further, the CNP presumption means that these residual impacts are outweighed by the urgent need for the Scheme.
Site Size	RR-016, RR-063, RR-035, RR-064, RR-049, RR-001, RR-033, RR-012, RR-042, RR-004, RR-024, RR-048, RR-039, RR-047, RR-034, RR-046, RR-032, RR-027, RR-053	1 Too large an area of solar panels in important historical and rural landscape I would like to register my full support the report submitted by Castle Acre Parish Council and would add my personal concern that, whilst supporting renewable energy, I am appalled at the location and more importantly the size that has been selected for this project. I think this project is over large and will encroach onto the three Acres villages (Castle, West and South) and use valuable farming resources of which the UK is losing far too much already. The size of the site is horrific and once joined to the proposed Solar factory High Grove will expand all the way to along the A47 to Norwich . To be succinct: This seems like the most objectionable scale of industrialisation of our precious land. To allow this to go ahead would bring shame upon a generation and irreversible devastation to this pleasant land the kind of which is in short supply and needs to be nurtured not erased. From my perspective, the Drovers Solar Farm is a project that is worth engaging	NPS EN-1 (2023) states, at paragraph 2.3.3, that the Government's policy objectives for the energy system are “to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050”. The 2025 NPS maintains the same wording at paragraph 2.3.3, which further supports our position as the policy has remained consistent in this regard. Meeting this objective will require a rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure, per paragraph 2.3.5 of NPS EN-1 (2025). NPS EN-3 (2025) states, at paragraph 2.10.2, that “Solar energy is at the heart of our Clean Power 2030 Mission” and at paragraph 2.10.5 that “Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation”. The Statement of Need [APP-042] explains that there is a CNP for the delivery of large-scale solar generation projects such as the Scheme. The Statement of Need [APP-042] also explains that NPS EN-1 (2023) paragraphs 3.2.6 and 3.2.7 establish that there is an urgent need for the Scheme, and that substantial weight should be given to that need. The 2025 NPS maintains the same wording at paragraphs 3.2.8 and 3.2.9, which further supports our position as the policy has remained consistent in this regard. Further, that the proposed location is appropriate for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in timeframes compatible with the government's aims, coupled with sufficient solar irradiance, and a suitable area of secured land for the proposed solar and BESS. The scale of the Scheme has been carefully considered, balancing the need to maximise the grid capacity, in line with Government policy, whilst also making the most efficient use of the land and avoiding impacts. The Planning Statement [APP/5.5.1] and the Statement of Need [APP-042] 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. ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] 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/5.5.1]. It is supported by Appendix 1: Site Evaluation Report to the Planning Statement [APP/5.5.1] which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the Applicant's site evaluation process. To maintain flexibility in the design and layout at this stage in the process and ensure maximum effects are assessed in the EIA and considered by the SoS, the Scheme has adopted the Rochdale Envelope approach, This involves specifying



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
		with positively. The scale is significant, and it is right that impacts on views, heritage, and farming are examined carefully. Places like Castle Acre and the surrounding countryside matter, and any development nearby needs strong screening, thoughtful layout, and clear limits set through planning conditions.	parameter ranges, including details of the maximum and where relevant minimum size (footprint), technology, and locations of the different elements of the Scheme where flexibility needs to be retained. The Applicant is aware of other projects in the region. The Scheme and High Grove Solar Farm are separate projects with distinct red-line boundaries as defined within their respective applications. They are not a single, continuous site and should not be considered as such. Each of the ES Topic Chapters and ES Chapter 18: Summary of Effects [APP-067] consider the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. A full assessment of potential impacts to relevant SSSIs, including the River Nar SSSI, and irreplaceable habitats has been undertaken in Section 7.7 and 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. Embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse are secured through the oCEMP [APP/7.6.1], oOEMP [APP/7.8.1], and oDS [APP/7.10.1], by Requirements 13, 14, and 20 respectively in Schedule 2 to the draft DCO [APP/3.1.1]. The implications for food production locally and nationally are assessed in ES Chapter 11: Soils and Agriculture [AS-018]. The assessment concludes that there are no dangers to food security at a global or national level, as described in section 11.8 of ES Chapter 11: Soils and Agriculture [AS-018]. As set out in the Solar Roadmap, quoted in paragraph 11.8.103, “<i>the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly</i>”. The Applicant has provided an oSMP [APP/7.13.1] which sets out how soil will be handled, monitored, and restored during the lifetime of the Scheme. The oSMP [APP/7.13.1] confirms that no agricultural land will be destroyed as a result of the Scheme. The Applicant supports constructive engagement with the DCO Application, recognising that while its scale warrants careful consideration, particularly in relation to landscape, heritage assets such as Castle Acre, and agricultural land use, these impacts can be appropriately managed through sensitive design, effective screening, and robust planning requirements.



7.20 Socio-economics

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Socio – economics	RR-053, RR-020, RR-052, RR-002, RR-050	Loss of farming jobs for the locals and associated jobs , i.e. lorry drivers , agricultural machinery mechanics etc. Norfolk already has low payed jobs but these are better than no jobs.	The overall loss of employment arising from the conversion of agricultural land is expected to be negligible. The Applicant's assessments indicate that current on-site employment is in the range of 10–15 direct Full Time Equivalent (FTE) jobs, which would be displaced during the construction phase. Given the limited scale of existing on-site agricultural employment, indirect effects on associated jobs, such as lorry drivers and agricultural machinery mechanics, are also expected to be limited. ES Chapter 14: Socio-Economics [APP-063] states that the agricultural activities affected within the proposed PV module areas operate on a rotational basis and can be relocated to land outside the Site. As such, although some disruption and operational change may occur, these effects are not expected to lead to business closure or long-term loss of viability.
		House prices, will we all be compensated for living in this area . When we bought our property we thought we were going to live in the countryside not beside a solar factory. Who will buy our house ? Certainly not someone who wants to live in the countryside with pleasant walks and peace and quite with beautiful historical buildings dotted around	However, this temporary loss would be offset by employment generated through the construction of the Scheme, which is expected to support approximately 1,145 net additional jobs over the expected two-year construction period, with between 285 and 575 roles anticipated to be taken up by residents in the Local Construction Area (LCA) as stated in ES Chapter 14: Socio-Economics [APP-063] .
		This is a totally Agricultural area unspoilt by developement. As such it is becoming a maajor tourist destination. This will be negatively impacted.	During the operation and maintenance phase of the Scheme, arable activities would likely cease due to the presence of solar panels. There is potential for alternative agricultural uses, such as sheep grazing, beneath and around the panels. Overall, the level of on-site labour is not expected to change materially. While precise estimates are not available, a shift from arable production to sheep-based enterprises (if these were to occur) would generally involve similar labour requirements, including indirect jobs linked to on-site activity.
		The whole area is a very popular tourist destination thus bringing employment. This will cease causing immense hardship.	As a result, operational employment was scoped out of the assessment at the scoping stage, as agreed with PINS, on the basis that it is unlikely to give rise to significant effects. It has therefore not been assessed by the Applicant.
		Beyond environmental considerations, it would be helpful to see transparent economic impact analysis addressing how large-scale solar deployment may affect rural counties such as Norfolk, where tourism, agriculture, and landscape value are central to local livelihoods. Clear publication of these assessments, together with opportunities for open public debate, would strengthen trust and enable more informed community engagement.	Impacts on house prices were also scoped out at the scoping stage, as agreed with PINS. This is based on the limited and inconclusive evidence that utility-scale solar farms materially affect property values, alongside the Site's limited visibility from nearby housing and the small number of properties with potential views. As such, significant effects are not anticipated and this matter has not been assessed further by the Applicant.
		A large attraction to residents and visitors of castle acre is the beautiful views of unspoilt countryside - a solar farm smack bang in the middle of it has the opposite effect. There are businesses within the village that rely on tourist trade.	The Applicant acknowledges concerns regarding the potential effects of the Scheme on the character of the countryside, local tourism, and PRoWs. The assessment of effects on local tourism assets in ES Chapter 14: Socio-Economics [APP-063] finds that, while some localised adverse effects on visual amenity and recreational experience may occur, particularly at assets such as Castle Acre Priory and Castle, and along certain PRoWs, these effects are limited in extent and not significant in EIA terms, and would reduce over time through mitigation (including landscape screening and enhancements secured through the oLEMP [APP/7.11.1]). The Applicant notes that local businesses may rely on tourism-related spending. While the assessment in ES Chapter 14: Socio-Economics [APP-063] focuses on the effects on tourism assets, it found no significant effects on those assets in EIA terms. As such, it is reasonable to conclude that there would be no material change in overall visitor numbers or tourism activity, and therefore no adverse effect on the revenue of businesses that depend on tourist trade. While effects associated with construction worker expenditure were scoped out of the assessment, it is noted that there may be some limited, short-term increase in local spending during the construction phase.
			The assessment concludes that the Scheme would not materially affect overall visitor numbers or the functioning of tourism assets. Any adverse effects would be partially offset by improvements to the PRoW network, including enhanced connectivity and approximately 4.7 km of new permissive routes. As such, no significant residual socio-economic effects are anticipated on local tourism assets.
			The Applicant notes concerns raised in relation to compensation. The Applicant is committed to ensuring that communities benefit from the Scheme. As set out in the Planning Statement [APP/5.5.1] , the Applicant has committed to providing a Community Benefit Fund. Throughout the pre-application process, the Applicant has consulted on



Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
			community benefits and, based on feedback and ongoing discussions, will determine how best to distribute funding. The Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). The Applicant has undertaken a comprehensive and transparent assessment of the Scheme's likely socio-economic effects, in line with the agreed scope and relevant guidance, and has engaged with stakeholders and the local community throughout the pre-application process. The Applicant remains committed to ongoing dialogue and welcomes further engagement during the Examination phase.



7.21 Support for Scheme

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Support for Scheme	RR-001, RR-033, RR-012, RR-042, RR-004, RR-024, RR-048, RR-039, RR-047, RR-034, RR-046, RR-032, RR-027	I am writing to register as an Interested Party and to support the Drovers Solar Farm proposal. For these reasons, I support the Drovers Solar Farm in principle, provided it is delivered with strong conditions on landscape mitigation, biodiversity enhancement, construction traffic management, and respect for nearby heritage. I believe constructive engagement is the best way to ensure the project delivers benefits while addressing local concerns.	The Applicant notes that numerous representations have been submitted which express support for the Scheme, and the Applicant looks forward to continuing the constructive engagement (as referenced) during the examination.



7.22 Traffic

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Traffic	RR-053, RR-009, RR-050, RR-030	The Disruption to the local community on narrow roads for the proposed 2 years whilst good quality top soil is scrapped away and concrete and metal structures are put in place.	Construction traffic and HGVs will be restricted to access the Scheme from the east via the A1065 only, with internal routes provided within the Scheme to ensure that vehicles do not need to use the local road network or route via any of the local villages. This routing for HGVs is set out within the oCTMP [APP/7.7.1] and is secured by way of requirement on the DCO. Failure to comply with the requirements of the DCO is a criminal offence.
		Construction activity, increased traffic on narrow rural roads, and operational noise from equipment such as inverters and battery storage units are additional worries for those of us living nearby.	With respect to the impact on the A1065, the additional impact of construction traffic associated with the Scheme is considered within ES Chapter 9: Transport and Access [APP/6.2.1] , which concludes that the impact on the A1065 would be negligible. Nonetheless, mitigation measures are proposed within the oCTMP [APP/7.7.1] which include restrictions on HGV deliveries to avoid the AM (08:00-09:00) and PM (17:00-18:00) peak hours when the traffic flows on the network are the highest.
		The road between Swaffham and Fakenham is already very busy, there will be an impact made by the heavy goods vehicles that will be in constant rotation, on the day to day life of residents trying to live their lives peacefully and with ease.	ES Chapter 10: Noise and Vibration [APP-059] details the noise assessment from the operation and construction phases of the Scheme, including construction and operational traffic and HGV traffic movements and concludes non-significant effects from construction and operational traffic noise. The solar inverters and battery storage compound have been located with consideration to separation distances to the nearest surrounding receptors as part of the design evolution. Where necessary, additional mitigation measures (e.g., further separation distance of 500m, screening/enclosure of Conversion Units, and acoustic barriers) have been outlined to reduce noise levels to applicable limits in line with the appropriate criteria and concludes non-significant residual effects in EIA terms. The embedded and additional mitigation measures have been outlined in the oCEMP [APP/7.6.1] and oOEMP [APP/7.8.1] and will be detailed respectively in the detailed Construction Environmental Management Plan and detailed Operation Environmental Management Plan to be secured via a DCO requirement.
		by the installation of the associated infrastructure and from construction traffic is unacceptable in this rural and tranquil landscape	There will be no traffic associated with the removal of topsoil, as no topsoil will be removed from the Site. As set out in ES Chapter 11: Soils and Agriculture [AS-018] topsoil removal is limited to generally small areas such as for tracks and will be stored on site for subsequent use in restoration. For the larger areas such as the BESS and Customer and NG Substations, soils will be stored on Site for restoration, and no soils will be removed from the Site.



7.23 Water and hydrology

Relevant Representation(s) – Broad Issue(s) / Theme(s)	Reference numbers (of respondents)	Representation	Applicant response
Water and hydrology	RR-053, RR-008, RR-018, RR-035, RR-041, RR-030	Environment nearby ssi river Nar pollution from run off into one of the few chalk streams in the country,	The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP-061], which concludes that the Scheme would have no significant effects on water resources, including the River Nar, which is a chalk stream as identified in Table 12.13 Designations within WSA of ES Chapter 12: Water Resources [APP-061], throughout the construction, operation and maintenance, and decommissioning phases, through implementation of good practice measures. Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are secured in the oCEMP [APP/7.6.1] and ES Appendix 12.2: Flood Risk Assessment [AS-053]. Additionally, 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/6.2.2], taking into account the associated mitigation and design measures proposed in order to avoid significant harm to these designations. Section 7.8.16 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] concludes no significant effects from the Scheme on the River Nar SSSI. ES Appendix 12.2: Flood Risk Assessment [AS-053] states that 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. As such, the Scheme has been assessed as having a negligible effect on the water environment, including the River Nar SSSI. The Design Principles, Parameters Commitments [APP/5.8.1] have been updated at a future Deadline to state that fire suppressant containment structures will be designed to the 1% AEP event plus the appropriate volume based on guidance at the time of construction.
		we have a chalkstream which could be polluted if there is a chemical leak from Batteries or a fire.	
		The River Nar is of course an internationally important Chalk stream river whose catchment area must be protected (eg. building of the proposed massive solar substation would cause very damaging run off of deep lying disturbed soil material into this precious River system etc.).	
		3 Risk to water quality of river Nar chalk stream SSSI both from construction disturbance and potential for pollution from Battery storage should any fires occur.	
		3. Likewise the Nar Valley Way will be affected. The Nar Valley chalk stream is of primary ecological significance for its ecology and biodiversity. The run off from excavation and construction is likely to damage this SSSI , causing permanent loss of habitat and reducing the diversity of species, both in the river, and in the surrounding area.	
		The site lies within the catchment of the River Nar, a protected chalk stream designated as a Site of Special Scientific Interest (SSSI) supporting a range of important Biodiversity Action Plan habitats, including chalk stream areas, fens, wet meadows and woodlands.	



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