THE DROVES
SOLAR FARM

The Droves Solar Farm

Written Summary of Applicant's Oral Submissions and Responses to Action Points at Open Floor Hearing 1

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Contents

1 Introduction

1.1.1 This document summarises the oral submissions made by The Droves Solar Farm Limited (the Applicant) at Open Floor Hearing 1 (OFH1) held on Wednesday 6 May 2026 in relation to the application for development consent (the DCO Application) for the Droves Solar Farm (the Scheme).

1.1.2 The Examining Authority (the ExA) did not request further information from the Applicant on any matters discussed during OFH1, nor did the Applicant undertake to provide further information during the course of OFH1. Therefore, it is solely the Applicant's oral submissions made during OFH1 that are summarised in this document. This document does not detail the oral submissions of other parties, and only includes a summary of the topics raised by each speaker to provide context for the Applicant's oral submissions.

2 Written Summary of the Applicant's oral submissions at OFH1

2.1.1 Table 1-1 below provides a summary of the Applicant's oral submissions at OFH1.

Table 1-1 Applicant's Summary of Oral Submissions

#	Agenda Item	Summary of Submissions
1	**Welcome, introductions and arrangements for the hearing**	The following parties were present at the hearing: • Anthony Johnson, the ExA. • Alex Tresadern, Senior Associate at Pinsent Masons LLP, the solicitors for the Applicant. • Paul Darby, Swaffham Town Council. • Dr Mark Holmes, individual representative. • Tim Hubbard, Castle Acre Parish Council. Dr Ilga Chakrabarti, Castle Acre Parish Council.
2	**The purpose of the hearing**	The ExA explained that the purpose of the hearing was to enable Interested Parties (IPs) to raise any matters to the ExA for its consideration of the application. Mr Tresadern, on behalf of the Applicant, did not speak on this agenda item.
3	**Confirmation of those who have notified the ExA of a wish to be heard at the hearing**	A list of those who spoke at OFH1 is provided above. Mr Tresadern, on behalf of the Applicant, did not speak on this agenda item.
4	**Oral representations from IPs and any non-IPs**	Oral submissions were made by Paul Darby, Dr Mark Holmes, Tim Hubbard and Dr Ilga Chakrabarti. The Applicant has not repeated the submissions of these IPs in full in this document, as that is not its purpose, but has summarised the topics raised by each IP in their submissions as follows:

		Paul Darby • Cumulative impacts. • Tourism. • Traffic and transport. **Dr Mark Holmes** • Stone curlews. • Wider biodiversity impacts. **Tim Hubbard** • Cultural heritage. • Landscape and visual, including the River Nar. • Agricultural land use, including food production. • Public rights of way, including Peddars Way. • Dark skies. • Noise pollution. • Cumulative impacts. **Dr Ilga Chakrabarti** • Size, scale, duration and efficiency of the Scheme. • Landscape and visual. • Traffic and transport. • Community impact, including mental and physical health. Mr Tresadern, on behalf of the Applicant, did not speak on this agenda item.
5	**Responses by the Applicant**	***Post Hearing Note:*** *The Applicant wishes to note that it has reviewed, in full, the oral submissions made by IPs at OFH1. The Applicant notes that the matters raised are all responded to in full in writing across the suite of documents submitted by the Applicant at Deadline 1. Most notably, the Applicant refers to its* ***Responses to Relevant Representations [APP/8.4]*** *(given that the majority of points raised by IPs at OFH1 are contained in their Relevant Representations) and the* ***Written Summary of the Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [APP/8.8]*** *(given that several of the topics raised by IPs in OFH1 were discussed at length during that subsequent hearing). The Applicant therefore considers that (across those documents) it has provided a full and comprehensive*

		response to each matter/topic raised by the IPs in OFH1, but for the sake of completeness the Applicant has summarised its oral submissions made by its representative in OFH1 below. Mr Tresadern, on behalf of the Applicant, began by thanking the IPs for attending OFH1 and making their submissions. Mr Tresadern confirmed that the Applicant would respond, at Deadline 1, to all Relevant Representations made by IPs and referred to the upcoming Issue Specific Hearing 1 which would address some of the topics raised in OFH1 – see post hearing note above. **Need and Location of the Scheme, including size and scale** Mr Tresadern noted that the 60-year timeframe sought for the Scheme is well-precedented timeframe across recently-consented solar projects. Mr Tresadern noted that National Policy Statement (NPS) EN-1 (2023), which is part of the suite of policy statements under which the Scheme is being examined, 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 EN-1, which is a material and relevant consideration in the examination, maintains the same wording at paragraph 2.3.3. 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*". Mr Tresadern stated that the Applicant's **Statement of Need [APP-042]** explains that there is a critical national priority 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 solar) to meet government's aim for a clean power system from 2030. 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 Applicant's **Statement of Need [APP-042]**. Mr Tresadern also referred to Section 5 of the **Planning Statement [APP-043]** in this regard. Mr Tresadern noted that, in relation to the topic of alternatives, **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-043]** contains the **Site Evaluation Report**, which details the process followed in selecting the site location. 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 concerns. Chapter 4 of the ES and Appendix 1 of the Planning Statement also explain the methodology that has been applied when identifying and evaluating potential sites for the Scheme. Mr Tresadern also noted that 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 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. Mr Tresadern also noted 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. Mr Tresadern stated that section 2.9 of the Applicant's **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 therefore a large-scale solar scheme. 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-**

		043] 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. Further, Mr Tresadern noted that to maintain flexibility in the design and layout at this stage in the process and ensure maximum effects are assessed in the Environmental Impact Assessment (EIA) and considered by the Secretary of State, the Scheme has adopted the commonly-practiced Rochdale Envelope approach. This involves specifying 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. **Cumulative Impacts** Mr Tresadern stated that 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]**. 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 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. **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. Table 2-3 of this appendix contains the details of the selected schemes, which includes High Grove Solar. 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. Mr Tresadern noted that the 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]**. Those chapters and associated documents conclude that, with embedded and additional mitigation measures in place, there is a significant (in EIA terms) residual adverse effect for LVIA on E6 North Pickenham Plateau LCA (across all phases of the Scheme and High Grove Solar), but all residual adverse effects for heritage constitute 'less than substantial harm'. **Stone Curlew and Eurasian Curlew** Mr Tresadern stated that potential impacts on ground nesting birds, including Eurasian curlew, are fully assessed in **ES Chapter 7: Ecology and Biodiversity [APP-056]** which concludes that, following the implementation of the embedded mitigation (for example clearance of potential bird nesting habitat outside of bird nesting season) and the additional mitigation proposed, there will be no adverse likely significant effects, and indeed no offence under the legislation required for this species. 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. Mr Tresadern noted that to ensure that sensitive ecological receptors are protected through the construction of the Scheme, measures to be adhered to are set out within the **Outline Construction Environmental Management Plan** (oCEMP) **[APP-186]**. These include, but are not limited to, measures to control noise, light, and pollution. The design principles adopted by the Applicant also 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 **Outline Landscape and Ecological Management Plan [APP-191]**. New habitat creation will include grassland, scrub, and attenuation features. Mr Tresadern stated that impacts of the Scheme on priority habitats and species have been fully considered within section 7.8 of **ES Chapter 7: Ecology and Biodiversity [APP-056]** which concludes that, following the implementation of the embedded

		mitigation and additional mitigation proposed, there will be no adverse likely significant effects. 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 **[RR-038]** that "*we concur with the conclusion of the Shadow Habitats Regulations Assessment 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*". As such, Mr Tresadern noted that further survey work is not required. **Sites of Special Scientific Interest (SSSIs)** Mr Tresadern noted that 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-056]** 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-186]**, the **Outline Operational Environmental Management Plan [APP-186]**, and the **Outline Decommissioning Strategy [APP-190]** – Mr Tresadern noted that all of these management plans are secured by the corresponding requirements in Schedule 2 of the **draft DCO [APP-018]**. **Cultural Heritage** Mr Tresadern stated that the impact of the Scheme 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 in accordance with the methodology outlined. Mr Tresadern noted that **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. The chapter 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. However, there is no anticipated substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme. All residual adverse effects constitute 'less than substantial harm'. These residual effects would also be temporary and reversible. After decommissioning, several impacts on designated heritage assets resulting from the operational 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, and as assessed by the Applicant, the continued use of these elements of the Scheme would cause no additional impacts to those identified during the operational phase. Mr Tresadern stated that, in relation to the planning balance, the Scheme is not likely to result in any significant effects on cultural heritage. The Scheme's design development has sensitively considered the key heritage and archaeological receptors throughout, and appropriate mitigation measures are embedded into the Scheme's design. By implementing good design at the early stages of the process, the Scheme has avoided and minimised conflict with designated and non-designated heritage assets. Through the implementation of mitigation measures, all residual effects are assessed as being not significant and also equate to no more than 'less than substantial harm' on all designated and non-designated heritage assets impacted by the Scheme, as required by paragraph 5.9.32 of NPS EN-1 (2023) and paragraph 209 of the National Planning Policy Framework (2024), respectively. Mr Tresadern then noted that in accordance with NPS EN-1 (2023) paragraph 5.9.32 (and taking account of the principles set out by 4.2.16 and 4.2.17 of NPS EN-1 (2023)), the substantial public benefits and need for the Scheme as set out in sections 3 and 6 of the **Planning Statement [APP-043]**, including the delivery of Critical National Priority infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets, particularly so as the policy tests relating to substantial harm are not triggered. Overall, Mr Tresadern stated that it is comfortably the Applicant's position that the Scheme complies with the relevant policies in relation to the historic environment and no residual significant effects are anticipated. As a result, it is considered that the historic environment should be given neutral weight in the planning balance. **Agricultural Land Use and Food Production**

		Mr Tresadern stated that, 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 5ha of BMV land, plus less than 5ha for mitigation planting, as set in Table 11-7 of ES Chapter 11. Overall, the ES Chapter 11 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. **Peddars Way** Mr Tresadern stated that 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 Site. Potential visual effects of the Scheme on users of the Peddars Way and Norfolk Coast Path have been assessed within **ES Chapter 6: Landscape and Visual [AS-016]** with reference to viewpoint locations, supporting photography and visualisations situated along the Peddars Way and Norfolk Coast Path and also within 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 Landscape and Visual Impact Assessment study area. **Tourism** Mr Tresadern stated that the Scheme is not anticipated to result in any residual adverse effects on socio-economic receptors across all phases of the Scheme. Indeed, Mr Tresadern noted that the Scheme has been assessed to result in an anticipated significant beneficial effect on the provision of education, skills, training and supply chain as a result of these phases. **Traffic and Transport** Mr Tresadern stated that mitigation measures and commitments identified to address concerns in relation to traffic and transport matters are secured in the **Outline Construction Traffic Management Plan [APP-187]** and the **Outline Operational**

		Traffic Management Plan [APP-189]. These management plans are secured by the corresponding requirements in Schedule 2 of the **draft DCO [APP-018]**. **<u>Engagement</u>** Mr Tresadern reiterated the Applicant's gratitude for all IPs attending OFH1 and making their submissions. Mr Tresadern stated that the Applicant continues to welcome ongoing engagement with all IPs throughout the examination.
6	**Close of the hearing**	The ExA closed the hearing. Mr Tresadern, on behalf of the Applicant, did not speak on this agenda item.

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