THE DROVES
SOLAR FARM

The Droves Solar Farm

Written Summary of the Applicant's Oral Submissions and Responses to Action Points at Issue Specific 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 Issue Specific Hearing 1 (ISH1) held on Thursday 7 May 2026 in relation to the application for development consent (the DCO Application) for the Droves Solar Farm (the Scheme).

1.1.2 Where the Examining Authority (the ExA) requested further information from the Applicant on specified matters, or the Applicant undertook to provide further information during the course of ISH1, that further information is either set out in this document or provided as part of the Applicant's Deadline 1 submissions.

1.1.3 This note does not purport to summarise the oral submissions of other parties, and summaries of submissions made by other parties are only included where necessary to give context to the Applicant's submissions.

2 Written Summary of the Applicant's oral submissions at ISH1

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 and arrangements for the hearing**	The Applicant did not make any submissions in relation to the ExA's opening remarks.
2	**Purpose of ISH1 and introductions**	The following parties spoke at ISH1: • Anthony Johnson, the ExA. • Alex Tresadern, Senior Associate at Pinsent Masons LLP, the solicitors for the Applicant. • Tabitha Knowles, Director, DWD (advising the Applicant). • Si Gillett, Director, Humbeat (advising the Applicant). • Dave Elvin, Chief Development Office, the Applicant. • Rob Pile, Director, LDA (advising the Applicant). • James Plumb, Senior Technical Analyst, Pager Power (advising the Applicant). • Olli Wheeler, Principal Consultant, LDA (advising the Applicant). • Paul Gajos, Director, GHC Heritage (advising the Applicant). • Liam Nevins, Director, Raincloud (advising the Applicant). • Julie Barrow, King's Lynn and West Norfolk Borough Council. • Lynette Fawkes, King's Lynn and West Norfolk Borough Council.

		• Rebecca Collins, Breckland Council. • Mark Kiddle-Morris, Breckland Council. • Andrew Sierakowski, Norfolk County Council. • Mike Bennett, Sporle with Palgrave Parish Council. • Tim Hubbard, Castle Acre Parish Council. • Anne Mason, Castle Acre Parish Council. • Dr Mark Holmes, individual representative. • James Wild MP, for North West Norfolk. • Charlotte Jones, Addleshaw Goddard LLP (advising National Grid Electricity Transmission Plc (NGET)). • Jon Wilson, Defence Infrastructure Organisation. • Morgan Harringman, Environment Agency.
3.1	**Site selection and alternatives**	**The ExA** queried the Applicant's approach for considering alternative site locations, sizes, and scales for the Scheme. **Tabitha Knowles, for the Applicant,** began by explaining the policy framework that has been applied to site selection and the Applicant's consideration of alternatives, and where this is set out within the DCO Application documents, and then moved on to the approach taken to site selection, reasonable alternatives, the 'why here' point, and how this has informed the Order limits. The Applicant's approach to site selection and its consideration of reasonable alternatives has been guided by relevant planning policy and guidance: Part 4.3 of National Policy Statement (NPS) EN-1, Part 2.3 of NPS EN-3 and Part 2.2 of NPS EN-5. **Ms. Knowles** noted three key points: • Whilst there is no general legal or planning policy requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective, applicants are obliged to include information about reasonable alternatives that they have studied in their Environmental Statement (ES), with reference to paragraphs 4.3.9 and 4.3.15 of NPS EN-1. • When considering alternatives that should be carried out in a proportionate manner, only alternatives that can meet the objectives of the Scheme need to be considered. These need to be reasonable alternatives and it is recognised that most renewable energy resources can only be developed where the resource exists and where it is economically feasible. Alternative proposals that are not commercially viable or physically suitable can be excluded. The policy reference for this matter is paragraphs 4.2.27 and 4.3.22 of NPS EN-1, and paragraphs 2.3.5 and 2.3.9 of NPS EN-3. • There is no prescribed methodology in national planning policy or guidance for site selection in relation to

		solar development. However, paragraphs 2.10.21 and 2.10.26 of NPS EN-3 recognise that a viable grid connection is an essential material consideration for proceeding with development. Paragraphs 2.10.19 to 2.10.48 of NPS EN-3 are also relevant, being factors likely to influence the siting of solar development. National Grid's guidelines on siting and design, commonly referred to as the Horlock and the Holford rules, have also been applied to the Applicant's assessment. This guidance explains the approach taken to the transmission system of electricity for England to assist those parties responsible for designing and locating substations. This is aligned with paragraphs 2.9.16 to 2.9.19 of NPS EN-5, which also set out the Holford rules, which provide guidelines for the routing of overhead high voltage electricity lines to minimize visual and environmental impact, and the Horlock rules, which provide guidance for the siting and design of substations and other related infrastructure to reduce the environmental impact of such developments. National Grid also use this guidance to inform site selection and assessment of alternatives for its own projects. The detail on the Applicant's site selection assessment and its consideration of alternatives is set out within **Appendix 1 (Site Evaluation Report)** of the **Planning Statement [APP-043]**, with respect to an appraisal of alternative sites, and this demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant. The other key document is **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053]**, with respect to the Scheme layouts and choice of technology. This chapter explains the legal and policy background relevant to consideration of alternatives and the design development of the Order limits. It also covers the evolution of the design of the Scheme from the identification of the initial Order limits through to the Order limits submitted in the DCO Application. **Ms. Knowles** explained that with respect to how the approach taken to site selection and consideration of reasonable alternatives has been applied to explain the 'why here' point, the starting point was the grid connection offer from National Grid. The Applicant is required to obtain land and consent for a new National Grid Substation within its DCO. This is detailed within the **Grid Connection Statement [APP-181]**, which explains that the National Grid Substation is to be sited and designed to connect the Scheme to the 400 kV transmission network between the existing substations at Necton and Walpole. Recent solar NSIP decisions, as outlined in section 4.4 of **Appendix 1 (Site Evaluation Report)** of the **Planning Statement [APP-043]**, confirms that the Secretary of State supports this approach to selecting grid connection points as an appropriate starting point. As such, the site selection exercise and its consideration of reasonable alternatives has formed two parts. Part one was the National Grid Substation siting assessment, and part two was the site evaluation of the solar development site. As part of this, a sequential and logical approach was then carried out with reference to the relevant policy assessment principles. **Appendix 1 (Site Evaluation Report)** of the **Planning Statement [APP-043]** confirms that a key principle and site evaluation process was to avoid areas of particular environmental and landscape sensitivity where possible to minimize potential impacts. **ES Chapter 4: Reasonable Alternatives and Design**

		Evolution [APP-053] also adds that amongst other considerations, the Applicant sought to develop a scheme that would avoid impacts on sensitive landscapes and environmental features as far as possible. Another key part of the site selection process was that there was a willing landowner. At the same time as National Grid's offer for a 500 MW connection, a land agent indicated to the Applicant that the landowner was willing to put forward the proposed site for a solar farm development. Single, continuous sites with as few landowners as possible has been prioritised as part of the Applicant's search. This single willing landowner is located directly adjacent along the existing overhead lines and will provide sufficient land to the site for the Scheme in its entirety, and also providing opportunities for flexibility and precisely where solar and associated mitigation could be located. The result of this is that the site location has been chosen as it is suitable for large scale solar development. The availability of significant capacity in the existing overhead line between Walpole and Necton was the primary driver in identifying this part of Norfolk. When determining the appropriateness of a site, the Applicant has considered a range of factors, including a large enough site area, topography, access, and the lack of designations. The available land fits the factors explored by the Applicant in its assessment and is aligned with the relevant planning policy, being without many constraints and with the benefit of a potential viable connection point to be included within the site. **The ExA** queried what alternative locations for the National Grid Substation and BESS were considered. **Ms. Knowles** explained that the National Grid Substation location formed the starting point of the site selection process. The Applicant undertook a desktop assessment to identify potential locations for the substation along that approximately 45km stretch of the existing 400 kV transmission line. The key tests were that where the site interacted with the main road, being an A or B road, and the key reason for that is accessibility, and as a result of that, four possible zones were identified along that 45km stretch. A zone was then identified around 1km either side of the existing 400 kV overhead line, and an analysis was carried out of those four zones generally with respect to environmental and technical factors. Zone 4 was identified as the most suitable location for the proposed National Grid Substation. It avoids protected areas such as national landscapes and Sites of Special Scientific Interest (SSSIs), with only two nearby, being the River Nar and Castle Acre Common, and impact on these can be protected through careful design. Zone 4 contains no significant heritage sites, wildlife designations, or ancient woodlands, and only small areas of lower priority habitats, and they can be largely avoided. Existing woodlands that could help screen the development are also possible. In addition, the Site fits with planning policies, avoids residential properties in its entirety, it being Grade 3 agricultural land. There is some flood risk, but this can be managed through design. The Site's landscape and vegetation will help minimise the visual and noise impacts as well. **The ExA** queried whether the size and scale that the Applicant considered represents an optimum scale for solar development, or whether there is a certain scale or capacity of solar developments that represent the best efficiency.

		Alex Tresadern, for the Applicant, explained that the scale of the Scheme had 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-042]** and the **Statement of Need [APP-043]** 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. **Si Gillett, for the Applicant,** explained that the context within which this Scheme is coming forward is one of rapid climate change. The world is warming and will continue warm until carbon emissions are sufficiently reduced. International relations have become tensioned, and the international supplies of energy have been weaponised. What that means is that consumer pockets have paid and continue to pay the price, yet we continue to need secure low-carbon energy for our communications, transport, heat, light, entertainment, comfort, and other matters. **Mr. Gillett** explained that, as stated in paragraph 2.3.3 of NPS EN-1, the government's objectives are to ensure that the supply of energy always remains secure, reliable, affordable, and consistent with meeting the UK's legally binding target to cut greenhouse emissions to net zero by 2050. **Mr. Gillett** explained that the government published the Clean Power 2030 Action Plan in December 2024, and section 2.9 of the **Statement of Need [APP-042]** provides more information on that and its relevance to the Scheme. **Mr. Gillett** noted that the capacity of schemes needed to come forward to meet government's objectives is unprecedented, and the capacity of schemes that are coming forward and that indeed have already come forward is not yet at a scale that meets that need. Therefore, there is a driver to continue to develop all forms of low-carbon generation to ensure that government's objectives can be met, but also that the risks associated with meeting government's objectives can be minimised, which essentially means a large number of schemes of a wide variety of low-carbon technologies are required to come forward. Government has set capacity ranges of 45 to 47 GW of operational large-scale solar by 2030, and the 2035 capacity range increases that up to 69 GW, so a range from 45 to 69 GW. Government has clarified that that is not a fixed ceiling on technology deployment, nor on project approvals, because even achieving those capacity ranges in the time stated does not meet the need as anticipated for a low-carbon energy system by 2050. In response to a question from **the ExA** around scale and efficiency of solar farms, **Mr. Gillett** stated that this is addressed in section 6 of the **Statement of Need [APP-043]**. There are benefits to connecting solar farms to the large-scale national electricity transmission system. Those benefits are around the bulk transfer of power, the transport of power from where it is generated to where it is needed, and when it is needed in an unconstrained way. **Mr. Gillett** reiterated that the Scheme has been designed to optimise the use of the grid connection facility that is available to it, and therefore the design principles of the Scheme are particular to the size of that connection and also the specific locations of this point.

		In response to points made by **James Wild MP, for North West Norfolk**, about the use of agricultural land, **Mr. Tresadern** noted that paragraph 2.10.29 of NPS EN-3 states that "*land type should not be a predominating factor in determining the suitability of the site location*". NPS EN-3 also acknowledges that solar development is not prohibited on BMV land and that it is recognised that, at scale, developments may use some agricultural land. **Ms. Knowles** reaffirmed that a sequential and logical approach had been taken with reference to the relevant policy and guidance within NPSs with respect to the consideration of alternatives, as well as National Grid guidelines on siting and design. The starting point was the grid connection availability, which is an approach taken on other NSIPs. The alternative sites are set out within **Appendix 1 (Site Evaluation Report)** of the **Planning Statement [APP-043]** and the **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053]**. As stated above, the alternatives considered were the four zones as part of that initial site selection exercise, and then at the next stage there was consideration of the solar development and what parcels of land would be most appropriate for development within a 5km radius. **Mr. Gillett** reiterated that there is an unsatisfied and urgent need for an unprecedented capacity of new generation schemes to come forwards. And as discussed in section 3.6 of the **Statement of Need [APP-043]**, the number of locations at which large-scale generators and large-scale solar generators in particular are able to come forward is limited, and that is important in the context of the consideration of alternatives, both of solar and of other low-carbon technologies, because, as is set out in paragraph 4.3.24 of NPS EN-1, it is considered that all suitable sites for low-carbon technologies may also be needed, rather than needed instead of specific developments which come forwards. There is a significant capacity of wind and solar schemes which are being proposed at present, which is important as well and can be contextualised because paragraph 3.3.20 of NPS EN-1 describes the government's view that the net zero-consistent energy system of the 2050s is likely to be composed predominantly of wind and solar. This further supports the view that potential alternative technologies (i.e. different technologies in different locations) cannot be considered as alternatives, because it is the government's view that they will also likely be needed to come forwards. In response to a point from **Dr. Mark Holmes,** regarding food security, **Mr. Tresadern** stated that the assessment in **ES Chapter 11: Soils and Agriculture [APP-060]** concludes that the implications of the change from current farming practices will have minor or negligible effects on the local and national land-based economy and food production. ***Post hearing note:*** *The Applicant notes that Action Point 1 of* ***[EV5-009]*** *requests the Applicant to respond in writing regarding the matter of food production. The Applicant notes that 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 that chapter. As set out in the Solar Roadmap, quoted in paragraph 11.8.103, "the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly". 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).* In response to a point from **Dr. Mark Holmes,** regarding the matter of wind energy as an alternative to solar, **Mr. Gillett** responded that the Scheme is a large-scale solar scheme. The Applicant is a solar developer and therefore is proposing a solar scheme. The moratorium for onshore wind in the UK has only been lifted as recently as 2025; therefore, at the time of this Scheme going through its development process and maturing through that process, onshore wind was not a viable alternative at this location. The government's position is that wind, being either offshore and onshore wind, and solar is needed to meet the energy needs of the future. Clearly, in relation to an onshore wind farm, the effects of that farm on the local environment would need to be assessed to determine if that was suitable from a planning perspective. Because this Scheme is a solar scheme, those effects have not been assessed as part of this application. ***Post hearing note:** The Applicant notes that Action Point 3 of **[EV5-009]** requests the Applicant to summarise its position in writing regarding wind turbines. The Applicant notes that Section 2.9 of the **Statement of Need [APP-042]** describes that the Government's Clean Power Mission is to achieve a clean power system by 2030 and keep clean beyond 2030 as electricity demand is anticipated to double by 2050 through the electrification of energy currently supplied from fossil fuel. To deliver the Clean Power Mission, the government has established challenging capacity ranges for all low-carbon technologies. These are listed in Table 2.1 of the **Statement of Need [APP-042]**. For large-scale solar, the current ranges are 45-47GW by 2030 and 45-69GW by 2035. The NPSs explain that irradiance levels, topography and access to the grid are key inputs into site selection (see NPS EN-3 (2025) paragraphs 2.10.11 – 2.10.18 and NPS EN-3 (2023) paragraphs 2.10.19 – 2.10.26). Evidence on the suitability for large-scale solar development in north Norfolk and the site specifically is provided at Figure 6-2 (irradiance) and Chapter 7 (access to grid) of the **Statement of Need [APP-042]**. Further detail on site selection is provided in **Appendix 1 (Site Evaluation Report)** of the **Planning Statement [APP-043]** at paragraph 3.3.6 (topography).* *The NPSs (see paragraphs 4.3.23 and 4.3.24 of NPS EN-1 (2023) also explain that "the Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the Scheme, and that the Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.* *The Infrastructure Planning (Onshore Wind Generating Stations) Order 2016 removed all onshore wind*

		generating stations in England and Wales from the definition of nationally significant energy generating stations. Onshore wind technology was only re-introduced to the definition of nationally significant energy generating stations under the Planning Act 2008, effective from when the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 took effect on 31 December 2025, i.e. after the submission of the DCO Application for this Scheme. *The Applicant is a solar developer and the Site is suitable for large-scale solar development. Further, because onshore wind was not an option at the time of development, environmental screening, surveys and impact assessment for an onshore wind scheme at the site have not been carried out, but would be required to have been carried out in order to bring forward any proposals for consent. This necessary activity would likely take place over several years, meaning that (assuming an onshore wind scheme was assessed as suitable and secured consent) this development would be unlikely to come forward in the same timescales as the Scheme.* *Finally, Section 6.7 of the **Statement of Need [APP-042]** explains that, when compared to onshore wind, the energy production from land under solar is of a similar order of magnitude (MWh per year per acre) while the environmental effects of solar schemes may be felt over a significantly smaller geography. It is therefore not the case that an onshore wind development at the Site would be likely to deliver greater benefits or have fewer adverse impacts than the proposed solar Scheme.* In response to a point from **Tim Hubbard, for Castle Acre Parish Council,** regarding the efficiency of a solar farm, **Mr. Gillett** referred to Figures 8.1 and 8.2 of the **Statement of Need [APP-043]** and the government's policy view that the energy system of the future will predominantly consist of wind and solar. The Scheme includes BESS to assist with meeting the future needs of the energy market. **Mr. Gillett** referred to the difference between efficiency and productivity: solar is approximately 23% to 25% efficient, which means that of the energy contained in the free, plentiful sunlight that hits the solar panels, about 23% to 25% of that energy is converted into electrical energy, which can then be used, with no marginal byproducts and no carbon dioxide generated. That is the number on efficiency, and that number is increasing all the time. In relation to the productivity of solar, which is sometimes also called the load factor of solar, a solar farm in the UK will, depending on its design, produce the equivalent of 10.5% to 13% of its equivalent rated capacity. This means a one MW solar farm would produce the equivalent of 105 kW to 130 kW base load equivalent per year. More of that generation would be in the summer and less in the winter, and clearly more during daytimes rather than nighttimes. Figure 8.2 of the **Statement of Need [APP-042]** provides an analysis of the expected level of generation from a combined wind and solar portfolio in the UK in the event that the government's 2030 capacity ranges have been built out. This shows that during the summer, when solar is stronger, UK wind is weaker. And in the winter, when wind is stronger, solar is weaker. Those portfolios, on that month average level basis, complement each other to support generation dependability

		and security of supply across each month of the year. BESS, which is proposed as associated development to this Scheme, would further support harnessing energy from the Scheme at points when demand is lower and releasing it when demand is higher, supporting the utility of the Scheme within the energy market. In response to a point from **Andrew Sierakowski, for Norfolk County Council,** regarding the strategic energy mix, **Mr. Gillett** noted that Table 2.1 of **Statement of Need [APP-042]** sets out the government's clean power capacity ranges for 2030 and for 2035. It is these ranges which have been used recently by NESO to reprioritise the connections queue. The important point, which is explained more fully in section 2.9 of **Statement of Need [APP-042]**, is that the clean power capacity ranges are not prescriptive. They are guidelines, and the government has retained optionality within those guidelines that it has given to help the industry and the sector along the road towards net zero. The Government therefore effectively reserves the right to change those capacity ranges in the future. In order to get to its target, which is a clean power system (this means that over 95% of the electricity generated in the UK is from clean sources, and that more electricity is generated from clean sources in the UK than is consumed from all electricity sources in the UK), the government needs projects to get connected and get operational. Therefore, it is possible that if the mix of projects which become operational is different to the trajectory that the government has indicated through those clean power capacity ranges, then the Government may need to update those ranges in order to protect its clean power targets. That is the principle behind the point that the government make in Planning for New Energy Infrastructure, which was the consultation response to the new NPSs. The Government state that its capacity ranges are not designed to limit or constrain the consent of or the number of projects coming forwards, because a robust pipeline of projects is needed through to 2050. This clearly sets out the position that the scale of change needed in the energy market to maintain a hope of achieving net zero by 2050 is so significant that an unprecedented capacity of all schemes, and of all technologies, is required to come forward, and that need is not yet met. In response to a point from **Mr. Wild**, regarding the energy mix and rooftop solar, **Mr. Gillett** noted that section 2.9 of the **Statement of Need [APP-043]** borrows from the Clean Power 2030 Action Plan, which explicitly states that the capacity ranges set out in that table do not include rooftop solar, and that rooftop solar is expected to come forward as well. Aside from the hope that rooftop solar will grow, the capacity ranges are for 45 to 47 GW of large scale, not including rooftop solar, by 2030, and currently 45 to 69 GW of large scale, not including rooftop solar, by 2035. In response to a point made by **Anthony Morgan,** regarding efficiency and gas-powered facilities, **Mr. Gillett** responded that gas systems produce carbon emissions; therefore, for gas to be a part of the future energy system, it either needs to be fuelled with low-carbon gas, or those emissions would need to be captured and stored underground. Sections 5.7 and 5.8 of the **Statement of Need [APP-043]** address what the government is doing

		in those areas and the likely timeliness of the delivery of sufficient scale of carbon capture use and storage, or hydrogen facilities, to be able to deliver a low-carbon scheme. **Mr. Gillett** referred again to the urgency of the need to decarbonise and the government's conservative approach to delivering its energy objectives, i.e. the Government's policy is not to only wait for something which has not yet been delivered at scale, to be delivered at scale, to meet its objectives. In response to a point made by **Mr. Sierakowski** regarding fixed and tracker panels, **Mr. Tresadern** noted that, due to the fast evolving pace of solar PV technology, the Scheme has allowed for flexibility in its design, allowing the opportunity to utilise specific technology closer to construction within the parameters outlined in **ES Chapter 5: The Scheme [APP/6.2.2]** and the **Design Approach Document [AS-009 to AS-011]**. For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage. ***Post hearing note:*** *The Applicant notes that Action Point 2 of* ***[EV5-009]*** *requests the Applicant to respond to points raised by Norfolk County Council, including fixed and tracker panels. The Applicant considers that the above response, regarding flexibility, is a proportionate response, but refers also to the* ***Applicant's Response to Relevant Representations [APP/8.4]*** *where the Applicant has responded to all matters raised by Norfolk County Council.* In response to a point made by **Mr. Sierakowski** regarding overhead lines against underground cabling, **Mr. Tresadern** noted that connecting to the overhead line point of connection via transmission cables overhead was considered by the Applicant to be the most effective and least disruptive form of connecting the Scheme to the National Grid. Undergrounding these cables could lead to a loss of current carrying capacity rating of these cables, which could affect the amount of electricity transmitted. Connecting to the existing transmission line via overhead line cables is seen as a common practical method, particularly considering the close proximity of the overhead line to the proposed National Grid Substation. Typically, underground cabling is reserved for longer distances where it is not feasible to run overhead cables. Paragraph 2.9.20 of NPS EN-5 states that it is the government's position that overhead lines should be the strong starting presumption for electricity network developments in general.
3.2	**Grid connection**	In response to points made by **Charlotte Jones, for NGET,** regarding the location of the proposed National Grid Substation, **Alex Tresadern, for the Applicant,** noted that the Applicant had a productive and useful meeting with NGET's representatives and lawyers on 5 May 2026. In that meeting, it was agreed that NGET have not yet undertaken the required site selection analysis for the proposed National Grid Substation location due to their priorities understandably being elsewhere at the present time. The Applicant has noted that and set out its position to NGET in that meeting, which includes pressing on with seeking consent for the National Grid Substation as

		part of this DCO Application. **Mr. Tresadern** referenced the Applicant's **Response to section 89(3) letter dated 17 March 2026 [AS-063]** in this regard. The Applicant has been working on grid connections with NGET since 2018, and whilst in dialogue with NGET in 2022 regarding the potential to connect into the Kings Lynn substation, IGP, the parent company for the Applicant, were advised by NGET to apply for and subsequently connect directly into the overhead line running between the Walpole and Necton substations. The reasoning for this was understood by the Applicant to be a lack of available space for the infrastructure required to connect into either of those existing substations. At the pre-application stage of the Scheme, however, the Applicant was advised by NGET that it would be responsible for identifying a site for a new substation for the Scheme, i.e. the National Grid Substation included in the DCO Application, alongside obtaining the land rights and planning consent for this. Under the terms of the Applicant's grid connection offer received from NESO, the connection of the Scheme to the overhead line via the new National Grid Substation has been identified. Appendix I of the Construction Agreement contained within that grid connection offer, as summarised in the **Grid Connection Statement [APP-181]**, states that the Applicant has responsibility to obtain land and consent for the National Grid Substation. Therefore, the Applicant has a contractual duty to obtain that land and consent at this time for the National Grid Substation under the terms of that grid connection offer. There is no requirement in the grid connection offer for the Applicant to seek approval for the location of the National Grid Substation from NGET, but the documents contained within the grid connection offer state that the applicant must apply for planning consent by 30 March 2027 and inform NGET of the location of the National Grid Substation by 28 February 2028, both of which the Applicant has done. **Mr. Tresadern** noted that NGET stated that they are not currently developing proposals to build a new substation within the Scheme's Order limits. The Applicant agrees with this statement and notes, as stated, that the responsibility for developing the proposals for the National Grid Substation is currently placed upon the Applicant. NGET have also stated that the location of the National Grid Substation is still to be confirmed, with the siting studies to be reviewed post-connection reform. In the opinion of the Applicant, that would mean that NGET would not be reviewing the proposed location for the National Grid Substation until mid or late 2027, and possibly even later than that, given that most of the key connection reform published timelines have not yet been adhered to so far in the industry. That timeframe would conflict with the Applicant's contractual and timestamped obligations. Therefore, until NGET or NESO confirm otherwise, the contractual obligations comprising the Applicant's grid connection offer for the Scheme remain binding, meaning the Applicant is contractually obligated to meet the milestones within and, therefore, 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, and the Applicant is not aware of any reasons as to why this substation should be refused as associated development to the Scheme.

		Mr. Tresadern noted that a point was also made about the fact that the Scheme has been reprioritised with a Gate 1 connection offer. Having a Gate 1 connection offer means that 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 Connection 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 reprioritised, especially as the government continues to refine its criteria for strategic alignment. It is 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, of course, keep local representatives and communities updated as matters progress. The fact that the Scheme includes, as associated development, the proposed National Grid Substation for the Scheme reduces uncertainty around the deliverability of that connection if the Scheme is to be consented. Responding to a question from **the ExA** regarding the inclusion of the National Grid Substation in the Order limits, **Tabitha Knowles, for the Applicant,** noted that NGET's guidelines on siting and design were applied to the site selection exercise, including the Horlock and Holford Rules. NGET also use this guidance to inform site selection and assessment of alternatives for its own projects coming forward. **Ms. Knowles** provided some examples around the application of the Horlock rules, and how Field 27 (which is where the National Grid Substation is proposed to be located) was identified. There were a number of factors that informed selection, which are aligned with those Horlock rules: the potential to use the land within the control of the Applicant and reduce any reliance on compulsory purchase powers; the potential to accommodate the footprint of the National Grid Substation, avoiding the removal of existing vegetation and allowing for potential for screening of views by mounding or planting; proximity to the existing overhead line, i.e. the potential to reduce the need for additional electrical infrastructure to connect into and/or divert the existing overhead lines; proximity to the A1065, i.e. the potential to avoid rural roads, and minimise the length of new access roads required to construct and operate the substation; environmental constraints, i.e. the potential to avoid and minimise direct impacts to environmental and cultural designations and flood risk zones; topography, i.e. the potential to construct a level development platform whilst reducing the need for cut and fill; residential receptors, i.e. the potential to minimise visual and noise effects on residential receptors; and agricultural land classification, i.e. the potential to minimise loss of best and most versatile agricultural land. **Mr. Tresadern** further noted that the Applicant's position is that the approach taken is recognised and provided for within section 4.11 of NPS EN-1, which at paragraph 4.11.7 encourages applications for new generating stations and related infrastructure to be contained in a single application. The Applicant has a grid connection offer for the Scheme, which requires it to secure consent and land for the point of connection, and the Applicant's approach and methodology is therefore sound. Consent is being sought for the National Grid Substation in a

		location that the Applicant considers suitable based on NGET's criteria, and consent for the potential National Grid Substation in this location should therefore be fully examined, and NGET will have the option to carry out the works should they determine that the proposed site for the substation is suitable. In the event that NGET indicates a preference for an alternative location, at whatever stage in the process, the Applicant retains the ability to seek a separate consent, as set out in the Applicant's **Response to section 89(3) letter dated 17 March 2026 [AS-063]**, with updated environmental information and assessment provided as required for the connection to the National Grid Substation at that time. **Mr. Tresadern** referred to the similar set of circumstances that arose during the examination of the Botley West DCO, where examination proceeded with the substation within the Order limits, despite NGET noting in their relevant representation for that project that this was not the NGET preferred location for this substation. In that examination, and similarly in this one, the Applicant is seeking a comprehensive consenting package that ensures both the delivery of the Scheme and its connection via the National Grid Substation in accordance with the contractual obligations. The DCO Application is seeking consent for, but not an obligation on NGET to deliver, the National Grid Substation in the proposed location. The fact that this location has not yet been confirmed by NGET does not prevent the Applicant from seeking development consent for it as an option. If NGET decides to locate the substation in another location at whatever stage in the process, then consent can be obtained in the appropriate manner for the connection works separately. **Mr. Tresadern** noted that any powers of compulsory acquisition under the DCO can only be exercised for the purpose for which they are originally sought. Therefore, if NGET decides to locate the substation at an alternative location to the land over which the Applicant has sought the necessary compulsory acquisition powers in relation to it, the Applicant could not lawfully exercise those powers over the land. In response to a point made by **James Wild MP, for North West Norfolk**, regarding the contractual obligation on the Applicant, **Dave Elvin, for the Applicant,** responded that the applicant is not yet in receipt of a Gate One offer, but that is expected and will come forward. Currently, the Applicant's grid connection contract is binding. In response to a point made by **Andrew Sierakowski, for Norfolk County Council**, regarding the Applicant's offer from NESO, **Mr. Elvin** noted the Applicant is not in receipt of a Gate One or Gate Two offer at this point in time. However, the Applicant has been notified that it will be receiving a Gate One offer. The next gate window will not be before Q3 2026. At that point in time, NESO will reassess who has accepted Gate Two offers and will review if there is any change in need. Part of the process is if NESO find one technology is undersubscribed, they might then change the limits and therefore look for more of that technology. From the information given to the Applicant by NESO, the Scheme's connection is almost certainly the next in line to receive a Gate Two offer. **Mr. Tresadern** also explained that a Statement of Common Ground is being prepared and will be sent to NESO,

		and that the Applicant hopes to receive some engagement from NESO in respect of that. ***Post hearing note:*** *This Statement of Common Ground has now been sent by the Applicant to NESO and the Applicant received an acknowledgment of receipt from NESO on 18 May 2026.* **Si Gillett, for the Applicant,** noted paragraph 3.2.6 of the new NPS EN-1 2025 which states that **i**t is not the government's intention, in presenting any of the figures or targets in this NPS, to propose limits on any new infrastructure that can be consented in accordance with the NPSs. A large number of consented projects can help deliver an affordable electricity system by driving competition, reducing costs, and amongst different technology and infrastructure types. **Mr. Gillett** further explained that the figures and targets presented in this NPS are the Clean Power 2030 capacity ranges. It is the Applicant's view that the need for the Scheme is set out in paragraphs 3.2.8 to 3.2.10 of NPS EN-1 (2025). The weight that should be attached to that need continues to apply to this DCO Application. The points discussed above, including regarding Gate One and Gate Two offers, does not degrade the need for the Scheme, as established by national policy. **Mr. Tresadern** further noted that any delay, as a result of NESO's process, should not preclude schemes from seeking consent, because if the industry waited for NESO's next steps, then nothing would come forward and address that urgent and critical national need for renewable energy. In response to a point made by **Julie Barrow, for King's Lynn and West Norfolk Borough Council,** regarding the impact of a separate planning application for the National Grid Substation, **Mr. Tresadern** responded that if such a separate application came forward, that would be subject to a completely full, robust, and comprehensive environmental assessment for that different location. The DCO Application as a whole has been assessed in full, in a robust manner, including the National Grid Substation at the proposed location. In response to a point made by **Anthony Morgan**, regarding the need for the Scheme ahead of other proposed projects, **Mr. Gillett** responded that the Applicant's position is not that this project is needed ahead of all other projects; rather, that all projects are needed. The connection reform results show that, prior to the reprioritisation process, there were over 700 GW of projects in the connections queue. The purpose of NESO's connections queue reprioritisation process was to trim that queue by retaining only projects which are ready and which are strategically aligned. Some of those 700 GW of projects have left the queue, but the Applicant does not know how many because the process is ongoing. The Scheme remains in the queue and the Applicant has been told by NESO that it will receive a Gate One offer in due course.
3.3	**Cumulative effects**	In response to points made by **Mike Bennett, for Sporle with Palgrave Parish Council**, regarding the Applicant's cumulative assessment, **Alex Tresadern, for the Applicant,** noted that the Applicant would respond to the Parish Council's Relevant Representation **[RR-054]** at Deadline 1.

		Post hearing note: *The Applicant notes that Action Point 4 of* ***[EV5-009]*** *requests the Applicant to respond to Mr. Bennett's Relevant Representation (on behalf of Sporle with Palgrave Parish Council). The Applicant has done so in the* ***Applicant's Response to Relevant Representations [APP/8.4]****.* **Mr. Tresadern** noted that the Applicant's 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, and the approach is detailed in full within **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. Further, the Scheme adopts a mitigation hierarchy to minimise cumulative impacts as far as reasonably practical. Through site evolution and iterative design, sensitive environmental receptors are avoided as much as possible, reducing the potential for in-combination effects with other developments. That 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 and 2 agricultural land, and the incorporation of buffers and green infrastructure. **Rob Pile, for the Applicant,** noted that the key concern regarding cumulative assessment appears to be the High Grove Solar Farm, which has been considered substantially by all the topic chapters within the ES. In response to a point made by **Mr. Bennett,** regarding traffic and transport (including deer crossings), **Mr. Pile** noted that the Applicant's transport team have been in dialogue with Norfolk Highways to agree the approach to the modelling on the A1065, and that approach has been agreed with National Highways and will be confirmed within the Statement of Common Ground. **Mr. Pile** noted that deer management has been a key consideration within the evolution of the design and the Green Infrastructure Parameters Plan, set out in the **outline Landscape and Ecological Management Plan (oLEMP) [APP-191]**. The crossing of the A1065 by deer was one of the key considerations of the fencing strategy, which allows for breaks in the fenceline along the A1065 to allow movement of deer across from one side to the other, so they are not running down or being prevented from crossing into the site from the other side of the A1065. The Applicant has considered that as part of its design evolution. In response to a question from **the ExA** regarding whether the risk of deer collisions has been assessed by the Applicant in its Road Safety Audit (RSA), **Mr. Pile** confirmed that the Applicant would respond to this matter in writing. ***Post hearing note:*** *The Applicant notes that Action Point 6 of* ***[EV5-009]*** *requests the Applicant to confirm if its RSA has considered the risk of collisions between deer and traffic. The Applicant notes that the probability of a deer vehicle collision is not something that sits within the scope of a Stage 1 RSA, as an RSA primarily focusses on highway design features and geometry.* *It is considered that any concerns about deer collisions would be mitigated appropriately through the alignment of any deer fencing, which is to be strategically placed to secure routes that avoid directing deer towards roads*

		and the A1065. In response to a point made by **Mr. Bennett,** regarding the Jaffa Solar development, **Mr. Pile** noted that this was not included in the Applicant's long list of cumulative developments because it did not meet the threshold criteria applied (and as set out in **ES Appendix 2.4: Cumulative Schemes [APP-136]**). **Mr. Pile** noted that, as a matter of good practice, the Applicant would review the long list during examination and update it as required, and agreed to consider including the Jaffa Solar development as part of those updates. ***Post hearing note:*** *The Applicant notes that Action Point 5 of **[EV5-009]** requests the Applicant to review its list of cumulative projects during the examination. The Applicant, as stated above, will do this at regular intervals, and will submit an updated longlist following consultation with the LPAs for Deadline 3, if not before.* In response to a point made by **Anne Mason, for Castle Acre Parish Council**, regarding the county-wide nature of the Applicant's cumulative assessment, **Mr. Pile** noted that the Applicant has undertaken a cumulative assessment in accordance with the Planning Inspectorate's guidance, including identifying the Zone of Influence for each of the environmental topics associated with the Scheme. The maximum Zone of Influence for cumulative effects to occur, in the Applicant's professional judgment, is up to 25km, which is the search area established for identifying the long list in accordance with the methodology set out in **ES Appendix 2.4: Cumulative Schemes [APP-136]**. In response to a point made by **Andrew Sierakowski, for Norfolk County Council**, regarding the East Pye Solar scheme, **Mr. Pile** noted that this project features in the Applicant's long list of cumulative developments as it was referenced in a statutory consultation response. In response to a point made by **Mark Kiddle-Morris, for Breckland Council,** regarding the Applicant's cumulative assessment, **Mr. Tresadern** noted that Breckland Council's Relevant Representation **[RR-011]** would be responded to in full in writing at Deadline 1, but that the Applicant is confident in the robustness of its cumulative assessments and the consideration of this matter in the planning balance. ***Post hearing note:*** *The Applicant notes that Action Point 7 of **[EV5-009]** requests the Applicant to respond to concerns regarding cumulative impact in Breckland Council's Relevant Representation. The Applicant has done so in the **Applicant's Response to Relevant Representations [APP/8.4].***
3.4	**Aviation**	**The ExA** queried, further to the Defence Infrastructure Organisation's Relevant Representation **[RR-051]**, how the Applicant proposes to feasibly overcome the technical objection raised, including avoiding interference with Precision Approach Radar (PAR). **Alex Tresadern, for the Applicant,** responded that the Applicant recognises the importance of this matter and the need to address the concerns raised by the Defence Infrastructure Organisation (also referred to as the

		Ministry of Defence (MOD)), particularly in the current global climate. The Applicant is therefore conducting further analysis of potential impacts upon the PAR at RAF Marham, and the results of this analysis will be used to engage further with the MOD in order to resolve this matter. Most recently, the Applicant has provided a list of assumptions to the MOD in relation to its modelling and analysis, and then the MOD is in the process of confirming those assumptions. The Applicant has also sent a draft Statement of Common Ground to the MOD and has requested a meeting to discuss the MOD's concerns and reach a solution of appropriate mitigation, which the Applicant is confident can be done. ***Post hearing note:*** *The Applicant notes that Action Point 8 of* ***[EV5-009]*** *requests the Applicant to meet with the MOD to discuss mitigation. The Applicant has been seeking to arrange a meeting with the MOD prior to Deadline 1 and has offered to meet the MOD at a location and date that is convenient for them. The Applicant has, unfortunately, not yet received confirmation of the MOD's preference for the location/date of this meeting, with the MOD only stating that they are currently seeking to confirm arrangement with relevant MOD stakeholders. The Applicant is continuing to regularly follow up with the MOD to hold this meeting at the earliest possible opportunity. The Statement of Common Ground between the Applicant and the MOD, submitted at Deadline 1, reflects the latest position of the parties in relation to the matters noted by the ExA.* **Mr. Tresadern** further noted that paragraph 102 of the National Planning Policy Framework 2024 states that planning decisions must ensure that operational sites, including defence sites, must not be adversely impacted by the impact of proposed development in the area. However, an effect can be present without adversely impacting on a defence site, and many types of development do involve factors which could alter the environment around a defence site without adversely affecting operations. The Applicant's analysis currently indicates that whilst impacts are geometrically and technically possible from the Scheme on the PAR at RAF Marham, these would not be expected to adversely affect the operations at that site. As stated, and crucially, engagement with the MOD is ongoing, and the Applicant is confident of reaching an agreed position with the MOD that leaves no adverse impact upon defence operations. **James Plumb, for the Applicant,** further stated that when it comes to assessing the impact of the Scheme on the PAR at RAF Marham, the Applicant has thus far completed initial studies based on the available information. The Applicant has requested further details from the MOD, and understands that these details will be with the Applicant shortly in order to allow for refinement of analysis and more certainty in future engagement to address the issues. **Mr. Plumb** noted that reflections can be present without adversely affecting the radar operation. Further from this, looking at the analysis, any reflective returns would be significantly weaker than the direct returns due to partial absorption by the solar panels and filtering through vegetation screening. They would occur significantly below where real returns would be expected. To give an idea of the scale of this, the PAR is designed to work with precision approach procedures, i.e. pilots approaching at angles of 2.5 degrees or 3 degrees. When

		looking at the site from the PAR, it is a vertical angle of approximately 0.3 degrees. There is, therefore, a large degree of separation between 2.5 degrees, where the Applicant would expect to see planes on the lower approach, versus 0.3 degrees, where there are views of the site. The site is solely increasing the height at that point by approximately 4m, i.e. the height of the panels. Whilst solar panels would be reflective, there will also be reflections from other sources in the area, whether that be from the ground or from passing motor vehicles on the roads that pass by the section of the site in question. There is, therefore, already an accommodation of some degree of radar reflections. **Mr. Plumb** noted that the Applicant intends to discuss with the MOD the extent to which the MOD can, with its current system, absorb or address the reflections present from the Scheme, and whether any additional mitigation would be required. **Jon Wilson, for the Defence Infrastructure Organisation**, noted that the MOD is willing to meet with the Applicant and explore the possible means of mitigating any adverse impacts. **The ExA** queried, further to the Defence Infrastructure Organisation's Relevant Representation **[RR-051]**, whether the Applicant proposes to develop a Glint and Glare Management Plan. **Mr. Tresadern** responded that the MOD have been consulted regarding impacts towards RAF Marham, and aviation receptors associated with RAF Marham are assessed within **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176]**, which concludes a low impact predicted towards the site's approach path for tracking panels. The Applicant considers this glare scenario to be operationally accommodatable. Consultation is ongoing to confirm the MOD's position, which will be addressed in the meeting referred to above. The MOD have been provided with an additional modelling addendum and further detail on predicted types, times, and durations of glare geometrically possible into the air traffic control tower that has been referenced. That modelling addendum identifies that short durations of yellow glare are predicted towards sections of the visual circuits for both fixed and tracking panel options. Yellow glare is also possible towards vertical landing pads from fixed panels only. The glare is considered by the Applicant likely to be operationally accommodatable without the need for additional mitigation. Due to the short durations of glare predicted towards the visual circuits and vertical landing pads, the Applicant does not, at this stage, consider that a Glint and Glare Management Plan is necessary, but the Applicant will discuss this with the MOD. **The ExA** queried how the Applicant considers it complies with paragraph 5.5.41 of NPS EN-1 regarding the risk of birdstrike near aerodromes. **Mr. Tresadern**, in response, quoted paragraph 5.5.41 of NPS EN-1 and noted that this states that consideration of developments near aerodromes should take into account birdstrike risk. In response to that paragraph, the Applicant notes that mitigation measures are proposed which will ensure existing bird populations are fully safeguarded. These include the ground nesting bird mitigation measures, which are predominantly for the

		provision of plots for skylark, along with the grassland managed specifically for curlew, which is all referenced in **ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]**. Other measures largely focus on the planting strategy, including the strengthening and enhancement of existing hedgerow corridors, grassland creation, and ongoing management of habitats alongside bird box provision, all as secured in the **oLEMP [APP-191]**. Furthermore, those habitat enhancements will increase foraging opportunities for small songbirds such as corn bunting, yellowhammer and linnet, and 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. Given that populations of large birds are not predicted to increase, the Scheme does not increase the birdstrike risk as a result and is therefore in compliance with the relevant paragraph of NPS EN-1. **Mr. Tresadern** also noted that the Applicant agrees with the MOD's request to be consulted regarding birdstrike hazard, and the Applicant has updated the **outline Operational Environmental Management Plan [APP-188]** at Deadline 1 to reflect this commitment. The Applicant understands that this addresses the MOD's concern in relation to birdstrike hazard, but welcomes further comment and engagement from the MOD on this matter. In response to a point made by **Andrew Sierakowski, for Norfolk County Council**, regarding the mitigation itself (technical or design-based), **Mr. Plumb** noted that for glint and glare, the mitigation (if required) depending on the panel technology. In the current Scheme design, there are options for either a fixed layout or a tracking layout. Depending on which is chosen, the tracking layout can be fixed with a purely technical solution, by fixing the tracking axis and ensuring that, at the times of day when glare is predicted, the panels are oriented such that glare is not geometrically possible. For fixed panels, the solution could also be reorienting panels, but could involve a number of other measures. Hedgerow planting would typically not be relevant for aviation considerations, simply because of the elevated view of any receptors. In relation to PAR, **Mr. Plumb** noted that it is unlikely that any sort of planting would be particularly beneficial. As much as planting can reduce the strength of reflective arrays, the Scheme's design already includes some planting on that boundary. It is therefore likely that this mitigation would be technical, which is what the Applicant is seeking to discuss with the MOD. In response to queries from **Mr. Sierakowski**, **Dr. Mark Holmes, James Wild MP for North West Norfolk** and **Mike Bennett for Sporle with Palgrave Parish Council**, regarding what the proposed mitigation would constitute, **Mr. Tresadern** noted that such discussion was premature until the Applicant and the MOD have met to discuss this matter, as referenced above. The Applicant is confident that the MOD's concerns can be fully mitigated, such that adverse impacts no longer remain and the MOD's objection can, at that stage, be withdrawn. In response to a query from **Mr. Bennett** regarding the submission of Paul Bird **[AS-064]**, which referenced the potential use of vertical panels, **Mr. Tresadern** noted that this is an unprecedented approach for ground-mounted solar farms in respect of dealing with aviation impacts and could adversely affect generating capacity.

		Post hearing note: *The Applicant has responded to Mr. Bird's relevant representation in the* ***Applicant's Response to Relevant Representations [APP/8.4]****.* In response to a query from **Mr. Wild**, regarding whether the MOD had previously opposed a solar project on the basis of an impact on PAR, **Mr. Wilson** confirmed that the MOD had done so previously. In response to a point made by **Anthony Morgan**, which suggested that the Scheme would fall below the threshold for an NSIP if some panels were required to be covered at certain parts of the day, **Mr. Tresadern** explained that the definition of an NSIP refers to the installed generating capacity of a solar farm, and therefore this would still be compliant even if panels were covered up at certain times. However, **Mr. Tresadern** also reiterated that covering the panels is, at this point, entirely speculative mitigation. **Mr. Tresadern** also agreed with a point made by **Julie Barrow, for King's Lynn and West Norfolk Borough Council,** regarding the need for further assessment once the mitigation measures have been agreed.
3.5	**Landscape and visual**	In response to submissions made by **Rebecca Collins, for Breckland Council**, and **Lynette Fawkes, for King's Lynn and West Norfolk Borough Council** (following a question from **the ExA** to those parties on this matter), regarding the number and location of the Applicant's viewpoints and visualisations, **Olli Wheeler, for the Applicant**, noted that the rationale for selection was to provide a variety of receptors within the Study Area to provide a good and robust narrative on the assessment of potential long-term significant effects that may or may not occur. The type of visualisations that was provided accords with the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) and Landscape Institute Technical Guidance Note 06/19 guidelines and meets all criteria required for those to be robust. The Applicant believes that the findings reflect what is shown within the photo montages. **Mr. Wheeler** noted that any further viewpoints and visualisations would need to be discussed with Breckland Council and King's Lynn and West Norfolk Borough Council, and the Applicant agreed to hold that meeting. It was also noted that this meeting would discuss the LVIA. ***Post hearing note:*** *The Applicant notes that Action Points 9 and 10 of* ***[EV5-009]*** *request the Applicant to meet with Breckland Council to: agree viewpoints and visualisation; and discuss the LVIA. The Applicant has been in discussion with Breckland Council since ISH1 to agree a date to meet virtually to discuss the proposed viewpoints and visualisation locations requested by Breckland Council. Discussions are still ongoing and a date will be confirmed to meet once Breckland Council re-commission their 3rd party landscape consultant 'Richards Partnership'.* In response to submissions made by **Ms. Collins and Ms. Fawkes**, regarding the boundary treatment and framed views towards the Customer Substation and the National Grid Substation, **Mr. Wheeler** noted the Applicant's proposal for a 10m wide woodland belt along the western edge of Field 27 and along the eastern side of Field 27,

		both of which would screen the taller elements of the maximum development parameters in the long-term, once the Scheme is operational and once the proposed vegetation is mature. This is secured in the **oLEMP [APP-191]**. In response to a query from **the ExA** regarding Breckland Council's comments on the Applicant's Landscape and Visual Impact Assessment (LVIA), including local character, significance, sensitivity and cumulative impacts, **Mr. Wheeler** explained that the rationale and the justification for the LVIA relies on the local landscape character assessment, through a number of fieldwork and survey visits that were undertaken, a desk-based study of existing baseline information and a review of the proposals alongside them. The Applicant concluded that this landscape character assessment remains applicable and applies to the modern-day baseline. With regard to significance, **Mr. Wheeler** referred to the methodology outlined within **ES Chapter 6: Landscape and Visual [AS-017]**, which states that significance is a combination of magnitude and sensitivity, and therefore is graded upon a scale that is graphically shown within the methodology and does not have a definition as such. With regard to sensitivity, **Mr. Wheeler** noted that the sensitivity assigned to all Visual Receptor Groups (VRG) within the LVIA are dictated using the LVIA methodology included within the landscape chapter. This methodology was used for the various VRGs identified, including correctly identifying VRG1 as high to medium sensitivity. With regard to cumulative landscape character effects, **Mr. Wheeler** noted that the methodology for cumulative landscape character was a consideration within the LVIA itself, with High Grove Solar Farm being the predominant and main proposed development that would have likely or potential significant cumulative effects. This is a result of a sifting process, and this was the only proposed development that was included within the assessment. The findings of which were that in the long-term, and through all stages, there were potential long-term significant character effects on LCA E6, which is within the Order limits of the Scheme and also the abutting land, which falls within High Grove Solar Farm. There were no significant cumulative visual effects deemed in the long-term; only those identified during construction and decommissioning phases on VRG4. In response to a concern raised by **Ms. Collins** that the LVIA relied only upon district-level landscape character areas, rather than local character areas, **Mr. Wheeler** noted that the LVIA acknowledges and judges that the local landscape character assessments that are published, which are a material consideration, have enough detail and are still relevant with regard to the baseline conditions and are therefore sufficient for the LVIA to be undertaken. It was judged that there was no need to provide further granular local landscape character areas on this basis, primarily because the existing published documents are still relevant. In response to a further concern from **Ms. Collins** regarding the use of the Breckland Landscape Character Assessment from 2007, **Mr. Wheeler** noted that with regard to LCA D1 and LCA E6, which are the primary landscape character areas which extend beyond the Order limits and the Study area, it was deemed that the baseline conditions are still applicable, and so these were taken forward in the LVIA. **Mr. Wheeler** explained that

		albeit this document is from 2007, it was verified through a number of site visits and baseline photography, and more granularity was given in the baseline description within the LVIA to accommodate for any minor changes there may or may not have been. **The ExA** raised four queries contained in Norfolk County Council's Relevant Representation **[RR-043]**: landscape characteristics identified in the baseline are not consistently reflected in the resulting judgments; the assessment of landscape value placing emphasis on the absence of formal designation, which may underplay the experiential and recreational qualities; the understatement of the experience of users of Public Rights of Way (PROW) and promoted routes; and the certainty, timing and effectiveness of proposed landscape mitigation measures. Taking these points in turn, **Mr. Wheeler** first explained that the Scheme does not propose to remove any large-scale landscape features that would affect the character, both locally nor regionally. The Applicant is proposing two 10m wide woodland belts that would enhance the wooded character in proximity to Bartholomew's Hill Plantation. In relation to formal designation, **Mr. Wheeler** noted that the LVIA fully evaluates landscape value, and that evaluation breaks down the different dimensions of landscape value with regards to appropriate guidance. It considers all elements of landscape value and rates them on the association of the methodology used for the LVIA. With regard to PROW users, **Mr. Wheeler** noted that the DCO Application was submitted with not only an LVIA, but also with an amenity and recreation assessment. This considered the amenity resources and recreational routes within the Order limits and the wider Study Area. From a landscape and visual perspective, he effects of those were documented within the conclusions and the tables in the LVIA, with only one perceived significant effect being during construction and decommissioning on one PROW to the east of the Order limits. As for certainty of mitigation, **Mr. Wheeler** noted that the mitigation proposed is secured in the **oLEMP [APP-191]**, the **outline Operational Environmental Management Plan [APP-188]** and the **outline Decommissioning Strategy [APP-190]**. These mitigation measures include offsets from sensitive receptors, enhancement and retention of existing landscape features, the planting of new woodland belts within Field 27, and the enhancement of the recreational baseline through the provision of new permissive routes up to 3.5km long throughout the land which is not publicly accessible. **Mr. Wheeler** also noted, in response to points made by **Ms. Fawkes** and **Andrew Sierakowski, for Norfolk County Council**, regarding the mitigation proposed, that this is largely associated with existing boundary features and/or typologies present within the site. The only element that does not align with that is the new woodland stretch that the Applicant is proposing in Field 27, but this is also characteristic of the nearby plantation woodlands and sits alongside reinforced hedgerow and tree belts that are within the Order limits. **The ExA** queried, quoting from **ES Chapter 17: In-Combination Effects [APP-066]**, what design measures could be proposed by the Applicant as additional mitigation, and how these would reduce the adverse effects identified. **Mr. Wheeler,** in response, noted that the DCO Application included a residential visual amenity

		assessment, which concluded that there would be no overbearing or oppressive effects on any residential property within the Study Area (which included a number of properties offset from the Order Limits). The only residential dwelling that is within the Site is Keeper's Cottage, which has been offset and therefore prevented any residual effects on this dwelling. **The ExA** asked for confirmation of the distance of the offset for Keeper's Cottage, which **Mr. Wheeler** said the Applicant would provide in writing. ***Post hearing note:*** *The Applicant notes that Action Point 12 of* ***[EV5-009]*** *requests the Applicant to confirm the offset for Keeper's Cottage. The Applicant can confirm that the minimum distance between the domestic curtilage (southern edge of the domestic garden) and the nearest proposed Solar PV Array development area, within Field 11 to the south, is 58m. There is mitigation planting proposed between Keeper's Cottage and the nearest proposed Solar PV Array development area.* In response to points made by **Anne Mason, for Castle Acre Parish Council**, regarding the topography of the landscape surrounding the village and the negative impact on visual landscape caused by the Scheme, **Mr. Wheeler** responded that accompanying the LVIA was a number of photomontages, both parameter-based (which showed the maximum design parameters) and photorealistic (which included an indicative scheme set within the baseline conditions of the site). With specific reference to Castle Acre, a lot of visual mitigation is embedded within the local landscape at present, and therefore the siting of larger infrastructure to the south of Bartholomew's Hill Plantation is barely perceptible, as shown in the photomontages. In response to points made by **Mike Bennett, for Sporle with Palgrave Parish Council**, regarding the adequacy of the LVIA and mitigation, **Mr. Wheeler** noted that much thought and consideration was given to the LVIA, which the Applicant considers to be robust and in accordance with industry guidance and standard practice. Several site visits were undertaken to ensure that an accurate baseline was recorded. With regard to direct effects on Peddars Way, **Mr. Wheeler** noted that the LVIA concluded there would be no long-term significant visual impacts along that route. This route was assessed as a standalone route to note its increased sensitivity, due to its national recreational value. Further, the only cumulative visual impact that could be potentially significant is along a singular PROW within VRG4 to the east of the site, during the construction and decommissioning of the Scheme alongside High Grove Solar Farm. With regard to solar panels and views from the castle, **Mr. Wheeler** noted that there is potential visibility of solar panels from the castle, which has been reflected in the assessment, but this has been concluded to be not significant. **Alex Tresadern, for the Applicant,** spoke more broadly about the assessment, noting that the mitigation hierarchy has been applied throughout the design and development of the Scheme's landscape, and visual impacts have been minimised as far as practicable. Through the application of good design principles, including the application of that mitigation hierarchy, a robust approach to secure good design would be achieved. Despite that approach, some significant residual visual effects would remain for two landscape receptors. However,

		paragraph 5.10.14 of NPS EN-1 states that the Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents and other receptors, such as visitors to the local area, outweigh the benefits of the project. Paragraph 5.10.35 of the same NPS confirms that 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. **Mr. Tresadern** noted that with the critical and urgent need for the Scheme enshrined in both national and local policy, it is considered by the Applicant that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and need case in accordance with paragraphs 5.10.12, 5.10.14, and 5.10.35 of NPS EN-1. Further, the Secretary of State is to consider, under paragraph 5.10.36 of NPS EN-1, whether significant residual adverse impacts are temporary, and the majority of identified residual adverse landscape and visual effects are of a temporary nature. The Secretary of State must also take into account the reversibility of the Scheme and its associated residual adverse effects. The Applicant notes that these residual adverse effects are localised. As set out in section 10 of the **Planning Statement [APP-043]**, it is considered by the Applicant that the wider benefits of the Scheme as critical national priority infrastructure, delivery of a significant level of low-carbon energy generation and biodiversity net gain, and the provision of permissive paths, outweigh the adverse residual effects of the Scheme. The Scheme is considered acceptable in terms of its overall landscape, visual, and residential amenity impacts, and the nature of these visual impacts is not considered to outweigh the substantial benefits of the Scheme. On balance, and in accordance with paragraph 5.10.35 of NPS EN-1, this conclusion has been reached in the context of careful and sensitive design approach adopted for the Scheme. Whilst the Applicant has concluded that the landscape and visual impact should be afforded moderate negative weight in the planning balance, it is considered by the Applicant that the Scheme remains acceptable in terms of those overall impacts. In response to points made by **Mr. Bennett**, regarding the opportunity to come together with local residents to discuss community benefits and mitigation, **Mr. Tresadern** agreed to the discussions and confirmed that the Applicant is happy to engage with the Parish Councils, and all residents, at all stages of the Scheme, whilst reiterating the urgent and critical need for the Scheme. ***Post hearing note:*** *The Applicant notes that Action Point 13 of* ***[EV5-009]*** *requests the Applicant to engage with Parish Councils on the subject of community benefits. The Applicant is open to such engagement, both during the examination and (as may be more relevant in relation to the distribution of the Community Benefit Fund) post-consent, if the Scheme is granted.* **Mr. Wheeler** also explained that the Applicant has acknowledged the potential effects both from a standalone and cumulative perspective. The Applicant is continuing to engage with the developer of the High Grove Solar

		Farm in relation to any mitigation, enhancements or additional planting. In response to a point made by **Ms. Fawkes**, regarding nighttime lighting, **Mr. Wheeler** stated that the Applicant has scoped out nighttime impacts, because it was deemed that there would not be any significant nighttime vision impacts as the Scheme is largely unlit. As referenced within the **outline Operational Environmental Management Plan [APP-188]**, any proposed lighting associated with maintenance or security would be very limited. The Applicant considers that the Scheme, and the mitigation proposed, does not contravene the local dark sky policy within the Castle Acre Neighbourhood Plan 2022, which outlines that the Scheme should limit light spillage and all unnecessary forms of artificial outdoor lighting – the Scheme does this, as it does not include any unnecessary artificial forms of outdoor lighting that are unnecessary. The Scheme is also compliant with paragraph 187 of the National Planning Policy Framework 2027. **Mr. Tresadern** noted that, in relation to fencing, the Applicant's insurance documents require fencing to secure the Site. In response to a point made by **Anthony Morgan**, in relation to waste, **Mr. Tresadern** referred to the **outline Soil Management Plan [APP-193]** and the **outline Decommissioning Strategy [APP-190]** as examples of documents within which mitigation measures are secured. 1.1 In response to a query from **Ms. Mason**, regarding archaeological watching briefs, **Paul Gajos, for the Applicant**, explained that an outline scheme of archaeological works is in place **ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161]**, which gives an outline of the various methodologies that will be employed for mitigating any archaeological impact. Some elements may have a watching brief, but where there are areas of large-scale stripping, there will be more formal archaeological excavations which depend, in turn, on what is actually present. There is a further program of evaluation that is led by specific impacts, which identifies which of the outline mitigation measures will be employed. **Mr. Gajos** also noted that the provisions remain subject to the agreement of Norfolk County Council's archaeological advisor.
3.6	**Cultural heritage**	**The ExA** asked, with reference to Historic England's Relevant Representation **[AS-060]**, if the Applicant could: comment on the adequacy of the assessment of the contribution setting makes to significance in relation to Castle Acre Castle and Castle Acre Priory in the ES; explain how the significance of the conservation area has been considered; and explain the assessment of the level of harm in relation to Castle Acre Castle and Castle Acre Priory. **Paul Gajos, for the Applicant**, responded that with regards to the assessment of setting and its contribution to significance, the Applicant recognises that per paragraph 5.9.10 of NPS EN-1, the Applicant should provide a description of the significance of the heritage asset and include any contribution made by its setting. This is found

		in **ES Chapter 8: Cultural Heritage [APP-057]** and **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]**, which establish the significance of any affected heritage assets, including the contribution of setting to that significance. When assessing significance of heritage assets, the contribution of setting cannot be taken in isolation, but rather is focused on what the setting adds to the significance of the asset as a whole. This principle is highlighted in paragraph 5.9.3 of NPS EN-1, which notes that a heritage asset's significance derives from the sum of its interests, and therefore a heritage asset's significance derives from both its physical presence and its setting. In almost all cases, the vast bulk of a heritage asset's significance will be vested in its physical fabric, with setting playing an important, yet distinctly secondary, role in that significance. This Applicant considers this to be true for both Castle Acre Castle and Priory. The assessment of significance undertaken in **ES Chapter 8: Cultural Heritage [APP-057]** and **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]** has been undertaken in accordance with "Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment" published by Historic England. In the production of this setting assessment, the Applicant received information from Natural England, the Norfolk Historic Environment Record, the Norfolk record office for historic maps and plans, and bespoke viewshed analysis. This was all backed up with a number of site visits, both to assess the contribution of setting to significance and to confirm the results of the viewshed analysis. With regards to the contribution of setting to the significance of Castle Acre and the Priory, **Mr. Gajos** noted that the setting of the Castle and Priory are presented in detail in **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]**, and summarised in **ES Chapter 8: Cultural Heritage [APP-057]**. The east-west axis, which links the castle, the settlement, the church, and the priory, provides the most context to the monument, and is therefore considered to be the key element of the setting of both the Castle and the Priory. Whilst visual appreciation of that element of setting is somewhat restricted from the monuments themselves, which book-end the village particularly in the summer months when trees are in leaf, the importance of the setting is not confined to visual considerations. As expressed within **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]**, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. **Mr. Gajos** noted further that this is certainly the case with both the Castle and the Priory, which have an intimate relationship with each other and the village in between. The scheduled portion of the Castle also includes the town defences, which enclose the core of the historic settlement. As laid out in "Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment" by Historic England, the importance of setting is what it adds to the significance, i.e. the experience that leads to understanding and appreciation of the asset. Contextual aspects of the setting, therefore, can be considered to make a greater contribution as they actually inform what is important, rather than mere aesthetics, where it is as much the landscape that is being appreciated as the asset itself, and it is for this reason that the east-west axis between the Castle and the Priory is considered to be the most important

		aspect of those assets' setting. When considering the wider settings of the Castle and Priory, the contribution of the settings and their significance varies – different aspects contribute to the Castle and the Priory. In terms of the Castle, the views to the south recognise its importance in terms of illustrating the topographical importance of the Castle, with its strategic defensive position, and that is outlined in **ES Chapter 8: Cultural Heritage [APP-057]** and **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]**. However, within those views, the individual elements which would provide context to that strategic position, such as being able to discern the roads, are quite difficult to realistically discern when stood upon the Castle. **Mr. Gajos** further stated that the contextual relationship between the Castle and the Priory is lessened in views to the south given that the views do not encompass contemporary monuments. The landscape being looked out on, from these assets, does not contain the contemporary elements in the east-west axis. It is, therefore, considered that it is of lesser contribution to the significance of the assets. The Priory was never reliant on the strategic defensive positioning (unlike the Castle) and therefore the views to the south are appreciated for different reasons. The Priory is more linked to the Nar Valley and its connection with various religious communities along the Nar Valley, as well as the transportation route provided. It is accepted within the Applicant's assessment that the views of the surrounding countryside from both the Castle and the Priory do make some contribution to the significance of the monuments through aiding the aesthetic of the monuments in addition to understanding topographic considerations for their sighting. The aesthetics are considered secondary to contextual setting, in part because the question arises with these of whether it is the heritage interest of the asset that is being experienced, or if it is the landscape itself being appreciated, albeit from a historic vantage point. Historic England's guidance expresses caution when prescribing significance to views, stating that views can be valued for reasons other than their contribution to heritage significance, including (for example) appreciation for the wider landscape where there may be little or no association with the heritage assets. Both **ES Chapter 8: Cultural Heritage [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 and Priory, in relation to the Nar Valley, includes elements to the east, west and south which contribute to the significance of the monument. However, the parts of the Order limits that are visible from the monuments do not contain any contextual elements that are considered key to the understanding and appreciation, i.e. they do not contain any contemporary monuments, rather they sit behind the major approaches to Castle Acre and do not facilitate any meaningful views of the monuments. In terms of any aesthetic contribution, **Mr. Gajos** noted that the visible parts of the Order limits only form a small part of a much wider vista and are located at the extremities of the views between the Order limits and the monuments, with expanses of countryside in between. These are illustrated in Figures 8 and 9 of **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]**. It is clear that the Order limits only form a small part

		of the views that add to the aesthetic appreciation of the monument, rather than the contextual setting. When assessing significance of the monument as a whole, it is also clear that the bulk of that significance is vested in the physical remains which retain a very high level of evidential value and archaeological interest and that the contribution of setting, though still considerable, is secondary to the physical elements. The contribution of the setting itself is not uniform and the contextual elements are considered to contribute much more to significance than aesthetic elements, and as such the Order limits are only a relatively minor element in terms of the contribution to the significance of both the Castle and the Priory when assessed as a whole. In relation to the significance of the conservation area, **Mr. Gajos** noted that the criteria for assessing sensitivity or value (which equates to significance in EIA terminology) is clearly defined in Table 8.1 of **ES Chapter 8: Cultural Heritage [APP-057]**. The reason for assigning conservation areas, including Castle Acre conservation area, as medium value (as opposed to high value) is as has been addressed above in relation to setting considerations, i.e. when assessing significance of heritage assets as a whole rather than individual elements, so it does not necessarily follow that the whole of a conservation area should be ascribed a high level of significance as it contains many assets of lesser significance and areas or buildings of no heritage significance at all. **Mr. Gajos** noted that the criteria that was used in determining the sensitivity and significance of Castle Acre conservation area is the same as that was presented both at the scoping and Preliminary Environmental Information Report (PEIR) stages, which was agreed by all relevant parties. At that stage, Historic England agreed with the medium value ascribed. Further, paragraph 5.9.31 of NPS EN-1 discusses assets of the highest significance, which is stated as including scheduled monuments, protected sites, registered battlefields, Grade I and II* listed buildings and Grade I and II* registered parks and gardens, and world heritage sites. Conservation areas are not included in that list of assets of the highest significance. When assessing the significance of the contribution of setting to the significance of the conservation area, it does not follow that the contribution of the significance of individual heritage assets within the conservation area extends to the whole conservation area, and it is for those reasons that paragraph 8.8.65 of **ES Chapter 8: Cultural Heritage [APP-057]** differentiates between views from individual assets and their contribution to the conservation area. **Mr. Gajos** reiterated that, in relation to views of the Order limits, the conservation area contextual elements are lacking, and in aesthetic terms they form a small aspect at the periphery of views that are not key to the significance of the conservation area. In relation to the assessment of harm, **Mr. Gajos** noted that an assessment of the significance of assets as a whole is considered. With respect to the Castle, the vast majority of that significance is contained in its physical form; setting is only a fraction of that overall significance. The contribution of the Order limits to the setting that contributes to the level of significance is only a very small part of that. The changes brought about by the Scheme are relatively minor, in terms of the overall setting, which is how the Applicant arrived at the conclusion of a low

		level of impact. **Mr. Gajos** also noted that the impacts identified are articulated in of **ES Chapter 8: Cultural Heritage [APP-057]**; paragraphs 8.8.33 to 8.8.37 in relation to the Castle, and paragraphs 8.8.39 to 8.8.42 in relation to the Priory. It was agreed with Historic England that, in terms of substantial or less than substantial harm, high impacts are considered substantial and anything moderate or lower is considered less than substantial. In response to points made by **Lynette Fawkes, for King's Lynn and West Norfolk Borough Council**, notably suggesting that the level should be ascribed as moderate because of the significance of the setting of the Castle, **Mr. Gajos** responded that he disagreed with this conclusion because, with the strategic level of the site for the Scheme, the strategic position of the Castle can still be appreciated with or without the presence of solar panels. From the position at the end of where these solar panels will be within the site, and with the Castle in its current form, it is difficult to see the Castle, particularly in summer when trees are in leaf. The appreciation of the topography and the Castle's landscape setting is not affected by the presence of solar panels. **Mr. Gajos** also noted that even if a moderate level was ascribed, this would still constitute less than substantial harm, which **Ms. Fawkes** (and Historic England) agree with. In response to a further point from **Ms. Fawkes**, which stated that as one comes up and over the ridge of the A1065 there would be solar panels to the left-hand side at the same time as one gets an appreciation of Castle Acre as a village, **Mr. Gajos** responded that this remains a considerable distance away – some 2.5-3km – with detail not being visible until much closer (at which point the solar panels are not visible). With that distance, any change in agricultural landscape does not have a moderate level of impact. The parties agreed to disagree on this matter. In response to points made by **Anne Mason, for Castle Acre Parish Council**, regarding consideration of the long-term harm to this historic environment, **Mr. Gajos** stated that the Applicant is confident in the robustness of its assessment and, with respect to the settlement pattern, the field pattern and the road systems, none of these are at risk from the Scheme – these are all being preserved as part of the Scheme. **Mr. Gajos** also addressed **Ms. Mason's** query regarding construction lorries by referring to **ES Chapter 9: Transport and Access [APP-058]**, which concludes no risks to the relevant roads from construction traffic. In response to a similar point from **Tim Hubbard, for Castle Acre Parish Council**, regarding the significance of various aspects of the assessment, **Alex Tresadern, for the Applicant**, responded that the parties have agreed to disagree on this matter but reiterated that the Applicant's assessment is robust and in compliance with local and national policy. Further, the critical and urgent need for the Scheme must be considered, particularly given the agreed level of 'less than substantial harm' on the relevant assets (even if, as stated above, moderate impact is ascribed to these). In response to points made by **Dr. Mark Holmes** regarding the scale and design of the Scheme in this context,

		Rob Pile, for the Applicant, noted that good design has been an important part of the Scheme's evolution, and the design principles considered are set out in the **Design Approach Document [AS-009 to AS-011]**. One of those design principles is specifically focused on, and recognises, the importance of the Nar Valley and its setting. During consultation, the design of the Scheme has evolved directly in response to the heritage settings along the Nar Valley. The Applicant has responded to concerns and issues raised by local residents; in particular, the Applicant removed solar panels from Field 35 and the northern part of Fields 33 and 32, which sit on the valley slopes of the Nar Valley and were those which were most exposed to heritage assets. The Applicant has, therefore, responded to some of those concerns raised. **Mr. Pile** also stated that construction traffic has been a key consideration of the design process, including recognition of the importance of Fincham Drove. The Applicant is committed to not using Fincham Drove as a construction traffic route, albeit it must be briefly crossed to enable access – the Applicant is limiting that crossing to two points only. The internal routing for construction traffic will be from the A1065 through the site, to avoid using the local narrow roads for construction traffic, which limits any potential disruption for local users of those routes and/or any potential damage to those routes during the construction phase. These are, therefore, design elements embedded within the Scheme by the Applicant to minimise potential effects as far as possible. **Mr. Tresadern** also noted that, whilst this is not a consideration for the DCO process, the Applicant has committed to providing a Community Benefit Fund as part of the Scheme. Views would be welcomed on what this money could go towards, including road improvements. The Applicant is happy to engage with the Castle Acre Parish Council, and all residents, regarding community benefits. ***Post hearing note:*** *The Applicant notes that Action Point 13 of* ***[EV5-009]*** *requests the Applicant to engage with Parish Councils on the subject of community benefits. The Applicant is open to such engagement, both during the examination and (as may be more relevant in relation to the distribution of the Community Benefit Fund) post-consent, if the Scheme is granted.* In response to a point made by **James Wild MP, for North West Norfolk,** regarding Historic England's submissions, **Mr. Tresadern** noted that the Applicant had understood that the methodology used was agreed by Historic England during the PEIR stage of the Scheme, but that it is now engaging with Historic England via the Statement of Common Ground to reach agreement again.
3.7	**Flood risk and water resources**	**The ExA** asked, with reference to the Environment Agency's Relevant Representation **[AS-062]**, if the Applicant could explain how it proposes to address the Environment Agency's comments on the accuracy of the Applicant's hydrogeological model. **Liam Nevins, for the Applicant,** noted that the conceptual groundwater model presented in **ES Chapter 12:**

		Water Resources [APP-061] uses 18 groundwater monitoring boreholes in the wider study area, being 5km from the Order limits, to generate a maximum elevation for groundwater. The proposed approach for this was discussed with the Environment Agency in September 2025. The interpolated groundwater surface derived from a triangulation process provides a relatively reasonable and accurate estimate of groundwater levels within the Order limits. However, flow patterns are less reliable in this regard, because the model relies on some assumptions, principally that topography plays a large part in deriving groundwater elevation. Where there are sharp changes in elevation, groundwater levels change relatively dramatically in that regard. The Applicant has been made aware that the Environment Agency has a groundwater model for the relevant region, which is the Northeast Anglian Chalk groundwater model, and the Applicant has held meetings with the Environment Agency to discuss obtaining the data which pertains to that particular model, so that the Applicant can validate its own groundwater flow and elevation data which informed the assessment in the ES. **Mr. Nevins** confirmed that the requested data was provided by the Environment Agency on 6 May 2026 (i.e. one day before ISH1) and, upon initial and preliminary reflection, the worst-case scenario provided by the Environment Agency in relation to the highest elevation within the groundwater model is less conservative than the elevations used by the Applicant, i.e. the Applicant has used a greater worst-case scenario. Some of the flow directions are different, due to the limitation of the methodology used, but the assessment does not principally rely on flow direction as a sole indicator of risk. The Applicant has assessed abstractions at Marham to the west and, as such, indicates that groundwater would flow in that direction. However, the assessment concludes that there are no significant effects predicted for that particular abstraction and those to the north. In response to points made by **Morgan Harringman, for the Environment Agency,** regarding the location of the Scheme within a Source Protection Zone 1, **Mr. Nevins** noted that this constraint was identified at an early stage and the Applicant has design the Scheme such that the elements which have the most potential for polluting effects, such as the BESS and the National Grid Substation, are sited outside of this Source Protection Zone 1, with only solar panels remaining in that particular zone. **The ExA** asked the Applicant to describe its approach to addressing the concerns of Norfolk County Council, as Lead Local Flood Authority (LLFA), in regard to **ES Appendix 12.2: Flood Risk Assessment [AS-054]**. **Mr. Nevins** responded that the Applicant has been in dialogue with the LLFA and will continue to work with the LLFA to resolve all matters raised via the Statement of Common Ground between the parties. The Applicant is confident that, through a combination of clarifications and updated reporting, the outstanding points will be resolved in a timely manner during the examination. **The ExA** sought clarification on why Work Nos. 2-4 needed to be located within the model areas of higher surface water flood risk.

		In response, **Mr. Nevins** noted that a 2D rainfall model conducted by the Applicant confirmed an Environment Agency surface water pathway on the very western extremity of Work Nos. 2-4. As with the assessment in **ES Chapter 12: Water Resources [APP-061]**, the Applicant has adopted the Rochdale Envelope approach in terms of assessing the maximum extents for these works, and it is outlined within **ES Appendix 12.2: Flood Risk Assessment [AS-054]** that during detailed design, the Scheme can be designed to avoid that particular surface water pathway, rather than maximising the entire area of the relevant Work Nos. The relevant elements of the Scheme can be located outside of that particular fluvial pathway and do not need to be located there for operational reasons. In response to a point made by **Mike Bennett, for Sporle with Palgrave Parish Council**, regarding surface water runoff and erosion, **Mr. Nevins** stated that the **oLEMP [APP-191]** commits to advanced sowing of the Scheme prior to construction, and, as such, there will be adequate time for grassland to establish prior to the installation of solar panels. Therefore, there should not be a situation whereby rainfall is falling onto bare earth. With respect to bare earth and erosion, **Mr. Nevins** stated that it can occur if there is rainfall falling on bare ground. However, the **outline Soil Management Plan [APP-193]** outlines remediation measures to be put in place if there are instances of bare ground following the construction period to re-sow, scarify, and ensure that any particular bare patch is reinstated with grassland. Runoff is not expected to be worse than the current baseline agricultural scenario. **Mr. Nevins** also notes that NPS EN-3 encourages the use of natural flood management through grassland for solar, and notes that as rainfall is falling onto ground, runoff is not expected to be substantial from solar. In response to a point made by **Dr. Mark Holmes**, regarding concreting and flash flood risks, **Mr. Nevins** noted that the only elements of hardstanding for the Scheme are the BESS and substation areas, and the Applicant has committed to have a sustainable drainage system installed for those aspects to cope with the standard one in 100 year plus 40% climate change allowance. This will attenuate that heavy downpour, hold that water back, and then put it into a dedicated infiltration basin. Infiltration testing has been undertaken at that targeted area, and it has been proven that infiltration is a viable option for surface water disposal. Water will not be cascading off the site from those particular aspects of the scheme. **Mr. Nevins** also referred to his point above regarding solar and runoff and the management of those through grassland. In response to a point made by **Andrew Sierakowski, for Norfolk County Council,** regarding the increase of impermeable areas and a larger surface area of attenuation, **Mr. Nevins** stated that the parameters for the drainage scheme outlined in **ES Appendix 12.2: Flood Risk Assessment [AS-054]** assumed 100% impermeability for the particular areas for the BESS and substations, and, as such, assessed a worst-case scenario. There is still space within the Scheme to provide attenuation for that particular scenario, and there will be space during the detailed design to accommodate the potential increase in concrete pads for the BESS.

		In response to a query from **Tim Hubbard, for Castle Acre Parish Council**, regarding cooling the BESS, **Mr. Nevins** confirmed that there is no water cooling required for the BESS. **The ExA** asked how that cooling would take place, to which **Mr. Nevins** responded that cooling is simply via air and circulation, with water only required for cooling in the unlikely event of a battery fire. In response to a query from **Anthony Morgan**, regarding the management of wastewater, **Mr. Nevins** replied that wastewater will be dealt with via wheel-washing facilities, then treated and either discharged to ground or taken off site. Waste from other facilities will also be taken off site, as per standard practice. In response to a query from **Dr. Holmes**, regarding the washing away of soil towards the Nar Valley, **Mr. Nevins** noted that the **outline Soil Management Plan [APP-193]** outlines measures to deal with stockpiles and surplus soils to ensure that they are stable, which includes vegetating the surfaces. This would prevent the washout from propagating further downstream into the River Nar. In response to a query from **Mr. Hubbard**, regarding the storage of water on site, **Mr. Nevins** stated that there will be water stored on site as a precautionary provision for firefighting, in two dedicated tanks, the sizing of which is outlined in **ES Appendix 12.2: Flood Risk Assessment [AS-054]** and which follows the National Fire Chief Council's guidance of 228 cubic meters, allowing for 1,900 litres per minute to be applied to the adjacent unaffected battery containers.
4	**Next steps**	**The ExA** set out the action points arising from ISH1, before closing the hearing. ***Post hearing note:*** *The Applicant notes that these action points have subsequently been published in* ***[EV5-009]****, and the Applicant has responded to each of the actions (with the exception of Action Points 11 and 14, as these were not directed to the Applicant) throughout the table above, as referenced.*

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