



Norfolk County Council

Deadline 2 Submission

The Drovers Solar Farm (EN0110013)

Deadline 2: 19th June 2026

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1. Glossary of Acronyms

ASI	Accompanied Site Inspection	LHA	Local Highway Authority
DCO	Development consent order	LLFA	Lead local Flood Authority
ESSCS	Employment, Skills and Supply Chain Strategy	LIR	Local Impact Report
ExA	Examining authority	NCC	Norfolk County Council
FRA	Flood risk assessment	NSIP	Nationally significant infrastructure project
HER	Historic environment record	oBSMP	outline Battery Safety Management Plan
HGV	Heavy goods vehicle	OFH	Open Floor Hearing
ISH	Issue Specific Hearing	RR	Relevant Representation
LGV	Light Goods Vehicle	WR	Written Representation

Introduction

2. Deadline 2 Submission

2.1. This document sets out Norfolk County Council's ("NCC's" or "the County Council's") Deadline 2 submission in relation to The Drovers Solar Farm Development Consent Order ("DCO") application. It provides comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2, as set out in the Examining Authority's ("ExA's") Rule 8 letter of 13th May 2026.

2.2. Deadline 1 required submissions by 2nd June 2026, and included the following items:

- comments on relevant representations (RR) and additional submissions;
- responses to ExQ1;
- Local Impact Reports (LIRs) from local authorities;
- written representations (WR) from interested parties and summaries of any that exceed 1500 words;
- written summaries of any oral representations made at open floor hearing 1 (OFH1) and issue specific hearing 1 (ISH1);
- the applicant's draft itinerary for ASI;
- the applicant's updates – refer to Rule 6 letter, Annex F [PD-006];
- requests to be heard at a further open floor hearing;
- requests by affected persons (defined in s59(4) of the Planning Act 2008) to be heard at a compulsory acquisition hearing; and
- Any further information requested by the ExA under rule 17 of the Examination Procedure Rules.

2.3. The comments set out in this submission are made by the County Council in its capacity for a range of statutory and non-statutory responsibilities to provide services and discharge regulatory functions including, among other things, as:

- Minerals and Waste Planning Authority;
- Local Highway Authority ("LHA");
- Responsibility for Public Rights of Way;
- Lead Local Flood Authority ("LLFA");
- Fire and Rescue Service;
- Local Authority with public health responsibilities;
- Provider of archaeological services; and
- Maintaining Norfolk's Historic Environment Record ("HER").

- 2.4. NCC has considerable experience of nationally significant infrastructure projects (“NSIPs”). Ten projects with order limits within Norfolk have been consented to date. Five more are currently at a Pre-application or Application stage.

3. Scope of Comments

- 3.1. The updated Examination Library shows that 108 additional or amended documents were submitted at Deadline 1, of which 73 were submitted by the Applicant, The Drovers Solar Farm Limited, with a number of these extended to more than 100 pages. In light of this County Council, considers that the Deadline 2 submission date has provided a wholly inadequate period of time within which to review and provide comments on the additional submissions, and particularly those from the Applicant. During that period (eighteen days), the County Council has had to make a submission or prepare substantive responses of two other concurrent DCO applications, East Pye Solar (EN0110014) and Eastern Green Link 3 and Eastern Green Link 4 (EN0210003). In the circumstances the County Council wishes to make clear that it considers that the time allowed for Deadline submissions in relation to the comments on The Drovers Solar Farm Deadline 1 submission, has been inadequate and prejudicial to the County Council and other parties.
- 3.2. The county has not been able to fully review, consider and prepare full response to the Deadline 2 submissions. Accordingly, the following submission sets out only a limited set of comments from the County Council, and it reserves the right to make additional comments at a later stage. Comments are set out in order listed in the County Council’s Local Impact Report (“LIR”).

Comments by issue

4. Impacts of the Proposed Project – Strategic Comments

- 4.1. The County Council has not yet had sufficient time to review the Applicant’s additional submissions in relation to the matters set out in its LIR under the heading of “Impacts of the Proposed Project – Strategic Comments”. It therefore reserves the right to provide additional comments at a later stage.

5. Landscape and Visual

- 5.1. The County Council has not yet had sufficient time to review the Applicant’s additional submissions on landscape and visual impact. It therefore reserves the right to provide additional comments at a later stage.

- 5.2. It remains concerned that it will not be possible to mitigate much of the landscape impact and it agrees comments received about the visualisations, that providing dotted lines on a photograph does not adequately represent the impact.

6. Ecology and Biodiversity

- 6.1. The County Council has not yet had sufficient time to review the Applicant's additional submissions in relation to ecology and biodiversity. It therefore reserves the right to provide additional comments at a later stage.

7. Archaeology

- 7.1. The County Council has not further comments at this stage.

8. Traffic and Transport

- 8.1. He County Council has, given the limited time available, the following detailed comments at this stage:
- 8.2. In relation to the outline Construction Traffic Management Plan [[REP1-052](#)], Figure 2.1 Access points I (River Road) and H (Fincham Drove) the County Council requests that clarification be provided as to whether these are a crossing to get to the Western extents of the scheme, or will they provide a primary access point as indicated in T2.1, like A/B/C.
- 8.3. In relation to Figure 4.1, while the description states that Route C is not to be used by Heavy Goods Vehicles ("HGVs"), requests that clarification be provided about it is proposed that Light Good Vehicles ("LGVs") will use this route? If so, could anticipated traffic numbers be provided to allow assessment. If all construction traffic is intended to use the main access points on the A1065, it would it is recommended that Route C be removed from the proposals.
- 8.4. Paragraph 5.2.1 states that "Highway Condition Surveys will be carried out on the relevant roads proposed for construction access prior to commencement of construction". However the County Council notes that no methodology for highway surveys has been provided.
- 8.5. Paragraph 5.3.6 states "It is noted that during construction of the overhead line works, there may be a need to temporarily close Petticoat Drove, meaning the existing property at Finger Hill Lodge would need to temporarily utilise Washpit Drove for access. However, Washpit Drove is not proposed to be utilised by construction vehicles and will only temporarily be a diversion route for the Finger Hill Lodge residents when the overhead lines works are being undertaken". The County Council is concerned that Washpit Drove is a Bridleway (South Acre RB1) and therefore more detail on the diversion route is required and the mitigation for users of this route.
- 8.6. In relation to outline Operational Traffic Management Plan (Clean) [[REP1-056](#)], Figure 2.1 Figure 2.1 Access points I (River Road) and H (Fincham Drove) the County Council requests

that clarification be provided as to whether these are a crossing to get to the Western extents of the scheme, or will they provide a primary access point as indicated in T2.1, like A/B/C (i.e. the same comment as is set out above in relation to the outline Construction Traffic Management Plan [\[REP1-052\]](#), Figure 2.1).

- 8.7. In relation to Figure 4.1, while the description states that Route C is not to be used by HGVs, requests that clarification be provided about it is proposed that LGVs will use this route? If so, could anticipated traffic numbers be provided to allow assessment. If all construction traffic is intended to use the main access points on the A1065, it would it is recommended that Route C be removed from the proposals i.e. the same comment as is set out above in relation to the outline Construction Traffic Management Plan [\[REP1-052\]](#), Figure 4.1).
- 8.8. Paragraph 5.6.1 states “Temporary road signage will be installed along the replacement traffic routes to inform all road users of the replacement works and to direct replacement traffic to and from the various replacement accesses. The same comment in relation to Route C (as is set out in paragraphs 9.3 and 9.7 above), applies.
- 8.9. The County Council’s reserves the right to make additional comments in relation to the new and updated traffic and transport related submissions.

9. Water Resources (including Flood Risk)

- 9.1. The County Council has not yet had sufficient time to review the Applicant’s additional submissions on water resources including flood risk. It therefore reserves the right to provide additional comments at a later stage. The County Council is aware that the applicant intends to submit an updated Flood Risk Assessment (“FRA”) and Drainage Strategy at Deadline 2 and requests adequate time to review the updated information.

10. Socio-economics, Recreation and Tourism

- 10.1. It is noted that the Drove Solar Farm’s Deadline 1 submissions, in respect of employment and skills, include no substantive changes and the Council’s position as set out in the Local Impact Report remains unchanged. Norfolk County Council welcomes the inclusion of the Outline Employment and Skills Plan and the requirement for a full Employment, Skills and Supply Chain Strategy (“ESSCS”), approved by Norfolk County Council, prior to commencement. The full Employment and Skills Plan will be produced in consultation with the County Council’s Skills and Employment Team.

11. Health and Wellbeing

- 11.1. The County Council has not yet had sufficient time to review the Applicant’s additional submissions in relation to health and well being. It therefore reserves the right to provide additional comments at a later stage.

12. Arboriculture

- 12.1. The County Council has not yet had sufficient time to review the Applicant's additional submissions in relation to arboriculture. It therefore reserves the right to provide additional comments at a later stage.

13. Minerals and Waste

- 13.1. The County Council has no further comments to make at this stage.

14. Fire and Safety

- 14.1. The County Council notes that there is no updated version of the previously submitted outline Battery Safety Management Plan ("oBSMP") [[APP-194](#)]. Its previous comments set out in its LIR therefore remain valid.