

The Drovers Solar Farm

Applicant's Response to Written Representations and other Deadline 1 Submissions

Prepared by: DWD

Date: June 2026

PINS reference: EN0110013

Document reference: APP/8.13 (Original)

Infrastructure Planning (Examination Procedure) Rules 2010





Contents

<u>1.</u>	<u>Introduction.....</u>	<u>4</u>
1.1.	Purpose of the Document	4
1.2.	Structure and Scope of the Report.....	4
<u>2.</u>	<u>The Applicant's responses to Host and Neighbouring Local Authorities</u>	<u>8</u>
<u>3.</u>	<u>The Applicant's responses to Prescribed Bodies</u>	<u>36</u>
<u>4.</u>	<u>The Applicant's responses to Organisations and Businesses</u>	<u>64</u>
<u>5.</u>	<u>The Applicant's responses to Elected Representatives.....</u>	<u>83</u>
<u>6.</u>	<u>The Applicant's responses to Members of the Public.....</u>	<u>93</u>



1. Introduction

1.1. Purpose of the Document

- 1.1.1. This document has been prepared on behalf of The Drovers Solar Farm Limited (the Applicant) in relation to an application (the DCO Application) for a Development Consent Order (DCO) to be made to the Secretary of State (SoS) to construct, operate and maintain, and decommission The Drovers Solar Farm (the Scheme), pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2. This document provides the Applicant's response to the Written Representations (WRs) submitted to the Examining Authority (the ExA) at Deadline 1 of the Examination of the DCO Application.
- 1.1.3. The Local Impact Reports submitted by the host authorities, being **Breckland Council** [\[REP1-079\]](#) and **Norfolk County Council** [\[REP1-094\]](#), and the neighbouring authority of **Borough Council of King's Lynn and West Norfolk** [\[REP1-076\]](#) have been responded to separately in **Applicant's Response to Local Impact Reports** [\[APP/8.12\]](#).
- 1.1.4. A total of 35 WRs and other documents were submitted at Deadline 1 by Interested Parties. These were published on the PINS website on 5 June 2026.

1.2. Structure and Scope of the Report

- 1.2.1. This document provides a response from the Applicant to the matters raised in the WRs and other documents and is structured as follows:
- **Section 2** presents the WRs submitted by the local authorities and are responded to in full by the Applicant
 - **Section 3** presents the WRs submitted by prescribed bodies and are responded to in full by the Applicant
 - **Section 4** presents the WRs submitted by organisations and businesses and are responded to in full by the Applicant
 - **Section 5** presents the WRs submitted by elected representatives and are responded to in full by the Applicant; and
 - **Section 6** presents the WRs submitted by members of the public and are responded to in full by the Applicant.
- 1.2.2. **Table 1-1** provides a breakdown of the scope of this document and details where a WR or other Deadline 1 submission, if relevant, has been responded to.



Table 1-1: Table of Parties submitting WRs and other Deadline 1 submissions, as organised by the sections of this document

WR or other Deadline 1 submission reference	Responded to in this document?	Reason
Section 2		
Castle Acre Parish Council [REP1-082]	Yes	The Applicant wishes to respond to points made in this submission.
Norfolk County Council [REP1-095]	Yes	The Applicant wishes to respond to points made in this submission.
Sporle with Palgrave Parish Council [REP1-098]	Yes	The Applicant wishes to respond to points made in this submission.
Castle Acre Parish Council [REP1-081]	Yes	The Applicant wishes to respond to points made in this submission.
Castle Acre Parish Council [REP1-083]	Yes	The Applicant wishes to respond to points made in this submission.
Sporle with Palgrave Parish Council [REP1-099]	Yes	The Applicant wishes to respond to points made in this submission.
Swaffham Town Council [REP1-100]	Yes	The Applicant wishes to respond to points made in this submission.
Sporle with Palgrave Parish Council [REP1-097]	No	The submission provides location suggestions to the ExA for a site inspection. The Applicant does not have any comments to make on this submission.
Borough Council of Kings Lynn and West Norfolk [REP1-078]	Yes	The Applicant wishes to respond to points made in this submission.
Borough Council of Kings Lynn and West Norfolk [REP1-077]	Yes	The Applicant wishes to respond to points made in this submission.
Little Dunham Parish Council [REP1-089]	Yes	The Applicant wishes to respond to points made in this submission.



Breckland Council [REP1-080]	Yes	The Applicant wishes to respond to points made in this submission.
Section 3		
Anglian Water Services [REP1-075]	No	The Applicant notes the submission and confirms that there is nothing within it which warrants a direct response. Instead, the Applicant will continue discussions with Anglian Water Services via SoCG with Anglian Water Services Ltd [REP1-025] .
Environment Agency [REP1-087]	Yes	The Applicant wishes to respond to points made in this submission.
National Electricity Transmission plc [REP1-090]	Yes	The Applicant wishes to respond to points made in this submission.
Anglian Water Services [REP1-074]	No	The Applicant notes that this submission provides a clarifying position on behalf of the Interested Party and that this position does not require a response.
National Electricity Transmission plc [REP1-091]	No	The Applicant considers that this submission either duplicates comments previously made in National Grid Electricity Transmission plc [REP1-090] or it does not contain points which require a response.
Natural England [REP1-093]	Yes	The Applicant wishes to respond to points made in this submission.
Historic England [REP1-088]	Yes	The Applicant wishes to respond to points made in this submission.
Natural England [REP1-092]	Yes	The Applicant wishes to respond to points made in this submission.
Environment Agency [REP1-086]	Yes	The Applicant wishes to respond to points made in this submission.
Section 4		
Norfolk Wildlife Trust [REP1-096]	Yes	The Applicant wishes to respond to points made in this submission.



CPRE Norfolk [REP1-085]	Yes	The Applicant wishes to respond to points made in this submission.
Section 5		
George Freeman MP [REP1-102]	Yes	The Applicant wishes to respond to points made in this submission.
James Wild MP [REP1-104]	Yes	The Applicant wishes to respond to points made in this submission.
George Freeman MP [REP1-103]	No	The Applicant considers this submission to replicate the comments made in [REP1-102] and so there is nothing further for the Applicant to respond to in this submission.
Tim Hubbard, Chair of Castle Acre Parish Council [REP1-084]	Yes	The Applicant wishes to respond to points made in this submission.
Section 6		
Sharron Morgan [REP1-107]	Yes	The Applicant wishes to respond to points made in this submission.
Mark Holmes [REP1-105]	Yes	The Applicant wishes to respond to points made in this submission.
Philip Morton [REP1-106]	Yes	The Applicant wishes to respond to points made in this submission.
Gerald Bernard Allen [REP1-108]	Yes	The Applicant wishes to respond to points made in this submission.
Antony Morgan [REP1-101]	Yes	The Applicant wishes to respond to points made in this submission.



2. The Applicant's responses to Host and Neighbouring Local Authorities

Reference	Comments	Applicant's Response
Castle Acre Parish Council - Further question related to ExA written question [REP1-081]		
CAPC1-1	<p>ExQ1. Q1.0.2</p> <p>We have not had any meaningful discussions regarding community benefit. Are we still able, and would it be appropriate to apply for a Statement of Common Ground between local affected Communities and the applicant to cover community benefits ensuring progress on this matter is achieved and is embedded into any agreement?</p> <p>With reference to the Consultation Report [APP-025], Table 22 states: "Throughout the pre-application process, the Applicant has consulted on community benefits and, based on feedback and ongoing discussions, will determine how best to distribute funding." Could the applicant clarify what community benefits are proposed and how these would be secured? This has currently not happened.</p>	<p>The Applicant is committed to establish a community liaison group, who will facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the construction of the Scheme. This is secured through Requirement 4 of Schedule 2 of the draft Development Consent Order (DCO) [APP/3.1.2]. As outlined within the response to Q1.0.2 of Table 1.1: General and cross-topic questions within Applicant's Response to ExQ1 [REP1-069], the Applicant has also committed to providing a Community Benefit Fund. The Community Benefit Fund, which is explained in further detail within the original response, is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). The Applicant therefore does not consider that a Statement of Common Ground would be appropriate in this regard.</p> <p>The Applicant has consulted on a range of topics, including community benefits throughout the pre-application process, as outlined in the Consultation Report. This includes briefings with the Parish Councils in early meetings on 9 September 2024, involvement in in-person early workshops on 17 September 2024 and 1 October 2024, alongside further briefings on 6-8 May 2025. Ongoing dialogue is being arranged and will continue discussions to determine how best to distribute the fund within the community. A local foundation will likely independently determine the local initiatives to provide services to the community that are chosen to benefit from the Community Benefit Fund.</p> <p>As detailed within the original response to Q1.0.2 within Applicant's Response to ExQ1 [REP1-069], the Planning Statement [REP1-012] details other community benefits which will be realised at the local level. For example, permissive paths are proposed through the outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP-192]. This document will be secured in full by Requirement 16 of Schedule 2 of the draft DCO [APP/3.1.2].</p> <p>Other benefits, discussed in further detail in the original response, include those outlined within the Employment, Skills and Supply Chain Strategy (oESSCS) [APP-195]. This document will be secured through Requirement 18 of the draft DCO [APP/3.1.2]. Furthermore, it is now clarified that the benefits previously discussed within the outline Landscape and Ecological Management Plan (oLEMP) [REP1-060] will be secured in detail through Requirement 7 of the draft DCO [APP/3.1.2].</p>
Castle Acre Parish Council - Written Summary of Issue Specific Hearing 1 (ISH1) [REP1-082]		
CAPC2-1	<p>Page 1, Cultural Heritage.</p> <p>The proposed Drovers Solar Farm will have a negative impact on the historic landscape of the Nar Valley and its many centuries of agricultural use.</p> <p>The word acre comes from the Old English for a plot of arable land. Both Castle Acre and South Acre Parishes were well-established by the time of the Norman Conquest, their population, land ownership and productive resources being detailed in the Domesday Book of 1086.</p> <p>What is at risk if The Drovers Solar Farm goes ahead, is the rural settlement pattern of farmsteads alongside nucleated villages; the narrow rural road network, much of which is</p>	<p>The impact upon cultural heritage, including the Nar Valley, is detailed within ES Chapter 8: Cultural Heritage and Archaeology [APP-057].</p> <p>With regard to the meaning of 'acre' and the arable use of the Site, the bulk of the Order limits are unlikely to have been used as arable land in the medieval period but would more likely have formed summer pasture/grazing land. The almost complete lack of medieval artefacts recovered during the trenching (ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160]) suggests that the area was not being intensively manured in the period and was, therefore, unlikely to have formed arable land as it does today. The bulk of the Site is also visually and spatially separated from the heritage assets in the Nar Valley, making little (if any) contribution to their significance.</p>



Reference	Comments	Applicant's Response
	<p>based on medieval trackways and holloways, bounded by banks and ditches; the remnant medieval field boundaries and livestock droeways and the Agricultural Revolution 'improvements' of rectangular fields with marl pits.</p> <p>The area has been called Norfolk's "Holy Land" due to the high concentration of medieval religious sites, six in total and with Castle Acre and West Acre Priors as the most extensive. Also impressive are the ruins of 12th-century Norman castle at Castle Acre with extensive earthworks and surviving masonry and the Grade 1 listed churches of Castle Acre and South Acre, as dominant features in the landscape.</p> <p>All these settings will be adversely impacted by the industrialisation of their encompassing landscapes.</p> <p>In particular, the Roman Road known as the Fen Causeway -Fincham Drove which links Ermine Street to the Peddar's Way and the Norman designed landscape in which the original course of the Peddar's Way was abandoned and a new southern approach to Castle Acre created along the ridge to give the most impressive approach to Castle Acre, displaying the high status sites of Priory, Church and Castle to the best advantage. It was this approach which would be familiar to the visiting kings, Henry III and Edward I.</p>	<p>The Scheme will not result in change to the 'encompassing' landscape, but rather it will represent change to an element of the wider landscape that is separated from the designated heritage assets by retained agricultural land.</p> <p>In terms of the Fen Causeway-Fincham Drove, this historic routeway will be retained within the Scheme. Archaeological works undertaken to inform the DCO Application indicate that the Fen Causeway-Fincham Drove does not extend to the Peddars Way directly across the Site as previously supposed (ES Appendix 8.4: Geophysical Survey Report [APP-154 - APP-158] and ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160]).</p> <p>With regards to the 'Norman designed landscape', there is no firm evidence to demonstrate that the abandonment of Peddars Way and the use of the more western route was a purposeful creation to provide a more impressive approach, nor is there any evidence for the date at which this change took place. Whilst the argument for the 'designed approach' is suggested in Robert Liddiard's 'Landscapes of Lordship' (BAR 2000), it remains only a theory and does not examine any of the more prosaic possibilities for the realignment of the principal approach.</p>
CAPC2-2	<p>Page 2, Cultural Heritage</p> <p>The visual and experiential harm caused by the scale, fencing, and infrastructure of the proposed solar farm would be significant, compromising the cultural landscape of one of Norfolk's most important heritage clusters. The topography of the landscape surrounding Castle Acre, its prominent position above the Nar Valley and consequent changes in elevation provide for a number of stunning views which are not to be found elsewhere in Norfolk.</p> <p>It is the undoubted beauty of its landscape and the richness of Castle Acre's historic and natural environment that sets it apart from many other Norfolk villages. It is therefore a major attraction to visitors but is equally treasured by its residents who value access to the surrounding countryside and the generally underdeveloped rural character of the area and its sense of remoteness and tranquillity.</p> <p>I would therefore ask the examiner to take into consideration the long-term and unjustified harm to an irreplaceable historic environment which contains within it over one thousand years of landscape history and heritage.</p>	<p>The impact upon cultural heritage is detailed within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets due to the lack of shared experience between the plateau land and the heritage assets, which is a prerequisite for contribution to significance. Large tracts of agricultural land lie between the Order limits and the assets, and the understanding and context of these assets will, therefore, remain to be clearly appreciated.</p>
CAPC2-3	<p>Page 2, Conflict with the Castle Acre Neighbourhood Plan 2022</p> <p>The Castle Acre Neighbourhood Plan, developed and adopted by the local community, sets out a clear vision to protect and enhance the village's historic character, its rural landscape setting, and its natural environment.</p> <p>Specifically, the Plan emphasises:</p> <ul style="list-style-type: none"> • Preservation of the unique historic landscape and heritage assets of Castle Acre, including its internationally important Scheduled Monuments and the Conservation Area; • Protection of valued countryside views and rural approaches; • Support for sustainable development that aligns with the community's identity and landscape sensitivity. <p>The Drovers Solar Farm proposal contradicts these aims.</p>	<p>Policy HE.1 'Protecting Historic Assets' of Castle Acre's Neighbourhood Plan emphasises the importance of the area's historic assets and states that proposals with potential to impact the historic environment should be supported by a detailed Heritage Statement. The impact upon cultural heritage is detailed within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] and is thus compliant with the policy. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets due to the lack of shared experience between the plateau land and the heritage assets, which is a prerequisite for contribution to significance. Large tracts of agricultural land lie between the Order limits and the assets, and the understanding and context of these assets will, therefore, remain to be clearly appreciated.</p> <p>Policy NE.1 'Protection of Landscape Setting' of the Castle Acre Neighbourhood Plan focuses on the visual scenic value of the landscape and countryside outside the defined settlement boundary. The impact on the landscape and visual receptors within Castle Acre is discussed at the previous response CAP7 of Table 2.5 of the Applicant's Response to Relevant Representations [REP1-067]. As explained further within that response, no significant landscape effects have been concluded as result of the assessment beyond the Order limits. As outlined within 8.3.177 of the</p>



Reference	Comments	Applicant's Response
	<p>It introduces a large-scale industrial development into the rural setting of Castle Acre, undermining the Plan's objectives to protect heritage, landscape character, and local biodiversity.</p> <p>As such, approval would conflict with a democratically endorsed statutory planning document and erode public confidence in neighbourhood planning.</p>	<p>Planning Statement [REP1-012], given the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and heritage effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.</p>
CAPC2-4	<p>Pages 2 and 3, Impact on Statutory Heritage Assets and Their Setting</p> <p>The proposed solar farm lies within the setting of multiple designated heritage assets, including:</p> <ul style="list-style-type: none"> • Castle Acre Priory (Scheduled Monument) • Castle Acre Castle (Scheduled Monument) • Bailey Gate (Scheduled Monument) • St James the Great Church (Grade 1 listed) • St George Church, South Acre (Grade 1 listed) • The historic route of the Peddars Way (parts of which are a scheduled monument as it was a Roman Road and later used by pilgrims travelling to the medieval shrine at Walsingham. It is now a National Trail). <p>These assets are protected under the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires authorities to preserve their setting.</p> <p>Paragraphs 199–208 of the National Planning Policy Framework stipulate that "great weight" must be given to conserving heritage assets. Any harm to their setting, even if "less than substantial," must be clearly justified and outweighed by public benefit.</p> <p>These heritage assets are of particular importance when regarded together. There is a direct archaeological and historical association between the Castle, the 12th century planned settlement and its defences and the Priory (all founded by the de Warennes) above the Roman crossing point of the River Nar.</p> <p>The Roman Road known as the Fen Causeway- Fincham Drove meets the Peddars Way close to Bartholomew Hills and was a key feature of the landscape before agricultural enclosures, as an essential route for moving livestock (cattle, sheep, geese, and turkeys) to markets or seasonal grazing pastures.</p> <p>The present-day lane from the A1065 to South Acre is actually a key part of the unique Norman designed landscape in which the original course of the Peddar's Way was abandoned and a new southern approach to Castle Acre created along the ridge. This was a deliberate manipulation so that the route from the south gave the most impressive approach to Castle Acre from Great Palgrave to the South Acre Road then via South Acre Ford along Blind Lane to the South Gate and into the planned town, displaying the high status sites of the Priory, Church and Castle to the best advantage. It was this approach which was seen by visiting kings, including Henry III and Edward I.</p> <p>The Priory at Castle Acre, the second Cluniac foundation in England, is one of six religious houses sited along the Nar Valley and these were all visited by pilgrims travelling to the medieval shrine at Walsingham, the second most important religious centre, after Canterbury.</p>	<p>The impact upon cultural heritage is detailed within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets due to the lack of shared experience between the plateau land and the heritage assets, which is a prerequisite for contribution to significance. Large tracts of agricultural land lie between the Order limits and the assets, and the understanding and context of these assets will, therefore, remain to be clearly appreciated.</p> <p>It should be noted that the Peddars Way is not a scheduled monument and is therefore not subject to any statutory protection.</p> <p>The Planning (Listed Buildings and Conservation Areas) Act 1990 does not require authorities to preserve the setting of listed buildings, but rather places a duty on them to have special regard to the desirability of preserving the setting.</p> <p>Archaeological evidence suggests that Fincham Drove (the Fen Causeway) does not extend across the Site to meet Peddars Way (ES Appendix 8.4: Geophysical Survey Report [APP-154 - APP-158] and ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160]).</p> <p>The 'Norman designed landscape' and the route of the southern approach to Castle Acre is entirely theoretical and it is equally possible, if not more likely, that there is a more prosaic reason for the realignment of the approach. The Applicant notes that NPPF Paragraphs 199-201 address air quality, rather than heritage assets. The Applicant has responded to the part of the NPPF which is relevant to the Scheme from a heritage perspective, which is Paragraph 207, at page 170 of the Policy Compliance Document [REP1-014].</p>



Reference	Comments	Applicant's Response
	<p>A 12th century leper hospital stood on Bartholomew's Hills. Even the name is a significant survival, as Bartholomew was the patron saint of lepers.</p> <p>The setting of these historic buildings and sites is a major part of their significance and of our appreciation of them. The proposed Drovers Solar Farm will deprive them of their context within the wider historic environment and landscape.</p>	
CAPC2-5	<p>Page 3, Threat to Archaeological Significance</p> <p>Castle Acre lies in an area of high archaeological potential, with documented features from Roman, Saxon, and medieval periods.</p> <p>Development of this magnitude risks destroying unrecorded archaeological remains.</p> <p>It also takes away any opportunity to discover more about this historic landscape for sixty years, as any archaeological investigations will be impossible on land covered by solar panels.</p>	<p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been devised in consultation with NCC to ensure that appropriate archaeological mitigation is in place prior to construction of the Scheme.</p>
CAPC2-6	<p>Page 3, The Natural Environment, Impact on Soils and Geology</p> <p>The geology of the Nar Valley is characterized by a succession of glacial, interglacial, and modern deposits including sandy and gravelly deposits, rich in flint and chalk pebbles, laid down as the glacial valleys were infilled after the ice retreated.</p> <p><i>One site in particular is of special significance – Bartholomew Hills.</i> The site is composed largely of glacial sand and gravel deposits from the Quaternary Ice Ages, about 430,000 years ago.</p> <p>Bartholomew Hills is proposed as a site for the sub-station which will destroy the significant geological features, the most prominent of which is the accumulation of Quaternary-age sands and gravels associated with the ancient "Kesgrave-type Sands and Gravels," laid down by a pre-Anglian river system (similar to the modern Thames), and subsequent glacial outwash during various Ice Ages.</p> <p>The Palaeolithic material from this site is of particular significance due to the presence of crude cores and thick flakes alongside cores and flakes that display evidence for Levallois techniques. A number of handaxes and flakes with secondary working have also been recovered</p>	<p>The potential for the presence of palaeolithic remains has been discussed with Norfolk Historic Environment Service and ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] provides for geoarchaeological assessment and subsequent mitigation (if required) once details of potential impacts upon these deposits is known.</p>
CAPC2-7	<p>Page 4, Impact on the River Nar SSSI and Local Nature Recovery Goals</p> <p>The site lies within the catchment of the River Nar, a protected chalk stream designated as a Site of Special Scientific Interest (SSSI) supporting a range of important Biodiversity Action Plan habitats, including chalk stream areas, fens, wet meadows and woodlands.</p> <p>One of only about two hundred and twenty chalk streams in the world and described by the Norfolk Rivers Trust as 'arguably Norfolk's most unspoilt and beautiful example' the Nar supports an outstanding assemblage of dragonflies as well as the Biodiversity Action Plan mollusc species, Desmoulin's whorl snail, listed as 'endangered'.</p> <p>As a large-scale solar farm on currently agricultural land, it risks displacing birds from their natural habitats and is particularly detrimental to ground-nesting birds and species that rely on open fields for foraging such as lapwing, skylark, yellowhammer, corn bunting and turtle dove, all species that are on the Birds of Conservation Concern Red List.</p> <p>Under NPPF Paragraphs 180–182, any development with potential to harm SSSIs or irreplaceable habitats must be avoided or rigorously mitigated.</p>	<p>Embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse, are secured through the outline Construction Environmental Management Plan (oCEMP) [APP/7.6.2], and full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in Section 7.7 and 7.8 of ES Chapter 7: Ecology and Biodiversity [REP1-034], which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant (in EIA terms) effects.</p> <p>To ensure that sensitive ecological receptors are protected through the construction of the Scheme, measures to be adhered to are set out within the oCEMP [APP/7.6.2]. These include, but are not limited to, measures to control noise, light, and pollution. In addition, a Ground Nesting Bird Strategy has been prepared to fully mitigate potential impacts on these species (see ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]).</p> <p>Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [REP1-034], including with specific reference to international, national and locally designated sites of ecological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity,</p>



Reference	Comments	Applicant's Response
	<p>The proposal risks habitat fragmentation, biodiversity loss, and increased surface runoff — all of which are contrary to the Environment Act 2021 and emerging Local Nature Recovery Strategies.</p>	<p>including irreplaceable habitats (as included within NPPF Section 15 Paragraphs 187-193). ES Chapter 7: Ecology and Biodiversity [REP1-034], concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, no adverse likely significant effects are anticipated on any receptors, and as such is in line with NPPF Section 15 Paragraphs 187-193. Accordingly, the assessment confirms that following the implementation of the mitigation measures set out, connectivity between habitats will be strengthened and enhanced, such that the Scheme will not result in habitat fragmentation. Further, the Biodiversity Net Gain Assessment Report [REP1-048] confirms (on the basis of the government's metric) that the Scheme will result in significant biodiversity gains and therefore would not result in biodiversity loss. Accordingly, it is clear that the Scheme would not be contrary to the Environment Act 2021 or the Local Nature Recovery Strategy in this regard.</p> <p>The Applicant notes that NPPF Paragraphs 180-182 relate to flood risk and drainage. However, potential harm to SSSIs or irreplaceable habitats is covered under Paragraph 193, which the Applicant has addressed on page 168 of the Policy Compliance Document [REP1-014].</p>
CAPC2-8	<p>Page 4, Impact on food production and food security</p> <p>Farming in the locality contributes greatly to the rural feel of Castle Acre, providing green views away from the village with a large regular field pattern broken up by belts and copses of mixed and coniferous woodland and plantations whilst also providing employment and income to the area.</p> <p>The proposed site includes land likely classified as Grades 2 and 3a, which fall under the government's definition of Best and Most Versatile (BMV) agricultural land — the highest quality for food production. Under NPPF Paragraphs 174 and 180, the loss of such land should be avoided unless absolutely necessary.</p> <p>No details have been presented as to how the land will be returned successfully to agriculture nor to the cost to do so.</p> <p>In fact, it is highly unlikely that the land could return to agriculture in 60 years' time because of soil contamination from chemical leaching; the bases of the posts left in the ground; the intrusive infrastructure; the lack of new-generation farmers and especially tenant farmers.</p> <p>Removing this land from agricultural use for decades undermines sustainability goals and conflicts with the Castle Acre Neighbourhood Plan, which supports continued agricultural use and rural character.</p> <p>The development would set a concerning precedent for future loss of the 'best and most versatile' (BMV) land in Norfolk.</p> <p>The reduction in our home food production capacity should be of concern to us all. If we lose farms and farming, we risk damage to the local infrastructure and to tourism but above all, we will destroy the stewardship of the land which has supported rural communities across the UK for centuries.</p>	<p>It is noted that the Castle Acre Neighbourhood Plan seeks to protect the farmland character of the area. As outlined in further detail within response to CAP7 within Table 2.5 of Applicant's Response to Relevant Representations [REP1-067], potential impacts on landscape character, including within Castle Acre, have been fully assessed within ES Chapter 6: Landscape and Visual [AS-016]. The assessment concludes that there are no long term significant adverse landscape effects upon the relevant Landscape Character Area (LCA). As outlined within the response CAPC2-3 above, given the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.</p> <p>The decommissioning phase is described in ES Chapter 11: Soils and Agriculture [AS-018] at section 11.8.115 onwards. This describes how the solar PV modules will be removed fully from the land, following unbolting and removal of the panels and framework. It describes how cables will be removed and land reinstated (which is a short-term temporary operation similar to construction), and how tracks and infrastructure will be restored to the same ALC grade as currently exists.</p> <p>There will be no bases left in the ground, nor will panels have leached chemicals that would affect agricultural use during the operational phase or following decommissioning. The cost of removing the solar panels and infrastructure will be covered by the Applicant. Thereafter, continued agricultural use, for grassland or arable enterprises, will be possible.</p> <p>Further details are set out in the outline Decommissioning Strategy (oDS) [REP1-058].</p> <p>There is no specific policy with regards to the protection of agricultural land use within Castle Acre Neighbourhood Plan. Nevertheless, it is considered that the Scheme has fully considered its impact with regards to this matter.</p> <p>As previously outlined in the response to CAPC25 within Table 2.5 of Applicant's Response to Relevant Representations [REP1-067], agricultural land quality was a key consideration in the Applicant's site selection process. Furthermore, the amount of land by ALC grade that is affected by temporary or permanent disturbance is summarised in Table 11-7 of ES Chapter 11: Soils and Agriculture [AS-018], and amounts to 38ha of BMV. The majority of this, except for 4.5ha for the National Grid Substation and Grid Connection Infrastructure, will be restored to comparable grade on decommissioning.</p> <p>In addition, the Policy Compliance Document [REP1-014] demonstrates the Scheme's compliance with the NPPF and the relevant NPS policy tests on the use of best and most versatile agricultural land, rather than setting any precedent.</p>



Reference	Comments	Applicant's Response
		<p>The Applicant has provided an oDS [REP1-058], the detailed version of which would set out the plan for decommissioning based on more up to date information at the time. Paragraph 2.1.2 of the oDS [REP1-058] notes that the foundations and other below ground infrastructure will be dug and buried respectively to 1.2m below the surface to enable future ploughing, and any piles would also be removed.</p> <p>ES Chapter 11: Soils and Agriculture [AS-018] concludes overall that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production.</p>
CAPC2-9	<p>Page 5, Impact on Castle Acre's Dark Skies Policy</p> <p>From the national dark skies/light pollution maps produced by the Countryside Charity (formerly the Campaign for Rural England CPRE), Castle Acre falls into Category 3 (of a scale of 9, with 9 being the most polluted).</p> <p>The surrounding area, with less habitation, falls into Category 2 –and from the maps is <i>clearly visible as a darkened landscape. It is this very area which is the site of the proposed solar farm.</i></p> <p>The effects of the security lighting:</p> <ul style="list-style-type: none"> • Sky glow is a product of light being scattered by water droplets or particles in the air. • Light trespass occurring when artificial light illuminates an area that would otherwise be dark. • Glare is created by light that shines horizontally. • The effect on wildlife • The effect on human health and wellbeing. <p>The adoption by Castle Acre Parish Council of a Dark Sky Policy based on the NPPF's Framework Clause 180c and Norfolk County Council's Environmental Lighting Zones Policy, the impact of operational and security lighting from the proposed solar farm is an additional concern, adversely affecting the quality of our night skies and their value to nocturnal wildlife.</p>	<p>Regarding operational lighting, the Scheme would not conflict with NPPF paragraph 198 (c) or the Dark Sky Policy in Castle Acre's Neighbourhood Plan (adopted 2022) – Policy NE.4 Dark Skies. The Scheme limits light spillage and eliminates all unnecessary forms of artificial outdoor lighting, as secured in the outline Operational Environmental Management Plan (oOEMP) [APP/7.8.2].</p> <p>The Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion sensing lighting and be used only for security and maintenance purposes as secured in oOEMP [APP/7.8.2] and explained in ES Chapter 5: The Scheme [REP1-032]. Lighting is not required within the Solar PV Site during the operation phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. Temporary Site lighting would be used during construction to enable safe working during construction in hours of darkness or where natural lighting is unable to reach (such as sheltered/confined areas). Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the construction compounds while construction is underway.</p> <p>The Design Principles, Parameters and Commitments [APP/5.8.2] confirms that <i>"The Solar arrays will not be lit during the operational phase"</i>, such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the Site, whilst measures to control lighting and prevent adverse effects draft DCO [APP/3.1.2] are set out within the oCEMP [APP/7.6.2] and secured via Requirement 13 of Schedule 2 of the draft DCO [APP/3.1.2].</p>
CAPC2-10	<p>Page 5, Impact of Noise Pollution</p> <p>Though solar panels themselves do not emit noise, the infrastructure surrounding the solar farm will create residual noise, particularly from the sub-station, the battery storage, inverters and fans.</p> <p>With a large-scale solar farm such as The Drovers, up to 100 inverters will be required which will produce a sound pressure level of 74db per inverter as a persistent hum. In hot weather, inverters can overheat so noisy fans might be needed.</p> <p>In this rural and tranquil landscape, such additional noise will be intrusive, affecting the quality of life of residents and all those using the Public Rights of Way and footpaths on or near the solar installations as well as being damaging to local wildlife.</p> <p>With a two -year construction timescale, the noise generated by piling for the panel supports, the installation of associated infrastructure and from construction traffic on local roads is another reason for objecting to the proposed solar farm.</p>	<p>The Applicant acknowledges concerns regarding the potential noise effects from the Scheme. ES Chapter 10: Noise and Vibration[APP-059] presents a comprehensive assessment of noise effects from the construction, operation and decommissioning phases of the Scheme. Although there are many inverters and noise emitting plant, due to the large scale of the Scheme the equipment has been strategically positioned to increase separation distance to noise-sensitive receptors as far as reasonably practicable, such that receptors will not hear all the inverters operating together and the noise levels will be controlled to within stringent criteria. Cooling fan noise and acoustic characteristics such as 'hum' or 'tone' have also been accounted for as rating penalty corrections in the assessment.</p> <p>The assessment also considers the tranquil context of the area and has been assessed to existing background and low absolute levels. The assessment shows residual noise effects to be not significant at noise-sensitive receptors such as residents and PROW.</p> <p>The construction assessment has been undertaken on a conservative basis, showing construction activity, such as piling, taking place at the closest point to receptors, as such the effects presented</p>



Reference	Comments	Applicant's Response
		<p>are worst-case and for most of the duration of the construction phase the observed effects will be lower than those presented in the assessment as the construction activity moves further away from receptors. These worst-case effects, including construction traffic noise at the highest predicted traffic month of the programme, were determined to be not significant. Mitigation measures to control construction noise to non-significant effects have been set out in the oCEMP [APP/7.6.2] which will be implemented in the detailed Construction Environmental Management Plan and secured through a DCO requirement.</p>
CAPC2-11	<p>Pages 5 and 6, Impact on the local economy and tourism, including the issues related to construction traffic and materials' transportation</p> <p>Castle Acre's position as an important tourist attraction supports hospitality and accommodation businesses which bring value and employment to the village.</p> <p>The industrialisation of the environment, undermining the area's aesthetic value, will reduce its attractiveness to tourists and potentially harming the local tourism economy.</p> <p>The World Health Organization recommends solar farms be at least 2 km (1.2 miles) from residential areas protecting wellbeing, yet this development will sit just a short distance from parts of South Acre, with parts of Castle Acre and Swaffham also within this health guideline zone.</p>	<p>The Applicant acknowledges concerns regarding the potential effects of the Scheme on local tourism. The assessment of effects on local tourism assets in ES Chapter 14: Socio-Economics [APP-063] finds that, while some localised adverse effects on visual amenity and recreational experience may occur, particularly at assets such as Castle Acre Priory and Castle, and along certain PRoWs, these effects are limited in extent and not significant in EIA terms, and would reduce over time through mitigation (including landscape screening and enhancements secured through the oLEMP [REP1-060]. The Applicant notes that local businesses may rely on tourism-related spending. While the assessment in ES Chapter 14: Socio-Economics [APP-063] focuses on the effects on tourism assets, it found no significant effects on those assets in EIA terms. As such, it is reasonable to conclude that there would be no material change in overall visits or tourism activity, and therefore no adverse effect on the revenue of businesses that depend on tourist trade. While effects associated with construction worker expenditure were scoped out of the assessment, it is noted that there may be some limited, short-term increase in local spending during the construction phase.</p> <p>The World Health Organization (WHO) has reviewed the available scientific evidence on this issue and acknowledges that a range of symptoms have been reported.¹ However, it concludes that "to date, scientific evidence does not support a link between these symptoms [headaches, anxiety, suicide and depression, nausea, fatigue and loss of libido] and exposure to electromagnetic fields. At least some of these health problems may be caused by noise or other environmental factors, or by anxiety related to the presence of new technologies". The evidence reviewed by the WHO does not identify any specific distance at which health effects occur, with conclusions based instead on measured exposure levels.</p>
CAPC2-12	<p>Page 6, Impact on the Quality of the Landscape and Views</p> <p>The proposed Drovers Solar Farm would introduce visually intrusive infrastructure into an open, rural landscape that contributes to the village's identity and attracts visitors.</p> <p>Peddars Way and Nar Valley Way users, residents, and tourists would experience industrialisation of a previously tranquil and historic setting.</p> <p>This conflicts with NPPF Paragraphs 187 and 204 and Local Plan policies that seek to safeguard the intrinsic character and beauty of the countryside.</p> <p>Continuous rows of glass panels will completely alter the landscape character which is currently rural and tranquil.</p> <p>The overhead utility cables and new pylons will be new intrusive features.</p> <p>Not only the solar panels themselves but the security fences; CCTV cameras; inverters; access tracks and substations will cumulatively destroy the rural landscape for ever.</p>	<p>ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. This assessment considers all elements of the Scheme detailed in ES Chapter 5: The Scheme [REP1-032], such as Solar PV Arrays, BESS, Customer and National Grid Substations and Grid Connection Infrastructure.</p> <p>The ES Chapter 6: Landscape and Visual [AS-016] considers visual receptors along PRoW, roads and within residential dwellings. Peddars Way and The Nar Valley Way are included within the scope of the LVIA. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects only upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant (in EIA terms) adverse landscape effects beyond the Order limits.</p> <p>In relation to NPPF paragraph 187, the "intrinsic character and beauty of the countryside" also referred to in Breckland Local Plan (Adopted September 2023) Policy ENV05 was recognised in ES Chapter 6: Landscape and Visual [AS-016], ES Appendix 6.1 Consultation and Legislation,</p>

¹ WHO, 2016. Radiation: Electromagnetic fields



Reference	Comments	Applicant's Response
		<p>Planning Policy and Guidance [APP-139], ES Appendix 6.5 Evaluation of Landscape Value [APP-143] and ES Appendix 6.6: Extracts from Relevant Landscape Character Assessments [APP-144].</p> <p>With regard to NPPF paragraph 204, this refers to the designation of conservation areas. The Site is not situated within a conservation area. The Site is adjacent to South Acre Conservation Area. VRG3: Nar Valley Southern Slope and Settlement Edge of South Acre is partially situated within South Acre Conservation Area, of which the assessment concludes there would be potentially adverse moderate visual effects in the long term, which are judged to be not significant.</p> <p>The Solar PV Arrays are not glass. The materiality and elements of the Scheme, including Solar PV Arrays, are detailed within ES Chapter 5: The Scheme [REP1-032].</p>
CAPC2-13	<p>Page 6, Impact on the Important Views</p> <p>The topography of the landscape surrounding Castle Acre, its prominent position above the Nar Valley and consequent changes in elevation provide for a number of stunning views which are not to be found elsewhere in Norfolk.</p> <p>These include long views towards the village itself from all directions and from the village looking out to the wider landscape and the designated historic assets. The significant views are as follows:</p> <ul style="list-style-type: none"> • From the Castle - its elevated position means that the Castle has commanding views over the Nar Valley. • St James Church stands within a walled churchyard, and the view opens out over the grounds of the Priory to the opposite valley side. • St George's Church, South Acre whose site on a quiet lane is backed by fields and woodland. • Bailey Street is characterised by its steep downward gradient winding gently southwards from the Bailey Gate towards the open pastures in the south and the softer landscape of trees and hedges on the opposite valley side. • Views into the village from the north and northwest characterise the traditional rural village in harmony with the rural landscape. • Views from the south, especially from the A1065 north of Swaffham. <p>The natural topography of the area and the river valley providing the rationale for the positioning of the Castle and the Priory and the relationship between the historic and natural landscapes has been interlinked ever since.</p>	<p>ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. The terminology 'Significant Views' is not defined within the methodology for the assessment. The LVIA considers visual receptors along PRoW, roads and within residential dwellings, including all those listed in the comment:</p> <ul style="list-style-type: none"> • Castle Acre Castle (VP14) • St James Church (illustrative view C) • St George's Church (outside of ZVI and edge of VRG 3) • The A1065 (VP1) • Bailey Street (illustrative view a); and • Views from the north of Castle Acre (VP 16). <p>All viewpoints and Visual Receptor Groups (VRG's) are shown on ES Figure 6.7: Visual Receptor Groups [APP-084].</p> <p>The assessment concludes that there would be no potential long term significant (in EIA terms) adverse visual effects upon visual receptors within the Site and wider LVIA study area.</p> <p>The topography of the Site and wider study area is shown on ES Figure 6.3: Landform [APP-080] and described in ES Chapter 6: Landscape and Visual [AS-016].</p>
CAPC2-14	<p>Page 7, The Cumulative Impact</p> <p>With between 7000 and 9000 hectares of potential solar developments proposed across Norfolk, the cumulative impact on landscape character, biodiversity, and heritage must be assessed at a strategic level, taking into account the legal requirements to:</p> <ul style="list-style-type: none"> • protect designated and non-designated heritage assets and their setting; • conserve ecological networks and sensitive habitats; • avoid inappropriate development in open countryside and rural landscapes. 	<p>The Applicant is aware of other projects in the region. Each of the ES Topic Chapters and ES Chapter 18: Summary of Effects [APP-067] consider the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES.</p> <p>ES Chapter 2: EIA Process and Methodology [APP-051] sets out the methodology for considering cumulative schemes in the EIA, which aligns with the PINS Advice on Cumulative Effects Assessment (September 2024). The Applicant notes that High Grove and East Pye are listed within the short list of cumulative developments as set out in ES Appendix 2.4: Cumulative Schemes [APP-136]. The Applicant acknowledges that there are cumulative impacts from the Scheme and that these are set out in each of the ES Topic Chapter, including ES Chapter 8:</p>



Reference	Comments	Applicant's Response
	<p>Given that three major solar farms are planned in the local area—High Grove, East Pye, and The Drovers—covering a total of 3,849 hectares of arable farmland, there are concerns that the cumulative impact of these developments could be catastrophic for local agriculture, landscape, tourism, wildlife, and the community.</p> <p>The visual intrusion of these large-scale solar farms will dramatically alter the character of Norfolk's countryside, diminishing its natural beauty and appeal and destroying its aesthetic and environmental integrity for future generations.</p>	<p>Cultural Heritage and Archaeology [APP-057], ES Chapter 7: Ecology and Biodiversity [REP1-034], and ES Chapter 6: Landscape and Visual [AS-016], and are summarised in ES Chapter 18: Summary of Effects [APP-067]. The Scheme adopts the mitigation hierarchy to minimise cumulative impacts as far as reasonably practicable. Through site evaluation and iterative design, sensitive environmental receptors are avoided as much as possible, reducing the potential for in-combination effects with other developments. This approach is reinforced by embedding mitigation directly into the Scheme, including the strategic positioning of infrastructure away from receptors, the layouts being informed to limit the use of Grades 1 & 2 agricultural land and the incorporation of buffers and green infrastructure.</p> <p>The Statement of Need [APP-042] explains that the proposed location is appropriate for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in timeframes compatible with the government's aims, coupled with sufficient solar irradiance, and a suitable area of secured land for the proposed solar and BESS.</p>
CAPC2-15	<p>Page 7, Conclusion</p> <p>It may be convenient for the developer that the proposed hectares are in single ownership, but it is not convenient for those who live and visit, appreciating the beauty, heritage, wildlife and tranquillity of the unique Nar Valley.</p> <p>The Drovers would introduce a large-scale industrial development into this rural setting and is incompatible with Castle Acre's heritage status, ecological importance, and community-led planning objectives.</p> <p>It represents a form of unsustainable development that would cause long-term and unjustified harm to an irreplaceable historic and natural environment</p>	<p>A comprehensive site selection process took place before arriving at the Scheme, which took into account of relevant policies and criteria set out in NPS EN-1 and EN-3. As outlined in the Design Approach Document [AS-009 - AS-011], throughout the design process, the Applicant adopted an interdisciplinary approach to design, considering both the opportunities and constraints of the Scheme. This included analysis of the existing physical, environmental, social and cultural context of the Site by a broad range of technical disciplines (including landscape and visual, noise, ecology and heritage). Paragraph 9.4.18 of the Planning Balance section of the Planning Statement [REP1-012] concludes that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be consented. Further, the substantial benefits of the Scheme clearly outweigh the residual harms that would arise, including the Scheme's contribution to meeting Government targets on Clean Power by 2030 and Net Zero by 2050, together with more localised beneficial effects that are anticipated during the construction, operational and decommissioning phases of the Scheme, such as beneficial effects to ecology and biodiversity, jobs and permissive paths.</p>
CAPC2-16	<p>Pages 7, Questions</p> <p>1. In this unique cultural landscape, how will the setting of the listed churches; the Castle Acre Conservation Area; the scheduled monuments and the historic landscape features be protected ?</p>	<p>The landscape strategy for the Scheme includes the gapping up and reinforcing of historic hedgerows and use of planting to provide screening from heritage assets, as shown in the Appendix 1: Green Infrastructure Plan of the oLEMP [REP1-060].</p> <p>Positioning of the Customer Substation, National Grid Substation, and BESS to the south of Bartholomew's Hill Plantation, the removal of Field 35 from built development and the setting back of Solar PV Arrays from the northern part of Field 33, will reduce/remove impact on heritage assets to the north (particularly Castle Acre Castle and Castle Acre Priory, from which there are views encompassing the area to the north of Bartholomew's Hill Plantation) as shown in ES Figure 5.2: Construction Masterplan [REP1-043].</p> <p>Removal of Field 35 from any built development and setting back of Solar PV Arrays from northern half of Field 33, as shown in ES Figure 5.2: Construction Masterplan [REP1-043] mitigates potential setting impacts on heritage assets to the north of the Site.</p>
CAPC2-17	<p>Pages 7, Questions</p> <p>2. How will the existing public rights of way retain the open views which are a visual amenity and asset ?</p>	<p>Alongside PRoW, the proposed maintenance and management of hedgerow heights at 3m serves to not only screen views towards the Scheme from PRoW within the Site but also reinforces the existing character of the landscape within the Site and host landscape character area.</p>



Reference	Comments	Applicant's Response
		<p>Many of the PRoW are lined with hedgerow, trees, scrub and woodland blocks; the mitigation planting proposals use these same planting typologies to ensure the mitigation is in-keeping with the local landscape and therefore restores and reinforces the landscape character of the Site.</p> <p>This strategy serves to re-establish their historic character with established hedgerow and trees aligning them. The mitigation planting also serves to screen views towards the Scheme, limiting potentially significant visual effects in the long term and generally leading to a restoration and re-establishment of the landscape fabric that once aligned these routes.</p> <p>With regard to 'open views', these exist from some locations such as those from PRoW South Acre RB7, looking across the Nar Valley northwards, and are retained as part of the Scheme.</p>
CAPC2-18	<p>Pages 7, Questions</p> <p>3. How will public access and recreational enjoyment be restricted during any construction period and be affected during the sixty year lifespan, including when the solar panels require maintenance and / or replacement ?</p>	<p>ES Appendix 6.8: Amenity and Recreation Assessment [APP-146] considers changes to the experience people have when using recreational resources due to perceptual or actual changes to views, noise, air quality or traffic movements in construction, operation and decommissioning.</p> <p>No permanent closures of PRoW within the Site are proposed.</p> <p>Physical effects (e.g. the extinguishment or permanent diversion of PRoW) to the Amenity and Recreational (A&R) resource will not occur as no extinguishment or permanent diversions are proposed. Temporary closures or diversions may be required for a very limited time period during construction to establish internal access tracks within the Order limits where they cross PRoW, but will be limited in extent and duration (it is likely to take just a few days to construct an access track across an existing PRoW). Based on the indicative layouts assessed as part of ES Chapter 6: Landscape and Visual [AS-016], a total of 5 crossing points (associated with access to Fields 27, 30, 31, 34, 16, 9, 12, 13, 11 and 14) for internal access tracks across existing PRoW are needed. These diversions will be managed in accordance with the measures set out in the oCEMP [APP/7.6.2] and oDS [REP1-058], such as providing clear signage to recreational users and banksmen to manage plant movements and crossing where appropriate.</p> <p>The management of PRoW and Permissive Paths during the operational phase of the Scheme is detailed in section 1.5 of the oPRoWPPMP [APP-192].</p>
CAPC2-19	<p>Pages 7, Questions</p> <p>4. When topsoil and subsoil are removed from the site, what measures will be taken to assess and protect buried archaeology, including individual finds ?</p>	<p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been devised in consultation with NCC to ensure that appropriate archaeological mitigation is in place prior to construction of the Scheme.</p>
CAPC2-20	<p>Pages 7, Questions</p> <p>5. What consideration has been given to other sources of green energy such as wind turbines which will have less impact on the landscape ?</p>	<p>The Applicant has responded to this issue on page 8 of the Written Summary of Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071]. Firstly, the Applicant is a solar developer and therefore is proposing a solar Scheme. Onshore wind was not a viable alternative at this location at the time of the development process due to the moratorium for onshore wind in the UK which was only lifted in 2025. Furthermore, the Statement of Need [APP-042] sets out that an onshore wind development at the Site would not be likely to deliver greater benefits or have fewer adverse impacts than the proposed solar Scheme.</p>
CAPC2-21	<p>Pages 7, Questions</p> <p>6. How can a decision be made when there are 'unknowns' such as the site of the sub station and the connection to the National Grid ?</p>	<p>The Applicant refers to its Response to Section 89(3) Letter dated 17 March 2026 [AS-063] and the Written Summary of the Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071] (specifically Agenda Item 3.2) for a full response on this matter.</p> <p>In summary, 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 NGET Substation in another location, then consent can be</p>



Reference	Comments	Applicant's Response
		<p>obtained for the connection works separately. The Applicant is not aware of any reasons as to why this National Grid Substation should be refused as associated development to the Scheme.</p> <p>Further, the Applicant notes that any powers of compulsory acquisition can only be exercised for the purpose for which they are originally sought. Therefore, if NGET decides to locate the National Grid 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 that land.</p> <p>It is an established principle that an applicant is not required to deliver a connection to a generating station as part of a DCO application for that generating station, provided that a connection agreement is in place. In other words, it is not a barrier to granting consent for a generating station if the point of connection is not yet identified or consented.</p> <p>The Applicant has a grid connection offer for the Scheme requiring it to secure consent and land for the point of connection. 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. Consent for the potential National Grid Substation in this location should therefore be fully examined, and NGET will then have the option to carry out the works should NGET determine that the proposed site for the National Grid Substation is suitable (which the Applicant expects to happen, given that the Applicant's site selection methodology is akin to NGET's site selection process). However, 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 (with updated environmental information and assessment) for the connection to the National Grid Substation as a result.</p> <p>The Applicant therefore respectfully disagrees that there is uncertainty surrounding grid connection for the Scheme and has provided clarity on this matter in the documents referenced above. The Applicant has also addressed this point in further detail in response to NGET8 of this document.</p>
CAPC2-22	<p>Pages 7, Questions</p> <p>7. What consideration has been given to the cumulative impact on Norfolk of the existing and proposed energy infrastructure in the county as a whole ?</p>	<p>Cumulative impacts on Norfolk as the study area have been considered with regard to the loss of agricultural land in ES Chapter 11: Soils and Agriculture [AS-018]. The study areas for the other topics assessed in the ES are smaller than the county of Norfolk, therefore cumulative effects assessments have not been carried out at this scale. This approach is in accordance with the PINS Advice on Cumulative Effects Assessment (September 2024), with the full methodology detailed in ES Chapter 2: EIA Process and Methodology [APP-051].</p> <p>Consideration of the cumulative impact on Norfolk has been considered further within the Report on Interrelationships between Projects [REP1-066] was submitted at Deadline 1, and focuses on the inter-relationship particularly between the Scheme and High Grove Solar Farm because it was considered that the inter-relationships with other NSIPs within Norfolk would be limited. It will continue to be updated at subsequent deadlines as necessary.</p>
CAPC2-23	<p>Page 8, Questions</p> <p>8. Would there be monitoring of the construction phase and maintenance by an independent evaluator ?</p>	<p>The Applicant confirms that the construction phase would be monitored to ensure that this adheres to the measures set out within section 7 of the oCEMP [APP/7.6.2]. At this stage, this monitoring is envisaged to be carried out by the appointed contractor in liaison with the Applicant.</p>
CAPC2-24	<p>Page 8, Questions</p> <p>9. Would the results of the monitoring be in 'the public domain' in the interests of transparent accountability ?</p>	<p>The Applicant notes that section 7 of the oCEMP [APP/7.6.2] sets out the monitoring and reporting requirements during the construction phase. In relation to accountability, the detailed Construction Environmental Management Plan must be submitted to, and approved by, the relevant planning authority (in accordance with Requirement 13 of Schedule 2 of the draft DCO [APP/3.1.2]).</p>
<p style="text-align: center;">Castle Acre Parish Council [REP1-083] -Written Representation and further question related to Exa written questions</p>		



Reference	Comments	Applicant's Response
CAPC3-1	<p>Page 1, response to agenda item 3.5 and 3.6</p> <p>We continue to strongly object to the proposed site for this Solar Farm, offering the many reasons we have already stated in our original representations, it is just 'the wrong site' for such an industrial development which cannot be justified. In addition, surely the lack of a confirmed grid connection point and substation location represents a fundamental deficiency in the application which makes it premature.</p> <p>Without clarity as to where and how the development will connect to the transmission network, how can it be possible to:</p> <ul style="list-style-type: none"> • accurately assess environmental effects; • justify compulsory acquisition; or • conclude that the development is indeed deliverable. <p>Surely this uncertainty weighs significantly against the grant of development consent and provides a further and independent basis upon which the application should be refused.</p>	<p>The Applicant notes this concern and refers to its full response to CAPC2-21 above on this matter.</p> <p>The Applicant has also addressed this point in further detail in response to NGET8 of this document.</p>
CAPC3-2	<p>Page 2, paragraph 2</p> <p>[Summary of email exchange between CAPC and the Applicant, noting the following unanswered questions]</p> <p>Are we agreed the communities affected are Swaffham, Castle Acre, South Acre, West Acre, Sporle, Palgrave, Narford?</p> <p>What level of funding might they be thinking of for the affected communities?</p> <p>Are you thinking funding over 10, 20, 30, 40, 50, 60 years?</p> <p>Are you happy to give any funds directly to the communities or via a third-party charitable trust?</p> <p>What type of projects are IGP interested in being associated with as part of this funding?</p> <p>May I suggest a meeting in addition to the PI process to gain an outline of a Community Funding model that would work for all parties.</p>	<p>The Applicant agrees that the Scheme could affect, in varying degrees, the communities within the settlements referred to in the representation.</p> <p>As responded to in the Applicant's Response to ExQ1 [REP1-069], the Applicant is committed to ensuring that communities benefit from the Scheme. As set out in the Planning Statement [REP1-012], the Applicant has committed to providing a Community Benefit Fund. This is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). The Applicant will ensure that all stakeholders are made aware of the Community Benefit Fund in place and will have the opportunity to input where appropriate. The Applicant also notes that a local foundation will likely independently determine the local initiatives to provide services to the community that are chosen to benefit from the Community Benefit Fund. The Community Benefit Fund would be calculated based on the Scheme's generating capacity (MW per year) for the operating life of the Scheme which could be up to 60 years, and delivered in line with industry standards for renewable energy projects. Separately from the Community Benefit Fund, the Planning Statement [REP1-012] confirms that community benefits would be realised at a local level, should consent be granted for the Scheme. For example, the oPRoWPPMP [APP-192] establishes how permissive paths proposed as part of the Scheme will be designed and implemented to improve accessibility across the Site. Further, efforts to provide specific benefits in locally impacted communities are set out in the oESSCS [APP-195] (for employment and economy, including proposals to promote local apprenticeships and training schemes, with the aim of enhancing local skills and qualification rates) and in the oLEMP [REP1-060] (for landscape and ecological improvements).</p> <p>The Applicant is happy to meet with the various parish councils to update on the Community Benefit Funding.</p>
CAPC3-3	<p>Page 2 (ExQ1. Q1.0.2)</p> <p>This has currently not happened; we have not had any meaningful discussions regarding community benefit. Are we still able, and would it be appropriate to apply for a Statement of Common Ground between local affected Communities and the applicant to cover community benefits ensuring progress on this matter is achieved and is embedded into any agreement?</p>	<p>The Applicant refers to its response to CAPC1-1 above on this matter.</p>



Reference	Comments	Applicant's Response
CAPC3-4	<p>Page 2 (ExQ1. Q3.0.2)</p> <p>Just to confirm this is specifically in relation to Stone Curlew, not Eurasian Curlew as there seems to be confusion. Can we please also ask why current planned mitigation areas are so close to major infrastructure sites potentially reducing their viability as mitigation?</p>	<p>For avoidance of doubt, the mitigation areas are proposed for Eurasian Curlew.</p> <p>Proposed Skylark and Eurasian Curlew mitigation measures are set out within the ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149], incorporating a range of measures including the provision of the specific area of 8ha land managed as grassland for use by ground nesting birds including Eurasian Curlew, commensurate with the existing (low) levels of use of the site recorded (1-2 pairs of Curlew). Impacts of the Scheme on ground nesting birds (in particular Skylark and Eurasian Curlew, including with reference to the proposed mitigation and compensation measures) have been specifically considered within section 7.8 of the ES Chapter 7: Ecology and Biodiversity [REP1-034] which concludes no significant (in EIA terms) effects are anticipated.</p>
CAPC3-5	<p>Page 3 (ExQ1. Q3.0.11)</p> <p>Could we suggest Fields 20, 21, 25 and 26 are removed from the development area and used as mitigation only? There would be a number of benefits gained by removing these fields.</p> <ol style="list-style-type: none"> 1. An important buffer would be created between the A1065 and the first enclosed industrial areas of panels to the west, (fields 19, 22 and 24) reducing the risk of Deer being forced through narrow corridors across the A1065, (ref: PEIR Masterplan Strategies, PEIR Fencing Strategy DWG No 9485 0272) endangering both Deer and motorists alike. 2. By removing development from these fields the impact on the Heritage village of Castle Acre could be reduced as one approaches from the South, travelling north on the A1065. 3. By removing development from these fields 20, 21, 25 and 26 the impact, on the overall historic landscape, visual and amenity, would also be potentially reduced. 	<ol style="list-style-type: none"> 1. Dispersal impacts on wildlife, including mammals such as deer, are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation, as detailed within Section 7.7 of ES Chapter 7: Ecology and Biodiversity [REP1-034] and secured within Design Principles, Parameters and Commitments [APP/5.8.2]. As detailed in ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] Fields 20, 21, 25 and 26 are not considered to make any appreciable contribution to the significance of any designated heritage asset. 2. ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. The LVIA considers visual receptors from publicly accessible areas within Castle Acre and also road users along the A1065. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. Once the mitigation planting is established and matured in the long term, the long term potential effect upon VRG5: Castle Acre is moderate, not significant. The long term potential effect upon users of the A1065 is Slight-Minimal Adverse, not significant (in EIA terms). 3. As discussed above, the LVIA concludes that there would be no potential long term significant visual effects upon visual receptors within the Site and wider LVIA study area. The loss of development within the fields referred to would not alter judgements over significant and non-significant visual effects. Therefore, the Applicant does not consider that the removal of these fields is necessary, important nor significantly beneficial in any way.
<p>Sporle with Palgrave Parish Council - Written Summary of ISH1 [REP1-098]</p>		
SPPC1-1	<p>Page 1, points 1-7, Landscape and Visual</p> <ol style="list-style-type: none"> 1. Sporle with Palgrave parish has the Peddars Way national footpath passing through it which will be considerably impacted by views of the Drovers. The path is used by a great many villagers. 2. The landscape consists of long views across farmland with hedges and trees that although not being of national importance are greatly appreciated by those who live locally. 3. These views will be further impacted by 3 fields of solar array as part of the High Grove development. (northern most solar arrays on the western side of High Grove Central Area). These can be seen from viewpoint V8 shown on figure 6.7 APP-084 as well as along Sporle with Palgrave PRoW's BR4, BR5 and FP11. These fields of 	<ol style="list-style-type: none"> 1. ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. The LVIA considers visual receptors along PRoW, roads and within residential dwellings. Peddars Way is included within the scope of the LVIA. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. 2. ES Chapter 6: Landscape and Visual [AS-016] and accompanying baseline viewpoint photography for all viewpoints considered within the assessment are assessed for potential effects against the Scheme. The LVIA baseline notes the agricultural context of the Site and wider LVIA study area. This baseline has been taken into account when considering receptor value and subsequent sensitivity. 3. Visibility of the Scheme from VP8, particularly the Solar PV Arrays, are noted within ES Chapter 6: Landscape and Visual [AS-016] and shown on ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme (Part A) [AS-039] and ES



Reference	Comments	Applicant's Response
	<p>solar arrays extend to the A1065 from where solar arrays will be visible in fields 21, 23, 24 & 25.</p> <ol style="list-style-type: none"> 4. The reverse views can be seen from Fincham Drove (Southacre PRoW RB6) near Round Covert and viewpoints V2 and V3. 5. Although it is recognised that gapping hedges and planting standard hedgerow trees is planned to reduce visual impact this will in fact change the landscape character by reducing its open nature. Sporle with Palgrave PC would wish to see a reduction in the number of fields with arrays in consultation with High Grove to reduce the visual impact. 6. The various responses to the applications made by Sporle with Palgrave PC show that users of Southacre and Newton roads will be impacted as shown in the area of VRG4 of figure 6.7 of the DCO application. 	<p>Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme (Part A) [AS-045]. It is acknowledged that there would be adverse visual effects for users of the Peddars Way, however these are judged to be not significant in the long term.</p> <ol style="list-style-type: none"> 4. The Applicant notes this comment. These viewpoints are included within ES Chapter 6: Landscape and Visual [AS-016]. 5. Long and 'open' views from some locations, such as those from PRoW South Acre RB7, looking across the Nar Valley northwards, are retained as part of the Scheme. Section 6.11 of ES Chapter 6: Landscape and Visual [AS-016] undertook a Cumulative Effects Assessment which included High Grove Solar Farm which concluded that there would be: <ul style="list-style-type: none"> • significant adverse visual effects during construction for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave; and • significant adverse landscape effects during construction and operation on the E6 North Pickenham Plateau LCA. 6. ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. Newton Road is situated on the edge of the eastern edge of the study area, within VRG4. Along the length of this highway, there would generally be limited intervisibility with the Scheme due to the vegetated nature of the highway and its nearby context. Where visible, the Scheme would form a relatively small element of a wider view. Potential adverse visual effects along Newton Road, which users would be of low receptor sensitivity, would not be significant. Views from South Acre Road are assessed within Viewpoint 7 and 8 of the LVIA. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors along this road.
SPPC1-2	<p>Page 1, point 8, Landscape and Visual</p> <ol style="list-style-type: none"> 8. Notwithstanding the issues regarding the siting of the NGET substation, Sporle with Palgrave PC have requested, in various responses, that mitigation of the visual impacts of the substation is of high priority and that all efforts are made to ensure the 'double turn' option is taken and no second line of pylons is constructed 	<p>ES Chapter 6: Landscape and Visual [AS-016] details that with regard to both the Customer and National Grid Substation mitigation, new linear native woodland blocks are proposed inside the existing field boundaries, along the eastern and western edges of Field 27 and also scrub and copse planting is proposed within the northern area of Field 27, in order to screen and filter potential views of the taller elements of the Scheme from nearby PRoW</p> <p>Secondly, accompanying visualisations have accounted for the worst-case scenario with regard to consideration of retention of existing pylons alongside the new Grid Connection Infrastructure. The assessment concludes that there would be no potential long term significant (in EIA terms) adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant (in EIA terms) adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p>
SPPC1-3	<p>Page 2, point 1-5, Cumulative effects</p> <ol style="list-style-type: none"> 1. Reference was made to document APP-068 figure 2.1 showing a map of cumulative impact as per the methodology set out in ES chapter2. This only extends to a 25km radius. It does not include existing renewable infrastructure already built or in progress. Only major scheme shown is High Grove solar scheme. 2. It was put to the ExA that a more strategic look at the cumulative impacts of all the renewable developments proposed within Norfolk should be undertaken in his examination. The extent of these developments that Norfolk is being asked to bear has been made clear by NCC, local councils and MP's. 	<ol style="list-style-type: none"> 1. The Applicant has undertaken the cumulative assessment in accordance with PINS Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. The guidance states that <i>"Where other existing and, or approved developments are expected to be completed before construction of the proposed NSIP and the effects are fully determined, effects arising from them should be considered as part of the baseline"</i>. The Applicant has therefore not included <i>"existing renewable infrastructure already built or in progress"</i> within the long list presented in ES Appendix 2.4: Cumulative Schemes [APP-136]. The Applicant is seeking agreement on the list of cumulative schemes with the local authorities which the Applicant anticipates will be confirmed within the Statements of Common Ground that have progressed with stakeholders, to be submitted at Deadline 3. The Applicant will also, in accordance with best practice, keep the cumulative list under



Reference	Comments	Applicant's Response
	<p>3. Referring to the list of existing and proposed renewable development in the local area contained in Sporle's statutory consultation response of which two were highlighted: - High Grove and Jafa solar developments (Jafa to the north east of Sporle and west of the Dunhams.)</p> <p>4. Referring to High Grove – Sporle will have at least 1000 acres of this development within the parish boundaries as well as an area of the Droves to the west of the A1065. The cumulative effects will be seen in:</p> <ul style="list-style-type: none"> • Landscape and visual impacts which will be identified in the representation to be made in agenda item 3.5 • Traffic impact on the A1065 during construction if High Grove takes place concurrently or sequentially to the Droves whereby there will be three access operating over a short section of the A1065. It is in the interest of Applicant, landowners, councillors and MP's if this issue is addressed in conjunction with local residents. • Impact on the deer population. The need for a deer management plan to be put in place by both the Droves and High Grove as yet to be seen in any documents. A call for proper deer surveys to be done to assess numbers and to allay concerns about large numbers of deer moving through the landscape that would be corralled down narrow corridors with potential of causing accidents on the A1065. • The above three points highlight the need for the ExA to ensure that, as was requested at the Preliminary Meeting by Sporle with Palgrave PC, there is a full examination of the cumulative impacts even with the delays of the High Grove DCO application. Sporle with Palgrave PC suggested that local representatives be involved in these discussions at the detail level and on the ground. <p>5. Referring to Jafa: This has planning consent and if constructed concurrently or sequentially with the Droves and/or High Grove will cause even greater problems along the A1065. Travel route will leave A1065 at Newton by Castleacre.</p>	<p>review throughout the course of the examination to ensure that it is up to date and the Applicant is committed to submitting an updated version at Deadline 3.</p> <p>2. As detailed in ES Appendix 2.4: Cumulative Schemes [APP-136], the search radius for cumulative schemes is based on the Zone of Influence (Zoi) of 25km, due to this being the largest for considering all types of relevant development. The Zoi of Norfolk has been adopted for assessing NSIPs only in ES Chapter 11: Soils and Agriculture [AS-018], but this has not been presented on ES Figure 2.1: Cumulative Schemes [REP1-042].</p> <p>The cumulative impact of the Scheme and other cumulative developments has been undertaken for impacts within Norfolk for ES Chapter 11: Soils and Agriculture [AS-018]. The Zoi for all other topics assessed as part of the EIA is smaller than Norfolk.</p> <p>3. The Applicant has committed to review and update the long list and, where relevant, the short list of cumulative developments. The Applicant committed to include the Jafa Development during ISH1 within the short list as per the request from Sporle with Palgrave Parish Council. The updated long and short list will be submitted at Deadline 3. X</p> <p>4. Responses to the cumulative effects are set out below:</p> <ul style="list-style-type: none"> • The cumulative assessment of landscape and visual impacts has been presented in ES Chapter 6: Landscape and Visual [AS-016]. This has concluded two significant adverse effects on E6: North Pickenham Plateau LCA and VRG4: Great Palgrave and Little Plagrove. • As detailed in ES Chapter 9: Transport and Access [REP1-036], based on information submitted for the High Grove Solar Farm within the associated PEIR for that scheme, and from collaborative discussions with their project team, it is considered unlikely that there will be any interaction between the two schemes given the intended construction programmes which do not overlap. In any case (i.e. should the construction periods overlap), it is considered that all cumulative traffic flows associated with cumulative schemes, including High Grove, are already inherently accounted for within the TEMPro growth factors utilised within section 9.6 of ES Chapter 9: Transport and Access. • Woodland habitats likely providing the focus of existing deer use will remain outside of the protection fencing, with wide corridors in particular along the droves which will provide continued routes through the Site for deer. These routes will therefore remain largely unchanged from the existing position. <p>5. The Applicant has committed to review and update the long list and, where relevant, the short list of cumulative developments. The Applicant committed to include the Jafa Development during ISH1 within the short list as per the request from Sporle with Palgrave Parish Council. The updated long and short lists will be submitted at Deadline 3.</p>
SPPC1-4	<p>Page 2 and 3, point 6, Cumulative effects</p> <p>6. With all that is planned we will see a change from a rural, agricultural landscape to an industrialised one. The consequences will be:</p> <ul style="list-style-type: none"> • Poorer mental health for those living in the area as the existing natural environment will change to a built one. • A huge experiment with the soils and wildlife over the supposed 60-year life of the Droves. With the substations remaining after then will not this land be lost permanently as there will be a continued need to generate electricity? 	<p>The DCO Application is for a 60-year lifespan, after which the Scheme will be decommissioned with the exception of the National Grid Substation and Grid Connection Infrastructure, which are permanent components. Following decommissioning of the Scheme the land will be returned to the landowner who will then have responsibility of the use and management of the land. In terms of mental health, these matters are considered in ES Chapter 15: Human Health [APP-064]. The assessment found no significant adverse health effects as a result of the Scheme. However, the Applicant recognises that some residents may feel unease as the environment changes. To address this, the Applicant will provide clear and accessible information and maintain ongoing engagement with the community through the Community Liaison Group, as secured through the oCEMP [APP/7.6.2], oOEMP [APP/7.8.2] and oDS [REP1-058]. This is intended to ensure that concerns are heard and responded to throughout the construction and operation phases.</p>



Reference	Comments	Applicant's Response
	<ul style="list-style-type: none"> • Tourism is a large earner for Norfolk. Impact of an industrialised landscape around Castle Acre and the A1065 being a major route to North Norfolk AONB and coast will reduce this vital part of Norfolk's economy. • Impact on jobs and livelihoods. Economically Norfolk will gain little from this and other developments. 	<p>ES Chapter 6: Landscape and Visual [AS-016] details potential effects of the Scheme within the Site and wider LVIA study area, including views from Castle Acre and the A1065. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p> <p>The Applicant acknowledges concerns regarding the potential effects of the Scheme on local tourism. The assessment of effects on local tourism assets in ES Chapter 14: Socio-Economics[APP-063] finds that, while some localised adverse effects on visual amenity and recreational experience may occur, particularly at assets such as Castle Acre Priory and Castle, and along certain PRoWs, these effects are limited in extent and not significant in EIA terms, and would reduce over time through mitigation (including landscape screening and enhancements secured through the oLEMP [REP1-060]).</p> <p>The Applicant notes that local businesses may rely on tourism-related spending. While the assessment in ES Chapter 14: Socio-Economics[APP-063] focuses on the effects on tourism assets, it found no significant effects on those assets in EIA terms. As such, it is reasonable to conclude that there would be no material change in overall visits or tourism activity, and therefore no adverse effect on the revenue of businesses that depend on tourist trade. While effects associated with construction worker expenditure were scoped out of the assessment, it is noted that there may be some limited, short-term increase in local spending during the construction phase.</p> <p>In terms of jobs and livelihoods, the oESSCS [APP-195] sets out proposals to promote local apprenticeships and training schemes, with the aim of enhancing local skills and qualification rates. In addition, as stated in ES Chapter 14: Socio-Economics [APP-063], taking the net direct and net indirect jobs together, the project is expected to support 1,145 net additional jobs during the construction phase, extending over a twenty-four-month period, with between 285 and 575 of these expected to be taken up by local residents. This indicates opportunities for local people during construction and operation.</p>
SPPC1-5	<p>Page 3, point 7, Cumulative effects</p> <p>7. Conclusion: Notwithstanding the government policy for Net Zero by 2050, Norfolk is being asked to carry a heavy burden with the extent of these projects. It is vital that the scale of this project is looked at, and cumulatively with others nearby, to reduce the size and impact before irreparable damage is done.</p>	<p>The Applicant is aware of other projects in the region. Each of the ES Topic Chapters and ES Chapter 18: Summary of Effects [APP-067] consider their cumulative effects. In addition, the Statement of Need [APP-042] and Planning Statement [REP1-012] submitted in support of the DCO Application set out the justification for the Scheme and its proposed location and scale within the context of the clear and urgent national need for low-carbon energy generation.</p>
<p>Sporle with Palgrave Parish Council [REP1-099] - Request for a further Issue Specific Hearing (ISH2)</p>		
SPPC2-1	<p>Page 1</p> <p>Within the Examination time table there is a space provided for an additional Issue Specific Hearing (ISH2) during week commencing 7th September 2026. Sporle with Palgrave Parish Council (PC) would request that this takes place to allow further oral representations from interested parties, questions posed to and responses received from the Applicant.</p> <p>...</p>	<p>The Applicant notes that it is for the Examining Authority to decide if a further Issue Specific Hearing is necessary.</p> <p>The matters raised with regards to transport and access; ecology and biodiversity; and community benefits are responded to in further detail in the corresponding rows below.</p> <p>With regards to cumulative impacts, a Report on Interrelationships between Projects [REP1-066] was submitted at Deadline 1, and focuses on the inter-relationship particularly between the Scheme and High Grove Solar Farm because it was considered that the inter-relationships with other NSIPs within Norfolk would be limited. It will continue to be updated at subsequent deadlines as necessary.</p>



Reference	Comments	Applicant's Response
	<p>However, there was not the opportunity to deal with further issue specific matters relating to:</p> <ul style="list-style-type: none"> • Transport and access • Ecology and Biodiversity • Community benefits <p>The PC would request a further opportunity to raise cumulative impact issues particularly in relation to the High Grove scheme.</p>	
SPPC2-2	<p>Page 1</p> <p>The reason that the PC wishes these issues to be aired is as follows:</p> <p>1. Transport and Access</p> <p>Representations have been made which have included concerns relating to construction traffic and access to the site particularly in relation to the cumulative impacts of other solar developments. However, this is one of the most concerning issues in relation to the Scheme because of its effect on communities and local people over a considerable period. This needs more time and opportunity for interested parties to examine, comment and question the Applicants plans in the light of the ExA's questions, answers received and local authority LIR's.</p>	<p>The assessment of the construction traffic and cumulative related effects on the local road network have been considered within ES Chapter 9: Transport and Access [REP1-036] which concludes there are no significant effects anticipated.</p>
SPPC2-3	<p>Pages 1 and 2</p> <p>2. Ecology and Biodiversity</p> <p>Significant representations have been made in the Open Hearing OH1 regarding ground nesting birds and other issues relating to ecology and biodiversity, particularly the impact of deer numbers and the lack of deer management plans which were brought up in ISH1. It is noted that the ExQ1 has asked for comments from Natural England and the Applicant in relation to these as well as other ecology and biodiversity matters.</p> <p>However, this is an issue of considerable significance in relation to the Applicant's claims of obtaining in excess of 10% BNG in the Biodiversity Net Gain Assessment Report (APP – 0184). These claims need further time and opportunity for interested parties to fully examine and respond to Natural England's and the Applicant's comments.</p> <p>In the PC's RR (RR-054), as well as their statutory consultation response, comment was made on the need for community liaison which was acknowledged by the Applicant. The PC also commented on the need for tight management of the scheme over its 60 year operating life. They were particularly concerned with biodiversity loss due to poor operational management potentially caused by the likely changes of owner/operator during the operational phase of the scheme. It was noted in the oOEMP that a Community Liaison Manager was mentioned and concern was expressed whether the Scheme Operator would continue through the operational phase to have someone dedicated to that role. This was only mentioned in Table 3-10 Human Health within the oOEMP.</p> <p>Notwithstanding the significant issues relating to ecology and biodiversity such as those mentioned above, to maintain the claimed BNG, it is important that the issue of the operational management of the scheme is also examined in more detail and again for time and opportunity to fully respond to what is being proposed.</p>	<p>To ensure that sensitive ecological receptors are protected through the construction of the Scheme, measures to be adhered to are set out within the oCEMP [APP/7.6.2]. These include, but are not limited to, measures to control noise, light, and pollution. In addition, a Ground Nesting Bird Strategy has been prepared to fully mitigate potential impacts on these species (see ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]).</p> <p>Woodland habitats likely providing the focus of existing deer use will remain outside of the protection fencing, with wide corridors in particular along the droves which will provide continued routes through the Site for deer, as secured by Design Principles, Parameters and Commitments [APP/5.8.2]. These routes will therefore remain largely unchanged from the existing position. HM Government's England Deer Strategy sets out actions proposed in England to ensure the impacts of wild deer are not a threat to environmental, social). Measures will be incorporated into the detailed Landscape and Ecological Management Plan in order to ensure compliance with this strategy, where appropriate, as secured within the oLEMP [REP1-060].</p> <p>The Applicant has updated the oOEMP [APP/7.8.2] as submitted at Deadline 2 to provide greater clarity regarding the role of the Community Liaison Manager during the operational phase.</p>
SPPC2-4	<p>Page 2</p>	<p>As outlined within the previous response PPC20 to Sporle with Palgrave Parish Council at Table 2.4 within the Applicant's Response to Relevant Representations [REP1-067], the Applicant</p>



Reference	Comments	Applicant's Response
	<p>3. Community Benefits</p> <p>There are still no specific proposals as regards to what Community Benefits the Applicant is proposing. This was commented on in RR-054. It is noted that High Grove has extended the number of communities they are willing to help to those who are impacted by the resulting traffic during construction and decommissioning, yet not adjacent to their scheme. This includes those who would also be affected by the Droves. The PC is asking along with other PC's for detail discussions to take place with the Applicant on what could be expected. If these discussions are not forthcoming the PC is asking that time be set aside to discuss this issue too in ISH2.</p>	<p>welcomes further engagement with Sporle with Palgrave Parish Council in relation to the Community Benefit Fund.</p> <p>As detailed within the original response to Q1.0.2 within Applicant's Response to ExQ1 [REP1-069], the Planning Statement details other community benefits which will be realised at the local level. For example, permissive paths are proposed through the oPROWPPMP [APP-192]. This document will be secured in full by Requirement 16 of Schedule 2 of the draft DCO [APP/3.1.2].</p> <p>Other benefits, discussed in further detail in the original response, include those outlined within the oESSCS [APP-195]. This document will be secured through Requirement 18 of the draft DCO [APP/3.1.2].</p> <p>Furthermore, it is now clarified that the benefits previously discussed within the oLEMP [REP1-060] will be secured in detail through Requirement 7 of the draft DCO [APP/3.1.2].</p>
SPPC2-5	<p>Page 2</p> <p>4. Cumulative Impacts</p> <p>The PC expressed their concerns both in the PM and ISH1 agenda 3.3 regarding the need for the ExA to be cognisant in his examination of the considerable cumulative impacts of the Droves and High Grove and their interrelated nature; for example, in terms of traffic, deer management and, importantly, landscape and visual. It is noted that these have been acknowledged by the ExA and requests made for landscape and visual issues to be looked at in more detail by the Applicant.</p> <p>Many of the PC's concerns stem from the fact that the Droves Examination is taking place in the light of High Grove not submitting their DCO application until at least October 2026. The PC is unhappy with the level of collaboration and contact between the Applicant and High Grove that we believe has taken place to date, particularly when both schemes butt right up to each other across the A1065 and in adjacent fields on the south side of the Scheme.</p> <p>Sporle with Palgrave PC, along with other PC's impacted by the Droves, will be taking steps to engage with High Grove and the Applicant in the coming weeks to see if their concerns can be resolved in terms of the design of both Schemes and the mitigation possible. However, the PC would request that there is an opportunity for this process to be reviewed and further representations made possible by interested parties at ISH2. At this stage there will be approximately 6 weeks before the conclusion of the Examination and hopefully the opportunity for more detailed engagement with High Grove's proposals. (It is noted that when High Grove were proposing to make their DCO application in April 2026 they were looking to have meetings with individual PC's affected in the month preceding the submission to discuss their application. The PC hopes this will still be the case before they possibly submit their DCO application in October.)</p>	<p>The Applicant has responded to matters regarding the cumulative assessment methodology within Section 2.4 of Applicant's Response to Relevant Representations [REP1-067], which sets out that the assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and the Planning Inspectorate's advice note on Cumulative Effects Assessment.</p> <p>The Planning Inspectorate's advice note on Cumulative Effects Assessment recognises that there will be a varying level of detail available depending on the stage of any cumulative development and that the cumulative assessment should be undertaken at a level of detail proportionate to the information available.</p> <p>The Applicant would also note that the High Grove Solar Farm will be required to undertake a comprehensive cumulative impact assessment as part of the Environmental Impact Assessment to support their DCO Application. The Environmental Statement accompanying the High Grove DCO application will present the cumulative assessment based upon the detail set out in the Droves Solar Farm DCO application and the detail of the High Grove Solar Farm, along with any further mitigation measures if required.</p> <p>The cumulative impacts from The Droves and High Grove have been discussed in previous responses in this table in respect of traffic, deer management, and landscape and visual.</p> <p>The Applicant has engaged and collaborated with the applicant of the High Grove, the details of which are set out within the Report on Interrelationships between Projects [REP1-066].</p> <p>The Applicant welcomes the opportunity for further engagement Sporle with Palgrave PC during the examination process.</p> <p>The Applicant is unable to comment on any commitments made by the High Grove applicant.</p>
Swaffham Town Council [REP1-100]- Written Representation		
SWTC1	<p>Page 1</p> <p>Swaffham Town Council welcomes the opportunity to comment on the Inspector's recent publication arising from Issue Specific Hearing 1, specifically:</p> <p>Action Plan No. 13 – The Applicant to engage with Parish Councils, including on the subject of community benefit.</p> <p>At the time of writing, Swaffham Town Council has not yet met with the Applicant to discuss potential community benefit arrangements associated with the Droves Solar</p>	<p>The Applicant notes the fact that they have not yet met with Swaffham Town Council (STC) although attempts were made during the Statutory Consultation period to engage with STC. The Applicant would welcome such meeting at a time convenient for STC.</p> <p>Regardless of this, the Applicant recognises the proximity of Swaffham to the Scheme and the impact that the Scheme could have on the town.</p>



Reference	Comments	Applicant's Response
	<p>Farm proposal. As the principal service centre for the surrounding rural area, Swaffham provides a wide range of facilities, services and amenities that are used not only by its own residents but also by those living in neighbouring villages. The scale, nature and long-term delivery of any community benefit package are therefore important considerations in assessing the overall impact of the proposal and in informing the level of local support or concern.</p> <p>The Town Council has identified a number of priority projects that would deliver significant public benefit but currently lack sufficient funding, including:</p> <ol style="list-style-type: none"> 1. Improvements to sports and leisure facilities. 2. Provision and enhancement of swimming pool facilities. 3. Development of safe pedestrian and cycle connections between existing routes and rights of way, including urgent improvements to routes serving local schools. 4. Reinstatement and enhancement of former railway corridors for walking and cycling, including links west towards King's Lynn, east towards Dereham, and south towards Watton. 	<p>The Applicant's approach to Community Benefit Funding is set out in detail in response to CAPC3-2 above, including how this will likely be administered and the duration. Notwithstanding this, the Applicant can consider the requests and discuss further with STC on this matter.</p>
SWTC2	<p>Page 1</p> <p>In addition, the Town Council considers it essential that the Applicant provides a comprehensive Traffic Management Plan addressing both construction and operational phases of the development. Such a plan should fully assess and mitigate the impacts of traffic movements on:</p> <ul style="list-style-type: none"> • Air quality and pollution; • Noise and vibration; • Traffic congestion and highway safety; • The town's historic environment and heritage assets; and • Existing and proposed pedestrian and cycling routes. <p>The Plan should include clear measures to minimise heavy goods vehicle movements through the town wherever possible and to protect residents' quality of life, local amenity and the safe operation of the transport network throughout the lifetime of the project.</p>	<p>An outline Construction Traffic Management Plan (oCTMP) [REP1-052] and outline Operational Traffic Management Plan (oOTMP) [REP1-056] have been prepared and are proposed to be secured by way of requirements in the DCO to mitigate the associated construction and operational traffic impacts, including providing details on the routing, timing and any required mitigation on the local highway network for vehicles.</p> <p>The routing for vehicles which is secured through the oCTMP [REP1-052] and oOTMP [REP1-056] restricts vehicles to avoiding local roads and Towns and instead routing via the Strategic Road Network, where possible. The oCTMP [REP1-052] and oOTMP [REP1-056] contain measures to mitigate against any impacts on the existing and proposed pedestrian and cycle routes within the vicinity of the Scheme.</p> <p>An oCEMP [APP/7.6.2] has also been prepared and is proposed to be secured by way of requirement in the DCO which includes associated mitigation measures on the wider environmental effects, such as those associated with noise and vibration and air quality and pollution.</p>
<p>Borough Council of Kings Lynn and West Norfolk [REP1-077] – Written Representation</p>		
KLWN1-1	<p>Para 2.2</p> <p>The proposed development area is a unique and special area and this development would introduce a significant amount of intrusive industrial infrastructure. The use of large expanses of farmland for solar panels and associated infrastructure including substations, transformers and battery energy storage systems will result in effects on the undeveloped serene character of the area and will dramatically and significantly alter the landscape and functioning of the area and the setting of highly important heritage assets.</p>	<p>ES Chapter 6: Landscape and Visual [AS-016] assesses the potential landscape and visual impacts as a result of the Scheme for the Site and wider study area. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area, including publicly accessible views from within Castle Acre. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p>
KLWN1-2	<p>Para 2.3</p> <p>Local residents, local groups, and local Members of Parliament have raised serious concerns as part of representations to the Council and directly to the Examining Authority</p>	<p>The Applicant notes these concerns, and refers to its full response at KLWN1-8 with regards to cumulative landscape impacts; KLWN1-6 with regards to the grid connection; and KLWN1-7 with</p>



Reference	Comments	Applicant's Response
	<p>regarding the impact of the development on the area and have highlighted inadequacies in the application material in relation to a number of environmental topics. The Council also note the concerns raised by Norfolk County Council and Breckland District Council in regard to various matters including cumulative landscape impacts, grid connection uncertainties, and loss of agricultural land both independently and cumulatively and shares many of these concerns.</p>	<p>regard for the loss of agricultural land. The Applicant will respond to submissions by other councils and members of the public at each deadline of the examination as relevant.</p>
KLWN1-3	<p>Paras 4.1 - 4.4</p> <p>The application site is in an area which is rich in designated sites of historic significance concentrated within the settlements of Castle Acre, West Acre, and South Acre. Assets such as Castle Acre Castle and Priory, the Church of St James, and the Castle Acre Conservation Area gain part of their significance from their wider setting. The industrialisation of the landscape will result in harm to these heritage assets. The level and assessment of harm is a matter of disagreement for the Council.</p> <p>Castle Acre Castle is positioned within the valley setting in a position which commands views across the landscape – its elevated position and the far reaching views available to and from this asset form a key part of its significance given that the purpose of a Castle is to allow the security and defence of the surrounding landscape from invasion. It is not therefore correct to suggest that the asset's significance is primarily derived from its physical form.</p> <p>Furthermore, the Conservation Area at Castle Acre comprises a collection of heritage assets, both designated and non-designated, that as a whole have a harmonious and coherent story to tell when viewed collectively as a group and as part of the landscape in which they sit. The pan tiled roofs of the main village guide the eye towards the more prominent civic buildings and this long view from the undeveloped countryside setting, the village and the civic buildings such as the Castle, the Church and the Priory shows a clear visual interpretation of the hierarchy of power.</p> <p>The proposed solar development has the potential to impact the setting of these heritage assets by dramatically changing the character of the landscape, the rural qualities of which are key to the understanding and context of these important buildings and places. The proposed mitigation, which largely relies upon additional landscaping, will not remove the harm and in places has the opportunity to itself lead to harm. It is not clear to the Council at this time that the mitigation has been sufficiently detailed to allow a positive judgement of the harm versus community benefits.</p>	<p>The impacts of the Scheme are presented within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets due to the lack of shared experience between the plateau land and the heritage assets, which is a prerequisite for contribution to significance. Large tracts of agricultural land lie between the Order limits and the assets, and the understanding and context of these assets will, therefore, remain to be clearly appreciated.</p> <p>As detailed in ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057] the significance of Castle Acre Castle is primarily vested in its physical form. Setting does make a large contribution to significance (though not all aspects of setting make an equal contribution), but without the physical monument there would be no setting to be considered. Without setting, the monument would still retain heritage significance (albeit greatly reduced). It must, therefore, be recognised that physical remains are the primary aspect of significance.</p>
KLWN1-4	<p>Paras 5.1 - 5.3</p> <p>The proposal will result in the direct loss of arable habitat and therefore the loss of breeding and foraging habitat for various species. The assemblage of breeding birds on the site includes priority species and the site is known to provide habitat for bat species. Disturbance during construction activity and throughout operation could have adverse impacts on local populations. Natural England and the Norfolk Wildlife Trust have raised potential concern over the position of pylons within the curlew mitigation land, whereby predator species may use the pylon line to perch above protected species. The predator exclusion measures for this mitigation land therefore should be clarified and reviewed. A lighting strategy is required to prevent impacts on bats.</p> <p>The Council welcomes the commitment to a minimum 10% uplift for biodiversity net gain and would encourage that this is appropriately secured through submission of a Habitat Management and Monitoring Plan or similar.</p>	<p>Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [REP1-034], including with specific reference to international, national and locally designated sites of ecological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. ES Chapter 7: Ecology and Biodiversity [REP1-034] concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, no adverse likely significant effects are anticipated on any receptors.</p> <p>To ensure that sensitive ecological receptors are protected through the construction of the Scheme, measures to be adhered to are set out within the oCEMP [APP/7.6.2]. These include, but are not limited to, measures to control noise, light, and pollution. In addition, a Ground Nesting Bird Strategy has been prepared to fully mitigate potential impacts on these species (see ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]).</p> <p>Proposed Skylark and Eurasian Curlew mitigation measures are set out within the ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-</p>



Reference	Comments	Applicant's Response
	<p>Various mitigation measures and management plans are intended to prevent impacts upon protected sites. These measures must be adequately secured for each stage of the process in order to prevent impacts upon areas such as the Nar Valley and its sensitive waterbodies.</p>	<p>149 incorporating a range of measures including the provision of the specific area of 8ha land managed as grassland for use by ground nesting birds including Eurasian Curlew, commensurate with the existing (low) levels of use of the site recorded (1-2 pairs of Eurasian Curlew). Impacts of the Scheme on ground nesting birds (in particular Skylark and Eurasian Curlew, including with reference to the proposed mitigation and compensation measures) have been specifically considered within section 7.8 of the ES Chapter 7: Ecology and Biodiversity [REP1-034] which concludes no significant effects are anticipated.</p> <p>Design Principles in relation to ongoing management measures are secured in the oLEMP [REP1-060]. Specific predator-exclusion measures would be anticipated to include secure fencing, further details of which, along with monitoring measures would be set out within the detailed Landscape and Ecological Management Plan, as secured through Requirement 7 in Schedule 2 to the draft DCO [APP/3.1.2] (including delivery of relevant mitigation for the duration of the operational lifespan).</p> <p>The Applicant notes that the draft DCO [APP/3.1.2], at Requirement 9 of Schedule 2, ensures that <i>“no part of the authorised development may commence until a biodiversity net gain strategy [which must contain details of how the minimum 10% BNG is secured] has been submitted to and approved by the relevant planning authority for that part in consultation with the relevant statutory nature conservation body”</i>.</p> <p>Information in regard to detailed management actions, timings and monitoring will be provided within the detailed Landscape and Ecological Management Plan, as secured through Requirement 7 in Schedule 2 to the draft DCO [APP/3.1.2]. Further, detailed measures and monitoring requirements (including management actions, timings and monitoring methodologies) will be reviewed during the operational process (for example to take into account changes in the fauna present and reflect any future colonisation or remediation measures that may occur). In addition, specific habitat monitoring and remedial measures (where necessary) will be required as part of the BNG commitments, including within the detailed Landscape and Ecological Management Plan, as secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.2].</p> <p>Embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse, are secured through the oCEMP [APP/7.6.2].</p>
<p>KLWN1-5</p>	<p>Para 6.1</p> <p>The position of RAF Marham as a key employment site for the Borough and its contribution to the Nation's security is represented throughout our Local Plan – including in particular Policy LP10. The Council raise significant concern over the implications of the issues raised by the Defence Infrastructure Organisation (DIO) – both in terms of impacts upon site safeguarding and the precision radar systems as a result of the development itself, however also conversely in regard to the landscape setting implications of any required mitigation to overcome these concerns. The construction of an extensive bund, fence, or wall could have significant landscape implications which are not possible to assess in the absence of any clarity on this matter.</p>	<p>The Applicant has had further engagement with the Ministry of Defence (MoD) following Deadline 1 regarding the potential mitigation solutions to resolve the potential impacts to radar and aviation receptors. The Applicant is working through potential mitigation options with the MoD which will be confirmed at a future deadline. Following this process, a review of the potential for any likely significant effects will be undertaken and, if necessary, further assessment will be undertaken. This would include, as appropriate and necessary, consideration of landscape and visual, biodiversity, land use, and interactions between topics (in-combination effects).</p>
<p>KLWN1-6</p>	<p>Paras 7.1 - 7.3</p> <p>The Applicant has previously set their position in regard to their Grid Connection Offer and are continuing to seek consent via this DCO application. Our engagement to date is based upon the plans and supporting information as submitted. The lack of a formal connection offer continues to raise concern from the Borough Council's perspective as to the uncertain details of the proposal.</p>	<p>The Applicant notes this concern and refers to its full response to CAPC2-21 above on this matter.</p>



Reference	Comments	Applicant's Response
	<p>Ultimately, it is a matter for the Examining Authority to consider whether or not the proposal has been suitably detailed to allow assessment of the significant effects on the environment and to comply with the relevant regulations.</p> <p>As noted during pre-application discussions, the position of key infrastructure is a key concern for BCKLWN, and any change to the grid connection would likely result in knock on impacts, for example on the incredibly sensitive historic setting or the surrounding landscape and this may alter the Borough Council's stance to the development as a whole.</p>	
KLWN1-7	<p>Para 8.1</p> <p>Approximately 55% of the site falls within the definition of Best and Most Versatile (BMV) agricultural land. Whilst the 60 year decommissioning timeframe set out by Requirement 20 is noted, the loss of BMV, particularly in combination with other schemes across Norfolk as a whole is a concern for the Borough Council.</p>	<p>As outlined within the previous response at BCKLWN51 within Table 2.3 of the Applicant's Response to Relevant Representations [REP1-067], the land quality of the land across the Order limits is described within ES Chapter 11: Soils and Agriculture [AS-018] with the proportion of land that is of BMV quality comprising 54% of the Site.</p> <p>ES Chapter 11: Soils and Agriculture [AS-018] identifies no significant effects as a result of the Scheme in isolation; however, a significant effect on BMV land is identified through the cumulative effects assessment, as a result of the cumulative permanent loss of BMV land as a result of the Scheme and other identified cumulative schemes (including High Grove Solar). However, as detailed further within the response to BCKLWN51 within Table 2.3 of Applicant's Response to Relevant Representations [REP1-067], in real terms this represents a fractional loss of total BMV land permanently lost as a result of the cumulative developments.</p>
KLWN1-8	<p>Paras 8.2 and 8.3</p> <p>In regard to cumulative impacts more generally, The Borough Council support the concerns of Norfolk County Council and Breckland District Council raised at Relevant Representations stage in regard to the in-combination effects of solar developments across Norfolk as a whole.</p> <p>Particular attention is drawn to the potential implications of High Grove Solar Farm to the east of the site which also adjoins Swaffham and the potential in-combination effects on adjoining settlements, in particular in relation to the landscape and heritage assets as discussed above.</p>	<p>The Applicant has responded to matters regarding the cumulative assessment methodology raised by Norfolk County Council and Breckland Council within Section 2.1 and 2.2 of Applicant's Response to Relevant Representations [REP1-067], which sets out that the assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and the Planning Inspectorate's advice note on Cumulative Effects Assessment.</p> <p>The Applicant notes that the cumulative assessment set out within the Environmental Statement has considered the cumulative impacts of High Grove. A Deadline 1, the Applicant submitted a Report on Interrelationships between Projects [REP1-066] which details the relationship between the Scheme and High Grove.</p>
KLWN1-9	<p>Para 9.1</p> <p>Whilst the Council acknowledges the contribution that the proposed development would make towards achieving the goals of energy security and renewable energy generation, the Council questions compliance with policies aimed at minimising harm and protecting the landscape and natural environment within the local area and whether the relevant planning policies have been demonstrably met in relation to the proposed scheme.</p>	<p>Paragraph 9.4.18 of the Planning Balance section in the Planning Statement [REP1-012] concludes that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.</p> <p>The Applicant has also demonstrated compliance with the relevant policies in the Policy Compliance Document [REP1-014].</p>
<p>Borough Council of Kings Lynn and West Norfolk [REP1-078] – Response on topics and agenda items at ISH1</p>		
KLWN2-1	<p>Topic and Agenda Item 3.2 ExA's comments</p> <p>Agree (with NCC and other comments) - this issue is fundamental. No guarantee a TCPA app or similar would be supported or granted. Significant conversations took place and amendments were made at the pre-Application stage. Ultimately, the Application will be considered as submitted and additional impacts/comments discussed later on in the Agenda and examination.</p>	<p>The Applicant notes this concern and refers to its full response to CAPC2-21 above on this matter.</p>



Reference	Comments	Applicant's Response
KLWN2-2	<p>Cumulative Effects 3.3</p> <p>a) agreement to list of schemes scoped in and topics covered in each chapter</p> <p>b) no particular concerns at this stage.</p>	<p>The Applicant notes this response. This is confirmed within Table 6 of the Statement of Common Ground with Borough Council of King's Lynn and West Norfolk [REP1-027].</p>
KLWN2-3	<p>Aviation 3.4</p> <p>Any solution is not just a matter of satisfying the DIO/MOD – potentially significant knock on impacts on landscape or heritage with any required physical mitigatory works.</p>	<p>The Applicant has had further engagement with the MoD following Deadline 1 regarding the potential mitigation solutions to resolve the potential impacts to radar and aviation receptors. The Applicant is working through potential mitigation options with the MoD which will be confirmed at a future deadline. Following this process, a review of the potential for any likely significant effects will be undertaken and, if necessary, further assessment will be undertaken. This would include, as appropriate and necessary, consideration of landscape and visual, biodiversity, land use, and interactions between topics (in-combination effects).</p>
KLWN2-4	<p>Landscape and Visual 3.5</p> <p>We are working with Breckland District Council and provided additional viewpoints for consideration by the ExA as part of Deadline A.</p> <p>We acknowledge that the applicant has worked with us to mitigate harm which the LVIA acknowledges cannot be fully mitigated.</p> <p>Relocation of substation has listened to KLWN concerns and mitigated harm however there are some outstanding concerns regarding treatment of mitigation of actual droves.</p> <p>Mitigation measures will result in framed views of substations for users of the landscape. The mitigation measures themselves could therefore result in a negative impact.</p> <p>Requested additional visualisations of Petticoat Drove, Palgrave Manor etc, those viewpoints put forward to Deadline A.</p> <p>Mitigation - careful with this landscape historic character - 17/18/19th century. Breckland's character assessment does thoroughly assess from heritage perspective. Introduction of new landscaping itself could cause harm. Framing views, other pieces of landscape could be harmed in the longer term.</p> <p>Whilst the Council acknowledge our in-depth discussions on the impact of panels and substations, the impact of lighting/fencing/other related infrastructure also needs to be considered. This is a very special landscape. The lighting turning on/off when needed does not remove harm.</p> <p>Fencing along A1065 and surrounding fields will result in additional visual impact from this paraphernalia. Every piece of additional infrastructure has an additional impact over and above that which is already identified as having a degree of harm. Noted to be 'locally appropriate' but lots of this would be entirely new/alien feature given the intensely rural and undeveloped landscape area.</p>	<p>ES Chapter 6: Landscape and Visual [AS-016] states that with regard to additional mitigation, mitigation for LVIA involves planting throughout the Site which is embedded into the Scheme and secured in the design, meaning additional mitigation is not available. No additional mitigation measures for the Scheme are proposed.</p> <p>Through discussion and agreement with KLWN, a number of additional viewpoints will be included within the ES Chapter 6: Landscape and Visual [AS-016] at Deadline 3.</p> <p>Mitigation alongside the Drovers includes a proposed maintenance and management of hedgerow heights at 3m, which serves to not only screen views towards the Scheme from the PRoW within the Site but also reinforces the existing character of the landscape within the Site and host landscape character area. Generally, the Drovers are either lined with hedgerow, trees, scrub or woodland blocks; the mitigation planting proposals use these same planting typologies to ensure the mitigation is in-keeping with the local landscape and therefore restores and reinforces the landscape character of the Site. The mitigation planting serves to screen short distance views towards the Scheme, limiting potentially significant visual effects in the long term and generally leading to a restoration and re-establishment of the landscape fabric that once aligned these routes.</p> <p>In discussion with KLWN, the Applicant has demonstrated that there would be in no way 'framed views' towards the Customer or National Grid Substations.</p> <p>The reference to 'visualisations' should be viewpoints instead. Through discussion and agreement with KLWN, a number of additional viewpoints will be included within the ES Chapter 6: Landscape and Visual [AS-016] at Deadline 3.</p> <p>ES Chapter 6: Landscape and Visual [AS-016] concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p> <p>In discussion with KLWN, the Applicant has outlined the lack of lighting associated with the Scheme. The consideration of exact specification of lighting and/or fencing is a matter for the detailed design stage. The Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation and within the BESS compound, which would only include motion sensing lighting and be used to maintain safe working conditions in winter months, security purposes, and maintenance activities as secured within the oOEMP [APP/7.8.2] and explained in ES Chapter 5: The Scheme [REP1-032].</p> <p>Fencing along the A1065 would be situated to the west of the existing/enhanced hedgerow. Once established, this hedgerow would be maintained at a minimum height of 3m and therefore visibility</p>



Reference	Comments	Applicant's Response
KLWN2-5	<p>Cultural Heritage 3.6</p> <p>The main matter of concern is the fundamental understanding of why these buildings are where they are and are what they are. Castles were built to dominate their surrounding landscape and Castle Acre does this particularly well. The valley setting is also rare for Norfolk, visible from a distance - e.g A1065, as is the land's relationship with the church and priory. The scheme impacts upon a Scheduled Monument and Grade 1 buildings of the highest significance.</p> <p>Ultimately the purpose of a castle is that it is visible to/from wider areas and provides views towards wide distance. The view back towards the castle and landscape is just as important as the view from the castle grounds outwards.</p> <p>It is hard to link heritage considerations discussed in the heritage submission with the content of the LVIA,. Given the considerations at hand these documents ought to be better linked. The castle was always intended to be visible and is supposed to have views. Its dominance in the landscape is key and the Council would argue its setting is intrinsic to significance as the Castle was constructed there for a reason.</p> <p>In terms of the Conservation Area, this is a collection of highly grade assets and non-designated assets (see Castle Acre Conservation Area Appraisal). The Conservation Area is visible and recognisable from the A1065 as a grouping of buildings and built to be visible from distances away. The pantile roofs for example are highly visible on approach. The solar panels and associated paraphernalia would all be highly visible in this same viewpoint.</p> <p>Whilst the Council agree with less than substantial to Castle Acre Castle, it is not a low level of less substantial. The level of harm should be considered as at least moderate as a result of the intrinsic significance. The significance is not just aesthetic and the Council agree with Historic England in this regard.</p> <p>The clearly perceptible change in character from one of agriculture to semi industrialised would be harmful to appreciation of the castle's command over the landscape as a whole. As you breach the ridge adjacent to Barts Hill, appreciation of Castle Acre as a village - conservation area impact is moderate, castle setting is moderate. Built to command over the landscape views. Stick to moderate.</p>	<p>of the fence from the highway would be limited. The LVIA concludes that there would be no potential long term significant adverse visual effects upon visual receptors along the A1065.</p> <p>The impacts of the Scheme are presented within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets due to the lack of shared experience between the plateau land and the heritage assets, which is a prerequisite for contribution to significance. In terms of the scales of impact as defined in ES Chapter 8: Cultural Heritage and Archaeology [APP-057], in order to be a moderate impact there would need to be considerable harm to a heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost. This is a relatively high level of impact which is not reflected by the proposals, which would retain the village siting, the visual and spatial connection between the assets, the connection to the Peddars Way and the vast majority of the surrounding landscape visible from the heritage assets. The majority of views will be unchanged, with only very small elements of the wider Scheme (at least partially screened under the proposals) remaining.</p>
<p>Little Dunham Parish Council [REP1-089] - Written Representation</p>		
LDPC1	<p>Page 1</p> <p>Little Dunham Parish Council objects to this application on the grounds that it would have an adverse cumulative impact on the overall character, beauty and skyline to the area.</p> <p>The Inspector will be familiar with the provisions of National Planning Policy Statement EN-1. We would suggest that in determining this application the Inspector needs to consider the combined effects of how the proposal will interact with other existing, proposed or reasonably foreseeable developments in the area. This part of Norfolk is geographically described as a plateau landscape with wide, open vistas. Bunds or other mitigation measures would be alien to such a landscape.</p> <p>We already have an enormous sub-station development in Necton, twelve wind turbines on the old North Pickenham Airfield and a permitted solar array in Little Dunham and</p>	<p>The Applicant notes the concerns of Little Dunham Parish Council. The Applicant has responded to matters regarding the cumulative assessment methodology within Applicant's Response to Relevant Representations [REP1-067], which sets out that the assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and the Planning Inspectorate's advice note on Cumulative Effects Assessment.</p> <p>The Applicant notes that Section 6.11 of ES Chapter 6: Landscape and Visual [AS-016] undertook a Cumulative Effects Assessment which included High Grove Solar Farm which concluded that there would be:</p> <ul style="list-style-type: none"> significant adverse visual effects during construction for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave; and



Reference	Comments	Applicant's Response
	Great Dunham. There is a proposed large solar array on disparate parcels of land from Beachamwell to Wendling. It is our submission that no amount of landscape mitigation would satisfactorily screen the panels, batteries and sub-stations proposed by the applicants. There would therefore be a cumulative negative impact on the area and so we would suggest that the application should be refused	<ul style="list-style-type: none"> significant adverse landscape effects during construction and operation on the E6 North Pickenham Plateau LCA. <p>However, as outlined within Paragraph 9.4.18 of the Planning Statement [REP1-012], the adverse impacts identified are clearly outweighed by the substantial public benefits that would arise, including from providing low-carbon energy to meet the needs identified in NPS EN-1. The benefits of the Scheme are outlined in detail at section 5.3 of the Planning Statement [REP1-012].</p>
Breckland Council [REP1-080]- Response to ExA written questions		
BC1	<p>ExQ1 Q5.0.8</p> <p>The Council is not aware of any land or rights being required in addition to those identified within the draft Development Consent Order (dDCO) that would prevent the development from becoming operational.</p> <p>The Council has not identified any specific impediments beyond those matters set out in the application documentation and therefore does not raise any additional concerns at this stage</p>	The Applicant notes this response.
BC2	<p>ExQ1 Q7.5.6</p> <p>The Council confirms that it is content with the wording of Requirement 18 relating to skills, supply chain and employment and has no further comments.</p>	The Applicant is grateful for the confirmation that the Breckland Council is content with the wording of Requirement 18 of the draft DCO [APP/3.1.2] .
BC3	<p>ExQ1 Q10.0.9</p> <p>The Council notes the Applicant's position that leaving underground cables in situ may reduce the short-term environmental impacts associated with their removal, including disturbance to soils, habitats and local receptors.</p> <p>From a planning perspective, the Council considers that a balancing exercise is required between:</p> <ul style="list-style-type: none"> the short-term environmental impacts of decommissioning works; and the longer-term implications for the future use of the land, including agricultural use. <p>The Council does not hold detailed technical expertise in relation to underground infrastructure and therefore defers to Norfolk County Council and other relevant consultees on the technical implications of this approach.</p> <p>However, the Council considers that the acceptability of this approach will depend on whether the long-term use of the land, including agricultural use, would be materially constrained. Please refer to the LIR for further detail on the Council's significant concerns in this regard.</p>	Cables that are buried sufficiently deeply that they will not inhibit future agricultural use, including normal arable machinery or periodic operations such as field drainage, can safely be left in situ. This will need to be determined on a case-by-case stage at decommissioning. The Applicant also refers to its responses to the Council's LIR (see Applicant's Response to Local Impact Reports [APP/8.12]) on this matter.
BC4	<p>ExQ1 Q13.0.1</p> <p>The Council has consulted its Environmental Health Officer in relation to the submitted Noise and Vibration Assessment.</p> <p>The Council confirms that it agrees with the assessment methodology, which is considered to be appropriate and consistent with relevant guidance.</p>	The Applicant welcomes this comment.
BC5	<p>ExQ1 Q13.0.3</p>	The Applicant notes this comment. ES Chapter 10: Noise and Vibration [APP-059] present embedded and additional mitigation measures for the road upgrade works near 'The Splashes'



Reference	Comments	Applicant's Response
	<p>The Council has reviewed the Equality Impact Assessment in consultation with its Environmental Health Officer.</p> <p>The Council notes that the potential noise and vibration effects at The Splashes Campsite would arise from works associated with an access route. In this context, the Council highlights that occupants at the site reside in caravans or similar structures, which typically provide lower levels of acoustic attenuation than conventional dwellings. In addition, during warmer months, windows and doors are likely to be open for ventilation, which may increase sensitivity to noise.</p> <p>Having regard to this, the Council considers it important that:</p> <ul style="list-style-type: none"> • works are restricted to sociable hours; and • the duration of works is clearly defined and controlled. <p>Subject to confirmation of these matters, the Council agrees that a detailed noise assessment is not required, provided that:</p> <ul style="list-style-type: none"> • good construction practice is followed; and • appropriate controls are secured, for example through a robust Construction Environmental Management Plan or equivalent method statement. 	<p>receptors. The measures include restricted working hours and prior notification to residents of the likely affected properties (which will include information on the nature and duration of works). The embedded measures also include the use of best practice in accordance with the applicable standard. These measures, including confined working hours and, where necessary, the procedure of notification to local council for any out-of-hours works, have been outlined in the oCEMP [APP/7.6.2], which will be implemented as part of the detailed Construction Environmental Management Plan and secured as a DCO requirement. The Applicant therefore welcomes the confirmation from the Council that a detailed noise assessment is not required.</p>
BC6	<p>ExQ1 Q16.0.4</p> <p>The Council notes the Applicant's proposed approach to managing waste during the decommissioning phase, including the preparation of a Decommissioning Waste Management Strategy.</p> <p>The Council defers to Norfolk County Council in its role as Waste Planning Authority in relation to the technical adequacy of the proposed mitigation measures.</p> <p>From a planning perspective, the Council considers the following to be material considerations:</p> <ul style="list-style-type: none"> • the cumulative impacts arising from the decommissioning of multiple large scale schemes; and • the potential pressures on waste management capacity. <p>The Council therefore considers that a coordinated approach to decommissioning across multiple NSIPs is likely to be necessary.</p>	<p>The Applicant makes note of this comment and acknowledges that all matters relating to waste management have been now agreed with Norfolk County Council in the relevant Statement of Common Ground, being SoCG with Norfolk County Council [REP1-019].</p> <p>Measures to ensure the appropriate handling of cumulative waste impacts arising from the decommissioning of multiple large scale schemes will be secured through the oDS [REP1-058].</p>
<p>Norfolk County Council [REP1-095]- Response to ExA written questions</p>		
NCC1	<p>Q5.0.8 Possible impediments</p> <p>NCC has identified a significant number of parcels of land which may be, in part, controlled by NCC either as Highways land or as part of the Norfolk County Farms Estate. Unfortunately, at the time of writing, NCC has not yet been able to clearly establish the exact areas of NCC land that will be effects and remains unclear on the specific land arrangements for those different parcels of land. NCC has requested a meeting with the applicant to resolve these uncertainties so that a clear and certain response can be provided to the examining authority. However, this meeting has not been able to be arranged between the date on which the examiners questions were issued and the EXQ1</p>	<p>The Applicant notes this response and remains engaged to support NCC to clarify any uncertainties. The Applicant looks forward to meeting NCC with regards to this matter.</p>



Reference	Comments	Applicant's Response
	deadline. NCC will provide further comments on these specific points once the current uncertainty has been resolved.	
NCC2	<p>Q5.0.9 Highway land and interests</p> <p>NCC has identified a significant number of parcels of land which may be, in part, controlled by NCC either as Highways land or as part of the Norfolk County Farms Estate. Unfortunately, at the time of writing, NCC has not yet been able to clearly establish the exact areas of NCC land that will be effects and remains unclear on the specific land arrangements for those different parcels of land. NCC has requested a meeting with the applicant to resolve these uncertainties so that a clear and certain response can be provided to the examining authority. However, this meeting has not been able to be arranged between the date on which the examiners questions were issued and the EXQ1 deadline. NCC will provide further comments on these specific points once the current uncertainty has been resolved.</p>	The Applicant refers to its response to NCC1 in the row above.
NCC3	<p>Q7.2.1 Article 9 (Application of the permit scheme)</p> <p>9.2(a) and 9.4. Indicates NCC unable to refuse the applicant a Street Works permit to open the highway after substantial Highway works (surfacing etc), under NRSWA Section 58. Project highway works unlikely to require significant carriageway incursion. No concerns at this stage.</p>	The Applicant is grateful for the confirmation that the NCC has no concerns at this stage regarding the drafting of Article 9 of the draft DCO [APP/3.1.2] .
NCC4	<p>Q7.2.3 Article 10 (Power to alter layout, etc., of streets)</p> <p>Outside the RLB limits, any temporary alteration works to identified streets, to expedite the scheme must be agreed prior with the local HA and SA, and prescribed within the oCTMP, and CoCP. Statement must be made by the applicant concerning removal of these works post contract.</p> <p>NCC would also recommend that the street works in schedule 5 should also be subject to NCC consent, unless other protective provisions or relevant highways agreement is put in place. This could be achieved by amending Article 10 (4) to refer to paragraphs (1) and (2).</p>	The Applicant notes that this matter was raised by NCC in its Local Impact Report [REP1-094] . The Applicant has, therefore, fully addressed this matter in its response to NCC68 in the Applicant's Response to Local Impact Reports [APP/8.12] .
NCC5	<p>Q7.5.6 R18 - Skills, supply chain and employment</p> <p>NCC welcomes the inclusion of a draft Requirement to secure the preparation of an Employment, Skills and Supply Chain Strategy (ESSCS) prior to commencement. The Requirement appropriately provides for approval by NCC, in consultation with the County Council's Skills and Employment Team, and ensures the detailed ESSCS is prepared in accordance with the Outline Strategy.</p> <p>It will be important that the detailed ESSCS includes clear targets, delivery arrangements and monitoring mechanisms, and that it is developed in continued engagement with the County Council to ensure alignment with local labour market priorities and the Council's Employment and Skills Framework.</p>	The Applicant welcomes NCC's confirmation that it is content with Requirement 18 of the draft DCO [APP/3.1.2] , and agrees with NCC regarding the inclusion of matters in the detailed Employment, Skills and Supply Chain Strategy (which must be substantially in accordance with the oESSCS [APP-195]).
NCC6	<p>Q10.0.9 Decommissioning of Underground Cables</p> <p>Removal of both cable and piles is one of the factors we believe contribute to making impacts on below-ground of both installation and removal of panels and cables more than negligible. A suitable level of pre-construction archaeological mitigation will be required in panel areas.</p>	<p>Direct impacts to below ground archaeology was scoped out of the ES pursuant to ES Appendix 2.2: Scoping Opinion Response [APP-134] (ID 3.3.2). This was due to the fact that any such impacts would have already been mitigation prior to the construction phase.</p> <p>It is agreed that pre-construction mitigation will be required and this is laid out in ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] which was formulated in consultation with NCC.</p>



Reference	Comments	Applicant's Response
NCC7	<p>Q14.0.4 Proposed new permissive routes Yes. However, NCC consider it important to secure these beyond the timescale of the development.</p>	<p>The oPRoWPPMP [APP-192], secured in full by Requirement 16 of Schedule 2 of the draft DCO [APP/3.1.2], will manage how any temporary closures or restrictions of public rights of way take effect. Part 5 of Requirement 16 currently states that the permission for the public to make use of any permissive path listed within the final approved version of the oPRoWPPMP [APP-192] ceases on the date of decommissioning for that part of the authorised development. Paragraph 2.1.4 of the oDS [REP1-058] sets out how post-decommissioning, the landowners would choose how the land is to be used and managed. Permissive paths would be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to NCC.</p>
NCC8	<p>Q15.0.6 Cumulative traffic using the A1065 Yes, NCC are happy that the effects are unlikely to be significant based on the information currently available. As per my previous correspondence, continued coordination between High Grove Solar, your team and the Highway Authority will be essential as both applications progress.</p>	<p>The Applicant welcomes NCC's agreement that there are unlikely to be any significant cumulative effects associated with construction traffic.</p>
NCC9	<p>Q16.0.4 Mitigation for cumulative effects from waste in the decommissioning stage NCC, as the Waste Planning Authority for Norfolk, notes the additional mitigation described, including the Decommissioning Waste Management Strategy and we have no further comments or concerns to raise regarding the proposed mitigation measures for the effects from waste, including the cumulative effects during the decommissioning stage.</p>	<p>The Applicant welcomes this comment.</p>



3. The Applicant's responses to Prescribed Bodies

Reference	Comments	Applicant's Response
Environment Agency - Written Submission Regarding Comments in ISH1 [REP1-087]		
EA1-1	<p>Page 1, Paras. 2 – 4</p> <p>Within our relevant representation (AS-062/RR-021), we raised concerns regarding the accuracy of the hydrogeological model. In summary, our key issue was that the low resolution of the hydrogeological model may contradict other lines of Evidence. The implication of this is that interactions with groundwater may not be fully understood. We advised that the Applicant could submit an Environmental Information Request to the Environment Agency, to check for any other hydrology monitoring stations within the Study Area and the Environment Agency's North East Anglia Chalk model. Both approaches would help to inform and check the Applicant's hydrogeological site conceptual model.</p> <p>During the Issue Specific Hearing 1 (07 May 2026), the project team stated that they had reviewed the North East Anglia Chalk model, and considered it to be less conservative than their current hydrogeological site conceptual model.</p>	<p>The Applicant submitted an Environmental Information Request to the Environment Agency and updated the triangulated groundwater elevation to incorporate data from the Brink Hill monitoring station and river controls, thereby increasing spatial coverage and robustness of the dataset. ES Chapter 12: Water Resources [APP/6.2.1] has been updated at Deadline 2 to reflect these revisions. A Technical Information Note has also been prepared for Deadline 2 (see Technical Information Note - Groundwater Elevation Methodology [APP/8.14]) to compare the conceptual model present in the ES (2025, prior to Deadline 2) with outputs from the revised triangulated groundwater elevation and NEAC model.</p> <p>In addition, ES Chapter 12: Water Resources [APP/6.2.1] has been updated at Deadline 2 to include outputs from the NEAC model, which have informed the assessment of groundwater</p> <p>Comparative analysis with the NEAC model outputs confirms that the conceptual model presented in the ES (2025, prior to Deadline 2) is more conservative than the NEAC model, consistent with the Applicant's statement at Issue Specific Hearing 1 (7 May 2026). Following the inclusion of additional monitoring station data and river controls, the revised triangulated groundwater elevation is marginally less conservative than the NEAC model outputs but remains broadly consistent in its representation of groundwater levels.</p> <p>The incorporation of additional monitoring data and the comparison with an independent regional model provides cross-validation of the hydrogeological conceptual model, improving confidence in its resolution and its ability to represent groundwater conditions accurately.</p> <p>While the model has been refined and validated using additional data and independent modelling, the overall conclusions of the ES remain unchanged and are considered robust.</p>
EA1-2	<p>Pages 1 and 2, Para. 5</p> <p>Following Issue Specific Hearing 1, in correspondence with the Applicant, we have requested that the Applicant produces a technical note summarising their review of groundwater model data provided by the Environment Agency and any implications for their hydrogeological model for the Proposed Development. The Applicant proposed to update Chapter 12: Water Resources at Deadline 2 to compare the North East Anglia Chalk model results (wet day) with the groundwater elevations derived for the triangulation analysis used in the Environmental Statement. We found this approach acceptable, and look forward to reviewing the updated document.</p>	<p>The Applicant has updated ES Chapter 12: Water Resources [APP/6.2.1] at Deadline 2, summarising the review of NEAC groundwater model data obtained from the Environment Agency. ES Chapter 12: Water Resources [APP/6.2.1] has been updated at Deadline 2 to include a comparison between NEAC model outputs (wet day scenario) and groundwater elevations derived from the triangulated groundwater elevation analysis presented in the ES.</p> <p>The comparison demonstrates broad consistency between datasets and provides additional validation of the triangulated groundwater elevation.</p>
EA1-3	<p>Page 2, Para. 2</p> <p>In the absence of site-specific data, even if the Applicant can demonstrate that their own model is more conservative than the North East Anglia Chalk Model, uncertainties will remain which would have to be addressed by post-consent monitoring and design mitigation as required. We will seek assurance via appropriate commitments, secured under the Development Consent Order, that the Applicant will carry out sufficient ground investigation and monitoring post-consent. This should ensure that they are able to suitably refine their ground model and mitigate any risks should groundwater rest levels be shallower than anticipated.</p>	<p>Table 7 Water Resources of the oCEMP [APP/7.6.2] (a document which, in turn, is secured via a DCO requirement) secures groundwater monitoring for six months prior to construction, to include the winter months and for the construction period to ensure that activities do not occur when groundwater is high enough to interact with the activity.</p>



Reference	Comments	Applicant's Response
National Grid Electricity Transmission plc – Written Representation [REP1-090]		
NGET1	<p>Summary of Written Representation (Paras 1-7)</p> <p>1. NGET owns assets that form an essential part of the electricity transmission network in England and Wales either within, or in close proximity to, the Droves Project.</p> <p>2. The Droves Project proposes to construct a new substation to be operated by NGET (New Substation). The Droves Project currently holds a connection offer from NESO reflecting the need for the Applicant to identify a site for the New Substation and planning consent to authorise it. NGET understand that the Droves Project has now been notified by NESO that it will receive a Gate 1 offer under the Connections Reform process which, once offers are finalised, will result in the point of connection in the DCO application becoming an indicative option only.</p> <p>3. NGET does not in principle object to the Project or to the inclusion of the New Substation within the Order Limits, however, equally NGET is not in a position (and will not be in a position for during the course of the Examination or prior to the Secretary of State decision on the Order application) to confirm whether it can support the design, sizing or location of the New Substation due to the status and nature of the Project's connection offer.</p> <p>4. The wider regulatory and commercial context needs to be fully considered and worked through which may result in the point of connection being located elsewhere.</p> <p>5. In light of this, NGET require protective provisions to be included within the Order to ensure that its existing and future assets and interests are adequately protected, as well as to ensure compliance with relevant safety standards. NGET's preferred form of protective provisions (the NGET Protective Provisions) include safeguarding wording in relation to future infrastructure that was secured in the recently granted DCOs.</p> <p>6. NGET's solicitors (Addleshaw Goddard LLP) have been engaging with the Promoter's solicitors in relation to the agreement of the NGET Protective Provisions.</p> <p>7. Until satisfactory agreement has been reached with the Promoter, NGET must continue to reserve the right to make further submissions to the examination and attend hearings at a later date.</p>	<p>The Applicant notes NGET's helpful summary of its written representation and provides detailed comments in rows NGET2 to NGET13 following (including in relation to paragraph 4).</p> <p>The Applicant agrees with paragraphs 1 and 2 of NGET's written representation.</p> <p>In response to paragraph 3, the Applicant welcomes the fact that <i>"NGET does not in principle object to the Project or to the inclusion of the New Substation within the Order Limits."</i></p> <p>In response to paragraphs 5 and 6, the Applicant agrees with NGET that protective provisions for its benefit should be included in the draft DCO [APP/3.1.2]. From the outset of the DCO Application, the Applicant has included a form of such protective provisions in Part 3 of Schedule 15.</p> <p>Having since met with NGET and its solicitors, the Applicant notes NGET's request for these protective provisions to be updated. The Applicant notes that NGET's preferred form of these protective provisions was included at Appendix 1 of NGET's Written Representation [REP1-090] and is also grateful to NGET's solicitors for sending these directly to the Applicant for comment.</p> <p>The Applicant is in the process of reviewing the updates to the protective provisions requested by NGET and is, as NGET rightly points out, engaging with NGET's solicitors to agree the form of these. The Applicant is confident that such agreement (and then inclusion of the agreed form in the draft DCO [APP/3.1.2]) will be secured during the course of the examination.</p> <p>In response to paragraph 7, the Applicant notes that <i>"Until satisfactory agreement has been reached with the Promoter, NGET must continue to reserve the right to make further submissions to the examination and attend hearings at a later date"</i>. The Applicant agrees with this statement.</p>
NGET2	<p>1. Introduction</p> <p>1.1 This written representation is submitted on behalf of National Grid Electricity Transmission plc (NGET) in response to the application by The Droves Solar Farm Limited (Applicant) for The Droves Solar Farm Development Consent Order (Order) to enable the construction of the Droves Solar Farm (Droves Project).</p> <p>1.2 In summary of NGET's position, NGET considers that it has existing and potential future infrastructure that needs to be protected via the protective provisions that NGET is proposing be included in the final form of the Order. These protective provisions include wording that has precedent in other development consent orders that have been recently granted. Without inclusion of the protective provisions, serious detriment would be caused to NGET's undertaking as well as to other third-party projects that are reliant on NGET's existing and future infrastructure including the Droves Project itself.</p> <p>2. NGET infrastructure</p> <p>Existing infrastructure</p>	<p>The Applicant notes these paragraphs and agrees with the chronology presented by NGET in paragraphs 2.3 to 2.5. The Applicant has responded to the point regarding Connections Reform in the corresponding rows below.</p> <p>In response to paragraph 1.2, the Applicant refers to its response to NGET1 above on the matter of protective provisions.</p>



Reference	Comments	Applicant's Response
	<p>2.1 As set out in NGET's relevant representation dated 26 February 2026 [RR-036], NGET owns assets that form an essential part of the electricity transmission network in England and Wales either within, or in close proximity to, the Droves Project.</p> <p>Future infrastructure</p> <p>2.2 The Droves Project comprises the construction, operation and maintenance and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development, including a battery energy storage system (BESS), a customer substation, and grid connection infrastructure, including a new substation proposed to be operated by NGET (New Substation).</p> <p>2.3 Prior to the pre-application stage, discussions regarding the potential to connect into Kings Lynn substation took place where Island Green Power (IGP), parent company of the Applicant, was advised by NGET to apply for, and subsequently connect, directly onto the overhead line (OHL) running between the Walpole and Necton substations.</p> <p>2.4 During the pre-application stage, the Applicant was advised by NGET to identify a site for a new substation for the Project, alongside obtaining land rights and planning consent for this.</p> <p>2.5 A connection offer from the National Energy Systems Operator (NESO) was made reflecting this requirement identifying the connection of the Project to the OHL via a new 400kV substation, referred to as the 'New Swaffham 400kV Substation' (i.e. the New Substation). Appendix J ("Construction Programme") of the construction agreement contained within the grid connection offer states that the Applicant must apply for planning consent by 30 March 2027 and inform NGET of the location of the substation by 28 February 2028. However, for the reasons explained below, these requirements reflected a point in time which did not account for the Connections Reform process which has subsequently taken place/is taking place.</p>	
<p>NGET3</p>	<p>2.6 Whilst NGET remains committed to constructive engagement with the Applicant as the Project develops, it wishes to ensure that the Examining Authority is aware of NGET's position regarding the Project's proposed means of connecting to the national grid. In summary, NGET does not in principle object to the Project or to the inclusion of the New Substation within the Order Limits, however, equally NGET is not in a position (and will not be in a position for some time) to confirm whether it can support the design, sizing or location of the New Substation due to the status and nature of the Project's connection offer.</p> <p>2.7 As such, for the avoidance of doubt, should the Applicant receive consent for the New Substation as part of the Order, this does not trigger or constitute any obligation for NGET to accommodate any connection to the national grid at such a substation for the reasons set out below. The wider regulatory and commercial context needs to be fully considered and worked through which may result in the point of connection being located elsewhere.</p>	<p>In response to paragraph 2.6, the Applicant welcomes the fact that <i>"NGET does not in principle object to the Project or to the inclusion of the New Substation within the Order Limits."</i></p> <p>Further, it is well understood by the Applicant that on notification of re-prioritisation of Gate 1, NGET would pause its work on this project. This is explained in NESO's guidance, available at https://www.neso.energy/industry-information/connections-reform/gate-1-information, which states that:</p> <p><i>"Receiving a Gate 1 notification means your project can remain in the connections process, but ... the relevant Transmission Owner for your project will stop progressing any applicable transmission works where those works are no longer required ... This applies to all Gate 1 projects and reflects the requirements of the reformed connections process"</i></p> <p>In response to paragraph 2.7, it is well understood by the Applicant that receiving development consent for the National Grid Substation as part of the Order does not trigger or constitute any obligation for NGET to accommodate any connection to the national grid at such a substation. NESO's guidance (as above) states that:</p> <p><i>"To progress, customers must submit a Gate 2 application during an application window and meet the prescribed evidence requirements to be eligible for a place in the connections queue"</i></p> <p>The Applicant is developing the Scheme with the aim (if consent is secured) of applying again to move into Gate 2 in a future connection prioritisation round. Receiving consent ensures a higher priority in future rounds of Gate windows as set out in NESO's Gate 2 Criteria Methodology (March 2026). On securing a Gate 2 agreement, the location of the Point of Connection, and connection date, would become firm. The latest proposed methodology for the next prioritisation round was</p>



Reference	Comments	Applicant's Response
		<p>published in a consultation document by NESO on 17 March 2026. The proposal is to give priority for projects that have submitted or received planning consent over those that have not. Should the proposed methodology be adopted, the current planning application for the Scheme therefore leads to a higher priority for moving to Gate 2 in the next round. In response to NGET's statement that future work "may result in the point of connection being located elsewhere" the Applicant accepts this as a theoretical possibility but notes that no suitable and alternative available points of connection currently exist (or are in development in the public domain such that those alternatives may be progressed instead or alongside the Scheme's proposals). The Applicant also refers to its Response to Section 89(3) Letter dated 17 March 2026 [AS-063] and the Written Summary of the Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071] (specifically Agenda Item 3.2) for its full position on the matter of the National Grid Substation potentially being sited elsewhere. Further, the Applicant notes that NGET state an alternative location as a possibility, but not a requirement, should the Scheme secure a Gate 2 connection.</p>
NGET4	<p>3. Connection Reform and nature of the Project's connection offer</p> <p>Connections Reform</p> <p>3.1 NGET considers it necessary to provide further background to the NESO Connections Reform queue formation and gate assessment process, which provides the justification for NGET's position regarding the New Substation.</p> <p>3.2 The Connections Reform process (also known as the TMO4+ reforms) is intended to address the connection delays arising from the traditional 'first come, first served' model and achieve the goals set out in the Government's Clean Power 2030 Action Plan.</p> <p>3.3 Under this process, NESO will assess proposed connection projects and make connection offers through a gated process following periodic application windows, named "Gate 1" or "Gate 2". This will apply to projects that are already in the connections queue as well as new projects applying to connect. To secure a place in the queue, applicants must meet certain Gate 2 criteria. Those that are unable to satisfy the Gate 2 criteria, may be eligible for a Gate 1 connection offer, which serves to provide only indicative connection details.</p>	<p>The Applicant notes these comments and welcomes NGET's representation and the clarity it brings.</p>
NGET5	<p>3.4 The Gate 2 criteria are made up of two elements being:</p> <p>(a) Gate 2 Readiness Criteria (a project must be 'Ready') – demonstrated by project acquiring appropriate land rights or going through the Development Consent Order process.</p> <p>(b) Gate 2 Strategic Alignment Criteria (a project must be 'Needed') – for most projects, the primary way to satisfy this criteria will be through alignment with the generation technology capacities set out in the CP30 Action Plan. Some projects may satisfy the Strategic Alignment Criteria through other means, including qualifying for protections as a project that is currently being progressed.</p>	<p>The Applicant notes that the Scheme has satisfied the Gate 2 Readiness Criteria (sub-paragraph (a)).</p> <p>In relation to sub-paragraph (b), the Applicant notes that no protections apply to the Scheme.</p> <p>However, the Applicant would note that Government is clear that the Clean Power Plan and Connections Reform is not about stopping projects, but it is about prioritising projects for 2030, while maintaining a robust pipeline of projects beyond 2030. Projects which continue to demonstrate they are 'ready' are expected to be re-prioritised, especially as Government continues to refine its criteria for 'strategic alignment'. It is also anticipated that some projects currently in the queue may drop out. Section 2.9 of the Statement of Need [APP-042] provides further information on the Applicant's understanding that current policy position confirms that the need established by NPS EN-1 continues to apply to any scheme or component of a scheme which currently has a Gate 1 connection agreement.</p> <p>Further, Planning for New Energy Infrastructure (the government's consultation response to the new Energy NPSs, available online at https://assets.publishing.service.gov.uk/media/69121170bda892e068aa6454/nps-revisions-2025-consultation-government-response.pdf) explains that "Clean Power 2030 is not a fixed ceiling on technology deployment or project approvals". The current designated Overarching National Policy Statement for energy (EN-1) 2025, which is both an important and relevant consideration for this</p>



Reference	Comments	Applicant's Response
		examination, clarifies at paragraph 3.2.6 that it is not the Government's intention that project consents should be limited by the Clean Power 2030 capacity ranges or NESO's prioritisation, i.e. the "figures or targets" contained in the NPS.
NGET6	<p>3.5 In terms of the nature of the Gate 1 and the Gate 2 offers:</p> <p>(a) Gate 1 offers (indicative)– for new applicants and existing customers. Projects that are either not 'ready' or not 'needed' would have their existing agreement varied and be provided with a conditional offer, with only an indicative connection date and location. They would need to reapply in future application period when they can show they are 'ready' and 'needed' to be granted a confirmed Gate 2 offer.</p> <p>(b) Gate 2 offers (with confirmed details, i.e. connection date and location)– for new applicants and existing customers. Projects that meet the Readiness and Strategic Alignment criteria (including all those that are protected), will be offered a Gate 2 contract or, in the case of existing customers, will maintain a position in the queue or advance to fill new gaps from the removal of non-ready projects from the queue.</p>	Following on from response NGET5 , the Applicant therefore agrees with NGET's sub-paragraph (a) that the assessment of 'need' is a time-based assessment which may change in the future; and it is critically important to differentiate between this assessment and the absolute need for an unprecedented capacity of new low carbon generation technologies needed to come forwards to meet Net Zero, as is established in the NPSs.
NGET7	<p>3.6 Prior to the implementation of the final arrangements, NESO undertakes a one-off exercise known as the 'Gate 2 to Whole Queue' (G2TWQ) process which will assess which projects that currently hold connection offers meet the Gate 2 eligibility criteria. Following the G2TWQ process, affected projects will be issued with a Gate 2 offer or a Gate 1 offer. Certain projects may fall within specified exceptions or 'protections' and will be treated as satisfying the Strategic Alignment Criteria. This process is currently underway and there are timelines for the circulation of Gate 1 and Gate 2 offers available on the NESO website.</p> <p>Nature of the Project's connection offer</p> <p>3.7 As at the date of this Written Representation, it is NGET's understanding that the Applicant has been notified by NESO that it will receive a Gate 1 connection offer. NGET has also received confirmation from NESO that such notification has been issued to the Applicant. Once the Gate 1 offer is formally issued, the existing connection agreement between NESO and the Applicant will be superseded, and the agreement between NESO and NGET (in relation to the Applicant's connection) will be terminated.</p>	<p>The Applicant welcomes NGET's representation on this topic. The Applicant also notes Ofgem's recent publication (available online at https://www.ofgem.gov.uk/sites/default/files/2026-06/OFGEM-E12.14-decision-letter-FINAL.pdf) which explains that Gate 2 offers as part of the G2TWQ process are now timetabled to be issued no later than 31 March 2027, and that "Gate 1 connection offers will mostly be issued within the same period." The Applicant notes that there is therefore no commitment to timelines for issuing Gate 1 agreements, but considers it likely (due to NESO and NGET's need to prioritise other schemes such as this which are not co-located with any Gate 2 elements, may be 'last cab in the rank' to be issued (see also the Applicant's response to paragraph 3.9 in row NGET9 below).</p> <p>Until a revised agreement is confirmed between NESO and the Applicant, the Applicant's position is that it currently has a binding grid connection agreement. The Applicant is aware that its agreement will change. However, when that agreement will change, or what it will change to, is not yet known. The agreement may change before the end of the Examination period, but it may not.</p> <p>In response to paragraph 3.7, the Applicant confirms that it has received notification from NESO that the Scheme has been reprioritised as a Gate 1 project. However, for clarity, the Applicant confirms that as of the date of submission of this response, the Applicant has not received that Gate 1 offer.</p>
NGET8	<p>3.8 The Gate 1 offer from NESO to the Applicant will no longer contain the provision referred to in paragraph 2.5 above that the Applicant must secure land and consents for a new substation. This provision was based on engagement between the Applicant and NGET that preceded the Connection Reform process by several years. This process now needs to be taken into account and worked through. As a result, the identified point of connection in the DCO application will become an indicative option only rather than an agreed point of connection. A Gate 1 offer also does not trigger a commitment by NGET to deliver or take responsibility for operation of a substation of the design, size and location of the New Substation.</p>	<p>In relation to paragraph 3.8, the Applicant agrees that on signing a Gate 1 agreement the location and timing of the grid connection point would become indicative only with no commitment conferred on NGET at that point.</p> <p>However, the Applicant notes that in the event that the Scheme is consented and later secures a Gate 2 agreement, there are at present no clear plans that the Applicant is aware of which suggest that the Scheme could connect to the NETS <u>other than through the substation it is proposing as part of the Scheme</u>. This is because:</p> <p>(a) no expansion works at Swaffham have relieved or are planned to relieve the current connection congestion (which meant that the Applicant was required to find and consent its own substation); and</p> <p>(b) no other new substations have either been built or have been submitted for planning consent in the local area which could serve as an alternative to the Scheme's proposals.</p> <p>By including the National Grid Substation as part of the Scheme, the Applicant is compliant with paragraph 4.11.12 of NPS EN-1, which states that "The Secretary of State should be satisfied that</p>



Reference	Comments	Applicant's Response
		<p><i>appropriate network connection arrangements are/will be in place for a given project regardless of whether one or multiple (linked) applications are submitted</i>". This is because the Scheme will, if consented, include consented plans for a substation which may constitute an appropriate network connection; and to suggest otherwise would be to suggest that a Gate 1 connection re-prioritisation is a barrier to consent, which the government has confirmed is not (see the Applicant's response to row NGET5 above).</p>
NGET9	<p>3.9 In accordance with the regulatory process set out under STCP 18-8 (System Operator – Transmission Owner Code Procedure)¹, NGET is required to prioritise Gate 2 offers, which are identified as both ready and needed. Consequently, NGET cannot consider the detailed aspects of applications for projects holding only Gate 1 offers.</p> <p>3.10 In addition, those customers with Gate 2 offers will, in part, influence the final size, design and location of the final point of connection solution. Until those Gate 2 offers have been finalised, NGET cannot confirm what that solution will be but must always act in accordance with its statutory duties to provide a economic and efficient connection network.</p> <p>3.11 As such, NGET will not be able to provide confirmation of the size, design and/or location of any substation into which the Project would connect and accordingly confirmation as to whether the proposals included in the DCO application are satisfactory and/or would be built out during the course of the Examination or prior to the decision of the Secretary of State.</p> <p>3.12 NGET consider that the Applicant's notification of its Gate 1 offer represents an early step in the process of connecting the Project to the national grid. Progression to a binding connection agreement with NESO and any associated infrastructure delivery will be subject to further steps. These include receipt of a Gate 2 offer in the future, commercial negotiations with the Applicant, having regard to any other customer requirements, detailed technical and siting assessments and relevant planning processes and approvals.</p>	<p>The Applicant notes and agrees with paragraphs 3.9 to 3.12, including NGET's requirement to prioritise Gate 2 offers over projects holding only Gate 1 offers, which the Applicant considers is a key reason for statements made by NGET as discussed in rows NGET3 and NGET7.</p>
NGET10	<p>3.13 NGET notes that in the Applicant's Response to section 89(3) letter dated 17 March 2026 [AS 063], the Applicant has states that similar discussions have been had in the examination of other recent development consent orders where the connection works have been consented separately. Whilst NGET does not comment on the approaches taken in these individual cases, NGET notes that these development consent orders were examined prior to the Connections Reform process and therefore the context was materially different from what is taking place here. Those approaches need to be considered accordingly and the current environment needs to be taken into account when considering the Project.</p>	<p>The Applicant notes that the Connections Reform process was introduced to the sector in or prior to the publication of the Connections Action Plan, published in November 2023, and that a key element of that plan was the re-prioritisation of the connections queue. (Section 2.7 of the Statement of Need [APP-042] provides further information).</p> <p>The Applicant therefore respectfully disagrees with NGET that <i>"the examination of other recent development consent orders where the connection works have been consented separately ... were examined prior to the Connections Reform process and therefore the context was materially different from what is taking place here"</i> and considers that the examination of certain recent made DCOs is relevant for the ExA to consider in his examination of the Scheme.</p>
NGET11	<p>Page 7, Para. 4.1</p> <p>NGET has an obligation under section 9(2) of the Electricity Act to develop and maintain an efficient, co-ordinated and economical system of electricity transmission. NGET must therefore have regard to the need in the area as dictated by the status of the offers from NESO and offer an economic and efficient solution for all customers. In order to align with this obligation, it is likely that that the point of connection for the Project will also facilitate the connection of other customers. There is therefore the potential that significant infrastructure will be delivered within the same area and within similar timescales albeit not necessary to the same location, size or specification proposed in the Applicant's DCO application for the reasons set out above. As such, there needs to be careful co-ordination and consultation undertaken between NGET and the Applicant to ensure that as</p>	<p>The Applicant refers to its response to NGET3 above on the matter of protective provisions.</p>



Reference	Comments	Applicant's Response
	<p>connection offers are formalised and the scope of infrastructure to be delivered becomes clear, each connectee project (including the Project) can be delivered without unduly interfering with other connectee projects. This is provided for in the form of protective provisions that NGET is seeking to include in the Order (NGET Protective Provisions).</p>	
<p>NGET12</p>	<p>Pages 7 and 8, Paras. 4.2 – 4.6</p> <p>In light of the issues outlined above and the need to facilitate multiple connectee projects, NGET require protective provisions to be included within the Order to ensure that its existing and future assets and interests are adequately protected, as well as to ensure compliance with relevant safety standards.</p> <p>NGET seeks to secure protective provisions broadly in line with those that were included in the Awel y Môr Offshore Wind Farm Development Consent Order, the Mona Offshore Wind Farm Development Consent Order and the Dogger Bank South Offshore Wind Farm Development Consent Order. These provisions are also being sought in the Morgan and Morecambe Offshore Wind Farm Transmissions Assets DCO and the Outer Dowsing Offshore Wind DCO.</p> <p>The protective provisions secured under the DCOs referred to above included safeguarding provisions as per paragraphs 3 to 7 of NGET's Protective Provisions, along with associated amendments to other standard protective provisions to ensure that they apply to the future NGET works/apparatus/land, e.g. the protective provisions concerning the acquisition of NGET's land by the Applicant in paragraph 11 of NGET's Protective Provisions. Without appropriate amendments, these protective provisions would not apply to third party land required for future point of connection works. The NGET Protective Provisions have been updated to reflect that the details of the point of connection are as yet unknown, rather than referring to a specific extension or new substation construction project. This is referred to as the 'NGET Project'.</p> <p>Without specific safeguarding provisions for NGET's future upgrade projects, the protective provisions currently included in the draft Order only relate to existing NGET apparatus and land and so there is nothing to prevent the Droves Project from adversely affecting the NGET Project as set out above to the serious detriment of NGET's undertaking and connectee projects.</p> <p>As such, NGET considers that it is reasonable and appropriate for the safeguards and protections secured for NGET's benefit in the DCOs referred to above to be included in this Order.</p> <p><i>A copy of NGET Protective Provisions are provided for at Appendix 1 to the submission.</i></p>	<p>The Applicant refers to its response to NGET3 above on the matter of protective provisions.</p>
<p>NGET13</p>	<p>Page 8, Paras. 5.1 – 5.3</p> <p>NGET's solicitors (Addleshaw Goddard LLP) have been engaging with the Applicant's solicitors in relation to the issues highlighted in this Written Representation and a copy of the NGET Protective Provisions has been provided to them for consideration. NGET and the Applicant will continue to engage to seek to reach an agreed position during the course of the Examination and will provide regular updates to the Examining Authority in this regard.</p> <p>For the reasons set out above, NGET considers that it is necessary for the NGET Protective Provisions to be included in the Order and will continue to make robust submissions throughout the Examination until this principle is agreed and the wording is included within the Order.</p>	<p>The Applicant refers to its response to NGET3 above on the matter of protective provisions.</p>



Reference	Comments	Applicant's Response
	<p>Until satisfactory agreement has been reached with the Applicant, NGET must continue to reserve the right to make further submissions to the examination and attend hearings at a later date.</p>	
<p>Natural England – Written Representation [REP1-093]</p>		
NE1-1	<p>Page 1, Ongoing engagement between Natural England & the Applicant:</p> <p>The Applicant has engaged with Natural England since submission of our Relevant Representations on the Applicant's draft Statement of Common Ground (SoCG) which is expected to be submitted at Deadline 1. This SoCG should clearly set out both where Natural England and the Applicant have agreed matters, and where matters remain under discussion. Natural England will continue to work with the Applicant to update the SoCG throughout the Examination.</p> <p>Included within the SoCG, Natural England has included our estimation as to the likelihood that disagreement will remain by the end of the examination ('Low', 'Medium' and 'High').</p>	<p>The Applicant welcomes this comment.</p>
NE1-2	<p>Page 1, Conservation Designations</p> <p>Natural England has highlighted to the applicant that standard advice in relation to air quality impacts on designated sites remains applicable. This standard advice is Natural England's formal statutory advice. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on proposals with potential air pollution impacts. An overall conclusion regarding impacts on statutory protected sites must take into account this standard advice.</p>	<p>A full assessment of direct and indirect effects on designated sites, priority habitats and priority species, has been undertaken within section 7.8 of ES Chapter 7: Ecology and Biodiversity [REP1-034], including considerations with regard to air quality. The assessment has taken into account the associated mitigation and design measures proposed, for example habitat and faunal buffers, pollution prevention measures, and transport route design, in order to avoid significant harm to designations, priority habitats and priority species and ensure the proposals result in negligible, not significant effects.</p>
NE1-3	<p>Page 2, Soils</p> <p>Natural England has advised the applicant that we welcome the principle of securing a detailed Soil Management Plan through the Development Consent Order. However, Natural England's position remains that the outline information is currently high-level and does not yet provide sufficient detail to demonstrate that soils, particularly Best and Most Versatile land, can be adequately protected, reinstated and monitored.</p>	<p>The Applicant notes Natural England's concerns in relation to the oSMP [REP1-062] and is considering updates to this document at a future deadline, which will likely require discussion with Natural England.</p>
NE1-4	<p>Page 2, Soils</p> <p>Natural England has raised the need for further evidence to demonstrate that the Agricultural Land Classification survey provides full coverage of the site (including associated infrastructure), that the assessment of effects adequately reflects both permanent and longer-term impacts to soils, and that the proposed approach to soil handling and reinstatement is sufficient to avoid permanent degradation where restoration is relied upon.</p>	<p>The ALC of the Order limits has been surveyed in full, except for the area east of the A1065. In that area, restringing of the overhead line is proposed, which is a short-term temporary activity which will not result in any disturbance to soil or land quality, and ALC surveys are not therefore necessary.</p>
NE1-5	<p>Page 2, Protected Species</p> <p>The Applicant has indicated that protected species licences are not anticipated at this stage, despite the Environmental Statement identifying the presence of protected species within the Order Limits.</p> <p>Natural England has advised that the need for licensing should be kept under review as protected species are dynamic and further surveys may be required prior to construction to confirm baseline conditions. We have also highlighted to the Applicant that the retention</p>	<p>The existing Badger setts are fully retained and subject to appropriate buffers. Badgers within the Site are habituated to occasional ground disturbance within close vicinity to their setts through ploughing given the current agricultural use (which will no longer take place under the Scheme). Buffers of 20m around outlier setts are in line with statutory guidance from Natural England (Badgers and Development. A Guide to Best Practice and Licensing. December 2011) and as such are considered appropriate.</p> <p>The Applicant is in agreement that further surveys would be required prior to construction to confirm baseline conditions, as set out within ES Chapter 7: Ecology and Biodiversity [REP1-034].</p>



Reference	Comments	Applicant's Response
	<p>of badger setts may not necessarily remove the need for licensing where works have the potential to disturb badgers occupying a sett or affect habitat relied upon by the species.</p>	
NE1-6	<p>Page 2, Protected Species</p> <p>Natural England also notes that other Relevant Representations identify evidence of previous stone curlew (<i>Burhinus oedicephalus</i>) within the project area, and that this species may therefore be a relevant ecological consideration. The proposed order limits are approximately 5km from Breckland SPA at their nearest point. Should further surveys find Stone Curlew nests within the proposed order limits, Natural England would not consider these nests to be part of the SPA population. However, consideration of stone curlew as a protected species may still be required if there is historical evidence of stone curlew nesting in the area.</p> <p>As previously advised in Natural England's response to the Targeted Section 42 Consultation (our ref [redacted], dated 19 September 2025), the full species name, Eurasian curlew (<i>Numenius arquata</i>), or stone curlew (<i>Burhinus oedicephalus</i>) should be used to avoid any confusion when referencing these species.</p>	<p>The Applicant welcomes confirmation from Natural England that any future use of the Site by Stone-curlew would not be considered part of the SPA population and therefore would not affect the conclusions of the Shadow Habitats Regulations Assessment [AS-057] in this regard.</p> <p>The Applicant is in agreement that Stone-curlew is a protected species under Section 1 of the Wildlife and Countryside Act 1981 (in line with all wild bird species), such that any intentional or reckless killing, injury, taking, damage or destruction of nests, obstruction or prevention of access to nests or damage or destruction of eggs would represent an offence. In addition, Stone-curlew is listed on Schedule 1 of that Act (in line with a number of bird species), such that it is also protected from disturbance whilst building a nest, in or near a nest containing eggs or young, or disturbance of dependent young. In line with other bird species, mitigation measures (including timing of works) are set out in the oCEMP [APP/7.6.2], which itself is secured under Requirement 13 of Schedule 2 of the draft DCO [APP/3.1.2].</p> <p>The Applicant is in agreement that the use of the full terms Eurasian Curlew <i>Numenius arquata</i>, or Stone-curlew <i>Burhinus oedicephalus</i> will be used to avoid any confusion when referencing these species.</p>
NE1-7	<p>Page 2, Outline Landscape and Ecological Management Plan</p> <p>Natural England welcomes the Applicant's commitment to update the Outline Landscape and Ecological Management Plan, including to reflect the published Norfolk Local Nature Recovery Strategy at Deadline 1.</p> <p>However, Natural England's position remains that the document is currently high-level and does not yet provide sufficient detail to give confidence in the delivery of proposed mitigation, enhancement and biodiversity net gain outcomes. In particular, further detail is required regarding how habitats will be established and managed, the success criteria that will be applied, the monitoring framework, and the mechanisms for implementing remedial action where required.</p>	<p>The mitigation measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.2], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.2] and the oLEMP [REP1-060].</p> <p>As outlined in paragraphs 7.1.3 and 7.1.4, the oLEMP [REP1-060] clarifies that "while as much detail has been included in this oLEMP as practicable to accompany the Development Consent Order (DCO) application, it is anticipated that it shall be revised and finalised following the DCO examination process and receipt of consent. In some cases, in this report, options are set out in order to leave some flexibility in specification, but all achieve the same ecological goals." In addition, "a detailed version of the LEMP (detailed LEMP) will be produced prior to the commencement of construction and will be secured through the DCO. The detailed LEMP must be substantially in accordance with this outline LEMP and will be approved by the relevant planning authority pursuant to the relevant requirement in the draft DCO."</p> <p>At this stage, mitigation measures have included the enhancement of existing landscape features within the Order limits. With regard to enhancement of the landscape, the mitigation measures include:</p> <ul style="list-style-type: none"> • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRow and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [REP1-060]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to



Reference	Comments	Applicant's Response
		<p>screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings; and</p> <ul style="list-style-type: none"> • New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site. <p>Quantifiable habitat performance indicators are already provided by the provided by the habitat condition criteria set out within The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology (Defra, 2025), with the targeted habitat and condition set out within the Biodiversity Net Gain Assessment Report [REP1-048] and associated metric. Similarly trigger points requiring corrective action in regard to habitats would be represented by failure to reach the required condition.</p> <p>The oLEMP sets out the framework for what will need to be set out in detail in the dLEMP – Natural England will be consulted as part of the discharge of requirements to ensure that sufficient detail is included within the dLEMPs to satisfy the matters they have raised.</p>
NE1-8	<p>Pages 2 and 3, Biodiversity Net Gain</p> <p>Natural England welcomes the demonstration of biodiversity net gain and notes that a minimum of 10% biodiversity net gain in habitat and hedgerow units is proposed to be secured through the Development Consent Order.</p> <p>Natural England notes the Applicant's position that on-site drainage features do not meet the definition of a watercourse ditch (which typically includes features that are less than 5 metres in width and retain water for at least 4 months of the year). Natural England has advised that, where it can be demonstrated with sufficient evidence that such features do not meet the relevant definition in the Statutory Biodiversity Metric User Guide, Natural England would have no objection in principle to their exclusion. However, in the absence of such evidence, Natural England's position remains that these features should be appropriately considered within the biodiversity net gain calculation.</p>	<p>The Applicant welcomes confirmation from Natural England that there would be no objection to the exclusion of the ditches subject to evidence that they do not meet the definition of watercourse ditch. In this regard, as set out at ES Figure 12.1: Ephemeral Ditches [APP-115] and within ES Chapter 12: Water Resources [APP/6.2.1], ephemeral ditches are present, which have been persistently dry (paragraph 12.6.67). A small number of ditches (predominantly associated with hedgerows) were recorded during the ecological survey work (as set out within ES Appendix 7.2: Baseline Ecological Survey Report [APP-148]), however these were recorded to remain dry during the survey work undertaken and, as such, whilst in line with their function they likely carry flows of water during high rainfall, none of the ditches within the Site were recorded to be of sufficient size, nor hold water for sufficient time, to qualify under the definition of a watercourse ditch set out within The Statutory Biodiversity Metric – User Guide (Defra, 2025). Accordingly, they have not been included within the Biodiversity Net Gain Assessment Report [REP1-048].</p>
<p>Historic England – Written Representation [REP1-088]</p>		
HE1	<p>Page 3, Para. 3</p> <p>Following our advice on the PIER, we welcome the amendments which have reduced the impact of the scheme on the designated heritage assets at Castle Acre. These amendments comprise:</p> <ul style="list-style-type: none"> • the relocation of the substations and Battery Energy Storage System from the northern edge of the development, fields 33 and 35, to the south of Bartholemew's Hill Plantation and • the setting back of the solar arrays from northern half of field 33. 	<p>The Applicant welcomes this comment.</p>
HE2	<p>Page 3, Paras. 4 - 7</p> <p>However, parts of the proposal would still be visible from the Castle and Priory, both of which lie within the Conservation Area. Much of the impact would be from the doubling effect created by the overhead line proposed under Scenario A.</p>	<p>The impacts of the Scheme are presented within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets due to the lack of shared experience between the plateau land and the heritage assets, which is a prerequisite for contribution to significance.</p>



Reference	Comments	Applicant's Response
	<p>The impact of the development would detract from the rural landscape which contributes to the significance of these assets and result in moderate level of harm (less than substantial harm) to the significance of the scheduled monuments and harm of a lower level to the conservation area.</p> <p>Historic England considers this a significant effect to the highly designated heritage assets in Castle Acre which equates to harm in planning policy terms. We accept the harm cannot be wholly avoided but in Environmental Impact Assessment terms these effects could be partly mitigated through Scenario B. Historic England therefore strongly supports Scenario B.</p> <p>We would like the applicant to commit to this option to address the harm to the significance of these designated heritage assets.</p>	<p>In terms of the scales of impact as defined in ES Chapter 8: Cultural Heritage and Archaeology [APP-057], in order to be a moderate impact there would need to be considerable harm to a heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost. This is a relatively high level of impact which is not reflected by the Scheme, which would retain the village siting, the visual and spatial connection between the assets, the connection to the Peddars Way and the vast majority of the surrounding landscape visible from the heritage assets. The majority of views will be unchanged, with only very small elements of the wider Scheme (at least partially screened under the proposals) remaining.</p> <p>As such, it is not considered that the small visible areas of the Solar PV Site would dominate or intrude into such views, but would be visible. Whilst the visibility of Solar PV Arrays would represent a change in the setting of the Castle, they would not alter any appreciation of the topographic siting of the castle and the vast majority of any vista from the Castle would remain in agricultural use, and it is for these reasons the impact from visible Solar PV Arrays is considered to be negligible.</p> <p>In terms of the additional pylons, the Applicant's preference is also Scenario B, but the Applicant cannot commit (at this stage) to which scenario will be taken forward. This confirmation will come at detailed design stage. Details of the Applicants reasoning for retaining flexibility at this stage is presented in Q9.0.1 in Applicant's Response to ExQ1 [REP1-069].</p> <p>Under either scenario, the pylons would be visible in views that already contain existing pylons but not to a degree that they may draw the observer's eye away from elements contained in the wider vista that add to the appreciation of the castle's significance. Under Scenario B, however, whilst there may be more pylons present than is currently the case they would be located further away from the Castle, reducing their prominence in the landscape.</p> <p>The Applicant is satisfied that the levels of harm identified within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] (Scenario A – Minor, Scenario B – Neutral) are robust and justifiable.</p>
HE3	<p>Page 4, Para. 1.4.</p> <p>The proposed development would be within the setting of a range of highly designated heritage receptors, including listed buildings, conservation areas, and scheduled monuments. It would impact on the historic environment and we consider this is significant in relation to some of the heritage receptors and in relation to EIA policy.</p>	<p>The Applicant is satisfied that the levels of harm identified within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are robust and justifiable. With the exception of archaeological remains within the area of the proposed Customer Substation, National Grid Substation and BESS, no significant (in EIA terms) impacts have been identified.</p>
HE4	<p>Page 5, Para. 1.9</p> <p>We confirm the ES is broadly adequate for the purposes of the examination. The baseline and assessment are set out in the accompanying ES chapters. It was agreed during the scoping process that a detailed assessment of the impact of the proposal upon the historic environment would be required, and this is provided here.</p>	<p>The Applicant welcomes this comment.</p>
HE5	<p>Page 5, Para. 1.10</p> <p>We are pleased to see the inclusion of an Outline Archaeological Mitigation Strategy in this DCO application (Appendix 8.7). This contains provisions to produce a post-consent WSI and detailed mitigation. We have provided comments on the proposed measures and suggested revisions where appropriate. We would expect that outline strategies will be agreed and amended with Historic England prior to being adopted.</p>	<p>The Applicant acknowledges this comment.</p> <p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been updated at Deadline 2 to include reference to consultation with Historic England at each stage of production of WSIs/Detailed Project Designs.</p>
HE6	<p>Page 5, Para. 1.11</p> <p>We also recommend the wording of the draft DCO requirement is revised before the end of the examination. The revised requirement should include additional provision for</p>	<p>The Applicant will review this request and discuss with Historic England, though it is hoped that agreement on these matters can be reached via the SoCG with Historic England [REP1-021].</p>



Reference	Comments	Applicant's Response
	<p>Historic England's involvement in approval of the mitigation and enhancement measures. The Examination Authority will also need to be satisfied that the requirements are sufficient to mitigate the negative impacts of the proposal on the historic environment.</p>	
HE7	<p>Pages 5 and 6, Para. 2.2 and 2.4</p> <p>Our primary consideration is the impact of the proposal on the significance of highly designated heritage assets comprising scheduled monuments, grade I and grade II* listed buildings, and conservation areas. As set out above, the focus of our advice is on the highly designated heritage assets at Castle Acre.</p> <p>We have only provided text on a selection of assets where we feel comment would add value to the examination and/or where we have specific issues of concern or recommendations.</p>	<p>The Applicant acknowledges this comment and has responded to the matters raised in the corresponding rows.</p>
HE8	<p>Page 6, Paras. 2.5 and 2.6</p> <p>The Cultural Heritage and Archaeology assessment follows the general approach to undertaking EIA using a matrix, modified to cover the full range of heritage assets, magnitude of impact and scale of effect. The assessment methodology notes that professional judgement will be used alongside the matrix (8.5.6, 8.5.8 and 8.5.16).</p> <p>We support the matrix approach when used alongside professional judgement. This enables a more nuanced assessment than a matrix sometimes allows for, particularly in considering significance and levels of harm. In particular it can help with articulating levels of harm to assist when weighing this against public benefits as required by paragraph 5.9.33 of the Overarching National Policy Statement for Energy (EN- 1).</p>	<p>The Applicant welcomes this comment.</p>
HE9	<p>Page 6, Paras. 2.7 – 2.10</p> <p>There are two areas in the assessment where we consider the matrix approach places limits on the applicant's assessment. This could be overcome if modified by professional judgement in the assessment.</p> <p>The first is the sensitivity of receptor table (Table 8.1) which ranks conservation areas as medium (regional) sensitivity. This will be a reasonable ranking for many conservation areas. However, although we did not raise this in the initial assessment at the PEIR stage, on further reflection the sensitivity of Castle Acre Conservation Area could be considered to be high (national).</p> <p>The second is the criteria for determining magnitude of impact (Table 8.2) which ranks the impacts but does not provide a nuanced approach to assessing less than substantial harm in relation to the impact on setting. As less than substantial harm is a broad category into which most cases resulting in harm will fall, a more nuanced approach to considering this would be helpful.</p> <p>A low adverse impact is defined as, 'Some harm to the heritage asset's setting, but not to a degree that it would materially compromise the significance of the heritage asset. Perceivable level of harm, but insubstantial relative to the overall interest of the heritage asset.'</p> <p>A medium adverse impact is defined as, 'Considerable harm to a heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost.'</p>	<p>With regards to the identification of the sensitivity of Castle Acre Conservation Area (CACA) as medium within ES Chapter 8: Cultural Heritage and Archaeology [APP-057], the Applicant notes that no objections to this level of sensitivity were raised by Historic England, or any other consultee, at Scoping or PEIR stages. The PEIR report was submitted along with PEIR Appendix 8.6: Stage 1 and Stage 2 Setting Assessment and the assessment of significance within that report is the same as that presented in ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]. There has been no additional information provided that could be considered to increase the significance of CACA since the reports were produced.</p> <p>The identification of CACA as being of medium significance is based upon professional judgement. With each ranking of sensitivity, there will be a range of significance from assets that would only just fall within the range to those which are at the upper end of the range. As an example, the High sensitivity category includes assets at both Grade II* and Grade I, which are clearly not regarded as of equal importance/significance. CACA would clearly lie within the upper range of the medium sensitivity category; however, whilst the CACA contains a number of high-grade assets it also contains many lower grade assets along with buildings and areas of no or very little historic interest. Conservation Areas are designated at a local level by the Local Planning Authority (occasionally at county level by the County Council), rather than at a national level. Decisions on planning applications are undertaken by the Local Planning Authority, with Historic England only consulted upon applications that comprise more than 1000 square meters (as opposed to planning applications which affect a Grade I or II* asset, where Historic England are automatically consulted). The NPPF in paragraph 213 differentiates between designated heritage assets and assets of the highest significance. In relation to assets of the highest significance protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites are mentioned, but notably not Conservation Areas. It is not considered</p>



Reference	Comments	Applicant's Response
		<p>that, when taken as a whole, the CACA is of equivalent significance to a Grade II* listed building (which would fall within the high sensitivity category). It is for these reasons that the CACA has been assessed as of medium sensitivity.</p> <p>In terms of assessing levels of less than substantial harm, it has been established by the courts that substantial harm is a high test, as an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced (Bedford Borough Council v Secretary of State for Communities and Local Government and Nuon UK Limited [2013] EWHC 4344 (Admin)). It stands to reason, therefore, that less than substantial harm covers a very broad spectrum indeed. To be towards the upper end of that spectrum would require something approaching substantial harm and even to fall within the middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element.</p> <p>As laid out in table 8.2 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057], a high magnitude impact would equate to substantial harm, with all other magnitudes equating to less than substantial harm. There is no defined method for expressing where on the scale of less than substantial harm an impact is believed to lie, although it is often expressed using the terms 'at the upper end, in the middle, at the lower end', and variations thereof. Whilst the tables used for EIA do present some constraint of fully expressing this harm, the use of professional judgement can be used to add nuance in identifying level i.e. low/medium, medium/high, with negligible/low being right at the lower end of the scale and medium/high at the upper.</p>
HE10	<p>Page 7, Paras. 2.14 and 2.15</p> <p>The setting contributes to the significance of the Castle. It occupies a strategic position on the northern slope of the River Nar valley overlooking the Peddars Way crossing point of the river (which at that time was navigable). (...)</p> <p>The Castle commands views across the surrounding countryside, especially from the elevated position on the mound. These show how it was designed to dominate and control the surrounding area. While the village has expanded to the north, there are extensive views from the north east to the south west along the Nar valley.</p> <p>Despite changes in agricultural practices over the centuries, the setting beyond the village remains an essentially rural landscape. This contributes to the aesthetic character of the castle and conveys the context in which the Castle has stood for almost 1000 years.</p> <p>The main intrusion into these rural views are the overhead power lines and wind turbines which are visible on the skyline in the distance to the south. These contrast with the otherwise largely rural landscape.</p>	<p>This statement largely concurs with that laid out within ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057], although the rural context of the village should not be taken as meaning that the landscape and the methods of its use have remained unchanged for 1000 years. Whilst much of the surrounding landscape remains in agricultural use, it does not appear as it would have in the medieval period when the open field system would have been practiced. The enclosure of the open fields (reaching its peak in the 18th century) represents one of the biggest changes to the English agricultural landscape in history and radically transformed the appearance of the landscape. The 18th and 19th centuries also saw an increase in plantations to provide cover for game birds, which is particularly evident within and in the vicinity of the Order limits. The bulk of the Order limits are also unlikely to have been used as arable land in the medieval period but would more likely have formed summer pasture/grazing land. The almost complete lack of medieval artefacts recovered during the trenching (ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160]) suggests that the area was not being intensively manured in the period and was, therefore, unlikely to have formed arable land as it does today. The medieval rural countryside was also not purely agricultural but would also have been exploited for various industries such as charcoal burning and mineral extraction, albeit at a small scale. The landscape today is distinctly modern, farmed by modern agricultural practices and containing many modern elements such as the road networks, pylons, wind turbines, large chicken sheds, and pig rearing facilities. Therefore, whilst it is accepted that it remains a largely agricultural landscape, the landscape is not unchanged from the medieval period.</p>
HE11	<p>Page 7, Para. 2.16</p> <p>There is much useful analysis of the significance of the Castle within the Cultural Heritage chapter of the ES, but we consider the rural setting provides a greater contribution to significance than the assessment of 'some contribution' (8.6.9).</p>	<p>The assessment of the setting of the castle is presented in detail in ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] and is summarised in ES Chapter 8: Cultural Heritage and Archaeology [APP-057].</p> <p>As laid out in <i>Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment</i> (Historic England 2008) the importance of setting is in what it adds to</p>



Reference	Comments	Applicant's Response
	<p>The comment that 'it would still hold a high level of significance if removed from its setting' (8.6.10) rather downplays the importance of the setting of designated heritage assets which is clearly set out in the EN-1 9.9.3.6 and the National Planning Policy Framework (NPPF) 213.</p>	<p>significance, i.e. the 'experience' that leads to understanding and appreciation of the asset. Contextual aspects of 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. It is for this reason that the east-west axis between Castle Acre Priory and Castle is considered to be the most important aspect of the monuments setting.</p> <p>The east-west axis, which links the castle, settlement, church and priory, provides the most context to the monuments and is, therefore, considered to be the key element of setting of both the castle and priory. Whilst visual appreciation of this element is somewhat restricted from the monuments which bookend the village, particularly in summer months when trees are in leaf, the importance of setting is not confined to visual considerations. As expressed within setting guidance (Historic England 2017) '<i>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.</i>' This is certainly the case with both the Castle and Priory, which had an intimate relationship with each other and the village between; indeed, the scheduled portion of the Castle also includes the town defences which enclose the core of the historic settlement.</p> <p>In terms of the wider settings of the Castle and Priory, the contribution of setting to significance is not uniform for both assets, as each has distinct aspects. In terms of the Castle, the views to the south are recognised as important in terms of illustrating the topographic importance of the castle to its strategic defensive position overlooking a crossing point of the Nar (ES Chapter 8: Cultural Heritage and Archaeology [APP-057]). However, as individual elements which would provide context to the strategic position, such as the roads, are difficult to discern in these views, and the landscape is essentially one of 18th/19th century character, the contribution to significance is considered less than that provided by the east-west axis of contemporary monuments.</p> <p>The Priory was never reliant on strategic defensive positioning, but rather was more closely linked to the river valley with the Nar providing a transport route as well as a focus for religious communities along its length, again enhancing the east-west aspect of setting for the Priory.</p> <p>It is accepted within the assessment that views of the surrounding countryside from both the Castle and Priory do make some contribution to the significance of the monuments, through aiding the aesthetic of the monument in addition to understanding topographic considerations for its siting; however, such aesthetics are considered secondary to contextual setting. Furthermore, the question arises over whether it is the heritage interest that is being appreciated in such views or if it is the landscape itself that is being appreciated, albeit from a historic vantage point. Setting guidance expresses caution when ascribing significance to views, stating '<i>views, however, can of course be valued for reasons other than their contribution to heritage significance. They may, for example, be related to the appreciation of the wider landscape, where there may be little or no association with heritage assets</i>' Historic England 2017.</p> <p>Both ES Chapter 8: Cultural Heritage and Archaeology [APP-057] and ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] are clear that the topographic location of the Castle and Priory in relation to the river valley, which includes elements to the east and west along with elements to the south, contribute to the significance of the monuments. 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, they sit behind the major approaches to Castle Acre, and they do not facilitate meaningful views of the monuments). In terms of any aesthetic contribution, the visible parts of the Order limits only form a small part of much wider vistas, and are located at the extremity of such views with expanses of countryside between the Order limits and the monuments. As such, it is clear that the Order limits only form a small part of the views that add to the aesthetic appreciation of the monuments.</p>



Reference	Comments	Applicant's Response
		<p>The comment on the asset retaining a high level of significance is not downplaying the importance of setting, but rather is emphasising the fact that when assessing significance of heritage assets the contribution of setting cannot be taken in isolation, but rather is focussed on what setting adds to the significance of the asset as a whole. This is emphasised by 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 both from its physical presence and its setting”. When assessing the significance of each monument as a whole, it is 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, although still considerable, is secondary to the physical remains.</p>
HE12	<p>Page 8, Paras. 2.17 – 2.20</p> <p>The wireline (Figure 6.12) and photomontages (Figure 6.14) viewpoint 14 show two areas of panels would be visible just below the horizon from the earthworks around the outer bailey. They may also be visible from some of the other raised areas within the inner and outer bailey. These are two modest areas of panels set between wooded areas and seen as part of more expansive views.</p> <p>The overhead lines have a greater visibility than the proposed panels given their height and how they puncture the skyline. Under Scenario A which is illustrated as the worst-case scenario, the combined effect of the existing and new overhead powerlines would increase the prominence of these across the skyline towards the south, with c.3 additional pylons. Under Scenario B additional pylons might be visible but at a greater distance and therefore would have less impact.</p> <p>Under Scenario A this would result in a moderate level of harm to the significance of the Castle and a moderate scale of effect, but at the lower end of this, and that we consider to be significant in EIA terms.</p> <p>We therefore consider the level of harm to be higher than the low/negligible magnitude of impact identified in the applicant's assessment. We also consider the effect to be higher than the conclusion of a minor adverse effect which in the assessment is not significant in EIA terms (8.8.38).</p> <p>The harm would be reduced to a low level under Scenario B. We conclude this would be a little higher than the applicant's assessment of negligible, resulting in a Neutral effect, which is not significant.</p>	<p>The description of how elements of the Scheme will be visible concurs with that described in ES Chapter 8: Cultural Heritage and Archaeology [APP-057]; however, the Applicant does not agree with the level of harm proposed by Historic England.</p> <p>As discussed above in relation to comment HE9, a medium magnitude impact would be towards the upper middle range of the less than substantial harm spectrum, which would require a large loss of significance of the effected asset. This is clearly not the case - the Applicant notes that it is prudent to not focus upon a single aspect of the assets setting; rather, the significance of the asset as a whole should be considered, including both the physical remains and all the other elements of setting that contribute to significance.</p> <p>It should be noted that, whilst the two small areas of panels will represent a change in ground cover discernible as part of a wider vista, these are the only areas that would represent a loss of agricultural land in views from the monument with large expanses of agricultural land remaining as the main focus in these views (and many other views from the monument that do not encompass parts of the Order limits). The Applicant is, therefore, content that identified negligible impact presented in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] for solar panels is robust and justifiable.</p> <p>The introduction of the pylons will not result in the loss of views of agricultural land from the monument, but will be an additional, clearly modern, element within those views. The presence of the pylons will not affect the ability to appreciate and understand the topographic reasoning for the siting of the Castle, the relationship of the Castle with the village and the Priory, nor will they be visible in all views of the agricultural landscape to or from the Castle. Given that the vast majority of the aspects that make up the significance of Castle Acre Castle as a whole (including the physical remains and all aspects of setting) will not be impacted, the Applicant is content that identified low/negligible (Scenario A) or negligible (Scenario B) impact presented in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] for solar panels is robust and justifiable.</p>
HE13	<p>Page 9, Paras. 2.25 – 2.27</p> <p>The setting of the [Castle Acre] Priory contributes to its significance. It occupies a typical position for these houses, in the valley bottom of the River Nar with the protection of a nearby castle. The surrounding rural landscape contributes to the picturesque aesthetic characteristics of the ruined monastic complex. From the high ground on the northern side of the precinct there are more extensive views across the wider landscape.</p> <p>As with the Castle, the main intrusions into the rural setting are the overhead power lines and wind turbines which are visible on the skyline. The Priory is closer to these than the Castle, and here they detract more from the rural setting. They are particularly visible</p>	<p>The Applicant respectfully considers that the phraseology used by Historic England in describing intrusion into ‘rural’ setting is potentially misleading. It could be said that these elements detract from the aesthetic appreciation of the setting, but not from the rurality of that setting. Whilst features such as pylons and wind turbines are not historic features in a rural context, pylons and turbines are a relatively common feature of the modern rural landscape (they are rarely found in urban contexts). This is not to say that they are an aesthetically pleasing element of rural landscapes, or that they cannot detract from historic integrity, but they are a part of the modern rural landscape.</p> <p>It should be noted that, whilst the two small areas of panels will represent a change in ground cover discernible as part of a wider vista from limited areas of the monument, these are the only areas that would represent a loss of agricultural land in views from the monument with large expanses of agricultural land remaining as the main focus in these views (and many other views from the</p>



Reference	Comments	Applicant's Response
	<p>from the higher ground to the north, but are also seen from the heart of the priory, for example close to the west end of the church and from the windows of the Prior's Lodgings.</p> <p>The wireline (Figure 6.12) and photomontage (Figure 6.14) viewpoint 12 show there would be views of two areas of panels between the trees in fields on the horizon from the north east corner of the Priory precinct. These are relatively modest areas of panels seen between planting and within broader landscape views.</p>	<p>monument that do not encompass parts of the Order limits). The Applicant is, therefore, content that identified negligible impact presented in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] for solar panels is robust and justifiable.</p>
HE14	<p>Page 9, Paras. 2.28 – 2.31</p> <p>From within the <i>[Castle Acre]</i> Priory complex, near the west end of the church and from the windows of the Prior's lodgings smaller glimpses of the panels maybe visible. These have not been modelled but given the position lower in the valley these are likely to be less visible from here.</p> <p>Under Scenario A the overhead line would bring c.7 new pylons with a particular cluster at the point in the line closest to the Priory, numbering c.4. These would be particularly prominent as they puncture the skyline and the close grouping increases their visibility.</p> <p>The pylons would be most visible from the high ground in the north east corner of the precinct but sections of the line are also visible from around the heart of the priory complex. There are views from the west end of the church and Prior's Lodgings and the Lodging windows on the first floor. The views are of a shorter section of line but include the area where the new pylons would form a cluster. There are some views from within the cloister of the existing pylons, although just of the upper section.</p> <p>The proposals would result in a moderate level of harm and scale of effect, higher than that to the Castle because of the closer proximity of the line, and we consider this to be significant in EIA terms. Again we assess this to be higher than that identified in the applicant's assessment. We do not agree that the impact would be of a low/negligible magnitude resulting in a minor adverse impact as set out in the assessment (8.8.42).</p> <p>Under scenario B the harm would be reduced to a lower level as the pylons would be located further away.</p>	<p>As detailed within ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] and ES Chapter 8: Cultural Heritage and Archaeology [APP-057], the topographic relationship between the Site and the Priory is such that visibility of solar panels will not be available from the lower lying parts of the Priory, including the church and Priors lodgings.</p> <p>The visibility of the pylons from the north-eastern corner of the precinct is not in question and is illustrated in ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme (Part B) [AS-041]. There are areas within the priory complex where pylons are currently visible and where the additional pylons would also be visible. This visibility is, however, at a distance, and is not constant as changes in location within the complex result in differing screening, either from the historic ruins themselves or tree cover and topography, and form small parts of much wider vistas where pylons do not form part of the view.</p> <p>In terms of visibility from the first floor windows of the Prior's Lodgings, it should be noted that there are only two windows facing the south within the building. Views from the eastern of these two windows are largely obscured by standing remains of the priory, although it is possible to see the tops of some pylons in oblique views, although these are not the principal focus provided by the window. The western of the two windows has a slightly less obstructed view and it is likely that additional pylons would be visible from this window (albeit only really discernable at close quarters due to the windows being lead paned).</p> <p>The introduction of the pylons will not result in the loss of views of agricultural land from the monument, but will be an additional, clearly modern, element within those views. The additional pylons will not be present in every view from the monument and, whilst still present in some of the views that add to the aesthetic appreciation, will lie behind those element that make that contribution where existing pylons are already visible.</p> <p>The presence of the additional pylons will not affect the ability to appreciate and understand the topographic reasoning for the siting of the Castle, the relationship of the priory with the village and the Castle, nor will they be visible in all views of the agricultural landscape to or from the Priory. Given that the vast majority of the aspects that make up the significance of Castle Acre Priory as a whole (including the physical remains and all aspects of setting) will not be impacted, the Applicant is content that identified low/negligible (Scenario A) or negligible (Scenario B) impact presented in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] for solar panels is robust and justifiable.</p>
HE15	<p>Pages 9 and 10, Paras. 2.34 and 2.35</p> <p>In view of this, we consider this particular conservation area <i>[Castle Acre Conservation Area]</i> should be of 'high/national sensitivity' given the outstanding significance of the Castle, Priory and planned Norman town and the way these scheduled monuments 'contribute significantly to Castle Acre's outstanding conservation area' (Conservation Area Character Statement overview 0.1). The matrix assessment places it at medium sensitivity (table 8.1).</p> <p>The many of the views from the conservation area are those associated with the Castle and Priory which have been described above. Given the contribution these sites make to</p>	<p>As discussed above in relation to HE9, the Applicant does not agree that CACA should be regarded as of high sensitivity, and the assessment of medium sensitivity presented in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] (and previously in the PEIR) is, in the Applicant's view, robust and justifiable.</p> <p>In terms of impact, Historic England have not identified what level of harm they believe would arise to the conservation area, only that it would not be negligible as described in ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The reason for attributing negligible harm within the ES is due to the fact that, whilst the Priory and Castle are included in the conservation area, when experiencing views from these assets it is primarily the individual asset that is being experienced</p>



Reference	Comments	Applicant's Response
	<p>the significance of the conservation area and the impact of the proposals on this, we consider there would be some harm the significance of the conservation area in Scenario A. We do not agree this would be negligible as set out in the assessment (8.8.66).</p>	<p>rather than the conservation area. It is, again, the case that the significance of the asset as a whole should be assessed, rather than a particular element, and as the significance of the conservation area differs to that of either the Castle or Priory in isolation it stands to reason that any impact would also differ. The conservation area as a whole is more inward-looking than either the Castle or Priory. Where elements of the Scheme will be visible from the conservation area, they will not remove the agricultural setting, be located at a considerable distance within a landscape that already contains modern elements (including existing pylons) and are not considered to present any material impact to the significance of the asset.</p>
HE16	<p>Pages 10 and 11, Paras. 2.38 – 2.40</p> <p>The southern end of the avenue lies close to the development site where the panels would be positioned. The views of the development have not been assessed from the registered landscape itself.</p> <p>However, the assessment notes that the solar panels may be visible from the avenue. If this is the case, this would erode the rural setting which contributes to the character of Narford Hall as a country house within a designed landscape in a rural setting.</p> <p>This would result in some harm of a low level to the registered landscape and the Hall.</p>	<p>As shown in Figure 16 of ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152], it is possible that a small section of panels within Field 3 may be visible from parts of the Registered Park. As is made clear in policy and guidance, however, mere visibility does not necessarily equate to harm. The avenue, being the only part of the registered park from where potential visibility of the Scheme has been identified, is a linear feature purposefully designed to frame and channel views between the Hall and a classical arch, which was subsequently replaced by Eyetrapp Plantation (whose name also suggests that it was designed to be a focal point). Any visibility of panels from the avenue would, therefore, be at oblique angles, partial and filtered, not a part of any key views and only available from a relatively short section towards the southern end of the avenue. Such visibility would only represent a very minor change to the assets setting and would not materially harm the asset's significance; therefore, the assessment of negligible impact is justified.</p> <p>The suggestion by Historic England that any harm to the Registered Park (the existence of which is refuted) would automatically extend to the Hall (which shares no intervisibility with the Site) is also refuted. The Registered Park forms a part of the setting of the Hall, but the setting of the Hall cannot be taken to extend to the setting of the park as this would constitute the setting of setting.</p>
HE17	<p>Page 11, Paras. 2.41 and 2.42</p> <p>Viewpoint 8 is taken from the road a little further to the west of the sites. While the panels would be visible in these views, they would be some distance from the monument [<i>Palgrave deserted medieval village</i>]. We concur with the assessment that the harm to the significance of the monument would be negligible (8.8.60).</p>	<p>The Applicant welcomes this comment.</p>
HE18	<p>Page 11, Para. 2.43</p> <p>The medieval church of St. George lies to the south of South Acre Road. The church yard is well planted and we concur with the applicant's assessment that Scenario A would have a low impact on its significant. Scenario B would reduce the harm further.</p>	<p>The Applicant welcomes this comment.</p>
HE19	<p>Pages 11 and 12, Paras. 3.2 - 3.5</p> <p>Table 5-1 outlines the Scheme Parameters for different elements and includes details of the below ground impacts. For example, the solar panels would be secured via metal posts driven or screwed into the ground to a depth of up to 4m or anchored using concrete feet. Any below-ground archaeology present in these areas would be impacted by the proposed development.</p> <p>Some elements of the scheme would require foundations, such as the Integrated Conversion Units, the Standalone Conversion Units, the Customer Substation, the National Grid Substation, the BESS. This may relate to a concrete slab or plinth and the use of aggregate layers. This work would require excavation, which could impact below ground archaeology present in these areas (Table 5-1).</p>	<p>All potential below ground impacts upon the archaeological resource will be mitigated in accordance with ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1].</p> <p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been updated at Deadline 2 to include reference to the Historic England publication 'Piling and Archaeology' and incorporate appropriately into any mitigation strategy required.</p>



Reference	Comments	Applicant's Response
	<p>It is stated in Table 5-1 that the Customer Substation, National Grid Substation and the BESS may also utilise piled foundations up to 15m in depth. We would recommend that the Historic England document 'Piling and Archaeology' (2019) is referred to and the impact that the piles may have on archaeological remains and deposits is considered: https://historicengland.org.uk/images-books/publications/piling-and-archaeology/.</p> <p>Table 5-1 outlines the below ground impact of the cable corridors, both in terms of the open-trench and HDD installation approaches. The open cut trenches could have a below ground impact of up to 2m, and the HDD could reach an assumed maximum depth of 15m below ground level. Both of the installation approaches have the potential to impact buried archaeological remains and this would need to be considered as part of the proposed development.</p>	
HE20	<p>Page 12, Para. 3.6</p> <p>5.3.6 states that the metal mounting frames would be pile driven or screw mounted into the ground to a maximum depth of 4m. We would recommend that the Historic England document 'Piling and Archaeology' (2019) is referred to and the impact that the piles may have on archaeological remains and deposits is considered: https://historicengland.org.uk/images-books/publications/piling-and-archaeology/.</p>	<p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been updated at Deadline 2 to include reference to the Historic England publication 'Piling and Archaeology' and incorporate appropriately into any mitigation strategy required.</p>
HE21	<p>Page 12, Para. 3.7</p> <p>5.3.51 states that horizontal directional drilling may be required to install cables in parts of the proposed scheme area. We would recommend that the potential impacts of issues such as bentonite slurry outbreak on archaeological remains is considered. For example, bentonite slurry outbreak could result in physical damage to archaeological remains or it could result in a change in the conditions of an archaeological site that may result in the degradation of fragile remains.</p>	<p>The use of Horizontal Directional Drilling (HDD), particularly for cabling, will be at sufficient depth to avoid any direct impacts to archaeological remains. However, the drilling fluid used during HDD, bentonite, has the potential to affect preservation levels of archaeological remains if there is an outbreak. The Applicant has made a commitment to a HDD break out fluid plan in Table 7 Water Resources of the, outline CEMP [APP/7.6.2], which would mitigate the risk should a break out occur and it is not considered that bentonite poses any significant risk to below ground archaeological remains. There are no known examples of bentonite outbreak impacting archaeological remains. The Historic England Pile Impacts on Archaeology: Literature Review (2018) states that <i>no record of cases [of bentonite migration] were reported in the literature review</i>. Further, a report on 'Mitigation of Construction Impacts on Archaeology' (2004) undertaken by Museum of London Archaeology on behalf of Historic England (then English Heritage) stated that bentonite is often a preferred choice as it is designed not to permeate the surrounding ground, and further notes that the pH level of bentonite is similar to that of water, preventing the chance of acidifying effects on soil.</p>
HE22	<p>Page 12, Para. 3.8</p> <p>5.3.53 summarises the installation of joint bays that will link sections of underground cables. It is noted that the joint bays would be approximately 10m long, 6m wide and approximately 3m deep. The installation of these elements could therefore impact any below ground heritage located in these areas.</p>	<p>All potential below ground impacts upon the archaeological resource will be mitigated in accordance with ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1].</p>
HE23	<p>Page 12, Para. 3.9</p> <p>5.3.75 proposes new planting as part of the ecological mitigation works. This could include the creation of new woodland blocks and new tree planting. It should be noted that the choice of species of plants/trees should be carefully considered, as roots can impact buried archaeological remains. For example, the Oxford Archaeology report 'Assessing the Impact of Tree Roots on Archaeology' (2024) highlights how the root structures of different tree species could impact archaeological remains: https://knowledge.oxfordarchaeology.com/library/12564.</p>	<p>All potential below ground impacts upon the archaeological resource will be mitigated in accordance with ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1]. Whether mitigation involves specifying tree species or further archaeological investigation remains to be considered following the completion of post consent archaeological evaluation.</p>



Reference	Comments	Applicant's Response
HE24	<p>Page 12, Para. 3.10</p> <p>5.4.5 summarises the installation of the new pylons that are proposed, but information is needed about the foundations and therefore the potential impact to buried archaeological remains.</p>	<p>The Applicant has responded to this matter within Applicant's Response to Relevant Representations [REP1-067], please refer to HE9 within that document for further information.</p>
HE25	<p>Page 12, Para. 3.12</p> <p>Chapter 8 includes a reference to the Regional Research Framework for the East of England but refers to an older version. The latest version was released in 2021 and can be found online: https://researchframeworks.org/eoe/.</p>	<p>The 2021 version of the regional research framework was consulted in the production of ES Chapter 8: Cultural Heritage and Archaeology [APP-057].</p> <p>However, the reference to the earlier version was not corrected. The 2021 version is, however, correctly referenced within ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1].</p>
HE26	<p>Page 13, Paras. 3.16 and 3.17</p> <p>Section 8.9 outlines the additional mitigation measures that would be implemented. It is stated that this would be secured through the Outline Archaeological Mitigation Strategy (Section 8.9.1). However, the precise layout of aspects of the scheme are not yet available and so the details of the areas of the mitigation cannot yet be determined. This information needs to be provided as soon as it is available to ensure that appropriate mitigation is being applied to each area.</p> <p>The proposed mitigation would include geophysical survey (magnetometry) of areas that were previously inaccessible (Section 8.9.2), informative trenching in areas not subject to previous trenching (Section 8.9.4), geoarchaeological assessment for areas of deep impact (Section 8.9.5), archaeological excavation (Section 8.9.6), archaeological monitoring (Section 8.9.9) and preservation (Section 8.9.10). These approaches are what we would expect to see as part of a mitigation strategy.</p>	<p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been specifically designed, in consultation with NCC, to allow for the fact that precise details of all potential below ground impacts are not currently available. This document ensures that appropriate evaluation and mitigation can be implemented once the details are known.</p>
HE27	<p>Page 13, Para. 3.18</p> <p>It is noted that embedded mitigation would be used to mitigate impact upon buried archaeology through the use of concrete blocks as ballast, avoiding the need for piles and minimising the ground disturbance. We would recommend that issues such as compaction are considered as this could result in physical damage to vulnerable archaeological remains, or changes to the preservation of an archaeological site.</p>	<p>Whilst allowance has been made for the use of concrete blocks. It is anticipated that their use would only be implemented where it was not possible to relocate piles to avoid archaeological remains. The use of concrete blocks would be agreed in advance with NCC, taking into account any potential compaction issues. To date, no archaeological remains have been identified that would be potentially sensitive to the low loads that would be applied by concrete blocks.</p> <p>All potential below ground impacts upon the archaeological resource will be mitigated in accordance with ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1].</p>
HE28	<p>Page 13, Para. 3.19</p> <p>Issues of potential chemical pollution are discussed in Chapter 12. It should be noted that pollution of an archaeological site could impact the ability of materials to be assessed using techniques such as radiocarbon dating or the study of ancient DNA. In addition, contamination may make sites inaccessible due to health and safety issues which may rule out any further archaeological assessments. We would recommend that the Historic England document 'Land Contamination and Archaeology' (2017) is referred to: https://historicengland.org.uk/images-books/publications/land-contamination-and-archaeology/.</p>	<p>There are no chemical pollution sources specific to the operation of solar farms, although general construction activities can have potential to introduce pollutants. Procedures to manage any potential chemical contamination are laid out in Table 7 Water Resources of the oCEMP [APP/7.6.2], therefore, reference to 'Land Contamination and Archaeology' is not necessary.</p>
HE29	<p>Page 14, Para. 3.20</p> <p>Issues such as changes to ground water flow and compaction of soils have also been discussed within Chapter 12. It should be noted that changes to groundwater levels or compaction of archaeological deposits may result in physical damage or changes to the</p>	<p>No archaeological remains have yet been identified that could be sensitive to these issues; however, ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been specifically designed, in consultation with NCC, to allow for the fact that precise details of all potential below</p>



Reference	Comments	Applicant's Response
	<p>preservation of an archaeological site. This could result in the degradation and/or loss of vulnerable remains, particularly organic remains that may be preserved through waterlogging. We would recommend that the Historic England document 'Preserving Archaeological Remains' (2016) is referred to, and the impacts that this issue may have on archaeological remains are considered: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/.</p>	<p>ground impacts are not currently available. This document ensures that appropriate evaluation and mitigation can be implemented once the details are known.</p>
HE30	<p>Page 14, Para. 3.22 It is noted that the discussion of the archaeology focuses [in Appendix 8.3: Archaeological DBA] entirely on structures, features and finds. It does not discuss the palaeoenvironmental potential which should also be considered.</p>	<p>Palaeoenvironmental potential is covered in ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160] and allowance for further palaeoenvironmental assessment is covered in ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1].</p>
HE31	<p>Page 14, Para. 3.23 Section 4.5 [of Appendix 8.4: Geophysical Survey Report] states that there was low magnetic contrast between the sandy Breckland soils and the bedrock. There is therefore the possibility that the archaeological remains may be more extensive than recorded by the survey. This needs to be considered carefully as this could result in risks to the project timetable if unexpected remains are discovered.</p>	<p>It is recognised that geophysical survey does not identify all archaeological remains, which is why allowance has been made for trenching of the geophysically 'blank' areas in ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1].</p>
HE32	<p>Page 14, Para. 3.24 The discussion section [of Appendix B.1: Metalwork, Appendix 8.6: Archaeological Trial Trenching report] does not mention the need for any further analytical work on the remains (e.g. X-radiography) or conservation requirements.</p>	<p>The trenching was undertaken in accordance with a Written Scheme of Investigation (WSI) that was approved by NCC and which outlines conservation requirements. The trenching report states that the works were undertaken in accordance with that WSI and, therefore, repeating conservation requirements is superfluous. It is common practice for any further analytical work to be held over until the mitigation phase when the finds can be placed within their full context. It should be noted that the report has been approved by NCC, who also agreed the WSI and monitored the works in the field.</p>
HE33	<p>Page 14, Para. 3.25 The discussion section [of Appendix B.8: Glass, Appendix 8.6: Archaeological Trial Trenching report] does not mention the need for any further analytical work on the remains or conservation requirements.</p>	<p>Please refer to response HE32 directly above.</p>
HE34	<p>Pages 14 and 15, Paras. 3.26 and 3.27 It is stated in this document that WSIs would be produced post-consent that would be in line with the Archaeological Mitigation Strategy. It would be useful if Historic England are consulted on the WSIs, particularly the Science Advisor for the East of England (Zoe Outram) to review aspects such as the sampling strategies. The development of a robust and precise chronology is required to address a number of the research questions proposed for the project (Section 2.3). We would recommend that the value of developing the chronology within a Bayesian framework is considered, and that this is discussed with a specialist. This could help determine the sort of questions that can be addressed with the material/features that can be sampled.</p>	<p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1], at paragraph 4.36 states, that the Historic England Regional Science Advisor will be consulted with regards to scientific dating. These discussions will include the potential for use of a Bayesian framework.</p>
HE35	<p>Page 15, Para. 3.28 3.2 states that additional geophysical survey work would be carried out for the areas that were previously not available for survey. It should be stated if the WSI produced for the previous geophysical survey would be used or if a separate document would be prepared. If the existing WSI would be utilised, a reference to the document should be included here.</p>	<p>At this stage it is not known whether the geophysical survey will be undertaken by the same contractor. It is, therefore, safest to assume that a separate WSI will be issued.</p>



Reference	Comments	Applicant's Response
HE36	<p>Page 15, Para. 3.29</p> <p>3.4 states that additional informative trenching would be carried out for the areas that were previously not available/accessible. It should be stated if the WSI produced for the previous trenching would be used or if a separate document would be prepared. If the existing WSI would be utilised, a reference to the document should be included here.</p>	<p>Please refer to response HE35 directly above.</p>
HE37	<p>Page 15, Paras. 3.30 and 3.31</p> <p>3.5 states that the location of deep impacts of the proposed scheme are not yet know, and so it is not possible to firmly identify the need for and location of any geoarchaeological assessment. It is noted that a scope for any geoarchaeological assessment would be agreed with NHES, but we would recommend that details of the sort of work that may be carried out should be included in this document. Additional detail can be included in the subsequent WSIs but it is important to acknowledge the overall approach in this document, as this would form the foundation of later strategies. This information is needed so it is clear how this work would proceed, but also to outline what is expected of the contracting unit(s) responsible for excavating the sites.</p> <p>The potential geoarchaeological work should be carried out with reference to the Historic England documents Geoarchaeology (2015, https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/) and Deposit Modelling and Archaeology (2020, https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/). Details should be included about the sort of approaches that may be utilised (auger surveys, boreholes etc.) and the equipment that may be required (handheld equipment, borehole rigs etc.).</p>	<p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been produced in consultation with NCC (NHES) and approved as providing an appropriate strategy. As the location of deep impacts (or indeed whether any will take place) is not yet known, the methodology to be used is also not yet known. Should geoarchaeological works be required, a separate WSI will be required and any contracting unit will, therefore, be fully aware of what is expected. Naming techniques that may or may not be employed is, therefore, not appropriate at this stage. However, section 3.5 of the oAMS has been updated at Deadline 2 to include reference to the Historic England documents Geoarchaeology (2015) and Deposit Modelling and Archaeology (2020).</p>
HE38	<p>Page 15, Para. 3.32</p> <p>3.10 outlines the approach to the preservation of archaeological sites/remains. We would recommend that the Historic England document 'Preserving Archaeological Remains' (2016) is referred to, to ensure that the preservation strategy is appropriate for the site and the specific archaeological remains in question: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/.</p>	<p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been updated at Deadline 2 to include reference to the Historic England document 'Preserving Archaeological Remains' (2016).</p>
HE39	<p>Page 16, Paras. 3.33 and 3.34</p> <p>There is no mention [<i>in Appendix 8.7: Outline Archaeological Mitigation Strategy (AMS)</i>] that environmental samples would be recovered in the Intrusive Fieldwork sections (Section 4.8-4.15). This needs to be included so it is clear what work is expected by the contracting unit(s).</p> <p>4.12 states that structures or industrial features would be fully (100%) excavated. We would recommend that the potential for fired features, such as hearths, kilns, ovens and furnaces to be dated using techniques such as archaeomagnetic dating is considered before they are excavated. Archaeomagnetic dating requires the collection of in situ samples, and so any excavation could remove suitable material from the feature. The potential of the features should be discussed with a relevant specialist, which could include the Historic England Science Advisor for the East of England, Zoe Outram.</p>	<p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] already includes a section on palaeoenvironmental sampling (paragraphs 4.28 to 4.31) and, at paragraph 4.36, states that the Historic England Regional Science Advisor will be consulted with regards to scientific dating.</p>
HE40	<p>Page 16, Para. 3.35</p>	<p>This is covered by paragraphs 4.42 and 4.43 of the ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1].</p>



Reference	Comments	Applicant's Response
	<p>4.20 [in Appendix 8.7: Outline Archaeological Mitigation Strategy (AMS)] states that archaeological monitoring may be suspended if remains of negligible archaeological potential are demonstrated to be present. Can it be confirmed that strategies would also be adjusted if remains of higher potential and significance are identified during the monitoring works?</p>	
HE41	<p>Page 16, Paras. 3.36 and 3.37</p> <p>Sections 4.28-4.31 [in Appendix 8.7: Outline Archaeological Mitigation Strategy (AMS)] discuss the palaeoenvironmental sampling strategy. It should be noted that a revised version of the Historic England document 'Environmental Archaeology' (2025) was recently released: https://historicengland.org.uk/images-books/publications/environmental-archaeology-3rd/. This document should be referred to in this section.</p> <p>The sampling strategy should address specific questions posed by the project. This section therefore needs to include the aims and objectives of the proposed work, considering the nature and range of biological remains present, the possible variations in preservation, the differential distribution of remains (both vertically and horizontally) and the significance of these remains in a local, regional and national context. The strategy should also make provisions for specialists to visit the sites to support the sampling programme.</p>	<p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been updated at Deadline 2 to include reference to the Historic England document 'Environmental Archaeology' (2025).</p> <p>Research questions are outlined in paragraph 2.3 of ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1]. Specific sampling strategies are better suited to be included within subsequent detailed design stages that are aligned to each phase of works rather, than the overarching ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1]. ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been updated at Deadline 2 to make explicit reference to these strategies being detailed at the detailed design stage for each stage of works.</p>
HE42	<p>Pages 16 and 17, Paras. 3.38 and 3.39</p> <p>Different levels of investigations are discussed within the Archaeological Mitigation Strategy, including monitoring, informative trenching and excavation. The sampling strategies need to be developed to address these different types of investigation. For example, the strategy developed for the excavation phase would build on the findings of the informative trenching phase and potentially address more targeted questions. In its current form, the document does not discuss the findings of the previous work, or state how this information has been used to guide the excavation and sampling strategy.</p> <p>Specific sampling strategies should also be developed for some features and remains. For example, industrial structures and remains, human remains and occupation surfaces. These features and remains may require spatially distinct samples to be recovered, such as sampling the head, torso and feet of an inhumation (see The Role of the Human Osteologist in Archaeological Fieldwork Projects, Historic England 2018: https://historicengland.org.uk/images-books/publications/role-of-human-osteologist-in-archaeological-fieldwork-project/). Specific sampling approaches may also be required, such as physical or chemical techniques to investigate industrial features or occupation surfaces.</p>	<p>As the evaluative stage (informative trenching) has not yet been completed, it is considered premature to include a section on the excavation sampling strategy. Specific sampling strategies are better suited to be included within subsequent detailed design stages aligned to each phase of works, rather than the overarching ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1]. ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been updated at Deadline 2 to make explicit reference to these strategies being detailed in at the detailed design stage for each stage of works.</p>
HE43	<p>Page 17, Para. 3.40</p> <p>It is stated in Section 4.37 that all artefacts would be cleaned as standard. We would recommend that the cleaning of items is considered on a case-by-case basis to ensure that opportunities to sample materials are maximised. For example, cleaning may damage and/or remove organic residues that may be present (see the Historic England guidance 'Organic Residue Analysis and Archaeology' (2017): https://historicengland.org.uk/images-books/publications/organic-residue-analysis-and-archaeology/).</p>	<p>Section 4.37 does not state that all finds would be cleaned as standard, rather that they will be treated in a proper manner (and this will be done on a case-by-case basis).</p>



Reference	Comments	Applicant's Response
HE44	<p>Page 17, Para. 3.41</p> <p>4.46 provides an outline of the resulting reports produced for the informative trenching work. We would recommend that the potential of each class of remains is discussed within the report, as well as the recommendations for further work. This information is needed to help guide the strategy for any further excavation work, including the sampling strategies.</p>	<p>This is generally covered within the discussion/conclusion section; however, ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] has been updated at Deadline 2 to make this clearer.</p>
HE45	<p>Pages 17 and 18, Para. 3.42</p> <p>Section 6 states that the Archaeological Contractor would be a CIFA Registered Archaeological Organisation, but it would be useful to state if the appointed contractor would be responsible for producing the Site Specific WSIs in line with the Archaeological Mitigation Strategy. This should include details of the specialists that would be utilised.</p>	<p>At this stage it is not clear whether the WSIs (and/or detailed design stage) will be produced by the archaeological contractor or the consultant. It is stated in the ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] that all work will be undertaken in accordance with Standards for Development-Led Archaeological Projects in Norfolk (Robertson et al 2018), which requires the details of specialists to be included.</p>
HE46	<p>Page 18, Paras. 4.1 and 4.2</p> <p>Historic England welcomes inclusion of Requirements 12 within the wording of the draft DCO which are related to archaeological mitigation.</p> <p>We have proposed some changes to the draft AMS which is referenced in the DCO requirement and recommend the document is revised and any revisions are agreed and concluded with Historic England prior to the works commencing.</p>	<p>The Applicant welcomes Historic England's confirmation of its approval of Requirement 12 of the draft DCO [APP/3.1.2], and has responded to the proposed changes to the ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] in the corresponding rows above.</p>
HE47	<p>Pages 18 and 19, Paras. 5.1 – 5.10</p> <p><i>[The Applicant does not duplicate Paras. 5.1 – 5.9 here as they reflect Planning Policy]</i></p> <p>The Holford Rules are also relevant given the overhead powerlines. Rule 2: 'Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, ie the more massive structures which are used when lines change direction. - Where possible choose routes which minimise the effects on the setting of areas of architectural, historic and archaeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments.'</p>	<p>It is agreed that the Holford Rules are also relevant. Agenda Item 3.1 of the Written Summary of Applicant's Oral Submissions and Responses to Action Points at Open Floor Hearing 1 [REP1-070] details how, in responding to a question from the ExA regarding the inclusion of the National Grid Substation in the Order limits, the Applicant noted that NGET's guidelines on siting and design were applied to the site selection exercise, including the Holford Rules. The approach taken by the Applicant, in line with the Holford Rules, is outlined in detail within Appendix 1 (Site Evaluation Report) of the Planning Statement [REP1-012].</p>
HE48	<p>Pages 19 and 20, Paras. 6.1 – 6.3</p> <p>Historic England's primary concern is the impact of the development on the designated heritage assets at Castle Acre: the Castle, Priory and conservation area.</p> <p>The development lies to the south of Castle Acre and much of it would be screened from views by Bartholomew Hill Plantation and by the topography which slopes down towards Swaffham.</p> <p>The amendments to the scheme since the PIER have helped considerably to reduce the impact of the proposals with the relocation of the BESS, substations and some panels.</p>	<p>The Applicant welcomes this comment.</p>
HE49	<p>Page 20, Paras. 6.4 – 6.9</p> <p>However, elements of the scheme remain visible from these highly significant heritage assets, the Castle and Priory. These would erode the rural character of the landscape which contributes to their significance.</p> <p>These sites survive cumulatively as a remarkable record of a significant transition in the history of England and illustrate aspects of society in this period and into the medieval</p>	<p>The Applicant does not agree with the levels of harm identified by Historic England for the reasons set out in the above responses and is content that the levels identified within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are robust and justifiable.</p> <p>With regards to further mitigation planting, the very small areas of panels that would be visible from the Castle and Priory are testament to the fact that the Scheme has been designed in such a way to ensure minimal visibility from these assets. The remaining visibility is due to rising topography and the angle of views that cannot simply be screened by additional planting. Visibility of such small</p>



Reference	Comments	Applicant's Response
	<p>era. The Castle and Priory are highly evocative in this way, and the rural landscape plays a large part in reinforcing their interest.</p> <p>The impact of the development would result in a moderate level of harm to the significance of the Castle and the Priory, the harm to the Priory being higher because of its closer proximity to the development. There would be a low level of harm to the conservation area.</p> <p>We have discussed mitigation and the applicant has advised that it is not possible to offer further mitigation through planting to reduce the impact of panels. However, given the way the existing planting helps with screening views in the photomontages, this might be revisited.</p> <p>Much of the harm is however derived from the overhead line and the doubling of the lines in Scenario A. Given its height, it is not possible to mitigate this through planting. It is not proposed to remove the additional line after decommissioning which would result in a permanent impact.</p> <p>Mitigation could however be offered through Scenario B which would reduce the level of harm.</p>	<p>areas of panels within much wider vistas, where expanses of agricultural land can be seen between the assets and the panels, is not considered to be harmful.</p> <p>The Applicant's preference is also Scenario B, but the Applicant cannot commit (at this stage) to which scenario will be taken forward. This confirmation will come at detailed design stage. Details of the Applicants reasoning for retaining flexibility at this stage is presented in Q9.0.1 in Applicants Response to ExQ1 [REP1-069].</p>
HE50	<p>Page 20, Paras. 6.10 and 6.11</p> <p>We therefore strongly recommend Option B is taken forward in line with the Holford Rules. Rule 2 is to avoid smaller areas of high amenity value – where possible choosing routes which minimise the effects on the setting of architectural, historic and archaeological interest including conservation areas, listed buildings, listed parks and gardens and ancient monuments.</p> <p>Any consent should also require the proposed maintenance and strengthening of the planting which screens and filters the impact of the development, in particular that at Bartholomew's Hill Plantation.</p>	<p>The Applicant's preference is also Scenario B, but the Applicant cannot commit (at this stage) to which scenario will be taken forward. This confirmation will come at detailed design stage. Details of the Applicants reasoning for retaining flexibility at this stage is presented in Q9.0.1 in Applicants Response to ExQ1 [REP1-069].</p>
<p>Natural England – Responses to Written Questions [REP1-092]</p>		
NE2-1	<p>Page 7, Q3.0.1</p> <p>The European Site Conservation Objectives: Supplementary advice on conserving and restoring site features for Breckland Special Protection Area (SPA) (published 31 August 2022) states that "Nesting [Stone Curlew] outside of the SPA boundary may form part of the wider population but are protected separately by Schedule 1 of the Wildlife & Countryside Act, 1981, as amended, and / or SSSI protection if nesting within a SSSI". Stone Curlew nest density has been shown to be negatively impacted by the built environment, with lower nest densities found up to 1.5km from settlements (Sharp et al, 2008) and Stone Curlews respond to visual disturbance including road traffic, walkers and dog walkers up to 500m away (Taylor et al, 2007). The proposed order limits are approximately 5km from Breckland SPA at their nearest point. Should further surveys find Stone Curlew nests within the proposed order limits, Natural England would not consider these nests to be part of the SPA population. However, consideration of stone curlew as a protected species may still be required if there is historical evidence of stone curlew nesting in the area.</p> <p>We would therefore advise consideration of surveys for nesting Stone Curlew may be required. In the first instance we advise that you request historic nest records from the RSPB (via DataUnit@rspb.org.uk). If, on the basis of these surveys, there is evidence of nesting within 500m of the boundary of the site, we would advise that nest surveys are</p>	<p>The Applicant welcomes this comment.</p> <p>The Applicant is in agreement that Stone-curlew is a protected species under Section 1 of the Wildlife and Countryside Act 1981 (such that any intentional or reckless killing, injury, taking, damage or destruction of nests, obstruction or prevention of access to nests or damage or destruction of eggs) in addition to being further specifically protected by virtue of inclusion on Schedule 1 of that Act (in line with a number of other bird species), such that it is also protected from disturbance whilst building a nest, in or near a nest containing eggs or young, or disturbance of dependent young. In line with other bird species, mitigation measures (including timing of works) are set out in the oCEMP [APP/7.6.2], which would prevent any potential offence in regard to Stone-curlew or any other bird species.</p> <p>The Applicant notes the request for historic records to be obtained from the RSPB (notwithstanding any records submitted to the local Biological Records Centre by the RSPB would have already been obtained), and has further contacted the RSPB with a view to confirming any additional records that may be held.</p>



Reference	Comments	Applicant's Response
	<p>conducted of the proposed site, and this 500m buffer. Evidence has shown that Stone Curlews respond to visual disturbance including road traffic, walkers and dog walkers up to 500m away. They could therefore be disturbed by human activities during construction.</p> <p>Natural England has produced standing advice to help understand the impact of particular developments on protected species, which you may wish to refer to - https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications. A protected species licence may be required in certain cases. We refer you to the guidance, Wildlife licences: when you need to apply (https://www.gov.uk/guidance/wildlife-licences) for more information.</p>	
NE2-2	<p>Pages 7 and 8, Q3.0.2</p> <p>As advised in our response to Q3.0.1, please refer to Natural England's standing advice Protected species and development: advice for local planning authorities (available at: https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications) which is intended to help decision makers understand the impact of particular developments on protected species. A protected species licence may be required in certain cases. We refer you to the guidance, Wildlife licences: when you need to apply (https://www.gov.uk/guidance/wildlife-licences) for more information.</p> <p>With reference to the bird species features of designated sites, Natural England concur with the conclusion of the Shadow Habitats Regulations Assessment (SHRA) [APP/7.3.1] which identifies that any likely significant effects on European sites can be ruled out. We also concur with the conclusion of the Environmental Statement Chapter 7: Ecology and Biodiversity [APP/6.2], which identifies there will be no significant adverse effects on sites of special scientific interests (SSSIs), subject to appropriate mitigation being effectively implemented and secured.</p>	<p>The Applicant notes and agrees with the advice in regard to standing advice for protected species and development. The Applicant also welcomes the confirmation from Natural England that they concur with the conclusions of the Shadow Habitats Regulations Assessment [AS-057] that any likely significant effects on European sites can be ruled out, and the conclusions of ES Chapter 7: Ecology and Biodiversity [REP1-034] that there will be no significant (in EIA terms) adverse effects on SSSIs subject to the securing and implementing or appropriate mitigation.</p>
NE2-3	<p>Page 9, Q3.0.8</p> <p>No likely significant effects on designated sites have been identified in relation to bat species; however, Natural England advises that sufficient information should be provided to demonstrate that impacts to bat populations are appropriately assessed and mitigated, particularly in relation to the siting of infrastructure such as substations and BESS at an early stage to avoid delay. We provide the following comments in relation to this:</p> <p>Point 1: An IP [RR-058] requests a review of the research from the University of Stirling's Article Renewable energies and biodiversity: Impact of ground mounted solar photovoltaic sites on bat activity, which concludes that "Ground-mounted solar photovoltaic developments have a significant negative effect on bat activity"</p> <p>The studies on the loss and/or modification of bat foraging and commuting routes due to solar developments demonstrate mixed results, and it is acknowledged that there are significant evidence gaps within the UK in particular. Due to this Natural England would recommend precaution is applied when assessing the impacts of a solar scheme, especially when rare species have been identified.</p> <p>Natural England has reviewed the surveys conducted by the scheme to assess impacts on foraging and commuting bats. The surveys conducted included nighttime bat walkover surveys undertaken in May, August, and October 2024 and automated static bat detector surveys were carried out at 12 locations between May and October 2024. The surveys conducted were broadly aligned with current guidelines and best practice.</p>	<p>The Applicant notes and welcomes the confirmation that the survey work is sufficient.</p> <p>Impacts on bat species, including roosting and foraging has been assessed in ES Chapter 7: Ecology and Biodiversity [REP1-034], with in particular the siting of the Customer Substation, National Grid Substation and BESS in Fields 27 and 24 assessed on a worst-case basis. This assessment and concluded that, following the implementation of the embedded mitigation and additional mitigation proposed, the Scheme will result in no adverse likely significant (in EIA terms) effects on bats. The key features identified to support bat commuting and foraging within the Site are the hedgerows and woodland edges. The Customer Substation and BESS will be located internally within fields and will not affect boundary features, including no significant light spill onto boundary features, and as such features of importance for bats will remain unaffected and connectivity maintained within the landscape.</p> <p>The Applicant notes and agrees that precaution be applied when assessing the impacts of a solar scheme, especially when rare species have been identified and this approach has been taken in relation to the Scheme.</p>



Reference	Comments	Applicant's Response
	<p>Based on the retention of existing trees, buildings and hedgerows the survey effort conducted is considered sufficient to assess likely impacts of the installation and operation of the photovoltaic panels themselves.</p>	
NE2-4	<p>Page 9, Q3.0.8</p> <p>It is stated in the Ecology and Biodiversity chapter that no significant adverse impacts on foraging and/or commuting bats are anticipated in relation to loss of habitats due to the habitat loss being of low value. From review of the baseline ecological survey report it has been identified that some of the arable fields include livestock management, which is likely to be of higher value to multiple bat species present than arable cultivation. Natural England would recommend the value of the habitat is re-assessed to identify if suitable foraging habitat is likely to be lost. If it is considered more important than originally thought Natural England would recommend reducing the density of solar panels within these areas.</p> <p>The scheme has included buffers which will be implemented from the construction phase and will remain in-situ for the lifetime of the scheme. Generally, the buffers ranging between 10-15m are likely to be appropriate across the scheme. In particular areas where barbastelle activity is highest and around known optimal habitats, i.e. the woodlands, Natural England would suggest additional mitigation approaches are included, e.g. planting to increase availability of optimal habitat.</p>	<p>Consideration of bat use and value to bats was considered within the ES Chapter 7: Ecology and Biodiversity [REP1-034], including based on the results of the survey work. The survey results recorded the numbers of bats across the Site, which will therefore reflect the land management including any use by livestock, which has been taken into account under the current evaluation. It is acknowledged that a relatively small proportion of the Site was recorded to be in use for pig rearing at any one time, albeit such use was recorded to rotate around the relevant arable fields (dependent on cropping) throughout the Site and therefore does not represent particularly raised value in any specific location, such that the previous evaluation remains unchanged, with the key features and habitats for bat foraging and commuting activity remaining the woodlands and field boundary vegetation areas. The Applicant therefore does not consider that re-assessment is necessary.</p> <p>The Applicant welcomes the advice that buffers of 10-15m are likely to be appropriate across the Scheme (in particular associated with woodlands, consistent with the proposed buffers identified within the oLEMP [REP1-060]). Further, the Applicant confirms that additional mitigation approaches such as planting will be provided within the associated buffers, thereby resulting in increased potential/optimal habitat, as secured within the oLEMP [REP1-060].</p>
NE2-5	<p>Pages 9 and 10, Q3.0.8</p> <p>Point 2: Norfolk Wildlife Trust (NWT) [RR-045] raises a significant concern that the proposed siting of substations and Battery Energy Storage System (BESS) within Fields 24 and 27 coincide with some of the highest levels of bat activity recorded on site, as identified in the Baseline Ecology Report. In particular, it states:</p> <p><i>“15. The presence of barbastelle bats, a protected species, within the red line boundary is of particular concern. Paragraph 7.7.25 (Chap 7, ES) states that no new lighting is proposed within the Solar PV (Photo-Voltaic) Site areas and that new lighting will be limited to locations essential to security, namely the Customer Substation, National Grid Substation, and Battery Energy Storage System (BESS).</i></p> <p><i>16. Currently, the BESS and substation are proposed to be located within fields 24 and 27. These are the fields with some of the highest recordings if [sic] bat activity.”</i></p> <p>Natural England agrees with this concern and would recommend, if possible, the substations and BESS are re-sited to a different location to minimise potential adverse impacts from the operation of the substations and BESS.</p> <p>If re-siting of the substations and BESS are not considered possible, Natural England would recommend in line with the comments in our Relevant Representations (26 February 2026, Our Ref: 538749) that a detailed lighting assessment is conducted to inform the proposed lighting mitigation strategy, this will ensure the proposed levels are appropriate for barbastelles, and other bat species recorded on site. Any lighting strategy designed should be in accordance with best practise guidance.</p>	<p>The Applicant notes the concerns raised in regard to the need to ensure that a detailed lighting assessment is conducted in order to ensure that lighting levels are appropriate for bats, including Barbastelle, given the raised levels of bat activity recorded to be associated with the boundary vegetation and woodland in proximity to the substation and BESS. The raised activity levels were associated with the woodland and boundary vegetation, which will be retained with increased buffers (in line with those discussed in relation to NE2-4). Commitments to ensure that a detailed lighting scheme is developed as part of the detailed design have been made within the oCEMP [APP/7.6.2] and oOEMP [APP/7.8.2] to ensure that the associated areas used by raised numbers of bats remain unlit, subject to which the location of the BESS and substation within the internal areas of Fields 24 and 27 will not be adversely affected. This Applicant trusts that this addresses the concern and that re-siting is therefore not required.</p>
NE2-6	<p>Page 10, Q3.0.9</p> <p>Natural England's comments have focused on the potential for effects on designated sites. However, in relation to the proposed general ecological mitigation for skylark and eurasian curlew, Natural England refers to its Relevant Representations (26 February 2026, Our Ref: 538749), where it advised that the outline Landscape and Ecological</p>	<p>Design Principles in relation to ongoing management measures are secured in the oLEMP [REP1-060]. Specific measures, including predator-exclusion measures, would be anticipated to include secure fencing, further details of which, along with monitoring measures, would be set out within the detailed Landscape and Ecological Management Plan, as secured through Requirement 7 in</p>



Reference	Comments	Applicant's Response
	<p>Management Plan (oLEMP) remains high-level and requires further detail, including clear success criteria, monitoring frameworks and management provisions to ensure delivery of the mitigation area. Natural England notes that pylons are proposed as part of the Scheme, and advise that the Applicant provides sufficient information to demonstrate that the mitigation measures are appropriately designed and located, and that the presence of infrastructure does not undermine the ability of the mitigation area to function effectively, including consideration of potential disturbance and predator perching effects.</p>	<p>Schedule 2 to the draft DCO [APP/3.1.2] (including delivery of relevant mitigation for the duration of the operational lifespan).</p> <p>As previously set out in the Applicant's Response to the Relevant Representations (in particular responding to Natural England's Relevant Representations (26 February 2026, Our Ref: 538749) the oLEMP [REP1-060]) has been updated at the same time to incorporate the items raised, with further detail secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.2].</p>
NE2-7	<p>Page 10, Q3.0.10</p> <p>Natural England has provided comments regarding potential impacts to the River Nar SSSI within its Relevant Representations (26 February 2026, Our Ref: 538749). Based on the information submitted, Natural England concurs that, subject to appropriate mitigation being effectively implemented and secured—particularly in relation to pollution prevention and surface water management—the proposal is unlikely to result in adverse effects on the notified features of the River Nar SSSI.</p>	<p>The Applicant welcomes this comment.</p>
NE2-8	<p>Page 11, Q3.0.11</p> <p>Based on the information provided to date, there are no likely significant effects on designated sites arising from deer presence related to activity associated with the Scheme. As such, Natural England do not have any further comment to make on this matter.</p>	<p>The Applicant welcomes this comment.</p>
<p>Environment Agency – Response to Written Questions [REP1-086]</p>		
EA2-1	<p>Page 2, Q8.0.3</p> <p>Following Issue Specific Hearing 1, in correspondence with the Applicant, we have requested the Applicant produces a technical note summarising their review of groundwater model data provided by the Environment Agency and any implications for their hydrogeological model for the Proposed Development. The Applicant proposed to update Chapter 12: Water Resources at Deadline 2 to compare the North East Anglia Chalk model results (wet day) with the groundwater elevations derived for the triangulation analysis used in the Environmental Statement. We find this approach acceptable, and look forward to reviewing the updated document.</p>	<p>The Applicant refers to its response to EA1-2 above on this matter.</p>
EA2-2	<p>Page 2, Q8.0.3</p> <p>Provided that adequate post-consent ground investigation and monitoring are secured via the Development Consent Order, if groundwater levels are found to interact with the proposed BESS and/or Substation foundation extents, and based on the proposed mitigation measures set out in APP-171 Table 12-4 and secured via the outline Construction Environment Management Plan (CEMP), we concur that any significant risks posed to the WFD Groundwater body by these construction activities can be adequately mitigated.</p>	<p>Groundwater monitoring infrastructure will be installed post-consent, and site-specific groundwater level data will be collected to refine the existing hydrogeological conceptual model. Monitoring will be undertaken over an appropriate duration to capture seasonal variation and is secured within the oCEMP [APP/7.6.2].</p> <p>The monitoring data will be used to verify the assumptions adopted in ES Chapter 12: Water Resources [APP/6.2.1]. Should groundwater levels be shallower than groundwater assumptions, appropriate design and mitigation measures will be developed and implemented, as secured within Tables 3.2 - 3.4 of Design Principles, Parameters and Commitments [APP/5.8.2].</p>
EA2-3	<p>Page 2, Q8.0.3</p> <p>The Applicant also indicates in APP-171 Table 12-4 that impacts from Horizontal Directional Drilling (HDD), if required, can be mitigated in part by carrying out these works when groundwater levels are not within 15m of ground level. We seek assurance from the Applicant that should post-consent monitoring demonstrate that interaction of HDD</p>	<p>As set out in Table 3.6 of Design Principles, Parameters and Commitments [APP/5.8.2], the Applicant commits to an alternative construction methodology to HDD, such as open cut trenching, will be implemented should post consent groundwater monitoring identify that interaction between HDD and groundwater is unavoidable.</p>



Reference	Comments	Applicant's Response
	with groundwater is unavoidable, potentially significant effects on the WFD Groundwater body can be mitigated with an alternative approach.	
EA2-4	<p>Page 2, Q8.0.4</p> <p>The application and adequacy of the Sequential Test sits under the remit of the Local Planning Authority. However, we note that the site lies almost entirely within Flood Zone 1, and development will be at low risk of flooding from rivers and sea. There is a small section of the site under work no.11 – to be used for Skylark plots - which falls within flood zones 2 and 3. It is also acknowledged that flood risk has been considered in the site selection process. Given these details, we consider the conclusions on the Sequential and Exception Tests within the submitted FRA to be acceptable.</p>	The Applicant welcomes this comment.
EA2-5	<p>Pages 2 and 3, Q8.0.4</p> <p>We have made separate comments relating to flood mitigation at the BESS within the site (EA12), where infrastructure is proposed to be raised in mitigation of potential surface water flood risk impacts. The applicant has made commitments within their first draft of the Statement of Common Ground to ensure that surface water flooding will be managed appropriately to avoid and manage risk to the BESS areas.</p>	<p>The Applicant commits to locating BESS infrastructure at least 300 mm above the modelled design flood level where required, which is secured within Design Principles, Parameters and Commitments [APP/5.8.2]. ES Appendix 12.2: Flood Risk Assessment [APP/6.4.2] has been updated at Deadline 2 to explicitly address BESS fire scenarios under flood conditions, including the behaviour of contaminated firewater, interaction with floodwater and confirmation that containment and isolation systems remain effective during such events. These measures are secured through the updated ES Appendix 12.2: Flood Risk Assessment [APP/6.4.2] and the relevant DCO Requirement.</p>



4. The Applicant's responses to Organisations and Businesses

Reference Number	Comments	Applicant's Response
Norfolk Wildlife Trust – Written Representation [REP1-096]		
NWT1	<p>Page 2, Para. 2</p> <p>Norfolk Wildlife Trust has engaged with the Island Green Power Project Team, and their ecological consultants, regarding the Project as part of the pre-application process.</p>	<p>The Applicant notes this comment and welcomes ongoing engagement with NWT.</p>
NWT2	<p>Page 2, Para. 3</p> <p>Norfolk Wildlife Trust supports solar energy development in principle, recognising its importance in meeting the UK Government's commitments on energy security and net zero carbon emissions by 2050. However, our support for The Droves Solar Farm is qualified. The Project must be designed, constructed, operated and decommissioned in a way that:</p> <ul style="list-style-type: none"> - Avoids harm to designated sites, priority habitats and protected species. - Delivers ambitious biodiversity net gain, exceeding the statutory minimum. - Contributes meaningfully to nature recovery and ecological connectivity at a landscape scale; and - Provides genuine and lasting benefits to local communities. 	<p>As outlined within a previous response to NWT3 within Table 4.4 of Applicant's Response to Relevant Representations [REP1-067], potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [REP1-034], including with specific reference to international, national and locally designated sites of ecological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats, which concludes that following the implementation of embedded mitigation and additional mitigation measures, there are no likely significant (in EIA terms) adverse effects.</p> <p>An updated Biodiversity Net Gain Assessment Report [REP1-048] was provided at Deadline 1, which demonstrates that the Scheme will result in demonstrable net gains in habitat units and hedgerows units within the Site. These gains are in excess of 400 habitat units and in excess of 185 hedgerows units. As set out in Requirement 9(2) of Schedule 2 of the draft DCO [APP/3.1.2], the Applicant has secured a minimum of 10% biodiversity net gain in habitat units and a minimum of 10% for hedgerow units.</p> <p>The Norfolk's Local Nature Recovery Strategy (LNRS) principles, which encourage consideration at a landscape scale, have, where appropriate, informed the approach to biodiversity enhancements across the Order limits outlined within the oLEMP [REP1-060] and shown on Appendix 1: Green Infrastructure Plan. Priorities and opportunities set out within the Norfolk Biodiversity Action Plan and Buglife's 'B-Lines' Initiative have been considered. These enhancements are secured in detail through Requirement 7 of the draft DCO [APP/3.1.2].</p> <p>In response to the fourth bullet point, the Applicant has set out the provision of a Community Benefit Fund in Section 5.5 of the Planning Statement [REP1-012]. Section 9.4 of the Planning Statement [REP1-012] sets out further benefits to the community, such as improved connectivity as a result of new permissive paths, additional jobs across each phase of the lifetime of the Scheme, and employment and skills benefits to enhance local education through promoting apprenticeship and training schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practices.</p>
NWT3	<p>Page 2, Para. 4</p> <p>At present, NWT considers that further information and design refinement are required before the Project can be considered acceptable in ecological and environmental terms. Our focus during the Examination will be on securing comprehensive mitigation and compensation for potential impacts.</p>	<p>The Applicant notes this comment and confirms it will continue to engage with NWT during the examination process, with the outcome documented within the SoCG with Norfolk Wildlife Trust [REP1-026].</p>
NWT4	<p>Page 2, Paras. 5 and 6</p> <p>We acknowledge that through field selection and design, significant effort has been made to avoid impacting protected wildlife sites in Norfolk.</p>	<p>The mitigation hierarchy is central to the design process of the Scheme (Design Principles, Parameters and Commitments [APP/5.8.2]) and has been informed by specific survey work, including desk study set out within the ES Appendix 7.2: Baseline Ecological Survey Report</p>



Reference Number	Comments	Applicant's Response
	<p>Norfolk Wildlife Trust seek assurances that a strict adherence to the Mitigation Hierarchy will be followed, including evidence that impacts are being avoided and enhancement is being delivered. Where mitigation, compensation, and enhancement are delivered – be it for Biodiversity Net Gain, landscape, or for targeted species – we seek to ensure the best possible outcomes for biodiversity.</p>	<p>[APP-148], and assessed separately, in full, within section 7.8 of the ES Chapter 7: Ecology and Biodiversity [REP1-034].</p>
NWT5	<p>Page 2, Paras. 7 and 8</p> <p>The proposed siting of substations and BESS within Fields 24 and 27 is of significant concern. These areas coincide with some of the highest levels of bat activity recorded on site, as identified in the Baseline Ecology Report (see our further comments relating to bats below).</p> <p>The requirement for new lighting in these locations, as well as increased noise, has the potential to cause adverse impacts on bats and other nocturnal wildlife. NWT strongly recommends that:</p> <ul style="list-style-type: none"> - Alternative locations for infrastructure requiring lighting are explored; and - The design prioritises avoidance of impacts on nocturnal species. 	<p>ES Appendix 7.2: Baseline Ecological Survey Report [APP-148] details the results of the bat surveys, which show levels of bat activity at monitored locations throughout the Site including SD1 to north east of Field 27 and SD2 to the east of Fields 24 and 27. Raised levels of Barbastelle registrations were recorded at location SD2 in particular (albeit all locations across the Site identified registrations by this species), which is likely to be of particular concern due to its rarer status. This species roosts in woodlands and typically forages close to tree canopies and woodland habitat, and at vegetation edges, and can forage over large areas. Therefore, the internal field areas within the Site are unlikely to be of value to this species, albeit the woodland and hedgerow corridors (which will be retained and strengthened) potentially provide foraging and commuting routes.</p> <p>The Applicant has established a set of global design principles, as set out in the Design Approach Document [AS-009 - AS-011]. Global Design Principle 2 addresses environmentally led design, under which the Applicant has developed a series of design principles applicable to the Scheme, which includes:</p> <ul style="list-style-type: none"> - 2.2 – Retain and enhance existing vegetation wherever possible to retain the fabric of the Site and aid integration of the Scheme into its context. <p>In accordance with this Design Principle, the existing hedgerows and woodland within the Scheme have been retained. The Applicant has also enhanced the existing features within the Site; measures include:</p> <ul style="list-style-type: none"> - 50m offsets associated with Fincham Drove and Petticoat Drove (and respective PRow South Acre RB6 and RB1), creating 50m wide routes through the Site, amplifying their role as key green infrastructure corridors and reinforcing their legibility; and - Creation of tree belts along the eastern and western edges of Field 27 which will provide connectivity between the woodland blocks. <p>These commitments are made to improve ecological habitat in these areas, as detailed in the oLEMP [REP1-060]. Additionally, commitments to ensure that a sensitive lighting strategy is developed as part of the detailed design to mitigate adverse impacts to bats have been made within the oCEMP [APP/7.6.2] and oOEMP [APP/7.8.2] as updated at Deadline 2. Due to the Applicant's commitments to improving habitat and mitigating impacts to bats, informed by the bat activity surveys detailed design of the Customer Substation and BESS and associated detailed lighting design will ensure that impacts on nocturnal species such as bats will be avoided.</p> <p>The siting of the Customer Substation, National Grid Substation and BESS in Fields 27 and 24 has been assessed on a worst-case basis in ES Chapter 7: Ecology and Biodiversity [REP1-034]. This assessment concluded that, following the implementation of the embedded mitigation and additional mitigation proposed, the Scheme will result in no adverse likely significant (in EIA terms) effects on bats. The key features identified to support bat commuting and foraging within the Site are the hedgerows and woodland edges. The Customer Substation and BESS will be located internally within fields and will not affect boundary features, including no significant light spill onto boundary features, and as such features of importance for bats will remain unaffected and connectivity maintained within the landscape. The oOEMP [APP/7.8.2] states that "A sensitive lighting strategy as part of the detailed OEMP will specify how this artificial lighting will be installed and used, which will serve to mitigate adverse impacts on ecological receptors which are adversely impacted by lighting, such as bats".</p>



Reference Number	Comments	Applicant's Response
		<p>The Applicant, therefore, does not consider that alternative locations for infrastructure requiring lighting are required to be explored, and considers that the design of the Scheme avoids significant impacts on nocturnal species.</p>
NWT6	<p>Page 3, Paras. 9 and 10</p> <p>Paragraph 7.7.25 (Chap 7, ES) states that no new lighting is proposed within the Solar PV Site areas but that new lighting will be “<i>limited to locations essential to security, namely the Customer Substation, National Grid Substation, and Battery Energy Storage System (BESS)</i>”. Currently, the BESS and substation are proposed to be located within fields 24 and 27. These are the fields with some of the highest recordings of bat activity.</p> <p>Ideally, we request that these areas of infrastructure are located elsewhere within the red-line boundary. If this is not possible, we seek assurance that appropriately designed buffers are put in place to ensure there are no negative impacts on bat species.</p>	<p>The Applicant notes the concerns raised in regard to the need to ensure that a detailed lighting assessment is conducted in order to ensure that lighting levels are appropriate for bats, including Barbastelle, given the raised levels of bat activity recorded to be associated with the boundary vegetation and woodland in proximity to the National Grid Substation, Customer Substation and BESS. The raised activity levels were associated with the woodland and boundary vegetation, which will be retained with increased buffers (in line with those discussed in relation to NE2-4 in this document). A detailed lighting scheme will be required as part of the oCEMP [APP/7.6.2] and oOEMP [APP/7.8.2] to ensure that the associated areas used by raised numbers of bats remain unlit, subject to which the location of the BESS National Grid Substation, and Customer Substation within the internal areas of Fields. Additionally, commitments to ensure that a sensitive lighting strategy is developed as part of the detailed design to mitigate adverse impacts to bats have been made within the oCEMP [APP/7.6.2] and oOEMP [APP/7.8.2] as updated at Deadline 2.</p>
NWT7	<p>Page 3, Para. 11</p> <p>It is not clear from the Figure shown in Appendix 1 of the Green Infrastructure Strategy Plan (Outline LEMP) where the BESS is to be situated. The yellow outline indicates “Permanent area for Green Infrastructure and National Grid Substation left after decommissioning” but there is nothing on the key relating to the BESS. We are also unclear from the key what the hatched area to the north of this area is?</p>	<p>Appendix 1 of the oLEMP [REP1-060] illustrates the distribution of green infrastructure proposals across the Site. This plan does not illustrate the distribution of built infrastructure such as Solar PV Arrays, BESS, National Grid and Customer Substations and Grid Connection Infrastructure. The location of these elements are secured on the Works Plan [APP-009], with an indicative layout shown in ES Appendix 5.1: Illustrative Technical Information [APP/6.4.3].</p> <p>The Applicant is unsure which hatched area is being referred to here and would welcome further engagement with NWT to provide clarity regarding this matter.</p>
NWT8	<p>Page 4, Para. 12</p> <p>Regarding the wider site, paragraph 7.8.47 (Chap 7, ES) notes that the Site includes a number of trees including those containing potential roosting features (PRF), predominantly located within the field boundary hedgerows and tree lines. It is stated that without further survey work to confirm the nature, species and status of any individual roosts, it is not possible to confirm the scale of importance of any individual roost (e.g. small roosts of common species would likely be of significance at the Site level, whereas large maternity roosts of rarer species would be of significance at larger scale). The ES goes on to note that none of the relevant trees or buildings will be affected as a result of construction activities, whilst buffers will be retained throughout construction activities such that regardless of the importance of any bats present, should individual roosts be present, following the embedded mitigation the magnitude of impact is considered to be negligible. However, we point out that Table 10 (Chap 7 ES), which outlines the embedded buffer distances, states that buffer sizes from bat roosts will be determined on a ‘case by case basis’. Thus, further information is required as if surveys are not being undertaken to determine significance of any roosts, how will these buffers be set and what will they be?</p>	<p>The Applicant notes this comment and the concerns raised in regard to how buffers relating to bat roosts will be determined. Given the nature of use (including removal of disturbance from agricultural activity and absence of lighting across the Solar PV Site), it is anticipated that the relevant buffers in relation to the individual habitat features offering potential roosting features such as veteran trees, other trees and woodland, would be sufficient in relation to any bat roosts that may be present (such that further roosting survey would be unnecessary, whilst the specific buffer distance would be dependent on the relevant receptor type and would therefore necessarily be determined on a case by case basis as set out). However, should an individual bat roost be identified at any time, further consideration would be given at that time, with any need for revised buffer distances confirmed on a case by case basis, as set out within Table 7-10 (and further confirmed at the corresponding Table 7-6) within the oLEMP [REP1-060].</p>
NWT9	<p>Page 4, Para. 13</p> <p>The River Nar SSSI is hydrologically linked to the Site via chalk aquifer baseflow and near-surface water supplies which drain into the River Nar SSSI. It is essential that robust pollution prevention measures are in place, especially during the construction period, as there is potential for chemical spills and contaminated surface water runoff to reach the River Nar SSSI via overland flows such as</p>	<p>Embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse, are secured within the oCEMP [APP/7.6.2]. ES Chapter 7: Ecology and Biodiversity [REP1-034] concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant (in EIA terms) effects.</p>



Reference Number	Comments	Applicant's Response
	ditches, which would degrade the habitats with adverse effects to the associated faunal and botanical assemblages of the River Nar SSSI.	
NWT10	<p>Page 4, Para. 14</p> <p>River Road Roadside Nature Reserve 033086 lies within the Site boundary and RNR U22086 is adjacent to it. There is an access track proposed to run immediately adjacent to RNR U33086 within field 10. We understand that access routes remain indicative at this stage and will therefore be determined at the detailed design stage. Appropriate buffers to safeguard and avoid adverse impacts on these locally important sites alongside ongoing management and monitoring measures, such as grassland management must be secured in the DCO.</p>	<p>River Road Roadside Nature Reserve U33086 is fully retained and enhanced within the Scheme, as detailed within the Biodiversity Net Gain Assessment Report [REP1-048]. Access routes shown remain indicative at this stage and will therefore be determined at the detailed design stage; nonetheless, safeguarding measures, such as appropriate buffers, are set out within the oCEMP [APP/7.6.2] to safeguard and avoid adverse impacts on this non-statutory (but locally important) designation and the adjacent RNR U22086. Ongoing management and monitoring measures, such as grassland management, for RNR 033086 are set out within the oLEMP [REP1-060].</p>
NWT11	<p>Page 4, Para. 15</p> <p>Paragraph 7.8.39 (Chap 7 ES) states that the woodland within the Site is of medium sensitivity and that there will be no direct permanent loss of woodland within the Order limits but will be limited to temporary impacts to vegetation within the woodland. We seek clarification as to what exactly this means?</p>	<p>The Applicant notes this comment and confirms that the relevant small areas of woodland within the Order limits that will be subject to temporary impacts are limited to very small areas mapped within the Works Plan [APP-009] for works in connection with connection to the overhead transmission electric line (Work No. 5).</p> <p>Any such works would involve no more than temporary vegetation management/trimming to allow for access and installation and connection to the existing overhead lines and would be consistent with the levels of management already in place periodically to maintain clearance from the existing overhead lines. More extensive vegetation works, clearance or removal of woodland are not required.</p> <p>Nonetheless, given the works would involve temporary vegetation works, this was necessarily identified and considered within ES Chapter 7: Ecology and Biodiversity [REP1-034]. The mapped areas identified within the Works Plan [APP-009] represent wider limits to allow for detailed design and as such affected areas would be even smaller than the mapped areas, whilst protective measures are secured within the oCEMP [APP/7.6.2] along with management secured under the oLEMP [REP1-060].</p>
NWT12	<p>Page 4, Para. 16</p> <p>NWT recommends that buffers around watercourses, ditches and ponds are increased to a minimum of 20 metres to reduce pollution risk and enhance biodiversity. We also recommend that the buffer distance around woodlands which support bats is also widened to a minimum of 30m.</p>	<p>Appropriate buffer distances have been identified in relation to specific habitats and landscape features (which will provide increased stable habitats in relation to the current intensive arable management), as detailed within ES Chapter 5: The Scheme [REP1-032]. No watercourses are present within or adjacent to the Site and therefore no specific buffer distance is required in regard to watercourses. Nonetheless, comments received from the EA (See EA9 in this document) requested that the Applicant commit to avoiding the riparian zone (defined as 10m from bank top under BNG guidance). Accordingly, in order to address this comment and ensure consistency, buffer zones of 10m from bank top have been updated within ES Chapter 7: Ecology and Biodiversity [REP1-034], at Deadline 1, and are referenced within the oCEMP [APP/7.6.2] and secured through Requirement 13 in Schedule 2 to the draft DCO [APP/3.1.2].</p> <p>In regard to ditches and hedgerows, the stated 10m buffer distance will provide increased widths of undisturbed habitat in relation to the existing position due to the maintenance and strengthening of permanent vegetation (as identified within the oLEMP [REP1-060], Biodiversity Net Gain Assessment Report [REP1-048] and secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.2]) replacing intensively managed arable land subject to frequent ploughing disturbance and chemical input. As such, the committed buffers represent betterment over the existing position and remain appropriate in relation to these habitats. In addition, further specific measures are also set out within the oCEMP [APP/7.6.2] and oDS [REP1-058] to safeguard these features against pollution during the course of the construction and decommissioning phases.</p>



Reference Number	Comments	Applicant's Response
NWT13	<p>Pages 4 and 5, Para. 17</p> <p>We note that new pylons will be installed and that this pylon route will run straight through the new area proposed for skylark and curlew mitigation. Installing pylons in an area proposed for curlew mitigation could significantly undermine the success of the area by causing issues of collision for adult birds and by providing perches for predators. Guidance is that new infrastructure such as pylons should not be placed in sensitive areas.</p>	<p>Proposed Skylark and Eurasian Curlew mitigation measures are set out within the ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149] incorporating a range of measures including the provision of the specific area of 8ha land managed as grassland for use by ground nesting birds including Eurasian Curlew, commensurate with the existing (low) levels of use of the Site recorded (1-2 pairs of Eurasian Curlew). Taken as a whole, incorporating the mitigation proposed, the impacts of the Scheme on ground nesting birds (in particular Skylark and Eurasian Curlew, including with reference to the proposed mitigation and compensation measures) have been specifically considered within section 7.8 of the ES Chapter 7: Ecology and Biodiversity [REP1-034], which concludes no significant effects are anticipated.</p>
NWT14	<p>Page 5, Para. 18</p> <p>We welcome the overall aim for retention of hedgerows. However, the ES should quantify the amount of hedgerows that will be lost due to widening for access; paragraph 7.8.41 of the Ecology chapter of the ES only states “any removal of hedgerows would be anticipated to be limited to minor widening”.</p>	<p>The Biodiversity Net Gain Assessment, set out within the Biodiversity Net Gain Assessment Report [REP1-048], takes into account the hedgerow removal proposed within the Scheme.</p>
NWT15	<p>Page 5, Para. 19</p> <p>The application site is within the vicinity of areas where stone curlew are confirmed to be breeding and parts of the site itself have suitable soils for this species to nest. Although the surveys submitted with the DCO application did not find stone curlew on the site, we strongly recommend extending the surveys outwards from the site for 500m (in areas where soils are suitable) as this species is highly susceptible to disturbance. In addition, we strongly recommend that surveys are undertaken during three breeding seasons to account for crop rotations.</p>	<p>It is acknowledged that crop rotations will affect the specific locations of any nesting activity within a particular year; however, in view of the size of the Site, varied crops were present (including those suitable for Stone-curlew) during the survey year such that any significant or sustained use of the Site would have been recorded. Natural England is also satisfied that there is no potential for Stone-curlew populations associated with the SPA to be affected. The Applicant, therefore, does not consider it necessary to extend the scope of the surveys.</p>
NWT16	<p>Page 5, Para. 20</p> <p>We are pleased that the outline Landscape and Ecological Monitoring Plan (LEMP) has been guided by the newly published LNRS. We welcome the statement that opportunities for green hay donor sites will be explored prior to the preparation of the detailed LEMP (paragraph 7.3.62 oLEMP) and would be happy to provide support with this.</p>	<p>The Applicant welcomes this comment.</p>
NWT17	<p>Page 5, Para. 21</p> <p>No information is given as to the exact number of habitat boxes (birds/bats) or log piles that will be provided. Clarification on this is required.</p>	<p>Detailed measures, such as the number and locations of habitat boxes and log piles, would be provided within the detailed Landscape and Ecological Management Plan which is to be produced substantially in accordance with the oLEMP [REP1-060] as secured by Requirement 7 of Schedule 2 of the draft DCO [APP/3.1.2].</p>
NWT18	<p>Page 5, Paras. 22 and 23</p> <p>We understand that The Drovers Project does not fall within mandatory Biodiversity Net Gain requirements, but that there are requirements and commitments for Biodiversity Net Gain that must be delivered. We welcome the ambition to provide a 23% uplift in on-site habitat units and a 59% uplift in hedgerow units.</p> <p>It is essential that best practice for Biodiversity Net Gain (BNG) is followed and that strong consideration for the Local Nature Recovery Strategy is included wherever post-development Biodiversity Net Gain units are delivered. The biodiversity value of such habitat can be further enhanced by looking to create habitat of a type or in a location to benefit key species.</p>	<p>The Applicant notes this comment and confirms that the Biodiversity Net Gain Assessment Report [REP1-048] was updated to take into account the published Norfolk LNRS (Countywide Nature Recovery Strategy) at Deadline 1.</p>



Reference Number	Comments	Applicant's Response
NWT19	<p>Page 5, Para. 24</p> <p>Paragraph 4.5.4 (BNG report) states that under the terms of the metric, the habitat units identify a “trading error” due to the loss of habitat units associated with “arable field margins game bird mix” habitat which will be lost under the Scheme. Should it not be possible to address the required units within the Site, any further requirement will need to be delivered off-site in order to ensure that the trading requirements can be met (as acknowledged in para 4.5.5 BNG Report).</p>	<p>The trading rules have been addressed within the updated Biodiversity Net Gain Assessment Report [REP1-048] submitted at Deadline 1 and, as such, no off Site delivery will be required.</p>
NWT20	<p>Pages 5 and 6, Paras. 25 and 26</p> <p>Under BNG’s additionality rules, habitat measures delivered to mitigate or compensate for impacts to protected sites and species can only count towards, and not beyond, no-net-loss, for example the mitigation measures that are proposed for skylark and curlew. To ensure additionality of the Project’s BNG, habitat created or enhanced to meet statutory mitigation or compensation for impacts to protected sites or species should be clearly identified in the BNG assessment.</p> <p>We seek clarification that the Habitat Restoration and Substitution 2-Year Rule from the Metric has been adhered to. The approach to replacing habitat that cannot be restored within two years aligns with the strict Statutory Biodiversity Metric trading rules. If habitat is lost, it must be compensated with "like-for-like" or "like-for-better" quality habitats. The 2-Year Timeframe accounts for the time it takes for new habitat to reach its target condition. If a habitat cannot reach a suitable condition quickly, this delay increases the biodiversity unit deficit, reinforcing the need for immediate, high quality replacement or off-site alternatives.</p>	<p>The Applicant notes the comment in regard to BNG additionality, which is in accordance with DEFRA guidance. The Biodiversity Net Gain Assessment Report [REP1-048] necessarily provides an objective view of the change in ecological value of the Site under the terms of the metric and must reflect the change in value of habitats throughout the Site area regardless of the purpose. Nonetheless, whilst habitats providing mitigation or compensation in respect of species such as Skylark and Eurasian Curlew contribute to the overall BNG, significant new habitats will be created throughout the Site (as identified within the oLEMP [REP1-060] and Biodiversity Net Gain Assessment Report [REP1-048] and secured through Requirements 7 and 9 in Schedule 2 to the draft DCO [APP/3.1.2]), representing the majority of BNG contribution which therefore provide net gains in excess of 10%, such that the guidance in regard to additionality will be fully met. For further clarity, in line with the comments made and as part of the updated Biodiversity Net Gain Assessment Report [REP1-048] submitted at Deadline 1, habitats created or enhanced to meet mitigation or compensation requirements for protected species have been specifically identified within the comments section associated with each habitat line.</p> <p>The Applicant confirms that the Habitat Restoration and Substitution 2-Year Rule has been adhered to where appropriate.</p>
NWT21	<p>Page 6, Para. 27</p> <p>We note that some of the fields have been used for pig rearing. It is important that this is taken into account when planning habitat creation schemes as this will effect habitat creation possibilities.</p>	<p>The habitats proposed within existing internal agricultural areas, including those that have been used by pigs, are not reliant on specific baseline conditions and as such are considered readily achievable. Therefore, the Applicant confirms that the previous agricultural use of the fields within the Site has been taken into account.</p>
NWT22	<p>Page 6, Paras. 28 - 30</p> <p>NWT strongly recommends that the Landscape and Ecology Management Plan is secured for a minimum of 30 years, or for the full operational lifetime of the project. Furthermore, newly created or enhanced habitats should be retained beyond decommissioning, delivering a permanent net gain.</p> <p>Section 7.5 of the oLEMP outlines plans for long-term monitoring. We strongly recommend that bat surveys are included within the monitoring strategy.</p> <p>We welcome the concept introduced in paragraph 7.5.4 of the oLEMP which discusses opportunities to link up with academic research bodies, NGOs etc and recommend that this is taken forward.</p>	<p>The Applicant can confirm that the measures set out within the oLEMP [REP1-060] are secured for both the construction and operational phases of the Scheme, which is for 60 years. Section 7.5 of the oLEMP [REP1-060] details the outline ecological monitoring strategy. The outline ecological monitoring strategy includes the details of the habitat, botanical, soil, and bird monitoring proposed during the operational phase of the Scheme. It also acknowledged that additional survey elements may be included in the detailed monitoring strategy including bat surveys and opportunities to link up with organisations such as Norfolk Wildlife Trust to carry out further monitoring.</p> <p>The Applicant welcomes this comment regarding the measures set out in paragraph 7.5.4 of oLEMP [REP1-060].</p>
NWT23	<p>Page 6, Paras. 31 and 32</p> <p>Norfolk Wildlife Trust will engage with the Examination primarily via the submission of Written Representations and the agreement of a Statement of Common Ground, although we may wish to attend specific hearings. This</p>	<p>The Applicant welcomes this comment and looks forward to continued engagement with NWT.</p>



Reference Number	Comments	Applicant's Response
	<p>Statement clearly sets out our areas of interest and offers more detailed comment, which we will look to update if required.</p> <p>Norfolk Wildlife Trust look forward to continued discussions with the developer on the above topics and hope to see genuine positives for biodiversity in Norfolk delivered as part of this project.</p>	
NWT24	<p>Page 7, Paras. 1 and 2</p> <p>Norfolk Wildlife Trust (NWT) supports the transition to renewable energy and recognises the role of solar power in helping the UK achieve net-zero carbon emissions. However, its support for the proposed Drovers Solar Farm is conditional on the project avoiding harm to wildlife, delivering meaningful biodiversity gains, contributing to nature recovery, and providing long-term environmental benefits.</p> <p>While NWT acknowledges efforts made by the developer to avoid impacts on protected wildlife sites, it considers that further information, design refinement, and stronger ecological safeguards are required before the project can be considered environmentally acceptable. The Trust emphasises the importance of adhering to the mitigation hierarchy, prioritising impact avoidance before mitigation or compensation measures are considered.</p>	<p>The response at NWT2 above responds to the matters of avoiding harm to wildlife; delivering meaningful biodiversity gains; contributing to nature recovery; and providing long-term environmental benefits.</p> <p>With regards to adhering to the mitigation hierarchy, as outlined within the previous response NWT5 within Table 4.4 of Applicant's Response to Relevant Representations [REP1-067], the mitigation hierarchy is central to the design process of the Scheme (Design Principles, Parameters and Commitments [APP/5.8.2]) and has been informed by specific survey work, including desk study set out within the ES Appendix 7.2: Baseline Ecological Survey Report [APP-148], and assessed separately, in full, within Section 7.8 of ES Chapter 7: Ecology and Biodiversity [REP1-034].</p>
NWT25	<p>Page 7, Para. 3</p> <p>A key concern relates to the proposed location of the Battery Energy Storage System (BESS) and substations in Fields 24 and 27, which support some of the highest levels of bat activity recorded on site. NWT is concerned that lighting and noise associated with this infrastructure could adversely affect bats and other nocturnal wildlife. It recommends relocating these facilities where possible or implementing robust mitigation and buffer measures. The Trust also seeks greater clarity on infrastructure locations and bat protection measures, particularly regarding how buffer distances around potential bat roosts will be determined.</p>	<p>See above in relation to comment NWT5.</p> <p>ES Appendix 7.2: Baseline Ecological Survey Report [APP-148] details the results of the bat surveys, which show levels of bat activity at monitored locations throughout the Site including SD1 to north east of Field 27 and SD2 to the east of Fields 24 and 27. Commitments have been made to improve ecological habitat in these areas, as detailed in the oLEMP [REP1-060]. Additionally, commitments to ensure that a sensitive lighting strategy is developed as part of the detailed design to mitigate adverse impacts to bats have been made within the oCEMP [APP/7.6.2] and oOEMP [APP/7.8.2]. Due to the Applicant's commitments to improving habitat and mitigating impacts to bats, the bat activity surveys were not an influence on substation location in the design evolution process.</p> <p>The Design Principles, Parameters and Commitments [APP/5.8.2] confirm that "<i>The Solar arrays will not be lit during the operational phase</i>", such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. Measures to control lighting and prevent adverse effects are set out within the oCEMP [APP/7.6.2]. Therefore, the Applicant is confident that the design of the Scheme will prioritise avoidance of impacts on nocturnal species.</p> <p>The siting of the Customer Substation, National Grid Substation and BESS in Fields 27 and 24 has been assessed on a worst-case basis in ES Chapter 7: Ecology and Biodiversity [REP1-034] and concluded that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects on bats, and as such, consideration of alternative locations for this infrastructure is not necessary.</p>
NWT26	<p>Page 7, Para. 4</p> <p>NWT highlights the need to protect the River Nar Site of Special Scientific Interest (SSSI), which is hydrologically connected to the site. It stresses that strong pollution prevention measures must be in place during construction to prevent contaminated runoff or chemical spills reaching the river and damaging sensitive habitats.</p>	<p>The Applicant refers to its response to NWT9 above.</p>



Reference Number	Comments	Applicant's Response
NWT27	<p>Page 7, Para. 5</p> <p>Concerns are also raised regarding impacts on local Roadside Nature Reserves, woodland habitats, and watercourses. NWT recommends wider buffer zones, including at least 20 metres around water bodies and 30 metres around woodland supporting bats. Clarification is requested regarding the extent of temporary impacts to woodland vegetation.</p>	<p>The Applicant refers to its responses to NWT10 and NWT11 above.</p>
NWT28	<p>Page 7, Para. 6</p> <p>The Trust identifies several species-specific concerns. It warns that proposed pylons crossing land intended for skylark and curlew mitigation could reduce the effectiveness of these measures by increasing collision risks and providing perches for predators. It also requests more information on hedgerow losses associated with access widening and recommends additional stone curlew surveys, extending beyond the site boundary and covering multiple breeding seasons due to the species' sensitivity to disturbance.</p>	<p>The Applicant refers to its responses to NWT13, NWT14 and NWT15 above.</p>
NWT29	<p>Page 7, Para. 7</p> <p>NWT welcomes the project's biodiversity enhancement ambitions, including proposed increases in habitat and hedgerow units. However, it stresses that Biodiversity Net Gain (BNG) must align with best practice and the Local Nature Recovery Strategy. Habitat created for mitigation of protected species impacts should not also be counted towards BNG targets. The Trust also seeks confirmation that biodiversity metric rules relating to habitat replacement and restoration timescales have been properly applied and notes that previous pig-rearing activities on some fields may affect habitat creation opportunities.</p>	<p>The Applicant refers to its responses to NWT18 – NWT21 above.</p>
NWT30	<p>Pages 7 and 8, Para. 8</p> <p>Finally, NWT strongly supports long-term habitat management and monitoring. It recommends that the Landscape and Ecology Management Plan be secured for at least 30 years, or ideally for the full operational life of the project, with newly created habitats retained beyond decommissioning. The Trust also advocates for ongoing bat monitoring and collaboration with academic and conservation organisations to maximise biodiversity outcomes.</p>	<p>The Applicant refers to its response to NWT22 above.</p>
NWT31	<p>Page 8, Para. 1</p> <p>Overall, NWT supports renewable energy development in principle but seeks stronger ecological protections and clearer commitments to ensure The Drovers Solar Farm delivers genuine and lasting benefits for biodiversity in Norfolk.</p>	<p>The Applicant notes this comment and has sought to provide clarity regarding protections and commitments in the responses set out within this document. The Applicant has committed to offsets of environmental features as set out within Design Principles, Parameters and Commitments [APP/5.8.2] along with the outline management measures, which are appropriate for this stage of the Scheme, within the oLEMP [REP1-060]. Notwithstanding this, the Applicant would welcome further engagement with NWT regarding these matters through the SoCG with Norfolk Wildlife Trust [REP1-026].</p>
<p>CPRE Norfolk – Written Representation [REP1-085]</p>		
CPRE1	<p>Page 1, Paras. 2 and 3</p> <p>CPRE Norfolk supports the transition to renewable energy and recognises the urgent need to decarbonise electricity generation in order to address climate change. However, this support is conditional upon renewable energy developments being appropriately scaled and sensitively located so as to avoid</p>	<p>The Applicant's response to CPRE1 within Table 4.2 of the Applicant's Response to Relevant Representations [REP1-067] details how the Planning Statement [REP1-012] sets out the rigorous process that the Applicant undertook to select the Site including the consideration of environmental constraints. This is detailed within Appendix 1: Site Evaluation Report to the Planning Statement [REP1-012].</p>



Reference Number	Comments	Applicant's Response
	<p>unacceptable harm to the countryside, landscape character, agricultural land, biodiversity, heritage assets, and rural communities.</p> <p>In CPRE Norfolk's view, The Drovers Solar Farm proposal fails to strike an appropriate balance between renewable energy generation and environmental protection. The proposal represents an industrial-scale transformation of open countryside and would result in significant and unjustified adverse effects which have not been adequately mitigated.</p>	<p>The ES, submitted as part of the DCO Application, considers the likely significant effects of the Scheme on the environment, including effects on landscape, agricultural land, heritage, ecology and the wider community.</p> <p>As outlined in the Applicant's response to CPRE1 within Table 4.2 of the Applicant's Response to Relevant Representations [REP1-067], in the Statement of Need [APP-042], it is explained that there is a Critical National Priority (CNP) for the delivery of large-scale solar generation projects such as the Scheme, and that large-scale projects are needed to meet Government's aim for a clean power system from 2030. It is in the context of the urgent requirement for an unprecedented capacity of new solar schemes to come forward, that the Applicant is bringing forward the Scheme.</p> <p>As summarised in Planning Statement [REP1-012], there are no residual impacts as a result of the Scheme which would outweigh the need or other benefits, nor are there any residual impacts which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats, the achievement of net zero, offshore navigation, flood and coastal erosion.</p> <p>Furthermore, any adverse effects as a result of the Scheme are outweighed by the substantial benefits that are delivered. It is considered that, even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted.</p>
CPRE2	<p>Page 1, Para. 4</p> <p>The proposal is for a new solar farm on 1,130 hectares of mainly arable agricultural land, with photovoltaic panels spanning across the operational area (825 ha), as well as associated infrastructure, including a substation, Battery Energy Storage System (BESS), fencing, and biodiversity and landscape mitigation. The proposed scheme sits within farmland with open, expansive views, mature trees, scattered woodlands, and a patchwork of arable fields. The area has a rural, agricultural feel with a low density of settlements.</p>	<p>The Applicant notes that the Order limits as shown on ES Figure 3.2: The Order Limits [APP-070] comprise a total area of approximately 840 (ha of land, with the area of the Solar PV being approximately 608.1ha. The full overview of what is proposed on the land included within the Order limits is detailed within paragraph 3.2.3 of ES Chapter 3: Order Limits and Context [REP1-030].</p>
CPRE3	<p>Page 1, Para. 5</p> <p>Whilst CPRE Norfolk generally supports solar generation of electricity, particularly when it is situated on south-facing roof spaces, this needs to be weighed against any harms, so that the benefits can be justified. In this case we feel that this is not the case due to the following reasons.</p>	<p>The Applicant's response to CPRE6 within Table 4.2 of the Applicant's Response to Relevant Representations [REP1-067] has addressed roof top solar. The other matters raised in the current response are responded to below.</p>
CPRE4	<p>Pages 1 and 2, Para. 7</p> <p>The National Planning Policy Framework (NPPF) requires planning decisions to contribute to and enhance the natural and local environment, including by protecting valued landscapes and recognising the intrinsic character and beauty of the countryside. While the NPPF supports renewable energy development, it also makes clear that proposals should be acceptable in planning terms and not result in unacceptable impacts. The scale and siting of the Drove Solar Farm would result in significant harm to the open rural character of this part of Norfolk, contrary to these core principles.</p>	<p>ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. The Site does not comprise a valued landscape. The methodology for assessing landscape value is detailed within Section 6.5 of ES Chapter 6: Landscape and Visual [AS-016]. Definitions of varying levels of landscape value are detailed within Table 6-2.</p> <p>The assessment concludes that there would be no potential long term significant (in EIA terms) adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p> <p>As outlined within paragraph 8.3.177 of the Planning Statement [REP1-012], with the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's</p>



Reference Number	Comments	Applicant's Response
		<p>benefits and needs case in accordance with Paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.</p> <p>The Applicant also refers to Table 4 of the Policy Compliance Document [REP1-014] for details of the Scheme's compliance with the NPPF.</p>
CPRE5	<p>Page 2, Para. 2 and 4</p> <p>The proposed solar farm is located on greenfield agricultural land. National planning guidance makes clear that the use of Best and Most Versatile (BMV) agricultural land should be avoided for large-scale solar development. (...)</p> <p>CPRE Norfolk is concerned that through providing solar energy this land is then largely lost to food production.</p> <p>The proposal would lead to the loss of good quality agricultural land. Natural England identifies the sites as grade 3 and 4 agricultural land, presently used for growing arable commodity crops. Where solar farms are granted permission CPRE Norfolk would expect these to be sited on poorer quality land. Where proposals affect agricultural land, they should be refused where the land is graded at 1, 2 or 3a, in line with footnote 65 of the NPPF (Dec 2024)</p>	<p>Footnote 65 of the NPPF (2024) states that “Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.” This, therefore, does not prevent solar farms on BMV land; instead, it encourages applicants to consider agricultural land value. The Applicant's response to CPRE5 within Table 4.2 of the Applicant's Response to Relevant Representations [REP1-067] details how agricultural land was a key factor within the Applicant's site selection process. The Policy Compliance Document [REP1-014] demonstrates the Scheme's compliance with the NPPF and the relevant NPS policy tests on the use of best and most versatile agricultural land.</p> <p>ES Chapter 11: Soils and Agriculture [AS-018] concludes that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production. There is no policy that requires agricultural land to be farmed for food production. As noted in paragraph 11.8.100 of ES Chapter 11: Soils and Agriculture [AS-018], as of 1 June 2025 some 444,000 ha of arable land in the UK was in agri-environmental land use (i.e. funded for non-production uses).</p>
CPRE6	<p>Page 2, Paras. 7 and 9</p> <p>(...)As the majority of the development is of BMV land, this development is well beyond the 20ha threshold for 'smaller losses' of BMV land, and is unnecessary as there are other sites of lower grade agricultural, or non-agricultural land available, if not in the immediate vicinity, certainly in the wider area, not to mention the many available roof spaces on current or planned residential and commercial buildings. The introduction of grazing sheep would not be an adequate or appropriate use of BMV land given the need to maximise food production.</p> <p>The scheme provides no credible evidence that the use of this agricultural land is essential, or that alternative brownfield or lower-grade land has been considered. If the land is found to be Grade 2 and 3a or better, it qualifies as BMV, and its permanent loss would be contrary to national guidance.</p>	<p>ES Appendix 11.2: Agricultural Land Classification [APP-168] was carried out under the Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land, Ministry of Agriculture Fisheries and Food (1988). The ALC Guidelines were updated in December 2025 (Department for Environment, Food and Rural Affairs, ALC of England and Wales: Guidelines for grading the quality of agricultural land) but this updated and clarified guidance but did not change the ALC methodology. The ALC results remain valid therefore. +The ALC results are therefore detailed and reliable. The assessment of impacts and effects has followed the evaluation of significance set out in the ES, including the fact that losses of more than 20 ha are defined as significant. The assessment identifies the thresholds and sensitivities, and any loss (permanent loss or downgrading) of more than 20ha of BMV is a significant effect. The methodology is robust.</p> <p>The Scheme involves 54% land of BMV quality. As set out in ES Chapter 11: Soils and Agriculture [AS-018], based on the available ALC information at the time of the ES, the Site was some of the poorest land within Norfolk (see Plates 11-1 and 11-2, and paragraphs 11.8.94 to 11.8.97).</p> <p>Policy does not govern the way agricultural land is used. The amount of BMV land that will be lost is 8.8 ha, including 3.7 ha for woodland planting (paragraph 11.10.3).</p> <p>Furthermore, the Applicant's response to CPRE6 above addresses how agricultural land has been fully considered within the Applicant's site selection process and policy assessment. It also outlines that the ES concludes that there will be no significant adverse effects on local and national land-based economy and food production as a result of the Scheme.</p>
CPRE7	<p>Page 3, Paras. 1, 3 and 4</p> <p>NPPF Paragraph 187(a) requires that decisions protect and enhance 'valued landscapes' and the natural environment. The proposed development introduces</p>	<p>ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. The Site does not comprise a valued landscape. The methodology for assessing landscape value is detailed within Section 6.5 of ES Chapter 6: Landscape and Visual [AS-016]. Definitions of varying levels of landscape value are detailed within Table 6-2.</p>



Reference Number	Comments	Applicant's Response
	<p>significant industrial infrastructure, including extensive arrays of panels, fencing, access roads, and substations, in a rural and open landscape.</p> <p>The Breckland Landscape and Settlement Character Assessment identifies a key landscape type relevant to The Drove Farm. The solar farm lies within the Wayland Plateau Farmland landscape type. Characterized by gently rolling farmland with open, expansive views, mature trees, scattered woodlands, and a patchwork of arable fields. The area has a rural, agricultural feel with a low density of settlements.</p> <p>The proposed scale and extent of the solar array will create a significant alteration to the open rural character, especially from nearby public rights of way and minor roads. The large-scale installation of solar panels across thousands of acres introduces an extensive and visually distinct feature. The uniform, reflective nature of PV panels is incongruous with the more organic patterns of field and hedgerow found here. The reflective surfaces and the sheer extent of the development would contrast with the traditional farmland. This could significantly alter the sense of openness and rural tranquility valued in the countryside.</p>	<p>The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p> <p>The rural 'tranquillity' and undeveloped nature of the Site have been identified in the baseline and have been considered when determining landscape value and have influenced sensitivity conclusions through an assessment of landscape value included within Table 3 of ES Appendix 6.5: Evaluation of Landscape Value [APP-143]. This value assessment considered a number of factors such as Natural Heritage, Cultural Heritage, Landscape Condition, Associations, Distinctiveness, Recreational, Perceptual (scenic), Perceptual (wilderness and tranquillity) and Functional. The value rating for these factors varied between local value, community value and limited value – reflecting the presence and value of respective qualities within the Site and its context. The overall judgement for the value of a landscape receptor, such as an LCA of community value, takes account of the different value ratings ascribed to the factors referred to above. These judgements are balanced and representative of the qualities highlighted within the assessment.</p> <p>As outlined within paragraph 8.3.177 of the Planning Statement [REP1-012], given the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.</p>
CPRE8	<p>Page 3, Para. 5 and 6</p> <p>NPPF Paragraph 193 adds that planning permission should be refused for development resulting in significant harm to a landscape which cannot be adequately mitigated.</p> <p>This development would result in substantial visual harm. Views from nearby villages and public footpaths will be affected reducing the visual quality of the countryside. No robust Landscape and Visual Impact Assessment (LVIA) appears to accompany the proposal, and any claimed mitigation through screening or planting is unlikely to reduce the visual harm during the 60-year operational period. Furthermore much of the mitigation on offer, e.g. planting hedgerows, would destroy current open attractive views along footpaths and minor roads.</p>	<p>It is of note that paragraph 193 of the NPPF relates to biodiversity and protected habitats instead of landscape matters. Paragraph 193 of NPPF states that local planning authorities should refuse a planning application where "<i>significant harm to biodiversity resulting from a development cannot be avoided</i>", where "<i>development on land within or outside of a Site of Special Scientific Interest</i>" is likely to result in an adverse effect on it and where development would result in the "<i>loss or deterioration of irreplaceable habitats.</i>" Development "<i>whose primary objective is to conserve or enhance biodiversity should be supported</i>". However, the Applicant does consider that it has fully considered the impacts on the landscape character and visual receptors from the Scheme.</p> <p>ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. The Site does not comprise a valued landscape. The methodology for assessing landscape value is detailed within Section 6.5 of ES Chapter 6: Landscape and Visual [AS-016]. Definitions of varying levels of landscape value are detailed within Table 6-2. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. Mitigation for LVIA involves planting throughout the Site which is embedded into the Scheme and secured in the design, meaning additional mitigation is not available. No additional mitigation measures for the Scheme are proposed.</p> <p>The scope of the visual assessment included viewpoints and Visual Receptor Groups (VRGs) from surrounding villages, PRow, roads and residential dwellings – these are shown on ES Figure 6.7: Visual Receptor Groups [APP-084]. ES Chapter 6: Landscape and Visual [AS-016] details any adverse visual effects associated that could be experienced by visual receptors within 3km of the Site. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area.</p>



Reference Number	Comments	Applicant's Response
		<p>A robust and full Landscape and Visual Impact Assessment has been undertaken and is included in ES Chapter 6: Landscape and Visual [AS-016].</p> <p>The Applicant disagrees that the proposed mitigation planting is unlikely to reduce the visual harm. The LVIA and accompanying visualisations demonstrate the effectiveness of the proposed mitigation planting through a reduction in potential visual effect from construction phase through to long term operation phase.</p> <p>Some areas of the Site are generally visually enclosed, particularly where landform is relatively flat and/or gently rolling with field boundaries vegetated by existing mature trees, hedgerow and woodland, as noted within the LVIA baseline assessment. In these areas, internal Site views from roads and PRow are short distance and mostly linear along vegetated routes, with landscape features either side. It is also noted that there are stretches of roads and PRow where hedgerows do not exist and/or have gaps within them, which allows intermittent mid to longer distance views across adjacent agricultural fields. Alongside PRow, the proposed maintenance and management of hedgerow heights at 3m serves to not only screen views towards the Scheme from PRow within the Site, but also reinforces the existing character of the landscape within the Site and host landscape character area. Many of the PRow are lined with existing hedgerow, trees, scrub and woodland blocks; the mitigation planting proposals use these same planting typologies to ensure the mitigation is in-keeping with the local landscape and therefore restores and reinforces the landscape character of the Site.</p> <p>This strategy serves to re-establish their historic character with established hedgerow and trees aligning them. The mitigation planting also serves to screen views towards the Scheme, limiting potentially significant visual effects in the long term and generally leading to a restoration and re-establishment of the landscape fabric that once aligned these routes.</p> <p>With regard to 'open attractive views', these exist from some locations, such as those from PRow South Acre RB7, looking across the Nar Valley northwards, and are retained as part of the Scheme.</p> <p>It is therefore considered that the mitigation hierarchy has been applied throughout the design and development of the Scheme, and the landscape and visual impacts have been minimised as far as practicable. Paragraph 5.10.35 of NPS EN-1 confirms that "<i>the scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project</i>".</p> <p>As outlined within paragraph 8.3.177 of the Planning Statement [REP1-012], given the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.</p>
CPRE9	<p>Page 3, Para. 7</p> <p>In addition the proposal does not recognise 'the intrinsic character and beauty of the countryside' as required by NPPF (Dec 2024) para. 187b. Although the proposal does include planting, screening, minimal lighting etc. it still proposes to alter the intrinsic character of the countryside site through the imposition of solar arrays and several alien structures. Although the claim is these will be temporary, the reality is that this development would lead to these harms being felt for 60 years, plus the time taken to construct and decommission the site (if indeed it was decommissioned at that point.)</p>	<p>ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme during construction, operation and decommissioning phases. This assessment considers all elements of the Scheme detailed in ES Chapter 5: The Scheme [REP1-032], such as Solar PV Arrays, BESS, Customer and National Grid Substations and Grid Connection Infrastructure.</p> <p>As stated in NPPF paragraph 187, the "<i>intrinsic character and beauty of the countryside</i>" was recognised in ES Chapter 6: Landscape and Visual [AS-016], supporting ES Appendix 6.5 Evaluation of Landscape Value [APP-143] and ES Appendix 6.6: Extracts from Relevant Landscape Character Assessments [APP-144].</p> <p>The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape</p>



Reference Number	Comments	Applicant's Response
		<p>character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p> <p>As outlined within paragraph 8.3.177 of the Planning Statement [REP1-012], given the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.</p>
CPRE10	<p>Page 3, Paras. 8 and 9</p> <p>Paragraph 198 of the NPPF that relates to development being appropriate for its location, referring specifically to noise and light pollution and draws attention to intrinsically dark landscapes and nature conservation. This stands in line with the Norfolk County Council Environmental Lighting Zones Policy which identifies the site in an area of Rural Dark Landscape and therefore requires protection.</p> <p>This proposal would introduce industrial-scale infrastructure into a rural, visually sensitive setting, resulting in significant and irreversible landscape harm. This is not consistent with the aim to protecting valued landscapes under the NPPF and other planning guidance.</p>	<p>Regarding operational lighting, the Scheme would not conflict with NPPF paragraph 198 (c). The Scheme limits light spillage and eliminates all unnecessary forms of artificial outdoor lighting, as defined in the oOEMP [APP/7.8.2].</p> <p>The Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion sensing lighting and be used only for security and maintenance purposes as explained in oOEMP [APP/7.8.2] and ES Chapter 5: The Scheme [REP1-032]. Lighting is not required within the Solar PV Site during the operation phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. Temporary Site lighting would be used during construction to enable safe working during construction in hours of darkness or where natural lighting is unable to reach (such as sheltered/confined areas). Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the construction compounds while construction is underway.</p> <p>The Design Principles, Parameters and Commitments [APP/5.8.2] confirm that “the Solar arrays will not be lit during the operational phase”, such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the site, whilst measures to control lighting and prevent adverse effects (including as secured by Requirement 13 of the draft DCO [APP/3.1.2]) are set out within the oCEMP [APP/7.6.2].</p> <p>ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. The Site does not comprise a valued landscape. The methodology for assessing landscape value is detailed within Section 6.5 of ES Chapter 6: Landscape and Visual [AS-016]. Definitions of varying levels of landscape value are detailed within Table 6-2.</p> <p>The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p>
CPRE11	<p>Page 3, Para. 10 and Page 4, Paras. 1 and 2</p> <p>National planning law expects that renewable energy infrastructure should be developed in the most appropriate locations, balancing environmental, agricultural, and visual impacts. However: There is no evidence that alternative non agricultural sites have been assessed in a meaningful sequential approach. CPRE Norfolk is not satisfied that the application robustly justifies the use of productive agricultural land, nor that alternative locations—such as previously</p>	<p>The Applicant's previous responses to CPRE5 and CPRE6 within Table 4.2 of the Applicant's Response to Relevant Representations [REP1-067] addressed the site selection process and the consideration of other forms of solar PV. The Applicant supports the development of rooftop solar but alongside, not instead of, large-scale ground mounted schemes. Paragraph 4.3.37 of ES Volume 1, Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] sets out that the use of commercial rooftops was not considered as an alternative to the Scheme, given that rooftop solar alone would not be able to meet the scale and pace required of new capacity growth to meet the UK's needs. ES Volume 1, Chapter 4: Reasonable Alternatives and Design</p>



Reference Number	Comments	Applicant's Response
	<p>developed land, commercial rooftops, car parks, or less sensitive sites—have been properly explored.</p> <p>Recent studies, including by SolarQ UK, show that the UK's solar targets can be met without sacrificing productive farmland, by prioritising rooftops, car parks, and brownfield sites. The developer has not justified why these alternatives have been dismissed.</p> <p>The way forward must be based on the potential to harness technological advances in solar energy production which have minimal impacts on the landscape. It will become possible to “harvest” solar power from all manner of artificial surfaces including road surfaces, warehouse and factory roofs etc and these methodological breakthroughs, together with other new approaches such as producing hydrogen from plastic waste, will ultimately make farmland consuming, landscape destroying commercial photovoltaic solar farms redundant. CPRE Norfolk wants to see more effort, ingenuity and resources put into these new methods of producing renewable energy and, once again, when and where possible, with maximum input from the local community. Research carried out by the UCL Energy Institute for CPRE confirmed that installing solar panels on existing rooftops and other land such as car parks could provide at least 40-50GW of solar energy in England by 2035 and by 2050, with further investment, that there is potential to generate 117GW of low carbon electricity from roofs and other developed spaces - i.e. well in excess of the government's 2035 national target.</p>	<p>Evolution [APP-053] also sets out how previously developed land has been considered in the search for alternative sites for the Scheme through a review of the relevant local brownfield land registers. It concludes that no brownfield land sites are available at a sufficient size to accommodate the Scheme, either individually or in combination with other sites.</p> <p>ES Appendix 12.2: Flood Risk Assessment [APP/6.4.2] sets out the Scheme's evidence and compliance with the sequential test at both the site selection and site-level processes. Furthermore, paragraph 6.1.9 of Appendix 1: Site Evaluation Report of the Planning Statement [REP1-012] sets out that the Applicant's site selection process and evaluation accords with the approach to the consideration of alternatives set out in Section 2.10 of NPS EN-3. The Applicant considers that it has demonstrated compliance with the relevant site selection criteria set out in NPS EN-1, NPS EN-3, and NPS EN-5. Although the Scheme does include agricultural land, the Applicant has sought to minimise the amount of BMV and agricultural land by adopting a sequential approach in its site selection and can justify its inclusion given the lack of a suitable alternative on brownfield land as set out in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] and the temporary nature of the Scheme as set out in ES Chapter 11: Soils and Agriculture [AS-018]. Paragraph 9.4.15 of the Planning Statement [REP1-012] sets out the use of agricultural and BMV land within the cumulative impacts section of the planning balance.</p>
CPRE12	<p>Page 4, Paras. 3 – 5</p> <p>The NPPF requires planning authorities to consider the cumulative impacts of development.</p> <p>The proposed solar farm adds to a growing number of renewable energy developments in the region, placing pressure on the landscape, wildlife corridors and rural communities. The cumulative negative effect of increasing numbers of solar farms in the wider area should be recognized.</p> <p>CPRE has consistently advocated a “rooftops first” approach to solar deployment. Large-scale ground-mounted solar should not be treated as the default option where less harmful alternatives exist. The application fails to demonstrate that a sequential approach to site selection has been applied, contrary to the principle of sustainable development. Research by UCL for CPRE demonstrates that 117GW of solar energy is obtainable from roofs and artificial surfaces by 2050.</p>	<p>The Applicant's previous responses to CPRE4 and CPRE6 within Table 4.2 of the Applicant's Response to Relevant Representations [REP1-067] addressed how the Applicant has fully considered cumulative effects and the consideration of other forms of solar PV.</p>
CPRE13	<p>Page 4, Para. 6</p> <p>National policy stresses the importance of temporary and reversible use of land for solar development. However, the proposal lacks a clear decommissioning plan, long-term land stewardship strategy, or legally enforceable mechanism to ensure restoration of land to its former agricultural use after the project's lifespan.</p>	<p>The Applicant does not agree that “<i>the proposal lacks a clear decommissioning plan</i>”. As is common practice across made solar DCOs, Requirement 20 of Schedule 2 of the draft DCO [APP/3.1.2], states that:</p> <ul style="list-style-type: none"> • no later than ten weeks prior to the intended date of decommissioning of any part of the Scheme, the Applicant must submit to the relevant planning authority for that part a decommissioning strategy for approval • that decommissioning strategy must be substantially in accordance with the outline decommissioning strategy and must include a timetable for its implementation



Reference Number	Comments	Applicant's Response
		<ul style="list-style-type: none"> no decommissioning works must be carried out until the relevant planning authority has approved the decommissioning strategy submitted in relation to those works; and that decommissioning strategy must be implemented as approved. <p>There is, therefore, a clear mechanism in the draft DCO [APP/3.1.2] (being a statutory instrument, the breach of which is a criminal offence) to govern decommissioning of the Scheme.</p> <p>In relation to land stewardship and restoration of land after the lifespan of the Scheme, the oDS [REP1-058] confirms, at paragraph 2.1.2, that “<i>when the operation phase ends, the Solar PV Site would be decommissioned and the land returned to the landowner. All PV panels, Mounting Structures, Cabling (not including the Grid Connection Infrastructure), Conversion Units / 33kV Sub-distribution Switch Rooms, BESS, Customer Substation, and Ancillary Buildings would be removed from within the Solar PV Site and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land where the soil health, quality and structure may have improved, and the established habitats. Foundations and other below ground infrastructure will be dug and buried respectively to –1.2m below the surface to enable future ploughing. Any piles would be removed</i>”. Further, the Planning Statement [REP1-012] confirms (at paragraph 4.5.2) that, as part of the returning of the land for the Solar PV Site to the landowner, the Applicant will return the land “<i>to its original use and condition as far as practicable</i>”.</p> <p>After the decommissioning phase, the landowner(s) would choose how the land is to be used and managed. They may choose to return all of the land to agricultural use, although it is possible that established habitats such as hedgerows and woodland could be retained, given their potential benefits to agricultural land and the wider farming estate.</p>
CPRE14	<p>Page 4, Para. 7</p> <p>The Drovers Solar Farm proposal fails to meet key national policy requirements:</p> <ul style="list-style-type: none"> It risks permanent loss of productive agricultural land. It causes unacceptable landscape and visual impacts. It fails to consider lower-impact, sequentially preferable alternatives. It lacks compliance with the Environment Act and net gain obligations. 	<p>The Applicant's responses to CPRE5 and CPRE6 within Table 4.2 of the Applicant's Response to Relevant Representations [REP1-067] addressed matters of agricultural land and site selection. These responses are also addressed within the responses to CPRE1 and CPRE5 above.</p> <p>With regards to landscape and visual effects, the Applicant's response to CPRE3 within Table 4.2 of the Applicant's Response to Relevant Representations [REP1-067] outlines how ES Chapter 6: Landscape and Visual [AS-016] concluded that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. Paragraph 5.10.35 of NPS EN-1 confirms that “<i>The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.</i>”</p> <p>As outlined within paragraph 8.3.177 of the Planning Statement [REP1-012], given the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.</p> <p>An updated Biodiversity Net Gain Assessment Report [REP1-048] was provided at Deadline 1, which demonstrates that the Scheme will result in demonstrable net gains in habitat units and hedgerows units within the Site boundary which amount to calculated gains in excess of 400 habitat units and in excess of 185 hedgerows units. As set out in Requirement 9(2) of Schedule 2 of the draft DCO [APP/3.1.2], although BNG is not currently a statutory requirement for DCO's within the</p>



Reference Number	Comments	Applicant's Response
CPRE15	<p>Page 5</p> <p>This proposal fails to meet key requirements set out in the adopted Breckland Local Plan.</p> <ul style="list-style-type: none"> • Policy GEN 02 (...)The proposed industrial-scale development would significantly alter the rural landscape and is incompatible with the local character of the Breckland countryside. The visual intrusion would be especially acute from local rights of way and nearby properties. • Policy ENV 05 (...)The site of The Drovers Solar Farm forms part of an open, undeveloped rural setting that contributes to the area's landscape value. No sufficient landscape impact assessment has been presented to justify the scale and sensitivity of this development. • Policy ENV 06 (...)The proposal risks fragmentation of existing hedgerows and insufficient or unsuitable compensatory planting. The site layout does not indicate adequate biodiversity buffers or enhancements to mitigate the loss of semi-natural habitat, failing to meet the policy's aims. • Policy EC 06 (...)While this policy supports diversification, it makes clear that development must be "appropriate in scale and character" and not conflict with wider sustainability and environmental objectives. This scheme far exceeds the scope of reasonable diversification and appears driven by commercial energy generation objectives rather than agricultural enhancement. 	<p>Environment Act, the Applicant has secured a minimum of 10% biodiversity net gain in habitat units and a minimum of 10% for hedgerow units.</p> <p>The Applicant considers, through Table 5 of the Policy Compliance Document [REP1-014], that the Scheme has fully considered the relevant Breckland Local Plan Policies (GEN 02; ENV 05; ENV 06; and EC 06).</p> <p>The Applicant notes that ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p> <p>A robust and full Landscape and Visual Impact Assessment has been undertaken and is included in ES Chapter 6: Landscape and Visual [AS-016]. There are a number of different mitigation measures embedded within the Scheme which have been included to limit potentially adverse effects upon the landscape. These mitigation measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.2], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.2] and the oLEMP [REP1-060]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.1 "respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment", 2.5 "respect setting of heritage assets along the Nar Valley", 2.8 "consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane" and 2.9 "consider experience of people using the PRow".</p> <p>Mitigation measures have included:</p> <ul style="list-style-type: none"> • Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access • Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site • In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRow and droves within the Site itself • The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [REP1-060]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not



Reference Number	Comments	Applicant's Response
		<p>only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings</p> <ul style="list-style-type: none"> • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in the Design Principles, Parameters and Commitments [APP/5.8.2] and will be secured by Requirement 5 of the draft DCO [APP/3.1.2]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site; and • As referred to within the oLEMP [REP1-060], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. <p>As outlined within paragraph 8.3.177 of the Planning Statement [REP1-012], given the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.</p> <p>A detailed response to Policy ENV 06 is provided at Table 5 of the Policy Compliance Document [REP1-014]. With regard to Policy ENV 06 which focuses on the effects on trees and hedges, ES Chapter 7: Ecology and Biodiversity [REP1-034] sets out that the design of the Scheme has evolved to avoid impacts and effects on ecology and biodiversity as far as practicable. The Scheme incorporates a number of enhancements resulting in a number of significant beneficial effects, including (but not limited to) long-term beneficial effects at the local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting set out in the oLEMP [REP1-060].</p> <p>A detailed response to Policy EC 06 is also provided at Table 5 of the Policy Compliance Document [REP1-014]. The Scheme would not impact any existing farm buildings or the continued viability of the farm holding. ES Chapter 14: Socio-Economics [APP-063] confirms that the Site includes landholdings for agricultural business. The assessment concludes that the Scheme's construction, operational and decommissioning phases will have a minor adverse effect on land use, which is not significant in EIA terms. The surrounding land is predominantly agricultural.</p>
CPRE16	<p>Page 5 <i>[Bullet Point 7] (...)</i>The proposed site may comprise Grade 3 quality land, classifying it as Best and Most Versatile (BMV). Policy guidance at both national and local levels advocates against the irreversible loss of BMV land unless there is no alternative. The Breckland Local Plan (ENV 01) emphasises the need to maintain and protect soil quality.</p>	<p>The Applicant considers, through Table 5 of the Policy Compliance Document [REP1-014], that the Scheme has fully considered policy ENV 01 of the Breckland Local Plan.</p> <p>The land for the Scheme has been the subject of a detailed ALC survey, as reported in ES Chapter 11: Soils and Agriculture [AS-018]. The irreversible loss of BMV is limited to 8.8 ha, of which 3.7 ha is for woodland planting, as set out in paragraph 11.10.3. Soil quality will be maintained as set out in ES Chapter 11: Soils and Agriculture [AS-018] and the oSMP [REP1-062].</p>



Reference Number	Comments	Applicant's Response
CPRE17	<p>Page 5 <i>[Bullet Point 8]</i> (...)The proposal contributes to a growing concentration of solar schemes in the Breckland area. There is no cumulative impact assessment to measure the combined visual, landscape, and ecological burden of this and other nearby energy developments. The absence of a landscape capacity analysis undermines the credibility of the scheme.</p>	<p>The Applicant has responded to matters regarding the cumulative assessment methodology within Applicant's Response to Relevant Representations [REP1-067], which sets out that the assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and the Planning Inspectorate's Advice Note on Cumulative Effects Assessment, which assesses the cumulative impacts on Landscape and Visual Character and ecology.</p> <p>ES Chapter 6: Landscape and Visual [AS-016] includes extensive baseline analysis which takes account of the published landscape character areas on a national and local level, as well as the existing visibility towards the Site from a number of locations within the LVIA study area. The findings of the LVIA baseline assessment, existing Site constraints and a review of national and local policy have all guided the scale and layout of the Scheme and proposed development parameters included as part of the DCO Application. The cumulative assessment of landscape and visual impacts has been presented in ES Chapter 6: Landscape and Visual [AS-016]. This has concluded two significant adverse effects on E6: North Pickenham Plateau LCA and VRG4: Great Palgrave and Little Palgrave.</p>
CPRE18	<p>Page 5, Summary 2 The Droves Solar Farm proposal fails to meet key local policy requirements:</p> <ul style="list-style-type: none"> • It conflicts with several core policies in the Breckland Local Plan (GEN 02, ENV 05, ENV 06, ENV 01, and EC 06). • It fails to demonstrate need or appropriateness for the use of greenfield and potentially BMV land. • It fails to meet the expectations for low-impact renewable energy development. 	<p>Breckland Local Plan Policies GEN 02, ENV 05, ENV 06 and EC 06 are addressed within response CPRE14 above. The matters of site selection and BMV land are addressed within the above responses CPRE1 and CPRE2.</p> <p>It should be noted that paragraph 5.10.5 of NPS EN-1 (2023) recognises that “<i>virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>”. As noted within section 8.3 of the Planning Statement [REP1-012], fulfilling the requirement for good design whilst demonstrating full adherence to the mitigation hierarchy has been of paramount importance. The Scheme's design and evolution have placed ongoing consideration for landscape and visual matters.</p>
CPRE19	<p>Page 6, Paras. 1 – 3 CPRE Norfolk welcomes the expansion of renewable energy but stress the importance of scale, siting, and landscape sensitivity. We want to see new renewable energy projects done well, in a way that minimises impacts on the Norfolk countryside. This proposal fails on all three counts.</p> <p>This proposal would introduce industrial-scale infrastructure into a rural, visually sensitive setting, resulting in significant and irreversible landscape harm.</p> <p>The proposal is inconsistent with the objectives of national and local planning policy, which seek to protect distinctive landscapes, support sustainable rural communities, and direct inappropriate development away from the open countryside.</p>	<p>The Applicant's previous responses to CPRE1 within Table 4.2 of the Applicant's Response to Relevant Representations [REP1-067], as well as CPRE 1 above sets out the rigorous process that the Applicant undertook to select the Site including the consideration of environmental constraints, as well as how the Scheme has CNP as a large-scale solar generation project.</p> <p>ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme. Landscape value is a key consideration when defining a landscape receptors sensitivity. Landscape value and baseline characteristics of the Site and study area have influenced sensitivity conclusions through an assessment of landscape value included within Table 3 of ES Appendix 6.5: Evaluation of Landscape Value [APP-143]. This value assessment considered a number of factors such as Natural Heritage, Cultural Heritage, Landscape Condition, Associations, Distinctiveness, Recreational, Perceptual (scenic), Perceptual (wilderness and tranquillity) and Functional. The value rating for these factors varied between local value, community value and limited value – reflecting the presence and value of respective qualities within the Site and its context. The overall judgement for the value of a landscape receptor, such as an LCA of community value, takes account of the different value ratings ascribed to the factors referred to above. These judgements are balanced and representative of the qualities highlighted within the assessment.</p> <p>The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p>



Reference Number	Comments	Applicant's Response
		<p>It should be noted that paragraph 5.10.5 of NPS EN-1 (2023) recognises that “<i>virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>”. As noted within section 8.3 of the Planning Statement [REP1-012], fulfilling the requirement for good design whilst demonstrating full adherence to the mitigation hierarchy has been of paramount importance. The Scheme's design and evolution have placed ongoing consideration for landscape and visual matters.</p> <p>As noted within the Planning Statement [REP1-012], given the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.</p>



5. The Applicant's responses to Elected Representatives

Reference	Comments	Applicant's Response
George Freeman, Member of Parliament (MP) for Mid Norfolk – Written Representation [REP1-102]		
GF1	<p>Page 1, section 1, point 1</p> <p>The application should be refused or, at minimum, deferred pending submission of complete and robust environmental information on cumulative effects with High Grove and on all reasonable grid-connection options, including their full onshore cable and substation routes.</p>	<p>The Applicant has responded to matters regarding the cumulative assessment methodology within Applicant's Response to Relevant Representations [REP1-067], which sets out that the assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and the Planning Inspectorate's Advice Note on Cumulative Effects Assessment.</p> <p>The Planning Inspectorate's Advice Note on Cumulative Effects Assessment recognises that there will be a varying levels detail available depending on the stage of any cumulative development and that the cumulative assessment should be undertaken at a level of detail proportionate to the information available.</p> <p>The Applicant would also note that the High Grove Solar Farm will be required to undertake a comprehensive cumulative impact assessment as part of the Environmental Impact Assessment to support their DCO application. The Environmental Statement accompanying the High Grove DCO application will present the cumulative assessment based upon the detail set out in this DCO Application and the detail of the High Grove Solar Farm, along with any further mitigation measures if required.</p>
GF2	<p>Page 1, section 1, point 2</p> <p>A critical material unknown: the final grid connection location and route prevent a proper assessment of effects on the Mid Norfolk landscape, communities, and environment.</p>	<p>The Applicant refers to its Written Summary of Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071] in which, at Agenda Item 3.2, it sets out its position in this regard. Specifically, the Applicant wishes to reiterate that it has an existing connection agreement with National Energy System Operator (NESO) but has been informed that this agreement has been re-prioritised as a Gate 1 agreement. This means that the agreement will be subject to an Agreement to Vary to new Gate 1 terms.</p> <p>However, no Agreement to Vary (offer) has yet been received by the Applicant (therefore, in this sense, the Applicant does not yet hold a Gate 1 connection offer). Therefore, Applicant's position is that until National Grid Energy Transmission (NGET) or NESO confirm otherwise, the contractual obligations comprising the Applicant's grid connection offer for the Scheme remain binding.</p> <p>The Applicant considers that the Scheme is sufficiently defined such that the impacts of the proposals can and should be assessed as they are presented. Should the location of the connection point change, the Applicant refers to its Response to Section 89(3) Letter dated 17 March 2026 [AS-063] – the Applicant's expectation is that NGET will determine that the proposed location for the National Grid Substation is suitable (given the Applicant's site selection methodology being akin to NGET's site selection process). However, the Applicant retains the ability to separately seek consent for the grid connection from the Customer Substation to the National Grid Substation in the unlikely event that NGET subsequently decides that they would prefer to site the National Grid Substation elsewhere. If that situation arises after consent for the DCO is granted, then any future consent application (whether as a change to the DCO or a separate planning application under the Town and Country Planning Act 1990) for the connection from the Customer Substation to that National Grid Substation would cumulatively assess that application with the works consented under the DCO. This will ensure there is no 'gap' in the assessment of environmental effects, and could include the production of a new Environmental Statement for the separate connection application. The Applicant reiterates that it is not a barrier to granting consent for a generating station if the point of connection is not yet identified or consented.</p> <p>The Applicant has also addressed this point in further detail in response to NGET8 of this document.</p>



Reference	Comments	Applicant's Response
GF3	<p>Page 1, section 1, point 3</p> <p>While renewable generation is supported in principle, policy requires that significant adverse impacts are addressed satisfactorily. Here, cumulative landscape, environmental, agricultural, and socioeconomic harms, amplified by grid-connection uncertainty, remain unresolved and potentially significant.</p>	<p>These points are addressed within the responses below.</p>
GF4	<p>Page 1, point 2</p> <p><u>Cumulative impacts with High Grove and other committed or reasonably foreseeable schemes</u></p> <ul style="list-style-type: none"> • Geographic scope: Approximately 25 villages in Central/Mid Norfolk lie within the zone of influence of the proposed High Grove and Droves schemes. The combined footprint and infrastructure corridors would create a de facto “solar park belt”. • Biodiversity, habitats, and environment: <ul style="list-style-type: none"> ○ Loss, fragmentation, and functional severance of habitats across multiple sites and cable corridors impacting upon food security and supply chains. ○ Construction-phase disturbance (noise, lighting, dust) across overlapping work windows. • Landscape, visual amenity, and tourism: <ul style="list-style-type: none"> ○ The cumulative change from rural, open arable landscapes to industrial-scale infrastructure threatens the setting and visitor appeal of Castle Acre, the Peddars Way, Swaffham, and their surrounding countryside. ○ Cable corridors, haul roads, HDD compounds, and permanent substations would alter Central Norfolk’s rural character well beyond anything seen before, with an almost immediate move from an agricultural region to an industrialised one. • Construction traffic: <ul style="list-style-type: none"> ○ Overlapping HGV peaks, abnormal loads, and road safety risks on constrained lanes and village streets. ○ Network resilience concerns, dust and noise for sensitive receptors, and disruption to local businesses and visitor economy during prolonged multi-year works. • Precedent and inducement effects: <ul style="list-style-type: none"> ○ Land-agent reports indicate c.20,000 acres “in the pipeline.” Approving Droves alongside High Grove accelerates a self-reinforcing cluster, intensifying cumulative harms beyond those appraised. 	<p>The Applicant has responded to matters regarding the cumulative assessment methodology within Applicant's Response to Relevant Representations [REP1-067], which sets out that the assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and the Planning Inspectorate’s Advice Note on Cumulative Effects Assessment, which (by example) addresses landscape, biodiversity visual amenity, tourism and traffic.</p> <p>The Planning Inspectorate’s advice note on Cumulative Effects Assessment recognises that there will be a varying levels detail available depending on the stage of any cumulative development and that the cumulative assessment should be undertaken at a level of detail proportionate to the information available.</p> <p>The Applicant would also note that the High Grove Solar Farm (and any other future solar application) will be required to undertake a comprehensive cumulative impact assessment as part of the Environmental Impact Assessment to support their DCO Application. The Environmental Statement accompanying the High Grove DCO application will present the cumulative assessment based upon the detail set out in this DCO Application and the detail of the High Grove Solar Farm, along with any further mitigation measures if required.</p>
GF5	<p>Page 2, point 3</p> <p><u>Grid connection: material unknowns and inadequate assessment</u></p> <ul style="list-style-type: none"> • Undecided grid connection location and route: <ul style="list-style-type: none"> ○ The application does not fix the point of connection, cable route, or substation siting. Each plausible option carries distinct impacts on 	<p>The Applicant refers to its response to GF2 above in relation to the grid connection location.</p> <p>The Applicant has set out a clear set of parameters, both spatial and written, within the Works Plan [APP-009] and the Design Principles, Parameters and Commitments [APP/5.8.2] for the National Grid Substation and Grid Connection Infrastructure. On this basis, the Applicant has undertaken a reasonable worst-case assessment based upon these parameters (the Rochdale Envelope approach) for the Scheme. The Rochdale Envelope approach is a recognised approach</p>



Reference	Comments	Applicant's Response
	<p>hedgerows, watercourses, woodland, setting of heritage assets, rights of way, and settlement edges.</p> <ul style="list-style-type: none"> ○ The absence of route certainty prevents cumulative analysis of effects with High Grove application and any other future schemes. ○ Without defined parameters, the Environmental Statement cannot lawfully assess worst-case effects or propose targeted mitigation. This is a fundamental EIA deficiency. 	<p>to undertaking environmental impact assessment for schemes of this nature as set out in The Planning Inspectorate's Advice Note Nine; Rochdale Envelope.</p> <p>At this stage of the Scheme, the Applicant considers that it is necessary to incorporate flexibility into the DCO Application for development consent. The Applicant has described the flexibility for Scheme, within the written and spatial parameters which are set out within the Design Principles, Parameters and Commitments [APP/5.8.2] and the Works Plan [APP-009] both of which are secured through draft DCO [APP/3.1.2]. The Applicant has submitted a series of outline management plans, which are secured by the draft DCO [APP/3.1.2], which includes further written prescription which will be used to guide the detailed design of the Scheme. The Applicant is of the opinion that the parameters-based approach provides sufficient information to enable the likely significant effects on the environment to be assessed and that these have been presented within the Environmental Statement.</p> <p>The Applicant has also addressed this point in further detail in response to NGET8 of this document.</p>
GF6	<p>Page 2, point 4 <u>Agricultural land use, soils, and the rural economy</u></p> <ul style="list-style-type: none"> • Immediate effects: <ul style="list-style-type: none"> ○ Large-scale withdrawal of productive agricultural land reduces local output and threatens agri-supply chains and seasonal employment, contrary to the county's role as a leading hub of agricultural innovation. ○ Both Natural England and Applicant estimate over 50% of site is BMV land, Natural England indicating 54%, and the applicant stating 51.7%. Either percentage is hugely significant. • Long-term soil health: <ul style="list-style-type: none"> ○ Multi-decade panel cover (lasting 30–40 years in the application) risks soil structure degradation and reduced organic matter if not actively managed. Reinstatement after decades is uncertain; the Environmental Statement lacks binding soil recovery plans and monitoring. 	<p>The assessment of potential effects as a result of a change from a mixture of arable, livestock and agri-environmental management to a grazing and agri-environmental management, is set out in ES Chapter 11: Soils and Agriculture [AS-018]. This considers the Scheme in the context of agricultural land in Norfolk and Breckland. It is noted that in 2015 some 444,000 ha of arable land nationally was not in productive agricultural use but in agri-environmental schemes, and any effects must be seen in context.</p> <p>Agricultural use including sheep grazing, which currently occurs on the Site, could continue with the need for agricultural labour and supply chains. Land management of the land around and under the panels will require labour and land management machinery use.</p> <p>Based on the published provisional and Likelihood of Best and Most Versatile Land maps available at the time of the understanding the Environmental Statement (Plates 11-1 and 11-2), the Site reflected some of the poorest agricultural land in Norfolk.</p> <p>The Site will be managed during the operational phase, as set out in the ES Chapter 11: Soils and Agriculture [AS-018], and there will be long-term benefits for soils, as set out in paragraphs 11.8.78 to 11.8.86.</p>
<p>James Wild MP for North West Norfolk – Written Representations [REP1-104]</p>		
JW1	<p>Page 1, paragraph 2 Grid Connection Uncertainty.</p> <p>Paragraph 3.3.79 of NPS EN-1 requires applicants to demonstrate how the full chain of consents, including grid connection, will be secured. Proceeding on this basis, with any Gate 2 offer deferred, fails that requirement, creating a deliverability deficit, particularly as NGET's evidence was that its position "won't change during the course of the examination or prior to the Secretary of State determination", risking consent absent to a demonstrable route for exporting electricity.</p>	<p>The Applicant refers to its Response to Section 89(3) Letter dated 17 March 2026 [AS-063] and the Written Summary of the Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071] (specifically Agenda Item 3.2) for a full response on this matter.</p> <p>The Applicant disagrees that the Scheme conflicts with paragraph 3.3.77 of NPS EN-1 2023, which corresponds with paragraph 3.3.79 of NPS EN-1 2025, which specifically concerns how connected infrastructure (in the case of this paragraph, offshore wind or an Offshore Hybrid Asset (OHA)) will be consented and how cumulative impacts will be assessed, and whether any necessary consents, permits and licences have been obtained.</p> <p>Notwithstanding that the Scheme is not an offshore wind or an Offshore Hybrid Asset (OHA), the Scheme is considered to be compliant with paragraph 3.3.77 of EN-1.</p> <p>In summary, and to reiterate, the DCO Application is seeking consent for, but not placing 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</p>



Reference	Comments	Applicant's Response
		<p>development consent for it as an option. If NGET decides to locate the National Grid Substation in another location, then consent can be obtained for the connection works separately. The Applicant is not aware of any reasons as to why this substation should be refused as associated development to the Scheme.</p> <p>Further, the Applicant notes that any powers of compulsory acquisition can only be exercised for the purpose for which they are originally sought. Therefore, if NGET decides to locate the National Grid 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 that land.</p> <p>It is an established principle that an applicant is not required to deliver a connection to a generating station as part of a DCO application for that generating station, provided that a connection agreement is in place. In other words, it is not a barrier to granting consent for a generating station if the point of connection is not yet identified or consented.</p> <p>The Applicant has a grid connection offer for the Scheme requiring it to secure consent and land for the point of connection. 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. Consent for the potential National Grid Substation in this location should therefore be fully examined, and NGET will then have the option to carry out the works should NGET determine that the proposed site for the National Grid Substation is suitable (which the Applicant expects to happen, given that the Applicant's site selection methodology is akin to NGET's site selection process). However, 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 (with updated environmental information and assessment) for the connection to the National Grid Substation as a result.</p> <p>The Applicant has also addressed this point in further detail in response to NGET8 of this document.</p> <p>The Consents and Agreements Position Statement [APP-185] provides information on the additional consents and licences that are or may be required to construct and operate the Scheme. It is noted that paragraph 3.3.77 of EN-1 does not require the Applicant to have these other consents, permits and licences secured in advance of a DCO being granted. The Applicant therefore respectfully disagrees that there is a failure to meet the requirements of paragraph 3.3.77 of NPS EN-1.</p>
JW2	<p>Page 1, paragraph 3 Absence of Confirmed Substation Proposals.</p> <p>NGET stated it is “not currently developing proposals to build a new substation within the project order limits” and remains “agnostic” as to the final site. It further confirmed a Gate 1 offer “does not constitute a commitment... to deliver a substation of this size and design in this location”. Paragraph 3.3.79 of NPS EN-1 requires necessary connected infrastructure be demonstrably deliverable. That is not satisfied as the NGET has neither adopted the proposed site nor committed to deliver the infrastructure in that form. Consent would therefore rely on infrastructure not presently committed, or defer a core element to a later stage.</p>	<p>The Applicant refers to its response to JW1 above on this matter which has, in the Applicant's view, been sufficiently addressed. The Applicant has also addressed this point in further detail in response to NGET8 of this document.</p>
JW3	<p>Page 1, paragraph 4 Construction Traffic and the A1065.</p>	<p>A review of road safety and collision data has been undertaken within ES Appendix 9.2: Traffic Assessment [APP-163] which concludes there are no existing highway safety issues along the A1065, as well as a Stage 1 Road Safety Audit being undertaken of the highway proposals within</p>



Reference	Comments	Applicant's Response
	<p>Local testimonies describe the A1065 as “one of the most dangerous roads in the county” and already under strain. These pressures are intensified by cumulative impact with the neighbouring High Grove scheme, together covering approximately 7,000 acres. NPPF paragraph 116 requires cumulative highway impacts to be assessed against a severe impacts test. However, the Applicant's oCTMP defers key routing and safety measures to a post-consent stage, meaning there is no assessed basis for concluding that a peak of 622 daily vehicle movements can be safely accommodated. There also continues to be no meaningful consultation on these deferred measures, and local concerns remain that the proposed fencing could funnel deer across the A1065 through narrow corridors, creating an added collision risk.</p>	<p>Annex C of ES Appendix 9.2: Traffic Assessment [APP-163] which confirms the access and highway proposals are acceptable in highway safety terms.</p> <p>The assessment of the construction traffic and cumulative related effects on the local road network, including the A1065, have been considered within ES Chapter 9: Transport and Access [REP1-036] which concludes there are no likely significant (in EIA terms) effects anticipated.</p> <p>With regards to the impact of deer, 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.</p>
JW4	<p>Page 1, paragraph 5 Landscape Bunds and Visual Impact</p> <p>To address potential radar interference at RAF Marham and the DIO's objection, it was stated at ISH1 that earth bunds may be required along the eastern boundary. Evidence indicated these could be 4.5 metres high, 20 metres wide at the base, and of substantial length. The Applicant declined to address scale in detail, describing this as “premature”. This neglects paragraph 2.6.2 of NPS EN-3 and Planning Inspectorate Advice Note 9, which requires assessment on a “worst-case” basis. For reference, a comparable scheme at West Camel near RNAS Yeovilton required smaller bunds yet was described as a “blot on the landscape” by South Somerset District Council Area East Committee. The likely scale of bunding here has not been assessed within the visual impact work, leaving a gap in the assessment.</p>	<p>Details relating to mitigation measures for RAF Marham are currently not fully known, as these are being discussed with the MoD. Once confirmed, these will be appropriately assessed.</p>
JW5	<p>Page 2, paragraph 6 Construction and Operational Noise Pollution.</p> <p>The scheme would introduce sustained noise into a tranquil rural landscape prized by residents and walkers on the Peddars Way and Nar Valley Way. Construction would involve a two-year programme of 11-hour working days, including piling, HGV movements from 07:00, and potential night and weekend operations. The 10.5-hectare Battery Energy Storage System would introduce continuous operational noise over a minimum 60-year period. NPPF paragraphs 187(e) and 198(a)–(b) require development to avoid unacceptable noise impacts and protect tranquil areas. The Applicant's oCEMP does not assess cumulative noise effects from neighbouring schemes and defers mitigation to a post-consent. There is therefore no demonstrated basis for concluding these effects can be avoided.</p>	<p>The noise impacts of the Scheme are presented in ES Chapter 10: Noise and Vibration [APP-059], which includes assessment of noise effects from the construction and operational phases of the Scheme. The effects are based on worst-case scenarios, based on closest point of construction activity to receptors and PRoW, which are determined as not significant in EIA terms. For most of the construction programme duration, the noise levels and effects will be lower than those presented in ES Chapter 10: Noise and Vibration [APP-059] which are worst-case. ES Chapter 10: Noise and Vibration [APP-059] also details embedded and additional mitigation measures that will restrict construction working hours, in particular, additional mitigation further restricts piling activity to no more than two periods of four hours each with at least one hour of no piling in between for receptors within 400m of the piling activity. It also outlines procedures for notification of any night-time work if necessary, and general best practice to manage noise to acceptable levels to within non-significant effects.</p> <p>Operational noise from the BESS has been assessed with due cognisance to the existing acoustic environment and character of the area. Appropriate criteria and absolute levels with conservative assumptions on operation and noise character penalties have been applied to present worst-case non-significant effects that are unlikely to be observed in practice. Indicative cumulative assessment has been presented in ES Chapter 10: Noise and Vibration [APP-059], and a commitment has been made in the oCEMP [APP/7.6.2] to collaborate with the nearby development (High Grove Solar Farm), to seek to achieve acceptable cumulative noise levels and non-significant effects at all affected receptors. While the Scheme may be audible at some closest receptors to the boundary and PRoW, it is unlikely to generate noise levels at receptors or PRoW that will cause disturbance or annoyance and has been determined to have non-significant noise and vibration effects.</p>



Reference	Comments	Applicant’s Response
JW6	<p>Page 2, paragraph 7 Heritage Loss.</p> <p>The impact of the proposal on the setting and significance of a nationally important cluster of designated heritage assets in the Nar Valley remains unresolved. The area is described by heritage experts as Norfolk’s “Holy Land” due to its concentration of medieval religious sites, Norman earthworks and Grade I listed churches. Expert testimony at ISH1 made clear the surrounding landscape is intrinsic to significance, with monuments deliberately sited to command the topography and their setting central to their experiences, particularly along the “Norman ridge approach” where the Priory, Church and Castle are experienced in sequence. NPPF Paragraph 212 requires great weight be given to designated heritage assets. However, the Applicant’s assessment continues to treat the landscape as secondary rather than integral, leaving a gap in heritage assessment and resulting in potential harm to their setting and significance.</p>	<p>The impacts of the Scheme are presented within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The landscape setting of the heritage assets is fully recognised; however, not all aspects of setting make an equal contribution to significance. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets due to the lack of shared experience between the plateau land and the heritage assets, which is a prerequisite for contribution to significance. The Scheme would retain the village siting, the visual and spatial connection between the assets, the connection to the Peddars Way and the vast majority of the surrounding landscape visible from the heritage assets and in views towards the heritage assets. The majority of views will be unchanged, with only very small elements of the wider Scheme (at least partially screened under the proposals) remaining.</p>
JW7	<p>Page 2, paragraph 8 Engagement and Community Benefit.</p> <p>Despite the Examining Authority’s instruction (Action Point 13) for engagement with local councils by Deadline 1, Castle Acre Parish Council reports “meaningful discussions” have not taken place, and correspondence dated 7 July 2025 remains unanswered. A further request on 27 May 2026 to establish a process for community benefit has also received “no response”, inconsistent with the Applicant’s position engagement is ongoing.</p> <p>Continued reliance on a generic community fund, as previously noted, does not secure direct benefits such as discounted energy bills, and an agreed mechanism for community benefit at the very least is yet to be established.</p>	<p>The Applicant continues to be open to ongoing engagement with the Parish Council and is currently exploring options for a further briefing on the matter of Community Benefits, including in response to the correspondence identified in JW7. That said, the Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). The Applicant, therefore, is not required to provide information as part of the DCO process on the levels of funding for communities affected by the Scheme, nor the administration of the Community Benefit Fund itself.</p> <p>The Applicant is committed to delivering a Community Benefit Fund in relation to the Scheme, should development consent be granted. The Applicant considers this to be an appropriate and proportionate way of providing a direct benefit to the local community – community benefits have been consulted on throughout the pre-application process, and ongoing discussions will inform how funding is best distributed within the community. A local foundation will likely independently determine the local initiatives to provide services to the community that are chosen to benefit from the Community Benefit Fund. There are, however, no current plans to provide subsidised energy or rebates to the local community directly as a result of the Scheme.</p>
JW8	<p>Page 2, paragraph 9 Conclusion</p> <p>The National Policy Statements and the National Planning Policy Framework require proposals to be properly assessed, deliverable, and to take account of local circumstances and cumulative impacts. However, the unresolved concerns set out show that this proposal in its current form falls short of those requirements. I therefore urge the Examining Authority to weigh these concerns carefully and reflect them in its recommendation to the Secretary of State.</p>	<p>The Applicant previously provided a response with regards to how the Applicant has adequately assessed cumulative impacts at GF4 within Table 6.2 of the Applicant’s Response to Relevant Representations [REP1-067]. In addition, the Applicant also addressed how it has considered local circumstances, including cumulative effects, at GF12 of the Applicant’s Response to Relevant Representations [REP1-067].</p> <p>As previously outlined, the Scheme has been designed with careful regard to local circumstances, informed by ongoing consultation, technical engagement, and environmental assessment. Early and continued engagement with the local community, including public consultations, having helped shape the Scheme, as set out in the Consultation Report [APP-025].</p> <p>The Policy Compliance Document [REP1-014] demonstrates the Scheme’s compliance with the relevant NPSs and the NPPF.</p> <p>Having regard to all important and relevant matters, the Applicant concludes in the Planning Statement [REP1-012] that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1 (2023).</p>



Reference	Comments	Applicant's Response
Tim Hubbard, Chair of Castle Acre Parish Council – Written summaries of oral representations at OFH1 and ISH1 [REP1-084]		
TH1	<p>Page 1, Paragraph 1</p> <p>In this brief, I am confirming the continued objection from both communities to the proposed Droves Solar Farm complex and sub-station as laid out in our representation made to the Planning Inspectorate 24th February 2026.</p>	<p>This is noted by the Applicant.</p>
TH2	<p>Page 1, Paragraph 1</p> <p>We are not opposed to renewable energy, we are however strongly opposed to, and deeply concerned about the inappropriate location for The Droves Solar complex and the overwhelming negative impact it (along with the potential High Grove Site, if approved) will have on the local area and communities for the next sixty years!</p> <p>As we understand Solar generation is only 10-15% efficient and has to be highly subsidised by the taxpayer for it to even be considered as a commercial energy source.</p>	<p>The Applicant is aware of other projects in the region. Each of the ES Topic Chapters and ES Chapter 18: Summary of Effects [APP-067] consider their cumulative effects. In addition, the Statement of Need [APP-042] and Planning Statement [REP1-012] submitted in support of the DCO Application, set out the justification for the Scheme and its proposed location and scale within the context of the clear and urgent national need for low-carbon energy generation.</p> <p>Furthermore, the Applicant submitted the Report on Interrelationships between Projects [REP1-066] at Deadline 1 which focuses on the inter-relationships with High Grove Solar Farm because it was considered that the inter-relationships with other NSIPs within Norfolk would be limited.</p> <p>Section 3.2 of the Statement of Need [APP-042] explains that government's analysis indicates that a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar. Government policy on solar energy is included at Section 3.3 of the Statement of Need [APP-042]. Paragraph 3.3.5 explains that since "solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation" solar is also expected to bring forwards affordability benefits for consumers. Further, "solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free" (NPS EN-3, paragraphs 2.10.13 and 2.10.14). Further information on the productivity (load factor) and efficiency of solar generation can be found in Section 6.8 of the Statement of Need [APP-042]. Figure 9-2 of the Statement of Need [APP-042] shows that renewable generation technologies, including solar generation, are much less expensive on a levelised cost basis than technologies which are reliant on fossil fuels, even when fuel input costs are included at a low level.</p>
TH3	<p>The Droves Solar Complex will Harm the Setting of an Exceptional Heritage Cluster.</p> <p>Sited alongside the A1065, a major Gateway Route for most visitors to North Norfolk, the development will introduce large scale industrial infrastructure into the open, rural landscape that forms the historic and experiential gateway to our unique villages and the local area, all of which is fundamental to their identity. It will directly impact the setting of Scheduled Monuments and Grade 1 Listed Buildings at for example the BCKLWN, suggested site inspections document 22nd April 2026, location '7' A1065, while undermining the attractiveness and amenity value of the local area to communities and tourists alike. This surely conflicts with Local Plan policies that seek to safeguard the intrinsic character and beauty of the countryside.</p>	<p>The impacts of the Scheme are presented within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The landscape setting of the heritage assets is fully recognised; however, not all aspects of setting make an equal contribution to significance. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets due to the lack of shared experience between the plateau land and the heritage assets, which is a prerequisite for contribution to significance. The proposals which would retain the village siting, the visual and spatial connection between the assets, the connection to the Peddars Way and the vast majority of the surrounding landscape visible from the heritage assets and in views towards the heritage assets. The majority of views will be unchanged, with only very small elements of the wider Scheme (at least partially screened under the proposals) remaining.</p> <p>An additional viewpoint from location '7' is being produced, however, it is understood that there is no visibility of Castle Acre from this location.</p>
TH4	<p>Page 2, Paragraph 3</p> <p>Impact on Statutory Heritage Assets and Their Setting</p> <p>The proposed solar farm lies within the setting of multiple designated heritage assets all listed in our representation, five being Scheduled Monuments. While the applicant may characterise the development as temporary, the visual and experiential harm caused by the scale, fencing, permanence of substations,</p>	<p>The Applicant refers to its response to TH3 above in relation to heritage matters. The only aspects that have been assessed as temporary within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] relate to construction activities.</p> <p>With regard to judgement of effects, the Applicant does not agree that the judgments underestimate the magnitude of harm. The assessment has utilised best practice methodology and followed the</p>



Reference	Comments	Applicant's Response
	<p>additional pylons, BESS and all associated grid infrastructure of the proposal along with ground disturbance and the long operational lifespan mean the impacts on landscape character, archaeology, soils, and heritage setting will be significant, enduring and in many respects, irreversible, compromising the cultural landscape around one of Norfolk's most important heritage clusters.</p> <p>The Landscape and Visual Assessments, underestimate the magnitude of harm by treating the landscape as visually containable through screening and planting which in themselves will change the character of the historic landscape. The application fails to fully assess the cumulative and sequential impacts of all multiple existing, consented and proposed developments, resulting in progressive industrialisation of the historic Nar Valley and surrounding visually sensitive landscape.</p>	<p>Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) 2013. GLVIA3 and all of its constituent paragraphs, where relevant, form a key guidance tool which underpins the methodology and assessment approach detailed within ES Chapter 6: Landscape and Visual [AS-016]. Potential adverse effects during construction, operation and decommissioning upon visual amenity and landscape character are detailed in full within Section 6.8 and Table 6-11 of ES Chapter 6: Landscape and Visual [AS-016]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p> <p>ES Chapter 6: Landscape and Visual [AS-016] also outlines the approach and details that cumulative effects may arise as a result of effects associated with the Scheme combining with effects associated with other developments. The Scheme has been assessed strategically in the context of existing (as part of the baseline context) and proposed solar and energy infrastructure schemes, including NSIP scale projects Norfolk wide. Only one development, High Grove Solar, has the potential to result in significant cumulative effects on Landscape and Visual within the associated LVIA Study Area.</p> <p>Section 6.11 undertook a Cumulative Effects Assessment which included High Grove Solar Farm which concluded that there would be:</p> <ul style="list-style-type: none"> - significant adverse visual effects during construction for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave; and - significant adverse landscape effects during construction and operation on the E6 North Pickenham Plateau LCA.
TH5	<p>Page 2, Paragraph 4</p> <p>Impact on the Breckland SPA, River Nar SSSI, Biodiversity and Local Nature Recovery Goals</p> <p>The site lies within the catchment of the River Nar, a chalk stream designated as a Site of Special Scientific Interest (SSSI). Chalk streams are globally rare, with approximately 280 worldwide. The River Nar and Valley have a range of important Biodiversity Action Plan habitats, including chalk stream areas, fens, wet meadows and woodlands, described by the Norfolk Rivers Trust as 'arguably Norfolk's most unspoilt and beautiful example'. The bird surveys submitted appear to be 'insufficiently' comprehensive to provide us with confidence that all protected and redlisted species namely 'Stone Curlew' which have previously been recorded on the proposed site and in the surrounding area have been properly identified and accounted for.</p>	<p>Embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse, are secured through the oCEMP [APP/7.6.2], and full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in Section 7.7 and 7.8 of ES Chapter 7: Ecology and Biodiversity [REP1-034], which concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant (in EIA terms) effects. Confirmation has been received from Natural England that they are in agreement with this conclusion.</p> <p>The Applicant notes that confirmation has been received from Natural England that the information provided is sufficient to conclude that the Scheme would not result in any likely significant adverse effects on the interest features of Breckland SPA (including Stone-curlew). Nonetheless, it is noted (in line with comments from Natural England) that Stone-curlew is a protected species in its own right under Section 1 of the Wildlife and Countryside Act 1981 (in line with all wild bird species), such that any intentional or reckless killing, injury, taking, damage or destruction of nests, obstruction or prevention of access to nests or damage or destruction of eggs would represent an offence. In addition, Stone-curlew is listed on Schedule 1 of that Act (in line with a number of bird species), such that it is also protected from disturbance whilst building a nest, in or near a nest containing eggs or young, or disturbance of dependent young. In line with other bird species, mitigation measures (including timing of works) are set out in the oCEMP [APP/7.6.2], which would prevent any potential offence in regard to Stone-curlew or any other bird species. Further, whilst Stone-curlew is not red listed (this species being Amber listed), the presence of a number of red listed bird species has indeed been identified and confirmed during the bird survey work undertaken. Taken as a whole, incorporating the mitigation proposed, the impacts of the Scheme on bird species</p>



Reference	Comments	Applicant's Response
		(in particular including red listed species such as Skylark and Eurasian Curlew, and with reference to the proposed mitigation and compensation measures) have been specifically considered within section 7.8 of the ES Chapter 7: Ecology and Biodiversity [REP1-034] which concludes that no significant effects are anticipated.
TH6	<p>Page 2, Paragraph 5 Loss of Best and Most Versatile Agricultural Land (BMV)</p> <p>There is a critical need for Agricultural Land to be maintained for domestic food production supporting future UK food security. The use of BMV land is under increasing pressure from development, Housing and Renewable Energy production (Infrastructure and Energy Crops). Surely, now is not the time to facilitate the destruction of a valued, irreplaceable asset, land, when there are obvious alternative locations for energy generation, brownfield sites and rooftop, among others. This proposal, well over 2,000 acres (along with others soon to come forward) will represent resource destruction on an industrial scale spanning over generations, East Anglia is the Breadbasket of England. The application fails to appreciate the ability of lower 'grade' soils to be highly productive and versatile when, for example irrigation is introduced (which is already available on some parts of the proposed site) for growing specialised root crops such as Carrots, Parsnips and Potatoes. Removing this land from agricultural use for six decades undermines sustainability objectives which support continued agricultural use and rural character.</p>	<p>The effects on agricultural land and food security were previously addressed within the response TH2 within Table 6.1 of Applicant's Response to Relevant Representations [REP1-067].</p> <p>Overall, ES Chapter 11: Soils and Agriculture [AS-018] concludes that the implications of the change from current farming practices (arable, agri-environmental and livestock) will have minor or negligible effects on the local and national land-based economy and food production.</p>
TH7	<p>Page 3, Paragraph 6 Public Rights of Way & National Trail Impact</p> <p>The Peddars Way (a National Trail) and the Nar Valley Way would be significantly affected by the proposed development impacting the amenity experience of users. The Peddars Way is a nationally designated route of historic, recreational, and tourism importance, following the route of a Roman road and later medieval pilgrimage trail.</p>	<p>The Applicant acknowledges concerns regarding the potential effects of the Scheme on local tourism, and PRoWs (which include Pedders Way and the Nar Valley Way). The assessment of effects on local tourism assets in ES Chapter 14: Socio-Economics [APP-063] concludes that, while some localised adverse effects on visual amenity and recreational experience may occur, particularly along certain PRoWs, these effects are limited in extent and not significant in EIA terms, and would reduce over time through mitigation (including landscape screening and enhancements secured through the oLEMP [REP1-060]). The assessment concludes that the Scheme would not materially affect overall visitor numbers or the functioning of tourism assets. Any adverse effects would be partially offset by improvements to the PRoW network, including enhanced connectivity and approximately 3.5 km of new permissive routes within the order limits. As such, no likely significant (in EIA terms) residual socio-economic effects are anticipated on local tourism assets.</p>
TH8	<p>Page 3, Paragraph 7 Impact on our Dark Skies</p> <p>The impact of operational and security lighting from the proposed solar farm, regardless of mitigation, on our near dark skies is an additional concern, adversely affecting their quality and their value to nocturnal wildlife.</p>	<p>The Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion sensing lighting and be used only for security and maintenance purposes as explained in oOEMP [APP/7.8.2] and ES Chapter 5: The Scheme [REP1-032]. Lighting is not required within the Solar PV Site during the operation phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. Temporary Site lighting would be used during construction to enable safe working during construction in hours of darkness or where natural lighting is unable to reach (such as sheltered/confined areas). Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the construction compounds while construction is underway. Commitments to ensure that a sensitive lighting strategy is developed as part of the detailed design have been made within the oCEMP [APP/7.6.2] and oOEMP [APP/7.8.2] as updated at Deadline 2.</p>
TH9	<p>Page 3, Paragraph 8 Noise Pollution</p>	<p>ES Chapter 10: Noise and Vibration [APP-059] presents a comprehensive assessment of noise effects across the construction, operation and decommissioning phases of the Scheme. Although there are many inverters and noise emitting plant, due to the large scale of the Scheme the</p>



Reference	Comments	Applicant's Response
	<p>Though we recognise that the solar panels themselves do not emit noise, the infrastructure surrounding the solar farm (once built) will generate operational noise, particularly the sub-station and battery storage, inverters and fans. During the construction period, noise generated by piling for the panel supports, the installation of associated infrastructure and construction traffic on local roads in this rural and tranquil landscape will all be intrusive, constantly affecting the quality of life for residents and all those using the Public Rights of Way and Footpaths on or near the solar installations as well as being damaging to local wildlife. The application does not adequately assess the cumulative impacts of construction traffic on highway safety, residential amenity, tourist activity, and the tranquil character of the area, particularly during peak visitor seasons.</p>	<p>equipment has been strategically positioned to increase separation distance to noise-sensitive receptors as far as reasonably practicable. The assessment also considers the tranquil context of the area and has been assessed to existing background and low absolute levels. The assessment shows residual noise effects to be not significant at noise-sensitive receptors such as residents and PRoW.</p> <p>The construction assessment has been undertaken on a conservative basis, showing construction activity, such as piling, taking place at the closest point to receptors. As such, the effects presented represent a worst-case scenario and for most of the duration of the construction phase the observed effects will be lower than those presented in the assessment, as the construction activity moves further away from receptors. These worst-case noise and vibration effects, including construction traffic noise at the highest predicted traffic month of the programme, were determined to be not significant (in EIA terms) when assessed to the relevant standards and appropriate criteria.</p> <p>The noise assessment also presents cumulative effects from the High Grove Solar Farm in combination with the Scheme, construction cumulative effects based on worst-case assumptions, such as potential overlap for short duration, were considered to be not significant (in EIA terms) and ES Chapter 9: Transport and Access [REP1-036] also states that, based on information within the submitted PEIR of High Grove Solar Farm, it is unlikely that there will be any construction traffic interactions between the two schemes as the construction programmes do not overlap.</p>
TH10	<p>Page 4, Paragraph 9</p> <p>Cumulative Impact, more than 3,800 hectares of solar developments proposed across Norfolk, (including the neighbouring High Grove proposal)</p> <p>The cumulative impact on landscape character, biodiversity, and heritage must surely be assessed at a strategic level, considering the legal requirements to:</p> <ul style="list-style-type: none"> • Protect designated and non-designated heritage assets and their setting. • Conserve ecological networks and sensitive habitats. • Avoid inappropriate development in open countryside and rural landscapes. <p>The application relies on generic national need for renewable energy but fails to demonstrate why this particularly sensitive site, within an exceptional heritage and ecological landscape, with its natural beauty is necessary to meet that need.</p>	<p>The Applicant has responded to matters regarding the cumulative assessment methodology within Applicant's Response to Relevant Representations [REP1-067], which sets out that the assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and the Planning Inspectorate's Advice Note on Cumulative Effects Assessment, which addresses landscape and biodiversity.</p> <p>The Planning Inspectorate's Advice Note on Cumulative Effects Assessment recognises that there will be a varying levels detail available depending on the stage of any cumulative development and that the cumulative assessment should be undertaken at a level of detail proportionate to the information available.</p>
TH11	<p>Page 4, Paragraph 10</p> <p>Castle Acre Parish Council concludes that the Drovers Solar Farm proposal (alongside that of the High Grove Solar Farms) would result in significant and enduring harm to the local landscape character, the historic villages of Castle Acre and South Acre and their heritage assets, archaeological resource, biodiversity and protected species, BMV agricultural land, public enjoyment and amenity use of the Nar Valley and its nationally important heritage setting.</p>	<p>The Applicant refers to its response to TH10 above.</p>
TH12	<p>Page 4, Paragraph 10</p> <p>While national policy supports renewable energy development, that support is explicitly conditional upon the avoidance of, or clear justification of harm to designated heritage assets and their setting, best and most versatile agricultural land, valued landscapes, ecological networks, and rural amenity. In this case we believe, the application fails to demonstrate that such harm has been adequately avoided, minimised, or convincingly justified, hence our communities continued objection to the proposal.</p>	<p>The Policy Compliance Document [REP1-014] demonstrates the Scheme's compliance with the relevant NPSs and the NPPF.</p> <p>Having regard to all important and relevant matters, the Applicant concludes in the Planning Statement [REP1-012] that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1 (2023) as well as those other benefits outlined in Section 9 of the Planning Statement [REP1-012].</p>



6. The Applicant's responses to Members of the Public

Reference	Comments	Applicant's Response
Sharron Morgan - further information [REP1-107]		
SM1	<p>Page 1</p> <p>My concern is not limited to whether routes technically remain open. Rather, it relates to whether the character and experience of using these routes will be fundamentally altered by the proposed development. The Environmental Statement acknowledges that access to Public Rights of Way and open space has implications for physical activity, wellbeing and human health. I believe insufficient weight has been given to the lived experience of those who use this landscape regularly for recreation, stress management and mental wellbeing.</p>	<p>The Applicant makes note of this comment. The Applicant acknowledges that access to PRoW and open space has implications for physical activity, wellbeing and human health. ES Appendix 6.8: Amenity and Recreation Assessment [APP-146] concludes that existing and new planting would temper impacts and change the character and amenity of some routes from open, long-distance views to more visually enclosed. It is recognised that some users may be deterred by this change in character. However, these effects are limited in extent and not significant in EIA terms, and would reduce over time through mitigation (including landscape screening and enhancements secured through the oLEMP [REP1-060]).</p> <p>In addition, access to existing PRoW would not be affected and some routes would be enhanced. The provision of additional and improved PRoW during the operational phase, including 3.5 km of new permissive paths within the order limits, is expected to encourage greater levels of walking and physical activity, which is linked to improved physical and mental health outcomes.</p> <p>The Applicant has applied the planning balance in the Planning Statement [REP1-012] and considers that the identified substantial benefits of the Scheme outweigh the residual harms that would arise.</p>
SM2	<p>Page 1</p> <p>Although routes may remain physically accessible, the introduction of extensive security fencing, battery storage infrastructure, inverter stations, transformers and associated equipment would materially change the experience of using these routes. I am particularly concerned about:</p> <ul style="list-style-type: none"> - The cumulative visual effect of long sections of security fencing. - Increased perception of enclosure along running and walking routes. - Loss of tranquillity. - Continuous operational noise from BESS infrastructure, inverters, transformers and cooling equipment. - Changes to wildlife movement and landscape character. - The cumulative impact of industrial infrastructure across a wide rural area. <p>The assessment appears to place emphasis on whether Public Rights of Way remain open. However, there is an important distinction between retaining access and retaining the recreational, psychological and wellbeing benefits currently associated with that access. A route that remains legally open but becomes dominated by security fencing, energy infrastructure and operational noise may no longer provide the same wellbeing benefits to users.</p>	<p>As mentioned above, access to existing PRoW would not be affected. However, some routes would be enhanced. Recreational enhancements include interpretation boards and the potential for new publicly accessible amenity space within the north-western Site area. In addition, the provision of additional and improved PRoW during the operational, including 3.5 km of new permissive paths within the order limits is expected to encourage greater levels of walking and physical activity, which is linked to improved physical and mental health outcomes. Taken in order of bullet points:</p> <ul style="list-style-type: none"> • The potential adverse landscape effects are detailed within ES Chapter 6: Landscape and Visual [AS-016]. The assessment includes visual receptors such as PRoW users and road users, within the Site and wider LVIA study area. The assessment considers all elements of the Scheme, including security fencing, which in the long term would be predominantly screened by the proposed landscape mitigation planting outlined within the oLEMP [REP1-060]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. • Some areas of the Site are generally visually enclosed, particularly where landform is relatively flat and/or gently rolling with field boundaries vegetated by existing mature trees, hedgerow and woodland, as noted within the LVIA baseline assessment. In these areas, internal Site views from roads and PRoW are short distance and mostly linear along vegetated routes, with landscape features either side. It is also noted that there are stretches of roads and PRoW where hedgerows do not exist and/or have gaps within them as a result of failed vegetation or loss through field access, which allows intermittent mid to longer distance views across adjacent agricultural fields. Alongside PRoW, the proposed maintenance and management of hedgerow heights at 3m serves to not only screen views towards the Scheme from PRoW within the Site but also reinforces the existing character of



Reference	Comments	Applicant's Response
		<p>the landscape within the Site and host landscape character area. Many of the PRoW are lined with existing hedgerow, trees, scrub and woodland blocks; the mitigation planting proposals use these same planting typologies to ensure the mitigation is in-keeping with the local landscape and therefore restores and reinforces the landscape character of the Site. This strategy serves to re-establish their historic character with established hedgerow and trees aligning them. The mitigation planting also serves to screen views towards the Scheme, limiting potentially significant visual effects in the long term and generally leading to a restoration and re-establishment of the landscape fabric that once aligned these routes. Open longer distance views such as those from PRoW South Acre RB7, looking across the Nar Valley northwards, and are retained as part of the Scheme.</p> <ul style="list-style-type: none"> • Tranquillity is considered as part of the landscape character baseline within the LVIA, which concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. • ES Chapter 10: Noise and Vibration [APP-059] details noise and vibration effects of the Scheme on residential receptors and PRoW. It is shown that noise effects from the operation of the BESS, substations' equipment, and the solar field inverters are not significant based on assessment against relevant standards and appropriate criteria. In particular, additional mitigation measures have been detailed (such as acoustic barriers along western boundary of the BESS and the Customer and National Grid Substation area) to provide acoustic shielding and reduce noise levels to acceptable limits at PRoWs, these measures have been outlined in the oOEMP [APP/7.8.2] which in turn is secured as a DCO requirement. Furthermore, these effects are based on worst-case assumptions (e.g., all equipment operation at 100% load simultaneously, no shielding from machinery etc.) which overestimate the noise effect than what is likely to be in practice. Therefore, while the BESS and substations' equipment may be audible in proximity to the area, it is not predicted to be at a level to cause annoyance or disturbance to quality of life or local environmental, and noise effects are determined to be not significant. • The operational area of the Scheme will be enclosed within perimeter fencing; however, dispersal impacts on wildlife, including mammals such as hare and deer, are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation, as detailed within Section 7.7 of ES Chapter 7: Ecology and Biodiversity [REP1-034] and secured within Design Principles, Parameters and Commitments [APP/5.8.2]. With regard to landscape character, the LVIA concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. • ES Chapter 6: Landscape and Visual [AS-016] outlines the approach and details that cumulative effects may arise as a result of effects associated with the Scheme combining with effects associated with other developments. The Scheme has been assessed strategically in the context of existing (as part of the baseline context) and proposed solar and energy infrastructure schemes, including NSIP scale projects Norfolk-wide. Only one development, High Grove Solar, has the potential to result in significant cumulative effects on Landscape and Visual within the associated LVIA Study Area. Section 6.11 details the



Reference	Comments	Applicant's Response
		<p>Cumulative Effects Assessment, which included High Grove Solar Farm, which concluded that there would be:</p> <ul style="list-style-type: none"> - significant adverse visual effects during construction for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave; and - significant adverse landscape effects during construction and operation on the E6 North Pickenham Plateau LCA.
SM3	<p>Page 1</p> <p>I therefore request that the Examining Authority gives careful consideration to:</p> <p>The effect of operational noise on users of Public Rights of Way and rural roads, not solely residential receptors.</p> <p>The cumulative impact of fencing, visual enclosure, noise and industrialisation of the landscape on recreational users.</p> <p>The effect on tranquillity and perceived rural character.</p> <p>The extent to which the human health assessment has adequately considered mental wellbeing impacts on regular users of the landscape.</p> <p>Whether additional mitigation measures could be required, including increased stand-off distances from Public Rights of Way, enhanced screening design, quieter equipment specifications and protection of open landscape views.</p> <p>In my view, the assessment should consider not only whether access remains available, but whether the quality and wellbeing value of that access is substantially diminished.</p>	<p>Potential visual impacts as a result of the Scheme upon PRow, including the various droves, are detailed within ES Chapter 6: Landscape and Visual [AS-016] and ES Appendix 6.8: Amenity and Recreation Assessment [APP-146].</p> <p>The potential adverse landscape effects are detailed within ES Chapter 6: Landscape and Visual [AS-016]. The assessment includes visual receptors such as PRow users and road users, within the Site and wider LVIA study area. The assessment considers all elements of the Scheme, including security fencing, which in the long term would be predominantly screened by the proposed landscape mitigation planting outlined within the oLEMP [REP1-060]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p> <p>Some areas of the Site are generally visually enclosed, particularly where landform is relatively flat and/or gently rolling with field boundaries vegetated by existing mature trees, hedgerow and woodland, as noted within the LVIA baseline assessment. In these areas, internal Site views from roads and PRow are short distance and mostly linear along vegetated routes, with landscape features either side. It is also noted that there are stretches of roads and PRow where hedgerows do not exist and/or have gaps within them as a result of failed vegetation or loss through field access, which allows intermittent mid to longer distance views across adjacent agricultural fields. Alongside PRow, the proposed maintenance and management of hedgerow heights at 3m serves to not only screen views towards the Scheme from PRow within the Site but also reinforces the existing character of the landscape within the Site and host landscape character area. Many of the PRow are lined with existing hedgerow, trees, scrub and woodland blocks; the mitigation planting proposals use these same planting typologies to ensure the mitigation is in-keeping with the local landscape and therefore restores and reinforces the landscape character of the Site. This strategy serves to re-establish their historic character with established hedgerow and trees aligning them. The mitigation planting also serves to screen views towards the Scheme, limiting potentially significant visual effects in the long term and generally leading to a restoration and re-establishment of the landscape fabric that once aligned these routes. Open longer distance views such as those from PRow South Acre RB7, looking across the Nar Valley northwards, and are retained as part of the Scheme.</p> <p>Tranquillity and rural character is considered as part of the landscape character baseline within the LVIA, which concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p> <p>'Stand-off' distances are included within the Scheme. Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features are outlined fully in ES Chapter 5: The Scheme [REP1-032], Design Principles, Parameters and Commitments [APP/5.8.2] and</p>



Reference	Comments	Applicant's Response
		<p>Design Approach Document [AS-009 - AS-011]. The aforementioned documents ensure the development areas within the Scheme would be offset from existing PRoW by a minimum of 15m, to respect the amenity and experience for PRoW users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Site which would enhance biodiversity within the Site. The potentially adverse effects identified within ES Chapter 6: Landscape and Visual [AS-016] take account of various mitigation measures embedded within the Scheme, which were designed to limit potentially adverse effects upon the landscape. These mitigation measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.2], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.2] and the oLEMP [REP1-060].</p> <p>The noise assessment is presented in ES Chapter 10: Noise and Vibration [APP-059] and includes assessment of construction and operational noise effects on PRoW within the Study area. Noise and vibration effects have been shown to be not significant on both residential receptors and PRoW based on the respective standards and applicable criteria.</p> <p>In terms of mental health, these matters are considered in ES Chapter 15: Human Health [APP-064]. The assessment concludes no significant adverse health effects in EIA terms. However, the Applicant recognises that some residents may feel unease as the environment changes. To address this, the Applicant will provide clear and accessible information and maintain ongoing engagement with the community through the Community Liaison Group, as secured through the oCEMP [APP/7.6.2], oOEMP [APP/7.8.2] and oDS [REP1-058]. This is intended to ensure that concerns are heard and responded to throughout construction, operation and decommissioning.</p>
SM4	<p>Page 1 Wildlife corridors versus human corridors</p> <p>The Solar development propose wildlife corridors around and between panel arrays. These can improve habitat connectivity for smaller mammals, birds, insects, and some protected species. However, wildlife corridors and human access corridors do not always function well together:</p> <ul style="list-style-type: none"> - Frequent human use can discourage some wildlife species. - Narrow fenced corridors can concentrate both wildlife and people into the same routes. - Animals may use maintenance tracks and rights of way as movement corridors. - Security fencing can alter natural movement patterns, particularly for larger mammals such as deer. - The key ecological question is not simply whether corridors exist, but whether they are wide enough, connected enough, and managed appropriately for the target species. 	<p>Impacts on mammal species in relation to nature conservation and biodiversity are considered within ES Chapter 7: Ecology and Biodiversity [REP1-034], which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant (in EIA terms) effects. Woodland habitats likely providing the focus of existing deer use will remain outside of the protection fencing, with wide corridors in particular along the droves (secured which will provide continued routes through the Site for deer. These routes will therefore remain largely unchanged from the existing position, along with relevant buffers. These commitments, including buffer distances associated with key corridors such as hedgerows and woodland edges, are made to improve ecological habitat in these areas, and are secured in the oLEMP [REP1-060].</p>
SM5	<p>Pages 1 and 2 Deer-human interactions and health & safety</p> <p>Where deer populations are present, fencing and corridor design can unintentionally create conflict points. Potential risks include:</p> <ul style="list-style-type: none"> - Deer becoming trapped between security fences and roads. 	<p>The operational area of the Scheme will be enclosed within perimeter fencing; however, dispersal impacts on wildlife (including deer) are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation, as detailed within Section 7.7 of ES Chapter 7: Ecology and Biodiversity [REP1-034] and secured within Design Principles, Parameters and Commitments [APP/5.8.2].</p>



Reference	Comments	Applicant's Response
	<ul style="list-style-type: none"> - Increased deer crossings at limited access points. - Vehicle collisions if movement routes are altered. - Stress and injury to deer if escape routes are restricted. - Increased contact between people, dogs, horses and wildlife on shared paths. - The issue is particularly important if large areas of agricultural land are enclosed because deer may continue to use historical movement routes that existed before development. 	
SM6	<p>Page 2</p> <ol style="list-style-type: none"> 1. What is the maximum volume of contaminated runoff that could be generated if more than one BESS container becomes involved? 2. How long can containment systems remain isolated during prolonged incidents? 3. What contaminants were assumed in the pollution modelling? 4. What groundwater vulnerability assessment has been undertaken for the site? 5. How close are containment structures to sensitive aquifers, drainage ditches, and watercourses? 6. How will emergency vehicles access the site if primary routes are blocked by a fire incident? 	<ol style="list-style-type: none"> 1. National Fire Chiefs Council (NFCC) Planning Guidance for BESS recommends that 180,000 litres of emergency water are anticipated to be used in a worst case scenario. As such, any attenuation will account for this volume plus accumulated rainwater, which will be factors in using a worst case 1 in 100-year event plus climate change factoring. The spacing of the BESS and the UL9540A testing regime minimises the potential for BESS to BESS propagation and the NFCC BESS firefighting strategy is that of a 'controlled burn' and containment. As such direct application of water on the BESS on fire is avoided and the BESS allowed to 'burn-out'. This minimises the potential for contamination of the firefighting water run-off. 2. The attenuation basin can remain isolated from the environment indefinitely. Post any incident the run-off water will be tested for contamination and treated accordingly. Should treatment in situ not be possible, then the water will be tankered off-site for treatment. 3. The exact make and model of the BESS units to be employed at the Site are yet to be determined, but such units will be UL9540A tested. The UL9540A includes a large-scale burn test in which a fully formed BESS is forced into combustion and the time elapsed between ignition and appearance of a flame on the external of the BESS measured. Most manufacturers will achieve a 1 hour plus burn time. Once the make and model of the BESS to be used is known at the detailed design stage (post-consent), the exact data will be used to inform the detailed Battery Safety Management Plan which will be produced substantially in accordance with oBSMP [APP-194]". Dispersion Modelling will primarily focus on Hydrogen Fluoride, this being the most significant component in any smoke resulting from a BESS fire, this will be reported on in future iterations of the oBSMP [APP-194]. 4. Paragraph 12.8.128 of ES Chapter 12: Water Resources [APP-061] assesses the risk of battery fire to all water resources receptors, including groundwater, as negligible. Additionally, ES Appendix 12.3: Water Framework Directive Assessment [APP-171] considers the risk of degradation of groundwater bodies and as such considers the vulnerability of groundwater during all phases of the Scheme. 5. There are no watercourses or drainage ditches within the vicinity of the containment structures. Whilst the Scheme is located on a principal aquifer, the containment structures will be designed with appropriate safeguards to protect groundwater quality. The detailed design of the closed drainage system will incorporate suitable containment, interception and treatment measures to prevent the release of contaminants to the ground, as outlined in the oCEMP [APP/7.6.2] and Design Principles, Parameters and Commitments [APP/5.8.2]. 6. There are several access points to the Scheme. As such, should one access route or road be obstructed, then alternative access for emergency vehicles would be available.



Reference	Comments	Applicant's Response
SM7	<p>Page 2</p> <p>How will deer and other large mammals move through the site after fencing is installed?</p> <p>Have cumulative effects of fencing on wildlife movement and public access been assessed?</p> <p>What monitoring is proposed to verify that wildlife corridors remain functional after construction?</p> <p>Where exactly are the proposed mammal gates and hedgehog through-routes shown on the plans, what spacing will they have, and how will their effectiveness be monitored throughout the operational life of the project?</p> <p>If wildlife corridors are concentrated around field margins and hedgerows, how will hedgehogs move between compartments where security fencing surrounds solar arrays and BESS infrastructure?</p>	<p>Woodland habitats likely providing the focus of existing deer use will remain outside of the security fencing, with wide corridors in particular along the droves which will provide continued routes through the Site for deer. This is presented in Appendix 1: Green Infrastructure Strategy Plans of the oLEMP [REP1-060]. These routes will therefore remain largely unchanged from the existing position.</p> <p>Cumulative impacts on mammal species in relation to nature conservation and biodiversity are considered within ES Chapter 7: Ecology and Biodiversity [REP1-034], which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. The Applicant has committed to retaining the alignment of existing PRoW within the Site and to provide 3.5km of new permissive paths that will contribute to the wider network of footpaths and bridleways in the area and facilitate greater public access to the countryside. Cumulative impacts on pedestrian delay for users of PRoW have been assessed within ES Chapter 9: Transport and Access [REP1-036], which has concluded negligible effects.</p> <p>Section 7.5 of the oLEMP [REP1-060] details the outline ecological monitoring strategy. The outline ecological monitoring strategy includes the details of the habitat, botanical, soil, and bird monitoring proposed during the operational phase of the Scheme. It also acknowledged that additional survey elements may be included in the detailed monitoring strategy including bat surveys and opportunities to link up with organisations such as Norfolk Wildlife Trust to carry out further monitoring.</p> <p>Exact locations and specifications of mammal gates are not specified at this stage of the design process, and will be determined during the detailed design stage, pre-construction, should the order for development consent be granted for the Scheme, albeit the Scheme will be designed to include existing vegetated corridors and routes where these are present and cross fencing lines. These commitments are made to improve ecological habitat in these areas, as secured in the oLEMP [REP1-060]. Monitoring of wildlife corridors has been responded to in the previous paragraph.</p> <p>As detailed in the Design Principles, Parameters and Commitments [APP/5.8.2], clearances above ground or mammal gates will be included within the deer fence to permit the passage of wildlife. Deer fencing is proposed fencing option for the Solar PV Site, so there will be free movement of hedgehogs across the majority of the Site.</p>
SM8	<p>Page 2</p> <p>Please provide the following information</p> <ul style="list-style-type: none"> - A plan showing every hedgehog/mammal gate location. - The dimensions of the openings. - The maximum distance between openings. - Details of monitoring after construction. <p>What remedial action will occur if monitoring shows hedgehogs are being excluded from parts of the site</p>	<p>Exact locations and specifications of mammal gates are not specified at this stage of the design process, and will be determined during the detailed design stage, pre-construction, should the order for development consent be granted for the Scheme.</p> <p>As detailed in the Design Principles, Parameters and Commitments [APP/5.8.2], clearances above ground or mammal gates will be included within the deer fence to permit the passage of wildlife. Deer fencing is proposed fencing option for the Solar PV Site, so there will be free movement of hedgehogs across the majority of the Site.</p>
SM9	<p>Page 2</p> <p>Has the applicant assessed the effect of operational BESS and inverter noise on users of Public Rights of Way, runners, walkers and cyclists, or has the assessment primarily focused on residential receptors?</p>	<p>The noise assessment is presented in ES Chapter 10: Noise and Vibration [APP-059] which includes assessment of construction and operational noise effects on PRoW within the Site study area. Noise and vibration effects have been shown to be not significant in EIA terms on both residential receptors and PRoW based on the respective standards and applicable criteria. While the Scheme may be audible at some closest receptors and PRoW to the Scheme, it is unlikely to generate noise levels at receptors or PRoW that will cause disturbance or annoyance and has been determined to result in non-significant noise and vibration effects.</p>



Reference	Comments	Applicant's Response
Dr Mark Holmes – Written Summary of oral representations made at OFH1 and ISH1 [REP1-105]		
MH1	<p>Page 2</p> <p>I want to clarify that this proposed industrial-scale droves solar farm has the potential to seriously damage this very same area of sensitive & highly important habitats, that is both continuous with and FUNCTIONALLY LINKED to the nearby BRECKLAND SPA – the Breckland Special Protection Area.</p>	Natural England has confirmed that the Site does not constitute functionally linked land.
MH2	<p>Page 2</p> <p>The TWO very strong & legitimate OBJECTIONS AGAINST the droves solar project that I would like to brief you on & update you on today ARE ;</p> <ol style="list-style-type: none"> 1. The presence of the very rare & fully protected STONE CURLEW bird species on this proposed solar farm site – Stone Curlews were recorded here in both 2024 & 2025. & 2. The already impressively HIGH BIODIVERSITY but still increasing BIODIVERSITY levels, PLUS future BIODIVERSITY POTENTIAL, of this site which could be irreparably damaged by this massive solar farm project, 	The Applicant notes these objections to the Scheme and has responded to them in full in rows MH3 and MH4 of this document.
MH3	<p>Page 2</p> <p>FIRSTLY regarding Stone Curlews. This extremely rare (circa 300 breeding pairs in UK) bird species is a fully protected Schedule 1 British breeding bird – protected under the Countryside & Wildlife Act of 1981. Multiple sightings of Stone Curlews have now been made in the Droves Solar farm project area IN 2024 AND 2025.</p> <p>In 2025 a pair of adult birds was seen in the Spring, and then an apparent FAMILY party of 4 birds was seen that Autumn. This is consistent with successful breeding of a bird species that is known to be very illusive. Terry Jermy local MP for South West Norfolk, in his excellent submission, pointed out that because of crop rotation birds may move with this rotation & hence only be recorded at a particular site every 4 or 5 years. (Indeed our Stone Curlews may well move between the Droves project area and the nearby Breckland SPA, Special Protection Area).</p> <p>I would therefore propose that FOR the Droves site a minimum of 5 years of professional & licensed Stone Curlew recording work is carried out to confirm (or exclude) Stone Curlew breeding on this site, BEFORE any final decision on the Droves Solar project is made.</p>	<p>The Applicant notes that confirmation has been received from Natural England that the information provided is sufficient to conclude that the Scheme would not result in any likely significant adverse effects on the interest features of Breckland SPA (including Stone-curlew). Nonetheless, it is noted (in line with comments from Natural England) that Stone-curlew is a protected species in its own right under Section 1 of the Wildlife and Countryside Act 1981 (in line with all wild bird species), such that any intentional or reckless killing, injury, taking, damage or destruction of nests, obstruction or prevention of access to nests or damage or destruction of eggs would represent an offence. In addition, Stone-curlew is listed on Schedule 1 of that Act (in line with a number of bird species), such that it is also protected from disturbance whilst building a nest, in or near a nest containing eggs or young, or disturbance of dependent young.</p> <p>It is acknowledged that crop rotations will affect the specific locations of any nesting activity within a particular year; however, in view of the size of the Site, varied crops were present (including those suitable for Stone-curlew) during the survey year such that any significant or sustained use of the Site would have been anticipated to be recorded during the surveys undertaken.</p> <p>In line with other bird species, mitigation measures (including timing of works) are set out in the oCEMP [APP/7.6.2], which would prevent any potential offence in regard to Stone-curlew or any other bird species. Taken as a whole, incorporating the mitigation proposed, the impacts of the Scheme on bird species have been specifically considered within Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [REP1-034] which concludes that no likely significant effects (in EIA terms) are anticipated.</p>
MH4	<p>Page 3</p> <p>SECONDLY I would like to comment regarding the already HIGH and increasing levels of Biodiversity of this proposed Solar farm site. The combination at this site of both important Breckland habitat which is FUNCTIONALLY LINKED to the nearby Breckland SPA (Special Protection Area) plus the proximity of, & continuity with, the River Nar SSSI ensures an</p>	<p>Natural England has confirmed that the Site does not constitute functionally linked land in relation to Breckland SPA.</p> <p>Embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse are secured within the oCEMP [APP/7.6.2]. ES Chapter 7: Ecology and Biodiversity [REP1-034] concludes that, following the implementation of the</p>



Reference	Comments	Applicant's Response
	<p>outstanding level of biodiversity. (The whole Breckland area is of course known to be a biodiversity hotspot).</p> <p>Many protected & scarcer species have been recorded in the immediate area of the planned Drovers solar project. MAMMALS include Red Deer, Otters, Polecats (a protected species which arrived in last 5 years), Harvest Mice, Water Voles, Hares & Badgers. As well as Stone Curlews, BIRDS recorded include the larger Eurasian Curlew (Breckland being one of the most important lowland breeding strongholds for this species in the UK), Lapwings, Cuckoos, Spotted Flycatchers, Barn Owls, Quail, Goshawks, Kingfishers (breeding on or near the River Nar), Green Sandpipers & Crossbills. 31 species of BUTTERFLY have been recorded including the recent arrival of the rare Purple Emperor butterfly (this is more than half of the British Butterfly list). Other INSECTS include the localised Green Tiger beetle & many species of solitary bee – at least 2 solitary bee species have only recently arrived in Southacre & formed large breeding colonies. (Solitary bees are of course very important pollinators). I believe the FLORA of the area is understudied and at least 4 ORCHID species occur – Bee, Pyramidal, Common Spotted & Southern Marsh Orchids.</p> <p>The high biodiversity & biodiversity potential of the whole Nar Valley area is one of the reasons why a large-scale REWILDING project has been funded just downstream at Westacre.</p>	<p>embedded mitigation and additional mitigation proposed, there will be no likely significant effects (in EIA terms).</p> <p>The Scheme will deliver biodiversity gains (which are calculated to be well in excess of 10% using the government's metric), as set out within the Biodiversity Net Gain Assessment Report [REP1-048], and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme in relation to the existing biodiversity levels recorded.</p> <p>The Applicant notes the comments in regard to the presence of faunal species, including mammals and birds within the DCO (as would be anticipated on any area of land of similar scale) and offsite within Nar Valley area and Southacre, which are outside of the DCO and will remain unaffected. Appendix 7.2: Baseline Ecological Survey Report [APP-148] details the results of survey work undertaken at the site, which confirms the presence of a number of faunal species (including mammal and bird species) at the site, including some of those listed, where suitable habitats are present (albeit noting that much of the site, including the majority of the affected areas) is dominated by intensive arable land with key features offering habitats for the majority of species restricted to field boundary habitats, hedgerows, woodlands and associated vegetation which will be retained and enhanced.</p> <p>Key habitats such as hedgerows, woodlands and trees will be retained and ecological safeguarding measures, such as appropriate buffers, are set out within the oCEMP [APP/7.6.2] to safeguard and avoid adverse impacts, which in turn will ensure available habitats and corridors remain for use by the faunal species listed. Ongoing management and monitoring measures are set out within the oLEMP [REP1-060] which will ensure long term habitats and enhancements for a range of species including mammals and birds, whilst proposed mitigation and compensation measures in respect of faunal species have been specifically considered within the ES Chapter 7: Ecology and Biodiversity [REP1-034], which concludes no significant effects are anticipated.</p>
MH5	<p>Page 3</p> <p>I would therefore propose more extensive HABITAT REGULATIONS ASSESSMENTS over the next couple of years by multiple experts who specialise in the various groups of fauna & flora BEFORE any final decisions are made on this massive solar project, a project which could have serious immediate and long term negative consequences for this area of high and increasing species biodiversity.</p>	<p>Natural England have stated within its Relevant Representation [RR-038] and the corresponding SoCG with Natural England [REP1-022] that “we concur with the conclusion of the <i>Shadow Habitats Regulations Assessment (SHRA)(APP/7.3)</i> that likely significant effects on European sites can be ruled out, either alone or in combination with other plans or projects and that there is therefore no need to progress to Stage 2 Appropriate Assessment”</p> <p>The Applicant does not, therefore, consider that further Habitats Regulations Assessments are necessary for the Scheme.</p>
MH6	<p>Page 4</p> <p>1/ Re. Stone Curlews – How will accurate survey work be done for Stone Curlews on a licensed & professional basis (this being a Schedule 1 protected bird) both now & for the suggested 5 year recording period? (Current Stone Curlew ecological survey reporting – arranged by the applicant – is clearly already incomplete & out of date).</p>	<p>The Applicant refers to the response to MH3 above on the matter of Stone Curlews.</p>
MH7	<p>Page 4</p> <p>2/ Re. High Biodiversity value of site (an area that is functionally linked to the Breckland SPA) - How will extensive Habitat Regulation Assessments be performed to guarantee that proper & expert surveys are done on ALL groups of fauna & flora ? (Current ecological reports – arranged by the applicant – have more of a scope quality rather than the expected in depth expertise approach for all groups of natural history. For example, if we take insects, one</p>	<p>The Applicant notes this comment, which is fully addressed in the Applicant's responses to MH4 and MH5 above.</p> <p>Potential impacts on ecology and biodiversity are fully assessed in ES Chapter 7: Ecology and Biodiversity [REP1-034], including with specific reference to international, national and locally designated sites of ecological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats, which concludes that following the implementation of the</p>



Reference	Comments	Applicant's Response
	would expect far more survey work on bee, beetle, moth, & butterfly species – to reiterate Breckland supports many very rare species of insect).	embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects.
MH8	Page 4 3/ As I raised at the early May Hearing, will all future references to “Curlews” differentiate as to whether they are referring to the larger & localised Eurasian Curlew or the much rarer Schedule 1 protected Stone Curlew ?	The Applicant notes this comment and would agree that for clarity, where common names are used, that the full term Eurasian Curlew should be used in reference to <i>Numenius arquata</i> to ensure distinction from the Stone-curlew <i>Burhinus oedicnemus</i> .
MH9	Page 4 4/ Can I again ask that this above level and indepth quality of ecological survey work is carried out for an appropriate duration of time before any final decision is made on this industrial scale solar farm project ?	The Applicant notes this comment and has fully addressed it in its response to MH7 above.
MH10	Page 4 FINALLY can I please confirm that I would like to talk/submit further oral information (as required) at the next hearing scheduled for the w/c 7th September 2026.	The Applicant notes this comment and looks forward to future engagement with Dr Holmes during the examination, including at hearings.
Philip Morton – Written Representation [REP1-106]		
PM1	Page 1 I fully support the solar farm as it will help provide a supply of sustainable electricity and remove our dependency on external factors such as the oil and gas markets	The Applicant welcomes this support of the Scheme.
Gerald Bernard Allen – Written Representation [REP1-108]		
GA1	Page 1 This proposal should be rejected for 2 reasons (a) The waste of high grade agricultural land (wind can be located out a sea with no such effect) and (b) the effect operations at a frontline RAF base which is vitally needed with Russia's designs on attacking democratic Europeans Countries cannot be acceptable - anything which affects the "lightening" response from the base should be rejected instantly.	Although the Scheme does include BMV land, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach in its site selection process and can justify its inclusion given the lack of a suitable alternative on brownfield land, as set out in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053] , and the temporary nature of the Scheme, as set out in ES Chapter 11: Soils and Agriculture [AS-018] . Paragraph 9.4.15 of the Planning Statement [REP1-012] sets out the use of BMV land within the cumulative impacts section of the planning balance. This is afforded neutral weight in the planning balance. The Applicant is progressing discussions with the Defence Infrastructure Organisation(DIO)/Ministry of Defence (MoD) to ensure the Scheme can be developed without impeding the DIO/MoD's activities. The Applicant has had pragmatic and helpful discussions with the DIO/MoD and is confident of reaching an agreed position during the course of the examination, such that the DIO/MoD's objection can be withdrawn.
Antony Morgan – Further information [REP1-101]		
AM1	Page 1 The principal concerns are the following: The loss of productive agricultural land and its implications for long-term food security.	The Applicant has responded to the point on grid connection at reference NCC1, under the heading 'Grid Connection', of the Applicant's Response to Relevant Representations [REP1-067] . The Applicant has addressed this point in further detail in response to NET8 of this document. The Applicant has responded to the point on the loss of agricultural land and food security under the issue theme of 'Food Security' in Table 7.2 (page 304) of the Applicant's Response to Relevant Representations [REP1-067] .



Reference	Comments	Applicant's Response
	<p>Uncertainty regarding the project's grid connection status and overall deliverability.</p> <p>The environmental impact of extensive soil disturbance, transport, storage and reinstatement.</p> <p>Potential long-term damage to soil structure, fertility and microbiological health.</p> <p>The industrialisation of a rural landscape through the introduction of large solar arrays, fencing, battery storage facilities and associated infrastructure.</p> <p>Harm to landscape character, heritage settings and visual amenity.</p> <p>Reduced enjoyment of public rights of way and open countryside.</p> <p>Concerns that proposed wildlife corridors may not provide genuine ecological connectivity and could potentially direct wildlife towards busy roads and other hazards.</p> <p>Questions regarding the long-term management, ownership, decommissioning and restoration of the site.</p> <p>Taken together, these concerns raise significant questions regarding the environmental sustainability, agricultural impact, ecological consequences and overall suitability of the proposal. These matters should be fully resolved before any planning consent is granted.</p>	<p>The Applicant has set out measures to control soil handling, storage and reinstatement in the oSMP [REP1-062] during construction, operation, maintenance and decommissioning phases, which is secured via Requirement 17 of the draft DCO [APP/3.1.2]. This will ensure that soil structure, quality and function are protected and restored. As described in ES Chapter 11: Soils and Agriculture [AS-018], the installation of the mounting structure piles for the solar arrays involves very limited disturbance to the land as the piles are simply pushed into the ground. ES Chapter 11: Soils and Agriculture [AS-018] describes the limited amounts of land that are disturbed for the construction process. During the operation and maintenance phase, the land cover will be undisturbed with benefits for soils including for soil organic carbon (see paragraphs 11.8.78 to 11.8.86 of ES Chapter 11: Soils and Agriculture [AS-018]).</p> <p>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4.1] sets out the strategy for mitigating impacts arising from the Scheme on archaeological features present and concludes that there will be no significant effects.</p> <p>The Applicant has responded to the point on industrialisation at reference CAPC2 of the Applicant's Response to Relevant Representations [REP1-067].</p> <p>The Applicant has responded to the points on landscape character, heritage settings and visual amenity at reference CAPC9 of the Applicant's Response to Relevant Representations [REP1-067].</p> <p>The Applicant has responded to the point the enjoyment of PRowS and open countryside at reference NCC14 of the Applicant's Response to Relevant Representations [REP1-067].</p> <p>Paragraph 7.7.26 of ES Chapter 7: Ecology and Biodiversity [REP1-034] sets out how the Scheme will strengthen existing movement corridors as well as improve connectivity throughout the Scheme through the creation of new hedgerow and tree lines. This would contribute to improving foraging opportunities, promoting wildlife and biodiversity.</p> <p>All details on the decommissioning of the Scheme, including Site restoration and management, are included within the oDS [REP1-058].</p>
AM2	<p>Page 1</p> <p>1.Solar Power Efficiency and Land Use</p> <p>Solar technology remains relatively inefficient compared with other forms of electricity generation. A significant amount of land is required to generate meaningful levels of power, particularly in the UK where sunlight levels are limited for much of the year.</p> <p>The proposed development would cover a large area of productive agricultural land, yet generation output will fluctuate significantly depending on weather conditions, season, and daylight hours. This raises the question of whether such a large land take is justified when more energy-dense technologies are available.</p>	<p>Section 3.2 of the Statement of Need [APP-042] explains that government's analysis indicates that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.</p> <p>Government policy on solar energy is included at Section 3.3 of the Statement of Need [APP-042]. Paragraph 3.3.5 explains that since "<i>solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation</i>" solar is also expected to bring forwards affordability benefits for consumers (NPS EN-3, paragraph 2.10.13). Further information on the productivity (load factor) and efficiency of solar generation, which underpins government's support for large-scale solar generation, can be found in Section 6.8 of the Statement of Need [APP-042].</p> <p>Figure 8-2 of the Statement of Need [APP-042] shows that a portfolio of low carbon generation which includes solar, wind, and baseload supplies is capable of closely matching a future projection of national electricity demand on a month-average level, including in winter months.</p> <p>The Scheme includes BESS as associated development to support the operation of the Solar PV Sites by storing energy when it is in abundance and releasing it to the grid when it is needed more, to increase the proportion of national electricity demand met by low-carbon supplies at all times of the year. At times when the BESS is not supporting the operation of the Solar PV Sites, it may be useful for the BESS to support the national supply and demand balance by importing directly from the grid rather than from the co-located solar.</p>



Reference	Comments	Applicant's Response
AM3	<p>Page 1</p> <p>2. Winter Performance</p> <p>During winter months, solar generation is at its weakest when electricity demand is often at its highest. Snow, frost, prolonged cloud cover and shorter daylight hours can significantly reduce output. In periods of poor weather, solar panels may generate only a fraction of their rated capacity, raising concerns about reliability and overall effectiveness.</p>	<p>The Applicant refers to its response in row AM2 above.</p>
AM4	<p>Page 1</p> <p>3. Carbon Footprint of Manufacturing</p> <p>While solar power is often described as low-carbon, the manufacturing process should not be ignored. Solar panels require energy-intensive production processes involving silicon extraction, purification and high-temperature furnaces. Most panels are currently manufactured overseas using industrial processes that rely heavily on conventional energy sources.</p>	<p>ES Chapter 13: Climate Change [REP1-040] quantifies manufacturing emissions from solar panels, including energy-intensive processes like silicon extraction (8,785 tCO₂e), glass production (35,009 tCO₂e), and aluminium smelting (36,819 tCO₂e). Overseas manufacturing in China is explicitly acknowledged (see paragraphs 13.4.12 and 13.9.107), with appropriate carbon intensity factors applied.</p>
AM5	<p>Page 1</p> <p>Questions therefore remain regarding: The total embodied carbon of the panels used in this project. The emissions associated with manufacturing, shipping and installation. How long it will take for the project to achieve genuine carbon payback.</p>	<p>Regarding the embodied carbon, please see response to AM4 above. The construction, operation, and decommissioning of energy infrastructure will inevitably lead to GHG emissions (e.g. embodied carbon in products, transport, replacements and end-of-life processing) and ES Chapter 13: Climate Change [REP1-040] quantifies these. However, the Scheme does not actively remove GHG emissions from the atmosphere. Significance is therefore judged on alignment with the net-zero trajectory and evidence that all reasonable measures to reduce emissions have been taken, not on achieving a particular “payback year”. Over its 60-year operational phase generating 37.22 TWh (see paragraph 13.9.92), the Scheme demonstrates significant net carbon benefits when compared to grid-average generation, contributing meaningfully to UK carbon budgets and the Net Zero 2050 target (see paragraphs 13.9.131 to 13.9.134).</p> <p>To provide context to the Scheme’s contribution to decarbonisation, ES Chapter 13: Climate Change [REP1-040] includes a transparent comparison between the Scheme’s operational carbon intensity and electricity supplied by the UK grid in the Scheme’s anticipated first operational year (2033). The difference is presented as “avoided” grid emissions. This contextual comparison does not form part of the Scheme’s GHG inventory and is not used to determine significance.</p> <p>However, it is important to note that the Department for Energy Security and Net Zero (DESNZ) grid carbon intensity used for comparison does not include GHG emissions from imported materials as part of the UK’s national inventory, i.e. the grid emissions considered are UK territorial emissions only. This means that the emissions generated outside of the UK territory are not accounted for in the DESNZ grid carbon intensity projections used to assess the Scheme savings.</p> <p>In contrast, the Scheme's lifecycle assessment accounts for global embodied and freight emissions for products such as BESS, PV modules, transformers, and cabling. This discrepancy results in an asymmetrical comparison that underestimates the Scheme's GHG savings. Specifically:</p> <ul style="list-style-type: none"> • The Scheme's assessment includes: Global embodied carbon (e.g., BESS manufacturing in China: 264,000 tCO₂e), international freight (29,380 tCO₂e), and all lifecycle emissions (paragraph 13.9.107); and • The DESNZ grid factor includes: Only UK territorial operational emissions from electricity generation. <p>This means the Scheme is assessed against a baseline that excludes the very emissions categories (embodied carbon, WTT, international supply chains) that dominate the Scheme's own inventory.</p>



Reference	Comments	Applicant's Response
		<p>The comparison therefore systematically understates the Scheme's carbon savings relative to grid-average generation.</p> <p>Moreover, the GHG emissions methodology used in the assessment is limited in that it only compares electricity generated by the Scheme to the equivalent electricity available via the national grid. This approach does not fully account for the broader carbon benefits that accrue from the provision of renewable energy as part of an extensive electricity supply system.</p> <p>The limited comparison of generated electricity against equivalent grid intensity ignores the broader benefits of displacing fossil fuel use in transport, heating, and industrial processes. In practice, the energy use from these sectors that the Scheme displaces may be significantly more carbon-intensive than the national grid at any given time. This means the carbon savings of the Scheme presented in ES Chapter 13: Climate Change [REP1-040] is likely to be much greater than assessed.</p>
AM6	<p>Page 1</p> <p>4. Battery Energy Storage System (BESS) The proposal includes a Battery Energy Storage System (BESS), which raises several concerns. Battery systems degrade over time and may require replacement multiple times during the lifetime of the solar farm. Questions remain regarding:</p> <p>The environmental impact of battery manufacture and disposal.</p> <p>How replacement batteries will be sourced and recycled.</p> <p>The long-term carbon footprint of repeated battery replacement.</p> <p>Whether the batteries will primarily be charged by solar generation or by electricity imported from the grid during periods of low solar output.</p> <p>If the batteries rely heavily on grid electricity, the overall environmental benefit of the project becomes less clear.</p>	<p>Under current UK legislation, end-of-life BESS infrastructure is controlled under The Waste Batteries and Accumulators Regulations 2009. These regulations require battery producers to receive, sort, and suitably handle batteries and deliver to an approved battery treatment operator for treatment and recycling. This requirement will be secured ahead of the Scheme's operational phase, based substantially in accordance with the detail provided in the oOEMP [APP/7.8.2] to ensure it is undertaken as legally required throughout the operational phase of the Scheme, as well as within the oDS [REP1-058] for the decommissioning phase of the Scheme. The waste impacts from end of life battery units has been assessed in ES Chapter 16: Other Environmental Matters [APP-065], with no likely significant (in EIA terms) effects concluded.</p> <p>The sourcing of batteries will be undertaken in accordance with the measure set out with in the oESSCS [APP-195]. The recycling of batteries would be undertaken in accordance with the relevant UK legislation at the time of disposal and in accordance with the Waste Management Strategy which will be developed as part of the detailed Operational Environmental Management Plan, as secured by Requirement 14 of Schedule 2 of the draft DCO [APP/3.1.2] and to be substantially in accordance with the oOEMP [APP/7.8.2].</p> <p>The environmental impact of battery manufacture has been assessed in ES Chapter 13: Climate Change [REP1-040], which has considered the GHG emissions associated with the manufacture and supply of the BESS and stated that this accounts for 60.76% of the Scheme's construction emissions. The replacement of the batteries is assumed to take place every ten years for the purpose of the GHG assessment, which represents a worst-case scenario. As well as the replacement of the components themselves, the embedded emissions from the packaging materials to deliver replacement batteries has been considered in the GHG assessment. The environmental impact and long term carbon footprint of battery use and replacement has been assessed within the ES.</p> <p>Section 5.11 of the Statement of Need [APP-042] explains the role of electricity storage in supporting a transition to a clean power system. The BESS will support the operation of the Solar PV Sites by storing energy when it is generated in abundance and releasing it to the grid when it is needed more. At times when the BESS is not supporting the operation of the Solar PV Sites, it may be useful for the BESS to support the national supply and demand balance by importing directly from the grid rather than from the co-located solar.</p> <p>It is expected that any energy from the grid which is stored in the BESS through import charging would be generated from low carbon sources. However, in practice, how the BESS would operate at any time would depend upon a large number of factors including national demand, the weather, and the evolving composition of the future GB generation fleet. Therefore, it is not possible to say whether the BESS would primarily store imported, or solar generated energy. For this reason, the exact nature of emissions going into charging it has not been fully assessed. More information on</p>



Reference	Comments	Applicant's Response
AM7	<p>Page 1</p> <p>5. Financial Cost and Value for Money The project is reportedly valued at around £1 billion.</p> <p>Given rising construction costs, inflation, supply-chain pressures and future maintenance requirements, there is a risk that final costs could be significantly higher.</p> <p>Local residents deserve clarity on:</p> <p>The full lifetime cost of the project. Who ultimately bears those costs. Whether equivalent carbon reductions could be achieved more effectively through alternative technologies.</p>	<p>co-located solar and BESS operation, and the carbon benefits delivered by BESS, is available in Section 6.9 and Section 6.10 respectively of the Statement of Need [APP-042].</p> <p>The Funding Statement [AS-005] references the cost of the Scheme to be around £900 million to £950 million.</p> <p>Just as the case may be with other infrastructure projects, costs may increase beyond that modelled for at this stage, noting that this should not present concern to members of the public due to this being a private commercial venture supported by national government ambition and targets.</p> <p>The cost of the Scheme will be entirely privately funded by the Applicant – no money is required from the public for the Scheme.</p> <p>Paragraph 3.3.5 of the Statement of Need [APP-042] explains that since “solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation” solar is also expected to bring forwards affordability benefits for consumers. Further, “Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free” (NPS EN-3, paragraphs 2.10.13 and 2.10.14).</p> <p>Figure 9-2 of the Statement of Need [APP-042] shows that renewable generation technologies, including solar generation, are much less expensive on a levelised cost basis than technologies which are reliant on fossil fuels, even when fuel input costs are included at a low level.</p>
AM8	<p>Page 1</p> <p>6. Grid Connection Uncertainty</p> <p>There appears to be uncertainty regarding the project's grid connection status.</p> <p>Without a guaranteed connection date, there is a risk that the development could be approved and constructed before sufficient grid capacity is available.</p> <p>Residents should be informed about: The current connection status. Expected connection timescales.</p> <p>The likelihood of delays caused by existing grid bottlenecks.</p>	<p>The Secretary of State Decision Letter for the Morgan Offshore Wind Project Generation Assets (EN010136) (Available online at https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010136-001169-Morgan Offshore Wind Project Generation Assets Secretary of State for Energy Security and Net Zero Decision Letter.pdf) responded to concerns raised by Natural England regarding the separation of the Generation Assets from the Transmission Assets, noting concerns with regard to the risk of stranded assets and suggesting a Requirement in the DCO to prevent commencement until the necessary further consents (i.e. for the grid connection) had been obtained. Paragraph 4.18 of this Decision Letter states that the ExA noted that the Generation Assets would not be commercially feasible without certainty regarding its grid connection, and construction would therefore not take place until this. Paragraph 4.23 of the Secretary of State Decision Letter states that “The Secretary of State agrees with the ExA that the risk of the wind farm becoming a stranded asset is unrealistic.”</p> <p>The Applicant agrees with the Secretary of State's handling of this issue and notes that a similar commercial argument applies to the Scheme.</p> <p>Government is clear that the Clean Power plan and Connections Reform is not about stopping projects, but it is instead about prioritising projects for 2030, while maintaining a robust pipeline beyond 2030. Projects which continue to demonstrate they are 'ready' are expected to be re-prioritised, especially as Government continues to refine its criteria for 'strategic alignment'. It is also anticipated that some projects currently in the queue may drop out. Therefore, government is “expecting an increase in planning applications with the Clean Power 2030 target” (See Section 2.9 of the Statement of Need [APP-042]).</p> <p>The Applicant therefore identifies no policy conflicts in relation to the Scheme receiving consent prior to confirmation of its grid connection, and does not agree that there is a risk that construction would commence before such a point.</p> <p>The Applicant is developing the Scheme with the aim of securing a Gate 2 connection in a future NESO connections prioritisation round, and will keep local representatives and communities updated as development progresses.</p>



Reference	Comments	Applicant's Response
		<p>In relation to the likelihood of delays given grid bottlenecks, the Applicant notes that not consenting the Scheme would be a higher-risk approach than consenting the Scheme. This is because, as stated above, if consented, the Scheme would aim to secure a Gate 2 connection in a future NESO connections prioritisation round. This would provide NESO with more options to “<i>prioritise projects needed for 2030, while maintain[ing] a robust pipeline beyond 2030</i>” (Clean Power 2030 Action Plan, page 11). It is also anticipated that some projects currently in the connections queue may drop out, demonstrating the need to have projects ready to be prioritised to ensure that the capacity ranges remain achievable.</p> <p>The Applicant has also addressed this point in further detail in response to NGET8 of this document.</p>
AM9	<p>Pages 1 and 2</p> <p>7. Alternative Technologies</p> <p>Before sacrificing large areas of agricultural land, alternative energy solutions should be properly considered.</p> <p>New technologies such as Small Modular Reactors (SMRs) offer the potential to generate large quantities of low-carbon electricity from a much smaller land footprint while operating continuously regardless of weather conditions.</p> <p>Similarly, wind power generally delivers higher energy output per acre and allows farmland to remain in agricultural use.</p> <p>The question must therefore be asked:</p> <p>Why is large-scale solar development being prioritised on productive farmland when alternative low-carbon technologies may offer greater efficiency, reliability and lower land use?</p>	<p>Section 2.9 of the Statement of Need [APP-042] sets out the government's Clean Power capacity ranges. These challenging ranges apply across all low-carbon technologies, including wind and nuclear power (i.e. low-carbon technologies other than solar). The capacity ranges guide prioritisation of the connection queue over the next ten years to achieve and maintain the government's Clean Power Target (see paragraph 2.9.7 of the Statement of Need [APP-042]). Figure 5-3 of the Statement of Need [APP-042] indicates one pathway of low carbon generation technologies to 2050 which meets the UK's legally binding net zero target.</p> <p>It is therefore the case that all low-carbon technologies are needed to play their part to get to Net Zero. Different technologies in different locations are ways of making additional progress towards net zero, not alternative ways of making the same progress as the Scheme.</p> <p>The effective moratorium on English onshore wind development, introduced in 2013, was lifted only at the end of 2025. The Applicant knows of no local proposals for small or large nuclear reactors near to the Order limits. Sections 5.6 and 5.7 of the Statement of Need [APP-042] provide evidence to support the Applicant's position that local nuclear or onshore wind schemes would not be deliverable in the same timeframes as the Scheme, if indeed they were deliverable within the Order limits at all.</p> <p>Section 6.7 of the Statement of Need [APP-042] concludes that, when compared to onshore wind, the energy production from land under solar is of a similar order of magnitude while the environmental effects of solar schemes may be felt over a significantly smaller geography. Section 5.5 of ES Chapter 5: The Scheme [REP1-032] explains that, as a reasonable worst case, the Applicant has assumed that vegetation will be managed with machinery and there will be no grazing at the Solar PV Site during the operation and maintenance phase. However, should consent be granted, grazing by sheep will be explored, allowing the potential for agricultural use of land to continue between the panels.</p>
AM10	<p>Page 2</p> <p>8. Agricultural Land and Food Security The proposed development would remove a substantial area of land from food production for decades.</p> <p>At a time when food security is becoming increasingly important, there must be a clear justification for converting agricultural land into industrial energy infrastructure.</p>	<p>The Applicant has responded to the point on the loss of agricultural land and food security under the issue theme of 'Food Security' in Table 7.2 (page 304) of the Applicant's Response to Relevant Representations [REP1-067].</p>
AM11	<p>Page 2</p> <p>9. Soil Removal and Environmental Impact</p> <p>One of the most significant unanswered questions concerns the treatment of soil during construction.</p> <p>The Environmental Impact Assessment should clearly state:</p>	<p>As set out in ES Chapter 11: Soils and Agriculture [AS-018], topsoil excavation is limited to small areas such as for access tracks and will be stored on Site for subsequent use in restoration. For the larger areas such as the BESS and Customer and National Grid Substations, , soils will be stored on Site for restoration. The oSMP [REP1-062] states that the details relating to the location and management of stockpiled materials will be provided in the detailed Soil Management Plan. The oSMP [REP1-062] provides details of how stockpiled materials will be stored, handled, and maintained.</p>



Reference	Comments	Applicant's Response
	<p>How much topsoil and subsoil will be removed.</p> <p>The total carbon emissions associated with transporting this material.</p> <p>Where the soil will be taken.</p> <p>Whether it will be returned to the site in the future.</p> <p>How contamination risks will be managed if soil is removed, stored or replaced.</p> <p>If hundreds of thousands of tonnes of soil are moved, the associated emissions and environmental impacts should be fully accounted for in the project's carbon calculations.</p>	<p>As outlined in Table 11 of the oCEMP [APP/7.6.2], cut-off ditches or geotextile silt-fences are installed around stockpiles to prevent uncontrolled release of sediment and all potentially contaminated waters (for example washdown areas, stockpiles and other areas of risk for water contamination) to have separate drainage. The oSMP [REP1-062] was updated at Deadline 1 to confirm that stockpiles will be located outside pluvial flow pathways and Flood Zones 2 and 3. For each stockpile, a plan must be kept and maintained detailing: material type, date/time when stockpiled, volume of material, location, source location of material, and management of stockpile; this is all detailed in the oSMP [REP1-062].</p> <p>The oSMP [REP1-062] goes on to set out the procedures and mitigation measures to be followed for soil reinstatement during the decommissioning stage. The Applicant is required by Requirement 17 of Schedule 2 of the draft DCO [APP/3.1.2] to prepare a detailed Soil Management Plan which will need to consider weather, soil and land conditions, at the time of decommissioning, to ensure the Site is returned to its original use and condition as far as practicable, which will include consideration of its original topography. The oSMP [REP1-062] was updated at Deadline 1 to make this clear.</p> <p>ES Chapter 13: Climate Change [REP1-040] has undertaken a worst-case assessment which has assumed excavated material cannot be reused and will be removed from the Site during the construction phase. The environmental impact of this waste generation has been assessed in terms of its GHG contribution. However, with the commitments regarding re-use and stockpiling of soils detailed in this response, these environmental impacts will not be realised in practice.</p> <p>ES Chapter 9: Transport and Access [REP1-036] makes a worst-case assessment on the expected daily peak in construction vehicle activity, with the assumption that this would take place continually over the two year programme with the peaks in vehicles and HGVs overlapping. Across the programme the daily vehicle trips are likely to fall below this during periods of construction, so the vehicle activity during construction will be profiled accordingly by the contractor to account for any other Site activities that require additional vehicles to ensure that the daily trip threshold is not exceeded and the effects remain as assessed in the supporting environmental assessments. The cap on daily vehicle activity is secured through the oCTMP [REP1-052], which in turn is secured by way of Requirement 15 in the draft DCO [APP/3.1.2].</p>
AM12	<p>Page 2</p> <p>10. Ownership, Financial Accountability and Grid Connection Risk</p> <p>The proposed development is being promoted by Island Green Power, which is wholly owned by Macquarie Asset Management through its Green Investment funds.</p> <p>Given the scale of this project, local communities and decision-makers must have confidence that the developer has both the financial commitment and long-term responsibility required to manage the site throughout its operational life and eventual decommissioning.</p> <p>The ownership structure raises important questions regarding the following: Long-term stewardship of the site. Financial accountability over the project's lifetime.</p> <p>Decommissioning obligations at the end of the project's operational life. Whether ownership could be transferred to other investment entities in the future.</p> <p>Furthermore, planning permission should not be granted until a confirmed and binding Gate 2 grid connection agreement has been secured.</p>	<p>The Applicant is ultimately owned by three investment funds, which are managed by Macquarie Asset Management on behalf of a range of investors, including a number of UK pension funds. As noted in the Funding Statement [AS-005], Macquarie Group has invested in the UK's green-energy sector since 2005, and in total has arranged or invested more than £60 billion in UK infrastructure since 1999, including renewable energy projects. In 2022 Macquarie committed £12 billion of investment specifically for sustainable infrastructure across the UK, including solar generation and battery storage capacity. Worldwide, Macquarie is supporting over 90GW of green projects in development, 2GW in construction and 14GW in operations, and has invested or arranged £34 billion in funding specifically in green energy projects since 2010.</p> <p>The Applicant is fully aware of the scale of the Scheme and, taking the above into consideration, the Applicant can demonstrate both financial commitment and long-term responsibility to manage the Site across the construction, operation and decommissioning phases of the Scheme.</p> <p>In terms of decommissioning, a requirement to decommission the Scheme is set out in Requirement 20 of the draft DCO [APP/3.1.2]; failing to comply with that requirement would be a criminal offence. The requirement to decommission the Scheme would sit with the owner of the Scheme at the time of decommissioning. This could be the Applicant or a subsequent owner (and operator) of the Site at the time. The responsibility of adhering to the Requirements in the draft DCO [APP/3.1.2] is transferred to any new owner of the Scheme in accordance with the relevant provisions of the draft</p>



Reference	Comments	Applicant's Response
	<p>Approving a project of this scale before a firm grid connection date is established risks creating uncertainty for both local communities and the wider electricity network.</p> <p>A confirmed Gate 2 connection would provide greater certainty regarding:</p> <ul style="list-style-type: none"> - Project viability. - Construction timescales. - Network capacity availability. - The likelihood of the scheme being delivered as proposed. <p>Until a binding Gate 2 connection offer has been obtained and publicly disclosed, there remains a significant risk that the project may face substantial delays or require material changes to its delivery timetable.</p> <p>For these reasons, planning approval should be withheld until full Gate 2 connection status has been confirmed and independently verified.</p>	<p>DCO [APP/3.1.2] – there is no scenario in which a new owner takes control of the Scheme and does not have to comply with these Requirements.</p> <p>Decommissioning is also covered in the agreements with landowners, which include decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security will be regularly re-valued throughout the lifecycle of the Scheme and topped up if necessary. The Applicant has also submitted the oDS [REP1-058], and a detailed Decommissioning Strategy will be prepared and agreed with the relevant planning authority at that time of decommissioning, and will include detailed measures and timescales (in accordance with Requirement 20 of the draft DCO [APP/3.1.2]).</p> <p>In relation to the comments made regarding Gate 2 connection, the Applicant refers to its response in row AM8 above. The Applicant has also addressed this point in further detail in response to NGET8 of this document.</p>
AM13	<p>Page 2</p> <p>11. Precautionary Principle and Planning Prematurity</p> <p>The Drovers Solar Farm proposal appears to rely upon a number of assumptions regarding future grid availability, future battery technologies, future electricity demand and future project economics.</p> <p>Where significant uncertainties remain, the precautionary principle should apply.</p> <p>The planning authority should not be expected to approve a project of this scale on the basis that key issues may be resolved at a later date.</p> <p>Instead, applicants should demonstrate that all critical infrastructure, environmental impacts and operational requirements have been fully assessed before consent is granted.</p> <p>In particular, the following matters should be resolved prior to any planning approval:</p> <ul style="list-style-type: none"> - Confirmation of a binding Gate 2 grid connection agreement. - Full disclosure of the project's carbon payback calculations. - Detailed battery replacement and recycling plans. - Comprehensive soil management and restoration plans. - Evidence demonstrating why alternative technologies or lower-impact sites have been discounted. 	<p>At the outset, the Applicant wishes to note that it does not consider that it has adopted any more assumptions in the DCO Application than are standard practice for applications commonly made for solar DCOs, including those which have been consented by the Secretary of State. Nonetheless, the Applicant addresses the points made in turn.</p> <p><u>Precautionary Approach</u></p> <p>The Applicant has, as is standard practice for solar DCO applications, adopted the Rochdale Envelope approach for the design and layout of the Scheme – this is in order to maintain flexibility, address uncertainties in the Scheme design and allow for advancements in technology from the time of application to the time of construction. As set out in ES Chapter 5: The Scheme [REP1-032], this approach involves specifying parameter ranges and allows for a project to be assessed on the basis of maximum parameters (which have been considered in detail by technical authors in the ES), i.e. to ensure the realistic worst-case effects of the Scheme have been assessed for each potential receptor. Planning Inspectorate Advice Note 9 (2018) sets out advice on the use of the Rochdale Envelope as a way of assessing a proposed development comprising EIA development where uncertainty exists with the final design details and necessary flexibility is sought. The Applicant therefore considers that it has applied sufficient precaution in the DCO Application for, and assessment of, the Scheme as a whole.</p> <p>The Applicant is therefore confident that the Examining Authority and the Secretary of State (the latter being the decision-maker for the Scheme, rather than the local planning authority) have sufficient information in front of them to examine, recommend and determine the Scheme. All critical infrastructure, environmental impacts and operational requirements have been fully assessed by the Applicant.</p> <p><u>Grid Connection Agreement</u></p> <p>The Applicant refers to its response to CAPC2-21, AM1 and AM8 on this matter. The Applicant has also addressed this point in further detail in response to NGET8 of Table 3 of this document.</p> <p><u>Carbon Payback</u></p> <p>ES Chapter 13: Climate Change [REP1-040] assesses GHG emissions across the full life cycle of the Scheme, including the embodied carbon associated with materials and components, transport of materials, installation, operation, maintenance and decommissioning of Scheme. This assessment includes the Scheme emissions considering a reasonable worst-case scenario, as well as operation phase emissions savings arising from renewable electricity generation. The</p>



Reference	Comments	Applicant's Response
		<p>assessment concludes that, while there are GHG emissions associated with the construction, operation, maintenance and decommissioning of the Scheme, these are outweighed over time by the carbon savings achieved by the Scheme's contribution towards the grid decarbonisation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to Net Zero.</p> <p><u>Battery Replacement and Recycling</u></p> <p>The oBSMP [APP-194] has been submitted as part of the DCO Application, and is secured via Requirement 6 of the draft DCO [APP/3.1.2], to set out the mitigation measures in relation to the BESS units (including with regard to replacement and recycling).</p> <p>End-of life or damaged BESS units are to be electrically disconnected from the system when identified as being required. When disconnecting damaged or defective units, a specific risk assessment shall be conducted prior to the removal of the defective module to ensure the safety of employees and contractors. Damaged or defective units will be inspected and placed in an approved protective container prior to being transported from Site, to ensure against any risk of contaminants entering ground or surface water. End-of-life batteries awaiting regular replacement will be stored in situ. This is considered most appropriate due to existing contamination bunding and surface-water runoff protections associated with the BESS enclosure. Batteries that are removed from the BESS are not stored at the Site; they are returned to the battery manufacturer for repair/ refurbishment.</p> <p>Under current UK legislation, end-of-life BESS infrastructure is controlled under The Waste Batteries and Accumulators Regulations 2009. These regulations require battery producers to receive, sort, and suitably handle batteries and deliver to an approved battery treatment operator for treatment and recycling.</p> <p>Finally, the oDS [REP1-058] (which is secured via Requirement 20 of the draft DCO [APP/3.1.2]) provides for decommissioned infrastructure to be managed in accordance with the applicable legislation relating to waste and recycling that is in force at that time.</p> <p><u>Soil Management and Restoration Plans</u></p> <p>The oSMP [REP1-062] has been submitted as part of the DCO Application, and is secured via Requirement 17 of the draft DCO [APP/3.1.2], to provide the framework for detailed soil management methods to be implemented during the construction, operation and maintenance, and decommissioning phases, ensuring that soil structure, quality and function are protected and restored.</p> <p>The detailed soil management plan will, per paragraph 2.5 of the oSMP [REP1-062], include soil management methodologies such as "<i>restoration methods for land that is disturbed temporarily during construction and subsequently returned to agricultural use for the operation of the Scheme</i>" and also details that the "<i>detailed SMP will also describe where and for how long these soils would be stockpiled; how soil within the stockpiles would be managed, having regard to different soil types and neighbouring land uses; and how and when any of the soils would be restored</i>" (per paragraph 4.2).</p> <p>The oSMP [REP1-062] also confirms that no agricultural land will be destroyed as a result of the Scheme. Further, section 11.8 of ES Chapter 11: Soils and Agriculture [AS-018] sets out that by following the measures within the oSMP [REP1-062], soils will not be permanently affected.</p> <p>Lastly, the Applicant notes that the amount of land by ALC grade that is affected by temporary or permanent disturbance is summarised in Table 11-7 of ES Chapter 11: Soils and Agriculture [AS-018] and amounts to 38ha of BMV. The majority of this, except for 4.5ha for the National Grid Substation and Grid Connection Infrastructure, will be restored to comparable grade on</p>



Reference	Comments	Applicant's Response
		<p>decommissioning. Mitigation planting will add a further 4.3ha of BMV land to the total, as a land use change.</p> <p><u>Alternatives</u></p> <p>The Applicant provided a comprehensive summary of its consideration of alternative sites and technologies during Issue Specific Hearing 1. Rather than repeat its submissions on this matter, the Applicant refers to Agenda Item 3.1 within the Written Summary of Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071].</p>
AM14	<p>Pages 2 and 3</p> <p>12. Soil Microbiology and Soil Restoration Concerns</p> <p>Soil is not simply an inert material that can be removed, stored, transported and replaced without consequence. Healthy agricultural soil contains complex biological communities of bacteria, fungi, earthworms and other microorganisms that are essential for soil fertility, nutrient cycling, water retention and crop productivity. If significant quantities of topsoil and subsoil are excavated, stockpiled, transported or replaced, there is a risk that these biological systems may be disrupted or damaged.</p> <p>Concerns include:</p> <ul style="list-style-type: none"> - Loss of beneficial soil microorganisms during excavation, storage and transportation. - Damage to soil structure through compaction by heavy construction machinery. - Reduction in soil fertility and agricultural productivity following reinstatement. - Changes in soil chemistry and nutrient balance. - Increased risk of invasive species, weeds or pathogens being introduced through imported soils or soil mixing. - Potential impacts on drainage, water infiltration and soil carbon storage. <p>The applicant should therefore provide detailed evidence demonstrating: Whether baseline surveys of soil biological health have been undertaken. How soil microbial communities will be protected during construction. What measures will be used to prevent soil compaction. Whether independent monitoring of soil health will be carried out during construction, operation and decommissioning. How the site will be restored to its original agricultural capability at the end of the project's life.</p> <p>Simply replacing soil after construction does not necessarily restore the complex biological ecosystem that may have taken decades or centuries to develop. The applicant should therefore demonstrate that any impacts on soil health, biodiversity and agricultural productivity can be fully mitigated and reversed.</p>	<p>The concerns are noted in respect of soil excavation, stockpiling and replacement. The need for soils to be stripped, moved and stockpiled is limited to specific parts of the Site . The insertion of the ground-mounted PV arrays is described in ES Chapter 11: Soils and Agriculture [AS-018] at paragraphs 11.8.21 to 11.8.32, and does not require soil to be stripped or moved. Temporary stripping for the construction compounds is assessed at paragraphs 11.8.8 to 11.8.14. Soil movement for access tracks (which involves moving 0.9 cubic metres per metre run) is described in ES Chapter 11: Soils and Agriculture [AS-018] at paragraphs 11.8.15 to 11.8.20.</p> <p>Long term soil movement, which may include subsoil, for the Customer Substation, National Grid Substation and BESS, is described in ES Chapter 11: Soils and Agriculture [AS-018] at paragraphs 11.8.35 to 11.8.42. Topsoil and subsoil will be stored in suitable conditions on Site and, with the exception of the National Grid Substation, these areas will be restored to like ALC grades at decommissioning.</p> <p>Long-term soil stored in suitably-designed and managed bunds will retain aerobic conditions and microbial communities will remain active in the soil. The oSMP [REP1-062] provides guidance on the building and maintenance of stockpiles, including measures to ensure the quality of the soil for re-use; this document provides the outline framework for the future detailed Soil Management Plan, to be secured via requirement of the DCO. Across the Scheme the amount of land where soil is disturbed is set out in Table 11-7 and described in paragraphs 11.8.51 to 11.8.54 of ES Chapter 11: Soils and Agriculture [AS-018], with soil effects described in paragraphs 11.8.55 to 11.8.60.</p>



Reference	Comments	Applicant's Response
AM15	<p>Page 3</p> <p>13. Impact on Landscape Character and Historic Environment</p> <p>The proposed solar panels, reaching heights of approximately 4 metres, together with security fencing, CCTV infrastructure, access tracks, inverter stations and Battery Energy Storage Systems (BESS), would introduce substantial industrial development into what is currently a predominantly rural landscape. Particular concern should be given to the effect of the development on the character, appearance and setting of nearby historic and heritage assets.</p> <p>Even where a designated heritage asset is not physically affected, national planning policy recognises that harm can occur through impacts on its setting and surrounding landscape.</p> <p>Questions requiring further assessment include:</p> <p>What impact will 4-metre-high solar arrays have on important views and landscape character?</p> <p>How will the development affect the setting of nearby listed buildings, conservation areas, archaeological sites and historic landscapes?</p> <p>Will existing public rights of way experience a significant change in visual amenity?</p> <p>How effective will proposed screening measures be throughout the year, particularly during winter months when vegetation cover is reduced?</p> <p>What cumulative impact will this development have when considered alongside existing and proposed energy infrastructure in the wider area?</p> <p>The applicant should provide clear visualisations from representative viewpoints demonstrating the appearance of the development during all seasons and from locations where historic assets are experienced by the public.</p> <p>The planning authority must carefully consider whether the industrialisation of a rural landscape for several decades would cause unacceptable harm to local character, visual amenity and the setting of heritage assets.</p>	<p>The contribution of setting to the significance of designated heritage assets is detailed within ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] and impacts of the proposed development are presented within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets due to the lack of shared experience between the plateau land and the heritage assets, which is a prerequisite for contribution to significance. Large tracts of agricultural land lie between the Order limits and the assets and the understanding and context of these assets will, therefore, remain to be clearly appreciated.</p> <p>The potential adverse landscape effects are detailed within ES Chapter 6: Landscape and Visual [AS-016]. The assessment includes visual receptors at Castle Acre Castle and Castle Acre Priory, to the north of the Site. The assessment considers all elements of the Scheme, including the Solar PV Arrays, which in the long term would be predominantly screened by the proposed landscape mitigation planting outlined within the oLEMP [REP1-060]. The maximum height parameter for the Solar PV Array area is 4.5m to account for tracker panels. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. This assessment takes account of the worst-case scenario, which considers potential visual effects during winter months when existing and new deciduous vegetation have lost leaf foliage.</p> <p>ES Chapter 6: Landscape and Visual [AS-016] outlines the approach and details that cumulative effects may arise as a result of effects associated with the Scheme combining with effects associated with other developments. The Scheme has been assessed strategically in the context of existing (as part of the baseline context) and proposed solar and energy infrastructure schemes, including NSIP scale projects Norfolk wide. Only one development, High Grove Solar, has the potential to result in significant cumulative effects on Landscape and Visual within the associated LVIA Study Area. Section 6.11 undertook a Cumulative Effects Assessment which included High Grove Solar Farm which concluded that there would be:</p> <ul style="list-style-type: none"> - significant adverse visual effects during construction for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave; and - significant adverse landscape effects during construction and operation on the E6 North Pickenham Plateau LCA. <p>Visualisations of the Scheme, both parameter based and the illustrative design, from a number of assessed viewpoints within the wider study area are included within ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires (Part A) [AS-023 to AS-029], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031 to AS-037], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039 to AS-043] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045 to AS-049]. These are visualised during both summer and winter months.</p>
AM16	<p>Page 3</p> <p>14. Impact on Public Access, Wellbeing and Wildlife Movement</p> <p>The proposed development would transform a large area of open agricultural landscape into a network of fenced compounds, security infrastructure and restricted-access corridors.</p>	<p>Potential visual impacts as a result of the Scheme, upon PRoW including the various droves, are detailed within ES Chapter 6: Landscape and Visual [AS-016] and ES Appendix 6.8: Amenity and Recreation Assessment [APP-146].</p> <p>The potential adverse landscape effects are detailed within ES Chapter 6: Landscape and Visual [AS-016]. The assessment includes visual receptors such as walkers, cyclists and other users of the PRoW, within the Site and wider LVIA study area. The assessment considers all elements of the Scheme, including security fencing, which in the long term would be predominantly screened by</p>



Reference	Comments	Applicant's Response
	<p>For local residents, walkers, cyclists and other users of public rights of way, this represents a significant change in how the landscape is experienced.</p> <p>Many existing routes currently pass through open countryside with expansive views and a strong sense of space. The introduction of extensive fencing and solar infrastructure may create the perception of being channelled through enclosed corridors surrounded by industrial development.</p> <p>Concerns include:</p> <p>Loss of openness and rural character along public rights of way.</p> <p>Reduced enjoyment of recreational routes used by local residents and visitors.</p> <p>Potential impacts on mental wellbeing associated with the loss of accessible open countryside.</p> <p>Visual intrusion from fencing, solar arrays, substations and associated infrastructure.</p> <p>The cumulative effect of multiple fenced areas across the landscape.</p> <p>There are also concerns regarding wildlife movement.</p> <p>While mitigation measures may be proposed, extensive fencing has the potential to alter natural movement patterns and fragment habitats that have historically existed within an open agricultural landscape.</p> <p>The applicant should therefore provide evidence demonstrating:</p> <p>How public access and recreational enjoyment will be maintained throughout the lifetime of the project.</p> <p>Whether the development will result in a significant change in the experience of users of public rights of way.</p> <p>How wildlife corridors will be protected and maintained.</p> <p>What measures will be implemented to prevent habitat fragmentation?</p> <p>How the effectiveness of these measures will be monitored over the operational life of the site.</p> <p>The planning authority should carefully consider whether the cumulative effect of extensive fencing, restricted areas and associated infrastructure would fundamentally alter the character of the landscape and the way it is used by both people and wildlife.</p>	<p>the proposed landscape mitigation planting outlined within the oLEMP [REP1-060]. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits.</p> <p>Visual openness and rural character is considered as part of the landscape character baseline within the LVIA. The LVIA acknowledges that there would be potentially adverse visual effects as a result of the Scheme, for visual receptors within the Site and study area, but the effect would not be significant in EIA terms.</p> <p>The potentially adverse effects identified within ES Chapter 6: Landscape and Visual [AS-016] take account of various mitigation measures embedded within the Scheme, which were designed to limit potentially adverse effects upon the landscape and visual amenity. These mitigation measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.2], the spatial extents shown on the Works Plan [APP-009], the oOEMP [APP/7.8.2] and the oLEMP [REP1-060]. This design approach is embedded within the Applicant's Global Design Principle 2 and more specifically Project Principles 2.5 "<i>respect setting of heritage assets along the Nar Valley</i>", 2.8 "<i>consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane</i>" and 2.9 "<i>consider experience of people using the PRow</i>".</p> <p>Mitigation measures have included the retention of existing natural features, extensive new planting and setbacks from receptors and the Order limits to ensure the Scheme responds to its local context. Other mitigation measures include:</p> <ul style="list-style-type: none"> Retention of the majority of existing landscape features within and around the boundaries of the Site, namely mature hedgerows and tree cover which contribute to the landscape character of the local context. These landscape features serve to restrict, filter and enclose visibility within the Site and study area south of Bartholomew's Hills Plantation. There is some loss of vegetation proposed as part of the Scheme to allow for the Grid Connection Infrastructure, Site and internal field access Offset and buffering of the Scheme with new, woodland, hedgerow and tree planting to mitigate potential views from the nearby PRow, roads and residential dwellings both within and in close proximity to the Site In addition to the establishment of new hedgerow and hedgerow trees, the embedded mitigation also includes the retention, gapping up and enhancement of existing hedgerow within the Site. New planting species would be native, locally prevalent and include a mixture of deciduous and evergreen species to provide year-round screening. Alongside the existing hedgerow and trees within the Site's context, the gapping up of hedgerow with native trees and whips would provide visual screening of the Scheme from visual receptors within the wider study area, and from PRow and droves within the Site itself The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term, as secured and detailed within the oLEMP [REP1-060]. The prescribed maintenance height of hedgerow at 3m is an embedded mitigation measure which aims to screen views towards taller elements of the Scheme from nearby PRow. The active management and maintenance of trees and woodland within the Order limits, both newly planted and existing, aims to ensure they not only survive but reach maturity and establishment in the medium and long term durations. In turn, these landscape features are



Reference	Comments	Applicant's Response
		<p>primary mechanisms for filtering and screening views towards the Scheme from nearby PRow, roads and residential dwellings</p> <ul style="list-style-type: none"> • Setting back the Scheme from key landscape features within and adjacent to the Site, such as droves, trees, hedgerow and woodland. The minimum offsets/buffers from existing landscape features, are outlined fully in ES Chapter 5: The Scheme [REP1-032]. The Scheme would be offset from existing PRow by a minimum of 15m, to respect the amenity and experience for PRow users along existing routes and allow for the sowing of extensive areas of new grassland along the margins of the Scheme. New grassland/wildflower areas are also proposed to be sown underneath the Solar PV Arrays which would enhance biodiversity within the Site; and • As referred to within the oLEMP [REP1-060], recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western Site area, that is connected to the existing PRow network. In addition to this, a number of new permissive routes are proposed, of approximately 3.5km in total, which would link to the existing PRow network within the study area to provide recreational benefits. • In regard to concerns relating to wildlife movement, it is noted that the operational area of the Scheme will be enclosed within perimeter fencing; however, dispersal impacts on wildlife are not anticipated, due to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation, as detailed within Section 7.7 of ES Chapter 7: Ecology and Biodiversity [REP1-034] and secured within Design Principles, Parameters and Commitments [APP/5.8.2]. <p>With regard to potential cumulative effects, ES Chapter 6: Landscape and Visual [AS-016] outlines the approach and details that cumulative effects may arise as a result of effects associated with the Scheme combining with effects associated with other developments. The Scheme has been assessed strategically in the context of existing (as part of the baseline context) and proposed solar and energy infrastructure schemes, including NSIP scale projects Norfolk wide. Only one development, High Grove Solar, has the potential to result in significant cumulative effects on Landscape and Visual within the associated LVIA Study Area. Section 6.11 undertook a Cumulative Effects Assessment which included High Grove Solar Farm which concluded that there would be:</p> <ul style="list-style-type: none"> - significant adverse visual effects during construction for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave; and - significant adverse landscape effects during construction and operation on the E6 North Pickenham Plateau LCA.
AM17	<p>Page 4</p> <p>15. Effectiveness of Proposed Wildlife Corridors</p> <p>The applicant may propose wildlife corridors and gaps within fencing as mitigation measures to maintain animal movement across the site. However, the effectiveness of these measures requires careful scrutiny.</p> <p>A key concern is whether these corridors genuinely connect suitable habitats or simply direct wildlife towards surrounding roads and other hazards. If wildlife movement routes ultimately lead towards busy roads, the proposed mitigation could have unintended consequences, including:</p> <p>Increased risk of road traffic collisions involving wildlife.</p>	<p>Impacts on mammal species in relation to nature conservation and biodiversity are considered within ES Chapter 7: Ecology and Biodiversity [REP1-034], which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant (in EIA terms) effects.</p> <p>Woodland habitats likely providing the focus of existing deer use will remain outside of the protection fencing, with wide corridors in particular along the droves which will provide continued routes through the Site for deer, as secured by Design Principles, Parameters and Commitments [APP/5.8.2]. These routes will therefore remain largely unchanged from the existing position.</p> <p>Section 7.5 of the oLEMP [REP1-060] details the outline ecological monitoring strategy. The outline ecological monitoring strategy includes the details of the habitat, botanical, soil, and bird monitoring proposed during the operational phase of the Scheme. It also acknowledged that additional survey</p>



Reference	Comments	Applicant's Response
	<p>Disruption of established movement patterns and foraging routes.</p> <p>Fragmentation of habitats that are currently connected across open farmland.</p> <p>Increased stress and energy expenditure for animals attempting to navigate fenced infrastructure.</p> <p>Reduced effectiveness of ecological mitigation measures over time.</p> <p>The applicant should therefore provide evidence demonstrating:</p> <ul style="list-style-type: none"> - Where wildlife using the proposed corridors is expected to travel beyond the site boundary. - Whether those routes connect to suitable habitats or ecological networks. - The proximity of wildlife corridors to major roads and traffic routes. - Any assessment of increased wildlife mortality associated with nearby roads. - How the long-term effectiveness of the corridors will be monitored and managed. It should not be assumed that a corridor automatically delivers a biodiversity benefit simply because it exists. The quality, connectivity and destination of those corridors are equally important considerations. <p>The planning authority should therefore require robust evidence that the proposed wildlife corridors provide genuine ecological connectivity rather than merely displacing wildlife towards less suitable or more hazardous environments.</p> <p>Until these matters are satisfactorily addressed, granting planning permission would be premature and could expose both local communities and the planning authority to significant long-term risks and uncertainties.</p> <p>For the reasons set out above, I respectfully request that the planning authority either refuse the application or defer any decision until the applicant has provided satisfactory evidence addressing the concerns identified in this submission. The burden of proof should rest with the developer to demonstrate that the environmental, agricultural, ecological, heritage and infrastructure impacts can be adequately mitigated throughout the lifetime of the project and upon decommissioning.</p>	<p>elements may be included in the detailed monitoring strategy including bat surveys and opportunities to link up with organisations such as Norfolk Wildlife Trust to carry out further monitoring.</p> <p>The Applicant also notes that the DCO Application will be examined by the Examining Authority (as appointed by the Secretary of State) who will, upon the close of the Examination, produce a recommendation report for the relevant Secretary of State who is to determine the Scheme. The local planning authority (being the host authorities) are not the decision takers in this process.</p>
AM18	<p>Page 4</p> <p>Questions Requiring Answers</p> <p>Why have the carbon emissions associated with the removal, transportation and storage of large quantities of soil not been fully included in the project's carbon assessment?</p> <p>Exactly how much topsoil and subsoil will be removed from the site?</p> <p>Where will this material be transported and stored?</p> <p>How much of the original soil will be returned after decommissioning?</p>	<p>ES Chapter 13: Climate Change [REP1-040] considers the emissions associated with the removal of soil within the waste section (paragraph 13.9.46). A detailed assessment of land-based carbon fluxes and sequestration is beyond the scope of ES Chapter 13: Climate Change [REP1-040] and is not required to determine the significance of the Scheme's climate effects. Notwithstanding this, the proposed change in land use from predominantly arable agriculture to low-input grassland beneath and between the solar arrays has the potential to provide an additional carbon sequestration benefit. Based on published sequestration rates referenced by Natural England ('Carbon storage and sequestration by habitat: a review of the evidence' 2nd edition, 2021; NERR094), low-input grassland can generate a sequestration flux of approximately 1.590 tCO₂e/ha/year, with additional net benefits where there is currently livestock being farmed. Consequently, the reported greenhouse gas balance in the ES is likely to underestimate rather than overestimate the overall climate benefit of the Scheme.</p>



Reference	Comments	Applicant's Response
	<p>What measures will be taken to prevent soil contamination, degradation or loss of fertility?</p> <p>What is the expected grid connection date and what guarantees exist that the project will be connected within the stated timescale?</p> <p>What assessment has been undertaken comparing this proposal with alternative low-carbon technologies such as wind power or small modular reactors?</p> <p>These questions should be answered transparently before any decision is made on the future of the Drovers Solar Farm project.</p>	<p>In relation to matters regarding the removal, transportation, storing and reinstatement of soil, the Applicant refers to its response to AM11 above.</p> <p>The Applicant has responded to the point on soil contamination, degradation or loss of fertility at reference NE14 of the Applicant's Response to Relevant Representations [REP1-067].</p> <p>As set out in ES Chapter 5: The Scheme [REP1-032], the Scheme is anticipated to energise in Q4 2033, or as early as NESO are able to offer. Whilst there are no guarantees of connecting in Q4 2033, the date of connection in the agreement with NESO falls within this period. The Applicant has responded to matters regarding the consideration of alternatives within Table 7.3 of Applicant's Response to Relevant Representations [REP1-067], which makes reference to Section 2.9 of the Statement of Need [APP-042] that describes the Government's clean power capacity ranges. These ranges demonstrate that an unprecedented new capacity of all low carbon generation technologies is urgently required to achieve the Government's aim to deliver a clean power system by 2030 and keep it clean thereafter. Therefore, the potential for new capacities of other technologies in this or other locations cannot be considered as alternative approaches to deliver carbon reductions, because any such capacities are likely also to be needed. The Applicant is a solar developer, and the Scheme is a large-scale solar scheme.</p>



THE DROVES
SOLAR FARM