

Comments for Deadline 2 – Applicant’s response to ExQ1

Sporle with Palgrave Parish Council represented by [REDACTED] RIN – [REDACTED]

Sporle with Palgrave Parish Council (PC) wish to make a number of comments with respect to the following Applicant’s response to ExQ1

<i>ExQ</i>	<i>Applicant’s Response</i>	<i>PC comment</i>
Q1.0.1	<p>The Applicant has updated and submitted ES Figure 2.1: Cumulative Schemes [APP/6.3.1] at Deadline 1 to annotate clearly each scheme from the short list (to include High Grove Solar Farm) and provide details of any interaction or overlaps. The only overlap between the Order limits for the Scheme and other developments is with High Grove Solar Farm.</p>	<p>Figure 2.1 appears not to show the proposed Shipdham solar and BESS project nor the Jafa project near Little and Great Dunham. Both are in the process of or have gained consent from BDC.</p>
Q2.0.2	<p><i>Cumulative effects for aviation receptors</i> Currently, limited information is publicly available regarding the panel configurations for High Grove Solar Farm. It is understood that the Preliminary Environmental Information Report for High Grove Solar considered options for both fixed south facing and single axis tracking panels for that project.</p> <p>The only panel areas of High Grove Solar Farm which could produce cumulative effects for aviation receptors would be the central panel areas, which are directly adjacent to the Scheme and border High Grove Solar Farm to the south and east. The south-eastern section of the Site which borders High Grove Solar Farm is not predicted to be visible to the ATC tower, and there are therefore no cumulative effects predicted upon the ATC tower. Cumulative effects could be possible towards the approach paths and visual circuits at RAF Marham, but this would require the Scheme and High Grove Solar Farm to share the same panel technology. Indicative modelling has been conducted for this scenario, which indicates that any glare would be within the same intensity classification, and therefore impacts are not considered to be of a greater severity due to cumulative effects.</p>	<p>This highlights the importance that PC representations have put on the need for speedy action during this examination to engage with High Grove to deal with the cumulative impacts caused by the increasing likelihood of construction taking place at the same time of both the Drovers and High Grove.</p>
Q10.0.7	<p><i>Alternative agricultural use during the operational phase</i> Sheep grazing under and around solar PV arrays is common practice. It is often difficult to identify, however, and so is not easily seen when passing solar farms.</p> <p>The Department for the Environment, Food and Rural Affairs dataset “Agricultural Land Use in the UK at 1</p>	<p>The PC would comment that the difficulty with sheep grazing under solar is the difficulty of rounding sheep up using dogs due to the poor visibility around the panels.</p> <p>Sheep grazing under solar arrays is highly promoted by solar developers to alleviate</p>

	<p>June 2025”, published 17 December 2025, identifies that at 1 June 2025 land used for solar farms also used for grazing or agricultural production covered 4,937 ha, and land used for solar panels not used for agricultural production covered 4,563 ha. This excludes larger-scale solar farms as they are not collected within the Defra survey of farms. Statistically, over half of solar farm areas (52%) on working farms were being grazed at 1 June 2025.</p> <p>For sheep to be grazed, there will be a requirement for water to be provided, for animal welfare reasons, but this can be provided by the use of alkathene pipes or by bowser. Water supplies are already in existence across the Site, which is used for grazing sheep and rearing pigs in places. Temporary collecting pens will also be needed, but these are moveable facilities. Both are part of normal farming activity and would not need to be secured specifically within the DCO.</p>	<p>the concerns over loss of agricultural land but the figures stated by the Applicant show that it is not by any means possible for all solar projects. Other agricultural production is not possible with the current design.</p>
<p>Q10.0.10</p>	<p><i>Cumulative effects during decommissioning phase</i> At the time of the production of the ES Chapter 11: Soils and Agriculture [AS-018] in January 2026, the assessment of cumulative effects on agricultural land quality was hindered by a lack of information about land quality. The available data was set out in Table 11-10.</p> <p>Since the publication of the ES, details of ALC for EN0110010 High Grove Solar and EN0110014 East Pye Solar have been published and can now be assessed.</p> <p>In addition, a new Predictive Agricultural Land Classification Map for England has been published, including predictive breakdowns by Subgrade of Grades 3a and 3b. Across Norfolk a significant proportion of land has been upgraded from the provisional ALC maps from the 1970s.</p> <p>The Applicant’s Update Note on Published Information and Cumulative Assessment on Agricultural Land Quality [APP/8.9] has been prepared and submitted by the Applicant at Deadline 1. This provides known ALC data, or the new predictive ALC grade, for the long and short list of sites in the cumulative assessment, and concludes that the conclusions of the ES are unchanged</p>	<p>This highlights the importance that PC representations have put on the need for speedy action during this examination to engage with High Grove to deal with the cumulative impacts.</p>
<p>Q11.0.2</p>	<p><i>Advance planting and associated temporary hoarding</i> The following responses are given directly towards each section of the Written Question, as outlined below: i) Yes, the advance planting has been completed and was planted during the winter of 2025/26. The advance planting plan is included within the oLEMP [APP/7.11.1].</p>	<p>The PC can confirm the advance planting that has been done by the landowner along A1065 and at other sites but the site visit made with the Applicant’s landscape architect on June 1st revealed a significant</p>

	<p>ii) The temporary hoarding would need to be in place until the vegetation along the A1065 has reached a height of 3m. It is estimated that new advance planting would have reached this height by year 1 of the Operation Phase, Q4 2033.</p> <p>iii) The appearance of the temporary hoarding would be determined and agreed with the LPA during the detailed design stage, such as through a detailed CEMP, should the DCO gain consent.</p> <p>iv) Figure 5.2: Construction Masterplan [APP/6.3.1] shows the extent of the temporary hoarding, so no update is required.</p>	<p>amount of planting had appeared to have died. Presumably these will be replaced?</p> <p>It is noted that the latest version of the oLEMP includes for a watering and management regime for 2 years. This management regime should include a replacement policy. The PC would ask if this regime is long enough?</p>
<p>Q12.0.2</p>	<p><i>Statement of Need, Overplanting</i></p> <p>The Applicant can confirm that for the purposes of assessing the impacts of the Scheme it has assumed an overplanting ratio of approximately 1.25 (i.e. a c.650MWp (DC) scheme). As per the Applicant's response to Q12.0.1(i) above, and as explained at paragraph 13.9.13 of ES Chapter 13: Climate Change [APP/6.2.2], a conservative approach assuming the Single Axis Trackers has been included for the purpose of the GHG assessment.</p> <p>Together these assumptions ensure that the overall assessment of the planning balance has been carried out on a worst-case basis.</p>	<p>The PC asks how has this overplanting been achieved in the design? Is it achieved by additional solar arrays or the likely increased efficiency of the panels at the time of build and when the subsequent panel replacement is done? If it has been designed with the former, would it be possible to still achieve overplanting allowing for the increased panel efficiency and therefore being able to reduce the land take?</p>
<p>Q13.0.2</p>	<p><i>High Grove Solar Farm additional mitigation</i></p> <p>High Grove Solar Farm development is currently in 'pre-application stage' as such, limited information regarding noise and mitigation is available. The cumulative effects were therefore presented based on the preliminary information available for High Grove Solar Farm from their Chapter 11: Noise and Vibration of their Preliminary Environmental Information Report (PEIR).</p> <p>i) Additional mitigation has not been detailed in High Grove Solar Farm's noise and vibration assessment; however, their PEIR Chapter 11 states in Section 11.9 'The Applicant has committed to revise the design of the Proposed Development to relocate electrical infrastructure away from the ESRs predicted to experience significant effects and maintain the offsets from the non-significant ESRs, This would therefore result in a Not Significant effect. The revised layout will be assessed at ES stage.' The design of their development is expected to be revised, including additional mitigation where necessary to achieve non-significant effects, which should also include cumulative effects with the Scheme. As the additional mitigation relates to High Grove Solar Farm, it cannot be secured as part of this Scheme.</p>	<p>This highlights the importance that PC representations have put on the need for speedy action during this examination to engage with High Grove to deal with the cumulative impacts.</p>

	<p>ii) As per the response above, the High Grove Solar Farm development layout and details are to be revised and as such, without the High Grove Solar Farm's final design or layout the Applicant can only provide indicative cumulative effects based on their PEIR. Given the respective stages of applications, the onus lies with High Grove Solar Farm (currently in pre-application stage) to undertake an updated cumulative noise assessment and outline additional mitigation where necessary to achieve non-significant effects cumulatively including the Scheme. It is, however, noted that the Applicant is committing to collaboration with the undertakers of the High Grove Solar Farm during the detailed design stage of the Scheme, to seek to achieve cumulative noise levels that do not exceed 35dB(A) at 'The Off Barn' receptor during the operational phase (as secured in paragraph 2.5.4 of the oCEMP [APP/7.6.1])</p>	
Q14.0.4	<p><i>Proposed new permissive routes</i> The Applicant is collaborating with High Grove Solar Farm to facilitate the delivery of improved recreation connectivity between Swaffham and the Nar Valley, as described within paragraphs 8.312 – 8.3.13 of the Design Approach Document [AS-009 to AS-011]. The 1.2km of offsite paths would be delivered through collaboration with the High Grove Solar Farm, if it were to be consented, and are not secured within the Scheme. If High Grove Solar Farm is not consented, the Applicant has included approximately 3.5km of permissive paths within the Order limits, which connect through to West Acre Road which improve recreation connectivity between Swaffham and the Nar Valley.</p>	<p>This highlights the importance that PC representations have put on the need for speedy action during this examination to engage with High Grove to deal with the cumulative impacts.</p>
Q14.0.5	<p><i>Cumulative effects</i> The Applicant can confirm that the following assumptions have been made regarding the construction phases for East Pye Solar and High Grove Solar Farm:</p> <ul style="list-style-type: none"> - Each project is anticipated to have a 24-month construction period. - Each project has been assumed to energise in line with their grid connection dates, in 2031. By this point, all construction activities would have finished. - The earliest the Construction Phase for the Scheme would commence would be Q3 2031. - There would not be a substantial overlap in peak construction activities across the schemes. 	<p>The PC contends that this response is unsustainable in light of the problems that the Drovers, High Grove and also the Shipdham projects are having in negotiating substation sites with NGET and connection through NESO.</p> <p>The PC contends that it is likely that there is now a high probability that all the projects mentioned will have a substantial overlap in construction and that these assumptions, on which the construction phase is based, be changed to reflect this.</p> <p>This again highlights the importance that PC representations have put on the need for speedy action during this examination to</p>

		engage with High Grove to deal with the cumulative impacts caused by the increasing likelihood of construction taking place at the same time of both the Drovers and High Grove.
Q14.0.6	<p><i>Effects on The Peddars Way and the Nar Valley Way</i></p> <p>The Applicant notes the Examining Authority has highlighted a point of concern from CAPC's Relevant Representation. The Applicant has addressed CAPC's concern in full in the Applicant's Response to Relevant Representations [APP/8.4], including this point at CAPC20 of that document.</p>	<p>CAPC20 of Applicant's Response to Relevant Representations states: <i>'There are no potential long term significant adverse landscape effects beyond the Order limits.'</i></p> <p>The PC continues to contend that there are significant adverse landscape effects beyond the Order limits. This is made more significant and adverse by the cumulative impact of the High Groves development.</p> <p>These are experienced along the Peddars Way and this is why it is important that the ASI does visit VP46 as shown in the PC response to ExQ1 (REP1-097).</p> <p>This again highlights the importance that PC representations have put on the need for speedy action during this examination to engage with the bordering High Grove scheme.</p>
Q14.0.13	<p><i>Outline Battery Safety Management Plan</i></p> <p>i) Consultation with the NFRS will be sought and meetings will be arranged as necessary to discuss the site design and services available to the NFRS at the Site. ii) The detailed BSMP is secured by Requirement 6 of the draft DCO [APP/3.1.1]. iii) The Applicant will consider providing this document during the examination. iv) The Emergency Response Plan is secured via the detailed BSMP, which in turn is secured by Requirement 6 of the draft DCO [APP/3.1.1]. The Applicant does not</p>	<p>The PC would ask that the Applicant produces the detailed BSMP for this examination as per iii). In light of the fire risks of BESS this would allay the concerns of local communities.</p>

	consider it necessary to update Requirement 6 to specifically refer to matters that are already referenced in the oBSMP [APP-194].	
Q15.0.5	<p><i>Potential increase in deer vehicle collisions</i></p> <p>The probability of a deer vehicle collision is not something that sits within the scope of a Stage 1 Road Safety Audit (RSA), as an RSA primarily focusses on highway design features and geometry.</p> <p>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>	<p>The probability of a deer vehicle collision could be assessed if, as the PC has consistently contended, a deer survey is undertaken along with High Grove and the surrounding landowners. The Applicant needs to show how the alignment of deer fencing will work to direct deer away from the roads around the scheme not just the A1065. Fencing will inevitably concentrate them down corridors whereas deer move over a wide area of the general landscape.</p> <p>The Forestry Commission in their RR mention that culling deer maybe an option prior to development. The PC would support this and suggest that culling be included as part of the oOEMP. A deer larder could be included as part of a community benefit. However, culling still requires more knowledge of the numbers moving through the site, High Grove, and the wider landscape.</p>