



Planning Inspectorate

Application by The Droves Solar Farm Limited for The Droves Solar Farm

The Examining Authority's written questions and requests for information (ExQ2): Issued on 2 July 2026

Responses are due by deadline 3: Friday 24 July 2026

The following table sets out the Examining Authority's (ExA's) written questions and requests for information – ExQ2. If necessary, the examination timetable enables the ExA to issue a further round of written questions in due course. If this is done, the further round of questions will be referred to as ExQ3.

Questions are set out using an issues-based framework derived from the initial assessment of principal issues provided as **annex D** to the Rule 6 Letter dated 8 April 2026. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which interested parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number. When you are answering a question, please start your answer by quoting the unique reference number.

You should respond to the questions by using the **Have your say** function on the [project page of the National Infrastructure website](#) and selecting 'Responses to Examining Authority's Second Written Questions (ExQ2)' when asked.

If you are responding to a small number of questions, you can submit your answers by choosing 'Make a comment' and entering your answers in the 'Your comments' box. If you are answering a larger number of questions you should download a copy of the Microsoft Word version of the document, enter your answers and save the document using an appropriate file name. You can then submit the completed document by selecting 'Upload files'.

Microsoft Word version: [Examining Authority's Written Questions 02 \(ExQ2\) \(Word version\) \(Word, 155KB\)](#)



Download a copy of this Microsoft Word version of the ExA's written questions, enter your answers and save the document using an appropriate file name. You can then submit the completed document by choosing 'Make a comment' and selecting 'Upload files'.



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Abbreviations used:

ASI	Accompanied Site Inspection	oCEMP	outline Construction Environmental Management Plan
BESS	Battery Energy Storage System	OHL	Overhead Lines
BCKLWN	Borough Council of King's Lynn and West Norfolk	oDS	outline Decommissioning Strategy
BDC	Breckland District Council	oLEMP	outline Landscape and Ecological Management Plan
BoR	Book of Reference	oOEMP	outline Operational Environmental Management Plan
CA	Compulsory Acquisition	oSMP	outline Soil Management Plan
D	Deadline	PA2008	Planning Act 2008
dDCO	draft Development Consent Order	PRoW	Public Right of Way
DIO	Defence Infrastructure Organisation	PV	Photo-voltaic
EA	Environment Agency	RR(s)	Relevant Representation(s)
ES	Environmental Statement	R	Requirement
ExA	Examining Authority	RSPB	Royal Society for the Protection of Birds
LEMP	Landscape and Ecological Management Plan	SoCG	Statement of Common Ground
LIR(s)	Local Impact Report(s)	SoS	Secretary of State
LLFA	Lead Local Flood Authority	SuDS	Sustainable Drainage System
NH	National Highways	TP	Temporary Possession
NCC	Norfolk County Council	WFD	Water Framework Directive
NGET	National Grid Electricity Transmission plc	WR(s)	Written Representation(s)
NPS	National Policy Statement – published in 2023 (came into force 17 January 2024)		



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The Examination Library

References in these questions set out in square brackets (for example [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link: [XCAT01 - Examination Library template](#)

It will be updated as the examination progresses.

Citation of questions

Questions in this table should be cited as follows:

Question reference: issue reference: question number, for example ExQ2 Q1.0.1 – refers to question 1 in this table.



Index	
1. General and cross-topic questions.....	6
2. Aviation	6
3. Biodiversity and ecology (including Habitats Regulations Assessment).....	6
4. Climate change	7
5. Compulsory acquisition, temporary possession and other land or rights considerations	7
6. Cultural Heritage and archaeology	8
7. Draft Development Consent Order (DCO)	8
7.0 General.....	8
7.1 Part 2 - Principal Powers.....	8
7.2 Part 3 - Streets	8
7.3 Part 5 – Powers of acquisition.....	9
7.4 Schedule 2 - Requirements.....	9
7.5 Schedule 13 – Documents and plans to be certified.....	9
7.6 Schedule 14 – Arbitration rules	9
8. Flood risk, hydrology and water resources	10
9. Grid connection	11
10. Land and soil	11
11. Landscape and visual	12
12. Need, site selection and alternatives	13
13. Noise and vibration	13
14. Population	13
15. Transport and access.....	14
16. Other planning matters	14

ExQ2	Question to:	Question:
1. General and cross-topic questions		
Q1.0.1	The applicant	<p>Proposed ground levels - substations and battery energy storage system</p> <p>Note 7 of ES Figure 6.14 PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme Parts A, B and C [APP-103] [APP-104] [APP-105] states that:</p> <ul style="list-style-type: none"> the siting and placement of both substations within field 27 takes account of a design solution that presents a reasonable worst-case scenario. the base of the National Grid Substation model has been modelled at 55m AOD. the base of the Customer Substation model has been modelled at 60.75m AOD. <p>Figure 16.1 [APP-131] shows that the existing contour level at the north end of field 27 (adjacent to Bartholomew's Hills plantation) is 45m and that this rises at the south end of field 24 to over 75m. ES Figure 5.1: Concept Masterplan [APP-076] shows that the substations and battery energy storage system (BESS) are proposed to be sited in these fields and that the Design Principles, Parameters Commitments [APP-048] states that the maximum height of the substations would be 13m to the top of the busbars (Table 3-3) and that the maximum height of the BESS would be 3.5m (Table 3-2).</p> <p>Could the applicant:</p> <ol style="list-style-type: none"> Confirm what proposed ground level has been modelled for the base of the BESS. Describe the rationale for determining the above modelled levels for the base of the National Grid and Customer substations, and the BESS. Confirm how these modelled levels for the bases of the substations and the BESS would be secured as proposed ground levels in the draft Development Consent Order (dDCO). Confirm whether the existing ground levels would be reinstated following decommissioning of the Customer Substation and BESS, and if so how would this be secured in the dDCO. Confirm whether these modelled levels for the bases of the substations and the BESS have been considered consistently throughout the ES for the assessment of all topics. In particular, provide confirmation that the modelled levels for the bases have formed part of the worst-case scenario for the flood risk assessment, landscape and visual assessment, and noise assessment. Annotate Figure 6.14 Parts A, B and C [APP-103] [APP-104] [APP-105] to show the extent of the proposed substations and BESS locations, together with the existing Bartholomew's Hills plantation. Provide three separate cross section drawings from west to east (from Fincham Drive at the western edge of the existing fields to the A1065), showing the modelled base levels for the National Grid substation, customer substation and the BESS, to include the existing ground levels, extent of screening from existing trees, Rochdale envelopes, proposed earthworks and the extent of the acoustic barrier. Provide a single cross section drawing from north to south (from the north side of Bartholomew's Hills plantation red line boundary to the south end of field 24), showing the modelled base levels for the National Grid substation, customer substation and the BESS, to include the existing ground levels, extent of screening from existing trees, Rochdale envelopes, proposed earthworks and the extent of the acoustic barrier.
Q1.0.2	The applicant	<p>Planning balance – cumulative impacts</p> <p>Regarding cumulative impacts, paragraph 9.4.17 of the Planning Statement [APP-043] states that it is considered that cumulative effects should be afforded neutral weight in the planning balance.</p> <p>Could the applicant provide additional detail for each component to explain further how its neutral weight is derived from consideration of the significant residual adverse impacts from Landscape and Visual, Noise and Vibration and Soils and Agriculture; and the significant residual beneficial impacts from Socio-Economics and Human Health.</p>
2. Aviation		
Q2.0.1	The applicant	<p>Effects on aviation</p> <p>Further to the applicant's response to Written Representations (WRs) and other Deadline (D) 1 submissions [REP2-028], item KLWN1-5, could the applicant provide an outline timetable for the next steps it has identified in engaging with the Defence Infrastructure Organisation (DIO).</p>
3. Biodiversity and ecology (including Habitats Regulations Assessment)		
Q3.0.1	The applicant	<p>Bird surveys – Stone Curlew (<i>Burhinus oedicnemus</i>)</p>

ExQ2	Question to:	Question:
		Further to the applicant's response to WRs and other D1 submissions [REP2-028], item NE2-1, could the applicant confirm if a response has been received from the Royal Society for the Protection of Birds (RSPB) to confirm any additional records that may be held and advise of the proposed next steps.
Q3.0.2	The applicant	<p>Ground-nesting bird mitigation habitat sequencing</p> <p>The ExA notes the applicant's response to ExQ1 Q3.0.3 [REP1-069] which refers to the updated outline Landscape and Ecological Management Plan (oLEMP) [REP1-061] confirming that a suitable phasing schedule will be included within the detailed Landscape and Ecological Management Plan (LEMP) once the associated timescales for the construction phase become clear. Could the applicant provide a reference to the paragraph number where this is confirmed in the oLEMP.</p>
Q3.0.3	Borough Council of King's Lynn and West Norfolk	<p>Skylark mitigation strategy</p> <p>Further to the applicant's response to Local Impact Reports (LIRs) [REP2-027], item BKLWN19, regarding questions on skylark mitigation strategy from the Borough Council of King's Lynn and West Norfolk (BCKLWN), could BCKLWN confirm whether the applicant's response addresses its concern.</p>
4. Climate change		
Q4.0.1	The applicant	<p>Sourcing of solar panels and batteries</p> <p>The applicant's response to ExQ1 Q4.0.3 [REP1-069], includes that efforts would be made to source products and materials locally wherever possible, and that this would be achieved through the applicant's commitments through the Solar Stewardship Initiative. Could the applicant explain how its commitments through the Solar Stewardship Initiative would be secured in the dDCO?</p>
5. Compulsory acquisition, temporary possession and other land or rights considerations		
Q5.0.1	The applicant	<p>Funding statement - decommissioning cost estimate</p> <p>Further to the applicant's response to ExQ1 Q5.0.13 [REP1-069], and given that the existing cost estimate (Section 2.2, Funding Statement [AS-006]) does not refer to decommissioning costs, could the applicant provide a revised funding statement or additional information that clearly demonstrates that decommissioning can be suitably funded by the applicant.</p>
Q5.0.2	The applicant	<p>Option agreements</p> <p>Further to the applicant's response to ExQ1 Q5.0.1 [REP1-069], does the applicant envisage that it would have the consent it requires to be able to confirm the durations of the lease included in the Option Agreements for the Solar Photo-voltaic (PV) Site, the BESS and the National Grid and Customer Substations, before the end of the examination?</p>
Q5.0.3	The applicant - Part (i) Norfolk County Council – Part (ii)	<p>Possible impediments</p> <p>Further to Norfolk County Council's (NCC) response to ExQ1 Q5.0.8 [REP1-095], could the applicant and NCC provide updates to their previous responses to ExQ1 Q5.0.8 which has been updated below to take account that Breckland District Council's (BDC) responded for part (ii):</p> <p>(i) Is the applicant aware of any land or rights being required in addition to those sought through the dDCO [REP1-005] before the proposed development can become operational?</p> <p>(ii) Do NCC have any concerns about whether potential impediments to the development have been properly identified and addressed? Is NCC aware of any matters within or outside the scope of the dDCO that may have a bearing on whether the development could become operational, or may not be satisfactorily resolved, including in relation to acquisitions, consents, resources, or other agreements?</p>
Q5.0.4	National Highways Norfolk County Council	<p>Highway land and interests</p> <p>Could National Highway (NH) provide a response to ExQ1 Q5.0.9 [PD-007] which is repeated below. Further to NCC's response to ExQ1 Q5.0.9 [REP1-095], could NCC provide an update to their previous response to ExQ1 Q5.0.9.</p> <p>Are NCC and NH in their role as the Highway Authorities aware of:</p> <p>(i) Any reasonable alternatives to the Compulsory Acquisition (CA) or Temporary Possession (TP) sought by the applicant; and/or</p> <p>(ii) Any areas of land or rights sought by the applicant that they consider would not be needed.</p>
Q5.0.5	The applicant	<p>Protective provisions</p> <p>Further to the applicant's response to ExQ1 Q5.0.15 [REP1-069], could the applicant provide a further update on the progress of negotiations for protective provisions with each of the parties set out in Schedule 15 of the dDCO [REP1-005].</p>

ExQ2	Question to:	Question:
Q5.0.6	The applicant	<p>Plot reference number 2-15 shown on the Land Plan</p> <p>With reference to Section 4.1.1, Book of Reference (BoR) [REP1-009], could the applicant provide clarification as to why CA of new rights and imposition of restrictions over land are required for the section of plot reference number 2-15 (Sheet 4, Land plans [APP-008]), which is located between Finger Hill cabin and the intersection of northern boundaries of fields 12 and 13.</p>
6. Cultural Heritage and archaeology		
Q6.0.1	The applicant	<p>Scenario A (both existing and new pylons) and Scenario B (double turn in option)</p> <p>Environmental Statement (ES) ES Chapter 8 [APP-057], paragraph 8.8.29, sets out that the applicant's preferred solution is the double turn in option which would allow for the decommissioning and removal of the existing section of overhead line (Scenario B), thereby reducing long term visual and heritage impacts on the local area. Could the applicant also set out its view on whether there are any disadvantages with Scenario B compared with Scenario A (both existing and new pylons).</p>
Q6.0.2	Norfolk County Council	<p>Pre-construction archaeological mitigation in PV panel areas</p> <p>Could NCC confirm whether it is content with the applicant's response to WRs and other D1 submissions [REP2-028], item NCC6, regarding decommissioning of piling in PV panel areas.</p>
7. Draft Development Consent Order (DCO)		
7.0 General		
Q7.0.1	The applicant	<p>Changes to the dDCO if substation is located outside of Order limits</p> <p>Could the applicant explain what changes it believes should be made to the dDCO if National Grid Electricity Transmission (NGET) do decide that the sub-station should be located elsewhere i.e. not within the Drove Order limits.</p>
7.1 Part 2 - Principal Powers		
Q7.1.1	The applicant	<p>Article 6 - Disapplication and modification of legislation, etc.</p> <p>In its WR at D2 [REP2-035], the Environment Agency (EA) states that under Section 150 of the Planning Act 2008, it does not consent to disapplication of Regulation 12 of the Environmental Permitting Regulations 2019 with respect to flood risk activities. It states it is not necessary to disapply Regulation 12, because no Flood Risk Activity Permits (FRAP) are required given the Order limits are not within the floodplain of a main river.</p> <p>On the basis of the EA's position, does the applicant agree that sub-paragraph (e) of Article 6 and Part 6 of Schedule 15 (Protective Provisions) of the dDCO [REP2-004] are no longer required? If it disagrees, could the applicant give a clear explanation for retention of these parts of the dDCO and set out a timetable for seeking the EA's consent under Section 150 of the Planning Act prior to the end of the Examination?</p>
Q7.1.2	The applicant	<p>Article 7 - Defence to proceedings in respect of statutory nuisance</p> <p>With reference to Article 7(2) of the dDCO [REP1-004], the applicant is asked to review the wording for consistency with title of Section 61 of the Control of Pollution Act 1974 which refers to 'Prior consent for work on construction sites' and consider whether 7(2) should be revised to include 'Prior' as shown below in bold:</p> <p>"Section 61(9) (Prior consent for work on construction sites...)"</p>
7.2 Part 3 - Streets		
Q7.2.1	The applicant	<p>Article 8 - Streetworks</p> <p>The ExA notes the inclusion of paragraph 8(4) in the recently made Springwell Solar Farm Order. This provision was inserted by the Secretary of State (SoS) to make clear the meaning of apparatus. Please include a similar provision in the draft Order or explain why it is not necessary.</p>
Q7.2.2	Norfolk County Council	<p>Article 10 - Power to alter layout, etc., of streets</p> <p>Further to the applicant's response to LIRs [REP2-027], item NCC68 regarding Article 10 (4), could NCC confirm whether it accepts the applicant's explanation as to why it does not propose to depart from well precedented drafting in made solar DCOs in this regard.</p>
Q7.2.3	The applicant	<p>Article 16 - Traffic Regulation Measures</p>

ExQ2	Question to:	Question:
		The ExA notes from the recently made Springwell Solar Farm Order, the amendment by the SoS to Article 17(6) to include Article 17(6)(c) which requires the undertaker to display a site notice with the information required by Article 17(6)(a)–(b). This is consistent with the position taken in previous DCOs. Please include a similar provision in the draft Order for Article 16(5) or explain why it is not necessary.
7.3	Part 5 – Powers of acquisition	
Q7.3.1	The applicant	Article 27 - Power to override easements and other rights The ExA notes from the recently made Springwell Solar Farm Order, the amendment to Article 27(4) by the SoS to include the words ‘ <i>or any contractors, servants or agents of the undertaker</i> ’. Please include a similar provision in the draft Order for Article 27(4) or explain why it is not necessary.
Q7.3.2	The applicant	Article 39 - Planning permission, etc. Could the applicant provide a more specific justification in the EM [REP2-007] as to why these provisions are necessary in this dDCO in the particular circumstances of the proposed development. Is the applicant able to provide examples of precedents in articles from other solar farm projects?
Q7.3.3	The applicant	Article 41 - Trees subject to tree preservation orders The ExA notes from the recently made Springwell Solar Farm Order, the amendment to Article 40 to include a new paragraph 5. This provision was inserted by the SoS to make clear the meaning of tree preservation order. Please include a similar provision in the draft Order for Article 41 or explain why it is not necessary.
Q7.3.4	The applicant - Parts (i) & (ii) Environment Agency – Part (iii)	Article 49 - Maintenance of drainage works (i) Could the applicant provide a more detailed justification as to why these provisions are necessary in this particular dDCO in the circumstances of the proposed development, particularly given ES Chapter 11 [AS-019] notes in paragraph 11.6.23 that the soils are free-draining and there are no extensive under-field drainage schemes within the Order limits. (ii) Could the applicant confirm whether its approach has been accepted in any previously made DCOs. (iii) Could the EA comment on whether it considers these provisions are necessary.
7.4	Schedule 2 - Requirements	
Q7.4.1	The applicant	Requirement (R) 5 - Detailed design approval Limits of deviation are not included in the dDCO [APP-018]. Could the applicant confirm whether the limits of deviation for the pylons are included within the parameters referred to in the Design Principles, Parameters and Commitments [APP-048] (to be certified in Schedule 13 of the dDCO).
Q7.4.2	Breckland District Council – Part (i) Norfolk County Council as the Lead Local Flood Authority (LLFA) – Part (ii)	R11 – Surface and foul water drainage (i) Is BDC content with the applicant’s response [REP1-074] to ExQ1 Q7.5.4 [REP1-086] regards the inclusion of the Lead Local Flood Authority (LLFA) as a consultee in R11? (ii) Could the LLFA comment on whether they consider the wording of R11 as set out in the dDCO submitted at D1 [REP1-004] would be adequate in securing commitment to the surface water mitigation and drainage principles put forward in the Flood Risk Assessment [AS-053]?
Q7.4.3	Norfolk County Council	R12 – Archaeology Further to the applicant’s response to LIRs [REP2-027], item NCC61 regarding R12 – Archaeology, could NCC confirm whether it accepts the applicant’s explanation that the concerns raised by NCC are already addressed in R12 and the related documents, and therefore does not propose to depart from well precedented drafting in made solar DCOs in this regard.
Q7.4.4	The applicant	R13 – Construction environmental management plan R13 (1) Could the applicant explain what the approval process would be for the proposed permitted preliminary works environmental management plan which is referred to in R13(1) of the dDCO [REP2-005].
7.5	Schedule 13 – Documents and plans to be certified	
Q7.5.1	The applicant	Part 1 – Documents and Plans Could the applicant explain in the Explanatory Memorandum its rationale for its choice of including only certain ES chapters in Schedule 13, Part 1, of the dDCO [REP2-005].
7.6	Schedule 14 – Arbitration rules	

ExQ2	Question to:	Question:
Q7.6.1	The applicant	<p>Article 8 - Confidentiality</p> <p>The ExA notes from the recently made Springwell Solar Farm Order, the amendment to Article 7 by the SoS so that arbitration hearings and documentation are open to and accessible by the public (para 7(1)), with the arbitrator empowered to direct privacy or confidentiality to protect commercially sensitive information (para 7(2)) and an express carve-out for disclosures required by court order or enactment (para 7(3)).</p> <p>Please include a similar provision in the draft Order for Article 8 or explain why it is not necessary.</p>
8. Flood risk, hydrology and water resources		
Q8.0.1	Environment Agency	<p>Groundwater impact assessment update</p> <p>In response to ExQ1 Q8.0.3, the EA [REP1-086] stated that it was an acceptable approach for the applicant to update ES Chapter 12: Water Resources [APP-061] at D2 to reflect further discussions between the EA and the applicant on the use of groundwater models. It also states in its response, that provided adequate post-consent monitoring are secured and based on the proposed measures set out in the oCEMP [REP2-023], it concurs with the applicant's Water Framework Directive (WFD) assessment (REP2-012) that significant risks to the WFD Groundwater body can be adequately mitigated. Based on the updated ES Chapter 12 [REP2-010] submitted at D2, the updated WFD assessment at D2, and the Technical Information Note – Groundwater Elevation Methodology document [REP2-029], could the EA confirm whether it:</p> <ul style="list-style-type: none"> (i) considers its concerns with groundwater flow and level information and the adequacy of the groundwater impact assessment have been addressed. (ii) remains in agreement with the findings of the applicant's WFD assessment conclusions regarding likely WFD compliance impacts on groundwater bodies impacted by the proposed development.
Q8.0.2	The applicant	<p>The Sequential Approach and mitigation pluvial flood risk</p> <p>In addition to the applicant's response to ExQ1 Q8.0.6 [REP1-069], and noting that detailed design is not available pre-consent and hence cannot be relied upon, can the applicant:</p> <ul style="list-style-type: none"> (i) assist with demonstration of the sequential approach (and compliance with 5.8.29 and bullet 3 of 5.8.36 of NPS EN-1) by explaining clearly why more vulnerable elements of the proposed development have to be located in areas of pluvial flood risk, even where this pluvial risk encroachment is limited to a small section of the proposed works and/or may be avoided by detailed design? Can the applicant articulate what other factors require these more vulnerable aspects of the proposed development to be located where they are at this stage of design so that the specific requirements of the NPS sequential approach policy can be shown to be met? (ii) in relation to the stated assertion in the applicant's response to relevant representations (RRs) [REP1-067] that the pluvial flow paths can be managed by the proposed Sustainable Drainage System (SuDS) system, provide certainty that the SuDS drainage system would be designed to have sufficient capacity for rainfall generated by the impermeable areas of the proposed development catchment, the fire suppressant volume and rainfall originating outside of the calculated catchment area which manifests as the pluvial flow paths identified?
Q8.0.3	Norfolk County Council as the Lead Local Flood Authority (LLFA)	<p>Surface water runoff from impermeable areas during operation</p> <p>In the applicant's response to RRs [REP1-067], it states that the Flood Risk Assessment (FRA) [AS-053] makes a commitment that gravel filter drains would be used around the perimeter of the invertor and conversion units to capture any surface water runoff generated from the small introduction of impermeable areas. The response also states that the FRA commits new access tracks to be served by trackside drainage ditches or swales.</p> <p>Could the LLFA confirm whether it considers this an adequate provision of SuDS for these elements of the proposed development and that commitment to designing these drainage features to the required design flood event is adequately secured in the dDCO, in accordance with bullet 5, paragraph 5.8.36 of NPS EN-1?</p>
Q8.0.4	Norfolk County Council as the LLFA - Part (i) The applicant - Part (ii)	<p>Ordinary watercourse land drainage consent</p> <p>The updated Operational Environmental Management Plan (oOEMP) [REP2-024] at table 3-7 states that works involving watercourses would ordinarily require Land Drainage Consents from the LLFA, and that it is intended that these requirements would be disapplied through the DCO; this is reflected in Article 6 (1) sub paragraphs a to b of the dDCO [REP2-004] which would disapply the relevant parts of the Land Drainage Act 1991. In its response to ExQ1 Q 8.0.10 [REP1-069], the applicant states that in-stream engineering works will not require Ordinary Watercourse consent from the LLFA; ES Chapter 12, section 12.8.58 states this is because the identified ditches within the Order limits are not connected to the wider hydrological network and so they are not classed as ordinary watercourses.</p>

ExQ2	Question to:	Question:
		<p>(i) Could the LLFA confirm they agree with the applicant's view that watercourses identified within the Order limits are not defined as ordinary watercourses and therefore comment on the appropriateness of disapplication of the relevant parts of the Land Drainage Act?</p> <p>(ii) Could the applicant confirm why, through Article 6, they are seeking to disapply the relevant parts of the Land Drainage Act through the draft DCO if they are of the view there are no ordinary watercourses affected by the proposed development and hence no works requiring land drainage consent from the LLFA?</p>
Q8.0.5	The applicant	<p>Update to flood mapping</p> <p>The Environment Agency published an update to the Flood Map for Planning online data set in May 2026. Could the applicant comment on whether the updated data set would have implications for the FRA [AS-053] or the assessment of flood risk effects set out in ES Chapter 12 [APP-061]?</p>
Q8.0.6	Norfolk County Council as the LLFA	<p>Pluvial modelling acceptance</p> <p>The Statement of Common Ground (SoCG) between NCC and the applicant submitted at D1 [REP1-019] demonstrates a disagreement between the LLFA and the applicant regards the adequacy of the applicant's 2D pluvial model which has been used to define surface water flood risk and mitigation. Could the LLFA:</p> <p>(i) With reference to Policy Compliance Document [REP1-015] confirm whether there are any NPS policies it considers the proposed development would not be in compliance with based on the status of the model at D2?</p> <p>(ii) Set out whether there are any implications for the applicant's proposed surface water flood risk mitigation if the assessment was based on the EA's latest surface water mapping dataset instead of its pluvial model?</p>
Q8.0.7	The applicant	<p>Resolving issues with the LLFA</p> <p>At D1, the SoCG between the applicant and NCC [REP1-019] shows a number of unresolved issues in discussion (amber), and four issues rated red indicating both parties have reached a position that a matter cannot be agreed.</p> <p>Could the applicant set out a timetable of proposed actions it intends to undertake to attempt to resolve these issues set out in the SoCG?</p>
9. Grid connection		
Q9.0.1	National Grid Electricity Transmission plc	<p>Scenario A (both existing and new pylons) and Scenario B (double turn in option)</p> <p>ES Chapter 8 [APP-057], paragraphs 8.8.26 to 8.8.30, describes both Scenarios A (both existing and new pylons) and B (double turn in option) for the connection to the proposed National Grid substation. Paragraph 8.8.29 sets out that the applicant's preferred solution is Scenario B, which would allow for the decommissioning and removal of the existing section of overhead line, thereby reducing long term visual and heritage impacts on the local area. ES Appendix 5.1 Illustrative Technical Information (Tracked) Section 2: Illustrative Grid Connection Infrastructure Routing [REP1-047] provides a plan view showing the proposed double turn in diversion which shows the extent of the overhead line to be removed to the north of Bartholomew's Hill plantation.</p> <p>Could NGET provide its view regarding the principle of implementing the type of connections represented in Scenarios A and B.</p>
Q9.0.2	The applicant	<p>Scenario A (both existing and new pylons) and Scenario B (double turn in option)</p> <p>Further to the applicant's response to ExQ1 Q9.0.1 part (iv) [REP1-069], the ExA notes that ES Appendix 5.1 Illustrative Technical Information (Tracked) Section 2: Illustrative Grid Connection Infrastructure Routing [REP1-047] provides a plan view showing the proposed double turn in diversion which shows the extent of the overhead line to be removed to the north of Bartholomew's Hill plantation.</p> <p>(i) Could the applicant confirm whether Scenario A (both existing and new pylons) is shown in its photomontages ES Figure 6.14 PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme Parts A, B and C [APP-103] [APP-104] [APP-105].</p> <p>(ii) Could the applicant confirm whether Scenario A (both existing and new pylons) is shown in its wirelines ES Figure 6.12 PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires Parts A, B, C and D [APP-095] [APP-096] [APP-097] [APP-098].</p>
10. Land and soil		
Q10.0.1	Natural England	Siting of the substation and BESS

ExQ2	Question to:	Question:
		Could Natural England confirm if it is content with the applicant's response to WRs and other D1 submissions [REP2-028], item NE2-5, regarding the siting of the substation and BESS, which concludes that the applicant trusts that this addresses the concern and that re-siting is therefore not required.
Q10.0.2	The applicant	<p>Outline Soil Management Plan</p> <p>Further to the applicant's response to WRs and other D1 submissions [REP2-028], item NE1-3 Soils, which included concerns from Natural England that the outline Soil Management Plan is currently high-level and does not yet provide sufficient detail, could the applicant set out a timescale for engagement with Natural England and updates to the outline Soil Management Plan (oSMP).</p>
Q10.0.3	Breckland District Council Norfolk County Council	<p>Decommissioning of underground cables</p> <p>Could the Councils confirm if they are content with the applicant's update to the outline Decommissioning Statement (oDS) [REP1-059] which includes, in paragraph 2.1.5, that for any buried cables proposed to be left in situ, an environmental risk assessment would be carried out and the Best Practicable Environmental Option (BPEO) would be implemented.</p>
11. Landscape and visual		
Q11.0.1	The applicant	<p>Residential Visual Amenity Assessment</p> <p>ES Appendix 6.7 Residential Visual Amenity Assessment [APP-145], paragraph 7.3.31 references that the proposed development would be offset from P1 – Keeper's cottage's property curtilage, with a generous field margin proposed along the northern edge of Field 11 and that on balance the visual effect at this property would not reach the Residential Visual Amenity Threshold.</p> <p>For its assessment of Keeper's cottage, could the applicant confirm the dimensions assumed for the proposed field margin, the threshold limit and how the proposed dimensions for the field margin would be secured in the dDCO.</p>
Q11.0.2	The applicant	<p>Landscape and visual effects for new pylons</p> <p>Table 3-5 of Design Principles, Parameters Commitments [APP-048] states that the new pylons would be a maximum height above ground level of 55m and that this is broadly similar to the existing pylons.</p> <p>(i) Given the modelled ground levels discussed in ExQ2 Q1.0.1 above, could the applicant confirm if the maximum height above ground level is the maximum height above <u>existing</u> ground level, particularly for the pylons providing connections to the National Grid substation, and what the height of the existing pylons are?</p> <p>(ii) For viewpoint VP12 Castle Acre Priory - Could the applicant explain why there appears to be a considerable difference between the height of the photowire shown in ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires (Part C) (Clean) (Revision 1) [AS-027] and the height of the pylons shown in the photomontage in ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme (Part B) (Revision 1) [AS-042] on the horizon behind the Priory?</p> <p>(iii) Could the applicant explain its approach to the mitigation hierarchy for the grid connection infrastructure, and the new pylons in particular.</p>
Q11.0.3	The applicant	<p>ES Figure 6.12 Viewpoint 6 - Public Right of Way (PRoW) South Acre RB2</p> <p>ES Figure 6.12 Viewpoint 6 - ProW South Acre RB2 Part A [APP-095] shows the legends for and the maximum extents of both the siting zones for Solar PV Array (modelled at 4.5m high) and for Grid Connection Infrastructure (modelled at 55m high). The legends are also shown for the maximum extents of siting zones for the BESS (modelled at 3.5m high), Customer Substation (modelled at 13m high), and National Grid Substation (modelled at 13m high).</p> <p>(i) Could the applicant confirm whether the wirelines views in ES Figure 6.12 Part A [APP-095] are correct in that the BESS, Customer Substation and National Grid Substation would not be visible from this viewpoint.</p> <p>(ii) Could the horizon on Figure 6.12 [APP-095] be annotated to show the extent of the proposed substations and BESS locations, together with the existing Bartholomew's Hill plantation.</p> <p>(iii) Could the applicant confirm if the right side of Wireline (right) is modelled correctly as the right hand edge terminates before the existing woodland whereas works plan [APP-009] shows that the extent of the solar PV array area continues to meet the existing woodland.</p>
Q11.0.4	The applicant	<p>Protection of key landscape features</p> <p>(i) Further to the applicant's response to LIRs [REP2-027], item BKLWN13 paragraph 2.4.3 could the applicant also provide additional information to address how the protection of key landscape features (including Bartholomew's Hill Plantation) adjoining the Order limits would be secured in the dDCO.</p>

ExQ2	Question to:	Question:
		(ii) Further to the applicant's response to WRs and other D1 submissions [REP2-028], item HE50, could the applicant comment on Historic England's point that 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.
Q11.0.5	The applicant	Landscape and visual cumulative effects assessment In addition to its explanation in ES Chapter 6 [APP-055], could the applicant provide further justification as to why it does not consider future development outside its 3km search area needs to be considered in the landscape and visual cumulative effects assessment relative to landscape character areas (local and national).
Q11.0.6	Norfolk County Council Breckland District Council	Good design With reference to the applicant's response to ExQ1 Q1.0.04 [REP1-069], do the Councils consider that sufficient design content is secured to ensure its future consenting will meet the landscape, visual and good design objectives of the NPS?
Q11.0.7	Norfolk County Council Breckland District Council	Strategic landscape cumulative effects Paragraph 12.24 of BDC's LIR [REP1-079] includes particular concerns regarding the assessment of the wider cumulative landscape effects, particularly at a strategic scale across Breckland and Norfolk. Could BDC and NCC define what they consider to be an appropriate spatially defined landscape character baseline to use for the landscape and visual cumulative effects assessment.
Q11.0.8	Breckland District Council	Visual effects With reference to paragraph 12.28 of BDC's LIR [REP1-079] regarding visual effects, could BDC provide more specific details regarding where it considers that some of the effects have been underplayed.
Q11.0.9	Norfolk County Council Breckland District Council	Control of light (i) Could the Councils advise if they are content with the update to the oOEMP [REP2-025], which requires in paragraph 2.7.3, that a detailed lighting assessment would be undertaken of the required lighting and a sensitive lighting strategy would be set out within the detailed OEMP. (ii) Could the Councils advise if they are content with the revision to the outline Construction Environmental Management Plan (oCEMP) [REP2-023], which requires in paragraph 2.6.1, that a detailed lighting assessment would be undertaken and a sensitive lighting strategy would be set out within the detailed CEMP, along with any requirements for lighting outside standard working hours would be set out within the CEMP, secured by R13 of the dDCO.
Q11.0.10	Breckland District Council	Glint and glare assessment Could BDC confirm whether it is content with the applicant's response to ExQ1 Q11.0.5 [REP1-069] regarding glint and glare, and in particular the concerns relating to site survey, the cumulative impacts and the complaints procedure.
12. Need, site selection and alternatives		
Q12.0.1	The applicant	Choice of technology The Planning Statement [REP1-013], paragraph 8.2.25, refers to "ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology." Could the applicant signpost to specific paragraphs within ES Chapter 4 [APP-053], which describes the consideration of reasonable alternatives in relation to choice of technology.
13. Noise and vibration		
Q13.0.1	Breckland District Council	Cumulative noise levels at The Off Barn Could BDC confirm whether it is content with the applicant's update to paragraph 2.5.4 of the oCEMP [REP1-051] regarding cumulative noise levels at The Off Barn.
14. Population		
Q14.0.1	The applicant	Planning balance – permissive paths Paragraph 9.4.8 of the Planning Statement [APP-043] states that the PRoW should be afforded moderate positive weight in the planning balance. (i) Could the applicant provide further detailed information with specific references to the ES to support its weighting.

ExQ2	Question to:	Question:
		(ii) Does the weighting take account of the view raised below by BDC in its LIR [REP1-079] paragraph 2.18, that: <i>“The Applicant proposes permissive paths and enhancements to the access network. While these measures provide public benefit, they do not alter the fact that the Scheme would materially change the experience of moving through this part of the Breckland landscape.”</i> (iii) Does the weighting include the new permissive paths outside of the Order limits?
Q14.0.2	Norfolk County Council	Safe operation of BESS Could NCC confirm whether it is content with the applicant’s response to LIRs [REP2-027], items NCC56 to NCC58, regarding Norfolk Fire and Rescue’s requests in Section 16 of NCC’s LIR [REP1-094].
15. Transport and access		
Q15.0.1	The applicant	Deer fencing design Further to the applicant’s response to ExQ1 Q15.0.5 [REP1-069], could the applicant provide further detail to support its response that <i>“it is considered that any concerns about deer collisions would be mitigated appropriately through the alignment of any deer fencing, which would be strategically placed to secure routes that avoid directing deer towards roads and the A1065”</i> . In particular, please provide reference to details of deer fencing design, to include alignment, within the ES or other documents and how this would be secured in the dDCO.
16. Other planning matters		
Q16.0.1	The applicant	Natural England’s standard advice on air quality Table 4.2, SoCG – Natural England [REP1-092] notes that for International and National Designated Sites that the status is agreed but Natural England’s standard advice on air quality should be considered. In addition to the applicant’s response to WRs and other D1 submissions [REP2-028], item NE1-2, could the applicant comment specifically on whether Natural England’s standard advice has been considered?