

BRECKLAND DISTRICT COUNCIL

The Drovers Solar Farm (EN0110013)

Response to the Examining Authority's Second Written Questions (ExQ2)

Deadline 3 – 24 July 2026

1.0 Introduction

1.1 This document provides Breckland District Council's ("the Council") response to the Examining Authority's (ExA) Second Written Questions (ExQ2).

1.2 The responses should be read alongside:

- The Council's Relevant Representations (RR)
- The Council's Local Impact Report (LIR)
- The evolving Statements of Common Ground (SoCG)
- The Council's response to the Examining Authority's First Written Questions (ExQ1)

1.3 The Council has responded only to those questions directed to it or where it considers it appropriate to do so.

1.4 The Council's responses focus on matters within its remit as Local Planning Authority and draw upon internal officer input where available. Where the matters raised fall outside the Council's technical expertise, appropriate reliance is placed on the advice of relevant statutory consultees.

2.0 Second Written Questions and the Council's Responses

2.1 The following section lists the questions directed to Breckland Council and its responses in the order of the document issued by the Examining Authority on 2nd July 2026.

7.0 Draft Development Consent Order (DCO)

ExQ2 Q7.4.2 – Schedule 2 – Requirements, R11: Surface and foul water drainage

Question

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?

Response

Norfolk County Council is not “*the relevant planning authority*” for the DCO. Applications for the discharge of requirements would be submitted to, and determined by, Breckland District Council. However, the Council considers that Norfolk County Council should be expressly named as a consultee in Requirement 11 in its capacity as Lead Local Flood Authority.

The applicant’s response [REP1-074] to ExQ1 Q7.5.4 [REP1-086] states that it is not necessary to directly name the LLFA directly. However, given that the protective provisions in Part 7 of Schedule 15 of the draft DCO [APP/3.1.1] already require the submission of plans relating to works proximate to drainage works or ordinary watercourses to the LLFA, the Council considers that an express consultation requirement would provide helpful clarity and would assist the effective discharge of Requirement 11.

The Council’s concern is a practical one. In its experience, it can be difficult to secure timely consultee comments where the consultee is not expressly identified in the relevant requirement. The Council does not hold the specialist drainage expertise necessary to assess such matters independently without LLFA advice.

10.0 Land and Soil

ExQ2 Q10.0.3 – Decommissioning of underground cables

Question

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.

Response

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.

The Council is supportive of the principle of an environmental risk assessment for any buried cables proposed to be left in situ and implementation of the Best Practicable Environmental Option.

From a planning perspective, the Council considers that a balancing exercise is required between:

- the short-term environmental impacts of decommissioning works; and
- the longer-term implications for the future use of the land, including agricultural use.

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.

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, and whether any future constraints are capable of being adequately managed and secured through the decommissioning process. Please refer to the LIR for further detail on the Council's significant concerns in this regard.

11.0 Landscape and Visual

ExQ2 Q11.0.6 – Good design

Question

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?

Response

The Council has consulted its independent Landscape Consultant (The Richards Partnership) in relation to future consenting and securing sufficient design post consent.

ES Chapter 5 (The Scheme) provides indicative images of the various major components of the scheme e.g. substations, solar panels, BESS etc. The photomontages and the supporting description in the Design Principle, Parameters and Commitments document provide sufficient information to inform the understanding of how the solar panels will sit in the landscape.

In addition, ES Figure 5.1: Concept Masterplan shows '*areas for mitigation and enhancement*'. This is supplemented by the appendices of the oLEMP which provide additional detail regarding the nature of the proposed planting.

The Council considers that there is broadly sufficient content and associated controls within the draft DCO to ensure its future consenting will meet the landscape and visual design objectives. However, some additional detail would be welcomed to assist in further understanding.

The Council notes that paragraph 1.3.1 of the Design Principles, Parameters and Commitments document states that Tables 3.1 to 3.9 are secured by Requirement 5. However, Requirement 5 appears to apply only to Work Nos. 1, 2 and 3A and requires submitted details to accord only with Tables 3-1, 3-2 and 3-3, as applicable.

The Council therefore seeks clarification as to the mechanism by which the parameters and commitments in table 3-4 (National Grid Substation), table 3-5 (pylons, overhead lines etc), table 3-6 (cabling), table 3-8 (access points - Req 5 only

requires details of access points for Work Nos. 1, 2 and 3a) are secured, discharged and enforced. It is noted that tables 3-7 (construction and decommissioning compounds) and 3-9 (permissive paths) are secured via alternative draft DCO requirements.

Furthermore, The Council also notes that detailed design controls for other NSIP energy infrastructure within Breckland District have included more developed provisions, including the requirements associated with the following DCOs:

- Norfolk Vanguard Offshore Wind Farm Order 2022; and
- Norfolk Boreas Offshore Wind Farm Order 2021.

The Council therefore seeks clarification on the mechanism by which Tables 3-4 to 3-9 are secured, discharged and enforced. This is particularly important where those tables include commitments requiring matters to be agreed with the relevant planning authority prior to construction.

The Council considers that either Requirement 5, the Design Principles, Parameters and Commitments document, or another appropriate DCO mechanism should be amended or clarified to ensure consistency between the certified document and the operative requirements of the DCO.

Additionally, details of the proposed bund parameters would be helpful (max length, width, height).

ExQ2 Q11.0.7 – Strategic landscape cumulative effects

Question

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.

Response

The Council has consulted its independent Landscape Consultant (The Richards Partnership) in relation to an appropriate spatially defined landscape character baseline.

The Council remains concerned about the cumulative effects associated with energy infrastructure projects coming forward in Breckland and the wider area.

Landscape Character

The applicant has used the Breckland Landscape Character Assessment (May 2007) for their baseline assessment work. This is the Council's adopted evidence base and as such is appropriate. However, it is nearly 20 years old and, while it does make

reference to the capacity of the landscape to accommodate wind turbines, it does not make reference to the capacity of the landscape to accommodate solar farms along with other energy infrastructure projects. Since the publication of this document a number of substantial solar/energy developments have been built or have been consented within the district and the wider county area. The Council would expect some further work/analysis of the landscape to be undertaken by the applicant to understand the changes in the landscape since the 2007 assessment.

While existing and consented schemes are considered to be part of the baseline, the landscape only has so much capacity to absorb further developments of this nature before giving rise to significant adverse effects on a wider area. As such, developments of this nature, taken together with those already in existence, cumulatively affect the character of the area.

The attached plan (produced by CRPE - [The scale of the threat - CPRE Norfolk](#)) illustrates known energy infrastructure schemes that are built, consented, or currently the subject of planning applications in the vicinity of the Order Limits.

The Council considers that there should be an assessment of the cumulative effects of energy infrastructure in relation to the following Breckland Landscape Character Areas:

- D1 - Swaffham Heath; and
- E6 - North Pickenham Plateau

Visual Amenity

The Council considers that there should be an assessment of any areas where the Zone of Theoretical Visibility (ZTV) studies of proposed or existing solar farms intersect with the ZTV for the application site in order to assist in the assessment of cumulative visual effects.

Cumulative Effects on the Wider Area

While the Council acknowledges that this is not the responsibility of the applicant for The Drovers, it wishes to draw the Inspector's attention to the many energy infrastructure projects that have been built/are coming forward in Breckland and the wider county area and its significant concerns regarding the cumulative effects on the landscape character and visual amenity within the area.

In addition, the Council is concerned about sequential cumulative effects along key routes within the district, with the A47 between Dereham and Swaffham being of particular concern.

ExQ2 Q11.0.8 – Visual effects

Question

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.

Response

The Council has consulted its independent Landscape Consultant (The Richards Partnership) in relation to underplayed visual effects.

The Council considers that the following views have been underplayed:

Views along the A1065 (slight effect in the short term/slight-minimal in the long term)

Viewpoint 1 (in the submitted LVIA) is the only viewpoint along this stretch of busy road. The view is located where views of the application site are well contained, even in winter. Further to the north, views open out and there are clear, expansive views over the site and the landscape to the west. These views will be lost with the introduction of the scheme and as such the Council considers that these effects have been underplayed.

Further work has been undertaken and Viewpoints 18 and 20 (from the A1065) are now included with photomontages. The applicant maintains that the effects for the road corridor would remain *slight effect in the short term/slight-minimal in the long term*. The Council maintains that the loss of the expansive open views over this landscape has not been accounted for.

Viewpoint Group 1 (within the site) (Major-Moderate to Moderate (significant) in the short term/moderate in the long term)

Viewpoint Group 2 (within the site) (Major-Moderate (significant) in the short term/moderate in the long term)

The Council considers that the significant visual effects experienced within and in the immediate vicinity of the application site would remain *significant adverse* in the long term, primarily as a result of the loss of the open and panoramic views which characterise this area. The applicant contends that these *significant adverse* effects would not endure into the long term as a result of the hedgerow planting which has been recently introduced and which would help to contain views of the solar panels.

The Council acknowledges that there was a substantial amount of hedgerow loss over the course of the Twentieth Century and that this has resulted in the relatively open landscape that people experience today and which affords open and panoramic views over the wider area. The Council considers that this is now a characteristic of the Breckland landscape, as acknowledged in the Breckland LCA.

The applicant contends that in restoring the historic hedge lines, the long-term effects would reduce to *non-significant*. However, the Council consider that this does not acknowledge the loss of the views which are characteristic of this area, as acknowledged in the Breckland LCA.

The following extracts from the Breckland LCA acknowledge the open nature of this landscape:

D1 Swaffham Heath – Visual Sensitivities

A predominantly open large landscape with long, open views. Within the more enclosed wooded areas vistas which were designed into the landscape as parkland features, have in places been retained. These views create surprise historical markers within the landscape and would be sensitive to unsympathetic woodland management. (sic)

The woodland blocks create an important focus to the landscape, particularly where views are across arable fields to the woodland blocks on the skyline.

The landscape strategy for this area is to ‘conserve the remote, open sparsely settled character’.

E6 – North Pickenham Plateau – Perceptual/Visual

Opportunities are created for extensive and panoramic views across the plateau due to the openness of the landscape, and intervisibility with other landscape character areas is high.

E6 – North Pickenham Plateau – Visual Sensitivities

The key visual sensitivities of this landscape relate to its elevated position and gently domed plateau landform. The landscape is exposed, due to its scale and comparatively sparse land cover. There is high intervisibility between settlements and between this and other character areas, with church towers forming a prominent element in views. Overhead power lines also form a prominent element in views, as do the wind turbines adjacent to Swaffham and the turbines and mast tower at North Pickenham.

While the Council acknowledges the ecological benefits of restoring these hedgerows and, should the development come forward, would welcome the screening function they would provide, it considers, nonetheless, that the loss of these open, panoramic views which characterise the area, has not been fully accounted for and thus the effects have been underplayed.

Viewpoint Group 4

VRG 4 has been updated to include a new viewpoint (No 17) on PRow Sporle and Palgrave BR2, Hungry Hill. The effect previously recorded for VRG4 was *moderate-slight* in the long term (as a result of a low-negligible magnitude of impact). The notes on the Viewpoint 17 photograph record a *medium-small* scale of effect in the Short, Medium and Long term. In the absence of updated tables, the Council seeks clarification of the recorded results for this Viewpoint Group.

ExQ2 Q11.0.9 – Control of light

Question

(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.

Response

The Council has consulted its Environmental Health Officer in relation to the revised oOEMP and oCEMP and is content, subject to the detailed lighting assessment and sensitive lighting strategy being secured through the final CEMP and OEMP.

ExQ2 Q11.0.10 – Glint and glare assessment

Question

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.

Response

The Council has consulted its Environmental Health Officer in relation to the applicant's response to ExQ1 Q11.0.5 [REP1-069]:

i) lack of site survey

In relation to the lack of a site survey, whilst the Council maintains that a site survey would represent a more robust method of assessment, the Applicant's response is accepted on the basis that the Street View imagery relied upon is up to date.

ii) concern regarding cumulative impacts

In relation to cumulative impacts, dwelling receptor 20 is the only property identified as falling within the cumulative effects area. Whilst the Council notes that the effects would not be observed at the same time and from the same windows, the resident may potentially be affected more frequently and from more areas of their home. The Council therefore welcomes the proposal for further work on panel configurations to complete geometric modelling of the impacts.

iii) complaints procedure

Given the lack of site survey discussed in ExQ1 Q11.0.5, part i), and the fact that residual effects have not been entirely ruled out for aforementioned dwelling receptor

20 (Q11.0.5, part ii), the Council strongly considers that a glint and glare complaints procedure must be secured.

13.0 Noise and Vibration

ExQ2 Q13.0.1 – Cumulative noise levels at The Off Barn

Question

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.

Response

The Council has consulted its Environmental Health Officer in relation to the updated oCEMP and is satisfied with the update as referenced in the question.

3.0 Closing Statement

- 3.1 The Council remains committed to ongoing engagement with the Applicant, statutory consultees and other interested parties throughout the Examination process.
- 3.2 The Council will continue to progress matters through the Statements of Common Ground and respond to further questions from the Examining Authority when required.