

Application by The Drovers Solar Farm Limited for The Drovers 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:

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'.



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)		



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.



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ExQ2	Question to:	Question:
Compulsory acquisition, temporary possession and other land or rights considerations		
Q5.0.3	The applicant - Part (i) Norfolk County Council – Part (ii)	Possible impediments 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): 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? 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?
	NCC Response:	NCC is not aware of any additional land rights which would be required in addition to those already being sought, though the applicant should satisfy themselves that all land required for accesses and any other highway improvements are either within the order limits (and subject to CA) or within public highway land, so the undertaker would have powers to construct works within it under article 10(2) of the draft DCO [REP2-004]. NCC is not presently aware of any impediments which would impair the ability of the development to become operational.
Q5.0.4	National Highways Norfolk County Council	Highway land and interests 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. Are NCC and NH in their role as the Highway Authorities aware of: Any reasonable alternatives to the Compulsory Acquisition (CA) or Temporary Possession (TP) sought by the applicant; and/or Any areas of land or rights sought by the applicant that they consider would not be needed.
	NCC Response:	Following provision to NCC of a GIS dataset by the applicant, NCC has established that we have a freehold interest in very little of the land for which NCC has been identified as having a land interest in the Book of Reference. Those parcels for which we do have an interest are: 4-46, 5-47, 5-49, 5-54 and 5-55. NCC does not have an interest in any other land. In general, the land identified is associated with public highways (including Public Rights of Way (PRoWs)), but NCC does not need to have an interest in the land to operate the highway and PRoWs because our operation of the public highway is on a statutory footing. We suggest that where land is within the public highway, the applicant likewise will not need to obtain an interest in land forming the public highway because it can rely on powers sought in the article 10(2) of the draft DCO.
Cultural Heritage and archaeology		
Q6.0.2	Norfolk County Council	Pre-construction archaeological mitigation in PV panel areas 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.
	NCC Response:	NCC is content with the applicant response on this and have no further comments to make.
Draft Development Consent Order (DCO)		
Part 3 - Streets		
Q7.2.2	Norfolk County Council	Article 10 - Power to alter layout, etc., of streets 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.

ExQ2	Question to:	Question:
	NCC Response:	Certain statutory undertakers are occasionally granted temporary or permanent powers through specific Development Consent Orders (DCOs) to alter street layouts to accommodate major infrastructure projects. This would have to be done under agreement with the Highway Authority though, as NCC could end up with the maintenance responsibility. I do not envisage major highway alterations required in this instance, other than some improvement to access. This would only apply if Statutory Undertaker is granted to the applicant under the DCO.
Schedule 2 - Requirements		
Q7.4.3	Breckland District Council – Part (i) Norfolk County Council as the Lead Local Flood Authority (LLFA) – Part (ii)	R11 – Surface and foul water drainage 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? 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]?
	NCC Response:	In response to (ii) NCC as the LLFA comments that the drainage strategy is the main mitigation approach to managing the surface water flood risk from the proposed development to the development and elsewhere. The drainage strategy is necessary to support the assessment of flood risk to demonstrate there is no increase in flood risk onsite or elsewhere. At present, the drainage strategy is not able to confirm where the proposed surface water drainage system would discharge due to a lack of information about the site conditions and it is not possible to determine whether the drainage is viable at this time. Therefore currently, it is not possible for the flood risk assessment to confirm that there is no increase in flood risk. Furthermore, the NCC notes that R11 of REP1-004 (dated June 2026, Rev 1) does not reference the NCC as a consultee. As the Environment Agency and Anglian Water do not hold the responsibility of statutory consultee on surface water flood risk or the management of local flood risk associated with surface water flooding, they are not the appropriate bodies to comment on surface water flood risk and its management. Therefore, to ensure consistency with the national and local planning policies, the LLFA require that R11 includes reference to the NCC as a consultee. Finally, NCC notes that there is no mention of the different phases of the proposed development in relation to the drainage system. At present, the current wording would require both the construction and operation phase drainage design is required prior to any site enabling works could begin. This approach is likely to delay the construction phase from starting as at present, the applicant is proposing to delay the data collection that the design is based upon until they have consent (should it be obtained). The data collection to inform the proposed drainage design could take between 3-12 months. This links back to the original point the NCC makes in this response, relating to a lack of site specific information to base the preliminary or detailed drainage design upon.
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.
	NCC Response:	NCC accepts the applicant's explanation regarding the above.
Flood risk, hydrology and water resources		
Q8.0.3	Norfolk County Council as the Lead Local Flood Authority (LLFA)	Surface water runoff from impermeable areas during operation 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. 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?

ExQ2	Question to:	Question:
	NCC Response:	A present, the filter drains, drainage ditches and swales are undefined in size. The applicant has undertaken some initial infiltration testing, although this is only in the area of the BESS and Substation platforms. These infiltration tests are not in the approximate locations of the where the access tracks are to be located. The applicant has undertaken preliminary calculations in the FRA for the sizing the attenuation basin that serves the BESS and / or National Grid Substation (although the calculations are not clear on which area is associated to which works). There are no preliminary calculations for a typical arrangement of operational access track. Therefore, it is not possible to determine where infiltration is viable across the whole site or where the alternative discharge location (Plan B) from these features is. The minimum requirements for FRAs are outlined in paragraph 5.8.15 of NPS EN-1, which clearly states that applicants should "Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates" and "Set out proposals for managing and discharging surface water from the Site using sustainable drainage systems and accounting for the predicted impacts of climate change." At present, the FRA and the proposed works descriptions are not clear on this and therefore, it is difficult for the scheme to include a suitable and consistent provision based upon this information. NCC as the LLFA, requests that some further evidence is provided to demonstrate the viability of the proposed approach as there is a gap in the preliminary design on this matter.
Q8.0.4	Norfolk County Council as the LLFA - Part (i) The applicant - Part (ii)	Ordinary watercourse land drainage consent 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. 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? 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?
	NCC Response:	In response to (i) while the applicant has provided a preliminary drawing [APP-115] that depicts some ephemeral watercourses but not all the watercourses. NCC (as the LLFA) notes that ephemeral watercourses are not wet all year round, however, this does not mean they are not connected to the wider watercourse network. In relation to the ephemeral watercourses, the applicant has not provided evidence to demonstrate that a watercourse tracing investigation has been undertaken. There are no photos and no evidence of ongoing monitoring of the watercourses provided. It has not been determined where these ephemeral watercourses discharge to. These watercourses are in the vicinity of existing ponds, and it is not clear if these watercourses are hydraulically connected to the ponds. Furthermore, NCC notes that the applicant has undertaken modelling on an ordinary watercourse near the A1065 and the Southacre Road that is within the order limits and is shown to connect to the River Nar. This confirms that ordinary watercourses are within the site area, and therefore, the Land Drainage Act would apply to even in the event that sufficient evidence is able to confirm that other watercourses on site are not connected to the wider network. NCC notes the Environment Agency fluvial modelling covers both main rivers and ordinary watercourses that flow into the main rivers. In addition, many ordinary watercourses continue to appear in the surface water flood mapping as surface water flow routes. The applicant's proposed disapplication of the Land Drainage Act appears to be a premature and disproportionate approach when the applicant has not undertaken sufficient investigation and design development at this time to adequately define the works proposed and their location. It should be noted that if there is no need for works in a watercourse, then there would be no requirement for an application under the Land Drainage Act. NCC encourages applicants to discuss their potential in-channel works with our consenting officers to determine whether a consent is required. Therefore at this time, there is not enough evidence for the disapplication of the Land Drainage Act as it is shown to be a relevant consideration to the proposed development. Further work and information is required from the applicant.

ExQ2	Question to:	Question:
Q8.0.6	Norfolk County Council as the LLFA	Pluvial modelling acceptance 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: 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? 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?
	NCC Response:	NCC, as the LLFA, confirms that the applicant has modelled a watercourse (a stream) using a surface water model rather than in a fluvial model. At the time, the applicant had not included any information about the culvert under the road in the model and were assessing the watercourse in the same manner as overland flow. In relation to the policies, this model would provide the evidence base for the assessment of the consequences of flood risk and the impact that climate change could have directly and indirectly to the site and elsewhere once the proposed development is in place (Policy 4.10.8) such as on the adjacent public highway. The approach of using a surface water model for assessing fluvial flood risk is not a typical one used in industry (Policy 4.10.9). In relation to policy 4.10.10, the applicant has applied climate change to the pluvial model of the watercourse, however, the climate change allowances vary between surface water modelling and fluvial modelling as defined in The Climate Change Allowances for Flood Risk Assessments guidance. At present, with the limitations of the model, it is difficult for the applicant to demonstrate that "that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes" in accordance with policy 4.10.11. It is also not clear where along this watercourse, the surface water runoff from the proposed development BESS and Substations will discharge and at what rates as this information is not available at this time. Therefore, it is not possible for it to be included in the hydraulic model (relates back to policy 4.10.8 and 4.10.10). Consequently, it is difficult for the applicant to demonstrate accordance with relevant policies after 4.10.11 but also in relation to the Environmental Statement policy 4.3.4 and some of the subsequent policies as the evidence base is limited on this matter. NCC notes that pluvial is the technical term for surface water. In relation to the surface water modelling undertaken by the applicant in comparison to the Environment Agency's surface water modelling. It should be noted that the Environment Agency's Surface Water flood map identifies topographic low areas that surface water would flow along, which is an approximate location that agricultural field ditches and ordinary watercourses would be aligned with due to physical geography. The applicant has undertaken a pluvial (surface water) model as the Environment Agency's surface water modelling is only suitable at a strategic level and not for a site specific flood risk assessment, due to the lack on site details such as topographic survey and / or watercourse channel survey cross sections, condition of the flowpath/watercourse channel, variability in hydrological approaches and better understanding of various other site parameters such as structures (like existing culverts) in the watercourse. The applicant initially undertook this work as a preliminary comparison exercise. However, NCC notes the applicant has prepared a surface water model rather than a watercourse model for the ordinary watercourse near the A1065 and the Southacre Road that is within the order limits and is shown to connect to the River Nar.
Land and soil		
Q.10.0.3	Breckland District Council Norfolk County Council	Decommissioning of underground cables 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.
	NCC Response:	NCC would prefer to see the buried cables removed in order to minimise any risk of contamination to habitats, soils and groundwater, although it accepts that removal of any ducting has the potential to give rise to extensive ground and habitat disturbance. It would therefore agree that an environmental risk assessment should be carried out and that the Best Practicable Environmental Option (BPEO) should be implemented.

ExQ2	Question to:	Question:
Landscape and visual		
Q11.0.06	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?
	NCC Response:	Yes, NCC considers that it meets objectives of the NPS, but is concerned that the mitigation works proposed as set out in the Statement of Common Ground will work effectively. As NCC remains of the view that the scale of the panels and infrastructure will be very difficult to mitigate. Whilst the applicant's comments that they are presenting the worst case scenario suggests things may not be as bad, without information on the actual final design NCC has to assume the worst case scenario.
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.
	NCC Response:	NCC defers to BDC given that they have raised this comment.
Q11.0.9	Norfolk County Council Breckland District Council	Control of light 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. 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.
	NCC Response:	NCC is content with the updates.
Need, site selection and alternatives		
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] .
	NCC Response:	NCC confirms that NCC56-58 NFRS considers that the required information has been provided and awaits the consultation stated in the oBSMP [APP-194] in respect to further detail and operational response plans.