

The Drovers Solar Farm

Applicant's Response to Written Representations and other Deadline 2 Submissions

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1. Introduction

1.1. Purpose of the Document

- 1.1.1. This document has been prepared on behalf of The Drovers Solar Farm Limited (the Applicant) in relation to an application (the DCO Application) for a Development Consent Order (DCO) to be made to the Secretary of State (SoS) to construct, operate and maintain, and decommission The Drovers Solar Farm (the Scheme), pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2. This document provides the Applicant's response to the Written Representations (WRs) submitted to the Examining Authority (the ExA) at Deadline 2 of the Examination of the DCO Application.
- 1.1.3. A total of 15 WRs and other documents were submitted at Deadline 2 by Interested Parties. This total includes the submission made by Francis Fitzpatrick [\[AS-065\]](#) which was accepted at the discretion of the Examining Authority at Deadline 2. All submissions were published on the Planning Inspectorate's website by 23 June 2026.
- 1.1.4. Where paragraphs or sections of the above submissions have not been included, this has been done where the Applicant does not have any commentary to make on the text provided. This is done only for passages where submissions refer to factual statements, make repetition of text from the Applicant's documents, or where there is direct quoting of local policy or guidance to which the Applicant has already responded to within the DCO Application documents.

1.2. Structure and Scope of the Report

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



Table 1-1: Table of Parties submitting WRs and other Deadline 2 submissions, as organised by the sections of this document

WR or other Deadline 2 submission reference	Responded to in this document?	Reason
Section 2		
Borough Council of Kings Lynn and West Norfolk (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-030]	Yes	The Applicant wishes to respond to points made in this submission.
Castle Acre Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-031]	No	This submission is made together with [REP2-033] . It does not contain any further information to [REP2-033] and so the Applicant does not have any comments to make on this submission.
Castle Acre Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-032]	No	This submission is made together with [REP2-038] , which the Applicant is taking account of separately to this document. The Applicant, therefore, does not have any comments to make on this submission.
Castle Acre Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-033]	Yes	The Applicant wishes to respond to points made in this submission.
Castle Acre Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-034]	No	This submission makes comment in relation to the Draft Itinerary for an Accompanied Site Inspection [APP/8.10.1] . The Applicant has updated the Draft Itinerary for an Accompanied Site Inspection [APP/8.10.1] at Deadline 3 to take account of these comments directly and so no comments are made on this submission within this document.



Norfolk County Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-037]	Yes	The Applicant wishes to respond to points made in this submission.
Sporle with Palgrave Parish Council (Comments for Deadline 2 Draft itinerary ASI) [REP2-038]	No	This submission makes comment in relation to the Draft Itinerary for an Accompanied Site Inspection [APP/8.10.1] . The Applicant has updated the Draft Itinerary for an Accompanied Site Inspection [APP/8.10.1] at Deadline 3 to take account of these comments directly and so no comments are made on this submission within this document.
Sporle with Palgrave Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-039]	Yes	The Applicant wishes to respond to points made in this submission.
Sporle with Palgrave Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2 – Traffic) [REP2-040]	Yes	The Applicant wishes to respond to points made in this submission.
Sporle with Palgrave Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-041]	No	This submission requests attendance at the Site inspection. The Applicant does not have any comments to make on this submission.
Section 3		
Environment Agency (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-035]	Yes	The Applicant wishes to respond to points made in this submission.
National Highways Limited (Comments on the Deadline 1 submissions and any other information requested by the	Yes	The Applicant wishes to respond to points made in this submission.



ExA for Deadline 2) [REP2-036]		
Section 4		
Antony Morgan (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-042]	Yes	The Applicant wishes to respond to points made in this submission.
Mark Holmes (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-043]	Yes	The Applicant wishes to respond to points made in this submission.
Francis Fitzpatrick (Additional Submission accepted at the discretion of the Examining Authority) [AS-065]	Yes	The Applicant wishes to respond to points made in this submission.



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

Reference	Comments	Applicant's Response
Norfolk County Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-037]		
NCC1	Throughout the Submission [The Applicant notes that NCC has not yet had sufficient time to review the Applicant's additional submissions in relation to: • 4. Impacts of the Proposed Project – Strategic Comments • 5. Landscape and Visual • 6. Ecology and Biodiversity • 9. Water Resources (including Flood Risk) • 11. Health and Wellbeing • 12. Arboriculture The Applicant notes that NCC have provided comments on those other matters within the submission but reserve the right to make additional comments on those matters]	The Applicant recognises the short time period between Deadline 1 and Deadline 2 and appreciate the concerns of Norfolk County Council. It is noted that further comments may be forthcoming, and the Applicant will respond to these accordingly once available.
NCC2	Page 5, Paras. 3.1 and 3.2 The updated Examination Library shows that 108 additional or amended documents were submitted at Deadline 1, of which 73 were submitted by the Applicant, The Drovers Solar Farm Limited, with a number of these extended to more than 100 pages. In light of this County Council, considers that the Deadline 2 submission date has provided a wholly inadequate period of time within which to review and provide comments on the additional submissions, and particularly those from the Applicant. During that period (eighteen days), the County Council has had to make a submission or prepare substantive responses of two other concurrent DCO applications, East Pye Solar (EN0110014) and Eastern Green Link 3 and Eastern Green Link 4 (EN0210003). In the circumstances the County Council wishes to make clear that it considers that the time allowed for Deadline submissions in relation to the comments on The Drovers Solar Farm Deadline 1 submission, has been inadequate and prejudicial to the County Council and other parties. The county has not been able to fully review, consider and prepare full response to the Deadline 2 submissions. Accordingly, the following submission sets out only a limited set of comments from the County Council, and it reserves the right to make additional comments at a later stage. Comments are set out in order listed in the County Council's Local Impact Report ("LIR").	The Applicant recognises the short time period between Deadline 1 and Deadline 2. The Applicant requested an extension of Deadline 2 from 16 to 19 June 2026 (see Procedural Deadline A Cover Letter [PDA-001] dated 22 April 2026) given the volume of submissions typically expected at Deadline 1. However, the Applicant recognises that this was still a short timeframe and appreciate the concerns of Norfolk County Council. It is noted that further comments may be forthcoming, and the Applicant will respond to these accordingly once available.



Reference	Comments	Applicant's Response
NCC3	Pages 5 and 6, Para. 5.2 <i>Landscape and Visual</i> It remains concerned that it will not be possible to mitigate much of the landscape impact and it agrees comments received about the visualisations, that providing dotted lines on a photograph does not adequately represent the impact.	Whilst it is not possible to entirely remove the impacts on landscape character through visibility or the appearance of the proposed Solar PV arrays, the effects can be reduced over time through the embedded mitigation measures. The majority of solar developments will result in some residual landscape and visual effects once the embedded mitigation measures have established and this is to be expected for virtually any greenfield ground mounted solar PV development. The embedded mitigation measures are outlined in paragraph 6.7.22 of ES Chapter 6: Landscape and Visual [AS-016]. Whilst there would be a change in the character and appearance of the Site itself, the majority of the physical landscape features would be retained and enhanced through the implementation of the outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11.2]. Photowire visualisations have been provided based upon the Scheme parameters in both the winter and summer months to inform the findings of ES Chapter 6: Landscape and Visual [AS-016]. These include: • ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [AS-023] [AS-025] [AS-027] [AS-029]; and • ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031] [AS-033] [AS-035] [AS-037]. These photowire visualisations show the Scheme parameters as an overall massing model to indicate the 'worst case scenario' in accordance with the adopted (and standard practice) Rochdale envelope principles. In addition, illustrative photomontages have been provided to show the design principles and initial design concepts as photorealistic montages. These include: • ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [APP/6.3.2]; and • ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045] [AS-047] [AS-049]. Furthermore, additional illustrative photomontages have been provided within Appendix 4 of the Technical Information Note – Landscape and Visual [APP/8.18] at Deadline 3, as requested by Breckland Council and include ES Figure 6.17: Additional Summer Photomontages: Illustrative Scheme which is contained within Technical Information Note – Landscape and Visual [APP/8.18]. The photowire visualisations showing the Scheme parameters are considered to adequately represent the 'worst case scenario' in terms of the maximum visual impacts to inform the findings of ES Chapter 6: Landscape and Visual [AS-016].
NCC4	Page 6, Paras. 8.1 and 8.2 <i>Traffic and Transport</i> The County Council has, given the limited time available, the following detailed comments at this stage: In relation to the outline Construction Traffic Management Plan [REP1-052], Figure 2.1 Access points I (River Road) and H (Fincham Drove) the County Council requests that clarification be provided as to whether these are a crossing to get to the Western extents of the scheme, or will they provide a primary access point as indicated in T2.1, like A/B/C.	The Applicant has updated the outline Construction Traffic Management Plan (oCTMP) [APP/7.7.2] at Deadline 3 to explicitly confirm that the access points I (River Road) and H (Fincham Drove) will not be used as primary access points, with these access points instead only being served by the internal routes. Only access points A, B and C (located on the A1065) will be used as the primary access points, with all vehicles required to access the Site via the A1065. The routing for HGVs is secured within the oCTMP [APP/7.7.2].
NCC5	Page 6, Para. 8.3 <i>Traffic and Transport</i> In relation to Figure 4.1, while the description states that Route C is not to be used by Heavy Goods Vehicles ("HGVs"), requests	The Applicant has updated the oCTMP [APP/7.7.2] at Deadline 3 to remove any reference to vehicle routing associated with Route C, at the request of NCC, confirming that vehicles will only utilise Route A and Route B. Figure 4-1 of the oCTMP [APP/7.7.2] has been updated to confirm the routing for vehicles.



Reference	Comments	Applicant's Response
	that clarification be provided about it is proposed that Light Good Vehicles ("LGVs") will use this route? If so, could anticipated traffic numbers be provided to allow assessment. If all construction traffic is intended to use the main access points on the A1065, it would it is recommended that Route C be removed from the proposals.	
NCC6	Page 6, Para. 8.4 <i>Traffic and Transport</i> Paragraph 5.2.1 states that "Highway Condition Surveys will be carried out on the relevant roads proposed for construction access prior to commencement of construction". However the County Council notes that no methodology for highway surveys has been provided.	The methodology for the condition surveys would be confirmed by the contractor as part of the detailed Construction Traffic Management Plan that is provided under a discharge of the relevant requirement of the DCO; however, for completeness, the oCTMP [APP/7.7.2] has been updated at Deadline 3 to include the methodology for the condition surveys which will include taking photographic evidence of all highway verges, footways, carriageways and street furniture along the length of the access routes from the A47 along the A1065 to the Scheme's access points. From each access point onto the A1065, the condition surveys would extend 50m in both directions. The condition survey would also capture 30m either side of the proposed internal access points. In accordance with Requirement 15(3) of Schedule 2 of the draft Development Consent Order (DCO) [APP/3.1.3], the relevant planning authority must consult with the relevant highway authority before approving the detailed Construction Traffic Management Plan (which, per the text above, will include the methodology for the condition surveys). The Applicant would then undertake (at cost) any remedial measures required to reinstate the highway to the same condition as prior to any construction of the Scheme taking place.
NCC7	Page 6, Para. 8.5 <i>Traffic and Transport</i> Paragraph 5.3.6 states "It is noted that during construction of the overhead line works, there may be a need to temporarily close Petticoat Drove, meaning the existing property at Finger Hill Lodge would need to temporarily utilise Washpit Drove for access. However, Washpit Drove is not proposed to be utilised by construction vehicles and will only temporarily be a diversion route for the Finger Hill Lodge residents when the overhead lines works are being undertaken". The County Council is concerned that Washpit Drove is a Bridleway (South Acre RB1) and therefore more detail on the diversion route is required and the mitigation for users of this route.	The temporary use of Washpit Drove by the Finger Hill Lodge residents would only take place over a short period (such as a period of one to two weeks) whilst the overhead line works are undertaken and would be managed by way of banksmen to ensure there is no conflict with users of the Bridleway, with banksmen positioned along the PRoW to help manage access. Given it is only single property that is being diverted to use Washpit Drove (which already has an established right of vehicle access from another property along it), it is not considered that this level of traffic would lead to any adverse impacts over the short temporary period that they may be required. More information on the programme and implications of the works would be provided as part of the detailed Construction Traffic Management Plan once the required works are confirmed by the contractor, as secured through the oCTMP [APP/7.7.2]. Additional mitigation measures to mitigate conflicts with the users of the PRoW network are secured through the outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP-192].
NCC8	Pages 6 and 7, Para. 8.6 <i>Traffic and Transport</i> In relation to outline Operational Traffic Management Plan (Clean) [REP1-056], Figure 2.1 Figure 2.1 Access points I (River Road) and H (Fincham Drove) the County Council requests that clarification be provided as to whether these are a crossing to get to the Western extents of the scheme, or will they provide a primary access point as indicated in T2.1, like A/B/C (i.e. the same comment as is set out above in relation to the outline Construction Traffic Management Plan [REP1-052], Figure 2.1).	The Applicant has updated the outline Operational Traffic Management Plan (oOTMP) [APP/7.9.2] to explicitly confirm that the access points I (River Road) and H (Fincham Drove) will not be used as primary access points, with these access points instead only being served by the internal routes. Only access points A, B and C (located on the A1065) will be used as the primary access points, with all vehicles required to access via the A1065. The routing for HGVs is secured within the oOTMP [APP/7.9.2].
NCC9	Page 7, Para. 8.7 <i>Traffic and Transport</i> In relation to Figure 4.1, while the description states that Route C is not to be used by HGVs, requests that clarification be provided	The Applicant refers to its response to NCC5 above.



Reference	Comments	Applicant's Response
	about it is proposed that LGVs will use this route? If so, could anticipated traffic numbers be provided to allow assessment. If all construction traffic is intended to use the main access points on the A1065, it would it is recommended that Route C be removed from the proposals i.e. the same comment as is set out above in relation to the outline Construction Traffic Management Plan [REP1-052], Figure 4.1).	
NCC10	Page 7, Paras. 8.7 and 8.8 <i>Traffic and Transport</i> Paragraph 5.6.1 states "Temporary road signage will be installed along the replacement traffic routes to inform all road users of the replacement works and to direct replacement traffic to and from the various replacement accesses. The same comment in relation to Route C (as is set out in paragraphs 9.3 and 9.7 above), applies. The County Council's reserves the right to make additional comments in relation to the new and updated traffic and transport related submissions.	The Applicant confirms that signage will be erected at the access routes along the A1065 to advise drivers and construction staff of the access locations on the A1065, during the construction phase and operational phase (e.g. replacement activities), details of which are secured through the oCTMP [APP/7.7.2] and oOTMP [APP/7.9.2] respectively. The Applicant confirms that no traffic will route via Route C, as included in the updated oCTMP [APP/7.7.2] and oOTMP [APP/7.9.2] which has all reference to Route C removed. The Applicant welcomes further engagement with Norfolk County Council throughout the examination process.
NCC11	Page 7, Para. 10.1 <i>Socio-economics, Recreation and Tourism</i> It is noted that the Drove Solar Farm's Deadline 1 submissions, in respect of employment and skills, include no substantive changes and the Council's position as set out in the Local Impact Report remains unchanged. Norfolk County Council welcomes the inclusion of the Outline Employment and Skills Plan and the requirement for a full Employment, Skills and Supply Chain Strategy ("ESSCS"), approved by Norfolk County Council, prior to commencement. The full Employment and Skills Plan will be produced in consultation with the County Council's Skills and Employment Team.	The Applicant welcomes this comment.
Borough Council of Kings Lynn and West Norfolk (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-030]		
KLWN1	Page 1, Row 1 [5.8.1 - Design Principles, Parameters and Commitments, Tables 3-2, 3-3 and 3-4. Comments on raising floor levels] The Borough Council suggest that flood modelling results and associated raising of floor levels of this key infrastructure has the potential to increase impacts and this should be carefully considered given the landscape implications raised by the LPA.	The Design Principles, Parameters and Commitments [APP/5.8.3] has been updated at Deadline 3 to commit to not place BESS units within the modelled pluvial flow pathways. As such, raising of floor levels is not necessary and there would be no increase in landscape impacts.
KLWN2	Page 1, Row 2 [5.22 SOCG with Defence Infrastructure Organisation, Reference 1-3, 1-4, 1-5. Comments on MOD concerns]	The Applicant is continuing to engage with the MOD in relation to Glint and Glare and other issues. The Applicant is close to reaching an agreed position with the MOD regarding the requirement for a Glint and Glare Management Plan and is currently awaiting the MOD's latest response.



Reference	Comments	Applicant's Response
	The Borough Council support the views of the DIO/MOD and await, in particular, confirmation as to whether a Glint and Glare Management Plan is necessary given the concerns raised.	
KLWN3	Page 1, Row 3 and Page 2, Row 1 [6.2.1 – ES Chapter 17 In-Combination Effects, Table 17-3. Table update to remove erroneously reported significant adverse impacts] The Borough Council note the removal of the impacts from the table, understood to be due to a typographical error. The Council are aware of the intention to retain the substation infrastructure post-decommissioning and whilst this may not result in significant adverse effects in EIA terms, it is of note. The visual impact of the substation, retained without the clear association with the PV arrays and other infrastructure will result in the built form being entirely out of context. The substation infrastructure will remain at odds with the landscape setting and intensely rural character in perpetuity.	The Applicant considers that electricity substations are often found in rural locations, either in isolation or co-located with other forms of renewable development such solar arrays, wind turbines or BESS or in isolation alongside associated overhead lines. The Scheme proposes to co-locate the Customer Substation, National Grid Substation, BESS, PV Arrays and other infrastructure to limit the landscape and visual effects during the operational phase. The co-location of renewables infrastructure is encouraged under paragraph 2.5.2 of NPS EN-3 (2023), which states: <i>“Proposals for renewable energy infrastructure should demonstrate <u>good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses...</u>” (our emphasis)</i> Paragraph 2.10.10 of NPS EN-3 (2023) also notes that: <i>“...government is <u>supportive of solar that is “co-located” with other functions</u> (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use.” (our emphasis)</i> After the operation phase of the Scheme, the proposed Solar PV arrays would be dismantled and removed from the Order limits. The National Grid Substation and Grid Connection Infrastructure and associated development platforms would remain in place. The landscape and visual effects associated with the National Grid Substation in isolation would, therefore, remain post decommissioning.
KLWN4	Page 2, Row 4 [7.6.1 outline Construction Environmental Management Plan, 4.7 – Soils and Agriculture. Addition of additional measures text with regard for contamination] The Borough Council note and support the addition of text regarding a watching brief throughout the construction phase to monitor for any unexpected contamination, and a Discovery Strategy the details of which will be confirmed in the detailed CEMP. The proposals for an unexpected contamination protocol to be provided in the detailed CEMP are also supported.	The Applicant welcomes this comment.
KLWN5	Page 2, Row 4 and Page 3, Row 1 [7.7.1 – outline Construction Traffic Management Plan, Paragraph 1.3.4 (and Appendix 1 of that document). Noting of the addition of a travel plan to the oCTMP] Inclusion of the travel plan as an appendix is more in keeping with Policy EN-1 Section 5.14.8 that refers to a vision-led travel plan being adopted. It is encouraging to see that hard measures such as a shuttle bus service to consolidate movements and a restriction on the number of construction parking spaces, these are in addition to the typical soft measures of travel plans.	The Applicant makes note of the comment and has committed to investigating the use of electric vehicles for the shuttle service with the appointed contractor at the tender stage, which will be confirmed within the detailed Construction Traffic Management Plan that is submitted to discharge the corresponding DCO requirement. The Travel Plan at Appendix 1 of the oCTMP [APP/7.7.2] has been updated at Deadline 3 to include this commitment.



Reference	Comments	Applicant's Response
	In terms of the shuttle bus, the Applicant refers to conveying staff from construction compounds as well as investigating the feasibility of a shuttle service from staff accommodation and local transport hubs or rail stations (subject to employment strategy). This could mean the shuttle bus extends into outlying settlements including those within this Council's area. In line with Section 5.2.3 of EN-1 and Defra's Interim Planning Guidance on PM2.5 that refers to ensuring only the minimum amounts of pollutants being emitted, the Borough Council would recommend that consideration is given to shuttle bus trips being made via electric vehicles.	
KLWN6	Page 3, Row 2 [7.7.1 – outline Construction Traffic Management Plan, Paragraph 4.1.3. Note that Route C will not facilitate any construction vehicles] It is noted Part of Route C is within BCKLWN area. The Borough Council have no objection to this change.	The Applicant welcomes this comment.
KLWN7	Page 3, Row 3 and Page 4, Row 1 [7.11.1 outline Landscape and Ecological Management Plan. Comment noting updates to this document, such as added reference to the adopted Norfolk LNRS] The Borough Council notes the changes however require more time to review this information and how this relates to the views of Natural England and other technical consultees and intend to submit an update at a future deadline.	The Applicant notes that the Borough Council requires more time to review the information, and the Applicant will therefore respond accordingly once their comments are available.
KLWN8	Page 4, Row 2 [8.4 Applicant's Response to Relevant Representations, BCKLWN45 – BCKLWN49. Comments noting amends have been made to Chapter 9 of the ES to include actual change in vehicle numbers] The Borough Council have no objection to this.	The Applicant welcomes this comment.
KLWN9	Page 4, Row 3 [Natural England's Response to ExQ2, Q3.0.1, Q3.0.2 and Q3.0.8. Comments on Stone Curlews, livestock management and the relocation of BESS and the Substation] The Borough Council note the comments from Natural England and await the Applicant's response. The Borough Council's initial view in regard to Q3.0.8 of that document is that the relocation of the BESS or Substations could have adverse effects (on landscape and heritage in particular) and that a lighting assessment as suggested by Natural England may	The Applicant notes and agrees with the Borough Council's view that the relocation of the BESS or Substations could have adverse effects, such that a lighting assessment of the BESS and Substation in their current locations (as suggested by Natural England) would appear to represent the appropriate approach in this regard. Accordingly, the Applicant has committed to a undertaking a detailed lighting assessment and a sensitive lighting strategy to be provided within the detailed Construction Environmental Management Plan, as set out within the oCEMP [APP/7/6.3] in line with Natural England's response. The Applicant's responses to ExQ2 and associated comments from Natural England are set out at in Applicant's Response to ExQ2 [APP/8.17], whilst the Applicant's responses to Q3.0.1, Q3.0.2 and Q3.0.8 (ExQ1) are set out in Applicant's Response to ExQ1 [REP1-069].



Reference	Comments	Applicant's Response
	therefore be the more appropriate approach, notwithstanding our previous comments on the implications of lighting submitted as part of our LIR.	
Castle Acre Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-033]		
CAPC1-1	Page 1 [Paragraph 8.6.8 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>"The situation of Castle Acre Castle at this highly defensible elevated position is a key aspect of the strategy behind its intentional design and views illustrating this have remained largely uninterrupted."</i> These view should remain uninterrupted as they are highly significant in terms of the historic landscape.	As stated at paragraph 8.8.37 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] , any visibility of the Scheme from the Castle would form a small part of much wider vistas and would not affect the ability to understand and appreciate the Castle's topographic and strategic importance.
CAPC1-2	Pages 1 and 2 [Paragraph 8.6.9 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>"the castle would still hold a high level of significance if removed from this setting"</i> An ambiguous statement – the castle is not being physically removed from its site but the setting is an intrinsic and holistic part of its location.	The comment on the asset retaining a high level of significance is not ambiguous or downplaying the importance of setting. It is emphasising the fact that when assessing significance of heritage assets, the contribution of setting cannot be taken in isolation, but rather is focussed on what setting adds to the significance of the asset as a whole. This is emphasised by paragraph 5.9.3 of NPS EN-1 (2023) which notes that <i>"a heritage asset's significance derives from the sum of its interests and, therefore, a heritage asset's significance derives both from its physical presence and its setting"</i> . When assessing the significance of each monument as a whole, it is clear that the bulk of that significance is vested in the physical remains which retain a very high level of evidential value and archaeological interest, and that the contribution of setting, although still considerable, is secondary to the physical remains.
CAPC1-3	Page 2 [Paragraph 8.6.10 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>"The Site is situated to the south of Castle Acre Castle and forms part of the largely arable landscape occupying the distant, higher ground to the south of the monument and the village. These agricultural surroundings form part of the wider setting of the monument"</i> This has been an arable landscape as recorded in the Domesday Book 1086, with the 'Acre entry' referencing the Saxon land management. South Acre had land for six ploughs, meadow and woodland while Castle Acre had twelve plough teams, meadow and woodland.	With regard to the meaning of 'acre' and the arable use of the Site, the bulk of the Order limits are unlikely to have been used as arable land in the medieval period but would more likely have formed summer pasture/grazing land. The almost complete lack of medieval artefacts recovered during the trenching (ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160]) suggests that the area was not being intensively manured in the period and was, therefore, unlikely to have formed arable land as it does today. The bulk of the Site is also visually and spatially separated from the heritage assets in the Nar Valley, making little (if any) contribution to their significance.
CAPC1-4	Page 2 [Paragraph 8.6.11 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>"Indeed, views towards the Site from the castle are already scattered with wind turbines, pylons, large silos and pig farms, all of which have had a negligible influence on the castle's significance or ability to appreciate said significance."</i>	As is standard practice, the assessments contained within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are based upon professional judgement in accordance with current guidance on setting assessment. The opinions of local residents and visitors have not been sought in reaching these conclusions. The discussion regarding the turbines, pylons, pig farms etc. are not used to justify the introduction of further such features into the landscape but rather serve to highlight that this is a modern rural landscape and that such landscapes do contain many elements that are distinctly modern.



Reference	Comments	Applicant's Response
	'A negligible influence' is a subjective judgement. Have the opinions of residents and visitors been sought before making this statement? To state that 'views towards the Site from the castle are already scattered with wind turbines, pylons, large silos and pig farms' is not an argument for further intrusive features resulting from the solar farm. Pig farms occupy land temporarily and they are agricultural. The infrastructure of the solar farm is of an unacceptable scale that imposes industrialisation on a rural and historic landscape.	
CAPC1-5	Pages 2 and 3 [Paragraph 8.6.15 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>"The wider landscape surrounding the priory is predominantly agricultural in character, with smaller areas of pasture in the foreground and larger arable fields on the more distant higher ground visible to the east, north and south Views are particularly channelled along an east to west valley in which the priory and village are sited."</i> The significance of the Nar Valley as a medieval pilgrimage route has not been addressed. The Priory at Castle Acre is one of six religious houses sited along the Nar Valley and these were all visited by pilgrims travelling to the medieval shrine at Walsingham, the second most important religious centre, after Canterbury Pilgrims came by ship to King's Lynn; visited the Red Mount Chapel there are then took the route through the Nar Valley, past the chapel dedicated to Thomas a Becket and past South Acre Church, to the e Priory at Castle Acre where they could worship the relic of the arm of St Philip. It is no coincidence that Castle Acre Church is dedicated to St James the Great of Compostella whose shrine was. and still is, one of the most important Catholic pilgrim destinations. The present-day Nar Valley Way is a direct legacy of the medieval pilgrim route.	The Nar Valley Way has been assessed in landscape terms within ES Chapter 6: Landscape and Visual [AS-016], which identified a medium-low impact resulting in a Moderate adverse effect (not-significant). The route itself is not identified as a non-designated heritage asset; however, ES Chapter 8: Cultural Heritage and Archaeology [APP-057] has assessed potential impacts upon the designated heritage assets that lie along the Nar Valley and which have potential to be impacted by the Scheme, including Castle Acre Priory, South Acre Church and St James Church. In each instance, the worst-case impact was identified as Low/Negligible magnitude resulting in a Minor Effect (not significant) for these high-grade designated heritage assets.
CAPC1-6	Page 3 [Paragraph 8.6.17 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>"The visibility of small parts of the Site from the priory merely form a small part of much wider vistas and do not contain any distinguishing features that could be said to add to the significance of the monument."</i> They may not have 'any distinguishing features' adding to the 'significance' but the understated rural nature of the landscape is what contributes to its charm and tranquillity.	As set out in the assessment, the Applicant considers that the views from the Priory will only encompass small elements of the Scheme and will not materially change the views or the ability to appreciate the rural nature of the landscape.



Reference	Comments	Applicant's Response
CAPC1-7	Page 3 [Paragraph 8.6.19 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>“a ... much restored church”</i> The Norfolk Historic Environment Record (NHER 4126) states: Unusually, the church seems largely to have escaped restoration in the 19th century.	This matter does not affect how the Church has been assessed within ES Chapter 8: Cultural Heritage and Archaeology [APP-057], where it is recognised as a Grade I listed building of high sensitivity and national importance. Therefore, the Applicant considers the assessment of this Church to be sound.
CAPC1-8	Pages 3 and 4 [Paragraph 8.6.22 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>“Surrounding the church along the valley to the east and west, and on higher ground to the south is widespread agricultural land mostly comprising broad arable fields.”</i> This land has been arable and pasture since Saxon times. The medieval church was sited in the context of this agricultural landscape which will be destroyed by the solar farm.	There is little visual connectivity between the bulk of the Scheme and the Church of St George, as described in ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] and illustrated in Figure 12 of that document. The Church will, therefore, continue to be experienced as set within an agricultural landscape.
CAPC1-9	Page 4 [Paragraph 8.6.44 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>“Castle Acre is prominent in this landscape and has a clear skyline, particularly of the castle, priory and St James church, visible from this wider reaching rural landscape beyond the village limits.”</i> It is precisely this skyline, especially when approaching along the A1065 from the south, which is a unique feature of Norfolk's and indeed East Anglia's landscape. Additional pylons; the substation and the solar farm itself will negatively intrude upon this skyline as alien infrastructure.	Whilst there is some visibility of Castle Acre from the A1065 adjacent to where the built elements of the Scheme are proposed, this is restricted to glimpsed views from the south, from approximately the 80m AOD contour to the 55m AOD contour. These views lie at a distance of c.3km to 3.75km from Castle Acre and, whilst the settlement, Castle and Church tower can be discerned and the location of the settlement can act as a way marker, the distance is such that it is not possible to truly appreciate the special interest of the assets at this distance. Furthermore, there is no footpath or layby along this stretch of road and the majority of views will therefore be from within moving vehicles. Visibility of Castle Acre effectively disappears from approximately the 50m AOD contour until passing to the north of Bartholomew's Hill. It is only once beyond Bartholomew's Hill, travelling on the A1065, or other parts of the road network, that truly meaningful views of Castle Acre, where the village, Church, Castle and Priory can be seen as an ensemble, are available. These views beyond Bartholomew's Hill are also beyond the built elements of the Scheme and will remain unaltered.
CAPC1-10	Page 4 [Paragraph 8.6.45 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>“However, these views tend to be partial, filtered or oblique.”</i> That these views are not more spectacular should not be seen as a criticism and dismissive of their charm.	Views that are partial, filtered or oblique do not allow for a full understanding and experience of assets and, as such, remain secondary to views in which the special interest of assets can be truly appreciated.
CAPC1-11	Pages 4 and 5 [Paragraphs 8.6.46 to 8.6.49 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are quoted in full] <i>“8.6.47 The level of preservation of historic fabric at the centre of South Acre combined with the very low proportion of modern</i>	The impacts of the Scheme are presented within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets, due to the lack of shared experience between the plateau land and the heritage assets, which is a prerequisite for contribution to significance. Large tracts of agricultural land lie between the Order limits and the assets and the understanding and context of these assets will, therefore, remain to be clearly appreciated.



Reference	Comments	Applicant's Response
	<i>construction has allowed it to retain a great sense of comprehensiveness</i> <i>8.6.48 The historic settlement core, clustered around the Church of St George, is nestled into the valley and, with the numerous matures trees and hedgerows throughout the settlement, sits harmoniously in the landscape</i> <i>8.6.49 This countryside location forms the setting of the village and emphasises its rural, traditional character."</i> These three statements actually support the argument that the area proposed for The Drovers is totally unsuitable, as it would impact negatively on the visual; environmental, agricultural and historic aspects of the landscape.	
CAPC1-12	Page 5 [Paragraph 8.6.60 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>"the Peddars Way, is purported to extend c.1km to the east of the Site on a perpendicular alignment ..."</i> LIDAR imagery (Environment Agency) evidences this alignment: [See image] Dotted parallel white lines centre of image show original route of the Peddars Way.	Whilst it is highly likely that the feature shown on the LiDAR imagery is the Roman road known as the Peddars Way, it has not yet been confirmed by intrusive investigation. The presence, or otherwise, of the Roman road does not affect the conclusions of ES Chapter 8: Cultural Heritage and Archaeology [APP-057].
CAPC1-13	Pages 5 and 6 [Paragraph 8.6.65 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>"The purported date of this feature as Roman has, therefore, been called into question ..."</i> From the Norfolk Heritage Explorer: The Fen Causeway(NHER 2796) is the name given to the Roman road which runs from a junction with Ermine Street and King Street near Peterborough across the Cambridgeshire and Norfolk fens. In Norfolk, the Fen Causeway runs between Upwell and Denver, but in places there is more than one possible route. East of Denver, the road then probably divides into two, with one route heading due east to the Roman town of Venta Icenorum at Caistor St Edmund (NHER 9786) and the other heading northeast towards the Roman town at Brampton (NHER 1006 and 1124). From Fincham eastwards, the route is known as Fincham Drove. As evidence for Fincham Drove being Roman, there is a distinct agger 21 feet wide between small ditches, can be clearly seen continuing the same line diagonally through the corner of Long Plantation. The present main road through Stradsett is on the line of Fincham Drove; the placename 'Stradsett' comes from the Roman 'Strata' a street or routeway.	The geophysical survey ES Appendix 8.4: Geophysical Survey Report [APP-154 - APP-158] and archaeological trenching ES Appendix 8.6 Archaeological Trial Trenching Report [APP-160] within the Order limits have identified enclosures and field systems that do not respect the route of this drove (although there are others that do). Neither the geophysical survey or the aerial photographic and LiDAR survey ES Appendix 8.5: Air Photo Services Report [APP-159] identified any continuation of a former track or road beyond the point at which Fincham Drove turns to the north, where it was expected to cross Fields 26 and 27. Therefore, whilst it is likely that Fincham Drove follows the course of a Roman road, archaeological investigations have raised a number of questions relating to previous assumptions. This does not affect the conclusions of ES Chapter 8: Cultural Heritage and Archaeology [APP-057].



Reference	Comments	Applicant's Response
	[See image] Route of Fincham Drove, west – east crossing of A1065 and beyond. EA LIDAR.	
CAPC1-14	Pages 6 and 7 [Paragraphs 8.8.12, 8.8.13 and 8.8.20 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are quoted in full] <i>“8.8.12 all have the potential to have an adverse, permanent, and irreversible impact upon buried archaeology.</i> <i>8.8.13 The Customer Substation, National Grid Substation, and the BESS will likely result in total destruction of archaeological remains within their footprint.”</i> It is unacceptable in terms of its heritage value that the buried archaeology will be adversely affected. Wilfully destroying evidence of the past is morally wrong and denies present and future generations the opportunity to add to knowledge of our history.	Archaeological remains within the Order limits will not be wilfully destroyed. All impacts upon archaeological remains will be mitigated through further archaeological investigation as detailed within ES Appendix 8.7: outline Archaeological Mitigation Strategy [REP2-016]. Further, in accordance with Requirement 12(3) of Schedule 2 of the draft DCO [APP/3.1.3], the written scheme of investigation (to be submitted to and approved by the relevant planning authority) must be substantially in accordance with the ES Appendix 8.7: outline Archaeological Mitigation Strategy [REP2-016].
CAPC1-15	Page 7 [Paragraph 8.8.23 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>“impacts to buried archaeological features during the operational phase would, therefore the beneficial nature, due to these remains being taken out of the agricultural cycle of regular ploughing”</i> Whilst deep ploughing is still undertaken in Norfolk, the shift is towards reduced tillage (min-till) or direct strip-seeding systems to conserve soil ecology and reduce carbon loss so there is less of a threat to buried archaeological remains. There can be no compensatory measures that mitigate destruction of buried archaeology as stated above 8.8.12. and 8.8.13.	Removing land from tillage is recognised as being beneficial to buried archaeological remains. Below ground impacts upon archaeology will be mitigated through further secured archaeological investigation, as detailed within ES Appendix 8.7: outline Archaeological Mitigation Strategy [REP2-016]. Further, in accordance with Requirement 12(3) of Schedule 2 of the draft DCO [APP/3.1.3], the written scheme of investigation (to be submitted to and approved by the relevant planning authority) must be substantially in accordance with the ES Appendix 8.7: outline Archaeological Mitigation Strategy [REP2-016].
CAPC1-16	Page 7 [Paragraph 8.8.25 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>“it is the impact upon the significance of the asset as a whole (encompassing all of its values and its entire setting) that is assessed ...”</i> It is precisely this impact ‘as a whole’ which is the basis of the objection of CAPC, based on the opinions and comments of residents.	For the reasons set out above, and across its various submissions made into the examination thus far, the Applicant is content that the levels of harm identified within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are robust and justifiable.
CAPC1-17	Pages 7 and 8 [Paragraphs 8.8.35, 8.8.36, 8.8.37 and 8.8.38 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are quoted in full] <i>“8.8.35 Fields 21, 25, 26 and 33 are proposed for solar panels and these will be partially visible from the Castle.</i>	ES Chapter 8: Cultural Heritage and Archaeology [APP-057] has assessed these views in terms of the contribution that they make to the significance of the identified heritage assets. It is a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that does not mean that any harm, however minor, would necessarily require planning permission to be refused. For the reasons set out above, and across its various submissions made into



Reference	Comments	Applicant's Response
	8.8.36 <i>The majority of views will be unchanged, with only very small elements of the wider Scheme (at least partially screened under the proposals) remaining.</i> 8.8.37 <i>There is some visibility of the Site from the Castle, though this is limited (See ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP/6.4], Figure 8) and any visibility of the Scheme from the Castle will form a very small part of a much wider vista."</i> If, as stated, the 'majority' of the views will be unchanged, there is a minority that will be adversely affected and detract from 'the wider vista'. Such intrusion could be reason enough to refuse planning permission.	the examination thus far, the Applicant is content that the levels of harm identified within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are robust and justifiable. Paragraphs 8.3.73 to 8.3.127 of the Planning Statement [REP1-012] and Policy Compliance Document [REP1-014] demonstrate how the Scheme complies with the relevant policies in relation to the historic environment, and no residual significant effects are anticipated, and this is not, therefore, reason enough to refuse the consent of the DCO Application.
CAPC1-18	Page 8 [Paragraph 8.8.40 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>"However, as a grand medieval complex with significant archaeological interest, the priory would still hold a high level of significance if removed from this setting."</i> As with the Castle, an ambiguous statement – the priory is not being physically removed from its site but the setting is an intrinsic and holistic part of its setting.	The Applicant refers to its response to CAPC1-2 above.
CAPC1-19	Pages 8 and 9 [Paragraph 8.8.41 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] is quoted in full] <i>"It is not considered that areas of the Solar PV Site would dominate or intrude into such views but would be visible. Whilst the visibility of Solar PV Arrays would represent a change in the setting of Castle Acre Priory, they would not alter any appreciation of the topographic siting of the monument and the vast majority of any vista from the priory would remain in agricultural use, as such the impact from visible Solar PV Arrays is considered to be negligible."</i> <i>The proposed new pylons will be highly visible from Castle Acre Priory, especially as they punctuate the skyline. Whilst there are already pylons visible in these views, under Scenario A the combined effect of both existing and new pylons will increase their prominence in the landscape, but not to a degree that they may draw the observers eye away from elements that add to the appreciation of the priory's significance."</i> Where is the evidence for public consultation that the impact from the solar arrays and the new pylons would be 'negligible' ? There has been one meeting in Castle Acre for residents (12 June 2025; 1.5 hours) to view the initial plans. CAPC had to request this meeting; it was not proposed by the developers.	As is standard practice, the findings of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are based on professional opinion and follow published guidance on setting assessment. The Applicants notes that there was an additional 'pop-up' event held in Castle Acre on 12 June 2025, arranged in response to concerns raised during the pre-statutory consultation briefing in May 2025 about the absence of an event in this location. The Applicant considers that it has complied with all relevant consultation requirements, including the applicable provisions of the PA2008, as set out in the Consultation Report [APP-025]. The Applicant is satisfied that its consultation approach has been robust and that stakeholders have been provided with appropriate opportunities to comment on the Scheme including those living in or representing Castle Acre.



Reference	Comments	Applicant's Response
CAPC1-20	Pages 9 and 10 [Paragraphs 8.8.66 and 8.8.73 of ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are quoted in full] <i>“the magnitude of impact on Castle Acre Conservation Area, a medium sensitivity receptor, is considered to be negligible... several impacts on designated heritage assets resulting from the operational phase of the Scheme would be reversed ...”</i> Once a historic landscape has been destroyed, it cannot be ‘reversed’. The visual and experiential harm caused by the scale and the infrastructure of the proposed solar farm would be not be ‘temporary’, it will be significant and irreversible, compromising the cultural landscape, the beauty and tranquillity of one of Norfolk's most important heritage clusters.	The Solar PV arrays will be removed during the decommissioning phase. The major elements of the historic landscape (the Drovers themselves, field pattern etc.) will be preserved as detailed in the oCEMP [APP/7.6.3], oOEMP [APP/7.8.3] and outline Decommissioning Strategy (oDS) [APP/7.10.2]. These management plans will ensure that the historic landscape is not ‘destroyed’. For the reasons set out above, and across its various submissions made into the examination thus far, the Applicant is content that the levels of harm identified within ES Chapter 8: Cultural Heritage and Archaeology [APP-057] are robust and justifiable.
Sporle with Palgrave Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-039]		
SPPC1-1	Page 1, Q1.0.1 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.	ES Figure 2.1: Cumulative Schemes - Within 25km [APP/6.3.2] has been updated at Deadline 3 to reflect the cumulative schemes presented in the updated ES Appendix 2.4: Cumulative Schemes [APP/6.4.1], which has also been updated at Deadline 3 to include recently consented developments that meet the cumulative scheme criteria. The additional schemes provided in the updated ES Appendix 2.4: Cumulative Schemes [APP/6.4.1] (and ES Figure 2.1: Cumulative Schemes - Within 25km [APP/6.3.2] and ES Figure 2.2: Cumulative Schemes - Countywide [APP/6.3]) include the JAFA project, as committed by the Applicant during Issue Specific Hearing 1 because of its proximity to the Site. The Shipdham Solar and BESS projects were reviewed by the Applicant, but it did not meet the selection criteria as set out in ES Appendix 2.4: Cumulative Schemes [APP/6.4.1] (and consequently the short list) and therefore is not shown on set out in ES Figure 2.1: Cumulative Schemes - Within 25km [APP/6.3.2].
SPPC1-2	Page 1, Q2.0.2 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.	The Applicant, along with the promoter of High Grove Solar Farm, met with Sporle and Palgrave Parish Council on 7 July 2026. The Applicant advised that the Scheme's cumulative assessment has been based upon publicly available information regarding the construction phase for High Grove. The promoter of High Grove Solar Farm explained that they would be updating their cumulative assessment in the preparation of their DCO submission. The Applicant reiterates 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.
SPPC1-3	Pages 1 and 2, Q10.0.7 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. Sheep grazing under solar arrays is highly promoted by solar developers to alleviate 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.	The Applicant acknowledges the challenges of grazing sheep under solar panels and therefore states under table 3-6 in the oOEMP [APP/7.8.3] that whilst there may be opportunities to do this, mechanical mowing is the default position.



Reference	Comments	Applicant's Response
SPPC1-4	Page 2, Q10.0.10 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.	ES Chapter 11: Soils and Agriculture [AS-018] will be updated as soon as practicable for the benefit of the Examination to include additional sites under the cumulative assessment, and to reflect the further information now available.
SPPC1-5	Pages 2 and 3, Q11.0.2 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 amount of planting had appeared to have died. Presumably these will be replaced? 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?	The advanced planting along the A1065 has been undertaken by the landowner irrespective of the outcome of the DCO Application. The Applicant, through ongoing discussions with the landowner, anticipates that the dead planting (including planting associated with the advance planting areas along the A1065 and other sites) will be replaced at the next planting season, in accordance with the Scheme's principles that are set out within the oLEMP [APP/7.11.2] . Paragraph 7.3.17 notes that: <i>"Any plants and trees which are found to be dying, damaged or diseased following planting will be replaced with the same species and specification for Years 1-5 of the Scheme, as per the timetable in Annex A – Outline Management Prescription Timetable. Thereafter, replacement planting will be required for any significant failures, identified through monitoring, and the specification for replacement planting will be appropriate to the conditions on Order limits, acknowledging the potential for conditions to change over the 60-year lifetime of the Scheme."</i> Paragraph 7.3.34 of the oLEMP [APP/7.11.2] also notes that: <i>"All trees and shrubs will be regularly watered for a minimum of two growing seasons and as required thereafter to ensure successful establishment. There will be ongoing monitoring of new planting and replacement of failures during the first two years of the operational phase."</i> The proposed watering regime over two seasons is considered sufficient for planting establishment. Any planting failures within 5 years of implementation would be replaced to ensure the successful establishment of these mitigation measures.
SPPC1-6	Page 3, Q12.0.2 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?	Section 6.6 of the Statement of Need [APP-042] describes overplanting in relation to large-scale solar schemes. It confirms that the Applicant is proposing overplanting at the Site in the indicative design of the Scheme. The Applicant proposes to deliver overplanting through a combination of the number of solar panels proposed to be installed, their orientation and layout, and the power rating of each panel. The indicative design has been predicated on panel technology available at the present time). Paragraph 6.11.9 and Paragraph 6.11.10 of the Statement of Need [APP-042] go on to conclude that: <i>"Overplanting and panel layout optimisation can both increase the likely annual generation of schemes through their grid connection points. This goes towards best meeting the urgent need for solar generation within the context of a constrained grid connection queue. The Scheme's illustrative layout delivers a commercially rational overplanting ratio."</i> <i>Any optimisation of layout at a detailed design stage would be unlikely to identify any areas of land which would be useful to keep out of the scheme for alternate use, e.g. arable farming. This is because any such areas identified would be likely to be around the edges of field margins and disconnected from any other areas similarly identified and therefore would have little or no agricultural purpose."</i>
SPPC1-7	Pages 4 and 5, Q14.0.5 The PC contends that this response is unsustainable in light of the problems that the Drovers, High Grove and also the Shipdham	The Applicant has undertaken the assessment of cumulative effects in line with the requirements of the EIA Regulations ¹ and the Planning Inspectorate's advice note on Cumulative Effects Assessment ^{11F} ² (as set out in ES Appendix 2.4: Cumulative Schemes [APP/6.4.1]) and has based the cumulative assessment on the best

¹ HM Government, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

² Planning Inspectorate, Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (September 2024)



Reference	Comments	Applicant's Response
	projects are having in negotiating substation sites with NGET and connection through NESO. 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. This again 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.	available evidence, with an explanation as to how the Applicant has attempted to source data, which is set out in the Applicant's Response to Relevant Representations [REP1-067] when responding to NCC38. The Applicant is committed to reviewing and updating the cumulative assessment as and when new evidence becomes available, in accordance with best practice. The Applicant is continuing to engage with the promoter of High Grove Solar Farm and the representatives of Sporle with Palgrave Parish Council.
SPPC1-8	Page 5, Q14.0.6 CAPC20 of Applicant's Response to Relevant Representations states: 'There are no potential long term significant adverse landscape effects beyond the Order limits.' 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. 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). 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.	The potential adverse landscape effects are detailed within ES Chapter 6: Landscape and Visual [AS-016]. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon D1 Swaffham Heath LCA and the E6 North Pickenham Plateau LCA. However, these effects upon the LCAs are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. With regard to judgement of effects, the assessment has followed the best practice Guidelines for Landscape and Visual Impact Assessment 3rd Ed (GLVIA3) 2013 which underpins the methodology and assessment approach detailed in ES Chapter 6: Landscape and Visual [AS-016]. Potential adverse effects during construction, operation and decommissioning phases on landscape character and visual amenity are detailed within Section 6.8 and Table 6-11 of ES Chapter 6: Landscape and Visual [AS-016]. ES Chapter 6: Landscape and Visual [AS-016] outlines the approach and details that cumulative effects may potentially arise from the Scheme in-combination with other solar developments in the locality. The list of cumulative developments was narrowed down to focus on those developments which are most likely to give rise to significant cumulative effects in-combination with the scheme. A long-list of other developments were identified within a 25km Study Area which was then refined to a short-list, which formed the basis of this assessment according to the Planning Inspectorates Guidance on Cumulative Effects Assessment. These can be found in Table 2-3 Long and Short List of Cumulative Schemes, within ES Appendix 2.4: Cumulative Schemes [APP/6.4.1]. The short listing of other schemes within the cumulative landscape and visual assessment was based upon the ZTV for the Scheme in isolation, the nature of the other developments, the distance from the Site, and professional judgement regarding the likelihood of significant cumulative landscape and visual effects. Only one development, High Grove Solar Farm, has the potential to result in significant cumulative landscape and visual effects within the Study Area. Section 6.11 of ES Chapter 6: Landscape and Visual [AS-016] undertook a cumulative assessment of the Scheme in-combination with High Grove Solar Farm to the south of the Site which concluded: • Significant adverse cumulative landscape effects during construction and operation on the E6 North Pickenham Plateau LCA • Significant adverse cumulative visual effects during construction stage for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave; and • Not significant cumulative visual effects for sequential or in-combination visual effects for walkers using the Peddars Way. The Draft Itinerary for an Accompanied Site Inspection [REP1-073] took account of SPPC's submission [PDA-004] which suggested locations for Site inspections. However, on review of the SPPC's submission [REP2-039], the Applicant agrees that reasoning for the inclusion/exclusion of VP46 was omitted in Table 2.2 of Draft Itinerary for an Accompanied Site Inspection [REP1-073]. Given that VP46 is in close proximity to the proposed walk



Reference	Comments	Applicant's Response
		between Locations 6 and 7 in the Draft Itinerary for an Accompanied Site Inspection [REP1-073], the Applicant welcomes the Examining Authority to consider continuing along Peddars Way briefly to VP46, before turning around and continuing along the prescribed route to Location 7 when finalising the ASI. Further collaboration with the applicant of the High Grove Solar Farm will be undertaken with regards to the embedded mitigation measures to reduce any potential cumulative landscape and effects. The oLEMP [APP/7.11.2] states at paragraph 7.2.32 that “planting mixes shown indicatively in the following section below will be reviewed further post consent and in collaboration with planting proposals for High Grove Solar Farm to ensure that there is a smooth transition of the “look and feel” between one solar farm and another.” The “smooth transition” between High Grove Solar Farm and the Scheme would limit further cumulative effects upon landscape character by ensuring new planting is well considered, connected and characteristic of the local landscape.
SPPC1-9	Pages 5 and 6, Q14.0.13 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.	In accordance with standard practice, the Applicant has produced an outline version of this management plan at this stage of the DCO process (i.e. submitted as part of the DCO Application). The outline Battery Safety Management Plan (oBSMP) [APP/7.14.1] outlines the processes, procedures and means by which the BESS safety management is to be conducted, implemented, and assessed, such that the BESS design and development, initial construction, and operational safety performance can be conducted with an acceptable level of residual risk, and provides the level of detail appropriate for this stage of the Scheme. In accordance with Requirement 6 of the draft DCO [APP/3.1.3], the Applicant is required to submit for approval a detailed Battery Safety Management Plan to the relevant planning authority, which must be substantially in accordance with the oBSMP [APP/7.14.1]. The detailed Battery Safety Management Plan is submitted at that stage to reflect the maturity of the Scheme and availability of detailed information and evidence to support safety claims, whilst enabling the detailed Battery Safety Management Plan to reflect the selected battery system and guidance that applies at that time. The Applicant, therefore, does not propose to depart from standard practice by submitting the detailed Battery Safety Management Plan at this stage of the DCO process.
SPPC1-10	Page 6, Q15.0.5 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. 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.	As responded to in the Applicant's Response to Written Representations and other Deadline 1 Submissions [REP2-028], specifically SPPC2-3, woodland habitats likely providing the focus of existing deer use will remain outside of the protection fencing, with wide corridors in particular along the droves which will provide continued routes through the Site for deer, as secured by Design Principles, Parameters and Commitments [APP/5.8.3]. These routes will therefore remain largely unchanged from the existing position. HM Government's England Deer Strategy sets out actions proposed in England to ensure the impacts of wild deer are not a threat to environmental, social or economic goals. Measures will be incorporated into the detailed Landscape and Ecological Management Plan in order to ensure compliance with this strategy, where appropriate, as secured within the oLEMP [APP/7.11.2]. The alignment of the fencing surrounding the Solar PV arrays is illustrated on the Green Infrastructure Strategy Plans which are appended to the oLEMP [APP/7.11.2]. The Applicant has also updated the Design Principles, Parameters and Commitments [APP/5.8.3] at Deadline 3 to secure this measure along the A1065. The Applicant does not consider it necessary to commit to the culling of deer within the oOEMP [APP/7.8.3]. The Applicant has made provision for the movement of deer through the Scheme and does not foresee deer having an adverse effect of the solar infrastructure within the Site. The Applicant considers the management of deer is a matter for local landowners, if deer are causing adverse impact to their operations.
Sporle with Palgrave Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2 – Traffic) [REP2-040]		
SPPC2-1	Page 2, Paras. 1 and 2 With reference to Table 2 [see representation] below and the results of the AADT's undertaken and shown in the ES and Traffic Assessment, the baseline for 2031 does not appear to be based	The approach of using the October 2024 data for the A1065 in the future 2031 baseline scenario instead of the more recent August 2025 data was undertaken in agreement with Norfolk County Council, as detailed within Section 2.4 of the ES Appendix 9.2: Traffic Assessment [APP-163], as the October 2024 identified a lower AADT for the A1065, which would in turn make the percentage impact of the Scheme and any cumulative effects more apparent, as the industry standard IEMA EATM Guidance (2023) referred to within ES Chapter 9: Transport



Reference	Comments	Applicant's Response
	on the AADT done in August 2025. (This AADT was requested by NCC). This is far more representative of peak traffic flows during the busy holiday season when the A1065 is used by visitors accessing the North Norfolk Coast. The PC would contend that when using these figures, and using the same Temprow factor as used by the Applicant on the AADT October 24 figures, more realistic projected peak traffic figures for 2031 are obtained, and these should be the ones used in arriving at the increase in traffic numbers caused by construction of the scheme. This is shown on Table 2 below [see representation]. Table 2 [see representation] also shows the impact of the Drovers construction traffic as supplied in the above documents based on the amended 2031 figures.	and Access [REP1-036] bases the significance of effects on percentage uplift, so using the lower value for the A1065 presents a more worst-case assessment. When utilising the lower 2024 data, the percentage uplift on the A1065 is significantly below the 60% threshold identified in the IEMA guidance for a significant effect to occur. Even with the additional traffic added in Table 2 of Sporle with Palgrave Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2 – Traffic) [REP2-040], the uplift shown is circa 14%, which would still be regarded as a negligible effect, and well below the 60% uplift threshold above which a significant effect could occur.
SPPC2-2	Page 2, Paras. 3 and 4 The NCC response to ExQ1 mentioned above states: Yes, NCC are happy that the effects are unlikely to be significant based on the information currently available. As per my previous correspondence, continued coordination between High Grove Solar, your team and the Highway Authority will be essential as both applications progress. This highlights the importance that PC representations have put on the need for speedy action during this examination 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. There is the possibility of the Jafa solar development also impacting this too. Table 2 [see representation] also shows the possible impact of High Grove based on figures from their PEIR documentation. (An estimation based on those figures has been made for the Jafa development also.). (High Grove state that they are likely to build both Western and Central areas of the development at the same time and therefore taking the two major proposed entry points AP01 and AP02, it is reasonable to take 2/3 of their daily traffic movements assuming the other 1/3 will be to the smaller Western area.)	The Applicant welcomes further engagement and coordination with Norfolk County Council and other stakeholders regarding construction and any cumulative effects. The oCTMP [APP/7.7.2] includes reference in Section 8 to the 'Traffic Management Working Group' (TMWG) which would be set up by the contractor and to which all Parish Councils would be invited to take part in to keep up to date on construction and relay any issues or concerns. Through the TMWG, coordination with other cumulative sites can also take place to minimise the likelihood of any significant effects. As noted in the Applicant's response to SPPC2-1 above, with the additional traffic added in Table 2 of Sporle with Palgrave Parish Council (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2 – Traffic) [REP2-040], the traffic uplift shown is circa 14%, which would still be regarded as a negligible effect, and well below the 60% uplift threshold above which a significant cumulative effect could occur.
SPPC2-3	Page 2, Paras. 5 and 6 It is noted that High Grove has updated their figures in course of discussions with local communities in the form of meetings and emails, however it is unknown what figures they will submit with their DCO application. This further supports the contention made in point 3 above. It is noted that NCC in their SoCG with the Applicant are still querying the methodology applied in assessing the cumulative impacts with High Grove.	The Applicant will continue to collaborate with any cumulative sites that come forward, including High Grove, as is secured through Section 5 of the oCTMP [APP/7.7.2]. The SoCG with Norfolk County Council [APP/5.12.1] has been updated at Deadline 3 to reflect the latest position, whereby in representation NCC33 of the Applicant's Response to Local Impact Reports [REP2-027] Norfolk County Council have confirmed that they are in agreement with the methodology and cumulative effects.



Reference	Comments	Applicant's Response
SPPC2-4	Page 2, Paras. 7 and 8 NCC have stated in their LIR that they considered Route C as unsuitable for construction traffic so the whole of the Drovers will be accessed off the A1065 by access A and access B. Again, in the SoCG, they continue to discuss the requirements and purpose for each access junction and the routing of traffic with the Applicant. The PC would wish to add their concern that this be clearly secured at this stage in the oCTMP as part of the DCO and any subsequent CMTP.	The Applicant has updated the oCTMP [APP/7.7.2] at Deadline 3 to confirm that vehicles associated with the Scheme will only utilise Route A and B, with all reference to Route C removed. The oCTMP [APP/7.7.2] also provides further clarification on what each of the respective access points will be utilised for.
SPPC2-5	Pages 2 and 3, Paras. 9 and 10 The overarching concern is the disruption to traffic traveling on the A1065 by the fact that there could be 4-5 construction access points between the A47 junction with the A1065 and where Southacre Road crosses the A47 just beyond Drovers access A and temporary access C as shown in Fig3.1 of the Traffic Assessment. On leaving the A47 junction heading north on the A47 the construction accesses are as follows: [see table 1 in the representation]. Table 1 [see representation] shows that over a distance of approximately 2.4km (1.5 miles) there will be possibly 4-5 construction accesses. This will cause considerable disruption with far reaching consequences if not properly managed and the PC is very sceptical of the general view of the Applicant and the traffic authorities that this will cause only insignificant impacts.	The access junctions proposed for the Scheme comply with the industry standard highway design guidance, including the Design Manual for Roads and Bridges (DMRB), and have been subject to a Stage 1 Road Safety Audit within ES Appendix 9.2: Traffic Assessment [APP-163] which concludes that there are no safety concerns. The Applicant will continue to collaborate with any cumulative sites that come forward in the area along the A1065, including High Grove, as is secured through Section 5 of the oCTMP [APP/7.7.2], to ensure that any opportunities to minimise construction peak overlaps are taken or that construction access demand is managed accordingly between sites.
SPPC2-6	Page 3, Para. 11 The PC welcomes that the oTP is appended to the latest version of the oCTMP. However, this is only a statement of intentions and no real hard data or actions to allay the PC's concerns and the concerns of local people. It only seems to concentrate on the traffic movements of operatives working on the site and not the considerable addition of HGV's to the traffic load which will be turning slowly off the A1065 and causing increasing delay to the traffic.	The Travel Plan that is an appendix to the oCTMP [APP/7.7.2] will be secured by the corresponding requirement for the detailed Construction Traffic Management Plan in the draft DCO [APP/3.1.3]. Prior to commencement, and to discharge the relevant requirement, a detailed Construction Traffic Management Plan and detailed Travel Plan will be produced by the contractor to provide more clarity on the measures and methodology that will be employed during construction. These detailed plans would then be submitted to the local planning authority for approval, in accordance with the draft DCO [APP/3.1.3] requirement. The focus of the Travel Plan is on staff travel, whilst the focus of the oCTMP [APP/7.7.2] is on mitigating construction traffic impacts. As identified within ES Chapter 9: Transport and Access [REP1-036], the additional uplift in HGVs from the Scheme is less than 10%, so well within typically levels of daily traffic fluctuation along the A1065, and is therefore not a considerable addition of traffic above what already takes place on the network.
SPPC2-7	Page 3, Para. 12 It is welcomed that in the oCTMP the intention is to avoid deliveries during the peak travel periods, the inclusion of arrival and departure procedures, plus the possibility of identification and GPS tracking measures to ensure correct routes are used. However, the practicalities of introducing these measures with delivery drivers (possibly foreign unused to UK driving conditions) passing through ports at times not under the contractor's control will make this considerably hard to achieve. The PC suggests that	The restrictions on delivery hours is common practice across the UK to avoid morning, evening or school peak hours. For the Scheme, the restriction on delivery hours is secured through the draft DCO [APP/3.1.3] via the oCTMP [APP/7.7.2]. The Applicant and/or contractor will be required to implement construction mitigation measures in accordance with the oCTMP [APP/7.7.2], as failure to do so (i.e. to not comply with the DCO) is a criminal offence. All staff will be briefed accordingly prior to commencement on the restrictions and the importance of compliance. For any staff who do not follow protocols, or in the event of non-compliance, appropriate action will be taken as secured through Section 8 of the oCTMP [APP/7.7.2].



Reference	Comments	Applicant's Response
	the ExA asks for evidence as to their effectiveness where these types of measure have been used.	
SPPC2-8	Page 4, Para. 15 In addition, Sporle, Castle Acre and the communities of the Nar Valley will have increasing difficulties accessing the A1065 via the Southacre Road junction (both north and south) and the nearby Castle Acre junction. Junctions that are particularly difficult to negotiate with heavy traffic (vision is severely restricted with traffic approaching from the north on the Southacre junction).	Based on the industry standard IEMA EATM Guidance (2023) referred to within ES Chapter 9: Transport and Access [REP1-036], the uplift in traffic from the Scheme is likely to fall well within daily levels of traffic fluctuation so is unlikely to lead to any additional delays or contribute to communities having difficulty accessing the A1065. An assessment of road safety is included within ES Appendix 9.2: Traffic Assessment [APP-163], with the study area extending over the A1065 and the adjacent junctions which join onto it, including South Acre Road (north and south). The review concluded that there are no existing safety concerns along the A1065 or the adjacent junctions.
SPPC2-9	Page 4, Para. 16 The review of collisions along the A1065 over the last 3 years in the Traffic Assessment concludes that there are no existing highway safety concerns. However, the A1065 is considered to be by many in Norfolk to be the most dangerous road in the county and six accidents causing injury in that period will do nothing to allay that concern. With increasing delays on the A1065 during the construction of both Drovers and High Groves and the likelihood of increased traffic on associated minor roads as a result, the PC is concerned for road safety.	An assessment of road safety is included within ES Appendix 9.2: Traffic Assessment [APP-163] which concluded that there are no existing safety concerns along the A1065. Whilst any collision is unfortunate, it is not regarded that the six collisions recorded across the three-year review period would suggest any existing concerns, given five of the six were recorded as slight, with the other recorded as serious. Based on the industry standard IEMA EATM Guidance (2023) referred to within ES Chapter 9: Transport and Access [REP1-036], the uplift in traffic from the Scheme is likely to fall well within daily levels of traffic fluctuation so is unlikely to lead to any additional delays or contribute to road safety risks. The cumulative assessment undertaken that has been agreed with Norfolk County Council (see representation NCC33 of the Applicant's Response to Local Impact Reports [REP2-027]) also concludes that there are unlikely to be any significant effects on traffic or highway safety, as there is a negligible effect on the A1065 and no material change from what would typically happen on any given day.
SPPC2-10	Page 4, Para. 17 With the above in mind and despite the ES 6.2.1 Chapter 9 Transport and Traffic (Tracked) stating in 9.8.13 that no localised capacity assessments need to be made, the PC would suggest that these be undertaken to allay concerns about the wider impacts on the local road system and to help form more detailed mitigation.	Through the restricted delivery hours and mitigation measures (including Travel Plan measures) secured via the oCTMP [APP/7.7.2], there will be a negligible impact from the Scheme during the AM and PM peak hours. On that basis, localised junction modelling would not be appropriate, as this typically is only assessed during the peak hours. This approach was agreed with Norfolk County Council within ES Appendix 9.1: Consultation and Legislation, Planning Policy and Guidance [APP-162].
SPPC2-11	Page 4, Para. 18 The PC would suggest that further work be done on the cumulative wider impacts on the county road system, taking into account High Grove, JAFA and also the likelihood of the Shipdham Airfield solar and BESS project being in construction at the same time.	The assessment undertaken within ES Appendix 9.2: Traffic Assessment [APP-163] concludes there are unlikely to be any significant cumulative effects associated with High Grove, JAFA and any other cumulative developments that may come forward (as detailed within the updated cumulative development list shown at ES Appendix 2.4: Cumulative Schemes [APP/6.4.1]) and have traffic along the A1065. The cumulative assessment undertaken that has been agreed with Norfolk County Council (see representation NCC33 of the Applicant's Response to Local Impact Reports [REP2-027]) also concludes that there are unlikely to be any significant cumulative effects on traffic or highway safety.
SPPC2-12	Page 4, Para. 19 All of these measures require considerably more thought to avoid delays and restrictions to the local populace in moving about locally over a considerable period. This will potentially engender considerable antagonism towards the development unless well managed and with increased community engagement.	The Applicant welcomes further engagement on the measures set out within the oCTMP [APP/7.7.2] to ensure that all stakeholders are engaged on the mitigation strategy.



3. The Applicant's responses to Prescribed Bodies

Reference Number	Comments	Applicant's Response
Environment Agency (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-035]		
EA1	<i>EA07 (Environmental Legislation)</i> <i>EA08 (Watercourse Buffers)</i> <i>EA09 (Otter and Water Vole)</i> <i>EA12 (Flood Risk – BESS)</i> <i>EA14 (Private Water Supplies)</i> <i>EA16 (Abstraction Licence)</i> <i>EA19 (Accuracy of Hydrogeological Model)</i> <i>EA22 (Shallow Groundwater)</i> <i>EA25 (Construction Mitigation Measures)</i> <i>EA26 (Drilling Fluid Breakout Plan)</i> <i>EA28 (Spills and Leaks)</i> <i>EA29 (Unexpected Contamination)</i> <i>EA30 (Contaminated Soils)</i> <i>EA32 (Drainage System)</i> <i>EA39 (Fire Suppressant Chemicals)</i> <i>EA40 (Spacing of BESS)</i> <i>EA43 (Use of Concrete)</i> <i>EA44 (Wheel Washing Facilities)</i> <i>EA49 (Requirement 13 – Construction Environmental Management Plan)</i> <i>EA50 (Requirement 14 – Operational Environmental Management Plan)</i> <i>EA51 (Dedicated Contaminated Water Tanks)</i>	The Environment Agency (EA) have confirmed in their Deadline 2 submission [REP2-035] that the items listed in the 'Comments' column have been agreed. This has been reflected within an updated SoCG with Environment Agency [APP/5.13.1] that has been submitted at Deadline 3.
EA2	Since our Relevant Representation, we have an additional issue to raise in regards to the procedure for discharge of requirements with draft Development Consent Order. Please see Appendix B below for more information.	The Applicant notes this comment and has responded in detail to this matter in the corresponding rows below.
EA3	Appendix A - Our comments regarding the issues we raised in our Relevant Representation The Applicant has stated in the in the 8.4 Applicant's Response to Relevant Representations [REP1-067] that they will be	The Applicant can confirm that updates to the EA IDs listed have been updated at Deadlines 2 and 3.



Reference Number	Comments	Applicant's Response
	providing updates on a number of our issues at a future deadline for the following issue IDs: - EA01 (Source Protection Zone) - EA02 (Drinking Water Protected Area) - EA03 (3D Representation of Groundwater) - EA04 (Groundwater Flow Direction) - EA05 (Maximum Foundation Extents) - EA13 (Sensitivity Criteria for Receptors) - EA15 (Chalk Rivers) - EA17 (WFD Groundwater Bodies) - EA20 (Boreholes) - EA23 (Interaction with Groundwater) - EA34 (Penstock Valve) - EA36 (Underground Contaminated Water Tanks) - EA42 (Missing Legislation) We will therefore not be commenting on the above issues as part of this deadline 2 response, and consider them as unresolved. We look forward to reviewing respective updates at a future deadline.	
EA4	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA06 (Avoidance of Pipelines)</i> We cannot resolve this issue. We were concerned that figure 16.1 [APP-131] did not show the approximate routes of the former Ministry of Defence (MoD) oil pipeline or Exolum pipeline which traverse the draft Order Limits. The Applicant has stated in the 8.4 Applicant's Response to Relevant Representations [REP1-067] that a revised figure had been submitted at deadline 1. We cannot locate this revised figure on the examination library. Please clarify which document the amendment has been included within.	ES Figure 16.1: Utilities Plan [APP/6.3.1] has been updated and submitted at Deadline 3 to show the routes of the known underground utilities within the Order limits. The Applicant has been in discussion with Exolum and the MOD regarding the nature, use, and ownership of the underground pipelines and they have been confirmed as ex-MOD decommissioned fuel pipelines. The locations of these are shown on the updated ES Figure 16.1: Utilities Plan [APP/6.3.1].
EA5	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>Further advice</i> We recommend that the reference to The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 also includes the following wording: <i>"These surface waters</i>	The Applicant confirms that reference to The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 within ES Appendix 12.1: Consultation, Legislation, Planning Policy and Guidance [APP/6.4.1] has been updated at Deadline 3 to include this wording.



Reference Number	Comments	Applicant's Response
	<i>are assessed at a water body catchment level. The legislation protects and enhances these waters by legislating against any deterioration in the ecological status of the waters or of their associated elements, and by requiring these waters and their associated elements to reach 'Good' ecological status/ecological potential. These objectives are captured in the relevant River Basin Management Plan."</i>	
EA6	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA10 (Invasive Non-Native Species)</i> We cannot resolve this issue at this time. We note that the 7.11.1 outline Landscape and Ecological Management Plan (Tracked) [REP1-061] and 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] have been updated to include specific reference to secure a detailed Invasive Species Management Plan (to include specific reference to Variegated Yellow Archangel and Three Cornered Garlic) within the detailed Landscape and Ecological Management Plan. We request that section 7.8.46 (or 7.9) of 6.2.1 Chapter 7 Ecology and Biodiversity (Tracked) [REP1-035] is updated to better reflect the changed ambitions of the INNS management, namely that the INNS management plan will seek to eradicate species within the Site (as mentioned in section 7.3.130 of the landscape environment management plan). Section 7.8.46 currently still reads that the species in the buffer areas will remain undisturbed.	The Applicant confirms that reference to the management of Invasive Non-native Species within ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] has been updated at Deadline 3 to confirm that the INNS Management Plan will seek to eradicate the named Invasive species within the Site.
EA7	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA11 (Waste Classification)</i> We cannot resolve this issue at this time. We were concerned that there was a lack of detail regarding outline measures for Duty of Care to ensure waste is described and classified correctly by the waste producer or holder, throughout all phases. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that the following documents have been updated to make specific reference to WM3: 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1 051]	The Applicant notes this comment and confirms that the oCEMP [APP/7.6.3], oOEMP [APP/7.8.3], and oDS [APP/7.10.2] were updated at Deadline 2 to make specific reference to WM3, to ensure all waste is appropriately classified before a suitable route for recovery or disposal can be identified.



Reference Number	Comments	Applicant's Response
	7.8.1 outline Operational Environmental Management Plan (Tracked) [REP1 055] 7.10.1 outline Decommissioning Strategy (Tracked) [REP1-059] We cannot find any reference to WM3 in the above documents. Therefore, we cannot resolve this issue.	
EA8	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA18 (Groundwater Levels)</i> We cannot resolve this issue. We were concerned that there was a lack of clarity regarding where groundwater levels have been recorded as artesian or sub-artesian, and it is not readily apparent how the recorded borehole groundwater level and interpolated groundwater levels reported in Table 12.8 [APP-061] relate to ground level. The Applicant stated in the 8.4 Applicant's Response to Relevant Representations [REP1-067] that Tables 12.7 and 12.8 in ES Chapter 12: Water Resources [APP 061] would be updated deadline 1. We cannot locate a revised Water Resources chapter on the examination library.	ES Chapter 12: Water Resources [APP/6.2.2] was updated at Deadline 2, following receipt of groundwater elevations derived from the Environment Agency's North East Anglia Chalk (NEAC) model in May 2026. Additionally, the Environment Agency requested a technical note be provided summarising a review of groundwater model data from the NEAC Model, provided by the EA on 6 June 2026, and to identify any implications for the hydrogeological model and conclusions presented in ES Chapter 12: Water Resources [APP/6.2.2]. The Applicant subsequently submitted Technical Information Note - Groundwater Elevation Methodology [REP2-029]. The updated ES Chapter 12: Water Resources [APP/6.2.2] provided at Deadline 2 shows that the overall conclusions of the ES remain valid due to the strong correlation between triangulated groundwater levels and NEAC model outputs and limited and localised potential for groundwater interaction with infrastructure. Furthermore, the triangulated dataset provides a suitable validation dataset for NEAC outputs and support the existing hydrogeological conceptual model.
EA9	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA21 (Trenchless Installation Methods)</i> We cannot resolve this issue. We were concerned that Section 12.7.7 [APP-061] excludes some key mitigation measures related to the hydrological environment. We requested inclusion of the following measures: - Hydrogeological Impact Assessment (HIA) for all trenchless crossings due to the sensitivity of watercourses and Principal aquifer, including Water Features Survey for all surface water bodies - Development of drilling fluid breakout plans for all trenchless crossings - Clarify the launch/receptor pit working area distance from watercourses The Applicant stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that they updated the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] to specify a hydrogeological risk assessment and drilling fluid breakout plans for HDD drilling activities. However, the	The oCEMP [APP/7.6.3] and Design Principles, Parameters and Commitments [APP/5.8.3] have been updated at Deadline 3 to commit to undertaking a Hydrogeological Impact Assessment for all trenchless crossings. ES Chapter 12: Water Resources [APP/6.2.2] has been updated at Deadline 3 to include a HIA and drilling fluid breakout plans for all trenchless crossings within Section 12.7.



Reference Number	Comments	Applicant's Response
	commitment to undertake a hydrogeological risk assessment is only explicitly stated in relation to foundations and piling – it is not stated for HDD breakout risk for trenchless crossings. To resolve this issue, we require all trenchless crossings to also commit to hydrogeological risk assessments. Commitments should be provided in the outline Construction Environmental Management Plan (Tracked) [REP1-051] and the 5.8.1 Design Principles, Parameters and Commitments (Tracked) [REP1 017].	
EA10	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA24 (Foundation Work Risk Assessment)</i> We cannot resolve this issue. We were concerned that the FRA [APP-170] stated that a Foundation Works Risk Assessment would only be required if piling goes deeper than the highest recorded groundwater level. In the 8.4 Applicant's Response to Relevant Representations [REP1-067] it is stated that “the oCEMP [APP/7.6.1] has been updated to state that the final choice of foundations for Work Nos. 2 to 4 will not indirectly interact with the underlying aquifer”. We have been unable to locate this statement within the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051].	The Applicant confirms that the oCEMP [APP/7.6.3] has been updated at Deadline 3 to explicitly state that the final choice of foundations for Work Nos. 2 to 4 will not indirectly interact with the underlying aquifer.
EA11	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA27 (Hydrogeological Impact Assessment)</i> We cannot resolve this issue. We were concerned that the definition provided in table 6 [APP-186] was vague in regards to the trenchless crossing techniques and mitigation measures to avoid impacts to groundwater may not be sufficient. The Applicant stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] “The Applicant refers to its response to EA23 above.” However the reference number column, and our relevant representation ID does not match up in this document. It is therefore unclear what they are referring to. Regardless, we note that tables 6, 7 and 17 of the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] have not been updated to refer to the production of a HIA for trenchless works.	The Applicant confirms that tables 6, 7, and 17 of the oCEMP [APP/7.6.3] have been updated at Deadline 3 to include reference to the production of a Hydrogeological Impact Assessment for trenchless works.



Reference Number	Comments	Applicant's Response
EA12	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA31 Removal of buried cables</i> We cannot resolve this issue. We were concerned that decommissioning proposals did not determine whether buried cabling would be removed, or detail the mitigation measures to minimise their potential to act as a contamination source if retained. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067], that "all below-ground cabling will be left in situ". We note that the table 7 in 7.10.1 outline Decommissioning Strategy (Tracked) [REP1-059] has been updated to state that: • "methods for cutting and sealing cables during the decommissioning phase will be in accordance with industry best practices at the time." • "where cables are buried under watercourses, ditches, roads and potentially sensitive vegetation, it is anticipated that the BPEO will be to leave the cable ducting (or the whole cables, if separate ducting is not used) in situ." We require the environmental risk assessment and selection of Best Practicable Environmental Option (BPEO) to also consider total or partial cable removal. We encourage the Applicant to consider the practicability of future cable removal at the design stage.	The oDS [APP/7.10.2] was updated at Deadline 1 to specify that all below ground infrastructure, including cabling, would be removed up to a depth of 1.2m to allow for the continued agricultural use of the land, as part of the decommissioning phase. Below this depth, all below-ground cabling will be left in situ, as this would allow for the cultivation of land after the Scheme has been decommissioned. This approach minimises soil disturbance by avoiding unnecessary handling. It also reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Scheme. This is principally in accordance with the approach taken for the recently-granted Springwell Solar Farm Order 2026, and therefore has precedent in front of the Secretary of State. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route. The oDS [APP/7.10.2] was updated at Deadline 1 to commit to specifying the technique to cut and seal cables prior to the decommissioning phase, based on best practice at the time. It is considered proportionate for an environmental risk assessment and selection of Best Practicable Environmental Option (BPEO) to be undertaken to inform the detailed Decommissioning Strategy, in advance of the commencement of the decommissioning works. The decommissioning works are not expected to commence until after the 60-year operational phase of the Scheme, at which point the BPEO may be substantially different to that of today, and would likely require undertaking as part of the detailed Decommissioning Strategy regardless.
EA13	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA33 (BESS Mitigation Measures)</i> We cannot resolve this issue. We were concerned that the outline Construction Environmental Management Plan (CEMP) [APP-186] did not clearly state that the BESS units would only be installed once the mitigation measures are in place. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that there will be site design safety elements in place prior to the BESS being installed. We request a commitment in the outline CEMP stating that the minimum components of the site fire safety systems will be identified in the CEMP. These components must be in place and confirmed as operational before installation of the BESS, including drainage infrastructure (including a penstock), firefighting water supply, and access roads to ensure these measures are secured.	The Applicant notes this comment and has updated the oCEMP [APP/7.6.3] to state that the minimum components of the Site fire safety systems will be identified in the detailed Construction Environmental Management Plan and that these components must be in place and confirmed as operational before installation of the BESS, including drainage infrastructure (including a penstock), firefighting water supply, and access roads to ensure the timing of these measures are secured.



Reference Number	Comments	Applicant's Response
EA14	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA35 (Removal of Captured Firefighting Water)</i> We cannot resolve this issue, however we recognize that progress has been made towards its resolution. We were concerned that there were insufficient arrangements to ensure that the removal of captured firefighting water would not pose a risk of environmental pollution. We acknowledge the update to section 2.14.3 of the 7.8.1 outline Operational Environmental Management Plan (Tracked) [REP1-055]. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that further updates will be made at a future deadline.	ES Appendix 12.2: Flood Risk Assessment [APP/6.4.3] was updated at Deadline 2 to address a BESS fire scenario and to confirm that captured fire suppressant will be tankered offsite to a licenced facility where treatment will occur, rather than be tested onsite and released to the wider hydrological environment. This approach is consistent with that of the Great North Road Solar and Biodiversity Park DCO. The oOEMP [APP/7.8.3] and the oBSMP [APP/7.14.1] have been updated at Deadline 3 to reflect this commitment.
EA15	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA37 (Spills and Leaks – BESS and Substation Drainage Systems)</i> We cannot resolve this issue, however we recognize that progress has been made towards its resolution. We were concerned that there was an absence of measures to identify and manage the risk of pollution during normal operation of the BESS and Substation sites, when surface water runoff would directly infiltrate into groundwater and surface waterbodies. We acknowledge the update to the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] to confirm that drainage system outfalls, such as installing 'sentinel' monitoring systems, will quickly identify if pollutants are found to be entering the drainage system and enable remedial action. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that updated to the FRA will be made at a future deadline.	The Applicant confirms that ES Appendix 12.2: Flood Risk Assessment [APP/6.4.3] was updated at Deadline 2 to confirm that drainage system outfalls, such as installing 'sentinel' monitoring systems, will quickly identify if pollutants are found to be entering the drainage system and enable remedial action.
EA16	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA38 (Storage of Waste Batteries)</i> We cannot resolve this issue. We were concerned that there was an absence of mitigation measures relating to the storage of waste batteries.	The Applicant notes this comment and has updated Table 4.11 in the oOEMP [APP/7.8.3] and Table 22 in the oDS [APP/7.10.2] to make reference to the measures pertaining to the management of damaged or end-of-life batteries. The oOEMP [APP/7.8.3] and oDS [APP/7.10.2] are the documents that have been updated (rather than the oBSMP [APP/7.14.1]) as this will be the secured route for waste management measures.



Reference Number	Comments	Applicant's Response
	The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067]: “End-of life or damaged BESS units are to be electrically disconnected from the system when identified as being required [full text not quoted here]...” The 7.14 outline Battery Safety Management Plan [APP-194], nor the 7.8.1 outline Operational Environmental Management Plan (Tracked) [REP1-055] do not refer to the above mitigation measures. The outline Battery Safety Management Plan (oBSMP) should be updated to confirm the management of damaged or end-of-life batteries.	
EA17	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA41 (Thermal Effects of Buried Cables)</i> We cannot resolve this issue. We were concerned regarding the omission of buried cables from potential contaminant sources in the Operational Phase Conceptual Site Hydrogeological Model. We require more information to be able to concur with the Applicant's conclusion in 8.4 Applicant's Response to Relevant Representations [REP1-067], that the potential for thermal discharge from buried HV cables is low. Please view the following advice, and consider the Desk-based risk assessment section: Following the 2023 amendments to the Environmental Permitting Regulations 2016 heat is now a groundwater pollutant. Discharge of heat to water should be a material consideration for developments involving emissions of heat e.g., buried electrical cables, particularly NSIPs or large-scale infrastructure developments. To date heat input to ground has been considered lower risk to groundwater, on the understanding it readily disperses in the surface layers and air and in general does not have any widespread adverse impacts on the ground and groundwater. However, in very sensitive locations, we may want to regulate higher risk activities to prevent further increase/deterioration of the groundwater quality. The Environment Agency is currently developing guidance about heat as a pollutant to groundwater and to date has published a regulatory position statement, guidance on the exemptions, and a permitting regime for open and closed loop ground source heating a cooling systems (GSHCs). The guidance will draw upon the Environment Agency's Chief Scientist's Group published report for Ground Source Heating and Cooling (GSHC) systems. This report examines the potential for ground source heating and cooling systems to change the temperature in the ground and identifies receptors that could be impacted.	The Applicant maintains that the potential for thermal effects on groundwater is low. The Scheme is substantially compliant with the exemptions listed in the EA's <i>Closed loop ground source heating and cooling systems: exemption conditions</i> guidance, specifically: • The buried cable system would be a fully sealed system and would not discharge pollutants to the environment during operation • The Scheme has been designed to avoid surface water or groundwater pollution, as measures to protect the water environment during construction are secured through the oCEMP [APP/7.6.3] and the commitment to a Foundations Works Risk Assessment (FWRA) • The cable route is not located within 50m of a well. Spring or borehole used for domestic or food production purposes • ES Figure 7.1: Ecological Designations [APP-109] shows the Core Study Area is not located within any protected ecological sites or ancient woodland that could be affected by localised thermal changes • As outlined in ES Chapter 12: Water Resources [APP/6.2.2] designations are approximately 1 km from Work Nos which could have cabling and will therefore not be affected by thermal emissions • The cable route is not located adjacent to a septic tank, cesspit or associated infiltration system; and • Measures to prevent pollution of groundwater during decommissioning are secured through the oDS [APP/7.10.2]. It should be noted that the majority of cabling will be installed to a depth of 1.2m to 2m, as outlined in Table 3-1 - Work No 1 of Design Principles, Parameters and Commitments [APP/5.8.3] and as such has very limited potential to transfer heat to groundwater. The very western section of the Order limits is located within Source Protection Zone 1, as shown on ES Figure 12.5: Source Protection Zone [APP/6.3.1] which has been updated at Deadline 3. Maximum groundwater elevations in this section of the Order limits are 25-30m below ground level. As such, there is 10-15m headroom between the maximum cable depth for HDD and groundwater, meaning there is negligible potential for heat to be transferred from cables within Source Protection Zone 1. Outputs from the Environment Agency NEAC groundwater model show that only 0.4% of the Order limits has the potential to interact with groundwater where the maximum level is within 15m of the ground surface, and where this is the case the groundwater body will not be continually at that level. Additionally, where groundwater elevations in the wider Order limits have the potential to be within 15m of the ground surface, the interaction with HDD installed cables is a very small proportion of the North West Norfolk Chalk Water Body, which has an approximate area of 36,631.4ha. The considerable size of the overall groundwater body area means that a substantial volume of groundwater will be moving through the body at any given time. As shown on the flow pathway outputs of the Environment Agency's NEAC groundwater model, the chalk aquifer is characterised by continual groundwater movement and significant groundwater storage. Consequently, any



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	<i>Permitting implications</i> Heat is a pollutant, so discharges that might lead to an input of heat into groundwater are groundwater activities. Groundwater activities are defined in section 3.34 pp20 of DEFRA's Environmental permitting: Core guidance. However, we take a proportionate and pragmatic approach in our application of the principles of the Environmental Permitting Regulations. Requiring a permit would feel disproportionate for many activities at or near the ground surface. Accountability to comply with extant environmental legislation lies with the developer and the landowner. They should consider the thermal implications of developments which emit heat such as buried electricity cables, and the potential risks to the water environment via a desk-based assessment, as a minimum. <i>Desk-based risk assessment</i> Currently, the main driver for the prevention of heat pollution is to protect surface water ecology, protected sites and ancient woodlands. Heat should also not impact quality or quantity of water in existing groundwater or surface water abstractions. In the first instance the developer should ensure that where practicable the proposed cabling: • is fully sealed, • does not discharge pollutants other than transfer heat to the environment, • does not cause pollution of surface water or groundwater, • is not within a groundwater source protection zone 1 (SPZ1) that's used to supply water for domestic or food production purposes, • is not within 50m of a well, spring or borehole used to supply water for domestic or food production purposes, • installation does not mobilise any contaminants present in the subsurface to the extent that the pollution of groundwater occurs, • is not adjacent to a septic tank or cesspit, including the infiltration system	localised heat transfer to groundwater (advection) would be subject to rapid dilution, dispersal and thermal dissipation within the wider groundwater body. Any temperature increases would therefore be highly localised, temporary and indistinguishable from normal natural temperature variations within the subsurface environment. As such, the effects of dilution and heat dissipation on any localised groundwater that interacts with the buried cables will be substantial and the risks relating to groundwater temperature changes are considered to be very low, especially at the abstraction point (Marham) approximately 6.5km south east of the Scheme and would be temporary in nature i.e. only having the potential to occur when maximum groundwater levels occurred. The Applicant, therefore, maintains that the conclusions presented within the Applicant's Response to Relevant Representations [REP1-067] remain robust and that buried cable thermal emissions do not represent a significant environmental effect requiring further assessment or mitigation.
EA18	Desk based assessments at the planning stage should scope in heat from electricity cables. The GSHC exemption criteria and resources referenced in this document could help assess the risk. For example: either by de-risking, if all criteria are met or further assess the risk, where the criteria are not met and mitigate the risk, where required. In other words, sections of the cabling route that meet all of these criteria, and where the developer is satisfied	The Applicant responded to this comment as part of the Applicant's Response to Relevant Representations [REP1-067] (see EA44) but reiterates its position here. The final design of the cable trenches, including whether they will be fully sealed, will be determined during the detailed design phase. This will be informed by the results of ground investigations (as committed to within oCEMP [APP/7.6.3]), together with any relevant evidence, guidance, or emerging best practice. It is anticipated that the cables will be sealed (i.e., the cables will not be exposed, as they will incorporate an insulating layer protecting the



Reference Number	Comments	Applicant's Response
	that the cables will not cause harm via discharge of heat and heat pollution, can be scoped out from requiring further risk assessment. You do not need to complete any further assessments or apply for a permit if your cabling route meets all the exemption conditions. If cabling sections require further assessment following application of these exemptions, a conceptual site model (drawing) should be produced. We ask for the model to demonstrate the proposed installation depth, anticipated depth to groundwater, and specification of the cable installation, including thermal insulation measures. An understanding of the expected normal and maximum operating temperature of the cables, and the depth of any nearby abstraction boreholes will be useful in determining risk. In those rare instances where we are concerned that there are risks which require ongoing control or management, you may require a groundwater activity under schedule 22 of the Environmental Permitting Regulations (EPR) 2016.	conductor). Accordingly, thermal discharge from the cables is expected to be low, and the electrical cables are therefore not considered to present a risk of contaminating surface water or groundwater. Furthermore, the oCEMP [APP/7.6.3] sets out a range of measures designed to safeguard surface water and groundwater from pollution during cable installation activities. The detailed Construction Environmental Management Plan, to be prepared in accordance with Requirement 13 of the draft DCO [APP/3.1.3], will secure the implementation of the mitigation measures identified in the oCEMP [APP/7.6.3] (including a Bentonite Breakout Plan) and will provide detailed construction method statements for the installation of the cable trenches.
EA19	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA45 (Water Quality Monitoring)</i> We cannot resolve this issue. We were concerned that there was insufficient detail provided regarding monitoring for increased sediment in surface water runoff and chemical pollution. We note the Applicant's response in 8.4 Applicant's Response to Relevant Representations [REP1-067]. We require commitments stating the following: • monitoring locations must be specified as upstream and downstream of any discharge outfalls and crossings, • frequency should be at least monthly, starting at least 6-months before construction, occurring throughout construction and into operation. We require these commitments to ensure that there is a pre-construction baseline to compare post-construction monitoring results with. This is the same approach adopted by Great North Road Solar and Biodiversity Park, and East Park Energy.	Regarding monitoring locations, as outlined in ES Chapter 12: Water Resources [APP/6.2.2], the watercourses within Work Areas which require construction activities are not hydrologically connected to the wider surface water environment (i.e. are blind ditches without outfalls or confluences). As such, Table 7 of the oCEMP [APP/7.6.3] commits the Scheme to monitoring at locations on the principal watercourses downstream of the Scheme infrastructure and upstream of other non-natural influences, and the locations and parameters will be agreed with the Environment Agency prior to establishing the hydrochemical baseline. This is appropriate as the mechanism of hydrological linkage is likely to be throughflow (subsurface) rather than via watercourse transfer. Regarding sampling frequency, Table 7 of the oCEMP [APP/7.6.3] already commits to monitoring twice per month for at least six months prior to the construction phase and, as such, does not require updating.
EA20	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA46 (Environment Agency Protective Provisions)</i> We cannot resolve this issue.	The Applicant has been in discussions with the Environment Agency in relation to this matter. It is the Applicant's position that, whilst the majority of the Order limits are located within Flood Zone 1, there is a minor section of Work No. 11: Mitigation and Enhancement Area, associated with Skylark plots, which is located in Flood Zones 2 and 3. As such, activities could be carried out on the floodplain of a main river, more than 8 metres from the river



Reference Number	Comments	Applicant's Response
	Protective provisions are included in the 3.1.1 draft Development Consent Order (Tracked) [REP1-005] (Part 5). In correspondence with the Applicant (dated 21 May 2026), we identified that they wish to disapply Flood Risk Activity Permits (FRAPs). As the site does not lie in the flood plain of a main river, we do not believe FRAPs would be necessary, and therefore, neither is disapplication. We do not consent under Section 150 of the Planning Act 2008 to the removal of consent requirements. We request the removal of the protective provisions for the Environment Agency in the draft Development Consent Order.	bank, such as stockpiling in this area. Therefore, in accordance with the Government's guidance entitled 'Flood risk activities: environmental permits', such activities could require a FRAP. The inclusion of disapplication therefore serves as a contingency to avoid unnecessary consenting duplication, rather than reflecting a substantive need for FRAP consent across the Scheme. In accordance with this approach, the Applicant updated the protective provisions for the benefit of the Environment Agency in Part 5 of Schedule 15 of the draft DCO [APP/3.1.3] at Deadline 1 to mirror the Environment Agency's preferred wording.
EA21	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA47 (Requirement wording)</i> We cannot resolve this issue. We were concerned over the use of the word "substantially" on numerous requirements in the 3.1 draft Development Consent Order [APP-018], as its inclusion would render those requirements imprecise and unenforceable. This is against government policy (National Planning Policy Framework (NPPF)) and the six tests sited in Paragraph 57 of the NPPF. We do not agree with the Applicant's response stated in 8.4 Applicant's Response to Relevant Representations [REP1-067].	The Applicant considers that the inclusion of "substantially" is necessary to ensure that there is sufficient flexibility for the detailed management plan to be updated so that it properly controls the Scheme following detailed design. It is noted that Lincolnshire County Council, an authority with considerable experience with solar DCOs, confirmed the appropriateness and suitability of this drafting on the Springwell Solar Farm (EN010149), stating: "<i>in particular, [the Council] is satisfied that requiring the written scheme of investigation to be "substantially in accordance with" the outline scheme would allow appropriate flexibility to respond to issues arising from detailed design or any other new relevant circumstances whilst still preserving the ability of the planning authority to refuse to approve any scheme it considers inappropriate or inadequate, whether or not it is substantially in accordance with the outline scheme</i>" (see [REP3-079] on the Springwell project). Schedule 16 (Procedure for discharge of Requirements) ensures that any variation in the detailed management plan does not erode the environmental protections, placing an obligation on the Applicant to proactively include a statement to confirm whether the subject matter of the application will give risk to any materially new or materially different environmental effects (paragraph 2(4)). In such circumstances, if the application is not responded to, it is deemed refused, ensuring that new effects are not authorised inadvertently. The Applicant remains confident that the inclusion of the word "substantially" is appropriate and provides necessary flexibility for the detailed design of the Scheme and in no way waters down the environmental protection provided by the Requirements and the management plans. The Applicant, therefore, does not agree with the assertion that the word "substantially" results in a requirement being unenforceable and imprecise, nor is this wording against Government policy. This phrasing, for detailed management plans to be substantially in accordance with outline management plans, is extremely well-precedented across made DCOs (i.e. statutory instruments) from all industries, including all made solar DCOs. The Applicant, therefore, does not propose to depart from standard practice in this regard.
EA22	Appendix A - Our comments regarding the issues we raised in our Relevant Representation <i>EA48 (Permitted Preliminary Works)</i> We cannot resolve this issue. We were concerned that the definition of "permitted preliminary works" includes '(d) remedial work in respect of any contamination or other adverse ground conditions', while the definition of "commence" excludes activities defined as "permitted preliminary works", i.e. it does not include 'remedial work in respect of any contamination or adverse ground conditions'. Therefore, the CEMP secured via Requirement 13, only requires submission of a detailed CEMP prior to commencement. This means that	As set out in the Applicant's Response to Local Impact Reports [REP2-027], the Applicant will submit a permitted preliminary works environmental management plan at Deadline 4. This will set out the methodology to be used for any permitted preliminary works, and the Applicant will welcome comments from Interested Parties on this plan. In anticipation of this plan, the Applicant updated Requirement 13 in Schedule 2 of the draft DCO [APP/3.1.3] at Deadline 2 to require that the permitted preliminary works are carried out in accordance with the permitted preliminary works environmental management plan.



Reference Number	Comments	Applicant's Response
	remediation of the site could take place without the CEMP being approved or in place and therefore without the controls and mitigation commitments offered by the CEMP. We do not agree with the Applicant's response stated in 8.4 Applicant's Response to Relevant Representations [REP1-067]. We raised similar concerns for Frodsham Solar Project and Great North Road Solar and Biodiversity Park. For Frodsham Solar Project, the respective Applicant was able to resolve our concerns by clarifying in their 8.17 SoCG Environment Agency P04 [REP7-029] that: "Requirement 12(4) of Schedule 2 of the draft DCO (PD2-005) identifies that 'commence' includes any permitted preliminary works comprising above ground site preparation for temporary facilities for the use of contractors and site clearance (including vegetation removal and demolition of existing buildings and structures) and remedial work in respect of any contamination or other adverse ground conditions where this relates to Work no. 6C. As such a CEMP for these phases of work is required prior to them being undertaken" For Great North Road Solar and Biodiversity Park, the 3.1G Draft Development Consent Order (Tracked) - Rev 8 [REP6-006] stated for its CEMP requirement: "All permitted preliminary works must be carried out in accordance with the outline construction environmental management plan." In both instances, any permitted preliminary works were covered by contamination mitigation commitments included in the respective CEMPs.	
EA23	Appendix B – additional comments on the draft Development Consent Order <i>Development Consent Order</i> As a named consultee on the discharge of several Requirements, we request that the provision of at least 15 working days (21 calendar days) to respond to the discharge authority is reflected in the draft Development Consent Order (APP-018). Specifically, this should be addressed within Schedule 16 procedure for discharge of requirement, Further information and consultation, 3.(3). Ensuring this timeframe will give us sufficient opportunity to thoroughly review any discharge of requirement applications and provide considered feedback. Furthermore, this is in-keeping with the statutory 21-day response time for town and country planning applications. We therefore request the following wording is input into the Schedule 16 3.(3): <i>"If the provision governing or requiring the application specifies that consultation with a requirement consultee is required, the relevant planning authority must notify the requirement consultee within 10 working days of the receipt of the application that an application has been received. Thereafter the requirement</i>	As part of the discharge process, the Applicant is required (under paragraph 2(1) of Schedule 16 of the draft DCO [APP/3.1.3] to submit a copy of the documentation to the relevant named consultee at the same time as submitting it to the relevant planning authority, meaning the documentation is available to the relevant named consultee (e.g. the EA) from the first day of the 8-week approval period (under paragraph 2(2) of Schedule 16 of the draft DCO [APP/3.1.3]). There is also a period (under paragraph 3(2) of Schedule 16 of the draft DCO [APP/3.1.3]) in which consultees can require further information, which is an additional 10 working days. The relevant planning authority can consider this information and/or request further information. The Applicant emphasises that it is not in its interest to submit documents for discharge without discussion in advance. Further, the Applicant notes that there is no need for a specific statutory requirement mandating pre-submission consultation as it is in the Applicant's interests to engage early in order to facilitate the efficient discharge of requirements. In addition, the discharge process encompasses a range of plans and documents of differing complexities. Some submissions may relate to minor matters which would not require the full determination period for review, whereas others are likely to be more detailed and would justify the full period of consideration. Lastly, the Applicant notes that the wording and timeframes proposed in paragraph 3(3) of Schedule 14 of the draft DCO [APP/3.1.3] are precededented in the Longfield Solar Farm Order 2023 and the Tillbridge Solar Order 2025, and therefore the Applicant does not propose to depart from this precedent by amending the wording as proposed.



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	<i>consultee has 15 working days from the receipt of the notification in which to submit any representations relating to the application to the relevant planning authority. The relevant planning authority must notify the undertaker in writing specifying any further information the relevant planning authority considers necessary of that is has been requested by the requirement consultee within 10 working days of the receipt of such a request from the requirement consultee and or in any event within 25 working days of the receipt of the application (or such other period as is agreed in writing between the undertaker and the relevant planning authority)”</i>	
EA24	Appendix C – advice and informatives We note the Applicant's statement in 8.4 Applicant's Response to Relevant Representations [REP1-067] about not encountering springs during the Hydrology or Ecology walkovers. As indicated by British Geological Survey (BGS) Karst Report Series C3: Karst in the Chalk of East Anglia (Karst report series - BGS Groundwater) there is local evidence of karst dissolution features in the form of dolines, dissolution pipes and springs. This includes a large spring, Castle Acre Spring, at National Grid Reference (NGR) 582450, 314930, approximately 1.1km NE of the Order Limits which tracer tests have demonstrated is hydraulically connected to Little Palgrave Hall observation borehole approximately 1.5km away. The potential for karst and other solution features to be present within the Proposed Development cannot be discounted. The groundwater flow rate in these features can be significantly greater than in the surrounding bedrock. Therefore, these natural features can act as rapid pathways for any pollutants or for loss of pumped concrete. Piling, other foundations, or other penetrative works at depths (such as trenchless drilling), or the introduction of new infiltration drainage systems significantly increasing localised infiltration volumes, could disrupt groundwater flow, and may result in reactivation of previously dormant features or the creation of new solution features. Continuous Flight Auger (CFA) piling activities could result in the loss of pumped concrete into karst features if encountered, resulting in contamination of groundwater. Should the use of CFA piling be necessary, we strongly recommend that mitigation measures are put in place to continuously monitor for loss of concrete during piling activities. We advise that any Hydrogeological Risk Assessments, Foundation Works Risk Assessments, infiltration drainage design, CEMP or other assessments and plans relating to ground conditions and subsurface water environment, include methods and mitigation to minimise risks from interaction with these features. These would be informed by an appropriate ground investigation.	The oCEMP [APP/7.6.3] has been updated at Deadline 3 to include a watching brief during Continuous Flight Auger piling to monitor for the loss of concrete during piling activities. The oCEMP [APP/7.6.3] has been updated at Deadline 3 to confirm that any FWRA, HIAs, infiltration design, and any other ground or sub-surface activity assessments are informed by a ground investigation.



Reference Number	Comments	Applicant's Response
EA25	Appendix D – A summary of our position [This Appendix provides a summary of the party's position, in accordance with Appendix A of the submission]	The Applicant notes this comment and refers to its responses to EA4 – EA24 above.
National Highways Limited (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-036]		
NH1	Pages 4 to 6, Refs. NH3 to NH5 NH is in ongoing discussion with the Applicant regarding an acceptable form of Protective Provisions.	The Applicant agrees with this comment and welcomes the ongoing engagement with National Highways on the matter of protective provisions.
NH2	Page 7, Ref. NH8 NH's understanding is that temporary possession is required only to facilitate the movement of Abnormal Indivisible Loads via the temporary removal of street furniture, verge reinforcement, vegetation removal or temporary widening that may be required for the future AIL delivery at the junctions in the vicinity of the A47 junction with the A1065 during construction. NH objects to the temporary acquisition of all these plots as it would fetter its duties in respect of road safety. The inclusion of these plots in the Book of Reference is not justifiable as required by the Planning Act Compulsory Acquisition Guidance since where street furniture or signage needs to be temporarily removed or repositioned or vegetation removal or temporary widening is required to allow an AIL to pass, this can be arranged via NH's normal processes for permitting works on the highway having followed the procedures in its template protective provisions.	The Applicant has included temporary acquisition over plots owned by National Highways to ensure the necessary works (i.e. Work No. 8A) can be carried out as part of the Scheme. The Applicant has been seeking to acquire the relevant land (for temporary use) by voluntary agreement and the Applicant remains engaged with National Highways to agree a form of appropriate protective provisions to facilitate the necessary works under the procedures preferred by National Highways, such that the relevant works do not impact their statutory undertaking. This approach of seeking powers of compulsory acquisition in the draft DCO [APP/3.1.3] and, in parallel, conducting negotiations to acquire land and rights by agreement, accords with the Department for Communities and Local Government Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land (2013) (i.e. the guidance referred to by National Highways).
NH3	Pages 34 and 35, Ref. NH37 and Pages 36 to 41, Refs. NH39 to NH47 Whilst NH welcomes the Applicant's suggested approach of discussing whether this DCO should reflect the Green Hill position, it must also be acknowledged that each DCO scheme is different in form and impact and therefore a one size fits all approach may not be suitable in the circumstances of a specific proposal. In addition, it should be noted that at the close of the Green Hill Examination, the position in relation to Requirements was agreed as between the Applicant and NH except for Requirement 3. For the Green Hill DCO, NH requested the same change to Requirement 3 as is being sought for this DCO. Discussions for this DCO are on going in this regard.	The Applicant notes this comment and welcomes the ongoing engagement with National Highways on the matter of requirement consultation.
NH4	Page 35, Ref. NH38 NH's concern is wider than the form and layout of means of access covered by Article 14. Given that the details approved pursuant to Requirement 5 could affect highway matters, NH require the ability to approve those details. In addition, without consultation with the highway authority, requirement 5 could result in the planning authority approving details that are	The Applicant does not consider it necessary to amend the drafting of Requirement 5 of Schedule 2 of the draft DCO [APP/3.1.3] in the manner proposed by National Highways. In the first instance, the Applicant notes that the access to the Work Nos. set out in Requirement 5 are not via the Strategic Road Network. Further, the drafting proposed is well-precedented across made solar DCOs, and consultation with the highway authority is already secured in the draft DCO [APP/3.1.3] in relation to relevant matters, such as Article 14(c) (regarding means of access), Article 15(1)(d)(ii) (regarding adoption of certain works), Article 20(4)(a) (regarding trial holes, boreholes and trenches), Article 40(5) (regarding felling or lopping of trees or removal of hedgerows), Requirement 8



Reference Number	Comments	Applicant's Response
	inconsistent with approvals under, for example, article 14. Accordingly the wording in red is required to be inserted into Requirement 5:- No part of *the authorised development* Work Nos. 1, 2 or 3A may commence until details of— (a) the layout; (b) scale; (c) proposed finished ground levels; (d) external appearance; (e) hard surfacing materials; and (f) vehicular and pedestrian access, parking and circulation areas, relating to that part have been submitted and approved by the relevant planning authority and where the details relate highways matters approved by the relevant highway authority for that part. *Works must be carried out in accordance with The Design Manual for Roads and Bridges (DMRB). The Applicant's proposal to update the oCTMP to secure that works are in accordance with DMRB standards is welcomed.	(regarding the detailed Operational Traffic Management Plan), Requirement 15 (regarding the detailed Construction Traffic Management Plan) and Requirement 16 (regarding the detailed Public Right of Way and Permissive Path Management Plan), as is standard practice. Given that the relevant planning authority is entitled to consult with any other organisation if they deem it necessary to do so as part of its approval under Requirement 5, which can include the relevant highway authority, it is unnecessary for the potential for this consultation to be spelt out on the face of the draft DCO [APP/3.1.3] and for standard practice to be departed from. The Applicant notes National Highways' confirmation that the matter of DMRB standards has been satisfactorily addressed via the updated oCTMP [APP/7.7.2] which was submitted at Deadline 1.
NH5	Page 43, Ref. NH51 and Page 46, Ref. NH56 NH welcomes the production of an Outline Travel Plan as part of the updated oCTMP submitted at Deadline 1. NH will review the updated document and liaise with the Applicant if any outstanding issues remain.	The Applicant makes note of this comment and welcomes any comments from National Highways on the oCTMP [APP/7.7.2].
NH6	Page 44, Ref. NH55 NH acknowledges the point made by the Applicant, although it is noted that a car share ratio of 1.4 has been agreed on recent DCOs in the region. NH will review the updated oCTMP. and revert to the Applicant with any outstanding concerns.	The Applicant makes note of this comment and welcomes any comments from National Highways on the oCTMP [APP/7.7.2]. In respect of the car sharing ratio, this is a target and forms part of the targets set out within the Travel Plan included as an appendix to the oCTMP [APP/7.7.2]. The Applicant has also applied this car sharing ratio on a number of its comparable consented solar DCOs, including West Burton Solar Project and Cottam Solar Project, so it is considered appropriate and proportionate to apply this ratio for the Scheme.
NH7	Page 47, Ref. NH59 Noted. NH's main concern is to ensure that AIL's are dealt with through the usual process and that this is secured in the DCO.	The Applicant makes note of this comment and confirms that the requirement to follow the National Highways Abnormal Indivisible Load protocol is secured through the oCTMP [APP/7.7.2] (and therefore in the DCO via the corresponding requirement for the detailed version of this document).



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

Reference Number	Comments	Applicant's Response
Mark Holmes (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-043]		
MH1	Page 1, Intro Paragraph I have now read through Chap.7 - Ecology & Biodiversity (Dated June 2026) and the applicant has FAILED to address most of the issues that I have raised/submitted/asked for action & responses to.	The Applicant notes this comment and has responded to each comment in turn below.
MH2	Page 1, Para. 1 1/ Stop using "Curlew" which does not differentiate between the threatened Eurasian Curlew & the highly protected(Schedule 1)/much rarer Stone Curlew.	The Applicant can confirm that all references to "Curlew" within the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] have been updated at Deadline 3 to specify whether Eurasian Curlew <i>Numenius arquata</i> or Stone-curlew <i>Burhinus oedicnemus</i> is being discussed.
MH3	Page 1, Para. 2 2/ Respond to the 2025 sightings of Stone Curlews, sightings consistent with breeding in the proposed Drovers Solar Farm area. What further licensed survey work is planned for Stone Curlews ? This is especially important as the Drovers Solar site is FUNCTIONALLY LINKED to the nearby Breckland Special Protection Area (SPA). Has the applicant informed Natural England about these 2025 Stone Curlew sightings ?	The Applicant notes that confirmation has been received from Natural England that the information provided is sufficient to conclude that the Scheme would not result in any likely significant adverse effects on the interest features of Breckland SPA (including Stone-curlew). Nonetheless, it is noted (in line with comments from Natural England) that Stone-curlew is a protected species in its own right under Section 1 of the Wildlife and Countryside Act 1981 (in line with all wild bird species), such that any intentional or reckless killing, injury, taking, damage or destruction of nests, obstruction or prevention of access to nests or damage or destruction of eggs would represent an offence. In addition, Stone-curlew is listed on Schedule 1 of that Act (in line with a number of bird species), such that it is also protected from disturbance whilst building a nest, in or near a nest containing eggs or young, or disturbance of dependent young. It is acknowledged that crop rotations will affect the specific locations of any nesting activity within a particular year; however, in view of the size of the Site, varied crops were present (including those suitable for Stone-curlew) during the survey year such that any significant or sustained use of the Site would have been anticipated to be recorded during the surveys undertaken. In line with other bird species, mitigation measures (including timing of works) are set out in the oCEMP [APP/7.6.3], which would prevent any potential offence in regard to Stone-curlew or any other bird species. Natural England has confirmed that the Site does not constitute functionally linked land in relation to Breckland SPA.
MH4	Page 1, Para. 3 3/ Moreover, what complete & in-depth BIODIVERSITY assessment action is being taken about the Drovers site being FUNCTIONALLY LINKED to the Breckland SPA & also also being bordered on its other side by the Nar Valley SSSI ? This is highly relevant to Government targets of biodiversity net gain as well as to Schedule 1 Protected Stone Curlews AND should therefore require wide-ranging HABITAT REGULATION SURVEYS to cover all groups of FAUNA & FLORA.	Natural England has confirmed that the Site does not constitute functionally linked land in relation to Breckland SPA. Natural England stated within their Relevant Representation [RR-038] and the corresponding SoCG with Natural England [APP/5.15.1] that "we concur with the conclusion of the Shadow Habitats Regulations Assessment (SHRA)(APP/7.3) that likely significant effects on European sites can be ruled out, either alone or in combination with other plans or projects and that there is therefore no need to progress to Stage 2 Appropriate Assessment" The Applicant does not, therefore, consider that further Habitats Regulations Assessments are necessary or appropriate for the Scheme (in EIA terms) in relation to these designations.



Reference Number	Comments	Applicant's Response
		Habitats Regulations Assessments represent a specific mechanism under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) relating to the assessment of implications on European Sites and are therefore of relevance only to these designations and would not be appropriate in respect of all groups of fauna and flora. Nonetheless, specific assessment in relation to ecological receptors including fauna and flora is set out within the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2]. Embedded mitigation measures to safeguard the River Nar SSSI, such as specific measures to stop spillages entering the watercourse are secured within the oCEMP [APP/7.6.3]. ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] concludes that, following the implementation of the embedded mitigation and additional mitigation proposed, there will be no likely significant effects (in EIA terms). As set out within the Biodiversity Net Gain Assessment Report [REP1-048], using the government's own metric, the Scheme will deliver a BNG substantially in excess of 10%, and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
MH5	Page 1, Para. 4 4/ Re. Mammals - there is no reference to Priority species like Harvest Mice nor to Protected Priority species like Polecats (a more recent biodiversity gain to the area). How is this going to be addressed ?	These species are assessed within the 'Other Mammals' sections within the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], which concludes no significant adverse effects are anticipated as a result of the construction, operational, or decommissioning phases of the Scheme.
MH6	Page 1, Para. 5 5/ I am dismayed by the lack of reference to Insect Biodiversity (the Brecks are internationally important for their insect biodiversity). What survey work will be done to look at Butterflies, Solitary Bees, Beetles and other insect groups ? So to reiterate biodiversity survey work has been inadequate to date. Can the applicant please show that they are serious about fully assessing Ecology & Biodiversity, and give me the courtesy of addressing my previous submissions & the above actions/questions ?	The Applicant notes the comments in regard to the presence of invertebrate species within the Order limits (as would be anticipated on any area of land of similar scale) and offsite within the wider Brecks area, which are outside of the Order limits and will remain unaffected. ES Appendix 7.2: Baseline Ecological Survey Report [APP-148] details the results of survey work undertaken at the Site, which confirms the presence of a number of invertebrate species at the Site, including some of those listed, where suitable habitats are present (albeit noting that much of the Site, including the majority of the affected areas) is dominated by intensive arable land with key features offering habitats for the majority of invertebrate species restricted to field boundary habitats, hedgerows, woodlands and associated vegetation which will be retained and enhanced. Key habitats such as hedgerows, woodlands and trees will be retained and ecological safeguarding measures, such as appropriate buffers, are set out within the oCEMP [APP/7.6.3] to safeguard and avoid adverse impacts, which in turn will ensure available habitats and corridors remain for use by the faunal species listed. Ongoing management and monitoring measures are set out within the oLEMP [APP/7.11.2] which will ensure long term habitats and enhancements for a range of species including invertebrates, whilst proposed mitigation and compensation measures in respect of faunal species have been specifically considered within the ES Chapter 7: Ecology and Biodiversity [APP/6.2.2], which concludes no significant effects are anticipated. In respect of the final sentence of the comment, the Applicant assures the Interested Party that it has, and will continue to, respond to all submissions made in the examination.
Antony Morgan (Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2) [REP2-042]		
AM1	Page 1, Paras. 2.1 and 2.2 <i>Land Use and Degradation of Agricultural Land</i> The applicant proposes to utilize approximately 825 hectares of land, a substantial portion of which constitutes Best and Most Versatile (BMV) agricultural land. Questions for the Applicant:	The Order limits have been surveyed at detailed level, and the ALC grading has been determined. This provides "granular, field-by-field data" of the location of BMV and non-BMV land. This is described in ES Chapter 11: Soils and Agriculture [AS-018] and ES Appendix 11.2: Agricultural Land Classification [APP-168]. As described in the ES, only a small proportion of the land will be affected by soil movement, and most is fully reversible such that only a small amount of BMV land is lost to the National Grid Substation or for tree planting. This granular, field-by-field data was used in the design process. In accordance with the Project Principles the Applicant has considered BMV within the design evolution of the Scheme and has removed Field 32, classified as



Reference Number	Comments	Applicant's Response
	- What highly granular, field-by-field soil data justifies the industrialization of BMV land over alternative brownfield or lower-grade sites within the region? - What is the precise, calculated cumulative loss in domestic food production volume over the project's multi-decade operational lifespan?	a mix of Grades 1 and 2 agricultural land from the Scheme, as described in Section 6 of the Design Approach Document [AS-009 - AS-011]. As set out in the Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072], the majority of Norfolk is predicted to be of BMV quality. Poorer quality land is generally not available. There is no policy requiring agricultural land to be used for food production. The effects in terms of the relative benefits, and absolute production, of BMV land and non-BMV land are set out in ES Chapter 11: Soils and Agriculture [AS-018].
AM2	Pages 1 and 2, Paras. 3.1 and 3.2 <i>Battery Energy Storage System (BESS) Efficiency and Alternatives</i> The co-located BESS infrastructure introduces considerable land use footprint and technical constraints. Lithium Iron Phosphate (LFP) chemistry limits effective cycling to roughly once per day and degrades rapidly if sustained at full state-of-charge (SoC). Questions for the Applicant: - Given the operational constraints of lithium iron chemistry—including the daily cycling limit and degradation risks when held at maximum capacity—how can the applicant justify tying this massive storage system strictly to intermittent co-located solar generation? - Would it not be far more efficient and less damaging to the local landscape to eliminate the solar array entirely, deploying a standalone BESS elsewhere to charge directly from the grid during existing low-demand periods?	The delivery of any solar and/or BESS development will result in a degree of landscape and visual effects. The co-location of renewables infrastructure is encouraged under paragraph 2.5.2 of NPS EN-3 (2023) which states: <i>"Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses..."</i> Paragraph 2.10.10 of NPS EN-3 (2023) further notes that: <i>"...the government is supportive of solar that is "co-located" with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use."</i> The Applicant therefore considers that it is more efficient and less damaging to the landscape and visual effects if the National Grid Substation, Customer Substation, BESS and solar PV infrastructure is co-located, as encouraged within NPS EN-3 (2023). Section 6.9 of the Statement of Need [APP-042] provides information on how the proposed co-located BESS and solar may work together. The Statement of Need [APP-042] explains that the BESS will support the operation of the principal solar site. However, at times when the BESS is not supporting the operation of the principal solar site, it may be useful for the BESS to support the national supply and demand balance by importing directly from the grid rather than from the co-located solar. The Applicant aims to generate a substantial quantity of reliable and secure low-carbon energy from the Scheme, to help meet the anticipated increase in demand associated with decarbonisation of sectors such as transport, heat and industrial demand. This is the principal benefit of the Scheme and derives from the main solar site. A standalone BESS development would provide benefits to the energy system, but would not generate low-carbon electricity on its own. Standalone BESS facilities, on their own, are not able to meet the anticipated increase in total demand, and so cannot fully replace the need for new generating capacity (c.f. NPS EN-1 (2025) paragraph 3.3.6 and NPS EN-1 (2023) paragraph 3.3.6. Deploying a standalone BESS elsewhere would not, therefore, enable the Applicant to meet its aims or support the Government to meet its objectives for the energy system as set out in paragraph 2.3.3 of both NPS EN-1 (2025) and NPS EN-1 (2023). The proposed BESS has been assessed as part of the overall DCO Application within Section 6.6 of ES Chapter 6: Landscape and Visual [AS-016]. The proposed BESS location is generally contained within the local framework of hedges, tree shelterbelts and woodland. Within ES Chapter 6: Landscape and Visual [AS-016], the effects on the host LCA within the Site itself are considered to be Moderate Adverse and Significant in the short-term due to the change to the physical change to the characteristics of the Site. In the long term, the effects would be Moderate Adverse and Not Significant once the mitigation planting has established. In the wider context, the impacts on landscape character would be Not Significant due to limited visual influence of the BESS and co-location with the existing pylons and transmission lines as well as the proposed Customer Substation and National Grid Substation. These impacts on landscape character are considered fairly typical for a proposed BESS in a rural location.



Reference Number	Comments	Applicant's Response
AM3	Page 2, Paras. 4.1 and 4.2 <i>Regional Over-Supply and NESO Grid Constraints (Gate 2)</i> The necessity of a 500MWac generation asset in this specific region is highly questionable. The local distribution and transmission network boundaries (specifically the Network S6 and S7 boundaries) are heavily saturated with existing and pipeline energy generation assets. Questions for the Applicant: • Is it not the case that the local Network S6 and S7 regional transmission zones are already heavily oversupplied with electricity? • Can the applicant confirm if NESO (National Energy System Operator) has withheld or delayed a formal “Gate 2” connection agreement for this project precisely because the regional grid infrastructure lacks the capacity to absorb this surplus power? • If the regional network cannot accept this electricity without massive, unconfirmed infrastructure reinforcements, what immediate “need” does this project serve under national planning policy?	In response to the first bullet point, the Applicant assumes that this representation refers to the ‘Central England’ (T6) and ‘E. Anglia’ (T7) transmission network region for the purposes of the regional capacity breakdown included in the Clean Power 2030 Action Plan. Section 2.9 of the Statement of Need [APP-042] describes the Government’s Clean Power 2030 Action Plan. The Plan explains that “by 2050, annual electricity demand is likely to at least double. Clean power by 2030 prepares us for the rapid growth in power demand expected over the 2030s and 40s.” Section 4.3 of the Statement of Need [APP-042] explains that over one third of UK-based electricity generation in 2024 was from unabated fossil fuel sources. Renewable capacity must grow to displace the majority of unabated generation from the grid to meet the Clean Power target (see Paragraph 2.9.7 of the Statement of Need [APP-042]), before growing again to meet anticipated future demand. It is not the case that the transmission networks close to the Site are already heavily oversupplied with electricity, as the representation suggests. In response to the second bullet point, the Applicant understands that NESO applied open and consistent criteria to the connections queue in its re-prioritisation process. The Applicant refers its Response to section 89(3) letter dated 17 March 2026 [AS-063] in which it describes the chronology of its grid connection offer with NESO, including that in 2022, the Applicant was advised by NGET to apply for, and subsequently connect, directly onto the overhead line (OHL) running between the King’s Lynn and Necton substations, indicating that available transmission capacity in the lines could be used by a solar scheme of the scale proposed. In response to the third bullet point, the Clean Power 2030 Action Plan seeks to “prioritise projects needed for 2030, while maintain[ing] a robust pipeline [of projects] beyond 2030” (page 11). NPS EN-1 (2025), which was updated to align with the Clean Power 2030 Action Plan, confirms at paragraph 3.2.6 that “it is not the government’s intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types.” It is clear, therefore, that the need established in the NPSs applies equally to projects which are coming forward with early connection dates as well as projects which are coming forward for later connection to support the ‘robust pipeline’ described in the Clean Power 2030 Action Plan. In further response to the second and third bullet points, the Applicant also refers to Applicant's Response to Written Representations and other Deadline 1 Submissions [REP2-028] specifically references NGET1 to NGET10, on these matters.
AM4	Pages 2 and 3, Paras. 5.1 to 5.3 <i>National Security and Aviation Safety (Glint & Glare)</i> I note with grave concern the formal objection submitted by the Ministry of Defence (MOD) during the Examination process regarding the potential glint and glare impacts arising from the proposed development and the implications for operations at RAF Marham. The continued existence of a substantive MOD objection should be afforded significant weight by the Examining Authority. Aviation safety and operational effectiveness at RAF Marham are matters of national importance and should be fully resolved before any recommendation is made. Questions for the Applicant: • How can the Applicant demonstrate, with a high degree of certainty, that pilot visibility, mission planning, training activities, sensor systems and operational capability at RAF	The Applicant notes the comments posed and confirms that it is continuing to engage with the MOD with regard to the outstanding issues and expects to reach an agreed position on these matters. The Applicant currently awaits a response from the MOD on these matters. The Applicant has conducted analysis of glint and glare impacts upon RAF Marham in the ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176]. This assessment identified that glare would be possible and engagement is ongoing with the MOD to determine if a Glint and Glare Management Plan (GGMP) may be required to establish procedures for the investigation/mitigation of any impacts which present in practice. Similar plans have been adopted for other developments in the vicinity of military and civil aerodromes, where a comparable or greater intensity and duration of glare has been predicted. A GGMP was implemented for Scruton Solar Farm, in the vicinity of RAF Leeming and the Applicant is also aware of GGMPs which have been implemented for solar farms in the vicinity of Cardiff Airport and Norwich Airport. This is therefore a reliable and deliverable mechanism for safeguarding the operational requirements of aerodromes from significant glint and glare impacts. The Applicant has not currently set out any specific mitigation measures, as these may be informed by other considerations or the MOD’s requirements. In other instances, measures have included software algorithms for tracking panels (to ensure that panels are oriented in a direction where glare is not geometrically possible at certain



Reference Number	Comments	Applicant's Response
	Marham will not be adversely affected by direct or secondary glare from the proposed solar arrays? - What evidence exists from operational solar installations of a comparable scale demonstrating that glint and glare effects can be reliably eliminated in circumstances similar to those at RAF Marham? - What specific mitigation measures are proposed, and what independently verified evidence demonstrates that such measures would be effective throughout the operational life of the project? - If residual impacts remain after mitigation, how does the Applicant consider the proposal to be compliant with the relevant requirements of the National Policy Statements regarding aviation safety and national security interests? I respectfully request that the Examining Authority require the Applicant to respond directly to the concerns raised by the Ministry of Defence and clearly demonstrate how those concerns have been resolved. If the objection remains outstanding, I submit that significant weight should be attached to that fact when assessing the application.	times) and panel reorientation for fixed layouts. The Applicant will provide details of these mitigation measures, if necessary, once they are agreed with the MOD. The purpose of ongoing discussions with the MOD, and any development of a management plan or additional mitigation which may be proposed, is to ensure that there would be no residual impact on the operations of RAF Marham or wider national security interests, in line with the requirements of the National Policy Statements.
AM5	Page 3, Paras. 6.1 to 6.3 <i>Heritage, Visual Landscape, and Dark Skies</i> I am concerned that the scale of the proposed 500MWac development has the potential to affect the rural landscape character of the area and the setting of designated heritage assets, including Castle Acre Castle and Priory. The setting and significance of these heritage assets are matters to which the Examining Authority must have regard under the National Planning Policy Framework and NPS EN-1, and any harm to their setting should be clearly identified, justified and weighed in the planning balance. Questions for the Applicant: - What heritage impact assessment has been undertaken in respect of Castle Acre Castle and Priory, and what conclusions does it reach regarding the effect of the proposed development on their setting and significance? - What specific mitigation measures are proposed to address any identified landscape and visual effects, and what evidence demonstrates that these measures will remain effective over the lifetime of the project? [point 3 is responded to separately below]	The potential impacts of the Scheme upon the significance of Castle Acre Castle and Priory (along with other heritage assets in the area) are presented in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] which is informed by ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] concludes that a worst case for impacts upon both Castle Acre Priory and Castle would be a Low/Negligible magnitude impact resulting in a Minor Adverse effect. With regards to bullet point two, the potential adverse effects identified within ES Chapter 6: Landscape and Visual [AS-016] take account of various embedded mitigation measures to limit the effects. These mitigation measures are secured by the Design Principles, Parameters and Commitments [APP/5.8.3], the spatial extents shown on the Works Plan [APP/2.3.1], the oOEMP [APP/7.8.3] and the oLEMP [APP/7.11.2]. The specific landscape and visual mitigation measures include: - Retention of the majority of existing landscape features within and along the boundaries of the Site, namely mature hedges and tree shelterbelts which contribute to local character and distinctiveness. These landscape features serve to restrict, filter and enclose visibility within the Site and Study Area to the south of Bartholomew's Hills Plantation. Whilst there would be some loss of existing vegetation to allow for the proposed Grid Connection Infrastructure and for internal field access points, this would be compensated for by further planting. The potential hedge loss will be minimal and the proposed additional planting will exceed those losses. The Biodiversity Net Gain Assessment Report [REP1-048] undertaken by the Applicant notes that that will be an overall 9.37km increase in hedgerow length across the Site - Offsetting and buffering of the Scheme with new tree, hedge and woodland planting to mitigate potential views from the nearby PRoW, roads and residential dwellings both within and in close proximity to the Site



Reference Number	Comments	Applicant's Response
	[point 4 is responded to separately below]	- Retention, 'gapping up' and enhancement of existing hedges within the Site. Proposed planting species would be native and include a mixture of deciduous and evergreen species to provide year-round screening. The design intends to provide a balance between open and enclosed views as historically found along the drove routes. The design also proposes to retain the sense of openness and visual connectivity to the north of South Acre RB2 across the Nar Valley to the north of the Site - The long-term management and maintenance of existing and new vegetation is an embedded mitigation measure as detailed within the oLEMP [APP/7.11.2]. The hedges would be maintained at 3m height as an embedded mitigation measure to screen views towards taller elements of the Scheme from nearby PRoW. The active management and maintenance of trees, hedges and woodland will ensure they reach maturity in the long term. In turn, this vegetation will screen and filter views towards the Scheme from nearby PRoW, roads and residential dwellings - Setting back the Scheme from key landscape features within and adjacent to the Site, such as from trees, hedges, woodland and the drove routes. Minimum offsets and buffers from existing landscape features are secured within the Design Principles, Parameters and Commitments [APP/5.8.3]. The Scheme would generally be offset from the existing PRoW by a minimum distance of 15 metres and from the Fincham and Petitcoat Drovers by a minimum distance of 25m, as secured by the Works Plan [APP/2.3.1] to reduce any visual channelling effects and to provide wide field margins for wildflowers and grassland. New wildflower and grassland areas are also proposed to be sown underneath the Solar PV Arrays which would enhance conditions for pollinators; and - As referred to within the oLEMP [APP/7.11.2], recreational and educational enhancements are proposed such as interpretation boards and the potential for a new publicly accessible amenity space within the north-western area connected to the existing PRoW network and the Nar Valley recreational routes. In addition, a number of permissive routes are proposed, equating to approximately 3.5km in length, which would link to the existing PRoW network to offer enhanced connectivity.
AM6	Page 3, Para. 6.3 <i>Heritage, Visual Landscape, and Dark Skies</i> What measures are proposed to limit light pollution from the substations and Battery Energy Storage Systems (BESS), and what monitoring or enforcement mechanisms would ensure these measures are adhered to throughout the operational life of the site?	Night-time impacts are further assessed in paragraph 6.7.23 of ES Chapter 6: Landscape and Visual [AS-016] which notes that the Scheme would not result in any significant effects through additional lighting. Mitigation of potential light pollution and spill would be addressed through the relevant commitments set out in the Design Principles, Parameters and Commitments [APP/5.8.3] and oCEMP [APP/7.6.3]. The Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation and the BESS compound, which would only include motion sensing lighting and would be used to maintain safe working conditions in the winter months, for security purposes, and for maintenance activities as secured within the oOEMP [APP/7.8.3] and explained in ES Chapter 5: The Scheme [REP1-032]. Monitoring and reporting will be undertaken for the duration of the operational phase to demonstrate the effectiveness of the measures set out in the detailed management plans and related operational controls and allow for corrective action to be taken where necessary. This is secured within the oOEMP [APP/7.8.3] which is the mechanism through which the Applicant would be required to review and enforce these measures itself. As a very last resort, non-compliance with the requirements of the DCO are legally enforceable and can result in enforcement action from the relevant authority.
AM7	Page 3, Para. 6.3 <i>Heritage, Visual Landscape, and Dark Skies</i> What evidence supports the Applicant's position that the proposed habitat mitigation for avian species would deliver a	As set out within the Biodiversity Net Gain Assessment Report [REP1-048], the Scheme will deliver a BNG substantially in excess of 10%, and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme. The BNG Assessment was undertaken using the government's (statutory) BNG metric, which specifically compares the calculated biodiversity value of the proposed habitats with the existing habitats, to provide a measurable change in biodiversity and therefore clearly



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	measurable ecological net gain, and how does this compare with the ecological value of the existing, undisturbed habitat?	demonstrates in line with government guidance that the proposed habitats will deliver measurable ecological net gains.
AM8	Pages 3 and 4, Paras. 7.1 to 7.3 <i>Cumulative Regional Impacts</i> I am concerned that this proposal falls to be considered alongside a number of other existing, consented and proposed solar and grid infrastructure projects across West and South Norfolk, and that the cumulative effects of these projects on the local community have not yet been fully demonstrated. and that the cumulative effects of these projects on the local community have not yet been fully demonstrated. NPS EN-1 requires that the cumulative effects of a proposed development, taken together with other relevant projects, are properly assessed. This is particularly important in this case given the concentration of energy infrastructure proposals within the wider region. Questions for the Applicant: - What methodology has been used to assess the cumulative effects of this proposal alongside other existing, consented and proposed energy infrastructure projects in the region, and which specific projects have been included in that assessment? [points 2, 3 and 4 are responded to separately below]	The Applicant has responded to matters regarding the cumulative assessment methodology within Applicant's Response to Relevant Representations [REP1-067], which sets out that the assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and the Planning Inspectorate's Advice Note on Cumulative Effects Assessment. The Applicant has submitted at Deadline 3 an updated long list and short list of cumulative developments within ES Appendix 2.4: Cumulative Schemes [APP/6.4.1], which also includes details on the cumulative assessment methodology. The Planning Inspectorate's Advice Note on Cumulative Effects Assessment recognizes that there will be a varying levels detail available depending on the stage of any cumulative development and that the cumulative assessment should be undertaken at a level of detail proportionate to the information available. The Applicant has sought agreement on the list of cumulative schemes with the local authorities. The Applicant will also, in accordance with best practice, keep the cumulative list under review throughout the course of the examination to ensure that it is up to date. The assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations³ and the Planning Inspectorate's advice note on Cumulative Effects Assessment^{3F4}. The approach to cumulative assessment is detailed in ES Chapter 2: EIA Process and Methodology [APP-051] and ES Appendix 2.4: Cumulative Schemes [APP/6.4.1]. The cumulative assessments within each of the technical topic chapters have been undertaken in accordance with the relevant topic specific guidance and best practice approach, assessing a reasonable worst-case scenario.
AM9	Page 4, Para. 7.3 <i>Cumulative Regional Impacts</i> What evidence has the Applicant provided regarding the combined impact of these projects on the local rural road network, including construction traffic and any necessary highway improvements?	The assessment of cumulative traffic impacts of the Scheme is presented in ES Chapter 9: Transport and Access [REP1-036], which has concluded no significant cumulative effects on the transport network. The approach to the cumulative assessment has been agreed with Norfolk County Council within the Applicant's Response to Local Impact Reports [REP2-027] who have raised no objections to the methodology or the conclusions of the assessments. The routing for construction and operational traffic is secured through the oCTMP [APP/7.7.2] and the oOTMP [APP/7.9.2] and will ensure that vehicles only use the designated routes via the A1065, from the Strategic Road Network (SRN) and the A47, and do not impact the local rural road network. Both the oCTMP [APP/7.7.2] and the oOTMP [APP/7.9.2] set out the required mitigation strategy for both the construction and operational phases respectively to ensure that the effects of the Scheme remain not significant and so no further highway improvements are required, above the upgrade of the Scheme access points and temporary improvements to facilitate the AIL Deliveries as detailed within the ES Appendix 9.2: Traffic Assessment [APP-163].
AM10	Page 4, Para. 7.3 <i>Cumulative Regional Impacts</i>	The Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072], in Section 5, considers a much wider potential cumulative impact from other development within Breckland, King's Lynn and West Norfolk Council areas and from NSIP and development allocations across

³ HM Government, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

⁴ Planning Inspectorate, Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (September 2024)



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	What assessment has been undertaken of the cumulative effect of multiple projects on soil condition and long-term agricultural productivity across the wider area?	Norfolk. The Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072] considers the cumulative effect including of other NSIP solar projects (High Grove and East Pye), other solar farms (Boulton Solar, Palgrave Road Solar), the A47 road improvements, the Grantham to Bexwell Pipeline, and proposed housing allocations across Norfolk. The cumulative effect of Scheme, High Grove and East Pye proposals will involve 3,510 ha of agricultural land. This represents 0.840% of the total area on agricultural holdings in Norfolk. This is the land use figure – land loss is very small. The proposed land loss due to proposed permanent development for housing or industry, from information provided with the applications or using the Predictive Map for England, over 500 ha of BMV land is predicted will be lost. The details are provided in Attachment B and mapped at Attachment C of the Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]. The Scheme represents 0.8% of the total area on agricultural holdings within Breckland (see paragraph 5.5 of Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]). The wider implications are described at section 11.8 of ES Chapter 11: Soils and Agriculture [AS-018], including theoretical production and economic effects.
AM11	Page 4, Para. 7.3 <i>Cumulative Regional Impacts</i> What consideration has been given to the cumulative effect of this scale of development on community identity and the lived experience of residents in the surrounding area?	The effect on community identity, culture, resilience and influence was scoped out of the Human Health assessment. This approach was agreed by PINS at the scoping stage, on the basis that the Scheme is not likely to give rise to significant effects in EIA terms. It was therefore not considered cumulatively. ES Appendix 2.1: EIA Scoping Opinion Request [APP-133] sets out the justification for this position, including the temporary and managed nature of construction effects and the absence of disruption to community assets or activities during operation. ES Appendix 2.2: Scoping Opinion Response [APP-134] confirms PINS' agreement with this approach, noting that with embedded mitigation in place, significant effects are not anticipated.
AM12	Page 4, Para. 7.4 <i>Cumulative Regional Impacts</i> I respectfully request that the Examining Authority require the Applicant to provide a clear, evidence-based cumulative effects assessment addressing these matters, and to give appropriate weight to any cumulative harm that has not been adequately assessed or mitigated.	The Applicant refers to its responses at AM8 – AM11 above.
AM13	Page 5, Paras. 8.4 to 8.7 <i>Conclusion</i> While I recognise the distinct regulatory and commercial pathways for nuclear and solar technologies within the UK planning framework, I urge the Examining Authority to weigh the scale of land-take required by this 825-hectare proposal against the comparatively minimal spatial footprint of equivalent clean baseload alternatives, such as Small Modular Reactors, when considering the overall planning balance. I further request that the Examining Authority give careful consideration to the evidence submitted by statutory consultees, including the Ministry of Defence, and require the Applicant to	The Applicant refers to their previous response at AM9 and AM18 of Applicant's Response to Written Representations and other Deadline 1 Submissions [REP2-028] which explains how the Statement of Need [APP-042] demonstrates that in line with the government's Clean Power capacity ranges, different types of low-carbon technologies are needed to play their part to achieve Net Zero. Therefore, the potential for new capacities of other technologies in this or other locations cannot be considered as credible alternative approaches to deliver carbon reductions, because any such capacities are likely also to be needed. The Applicant is a solar developer, and the Scheme is a large-scale solar scheme. Further, Section 5.6 of the Statement of Need [APP-042] discusses nuclear power in Great Britain, and explains that “although SMRs are considered to be quicker and cheaper to deploy than larger scale reactors, they are currently untested in construction, commercial deployment or operation. It is therefore not yet the case that the existence of a governmental plan for nuclear, and companies currently participating in that plan, can be relied upon to deliver the potential benefits of such a plan”. Relying on Small Modular Reactors (see Section 5.6 of the Statement of Need [APP-042] for more information) rather than progressing with developments for proven technologies is not consistent with the Government's prudent approach to “to plan on a conservative basis to



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	respond directly to any unresolved concerns raised during the Examination. Where objections or concerns remain outstanding, particularly those relating to aviation safety, national security, heritage protection, agricultural land use, grid capacity and cumulative impacts, I submit that the burden of proof rests with the Applicant to demonstrate compliance with the relevant provisions of the National Policy Statements. Until these matters have been fully examined and evidenced, I consider that the application has not yet demonstrated that its adverse impacts have been adequately understood, mitigated or justified. I therefore respectfully request that the Examining Authority apply rigorous scrutiny to the Applicant's case and ensure that the requirements of the relevant National Policy Statements are demonstrably satisfied before reaching any recommendation.	<i>ensure that there is sufficient supply of electricity to meet demand across a wide range of future scenarios"</i> (NPS EN-1 (2023), Paragraph 3.3.10). The Applicant continues to engage with the MOD regarding the potential mitigation solutions to resolve the potential impacts to radar and aviation receptors. The Applicant is working through potential mitigation options with the MOD which will be confirmed at a future deadline. Following this process, a review of the potential for any likely significant effects will be undertaken and, if necessary, further assessment will be undertaken. This would include, as appropriate and necessary, consideration of landscape and visual, biodiversity, land use, and interactions between topics (in-combination effects). The Policy Compliance Document [REP1-014] demonstrates the Scheme's compliance with the relevant NPSs. Having regard to all important and relevant matters, the Applicant concludes in the Planning Statement [REP1-012] that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO Application should not be consented. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1 (2023).
Francis Fitzpatrick (Additional Submission accepted at the discretion of the Examining Authority) [AS-065]		
FF1	Page 1, Para. 2 'Castle Acre is a village of significant historical and cultural importance. There has been in recent years a great deal of development both around Swaffham and Castle Acre with the building of a significant number of infrastructure and homes. This has had an impact on the setting of Castle Acre and there is likely to be further such development. The addition of the proposed solar farm will have a very significant, if not catastrophic, impact on the setting and will turn the area between Swaffham and Castle Acre into something equivalent to an industrial park. The huge amount of construction traffic, noise and light pollution that will no doubt continue beyond the completion of the works will be an ongoing problem for Castle Acre and its residents. It will also plainly adversely impact an area of Dark Skies with site light pollution at night.	The impacts of the Scheme are presented within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. The bulk of the Order limits that will be subject to change are not considered to make any contribution to the significance of the identified heritage assets due to the lack of shared experience between the plateau land and the heritage assets which is a prerequisite for contribution to significance. Large tracts of agricultural land lie between the Order limits and the assets and the understanding and context of these assets will, therefore, remain to be clearly appreciated. Construction traffic has been routed to avoid passing designated heritage assets where possible as detailed within oCTMP [APP/7.7.2] and no significant impacts upon cultural heritage are identified in connection with construction, operational or decommissioning traffic. Potential impacts from noise are presented in detail within ES Chapter 10: Noise and Vibration [APP/6.2.1] and are assessed in relation to heritage assets within ES Chapter 8: Cultural Heritage and Archaeology [APP-057]. No significant impact from noise upon cultural heritage has been identified. ES Chapter 6: Landscape and Visual [AS-016] concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area, including those within Castle Acre. The Scheme would be readily identifiable as renewables infrastructure and not as an industrial park as suggested within comment FF1. With regards to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order limits. With regards to visual amenity, the construction and decommissioning phases would be partially visible from VRG 5: Castle Acre. Visibility would mainly be associated with the Grid Connection Infrastructure being constructed and visible upon the skyline alongside existing pylons. There would also be glimpsed views of construction and decommissioning of Solar PV Arrays; however, this element of the Scheme would be less prominent than the Grid Connection Infrastructure for this VRG. There would be very limited to no visibility of construction activity associated with the National Grid Substation and Customer Substation due to the screening effect of Bartholomew's Hills Plantation and other tree and woodland blocks within the Site and study area. Short term visual effects on this receptor group would be medium-small scale over an intermediate extent of the receptor



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		group. These effects would be medium-low magnitude, Moderate significance and Adverse. This effect is not significant and temporary. The Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation and within the BESS compound, which would only include motion sensing lighting and be used to maintain safe working conditions in winter months, security purposes, and maintenance activities as secured within the oOEMP [APP/7.8.3] and explained in ES Chapter 5: The Scheme [REP1-032]. Lighting matters are addressed through the relevant commitments set out in the Design Principles, Parameters and Commitments [APP/5.8.3] and oCEMP [APP/7.6.3].
FF2	Page 1, Para 3 The proposed development impacts a nationally significant path, the Peddars Way and will lead to a very large amount of prime agricultural land being taken out of production for the foreseeable future at a time when food production is of critical importance.	The effects of the Scheme on local agriculture, and on the wider regional and national agricultural industry and food production, are assessed in ES Chapter 11: Soils and Agriculture [AS-018] and are concluded to be negligible. The land will not necessarily be taken out of production, as there is the potential for the land under and around the panels to be grazed by sheep. ES Chapter 6: Landscape and Visual [AS-016] identifies a Moderate Adverse and Significant effect on the Peddars Way recreational trail within the Site and up to approximately 300m from the Site in the short and medium term. The Peddars Way trail crosses the Order limits to the north-east following and existing rural. Fields 35, 36 and 37 comprise a skylark mitigation area and would not contain solar PV arrays. In the long term, the visual effects on the Peddars Way would be Moderate Adverse and Not Significant once field boundary hedges and proposed trees have matured to provide additional visual screening. The majority of the Peddars Way recreational trail beyond 300m from the Site would remain unaffected by the Scheme. Current food security levels in the UK are stable, as assessed in ES Chapter 11: Soils and Agriculture [AS-018] at paragraph 11.8.99 et seq. There is no requirement to use agricultural land for food production, nor to any productive intensity. Land use and planning policy does not recognise nor require any optimal or food production use. It is noted in ES Chapter 11: Soils and Agriculture [AS-018] (at paragraph 11.8.100) that in June 2025 some 444,000 of arable land was in non-food producing agri-environmental uses.
FF3	Page 1, Para. 4 This area already makes a significant contribution to reducing its carbon footprint as there are a number of wind turbines nearby and a widespread adoption of solar panels and heat pumps by many residents in the surrounding area as a result of initiatives funded by the government. It would surely be a better use of resources to continue to promote and assist the adoption of solar panels by residents rather than imposing a gargantuan development entirely inappropriate to the area and opposed by residents.	The Statement of Need [APP-042] describes that an unprecedented capacity of new low-carbon generation schemes is required to come forward to help achieve Net Zero. The Clean Power 2030 Action Plan, which is summarised in Section 2.9 of the Statement of Need [APP-042], established challenging capacity ranges for all low-carbon generation technologies to guide deliver to and beyond 2030. All areas of Great Britain will be required to play their part in achieving Net Zero. Section 7.7 of the Statement of Need [APP-042] describes that a large-scale solar development connecting into the existing overhead line between Necton and Walpole provides the potential to help decarbonise electricity demand to the benefit of consumers both locally and nationally. The Applicant is supportive of the continued development of rooftop solar; however, the Applicant agrees with the Government's view that rooftop solar is needed in addition to, but not instead of, large-scale ground mount solar, because without increasing capacities of solar generation at both scales, the UK will likely fall short of its solar capacity aims and therefore its climate change targets.
FF4	Page 1, Para. 5 In short this proposal is simply disproportionate to the area and setting. It is opposed by local parish councils and residents. There is no local support. Granting permission for such an unsuitable	The Statement of Need [APP-042] and Planning Statement [REP1-012], submitted in support of the DCO Application, set out the justification for the Scheme and its proposed scale within the context of the clear and urgent national need for low-carbon energy generation. The potentially adverse effects identified within ES Chapter 6: Landscape and Visual [AS-016] take account of various mitigation measures embedded within the Scheme, which were designed to limit potentially adverse effects upon the landscape and visual amenity. The process



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	development would make a nonsense of local democracy and lead to the loss of an area of outstanding natural and historical importance. '	undertaken by the Applicant for its community consultation and engagement is outlined in full within the Consultation Report [APP-025] . The Applicant is confident in the approach taken to consultation and that this has been done in accordance with the SoCC as consulted upon with the local authorities outlined in Consultation Report Appendix B: Preparation of the SoCC [APP-030] . As outlined within the Consultation Report [APP-025] in Figure 9, there were 15% of respondents who responded with either "supportive" or "supportive, but I have some concerns" when asked " <i>Based on the consultation materials, how supportive are you of the proposals presented for The Drovers Solar Farm?</i> ". Further, and as noted within Applicant's Response to Relevant Representations [REP1-067] , representations made by the following Interested Parties submitted comments of support for the Scheme: RR-001, RR-033, RR-012, RR-042, RR-004, RR-024, RR-048, RR-039, RR-047, RR-034, RR-046, RR-032 and RR-027.



THE DROVES
SOLAR FARM