

BRECKLAND DISTRICT COUNCIL

The Drovers Solar Farm (EN0110013)

Standalone Submission Following Issue Specific Hearing 3

Deadline 4 – 16th September 2026

1.0 Introduction

1.1 This document provides Breckland District Council's ("the Council") summary and clarification of its principal landscape and visual submissions following Issue Specific Hearing 3 (ISH3) on 9th September 2026.

1.2 The responses should be read alongside:

- The Council's Relevant Representations (RR)
- The Council's Local Impact Report (LIR)
- The evolving Statement of Common Ground (SoCG) with the Applicant
- The Council's responses to the Examining Authority's First and Second Written Questions (ExQ1 and ExQ2)

1.3 The Council acknowledges the progress made during the Examination. However, in considering the Applicant's responses during the Hearing, the Council considers it necessary to submit additional fundamental concerns in writing, regarding the effects on open views from the A1065 and the limited certainty available in respect of potential aviation mitigation for RAF Marham. Please refer to the Statement of Common Ground submitted at Deadline 4 for a full summary of the remaining unresolved issues between the Council and the Applicant.

2.0 Views from the A1065

2.1 The Council maintains that the landscape and visual effects experienced from the A1065 have been underplayed. This section of the road provides views across an open rural landscape, and the Council considers that the Proposed Development would result in a notable adverse change to the character and experience of those views. Sporle Parish Council also raised notable concerns regarding Viewpoint Group 4 (elevated land to the east of the A1065) about the extent of the Proposed Development that would be visible, as well as the potential for cumulative views including with High Grove Solar Farm.

2.2 At ISH3, the Applicant maintained visual effects experienced by those travelling along the A1065 would be 'slight-minimal' in the long term and described the existing views as "gappy". It maintained that those views are transitory and fleeting. The Council does not agree with that conclusion. The open views across the landscape are experienced in several places and the traveller experience,

whether walking or in a moving vehicle, is one of openness, views, and the “big skies” and landscape that characterises Norfolk. Whilst proposed planting may reduce the visibility of solar infrastructure over time, it would not preserve the existing openness and expansive nature of the landscape. The introduction of screening vegetation would itself contribute to a more enclosed landscape character. Screening the development and retaining the existing sense of openness are not equivalent outcomes.

- 2.3 The Council therefore asks the Examining Authority to form its own judgement on the nature and value of the views available from this section of the A1065, informed by the written evidence and its site visit.

3.0 Aviation Mitigation and Landscape Effects

- 3.1 At ISH3, potential mitigation of effects on RAF Marham’s Precision Approach Radar was described as possibly comprising bunds, fencing or a combination of measures, potentially up to 4.5 metres in height. It was also indicated that this mitigation could affect several fields in the western part of the Order Limits. However, the final form, height, location and extent of the mitigation have not been confirmed, with the DIO unable to confirm if 4.5m would be sufficient. The plan referred to during the hearing has not yet been made available to the Council for detailed consideration.
- 3.2 The Applicant stated that should 4.5m be insufficient, the relevant solar panels would not be installed. As such, the Applicant’s position was that given any mitigation would be no higher than 4.5m, it would be within the Development Consent Order parameters in the event consent is granted. The applicant also noted that while bunds would be incongruous, they would not give rise to ‘new’ significant effects but may give rise to ‘increased’ significant effects. Breckland is not aware of any evidence that supports this conclusion.
- 3.3 The Council is concerned that this information has emerged at a very late stage in the Examination and remains insufficiently developed to enable a full and informed assessment. Depending upon its final form, the mitigation could give rise to additional or increased effects on landscape character, visual amenity, agricultural land, drainage and ground levels. It is paramount that any such effects are included within the Environmental Assessment and assessed by the Examining Authority prior to determination.
- 3.4 By way of illustration, a 4.5 metre high bund with side slopes of approximately 1:3 would have a substantial footprint of up to 30m and could require significant cut and fill works or imported material. The Norfolk County Council Lead Local Floor Authority Officer also noted that associated changes to drainage would require attenuation features; these could give rise to further adverse landscape and visual effects. The Council is therefore unable to conclude that the mitigation would be acceptable without clearer information on dimensions, alignment,

construction, materials, drainage implications, landscape treatment and removal or reinstatement arrangements.

3.5 The Applicant confirmed that at the end of the project life, any necessary mitigation measures would be removed and the ground reinstated. The Council would like to understand what mechanisms are in place to ensure the land is reinstated at the end of the project life as the potential bunds are not referenced within the submitted outline Decommissioning Strategy (APP/7.10.2 (Revision 2)).

3.6 The Council is not questioning the need to safeguard RAF Marham or suggesting that an acceptable solution is incapable of being developed. Its concern is that the environmental acceptability of an undefined solution should not be assumed solely because its maximum height might fall within a general parameter applying to other elements of the Scheme.

4.0 Need for Sufficiently Prescriptive Controls

4.1 The Council's recent experience of discharging requirements for nationally significant energy infrastructure (Norfolk Vanguard Offshore Wind Farm Order 2022 and the Norfolk Boreas Offshore Wind Farm Order 2021) demonstrates the importance of ensuring that the Development Consent Order, certified documents and design parameters are sufficiently precise and well informed at the consent stage. Certainty at this stage assists the relevant planning authority in determining whether subsequent detailed proposals fall within the assessed envelope and can be confidently and lawfully approved with minimal delay.

4.2 Accordingly, if the precise radar mitigation solution cannot be confirmed during the Examination, the Council considers that the Development Consent Order should establish a clear, sufficiently prescriptive and enforceable approval mechanism. This should secure, as a minimum:

- Consultation with the relevant planning authority, LLFA and the Defence Infrastructure Organisation;
- Defined limits on the location, height, length, footprint and form of physical mitigation;
- Assessment of landscape, visual, drainage, agricultural, ecological and highways implications;
- Details of earthworks and the source, handling and disposal of material;
- Landscape integration, establishment, management and maintenance measures;
- Confirmation that the mitigation remains within the environmental envelope assessed; and

- Removal of the mitigation and satisfactory reinstatement of the land when it is no longer required.

4.3 The Council considers that the mechanism must be as prescriptive as possible and should not leave the scale and environmental acceptability of potentially substantial physical works to be determined only after development consent has been granted.

5.0 Other Landscape and Cumulative Matters

5.1 The Council maintains its previously raised concerns regarding the adequacy of local landscape character analysis, the treatment of openness and panoramic views, and the cumulative and sequential effects of energy infrastructure within Breckland and the wider Norfolk area.

5.2 The Council acknowledges that the Applicant has undertaken a cumulative assessment using its stated methodology. However, methodological compliance does not require the Council to accept the Applicant's conclusions regarding the magnitude or significance of cumulative effects. Those conclusions remain matters of professional and planning judgement for the Examining Authority.

6.0 Closing Statement

6.1 The Council asks the Examining Authority to give careful weight to the adverse change to open views and landscape character experienced from the A1065. It also asks the Examining Authority to ensure that any RAF Marham mitigation is either sufficiently defined and assessed before the close of the Examination or controlled through a clear, prescriptive and enforceable Development Consent Order mechanism.

6.2 Until the height, form, location and extent of the aviation mitigation are confirmed, the Council considers that the full landscape and environmental effects of the Scheme cannot be assessed with sufficient certainty.

6.3 The Council remains committed to ongoing engagement with the Applicant, statutory consultees and other interested parties throughout the remainder of the Examination.