Planning Inspectorate
Arolygiaeth Gynllunio

Hearing Transcript

Project:	EN0110013 - The Droves Solar Farm
Hearing:	Recording of Issue Specific Hearing 2 (ISH2) - Part 2
Date:	08 September 2026

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The video recording published on the Planning Inspectorate project page is the primary record of the hearing.

1
00:00:00,151 --> 00:00:04,590
Thank you. It's 11:50. This hearing has now resumed.

2
00:00:06,090 --> 00:00:08,010
So the next topic is aviation.

3
00:00:09,570 --> 00:00:14,295
Could the applicant provide progress update to include cumulative effects on how it

4
00:00:14,310 --> 00:00:18,991
proposes to avoid interference from the proposed development with the Royal Air

5
00:00:19,081 --> 00:00:24,930
Force Marham's precision approach radar, and whether its proposed approach has been

6
00:00:25,020 --> 00:00:29,850
agreed with the Defense Infrastructure Organization?

7
00:00:29,911 --> 00:00:33,060
Thank you, Sir Alex Tresadern, on behalf of the applicant.

8
00:00:33,240 --> 00:00:39,120
I'm conscious that this has been addressed largely already in

9
00:00:39,151 --> 00:00:45,030
our own pointing out the requirements on the face of the DCO in relation to

10
00:00:45,090 --> 00:00:50,205
these matters. Just to reiterate the productive meeting we had with the MOD on

11
00:00:50,310 --> 00:00:56,235
Friday, and the proposed solution being two requirements on the

12
00:00:56,310 --> 00:01:01,785
face of the DCO, one for mitigation at detailed design stage in respect of the

13
00:01:02,220 --> 00:01:08,055
impact on precision approach radar at RAF Marham, and the other requirement being

14
00:01:08,100 --> 00:01:11,940
in relation to a glint and glare management plan to

15
00:01:13,680 --> 00:01:17,850
address the Ministry of Defense's concerns in relation to glint and glare.

16
00:01:22,410 --> 00:01:27,360
Thank you. Are you able to provide an insight into what that mitigation

17
00:01:28,440 --> 00:01:29,250
might look like?

18
00:01:30,750 --> 00:01:33,450
Thank you, Sir Alex Tresadern on behalf of the applicant.

19
00:01:33,495 --> 00:01:39,405
So the applicant submitted proposals for technical mitigation to the Ministry of

20
00:01:39,420 --> 00:01:44,310
Defense, but those were confirmed to not be feasible by the Ministry of Defense's

21
00:01:44,370 --> 00:01:48,990
representatives and therefore, as was touched on earlier by Mr.

22
00:01:49,200 --> 00:01:53,400
Wilson, the applicant intends to produce at a detailed design stage of the scheme,

23
00:01:53,760 --> 00:01:59,025
a physical mitigation solution which would adequately screen the relevant solar

24
00:01:59,101 --> 00:02:02,280
panels from the precision approach radar.

25
00:02:03,690 --> 00:02:07,590
It's important to note, I think, that the applicant and the Ministry of Defense

26
00:02:07,650 --> 00:02:13,530
have agreed a plan of the precise areas of those solar panels that require

27
00:02:13,590 --> 00:02:16,275
mitigation, and those are the three areas that Mr.

28
00:02:16,546 --> 00:02:21,120
Wilson referenced earlier, because I'm conscious that the Ministry of Defense's

29
00:02:21,510 --> 00:02:25,530
initial representation referenced several fields in their entirety.

30
00:02:25,830 --> 00:02:30,090
So it's worth noting that this has been significantly narrowed down.

31
00:02:30,180 --> 00:02:32,145
And once that plan is

32
00:02:33,421 --> 00:02:37,620
finalized with the Ministry of Defense, and therefore the applicant intends to

33
00:02:37,650 --> 00:02:41,520
submit this plan into the examination shortly.

34
00:02:42,601 --> 00:02:48,585
The mitigation solution will involve non-reflective physical

35
00:02:49,171 --> 00:02:54,840
obstructions of a height no greater than 4.5 meters tall, which is within

36
00:02:54,900 --> 00:03:00,750
the maximum design parameters already committed to by the applicant in the design

37
00:03:00,780 --> 00:03:06,030
principles, parameters, and commitments document, which would be placed throughout

38
00:03:06,060 --> 00:03:11,550
the affected areas in order to obscure the panels behind them, which has been

39
00:03:11,580 --> 00:03:14,910
agreed in principle with the Ministry of Defense.

40
00:03:15,781 --> 00:03:19,785
The other design parameters in relation to this mitigation are in the process of

41
00:03:19,800 --> 00:03:24,960
being agreed with the Ministry of Defense, and the applicant will therefore update

42
00:03:24,990 --> 00:03:29,610
at deadline five, because we just need slightly longer than deadline four next

43
00:03:29,671 --> 00:03:34,650
week. They will update the design principles, parameters, and commitments document

44
00:03:35,070 --> 00:03:40,560
and the assessment of effects in the landscape and visual environmental statement

45
00:03:40,620 --> 00:03:46,590
chapter to take into account the mitigation proposed in relation to interference on

46
00:03:46,710 --> 00:03:52,050
precision approach radar. And as I say, that has been agreed in principle with the

47
00:03:52,110 --> 00:03:52,890
Ministry of Defense.

48
00:03:55,110 --> 00:03:55,860
Okay, thank you.

49
00:03:58,710 --> 00:04:01,921
Mr. Wald or Mr. Wilson, would you like to come in?

50
00:04:07,320 --> 00:04:11,130
Yes. John Wilson for the Defense Infrastructure Organization.

51
00:04:11,400 --> 00:04:15,765
Yes, it is correct, Mr. Chair. The applicant has agreed with the Ministry of

52
00:04:15,765 --> 00:04:21,720
Defense the principle of establishing requirements to address the AR impacts

53
00:04:21,781 --> 00:04:27,734
or precision approach radar impacts, and to provide a glint and glare

54
00:04:27,750 --> 00:04:32,160
management plan to deal with any adverse impacts that may arise.

55
00:04:32,281 --> 00:04:36,660
Just one thing I would like to comment on there that's just been identified.

56
00:04:37,710 --> 00:04:43,515
The requirement that we are finalizing to secure mitigation to address the

57
00:04:43,830 --> 00:04:48,750
possible impacts to the precision approach radar does not specify the dimensions or

58
00:04:48,900 --> 00:04:50,520
the form of the screening structures.

59
00:04:51,540 --> 00:04:55,201
It just identifies that these structures will be necessary to

60
00:04:56,430 --> 00:05:01,966
prevent the precision approach radar being able to have radar line of sight to the

61
00:05:01,980 --> 00:05:03,570
relevant solar arrays.

62
00:05:04,800 --> 00:05:10,740
Whether they would need to be 4.5 meters in height or greater, possibly, to ensure

63
00:05:10,800 --> 00:05:13,890
they adequately screen them, we're not able to verify at this point.

64
00:05:14,970 --> 00:05:20,160
We would need to review the details of any design scheme at the point it is

65
00:05:20,250 --> 00:05:25,216
finalized to confirm that the structures are suitable to ensure that there is no

66
00:05:25,500 --> 00:05:28,216
radar line of sight to those solar installations.

67
00:05:30,540 --> 00:05:30,930
Thank you.

68
00:05:37,020 --> 00:05:42,990
Okay, so just to be clear then, so you're submitting a plan, a mitigation plan,

69
00:05:43,080 --> 00:05:45,330
and that will be for the precision approach radar.

70
00:05:45,781 --> 00:05:51,750
Sorry, so just to clarify, the plan is only to show the three areas that will be

71
00:05:51,810 --> 00:05:55,170
impacted as has been agreed with the Ministry of Defense.

72
00:05:55,230 --> 00:06:00,720
The detail of the plan will come at a detailed design stage, and that would in

73
00:06:00,781 --> 00:06:03,630
accordance with our requirement wording, which I appreciate you haven't yet seen,

74
00:06:03,720 --> 00:06:06,120
as we're finalizing with the Ministry of Defense.

75
00:06:06,180 --> 00:06:10,350
That would need to be submitted to and approved by the local planning authority in

76
00:06:10,440 --> 00:06:15,031
consultation with the Ministry of Defense, as is normal practice for such

77
00:06:15,060 --> 00:06:18,990
requirements. But the plan I'm referring to is just a picture, if you like-

78
00:06:19,140 --> 00:06:20,760
Okay. It's not an actual plan.

79
00:06:20,775 --> 00:06:20,775
Of the mitigation areas.

80
00:06:20,820 --> 00:06:22,230
It's a drawing of-

81
00:06:22,531 --> 00:06:24,061
It's a drawing of where it goes, yeah.

82
00:06:24,180 --> 00:06:24,480
Okay.

83
00:06:31,380 --> 00:06:35,370
Okay, let's move on to glint and glare then.

84

00:06:36,030 --> 00:06:40,710
So could the applicant provide an update to include cumulative effects on how it

85
00:06:40,740 --> 00:06:44,790
proposes to mitigate glint and glare, and whether its proposed approach has been

86
00:06:44,820 --> 00:06:47,760
agreed with the Defense Infrastructure Organization?

87
00:06:48,390 --> 00:06:50,970
Thank you, Sir Alex Tresadern on behalf of the applicant.

88
00:06:51,030 --> 00:06:56,535
So that's the same answer. That will come in a specific requirement which mandates

89
00:06:56,670 --> 00:07:01,860
the production of a glint and glare management plan prior to commencement of the

90
00:07:01,890 --> 00:07:07,425
relevant works, which would need to be submitted to the local planning authority in

91
00:07:07,470 --> 00:07:09,255
consultation with the Ministry of Defense.

92
00:07:09,570 --> 00:07:14,850
And that has been agreed in principle with the Ministry of Defense as well.

93
00:07:15,360 --> 00:07:17,670
Okay, thank you. Any comments, John Wilson?

94
00:07:21,811 --> 00:07:23,460
John Wilson for the Ministry of Defense.

95
00:07:23,640 --> 00:07:28,276
Yes, we confirm that we have instructed on it with the applicant, and we are in the

96
00:07:28,276 --> 00:07:29,940
process of finalizing that requirement.

97
00:07:29,970 --> 00:07:33,210
The principle of having that requirement is agreed between both parties.

98
00:07:34,140 --> 00:07:35,250
Okay, thank you. And-

99
00:07:40,740 --> 00:07:42,091
Hopefully there's no more feedback.

100
00:07:43,620 --> 00:07:46,591
Right. We've got landscape and visual effects tomorrow.

101
00:07:46,831 --> 00:07:52,710
Are you able to indicate what form those mitigations would be in?

102
00:07:52,770 --> 00:07:56,070
Are we talking about fences? Are we talking about bunding?

103
00:07:56,160 --> 00:07:57,600
What would that look like?

104
00:07:58,140 --> 00:08:01,230
Thank you, Sir Alex Tresadern on behalf of the applicant.

105
00:08:02,085 --> 00:08:03,990
That would be a combination of the two.

106
00:08:14,100 --> 00:08:16,651
Okay, thank you. So we'll explore that in more detail

107
00:08:17,910 --> 00:08:18,570
tomorrow.

108
00:08:21,030 --> 00:08:25,230
Could the applicant provide further detail on how it proposes to secure its

109
00:08:25,290 --> 00:08:30,720
commitment to consult with the Ministry of Defense in relation to aerodrome height

110
00:08:30,811 --> 00:08:34,561
safeguarding once the transmission line details are available?

111
00:08:36,841 --> 00:08:39,780
Thank you, Sir Alex Tresadern on behalf of the applicant.

112
00:08:39,841 --> 00:08:45,330
We propose to secure that commitment through the outline construction environmental

113
00:08:45,390 --> 00:08:50,070
management plan, which of course would then become the detailed CEMP at the

114
00:08:50,100 --> 00:08:52,410
appropriate stage of detailed design.

115
00:08:52,500 --> 00:08:56,686
As we touched on earlier, the applicant is currently discussing with the Ministry

116
00:08:56,700 --> 00:09:01,890
of Defense some updates to the wording in the appropriate management plans as

117
00:09:02,040 --> 00:09:06,825
necessary to ensure the Ministry of Defense is satisfied that the consultation and

118
00:09:06,870 --> 00:09:11,880
approval mechanisms for them in relation to this matter, bird strike safeguarding

119
00:09:11,940 --> 00:09:16,140
and the management of construction equipment are all appropriately secured.

120
00:09:17,238 --> 00:09:22,038

Okay, thank you. Because I couldn't find this particular commitment in the current

121
00:09:22,308 --> 00:09:25,278
version of the outline construction environment.

122
00:09:25,398 --> 00:09:28,608
Thank you, sir. We'll be updating it at that effect once agreed with the MOD.

123
00:09:28,878 --> 00:09:29,267
Okay.

124
00:09:31,878 --> 00:09:35,719
And I was suggesting that this covers the next question as well, which is

125
00:09:35,988 --> 00:09:40,338
methodology for possible use of cranes, high-reaching plant equipment, temporal

126
00:09:40,428 --> 00:09:42,798
structure during the construction.

127
00:09:42,888 --> 00:09:47,313
Exactly, sir. Alex Treseden for the applicant. I don't want to put words in Mr.

128
00:09:47,538 --> 00:09:52,908
Wilson's mouth, but we had a discussion on Friday whereby the Ministry of Defence

129
00:09:52,969 --> 00:09:57,888
raised some concerns about the method of this consultation

130
00:09:57,918 --> 00:10:01,128
approval being in a management plan.

131
00:10:01,188 --> 00:10:05,327
But we believe that that is the appropriate place for it, and we explained that to

132

00:10:05,358 --> 00:10:09,033
the Ministry of Defence, and they've asked us to update the wording of those

133
00:10:09,108 --> 00:10:13,203
management plans for their consideration as to whether that would satisfy what

134
00:10:13,219 --> 00:10:16,788
they're looking for in relation to the consultation approval process.

135
00:10:16,862 --> 00:10:20,853
So given that that meeting only took place on Friday, we're in the process of doing

136
00:10:20,928 --> 00:10:24,558
that, and then we'll send that directly to the Ministry of Defence for their

137
00:10:24,588 --> 00:10:25,219
consideration.

138
00:10:26,418 --> 00:10:29,719
Okay, thank you. Any comments? John Wilson.

139
00:10:32,808 --> 00:10:34,698
John Wilson for the Ministry of Defence.

140
00:10:35,478 --> 00:10:40,818
Yes, in relation to overhead lines, the main concern the Ministry of Defence has is

141
00:10:40,878 --> 00:10:46,099
to ensure it receives adequate information about any new island structures that are

142
00:10:46,698 --> 00:10:52,368
constructed or any existing islands that are removed so that aviation

143
00:10:52,458 --> 00:10:58,248
chart information can be updated on a timely basis to maintain

aviation safety.

144
00:10:58,728 --> 00:11:03,844
We have put forward a requirement that has already been used in other nationally

145
00:11:03,858 --> 00:11:09,768
significant infrastructure project schemes for the applicant to consider, which

146
00:11:09,828 --> 00:11:14,778
would secure the submission of this sort of information so that this can be done.

147
00:11:15,183 --> 00:11:20,508
And we expect this is something that we will discuss further with the applicant in

148
00:11:20,523 --> 00:11:25,849
due course. In relation to the proposed use of construction environments management

149
00:11:25,878 --> 00:11:30,827
plan to make provision for the Ministry of Defence to be consulted about the

150
00:11:30,888 --> 00:11:36,213
deployment of craneage or construction equipment. As Mr.

151
00:11:36,288 --> 00:11:40,863
Treseden has explained, the MOD still has concerns about that.

152
00:11:40,969 --> 00:11:46,953
We have proposed a requirement to secure this provision in our initial statutory

153
00:11:46,998 --> 00:11:51,168
response on this application, and we have had constructive dialogue with the

154
00:11:51,228 --> 00:11:55,758
applicant about this. We remain concerned about the

155
00:11:56,838 --> 00:12:02,658
appropriate use of this management plan for this to ensure that the MOD can be

156
00:12:02,688 --> 00:12:07,608
consulted and that any concerns or requirements the MOD might then make

157
00:12:08,448 --> 00:12:13,278
that are necessary to maintain aviation safety, whether they would be a requirement

158
00:12:13,368 --> 00:12:15,738
to for those to be taken into account.

159
00:12:16,158 --> 00:12:21,288
For example, if the MOD proposed going was to tour or would have an adverse impact

160
00:12:21,408 --> 00:12:25,833
on the operation of radars or other navigation equipment in that area of the

161
00:12:25,878 --> 00:12:30,948
market. So we are concerned about that, and we are concerned that there's not

162
00:12:30,978 --> 00:12:36,573
necessarily an appropriate mechanism to ensure any such arrangements are

163
00:12:37,278 --> 00:12:41,133
enforceable or would involve planning authority to oversee this.

164
00:12:41,538 --> 00:12:43,474
But that is something that the applicant is aware of.

165
00:12:43,788 --> 00:12:45,198
We've asked for further information

166
00:12:46,608 --> 00:12:51,229
to explain to us how that would work, and we'll look into that

further with the

167
00:12:51,258 --> 00:12:56,373
applicant in due course. On the issue about bird strike hazard concerns, the

168
00:12:56,418 --> 00:13:02,388
specific issue there is the MOD needs to review the design of water

169
00:13:02,568 --> 00:13:08,058
bodies that are identified in the scheme that's been outlined to ensure that they

170
00:13:08,418 --> 00:13:10,488
won't introduce a bird strike hazard.

171
00:13:10,969 --> 00:13:16,352
So this is really a matter of the MOD being consulted on plans or submission of

172
00:13:16,428 --> 00:13:21,303
detailed plans and when they were placed as appropriate in the construction

173
00:13:21,348 --> 00:13:27,003
environment management plan. And again, it's a matter of how any such

174
00:13:27,108 --> 00:13:33,078
review process would be secured and enforced in relation to any response the MOD

175
00:13:33,138 --> 00:13:37,219
may make on those aspects in due course.

176
00:13:37,308 --> 00:13:40,203
So that's something else we're going to follow up with the applicant, and we will

177
00:13:40,278 --> 00:13:42,288
update our position accordingly.

178

00:13:44,058 --> 00:13:44,448
Thank you.

179
00:13:45,828 --> 00:13:49,053
Thank you, sir. Alex Treseden on behalf of the applicant.

180
00:13:49,339 --> 00:13:53,628
I think the key takeaway is that we're discussing the matters, and we'll reach an

181
00:13:53,689 --> 00:13:57,798
agreed position. I would just note that on the difference between a requirement and

182
00:13:58,189 --> 00:14:01,368
having a measure secured in the management plan, securing a measure in the

183
00:14:01,428 --> 00:14:06,498
management plan doesn't make it any less binding on the applicant because whatever

184
00:14:06,528 --> 00:14:10,878
management plan that would relate to, let's take the construction environmental

185
00:14:10,909 --> 00:14:16,848
management plan as an example, that is secured via a requirement

186
00:14:16,939 --> 00:14:21,738
already on the face of the DCO, and therefore it's looking to avoid repetition

187
00:14:21,768 --> 00:14:26,118
whereby you list out plenty of mitigation measures as separate requirements in the

188
00:14:26,178 --> 00:14:31,068
DCO that are already included in that management plan which is already secured via

189
00:14:31,128 --> 00:14:35,448
a requirement. So that's our point on that matter, and we're looking

to update the

190
00:14:35,508 --> 00:14:41,358
text in that management plan so that it satisfies the Ministry of Defence in

191
00:14:41,418 --> 00:14:46,038
relation to the consultation and indeed approval processes that they're looking

192
00:14:46,098 --> 00:14:50,568
for. But I just want to clarify that including the measures in a management plan

193
00:14:50,719 --> 00:14:54,198
doesn't make it any less binding on the applicant.

194
00:14:56,148 --> 00:14:56,808
Okay, thank you.

195
00:15:00,858 --> 00:15:03,888
So we've covered the construction environments management plans.

196
00:15:04,638 --> 00:15:07,219
The operational environment management plan,

197
00:15:09,828 --> 00:15:14,808
has the Defense Infrastructure Organization agreed

198
00:15:14,868 --> 00:15:20,178
wording on that environmental management plan regarding the need to

199
00:15:20,253 --> 00:15:24,528
consult the MOD for bird strike hazard?

200
00:15:26,719 --> 00:15:28,098
So there are two separate plans, weren't there?

201
00:15:28,159 --> 00:15:31,653
The construction environment management plan and the operational one.

202
00:15:34,848 --> 00:15:36,168
Wilson for the Ministry of Defence.

203
00:15:36,409 --> 00:15:40,189
No, the MOD hasn't agreed the wording for these provisions.

204
00:15:40,308 --> 00:15:44,238
We've identified our concerns, and the inquiry, as we still have about that.

205
00:15:44,778 --> 00:15:49,638
At the moment, the position of the MOD is it defers back to the requirements it

206
00:15:49,967 --> 00:15:54,229
identified in its initial statutory response as being the appropriate way to

207
00:15:54,288 --> 00:15:58,427
address the concerns that the MOD's identified.

208
00:15:59,778 --> 00:16:03,348
So if I might just respond to that, please, Alex Treseden on behalf of the

209
00:16:03,378 --> 00:16:07,518
applicant. I think it's fair to say that the discussions in relation to the

210
00:16:07,548 --> 00:16:10,878
construction environmental management plan will incorporate discussions about the

211
00:16:10,909 --> 00:16:14,073
wording of the operational environmental management plan, and the applicant is

212
00:16:14,118 --> 00:16:19,098
proposing to include wording in relation to that as a belts and braces approach to

213
00:16:19,608 --> 00:16:24,333

satisfy the Ministry of Defence in relation to not increasing the risk of impact of

214
00:16:24,348 --> 00:16:26,568
bird strike during the operational phase.

215
00:16:27,979 --> 00:16:30,948
Okay, thank you for clarifying. Any final word,

216
00:16:32,628 --> 00:16:34,308
Mr. John Wilson?

217
00:16:38,479 --> 00:16:40,098
John Wilson for the Ministry of Defence.

218
00:16:40,488 --> 00:16:45,048
In relation to the operational management plan, one of the comments we've shared

219
00:16:45,078 --> 00:16:49,323
with the applicant is we're a little perplexed as to why there would need to be

220
00:16:49,339 --> 00:16:53,928
provision for bird management or reference to bird management matters in that

221
00:16:54,318 --> 00:16:59,748
because the whole purpose of ensuring the design of the water bodies or other

222
00:17:00,138 --> 00:17:04,548
associated habitat features relating to equipment that might be built in the scheme

223
00:17:04,998 --> 00:17:08,149
is designed appropriately to prevent any such hazard.

224
00:17:08,928 --> 00:17:13,969
If any water feature or habitat that the MOD

225
00:17:13,998 --> 00:17:19,518

identifies that could introduce a bird hazard were to be included in the scheme,

226
00:17:19,698 --> 00:17:24,229
the MOD would be identifying a requirement for a specific bird hazard management

227
00:17:24,288 --> 00:17:28,668
plan, which is a separate entity entirely.

228
00:17:29,118 --> 00:17:34,578
As such, the MOD at the moment is taking the view that the features that are

229
00:17:34,788 --> 00:17:39,078
identified shouldn't necessarily need this, and it should all be addressed in the

230
00:17:39,138 --> 00:17:43,923
design of it, and as such, it probably would not be necessary for such provisions

231
00:17:43,968 --> 00:17:48,468
to go in an operational plan and it would not be relevant.

232
00:17:48,589 --> 00:17:51,228
Sir, Alex Treseden on behalf of the applicant, please.

233
00:17:51,528 --> 00:17:57,168
I think those are all fair points. We included the wording in the

234
00:17:57,228 --> 00:18:02,103
operational environmental management plan as a belts and braces approach, as I've

235
00:18:02,118 --> 00:18:07,353
said, and really that is an extra commitment that the applicant is undertaking.

236
00:18:07,968 --> 00:18:10,774
I agree it may not be necessary, but it's an extra commitment for the Ministry of

237
00:18:10,788 --> 00:18:14,118
Defence's benefit. So if the Ministry of Defence would like us to take that

238
00:18:14,149 --> 00:18:17,927
commitment out of the management plan, we're obviously happy to do so.

239
00:18:20,868 --> 00:18:21,409
John Wilson

240
00:18:26,988 --> 00:18:28,518
John Wilson, Ministry of Defence.

241
00:18:28,758 --> 00:18:33,409
The only concern we have in that respect is that the inclusion of that sort of

242
00:18:33,438 --> 00:18:38,358
wording or apparent need for it would infer that the applicant is perhaps

243
00:18:38,388 --> 00:18:44,343
anticipating that the habitat they're just upgrading might introduce a hazard,

244
00:18:44,808 --> 00:18:49,848
and that as such, it might be appropriate that they are allowed to create such

245
00:18:50,238 --> 00:18:53,418
hazard, whereas the MOD takes the view it should be designed so that they cannot

246
00:18:54,018 --> 00:18:58,818
create any such hazard. So it's a matter of ensuring we've got appropriate

247
00:18:58,878 --> 00:19:03,784
mechanisms for the MOD to review the details of the design then produced and

248

00:19:03,828 --> 00:19:08,538
respond to the relevant planning authority to identify what measures may be

249
00:19:08,568 --> 00:19:12,468
necessary to ensure that they cannot create a hazard, rather than making provisions

250
00:19:12,498 --> 00:19:18,378
to have ongoing management of a hazard in such proximity to a

251
00:19:18,468 --> 00:19:20,899
key operation air base such as RAF Marham.

252
00:19:22,188 --> 00:19:24,048
And so Alex Tressiden on behalf of the applicant.

253
00:19:24,318 --> 00:19:27,498
That is exactly how we intend to design the scheme.

254
00:19:27,888 --> 00:19:33,708
But the applicant can't predict how the landscape and anything else might change

255
00:19:34,008 --> 00:19:36,288
when operation of the scheme is underway.

256
00:19:36,318 --> 00:19:40,128
And therefore, that's the belts and braces approach that we're referring to by

257
00:19:40,159 --> 00:19:45,288
including this wording. Rather than any desire or expectation or anything that it

258
00:19:45,318 --> 00:19:49,399
would be necessary, it's that comfort and belts and braces approach that was the

259
00:19:49,428 --> 00:19:53,928
reason for including that wording in the operational environmental management plan.

260
00:19:53,988 --> 00:19:58,339
But as I say, if the Ministry of Defence would prefer that that commitment was

261
00:19:58,368 --> 00:20:00,168
removed, we'd be happy to do so.

262
00:20:03,647 --> 00:20:04,518
John Wilson.

263
00:20:10,788 --> 00:20:12,258
John Wilson for the Ministry of Defence.

264
00:20:12,409 --> 00:20:16,518
At this stage, we don't perceive it's necessary to remove it, but we would like to

265
00:20:16,578 --> 00:20:22,353
clarify how the consultation arrangement of the design aspects will be secured and

266
00:20:22,399 --> 00:20:25,757
implemented. That is what the MOD considers to be key to this.

267
00:20:26,238 --> 00:20:30,738
And the MOD remains of the view that having that and ensuring that works

268
00:20:30,768 --> 00:20:34,548
effectively should ensure that there is no need for any separate provision

269
00:20:34,578 --> 00:20:39,138
thereafter. However, if there is going to be a need for ongoing management, the MOD

270
00:20:39,528 --> 00:20:43,638
remains of the view that separate provision should be provided, and that wouldn't

271
00:20:43,668 --> 00:20:48,573
necessarily output just have the provisions that are currently

outlined in the

272
00:20:48,589 --> 00:20:50,748
operational management plan to account for that.

273
00:20:51,258 --> 00:20:55,593
As it stands at the moment, other than having a commitment itself in the MOD, the

274
00:20:55,608 --> 00:21:00,078
provisions in the operational management plan don't actually set out a defined

275
00:21:00,409 --> 00:21:04,368
requirement or a framework of what the piece of third management plan would need to

276
00:21:04,488 --> 00:21:10,083
be. However, I think what the MOD and the applicant agree on is not expecting that

277
00:21:10,083 --> 00:21:15,589
these provisions will be needed. So hopefully that should all be done correctly.

278
00:21:15,858 --> 00:21:20,418
But really, that's the key design approval stage that's got to be

279
00:21:20,448 --> 00:21:21,903
developed.

280
00:21:22,068 --> 00:21:24,678
So Alex Tressiden on behalf of the applicant. That's absolutely right.

281
00:21:24,708 --> 00:21:28,428
And I think, again, the key point to take away is that the applicant and the MOD

282
00:21:28,488 --> 00:21:33,828
are discussing the wording in the outline construction environmental management

283
00:21:33,918 --> 00:21:38,868
plan that refers to consultation and indeed approval by the MOD of the matters

284
00:21:38,928 --> 00:21:43,518
being discussed, and therefore once that is agreed, I agree that the operational

285
00:21:43,548 --> 00:21:46,668
provisions will fall away. But that's the key bit of discussion that we'll be

286
00:21:46,998 --> 00:21:50,118
progressing, and we'll reach agreement on before the end of the examination.

287
00:21:50,508 --> 00:21:51,228
Okay. Thank you.

288
00:21:52,878 --> 00:21:58,428
John Wilson, are there any other concerns that we haven't discussed?

289
00:22:02,028 --> 00:22:03,558
John Wilson for the Ministry of Defence.

290
00:22:03,858 --> 00:22:08,298
No, I don't think there's anything else that hasn't been covered at this stage.

291
00:22:08,628 --> 00:22:12,888
We don't have any further issues we wish to raise at the moment.

292
00:22:13,668 --> 00:22:18,618
Okay. Thank you. I think what would help me is to have a latest up-to-date

293
00:22:18,828 --> 00:22:22,758
statement of common ground between yourselves.

294
00:22:23,718 --> 00:22:28,188
I'm not sure if there... Has there been one? Was the one updated by one?

295
00:22:29,808 --> 00:22:31,668
Alex Tressiden on behalf of the applicant.

296
00:22:31,938 --> 00:22:33,768
I believe indeed there was-

297
00:22:33,828 --> 00:22:34,488
Think there, yeah

298
00:22:34,668 --> 00:22:37,339
... just quickly. Yes, there was ref 1-89.

299
00:22:37,428 --> 00:22:39,498
But yes, we'd be happy to submit an updated version.

300
00:22:39,738 --> 00:22:41,598
Okay. Thank you.

301
00:22:42,198 --> 00:22:45,528
Can I make a comment? Mark Holmes, local resident.

302
00:22:45,828 --> 00:22:49,998
Is it possible to clarify here today the disagreement on the height of these bunds

303
00:22:50,058 --> 00:22:53,688
or fences? The applicant said 4.5 meters.

304
00:22:55,038 --> 00:23:00,288
John Wilson said greater than 4.5 meters, so we're talking at least 15 foot.

305
00:23:00,409 --> 00:23:04,038
I don't know how high we're getting, but these are pretty high features.

306
00:23:04,518 --> 00:23:08,448
It'd be nice to have more information on that today, if possible, please.

307

00:23:08,508 --> 00:23:09,318
Alex Tressiden.

308
00:23:12,708 --> 00:23:14,538
Thank you, sir. Alex Tressiden on behalf of the applicant.

309
00:23:14,598 --> 00:23:19,098
I'm going to initially pass over to James Palmer, my colleague on my right, for a

310
00:23:19,128 --> 00:23:23,793
response on this. But I will also note that this is likely to be discussed at

311
00:23:23,808 --> 00:23:28,698
greater length in tomorrow's hearing, where we will have our landscape expert with

312
00:23:28,788 --> 00:23:29,868
us at the same time.

313
00:23:33,558 --> 00:23:35,659
Thank you. James Palmer on behalf of the applicant.

314
00:23:37,008 --> 00:23:37,428
I think

315
00:23:38,778 --> 00:23:42,784
the important thing to note is that what has been agreed between the applicant and

316
00:23:42,798 --> 00:23:47,478
the Ministry of Defence is the areas which require mitigation, not the specific

317
00:23:47,508 --> 00:23:51,138
mechanism by which that mitigation would be implemented.

318
00:23:51,228 --> 00:23:56,433
There is an agreement that will have to be in the form of physical screening, but

319

00:23:56,478 --> 00:24:02,118
we have not as yet provided any plan for what that screening would look like, and

320
00:24:02,149 --> 00:24:04,008
that will come at the detailed design stage.

321
00:24:04,909 --> 00:24:05,718
The applicant

322
00:24:07,278 --> 00:24:11,492
is committing to the maximum height of 4.5 meters

323
00:24:12,948 --> 00:24:15,258
for the screening. That

324
00:24:17,538 --> 00:24:21,138
ensures it sits within the maximum design parameters that have been committed to

325
00:24:21,168 --> 00:24:22,308
within the works areas.

326
00:24:23,659 --> 00:24:29,628
And the result of that is that what we might be looking at is

327
00:24:29,643 --> 00:24:35,524
not just one screening along the boundary, but potentially looking at layers

328
00:24:35,628 --> 00:24:41,178
of that. I won't go into much detail at this stage because that should be left to

329
00:24:41,208 --> 00:24:45,649
the detailed plan, but I think that might be where the discrepancy is coming.

330
00:24:45,858 --> 00:24:49,818
If we were to put something on the boundary to screen the entire site, that would

331

00:24:49,848 --> 00:24:53,418
likely have to be more than 4.5 meters, but that's not the intention of the

332
00:24:53,448 --> 00:24:53,897
applicant.

333
00:24:56,268 --> 00:25:00,348
Thank you. And any indication at this stage, we've talked about the drawing, but is

334
00:25:00,378 --> 00:25:04,399
there any indication of the extent of this area that would be affected?

335
00:25:06,858 --> 00:25:08,298
Alex Tressiden on behalf of the applicant.

336
00:25:08,358 --> 00:25:11,268
Do you mean in terms of acreage or hectares, sir?

337
00:25:11,928 --> 00:25:15,452
Well, there were a number of fields affected before.

338
00:25:15,858 --> 00:25:18,513
What is the change in that position then?

339
00:25:19,968 --> 00:25:25,293
They're significantly smaller than the entirety of the fields that were referred to

340
00:25:25,339 --> 00:25:27,438
in the Ministry of Defence's relevant representation.

341
00:25:27,468 --> 00:25:32,178
But as I say, we'd be happy to submit that plan into the examination so it can be

342
00:25:32,688 --> 00:25:35,208
shown. We just need to just finalize the presentation of that.

343
00:25:35,388 --> 00:25:38,508

Okay. Will that be ready for deadline four?

344
00:25:47,928 --> 00:25:49,202
Alex Tressiden on behalf of the applicant.

345
00:25:49,279 --> 00:25:52,758
Yes, we can do that, provided the Ministry of Defence are happy for us to submit

346
00:25:53,839 --> 00:25:55,548
what they've provided into the examination.

347
00:25:55,608 --> 00:25:58,788
We would just put the applicant's referencing on the front, et cetera.

348
00:25:58,818 --> 00:26:00,078
But the plan is agreed.

349
00:26:01,339 --> 00:26:05,568
Thank you. Any comments? John Wilson.

350
00:26:08,268 --> 00:26:09,828
John Wilson, Ministry of Defence.

351
00:26:10,339 --> 00:26:13,218
The comments we made originally about the heights were just to highlight that

352
00:26:13,878 --> 00:26:19,308
obviously the detail of the screening hasn't been considered yet.

353
00:26:19,399 --> 00:26:23,688
And I thought it was appropriate to highlight that depending on how it's installed,

354
00:26:23,988 --> 00:26:28,428
it might necessarily need to be taller than 4.5 meters.

355
00:26:29,448 --> 00:26:34,264
With respect to the comments that have just been made, yes, if the screening is

356
00:26:34,279 --> 00:26:34,968
going to be put in

357
00:26:36,978 --> 00:26:42,243
front of each row of the arrays, then it's possible it could be considerably lower

358
00:26:42,318 --> 00:26:44,478
than might otherwise be expected.

359
00:26:44,538 --> 00:26:50,103
However, it really depends how far in front of each solar array or

360
00:26:50,178 --> 00:26:53,178
installation it's based as to what height it needs to be.

361
00:26:53,298 --> 00:26:58,863
So I would remain of the view that we ought to be cautious about stating at this

362
00:26:58,938 --> 00:27:01,743
stage that they would definitely no higher than 4.5 meters.

363
00:27:02,118 --> 00:27:06,738
We'll just have to review the design further support provided by the applicant of

364
00:27:06,753 --> 00:27:11,538
that occupied, and we would want to ensure that the screening is effective and

365
00:27:12,348 --> 00:27:16,083
completely prevent any radar line of sight from the position of radar onto the

366
00:27:16,218 --> 00:27:16,578
arrays.

367
00:27:19,428 --> 00:27:22,639
I don't think at this stage we can go into any further detail on that.

368
00:27:22,728 --> 00:27:25,908
As to the matter of sharing the plan, yes, Ministry of Defence is quite content

369
00:27:25,938 --> 00:27:30,048
that the plan that we have produced and shared with the applicant can be submitted

370
00:27:30,063 --> 00:27:30,828
to examination

371
00:27:32,899 --> 00:27:33,589
Okay, thank you.

372
00:27:35,928 --> 00:27:39,889
So in terms of the height and how that would be secured,

373
00:27:40,518 --> 00:27:46,383
are you proposing any updates to the design principles, parameters, and commitments

374
00:27:46,758 --> 00:27:47,178
document?

375
00:27:48,498 --> 00:27:51,169
Thank you, sir. Alex here on behalf of the applicant. Yes, exactly.

376
00:27:51,214 --> 00:27:54,978
Those are the updates to that document that I'm referring to at deadline five.

377
00:28:22,938 --> 00:28:26,478
Okay. Are there any other comments in the room?

378
00:28:26,508 --> 00:28:31,518
I'll start up nearest me. Julie Barrow.

379
00:28:31,578 --> 00:28:33,618
Julie Barrow, Borough Council, Kings Lynn and West Norfolk.

380

00:28:34,068 --> 00:28:37,878
Just want to note everything that's been said by the applicant today, we do welcome

381
00:28:37,968 --> 00:28:42,198
that. And as everybody's mentioned, it will come up again tomorrow, I think, in

382
00:28:42,228 --> 00:28:45,227
landscaping visuals, so we do welcome further discussion on that.

383
00:28:45,529 --> 00:28:50,553
Looking for a level of comfort that any screening that may be proposed has been

384
00:28:50,598 --> 00:28:55,279
assessed within the environmental impact assessment, it can be addressed through

385
00:28:55,339 --> 00:29:00,589
detailed design. Although our FM is obviously with Kings Lynn and West Norfolk,

386
00:29:01,399 --> 00:29:04,848
there could also be knock-on effects in the Norfolk area to any additional

387
00:29:04,878 --> 00:29:08,839
screening. So we probably won't get the answers tomorrow. I appreciate that.

388
00:29:08,928 --> 00:29:12,378
So yeah, we'd welcome submission of further clarification at deadline five.

389
00:29:12,798 --> 00:29:15,919
Thank you.

390
00:29:18,828 --> 00:29:20,268
Andrew Czerekowski.

391
00:29:20,868 --> 00:29:23,419
Yeah. Thanks. Andrew Czerekowski for Norfolk County Council.

392
00:29:23,508 --> 00:29:27,408
I'd just reiterate what Julie Barrow just said.

393
00:29:27,828 --> 00:29:31,803
I think clearly there's a concern here that there's an issue, and I don't mean to

394
00:29:32,448 --> 00:29:36,889
divert into a discussion we'll have tomorrow about what the potential mitigation

395
00:29:36,948 --> 00:29:40,578
here might comprise for the precision radar, and in particular the extent and the

396
00:29:40,608 --> 00:29:43,878
height of it, because clearly the mitigation itself will then have a further

397
00:29:43,908 --> 00:29:46,758
environmental impact that needs to be taken into account in the environmental

398
00:29:46,848 --> 00:29:51,828
statement. So I say, I don't want to distract into a discussion which is probably

399
00:29:51,858 --> 00:29:53,839
more appropriate in tomorrow's session.

400
00:29:54,198 --> 00:29:58,788
But I think that there's obviously an issue there that's fairly fundamental that we

401
00:29:58,848 --> 00:30:02,508
do need to talk about tomorrow in more detail just to understand how this process

402
00:30:02,538 --> 00:30:06,258
is going to work, because clearly the can/can't be kicked down the road in terms of

403
00:30:06,288 --> 00:30:10,068
the detailed design if that then itself has an impact on the environmental impact

404
00:30:10,158 --> 00:30:10,639
assessment.

405
00:30:14,658 --> 00:30:16,248
Any other comments in the room?

406
00:30:18,288 --> 00:30:22,908
Not seeing any further hands up. Any comments online?

407
00:30:28,698 --> 00:30:34,578
Nope. Okay. So I'll just summarize the actions then on aviation before we

408
00:30:34,639 --> 00:30:40,578
move on to biodiversity. So we're expecting the drawing to be

409
00:30:40,669 --> 00:30:41,163
submitted,

410
00:30:43,518 --> 00:30:46,998
agreed deadline forward made for the precision approach radar.

411
00:30:49,038 --> 00:30:53,688
Wording to be agreed for the outline construction environmental management plan and

412
00:30:53,764 --> 00:30:59,598
the outline operational environmental management

413
00:30:59,658 --> 00:31:01,279
plan with the DIO.

414
00:31:03,348 --> 00:31:05,448
And have we got a deadline in mind for that?

415
00:31:06,738 --> 00:31:08,058
Alex here on behalf of the applicant.

416
00:31:08,149 --> 00:31:12,889
I think it would be helpful if that could be before the end of the examination,

417
00:31:13,008 --> 00:31:17,508
i.e., to enable the Ministry of Defence to withdraw their objection in time for

418
00:31:17,568 --> 00:31:19,818
that, because there is some further discussion needed.

419
00:31:20,779 --> 00:31:26,089
Okay. Just going to come back to John Wilson then on trying to agree a deadline for

420
00:31:26,238 --> 00:31:27,649
those to be agreed.

421
00:31:30,169 --> 00:31:31,578
John Wilson, Ministry of Defence.

422
00:31:31,848 --> 00:31:34,488
We're in agreement with the deadline that's just been suggested.

423
00:31:34,518 --> 00:31:38,524
And that gives sufficient time to review this thoroughly with the applicant

424
00:31:39,768 --> 00:31:43,113
and hope we come to a constructive agreement about how to progress that.

425
00:31:44,029 --> 00:31:46,458
Yeah. So you're suggesting before closing the examination.

426
00:31:46,998 --> 00:31:50,538
Is there any opportunity to improve on that?

427
00:31:50,868 --> 00:31:52,667
Thank you, sir. Alex here on behalf of the applicant.

428
00:31:52,774 --> 00:31:56,538
I think that's what I would be looking to commit to.

429
00:31:56,628 --> 00:31:59,298
Having said that, I would note that the

430
00:32:00,498 --> 00:32:04,608
dialogue with the Ministry of Defence has been extremely proactive, and we're

431
00:32:04,639 --> 00:32:10,128
grateful for their speedy responses on emails and arranging calls that we've done.

432
00:32:10,218 --> 00:32:13,818
So I see no reason why that wouldn't be achievable, and therefore, I hope that

433
00:32:13,848 --> 00:32:17,658
would provide sufficient comfort, i.e., if we get to the position at the end of the

434
00:32:17,718 --> 00:32:21,919
six months, in a couple of months' time, that the MOD's objection is able to be

435
00:32:21,948 --> 00:32:25,218
withdrawn because that wording is agreed before the end of the examination.

436
00:32:25,608 --> 00:32:27,018
I would hope that would be acceptable.

437
00:32:30,589 --> 00:32:32,598
Okay. Any final comments, John Wilson?

438
00:32:35,058 --> 00:32:40,833
John Wilson, Ministry of Defence. No, we have no further comments. Thank you.

439
00:32:40,878 --> 00:32:46,264
Okay. And of course, the statement of common ground needs to be

regularly updated,

440
00:32:46,428 --> 00:32:50,808
so it'd be good to see an update to that as well.

441
00:32:51,139 --> 00:32:55,774
And also, we talked about an update to the design principles, parameters, and

442
00:32:55,878 --> 00:33:00,378
commitments document at deadline five. Yeah.

443
00:33:00,468 --> 00:33:02,268
Okay, thank you.

444
00:33:04,788 --> 00:33:10,248
So we'll now move on to biodiversity, which is the third issue

445
00:33:12,558 --> 00:33:16,639
in the main issues. So first question then, for

446
00:33:16,728 --> 00:33:22,248
biodiversity net gain, could the applicant provide progress update on working

447
00:33:22,339 --> 00:33:26,658
towards an agreed position with the Borough Council of Kings Lynn and West Norfolk

448
00:33:26,688 --> 00:33:29,238
and the Breckland District Council?

449
00:33:35,358 --> 00:33:38,779
Dr Colin Lee, Aspect Ecology, on behalf of the applicant.

450
00:33:39,438 --> 00:33:43,593
Sir, I believe we have agreement in the statement of common ground with both of

451
00:33:43,639 --> 00:33:49,279
those councils that the BNG assessment is acceptable.

452
00:33:50,868 --> 00:33:51,318
Welcome

453
00:33:52,608 --> 00:33:54,708
any comments otherwise from the councils.

454
00:33:57,348 --> 00:34:00,288
Okay. Julie Barrow, would you like to comment?

455
00:34:01,788 --> 00:34:03,858
Julie Barrow, Borough Council of Kings Lynn and West Norfolk.

456
00:34:04,399 --> 00:34:08,449
I've had confirmation from one of the ecologists that she has reviewed the latest

457
00:34:08,899 --> 00:34:12,529
BNG metric. I think we've just got one technical query that we're going to come

458
00:34:12,558 --> 00:34:16,053
back to you on. And I do believe an updated version was actually provided to us at

459
00:34:16,069 --> 00:34:20,029
the end of last week, so we haven't had a chance to look at that yet.

460
00:34:20,089 --> 00:34:22,908
But generally, we are in agreement, subject to a couple of minor points.

461
00:34:23,118 --> 00:34:24,843
Okay, thank you. Simon Wood.

462
00:34:26,628 --> 00:34:31,008
Simon Wood, Breckland Council. I'll hand over to Michael Doyle, our colleague

463
00:34:31,069 --> 00:34:32,613
online, if that's okay, sir.

464
00:34:33,708 --> 00:34:36,529
Thank you.

465
00:34:36,828 --> 00:34:38,839
Michael Doyle on behalf of Breckland Council.

466
00:34:39,828 --> 00:34:42,408
Yes, the council welcome the submission of an updated metric.

467
00:34:42,858 --> 00:34:46,669
However, this was only received yesterday, so the council hasn't had the

468
00:34:46,699 --> 00:34:50,613
opportunity to obtain detailed ecological verification of the inputs and

469
00:34:50,658 --> 00:34:55,233
assumptions and is therefore not presently able to confirm technical agreement with

470
00:34:55,308 --> 00:35:00,348
the metric. Just in general, if the level of BNG is to be relied upon as a

471
00:35:00,408 --> 00:35:04,728
significant benefit in the planning balance, then the council considers that some

472
00:35:04,818 --> 00:35:07,308
certainty on the level to be secured is necessary.

473
00:35:09,378 --> 00:35:14,598
Okay, thank you. Any indication, Michael Doyle, when you'd be able to provide a

474
00:35:14,628 --> 00:35:15,168
response?

475
00:35:19,578 --> 00:35:23,733
Hopefully not too long. We'll get a response from the ecological consultant and

476
00:35:23,748 --> 00:35:25,308
provide a response in writing.

477
00:35:26,928 --> 00:35:28,458
Sir, Alex here on behalf of the applicant.

478
00:35:28,518 --> 00:35:33,588
I think given that deadline four is only next Wednesday, it might be that we target

479
00:35:33,888 --> 00:35:36,318
deadline five for an agreement on BNG matters.

480
00:35:36,348 --> 00:35:38,074
I think that would probably be reasonable.

481
00:35:39,978 --> 00:35:43,368
Okay. Any comments, Michael or Julie

482
00:35:44,598 --> 00:35:44,928
Barrow?

483
00:35:45,348 --> 00:35:46,038
Julie Barrow.

484
00:35:46,083 --> 00:35:48,483
Agree with that. Sorry, go ahead, Julie.

485
00:35:48,529 --> 00:35:51,003
No, just to say, yeah, I'm happy to agree to deadline five. Yeah.

486
00:35:54,708 --> 00:35:55,458
Happy to agree also.

487
00:35:58,338 --> 00:35:58,758
Thank you.

488
00:36:03,108 --> 00:36:07,188
Next question: Could Breckland District Council comment on whether the applicant's

489
00:36:07,218 --> 00:36:12,648
proposals for securing the final track alignment addresses this arboricultural

490
00:36:12,708 --> 00:36:14,688
concern regarding root protection areas?

491
00:36:17,779 --> 00:36:18,318
Simon Wood.

492
00:36:19,038 --> 00:36:22,848
Simon Wood, Breckland. I'll hand over to Michael Doyle if that's okay, sir.

493
00:36:22,908 --> 00:36:24,768
Thank you. Michael Doyle.

494
00:36:25,788 --> 00:36:27,949
Michael Doyle again on behalf of Breckland Council.

495
00:36:29,388 --> 00:36:32,373
Yes, the council acknowledges that the alignment remains indicative, and the

496
00:36:32,418 --> 00:36:34,818
commitment to offsets is helpful.

497
00:36:34,848 --> 00:36:37,683
However, the council would wish to ensure that the crossings of root protection

498
00:36:37,728 --> 00:36:39,618
areas are minimized through the final design.

499
00:36:43,699 --> 00:36:45,138
Any comments, Alex Tressiden?

500
00:36:48,468 --> 00:36:51,468
Thanks, Alex. On behalf of the applicant, no, nothing at this time. Thank you.

501
00:36:55,818 --> 00:36:59,328
Could the applicant provide an update regarding the disagreement with Norfolk

502
00:36:59,358 --> 00:37:03,723
County Council over its assertion that there are foreseeable negative impacts to

503
00:37:03,798 --> 00:37:09,093
trees adjacent to the highway that have not been assessed within Section 16.4 of

504
00:37:09,138 --> 00:37:10,338
the environmental statement?

505
00:37:11,748 --> 00:37:14,178
Thank you, Sir Alex. Just on behalf of the applicant,

506
00:37:15,438 --> 00:37:18,678
I think it's fair to say that the applicant disagrees with the assertion that there

507
00:37:18,693 --> 00:37:22,654
are foreseeable negative impacts to trees adjacent to the highway that haven't been

508
00:37:22,668 --> 00:37:25,068
assessed within the environmental statement.

509
00:37:25,128 --> 00:37:30,918
The arboricultural impact assessment provides a comprehensive assessment of the

510
00:37:31,008 --> 00:37:35,958
likely impacts on existing trees, groups of trees, woodlands, and hedgerows, and

511
00:37:36,048 --> 00:37:41,074
that assessment has been informed by, and is consistent with, the tree removal and

512
00:37:41,238 --> 00:37:45,888

management approaches set out in the vegetation removal plan, which is Appendix Two

513
00:37:45,949 --> 00:37:49,699
of the outline landscape and ecological management plan.

514
00:37:50,029 --> 00:37:54,873
We'd very much welcome further clarification on the matter from Norfolk County

515
00:37:54,918 --> 00:37:59,358
Council, including which specific trees are being referenced, and then obviously

516
00:37:59,418 --> 00:38:01,563
discussions can be progressed further.

517
00:38:02,958 --> 00:38:04,818
Thank you. Andrew Turokowski?

518
00:38:05,418 --> 00:38:07,652
Thank you, sir. Andrew Turokowski from Norfolk County Council.

519
00:38:08,029 --> 00:38:13,998
So we've got our own arboricultural officer, Tom Russell Grant, who will join

520
00:38:14,029 --> 00:38:15,199
us virtually and respond.

521
00:38:15,618 --> 00:38:16,158
Thank you.

522
00:38:17,598 --> 00:38:18,708
Tom Russell Grant.

523
00:38:22,068 --> 00:38:25,158
Yes. Hello. Tom Russell Grant on behalf of Norfolk County Council.

524
00:38:26,898 --> 00:38:31,998
Yes, I do agree that a lot of issues have been addressed within the submitted

525
00:38:32,208 --> 00:38:37,938
arboricultural information, but these are largely restricted to the direct

526
00:38:37,968 --> 00:38:43,368
conflicts with the accesses, and there doesn't appear to be any

527
00:38:43,878 --> 00:38:48,228
crossover between the requirements from the highway perspective for visibility

528
00:38:48,258 --> 00:38:51,858
splays, particularly with regard to hedges and those losses.

529
00:38:53,238 --> 00:38:58,098
In terms of detail, perhaps that's something more appropriate to take as an offline

530
00:38:58,128 --> 00:38:58,608
discussion.

531
00:39:00,138 --> 00:39:04,307
I think so. If the county council's advisor would be agreeable to it, it would be

532
00:39:04,338 --> 00:39:08,958
really helpful to set up a meeting between himself and the applicant's

533
00:39:09,228 --> 00:39:11,748
arboricultural advisor to discuss that matter then.

534
00:39:11,898 --> 00:39:15,858
They're not presently here with us today, but I think a meeting would be good to

535
00:39:15,949 --> 00:39:19,938
address those indirect impacts, and I'm sure agreement can be reached swiftly on

536
00:39:20,058 --> 00:39:20,538

the back of that.

537
00:39:22,038 --> 00:39:24,858
And we'll update the same on the ground accordingly, of course.

538
00:39:26,388 --> 00:39:30,678
So Simon from the council. Could I just ask that Tom Russell, our arboricultural

539
00:39:30,738 --> 00:39:33,558
officer, be plugged into that as well, please? Thank you.

540
00:39:34,293 --> 00:39:34,758
Certainly.

541
00:39:36,108 --> 00:39:37,008
Okay, thank you.

542
00:39:48,978 --> 00:39:53,118
Okay, I don't have any further questions on biodiversity, so I'll ask for

543
00:39:53,208 --> 00:39:56,178
contributions from interested parties in the room.

544
00:39:57,949 --> 00:40:03,558
I can see two hands up. Anne

545
00:40:03,828 --> 00:40:05,029
Mason.

546
00:40:05,208 --> 00:40:08,268
Anne Mason, Castle Acre Parish Council.

547
00:40:08,898 --> 00:40:14,358
Has the environmental assessment taken into account the effects of security

548
00:40:14,388 --> 00:40:16,728
lighting on nocturnal wildlife?

549

00:40:24,048 --> 00:40:25,008
Alex Tressiden.

550
00:40:25,638 --> 00:40:30,378
Sorry. Dr. Connolly on behalf of the applicant. Yes, the answer is it has.

551
00:40:30,498 --> 00:40:33,108
Obviously, security lighting limited to the

552
00:40:34,428 --> 00:40:38,478
VSS and substation areas. Excuse me.

553
00:40:39,498 --> 00:40:44,958
And there is a requirement for the lighting design scheme within the

554
00:40:46,788 --> 00:40:51,287
OLEMP, which would cover that.

555
00:40:53,478 --> 00:40:58,878
Are you able to provide a reference to help us navigate our way to that?

556
00:41:02,718 --> 00:41:04,248
If you just give us one moment, sir.

557
00:41:04,263 --> 00:41:04,368
Okay. Yeah. Thank you.

558
00:41:04,383 --> 00:41:09,738
We will try and find it. It may be that we come back in writing on that, but I'm

559
00:41:09,798 --> 00:41:10,818
just going to have a look.

560
00:41:25,593 --> 00:41:27,828
Thank you, sir. Alex Tressiden on behalf of the applicant.

561
00:41:28,128 --> 00:41:33,978
We've got paragraph 7.3.129 of the outline landscape and ecological

562
00:41:34,068 --> 00:41:38,043
management plan, which states, and I quote, that "A sensitive lighting strategy

563
00:41:39,258 --> 00:41:43,248
set out within the detail camp will specify where and how any artificial lighting

564
00:41:43,279 --> 00:41:47,928
will be used, which will serve to mitigate adverse impacts on ecological receptors

565
00:41:48,138 --> 00:41:49,338
such as bats, for example."

566
00:41:51,288 --> 00:41:53,449
Thank you.

567
00:42:00,618 --> 00:42:01,428
Mike Bennett.

568
00:42:02,958 --> 00:42:07,158
Thank you, sir. Mike Bennett, on behalf of Sporle Broad Parish Council.

569
00:42:08,088 --> 00:42:13,518
There are three issues I wanted to just speak and ask one or two

570
00:42:13,608 --> 00:42:17,808
questions on with regards to biodiversity.

571
00:42:17,898 --> 00:42:18,438
Firstly,

572
00:42:19,908 --> 00:42:21,798
impact of a mowing strategy.

573
00:42:23,208 --> 00:42:28,353
So much of the marketing material put out by solar developers show sheep grazing

574

00:42:28,428 --> 00:42:33,678
under solar arrays. However, in reality, this is by no means possible for all solar

575
00:42:33,738 --> 00:42:38,568
projects. The applicant acknowledges this and says that

576
00:42:38,628 --> 00:42:41,628
mowing will be the default position.

577
00:42:42,738 --> 00:42:48,678
This is the first question in

578
00:42:48,738 --> 00:42:53,449
regards to this. Therefore, can we assume that the mowing option has been included

579
00:42:53,538 --> 00:42:57,078
in the applicant's BNG calculations?

580
00:42:59,088 --> 00:43:04,668
If that is so, even so, our concerns are that with the increasing

581
00:43:04,699 --> 00:43:09,693
likelihood of seasonal droughts and heat waves, the mowing regimes will become

582
00:43:09,738 --> 00:43:14,298
increasingly important to prevent wildfires.

583
00:43:14,358 --> 00:43:18,768
However, these mowing machines will not provide the benefit to the soil condition

584
00:43:18,798 --> 00:43:23,298
and fertility of the now semi-permanent pasture because there would be no longer

585
00:43:23,388 --> 00:43:29,148
any manuring taking place as the OLEMP speaks of

586
00:43:29,268 --> 00:43:30,978

cut grass being collected.

587
00:43:32,208 --> 00:43:37,788
This would not even have the benefit of larger wildlife grazing and manuring as

588
00:43:37,818 --> 00:43:39,768
they would have been fenced out.

589
00:43:41,449 --> 00:43:45,798
Another concern is that the mowing regime will mean that areas beneath the arrays

590
00:43:45,858 --> 00:43:51,468
will need spraying to prevent growth of potential fireable vegetation.

591
00:43:51,558 --> 00:43:55,308
This will surely not improve the project's BNG credentials.

592
00:43:56,808 --> 00:44:01,308
Much of the site involves sloping fields covered with arrays.

593
00:44:01,368 --> 00:44:05,628
It is accepted that bare soil under the arrays is protected from rainfall.

594
00:44:06,078 --> 00:44:11,268
However, rainwater concentrated at the lower edge of arrays will provide a means of

595
00:44:11,358 --> 00:44:17,058
soil erosion, which will be exacerbated by any slope, something I've seen on other

596
00:44:17,148 --> 00:44:18,228
solar projects.

597
00:44:20,838 --> 00:44:26,449
It's noted that detail is provided on grass species and possible grazing and mowing

598

00:44:26,478 --> 00:44:32,313
regimes in the OLEMP. However, there does not seem to be any recognition of the

599
00:44:32,418 --> 00:44:37,699
dangers of long vegetation and wildfires in times of drought, such as experienced

600
00:44:37,728 --> 00:44:42,558
this year, and as we're told, increasingly likely in future years.

601
00:44:44,058 --> 00:44:49,998
Table 3.6 of the OLEMP says vegetation will be

602
00:44:50,029 --> 00:44:55,878
managed with machinery. There may be the opportunity for land beneath the PV panels

603
00:44:55,908 --> 00:45:01,279
to be grazed by sheep, although the ES assumes that all grassland will be managed

604
00:45:01,308 --> 00:45:03,199
by machinery as a default position.

605
00:45:04,699 --> 00:45:09,798
We contend that this is not tight enough and we would ask that in light of the

606
00:45:09,858 --> 00:45:15,018
concerns for soil condition and fertility, soil erosion, and particularly

607
00:45:15,078 --> 00:45:19,128
wildfires, that more detail should be included in the

608
00:45:20,118 --> 00:45:25,098
OLEMP of how this will be done.

609
00:45:26,538 --> 00:45:31,279
So that was the first thing I wanted to talk about. Second thing is about deer.

610
00:45:31,548 --> 00:45:34,398
I just wonder, should we take these items one at a time?

611
00:45:34,458 --> 00:45:34,728
Yes.

612
00:45:36,108 --> 00:45:37,188
Yeah. If that's-

613
00:45:37,308 --> 00:45:37,668
No problem.

614
00:45:40,608 --> 00:45:43,758
If you could give us the headlines of the other two. So the second is deer.

615
00:45:43,788 --> 00:45:44,538
What's the third one?

616
00:45:44,628 --> 00:45:46,848
I wanted to talk about overplanting.

617
00:45:46,908 --> 00:45:47,058
Okay.

618
00:45:47,148 --> 00:45:48,048
As in-

619
00:45:48,078 --> 00:45:48,949
I think we'll take them-

620
00:45:48,978 --> 00:45:49,473
... the size of the project.

621
00:45:49,548 --> 00:45:51,438
Yeah, let's take them separately then.

622
00:45:51,588 --> 00:45:53,418
Thank you, sir. Alex Tressiden on behalf of the applicant.

623

00:45:53,538 --> 00:45:56,478
I think what we might do is, if it's acceptable, is

624
00:45:58,038 --> 00:46:02,268
note these points, and in order to give a full and comprehensive response, I would

625
00:46:02,298 --> 00:46:04,968
like to take them away and consider them in detail and come back in writing.

626
00:46:04,998 --> 00:46:08,178
However, I think we have a couple of initial points we'd like to raise in the first

627
00:46:08,208 --> 00:46:11,237
one, and I propose we probably take a similar approach to the next two.

628
00:46:11,748 --> 00:46:12,018
Okay

629
00:46:13,123 --> 00:46:15,132
Dr Connolly on behalf of the applicant.

630
00:46:15,222 --> 00:46:20,232
Yeah, in terms of the question on BNG, absolutely the management of the grassland

631
00:46:20,502 --> 00:46:25,602
by any means, such as mowing or which would be suitable, is taken into account.

632
00:46:26,052 --> 00:46:29,172
We've undertaken a precautionary approach in terms of the value given to the

633
00:46:29,232 --> 00:46:32,248
grassland and the panels anyway, so that would be appropriate.

634
00:46:33,612 --> 00:46:37,961
In terms of the detail management, obviously there's a requirement in the outline

635
00:46:38,682 --> 00:46:40,752
LEMP that a detailed

636
00:46:42,342 --> 00:46:46,032
LEMP will be produced along with the detailed design.

637
00:46:46,123 --> 00:46:51,477
And so the precise detail of the management would also be more appropriate at that

638
00:46:51,522 --> 00:46:53,712
point.

639
00:46:57,102 --> 00:47:00,268
Okay. Thank you. Shall we take the second point there, Mr Bennett?

640
00:47:01,393 --> 00:47:02,232
Yeah. As

641
00:47:03,522 --> 00:47:09,192
most of us around this table realize that we at SPAW have consistently argued for

642
00:47:09,282 --> 00:47:14,292
more mitigation in relation to deer and the increased likelihood of accidents on

643
00:47:14,352 --> 00:47:19,932
the A1065. We welcome that there has been a revision of the design principles,

644
00:47:20,052 --> 00:47:24,132
parameters, and commitments at deadline three in relation to deer fencing along the

645
00:47:24,192 --> 00:47:29,022
A1065 to attempt to encourage deer to move away from the road.

646
00:47:30,102 --> 00:47:34,437
This is notwithstanding the need to reduce the visual impact by removing some, if

647
00:47:34,542 --> 00:47:40,152
not all, solar arrays along the A1065, as has been previously requested by

648
00:47:40,182 --> 00:47:46,047
Kelsale Parish Council. However, we would have three questions in relating to this

649
00:47:46,302 --> 00:47:52,197
revision. Firstly, has the applicant sought professional advice from

650
00:47:52,272 --> 00:47:57,192
those whose expertise is in the movement of deer through the landscape, for

651
00:47:57,252 --> 00:48:02,292
example, as to how wide the gap should be between a hedge and deer fencing?

652
00:48:02,382 --> 00:48:07,512
So that was question one. The second question, will the hedge along the

653
00:48:07,572 --> 00:48:13,377
A1065 be thick enough and high enough to prevent and deter deer from

654
00:48:13,393 --> 00:48:18,643
accessing the road? And will the fencing erected during the construction phase be

655
00:48:18,672 --> 00:48:22,873
in place long enough for that to be achieved? So that's question two.

656
00:48:23,232 --> 00:48:28,812
And the third question is: Is there any way that landowners can be

657
00:48:28,842 --> 00:48:34,452
required to manage the deer as part of their responsibilities within the agreements

658

00:48:34,542 --> 00:48:36,792
between them and the applicant?

659
00:48:41,562 --> 00:48:42,072
Okay.

660
00:48:44,052 --> 00:48:45,732
Thank you. Alex Rose on behalf of the applicant.

661
00:48:46,032 --> 00:48:49,482
Those are three helpful questions which we'll respond to fully in writing if that'd

662
00:48:49,512 --> 00:48:50,382
be acceptable.

663
00:48:52,212 --> 00:48:54,012
Okay. Thank you. And the third point.

664
00:48:54,702 --> 00:48:57,402
The third point was in relation to overplanting.

665
00:48:57,912 --> 00:49:03,402
The applicant's response to our questions in deadline two regarding

666
00:49:03,552 --> 00:49:09,492
scheme overplanting included a quote from paragraph 6110 of the Statement of

667
00:49:09,612 --> 00:49:15,432
Need document, which said, "Any optimization of layout at a detailed design

668
00:49:15,582 --> 00:49:20,742
stage would be unlikely to identify any areas of land which would be useful to keep

669
00:49:20,893 --> 00:49:25,722
out of the scheme for alternate use, for example, arable farming.

670
00:49:25,782 --> 00:49:30,822
This is because any such areas identified would be likely to be

around the edges of

671
00:49:30,912 --> 00:49:36,732
field margins and disconnected from any other areas similarly identified, and

672
00:49:36,792 --> 00:49:42,492
therefore would have little or no agricultural purpose." We would ask that

673
00:49:42,643 --> 00:49:48,552
areas freed up by layout optimization be used as an opportunity

674
00:49:48,612 --> 00:49:54,102
to intentionally create wide and dedicated wildlife corridors through the scheme,

675
00:49:54,732 --> 00:49:57,012
thereby improving the BNG.

676
00:50:00,192 --> 00:50:00,596
Thank you.

677
00:50:01,422 --> 00:50:04,047
Thanks. Alex Rose on behalf of the applicant.

678
00:50:04,123 --> 00:50:07,782
In order to make that commitment, we'd need to, as you can imagine, discuss with

679
00:50:07,842 --> 00:50:09,972
our client and can include that in the relevant documents.

680
00:50:10,032 --> 00:50:12,012
So we'll consider it and come back to you.

681
00:50:15,237 --> 00:50:19,602
Okay. Thank you. Any further questions? Dr Mark Holmes.

682
00:50:20,652 --> 00:50:21,522
Thank you.

683
00:50:22,812 --> 00:50:27,282
Dr Mark Holmes, local resident. I'd just like to make a further six to seven-minute

684
00:50:27,373 --> 00:50:32,082
submission. Thank you to the examiner for allowing me to speak today.

685
00:50:32,682 --> 00:50:37,123
I've made previous submissions, and I'd like to recap a little and then expand more

686
00:50:37,242 --> 00:50:39,792
on biodiversity and stone curlews.

687
00:50:41,322 --> 00:50:46,212
Just to say who I am, a recent retired medical doctor with a lifelong interest in

688
00:50:46,272 --> 00:50:48,042
natural history and nature conservation.

689
00:50:48,672 --> 00:50:52,692
I'm an elected fellow of Linnean and Natural History Society of London and a

690
00:50:52,722 --> 00:50:55,332
trustee of the Snettishall and Berburgh Butterfly Trust.

691
00:50:56,112 --> 00:51:01,167
More importantly, I'm a local resident, and for the last 30 years plus, I've been

692
00:51:01,212 --> 00:51:07,152
monitoring and recording the incredible and increasing biodiversity

693
00:51:07,242 --> 00:51:10,212
of the area of the planned Droves

694
00:51:11,502 --> 00:51:13,753
industrial-scale solar project.

695
00:51:14,772 --> 00:51:20,383
In my May 2026 verbal submission, I listed some of the many mammals, birds,

696
00:51:20,472 --> 00:51:26,413
butterflies, insects, orchids, et cetera, that have been found or seen in the

697
00:51:26,442 --> 00:51:28,753
immediate vicinity of the Droves site.

698
00:51:29,353 --> 00:51:31,603
I won't repeat that list, you'll be glad to know.

699
00:51:31,992 --> 00:51:36,732
I would today like to highlight just a couple of examples of what would be lost if

700
00:51:36,792 --> 00:51:41,082
this massive 2,800 acre solar project was allowed to proceed.

701
00:51:42,582 --> 00:51:44,472
There's a little bit of a cross with

702
00:51:45,913 --> 00:51:51,402
Mike on deer, but very importantly, I've seen red deer nearly the size of a horse

703
00:51:51,522 --> 00:51:53,982
galloping at 40 miles an hour through the Droves site.

704
00:51:55,032 --> 00:51:58,123
That, in its current form, obviously will not be occurring.

705
00:51:59,322 --> 00:52:03,373
I've also witnessed a bevy, a family party of up to eight graceful roe deer

706
00:52:03,822 --> 00:52:08,503
bounding across the solar site, a little bit like a scene from the African savanna.

707
00:52:09,192 --> 00:52:11,322
That also will sadly be lost.

708
00:52:12,822 --> 00:52:17,878
This summer, 2026, in the middle of a very productive irrigated onion field on the

709
00:52:17,922 --> 00:52:22,332
Droves site, I had the pleasure of seeing a female oystercatcher with her fluffy

710
00:52:22,692 --> 00:52:28,062
black and white chicks, these chicks being successfully raised in this beautiful

711
00:52:28,212 --> 00:52:31,123
arable landscape. Again, something that will be lost.

712
00:52:32,712 --> 00:52:38,636
I now come on arguably to the most important resident denizen of the Droves

713
00:52:38,711 --> 00:52:43,391
site, the nationally rare and Schedule 1 protected stone curlew, also known as the

714
00:52:43,452 --> 00:52:48,042
Norfolk plover, which I think is an important alternative name for this very

715
00:52:48,072 --> 00:52:53,682
important bird. Clearly, the stone curlew is a much rarer bird than the larger

716
00:52:53,742 --> 00:52:57,491
Eurasian curlew, which is also present and breeding in the area.

717
00:52:58,542 --> 00:53:03,192
Multiple sightings of the elusive stone curlew were made in the Droves area in 2024

718
00:53:03,222 --> 00:53:08,802

and 2025. However, in 2025, there was good evidence of stone curlews

719
00:53:08,862 --> 00:53:13,302
breeding in the Droves site, with a pair of birds seen in the spring and an

720
00:53:13,332 --> 00:53:17,052
apparent family party of four birds seen in the autumn.

721
00:53:17,472 --> 00:53:21,342
This is consistent with successful breeding of a bird species that is known to be

722
00:53:21,402 --> 00:53:27,312
highly elusive and secretive. The stone curlews follow crop rotations, and the

723
00:53:27,373 --> 00:53:33,103
current Droves project would put a stop to stone curlews breeding on this site.

724
00:53:34,782 --> 00:53:40,692
The current and very limited IGP mitigation proposals are in no way appropriate

725
00:53:40,753 --> 00:53:45,822
for these stone curlews, with respect. The Droves site is functionally linked.

726
00:53:46,542 --> 00:53:50,142
I think it's very important that it is functionally linked to the adjacent

727
00:53:50,232 --> 00:53:55,332
Breckland Special Protection Area, and this makes the possible location at the

728
00:53:55,392 --> 00:53:59,082
Droves site for a massive solar farm all the more inappropriate.

729
00:54:00,163 --> 00:54:05,442
To reiterate, stone curlews follow crop rotations, especially of

730
00:54:05,472 --> 00:54:11,322
spring-sown crops. Stone curlews may therefore move with crop rotation, hence

731
00:54:11,952 --> 00:54:15,883
only being recorded at a particular site every four or five years.

732
00:54:16,542 --> 00:54:21,476
I have therefore previously stated that a minimum of five years of professional and

733
00:54:21,552 --> 00:54:27,133
licensed, as it is a Schedule 1 protected bird, stone curlew recording

734
00:54:27,612 --> 00:54:33,373
work is required and should be carried out to determine the stone curlew breeding

735
00:54:33,492 --> 00:54:39,373
status before any final decision is made on the Droves solar project.

736
00:54:39,957 --> 00:54:44,952
And I therefore look forward to receiving a verbal answer on this at this final

737
00:54:45,072 --> 00:54:47,413
public hearing, either today or tomorrow.

738
00:54:48,552 --> 00:54:53,532
With respect, I must also state that the RSPB and others have pointed out that the

739
00:54:53,623 --> 00:54:58,753
current ecological survey work previously arranged by IGP is inadequate and

740
00:54:58,842 --> 00:55:02,682
structurally unsafe to assess the status of stone curlews.

741
00:55:03,462 --> 00:55:08,022

In addition, and very importantly for the ecology of the Droves site, whole groups

742
00:55:08,082 --> 00:55:12,538
of insects for which Breckland is famous do not appear to have been surveyed with

743
00:55:12,582 --> 00:55:15,861
appropriate- Multi-season physical survey work.

744
00:55:16,566 --> 00:55:20,797
This is why I would argue that Natural England have, at this stage, only given

745
00:55:20,826 --> 00:55:26,316
approval to IGP on the basis of inadequate survey information, largely based on now

746
00:55:26,736 --> 00:55:29,406
outdated 2024 survey work.

747
00:55:31,146 --> 00:55:34,746
Like many other, and I am coming towards the end of my submission.

748
00:55:35,436 --> 00:55:40,131
Like many other developed countries, we in the UK do already have a biodiversity

749
00:55:40,206 --> 00:55:45,996
crisis. Our British countryside is extremely nature-depleted, and the very latest

750
00:55:46,057 --> 00:55:51,501
research on large-scale solar projects in China, published this August in the

751
00:55:51,606 --> 00:55:56,946
Journal of Science, shows a doubling the loss of bird biodiversity on these

752
00:55:57,036 --> 00:56:02,406
large-scale solar sites. The only exception was solar sites in desert areas,

753
00:56:03,246 --> 00:56:03,996
understandably.

754
00:56:05,256 --> 00:56:09,486
Our British government has signed up to increasing, not decreasing, national

755
00:56:09,576 --> 00:56:14,481
biodiversity targets. These are enshrined in law in the Environment Act of

756
00:56:14,616 --> 00:56:20,166
2021. This act includes halting species decline by 2030 and

757
00:56:20,226 --> 00:56:25,236
increasing species abundance by at least 10% between 2030 and

758
00:56:25,416 --> 00:56:30,981
2042. So we have yet another reason for objecting to

759
00:56:31,027 --> 00:56:36,471
this massive solar project. Hence, and to finish my submission

760
00:56:36,486 --> 00:56:41,076
today, I'm appealing to our examiner on the grounds of biodiversity loss and

761
00:56:41,136 --> 00:56:45,471
stone-curlew loss and for the many other valid objections that have been raised,

762
00:56:45,786 --> 00:56:50,541
and will be raised tomorrow, to please stop this industrial-scale solar project.

763
00:56:51,052 --> 00:56:53,616
This is not an appropriate location.

764
00:56:53,706 --> 00:56:58,986
If indeed green energy is needed from this site, then the evidence presented by IGP

765
00:56:59,016 --> 00:57:03,741
does not appear to exclude the siting of wind turbines in the southeast area of the

766
00:57:03,816 --> 00:57:08,797
site, which would then be very near to the present large wind turbines just north

767
00:57:08,856 --> 00:57:12,726
of Soham and well away from the RAF Marham flight path.

768
00:57:13,326 --> 00:57:18,756
This would then, at the same time, largely preserve current biodiversity, preserve

769
00:57:18,786 --> 00:57:22,716
arable farming rotations, and maintain our food security.

770
00:57:23,587 --> 00:57:25,297
Thank you for your consideration today.

771
00:57:27,922 --> 00:57:30,606
Thank you, Dr. Holmes. Alex Treston.

772
00:57:32,256 --> 00:57:36,741
Thank you, sir. Alex Treston on behalf of the applicant. I'm grateful to Dr.

773
00:57:36,906 --> 00:57:39,951
Holmes for his submissions, though I do feel that we're veering into

774
00:57:41,226 --> 00:57:45,261
submissions that are suited to the open floor hearing that we have tomorrow,

775
00:57:45,337 --> 00:57:51,036
specifically for interested parties to raise items that are not on the agenda for

776
00:57:51,096 --> 00:57:56,196
this issue-specific hearing to. I look at Curlews as an example of

that, both stone

777
00:57:56,256 --> 00:58:01,656
and Eurasian. Dr. Holmes also referenced the fact that he's made these

778
00:58:01,716 --> 00:58:03,846
submissions throughout the examination today.

779
00:58:03,936 --> 00:58:08,346
I would therefore respond by saying that the applicant has therefore responded to

780
00:58:08,376 --> 00:58:12,006
those points in the examination to date as well, because the applicant, every

781
00:58:12,036 --> 00:58:15,636
submission gets made, whether it's at a hearing or in written submissions, is

782
00:58:15,666 --> 00:58:19,297
responded to in detail in writing by the applicant at the next deadline.

783
00:58:19,596 --> 00:58:24,396
And as you noted at the start of the hearing, sir, there's no greater weight placed

784
00:58:24,486 --> 00:58:29,930
on submissions made orally at a hearing when compared to submissions made in

785
00:58:29,946 --> 00:58:35,587
writing. I'd also encourage Dr. Holmes, as he has done thus far,

786
00:58:36,126 --> 00:58:41,256
to submit these representations in writing and accompany them with sufficient

787
00:58:41,316 --> 00:58:45,846
evidence to detail the claims that he's making, particularly in relation to various

788
00:58:45,936 --> 00:58:48,606
sightings and other points made in his submission.

789
00:58:49,177 --> 00:58:52,866
Given that the majority of what was covered isn't on the agenda for this

790
00:58:52,896 --> 00:58:56,706
issue-specific hearing, I look forward to hearing it in the open floor hearing

791
00:58:56,766 --> 00:59:01,041
tomorrow as well, and I expect that the applicant will come back in writing on all

792
00:59:01,087 --> 00:59:04,191
matters that haven't previously been addressed at deadline four.

793
00:59:06,307 --> 00:59:06,996
Okay. Thank you.

794
00:59:10,656 --> 00:59:12,337
Any final comments in the room?

795
00:59:16,206 --> 00:59:18,996
No. Any hands online?

796
00:59:21,036 --> 00:59:21,996
Not seeing any.

797
00:59:23,976 --> 00:59:29,166
Okay, I'll just summarize the action points for biodiversity, and then we'll

798
00:59:29,976 --> 00:59:33,996
break for lunch in a few minutes. So the first action was,

799
00:59:36,366 --> 00:59:40,100
biodiversity net gain. So responses from

800

00:59:41,346 --> 00:59:45,876
Borough Council of Kings Lynn and West Norfolk, and from Breckland District Council

801
00:59:45,966 --> 00:59:51,756
for deadline five. There was a meeting to address impacts from

802
00:59:51,816 --> 00:59:54,576
trees with Norfolk County Council.

803
00:59:57,846 --> 01:00:03,126
And response from the applicant on the three points to Mr.

804
01:00:03,396 --> 01:00:07,896
Bennett's concerns on mowing, deer, over-planting.

805
01:00:10,057 --> 01:00:13,956
Sir, would you mind if I just asked a quick query on that particular action,

806
01:00:14,047 --> 01:00:14,376
please?

807
01:00:14,466 --> 01:00:14,646
Yeah.

808
01:00:14,736 --> 01:00:16,866
I just want to clarify with Mr. Bennett.

809
01:00:17,106 --> 01:00:22,146
It's your intention to submit the points that you've made today in writing at

810
01:00:22,177 --> 01:00:27,427
deadline four. As in, would you prefer us to therefore see those in full and then

811
01:00:27,456 --> 01:00:31,146
respond at deadline five? Or would you rather we did our responses based on what

812
01:00:31,177 --> 01:00:33,427