

The Drovers Solar Farm

Written Summary of Applicant's Oral Submissions at OFH2

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1 Introduction

- 1.1.1 This document summarises the oral submissions made by The Drovers Solar Farm Limited (the Applicant) at Open Floor Hearing 2 (OFH2) held on Wednesday 9 September 2026 in relation to the application for development consent (the DCO Application) for The Drovers Solar Farm (the Scheme).
- 1.1.2 The Examining Authority (the ExA) did not request further information from the Applicant on any matters discussed during OFH2, nor did the Applicant undertake to provide further information during the course of OFH2. However, at the time of finalising this submission (at 15:00 on 16 September 2026), the ExA's list of Action Points for all hearings during w/c 7 September 2026 had not been published on the project website on the Planning Inspectorate's portal. The Applicant will review the ExA's Action Points, once published, and provide responses to any outstanding actions (to the extent that there are any, in relation to OFH2) at Deadline 5.
- 1.1.3 Therefore, it is solely the Applicant's oral submissions made during OFH2 that are summarised in this document. This document does not detail the oral submissions of other parties, and only includes a summary of the topics raised by each speaker to provide context for the Applicant's oral submissions.



2 Written Summary of Applicant's Oral Submissions at Open Flooring Hearing 2

2.1.1 **Table 1-1** below provides a summary of the Applicant's oral submissions at OFH2.

Table 1-1 Applicant's Summary of Oral Submissions

#	Agenda Item	Summary of Submissions
1	Welcome, introductions and arrangements for the hearing	The following parties were present at the hearing: • Anthony Johnson, the ExA. • Alex Tresadern, Senior Associate at Pinsent Masons LLP, the solicitors for the Applicant. • George Freeman MP, Mid Norfolk. • James Wild MP, North West Norfolk. • [REDACTED], Sporle with Palgrave Parish Council. • [REDACTED], Castle Acre Parish Council. • [REDACTED], Castle Acre Parish Council. • Anthony Morgan, individual representative.
2	The purpose of the hearing	The ExA explained that the purpose of the hearing was to enable Interested Parties (IPs) to raise any matters to the ExA for its consideration of the application. Alex Tresadern, on behalf of the Applicant, did not speak on this agenda item.
3	Confirmation of those who have notified the ExA of a wish to be heard at the hearing	A list of those who spoke at OFH2 is provided above. Alex Tresadern, on behalf of the Applicant, did not speak on this agenda item.
4	Oral representations from Interested Parties (IPs) and any non-IPs	Oral submissions were made by George Freeman MP, James Wild MP, [REDACTED], [REDACTED], [REDACTED] and Anthony Morgan. The Applicant has not repeated the submissions of these IPs in full in this document, as that is not its purpose, but has summarised the topics raised by each IP in their submissions as follows: <u>George Freeman MP</u> • Policy and process. • Cumulative assessment. • Scale. <u>James Wild MP</u> • Site selection. • Agricultural land and soils. • Ministry of Defence objections and mitigation. • Heritage and landscape/visual impacts. • National Grid Substation location. [REDACTED] • Agricultural land. • Cumulative assessment in the context of High Grove Solar.



		██████████ • Site selection. • Agricultural land. • Grid connection. • Traffic management and road safety, including views from the A1065. • Community benefits. • Identifying documents and meaningful engagement. ██████████ • Heritage and archaeology. • Landscape impacts. <u>Anthony Morgan</u> • Agricultural land and food production. • Site selection and scale, including rooftop solar. • Grid connection, capacity and efficiency. Alex Tresadern, on behalf of the Applicant, did not speak on this agenda item.
z	Responses by the Applicant	Post Hearing Note: <i>The Applicant wishes to note that it has reviewed, in full, the oral submissions made by IPs at OFH2. The Applicant notes that the matters raised are all responded to in full in writing across the suite of documents submitted by the Applicant into the examination. In particular, the Applicant refers to the Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [APP/8.22] and the Applicant's Response to Deadline 3 Submissions [APP/8.21]. The Applicant therefore considers that (across those, and other, documents) it has provided a full and comprehensive response to each matter/topic raised by the IPs in OFH2, but for the sake of completeness the Applicant has summarised its oral submissions made by its representative in OFH2 below.</i> Alex Tresadern, on behalf of the Applicant, began by thanking the IPs for attending OFH2 and making their submissions. Mr Tresadern noted that all IPs who made submissions at OFH2 are required to submit these submissions in writing at Deadline 4, and noted that the Applicant would therefore review these submissions and respond (to the extent that the Applicant has not already responded, including in submissions below and the documents referred to in the post hearing note above) at Deadline 5. <u>Policy and Process</u> In response to submissions made by George Freeman MP for Mid Norfolk, in relation to the process of the examination, Mr Tresadern explained it is not for this examination process to discuss the process or policies of government, i.e. the merits of National Policy Statements. Mr Tresadern noted that those National Policy Statements place a strong presumption in favour of development, such as the Scheme, and referenced the Statement of Need [APP-042] regarding the critical national need for this Scheme. Mr Tresadern noted that this is the process for which the Scheme will be examined and decided, and there should be nothing further discussed on that matter. <u>Cumulative Assessment</u> In response to submissions made by Mr Freeman, in relation to the cumulative impact of the Scheme, Mr Tresadern explained that these submissions are contained in detail in Mr Freeman's Written Representation [REP1-102] and the Applicant has therefore responded to those submissions in detail in the Applicant's Response to Written Representations and other Deadline 1 Submissions [REP2-028]. In summary, the Applicant's assessment of cumulative effects had been undertaken in line with the requirements of the Environmental Impact Assessment Regulations and the Planning Inspectorate's advice note on Cumulative Effects Assessment. The approach to cumulative assessment is detailed in ES Chapter 2: EIA Process and Methodology [APP-051] and ES Appendix 2.4: Cumulative Schemes [REP3-063]. Cumulative assessments within each of the technical topic chapters have been undertaken in accordance with the relevant topic specific guidance and best practice approach, in all cases assessing a reasonable worst-case scenario. Mr Tresadern explained that the Scheme adopts a mitigation hierarchy to minimise cumulative impacts as far as reasonably practicable. Throughout the Applicant's site evaluation and iterative design, sensitive environmental receptors are avoided as much as possible, and that reduced the potential for in-combination effects with other developments. That approach is reinforced



by embedding mitigation directly into the Scheme, including the strategic positioning of infrastructure away from receptors, the layouts being informed to limit the use of Grades 1 & 2 agricultural land and the incorporation of buffers and green infrastructure.

Scale

In response to submissions made by Mr Freeman, in relation to the scale of the Scheme, Mr Tresadern referred to the **Written Summary of the Applicant's Oral Submissions and Responses to Action Points at Open Floor Hearing 1 [REP1-070]**, where this matter had been dealt with at length (alongside various other written submissions into this examination), but in summary the Applicant is a solar developer and the Scheme is therefore a large-scale solar scheme (and not a wind farm, as the **Statement of Need [APP-042]** sets out in great detail). The scale of the Scheme has been carefully considered, balancing the need to maximise the grid capacity, in line with government policy, whilst also making the most efficient use of the land and avoiding impacts as far as practicable. The **Planning Statement [AS-076]** and the **Statement of Need [APP-042]** set out in full the justification for the Scheme and its proposed scale within the context of the important clear and urgent national need for low carbon energy generation. Mr Tresadern also noted that, during OFH2, there was discussion about the impacts of climate change in the context of agricultural land, and he noted that climate change is precisely what developments such as the Scheme are attempting to combat.

Site Selection

In response to submissions made by **James Wild MP for North West Norfolk**, in relation to site selection, Mr Tresadern explained that Appendix 1 of the **Planning Statement [AS-076]** contains the Site Evaluation Report, which details the process followed in selecting the site location. The Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors, including consideration of designated international and national ecological and geological sites, nationally designated landscapes, ancient woodland, flooding and heritage and archaeological concerns. **ES Chapter 4: Reasonable Alternatives and Design Evolution [REP3-028]** and Appendix 1 of the **Planning Statement [AS-076]** also explain the methodology that has been applied when identifying and evaluating potential sites for the Scheme.

Agricultural Land and Soils

In response to submissions made by Mr Wild, in relation to agricultural land and soils, Mr Tresadern noted that this was discussed at length during Issue Specific Hearing 2, and therefore referred to the **Written Summary of the Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [APP/8.22]** on this matter.

Ministry of Defence Objections and Mitigation

In response to submissions made by Mr Wild, in relation to aviation, Mr Tresadern noted that this was discussed at length during Issue Specific Hearing 2, and therefore referred to the **Written Summary of the Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [APP/8.22]** on this matter.

However, Mr Tresadern did note that the Applicant's mitigation (i.e. bunds and/or fences) for the impacts on Precision Approach Radar (PAR) at RAF Marham cannot be higher than 4.5m, as this is secured in the **Design Principles, Parameters and Commitments [APP/5.8.4]** and certified under Schedule 13 of the **draft DCO [APP/3.1.4]**. Therefore, Mr Tresadern noted that the Applicant would be committing a criminal offence (i.e. breaching the terms of a statutory instrument) if it built mitigation for the impacts on PAR at RAF Marham that exceeded these parameters. Further, the requirement that will be added to the **draft DCO [APP/3.1.4]** (once agreed with the Ministry of Defence) will require a detailed mitigation plan to be submitted to and approved by the relevant planning authority, in consultation with the Ministry of Defence. To suggest that the relevant planning authority (i.e. the Council) will not have a chance to comment on these mitigation proposals is, therefore, simply and factually incorrect.

National Grid Substation Location

In response to submissions made by Mr Wild, in relation to the location of the National Grid Substation, Mr Tresadern referred to the **Written Summary of the Applicant's Oral Submissions and Responses to Action Points at Open Floor Hearing 1 [REP1-070]**, where this matter had been dealt with at length (alongside various other written submissions into this examination).

Cumulative Assessment – High Grove Solar

In response to submissions made by [REDACTED], for **Sporle with Palgrave Parish Council**, in relation to the cumulative impact of the Scheme in combination with High Grove Solar, Mr Tresadern noted that this was discussed at length during Issue Specific Hearing 2, including in the context of agricultural land, and therefore referred to the **Written Summary of the Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [APP/8.22]** on this matter. However, Mr Tresadern did note that the Scheme has undertaken appropriate cumulative assessment with the information currently available to it from High Grove Solar, and that it will be for the developer of High Grove Solar to undertake its own cumulative assessment when the DCO application is submitted for that development.

Identifying Documents and Meaningful Engagement



		In response to submissions made by [REDACTED], for Castle Acre Parish Council, in relation to the volume of documents and meaningful engagement, Mr Tresadern acknowledged that there are a large number of documents submitted into the examination and that it can be difficult to identify which document is necessary to be read in relation to which matter. Mr Tresadern explained that if it would be helpful, the Applicant could direct [REDACTED] or any of the IPs to the appropriate documents (including in relation to all matters raised by [REDACTED], and the other IPs, in OFH2) that have already been submitted into the examination. In respect of meaningful engagement, Mr Tresadern agreed with the necessity of this and noted that the Applicant will continue this throughout the remainder of the examination and beyond, i.e. it does not cease once the examination is concluded. <u>Views from the A1065</u> [REDACTED] also requested additional views from the A1065, to which Mr Tresadern responded that these had already been submitted into the examination in the Technical Information Note – Landscape and Visual [REP3-083]. <u>Heritage, Landscape and Archaeology</u> In response to submissions made by [REDACTED], for Castle Acre Parish Council (and other IPs), in relation to impacts on heritage, archaeological and landscape receptors, Mr Tresadern noted that (amongst other documents) these were discussed at length during Issue Specific Hearing 1, and therefore referred to the Written Summary of the Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071] on these matters. Further, Mr Tresadern noted that several of these points are included in Castle Acre Parish Council's Responses to ExQ2 [REP3-097], and therefore the Applicant has addressed these in full in the Applicant's Response to Deadline 3 Submissions [APP/8.21]. <u>Rooftop Solar and Efficiency</u> In response to submissions made by Anthony Morgan, local resident, in relation to rooftop solar, Mr Tresadern noted that the Statement of Need [APP-042] and the suite of National Policy Statements make it very clear that both rooftop solar and large-scale solar generation are necessary. Mr. Morgan also referenced scale and site selection, which the Applicant has already covered, and which has been covered at length throughout the examination. In relation to efficiency, Mr Tresadern again referred to the Statement of Need [APP-042] in this regard. <u>Concluding Remarks</u> Mr Tresadern concluded by thanking the IPs for their submissions during OFH2 and their engagement throughout the examination. The Applicant also refers to the post hearing note above regarding its full responses to all matters raised during OFH2.
6	Close of the hearing	The ExA closed the hearing. Alex Tresadern, on behalf of the Applicant , did not speak on this agenda item.



THE DROVES
SOLAR FARM