Planning Inspectorate

Application by The Droves Solar Farm Limited for The Droves Solar Farm

Norfolk County Council's Responses to the Examining Authority's written questions and requests for information (ExQ3):

Issued on 29 September 2026 Responses are due by deadline 5: Friday 16 October 2026

The following table sets out the Examining Authority's (ExA's) written questions and requests for information – ExQ3.

Questions are set out using an issues-based framework derived from the initial assessment of principal issues provided as **annex D** to the Rule 6 Letter dated 8 April 2026. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which interested parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number. When you are answering a question, please start your answer by quoting the unique reference number.

You should respond to the questions by using the **Have your say** function on the project page of the National Infrastructure website and selecting 'Responses to Examining Authority's Third Written Questions (ExQ3)' when asked.

If you are responding to a small number of questions, you can submit your answers by choosing 'Make a comment' and entering your answers in the 'Your comments' box. If you are answering a larger number of questions you should download a copy of the Microsoft Word version of the document, enter your answers and save the document using an appropriate file name. You can then submit the completed document by selecting 'Upload files'.

Microsoft Word version: Examining Authority's Written Questions 03 (ExQ3)

Download a copy of this Microsoft Word version of the ExA's written questions, enter your answers and save the document using an appropriate file name. You can then submit the completed document by choosing 'Make a comment' and selecting 'Upload files'.

Abbreviations used:

BESS	Battery Energy Storage System
BCKLWN	Borough Council of King's Lynn and West Norfolk
BDC	Breckland District Council
D	Deadline
dDCO	draft Development Consent Order
DIO	Defence Infrastructure Organisation
ES	Environmental Statement
ExA	Examining Authority
ISH	Issue Specific Hearing
LIR(s)	Local Impact Report(s)
LLFA	Lead Local Flood Authority
NCC	Norfolk County Council
NESO	National Energy System Operator
NGET	National Grid Electricity Transmission plc
NPS	National Policy Statement
oCEMP	outline Construction Environmental Management Plan
oLEMP	outline Landscape and Ecological Management Plan
oOEMP	outline Operational Environmental Management Plan
PAR	Precision Approach Radar
PV	Photo-voltaic
R	Requirement
RAF	Royal Air Force
SoCG	Statement of Common Ground
TPO	Tree Preservation Order

The Examination Library

References in these questions set out in square brackets (for example [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link: XCAT01 - Examination Library template

It will be updated as the examination progresses.

Citation of questions

Questions in this table should be cited as follows:

Question reference: issue reference: question number, for example ExQ3 Q1.0.1 – refers to question 1 in this table.

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ExQ3	Question to:	Question:
1.	**General and cross-topic questions**	
Q1.0.1	The applicant Anglian Water Borough Council King's Lynn and West Norfolk Breckland District Council Defence Infrastructure Organisation Norfolk County Council Environment Agency Historic England Natural England National Energy System Operator National Grid Electricity Transmission plc National Highways Norfolk Wildlife Trust	**Statements of Common Ground** Further to the Rule 6 letter [PD-006], could the applicant and parties listed please ensure that up to date Statements of Common Ground (SoCG) with NCC are provided at deadline (D) 5?
	NCC Response	NCC has provided comments to the Applicant to be included in the updated version of the Statement of Common Ground (SoCG) provided at Deadline 5
8.	**Flood risk, hydrology and water resources**	
Q8.0.1	Norfolk County Council as the LLFA	**Lifetime of development** With reference to item NCC 9-2 of NCC's Statement of Common Ground [REP3-018], could the LLFA clarify how many years it considers would reflect the full development lifetime and why?

	NCC Response	The full lifetime of the scheme has not been calculated. At present, the applicant states the temporary 60 year operational lifetime of the scheme has been presented. Paragraph 006 National Planning Policy Guidance for Flood Risk and Coastal Change (Published September 2025) states "The lifetime of a non-residential development depends on the characteristics of that development, but a period of at least 75 years is likely to form a starting point for assessment." The applicant has confirmed the Solar Panels will be replaced at least every 30 years, equating to at least once during the site's operation. The applicant also confirms the BESS units would be replaced roughly every 10 years, which equates to at least 5 times during the site's operational phase. The applicant then confirms the National Grid Substation being constructed to facilitate the development is permanent. The permanent National Grid Substation to facilitate the development along with the continual replacement of the temporary proposed Solar PV Arrays and the BESS units, leads the LLFA to consider whether the development is permanent. On consideration of NPPG, the characteristics of the proposed development identified by the applicant demonstrates the replaceability of key elements combined with a permanent connection to the National Grid, meaning the proposed development's operational lifetime could easily extend beyond 60 years. In addition, the duration of the construction and decommissioning phases have not been clearly identified within either the flood risk assessment or the wider environmental impact assessment. These phases would result in additional years at the start and end of the development's lifetime. The development's lifetime is relevant to the assessment of flood risk as it impacts the assessment of future flood risk within the Environmental Impact Assessment, the Flood Risk Assessment, the Surface Water Drainage Design and the hydraulic modelling that supports the design and assessment. At present, there is not enough information from the applicant to determine the full lifetime of the proposed development. However, based "on the characteristics of that development" it would appear the development is permanent rather than temporary. Therefore, the design and associated assessments should be updated to reflect a permanent design approach.

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