THE DROVES
SOLAR FARM

The Droves Solar Farm

Applicant's Response to Deadline 4 Submissions

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1. Introduction

1.1. Purpose of the Document

1.1.1. This document has been prepared on behalf of The Droves Solar Farm Limited (the Applicant) in relation to an application (the DCO Application) for a Development Consent Order (DCO) to be made to the Secretary of State (SoS) to construct, operate and maintain, and decommission The Droves Solar Farm (the Scheme), pursuant to the Planning Act 2008 (PA 2008).

1.1.2. This document provides the Applicant's response to representations submitted to the Examining Authority (ExA) at Deadline 4 of the Examination of the DCO Application.

1.1.3. A total of 24 documents were submitted at Deadline 4 by Interested Parties. All submissions were published on the Planning Inspectorate's website on 18 September 2026.

1.1.4. Where paragraphs or sections of the above submissions have not been included, this has been done where the Applicant does not have any commentary to make on the text provided. This is done only for passages where submissions refer to factual statements, make repetition of text from the Applicant's documents, or where there is direct quoting of local policy or guidance to which the Applicant has already responded to within the DCO Application documents.

1.2. Structure and Scope of the Report

1.2.1. This document provides a response from the Applicant to the matters raised at Deadline 4 and is structured as follows:

- **Section 2** presents the submissions by the local authorities and are responded to in full by the Applicant
- **Section 3** presents the submissions by prescribed bodies and are responded to in full by the Applicant;
- **Section 4** presents the submissions by elected officials and are responded to in full by the Applicant; and,
- **Section 5** presents the submissions by members of the public and are responded to in full by the Applicant.

1.2.2. **Table 1-1** provides a breakdown of the scope of this document and details where a Deadline 4 submission, if relevant, has been responded to.

Table 1-1: Table of Deadline 4 submissions, as organised by the sections of this document

Deadline 4 submission reference	Responded to in this document?	Reason
Section 2		
Borough Council of Kings Lynn and West Norfolk (ISH2 Written Summary) [REP4-041]	Yes	The Applicant wishes to respond to points made in this submission.
Borough Council of Kings Lynn and West Norfolk (ISH3 Written Summary) [REP4-042]	Yes	The Applicant wishes to respond to points made in this submission.
Breckland Council (Standalone Submission Following Issue Specific Hearing 3) [REP4-043]	Yes	The Applicant wishes to respond to points made in this submission.
Norfolk County Council (Deadline 4 Submission) [REP4-044]	Yes	The Applicant wishes to respond to points made in this submission.
Castle Acre Parish Council (Written Summary of Oral Submission made at OFH2) [REP4-045]	No	The submission provides a summary of the oral submission made at OFH2. The Applicant does not have any comments to make on this submission.
Sporle with Palgrave Parish Council (Written Summary of Oral Submission made at OFH2) [REP4-046]	No	The submission provides a summary of the oral submission made at OFH2. The Applicant does not have any comments to make on this submission.
Sporle with Palgrave Parish Council (Written Summary of Oral Submission made at ISH2) [REP4-047]	No	The submission provides a summary of the oral submission made at ISH2. The Applicant does not have any comments to make on this submission.
Sporle with Palgrave Parish Council (Written Summary of Oral Submission made at ISH2) [REP4-048]	No	The submission provides a summary of the oral submission made at ISH2. The Applicant does

		not have any comments to make on this submission.
Sporle with Palgrave Parish Council (Written Summary of Oral Submission made at ISH2) [REP4-049]	No	The submission provides a summary of the oral submission made at ISH2. The Applicant does not have any comments to make on this submission.
Sporle with Palgrave Parish Council (Written Summary of Oral Submission made at ISH3) [REP4-050]	No	The submission provides a summary of the oral submission made at ISH3. The Applicant does not have any comments to make on this submission.
Sporle with Palgrave Parish Council (Written Summary of Oral Submission made at ISH3) [REP4-051]	No	The submission provides a summary of the oral submission made at ISH3. The Applicant does not have any comments to make on this submission.
Sporle with Palgrave Parish Council (Representation at Deadline 4 – Following ASI) [REP4-052]	Yes	The Applicant wishes to respond to points made in this submission.
Borough Council of Kings Lynn and West Norfolk (Responses to Deadline 3 Submissions) [REP4-060]	Yes	The Applicant wishes to respond to points made in this submission.
Castle Acre Parish Council (further submission) [REP4-062]	Yes	The Applicant wishes to respond to points made in this submission.
Section 3		
National Highways [REP4-063]	Yes	The Applicant wishes to respond to points made in this submission.
National Highways [REP4-053]	No	The submission provides a summary of the oral submission made at ISH2. The Applicant does not have any comments to make on this submission.
National Highways [REP4-054]	Yes	The Applicant wishes to respond to points made in this submission.
Environment Agency [AS-087]	No	The Applicant does not have any comments to make on this

		submission as the points discussed are reflected within the Statement of Common Ground (SoCG) with the EA.
Environment Agency [AS-088]	No	The Applicant does not have any comments to make on this submission as the points discussed are reflected within the SoCG with the EA.
Section 4		
James Wild- Deadline 4 Submission [REP4-056]	Yes	The Applicant wishes to respond to points made in this submission.
George Freeman - Deadline 4 Submission [REP4-055]	Yes	The Applicant wishes to respond to points made in this submission.
Section 5		
Antony Morgan [REP4-061]	Yes	The Applicant wishes to respond to points made in this submission.
Antony Morgan [REP4-057]	Yes	The Applicant wishes to respond to points made in this submission.
Mark Holmes [REP4-058]	No	The submission provides a summary of the oral submission made at the hearings during w/c 8 September 2026. The Applicant does not have any comments to make on this submission.

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

Reference	Comments	Applicant's Response
Borough Council of Kings Lynn and West Norfolk (ISH2 Written Summary) [REP4-041]		
BCKLWN1-1	Item 1 – Interpretation Row 1.2 The BCKLWN acknowledge discussion in relation to the definition of 'Maintain' as set out in the draft DCO – originally raised at Para 8.1.4 of the Local Impact Report and acknowledge the Applicant's position that the full replacement of the scheme has been assessed in the Environmental Statement and as such the amendment requested by the Council is not necessary. The Council maintains its suggestion that the wording is amended for clarity purposes. Recent DCOs including One Earth and Beacon Fen contain the wording requested by the Council. Whilst the Applicant's reasoning is noted, the Council consider this allows a greater degree of control around the impacts of the development. We are content for the ExA to reach a position on this.	In addition to previous submissions made on this matter, the Applicant refers to the **Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO [APP/8.30]** for a full response on this matter. The Applicant accepts that the parties are likely in a position of 'agreeing to disagree' on this matter, and therefore the Secretary of State will decide on this matter when determining the DCO.
BCKLWN1-2	Part 6 – Miscellaneous and General Row 2.1 The Council maintain its position set out in the LIR - that the scope of works allowed by Article 40 as currently worded could result in adverse impacts to the key landscape features which adjoin the order limits, particularly Bartholomew's Hill Plantation. The current wording would allow substantial works to trees bordering the site limits without any additional controls available and this would result in adverse effects for the heritage assets within the Council's area which could be significant. The Council consider that the current draft wording does not sufficiently protect these adjoining landscape features which provide a significant element of screening for the proposed industrial infrastructure.	In addition to previous submissions made on this matter, the Applicant refers to the **Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO [APP/8.30]** for a full response on this matter. The Applicant accepts that the parties are likely in a position of 'agreeing to disagree' on this matter, and therefore the Secretary of State will decide on this matter when determining the DCO. The Applicant notes that its drafting is consistent with the corresponding provisions in the recently-made Green Hill Solar Farm Order 2026.
BCKLWN1-3	Schedule 2 – Requirements Row 3.2 The Council support the DIO's requests in regard to the additional requirements detailed in RR-051 and reiterate the need for consideration of RAF Marham's contribution both to the local economy as an employer and to the Nation's defence. As noted within the Council's LIR any impacts upon the RAF base, for example from impacts upon the precision radar or from glint and glare, would be at odds with the Local Plan and would not be supported by the Council. Any physical mitigation measures could have additional impacts which would need careful consideration given the landscape and heritage consideration in the Council's responses to date.	The Applicant has agreed wording with the Ministry of Defence (MoD) for DCO requirements in relation to all outstanding considerations of the MoD (including PAR Mitigation) relating to RAF Marham, all of which have been included in Schedule 2 of the **draft DCO [APP/3.1.5]** at Deadline 5. This agreement is reflected in the **SoCG with Defence Infrastructure Organisation (DIO) [APP/5.22.1]** submitted at Deadline 5.
BCKLWN1-4	Item 2 – Aviation Row 4.1	The **Design Principles, Parameters and Commitments [APP/5.8.5]** details that the PAR Mitigation would be:

	The Council note that mitigations plans, whilst progressing, are not yet at a stage to allow any detailed consideration of the landscape impacts of the proposal non-technical mitigation. The Applicant intends to rely on commitments within the Design Principles Parameters document, to set out the maximum height of any bunds or fencing to be 4.5m. Additional measures in relation to mitigation proposals are promised at deadline 5 (confirmed during discussion at ISH3). The Applicant states that the proposed mitigation measures will be in line with the existing ceiling height of the proposed development and the extent of effects would not change versus that already considered within the Environmental Statement. The applicant is confident that physical mitigation required to meet the MODs needs would not introduce further or additional residual adverse significant effects. The Council would request that at a minimum a broad understanding of this mitigation detail is provided upfront given the conflicting issues of the impacts upon RAF Marham versus the potential landscape impacts. Similarly, considerations for bird strike will need to align with the need for suitable habitat for bird species identified in the Ecology Chapter. The design principles, parameters and commitments document should be updated to reflect a maximum height of 4.5m for the relevant bunds and/or fencing. The Council will review the proposed detail when it becomes available.	• a maximum height of 4.5m. • located within Work No. 1(a) only. • maximum depth fence foundations no greater than the piled mounting structures. • either a fence and/or a bund. • implemented prior to the construction of any part of Work No. 1(a) within the areas shown as Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 on **RAF Marham Mitigation Areas Plan [APP/8.26.1]**. The **Design Principles, Parameters and Commitments [APP/5.8.5]** details that if a bund is specified: • the slopes of the bund will not exceed 1:3 and will be seeded with grass only; and • material will be sourced from within the Site. The **Design Principles, Parameters and Commitments [APP/5.8.5]** details that if a fence is specified: • Clearances above ground or mammal gates will be included within the deer fence to permit the passage of wildlife; • Will consist of non-reflective materials; • Will not replace the deer fence around the perimeter of Solar PV Arrays consisting of wire mesh and wooden or metal posts; • Will be sited no closer than 4m to the security fencing; and • Externally finished to be in keeping with the prevailing surrounding environment. The exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction but will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. Additional assessment information and narrative regarding potential effects as a result of the PAR Mitigation has been provided, as follows:. • **ES Chapter 6: Landscape and Visual [APP/6.2.2]** has been updated with additional assessment information and narrative regarding potential landscape and visual effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant landscape and visual effects as a result of the proposed PAR Mitigation. • The **Technical Information Note - Landscape and Visual [APP/8.18.1]** has been updated with additional assessment information and narrative regarding potential landscape and visual effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant landscape and visual effects as a result of the proposed PAR Mitigation. • **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4.1]** has been updated with additional assessment information and narrative regarding potential residential visual amenity effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant effects as a result of the proposed PAR Mitigation. • **ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4.1]** has been updated with additional assessment information and narrative regarding potential amenity and recreation effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant effects as a result of the proposed PAR Mitigation.

Borough Council of Kings Lynn and West Norfolk (ISH3 Written Summary) [REP4-042]		
BCKLWN2-1	Item 1 – Landscape and Visual Row 1.2 The Council reiterate concerns, initially raised as part of the Local Impact Report REP1-076 in regard to the need for protection for Bartholomew's Hill Plantation. The land is outside of the Borough Council's control and therefore outside of its remit. The Council strongly suggests that additional protections for Bartholomew's Hill Plantation in particular should be secured given its contribution to the screening of the core infrastructure of the Solar Farm (the BESS compound and Substations) from the setting of highly significant designated heritage assets. Other than the Forestry Commission's licensing processes, no protections are currently in place for Bartholomew's Hill. As it stands therefore, works that do not require a license (lopping, extensive pruning, pollarding etc) could significantly reduce the screening the woodland provides with no mechanism of control in place for the Local Authority. Works to the woodland without proper consideration, would result in significant changes to the key landscape feature which is currently relied upon to screen the heritage assets in Castle Acre and the adjoining area. The Council note that the lifetime of the trees across the woodland means that the trees will require careful management for the landscape screening to remain for the 60-year operational period and beyond given the permanent retention of the National Grid Substation.	Key existing landscape features within the Order limits will be protected during the construction, operation and decommissioning phases of the Scheme through implementation of the **outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11.3]** and the **ES Appendix 16.4: Arboricultural Impact Assessment [REP2-014].** As described in the **oLEMP [APP/7.11.3],** appropriate buffers/ offsets will be implemented. Bartholomew's Hill Plantation is not located within the Order limits and is, therefore, not within the Applicant's control. As with many other areas of woodland in the wider study area, there is no reason to suggest that Bartholomew's Hill Plantation would be removed. The Applicant understands that BCKLWN's position is that they suggest some form of protection should be secured to ensure the long-term protection of the landscape screening and Bartholomew's Hill Plantation. The Applicant reaffirms its assessed position of assuming that the woodland is not to be removed as there is no reason to assume that it would be and is proposing no additional measures to protect the woodland (particularly given that the woodland falls outside of the Order limits and, therefore, is outside of the Applicant's control). Notwithstanding this, the Applicant has been informed by the landowner that the woodland falls within a Continuous Cover Forestry management plan that ensures that the plantation provides continuous tree cover and is cared for in a sustainable way that promotes the longevity of the woodland. The Applicant is advised by the landowner that a TPO is not necessary, given the current successful management of the woodland and the fact that the restrictions imposed by a TPO could in fact harm the health and longevity of the woodland due to the need to seek approval for much smaller works which could slow down efforts to ensure for e.g. diseased trees are removed in good time as part of natural regeneration. The Applicant also refers to the **Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO [APP/8.30]** for a full response on this matter (see response to **BCKLWN1-2** above). The existing and proposed vegetation within the Order limits will also be managed to encourage visual screening, as outlined within the **oLEMP [APP/7.11.3].** Bartholomew's Hill Plantation is not located within the Order limits and is, therefore, not able to be managed via the **oLEMP [APP/7.11.3].**
BCKLWN2-2	Item 1 – Landscape and Visual Row 1.2 It should be noted that the Council have no objection to the principle of ongoing management and maintenance of the plantation as a commercial woodland, it is acknowledged that the proper management of the woodland is the only appropriate mechanism to secure long-term screening of the key infrastructure. However, given the potential for harmful works to or complete loss of trees that could occur as a result of the scope of Forestry controls, we suggest that in the absence of any other legal mechanism on the landowner, some form of protection should be secured to ensure the long-term protection of the landscape screening.	As stated in response to **BCKLWN2-1** above, Bartholomew's Hill Plantation is not located within the Order limits and is, therefore, not within the Applicant's control. As with many other areas of woodland in the wider study area, there is no reason to suggest that Bartholomew's Hill Plantation would be removed. The Applicant understands that BCKLWN's position is that they suggest some form of protection should be secured to ensure the long-term protection of the landscape screening and Bartholomew's Hill Plantation. The Applicant reaffirms its assessed position of assuming that the woodland is not to be removed as there is no reason to assume that it would be and is proposing no additional measures to protect the woodland (particularly given that the woodland falls outside of the Order limits and, therefore, is outside of the Applicant's control). Notwithstanding this, the Applicant has been informed by the landowner that the woodland falls within a Continuous Cover Forestry management plan that ensures that the plantation provides continuous tree cover and is cared for in a sustainable way that promotes the longevity of the woodland. The Applicant is advised by the landowner that a TPO is not necessary, given the current successful management of the woodland and the fact that the restrictions imposed by a TPO could in fact harm the health and longevity of the woodland due to the need to seek approval for much smaller works which could slow down efforts to ensure for e.g. diseased trees are removed in good time as part of natural regeneration.

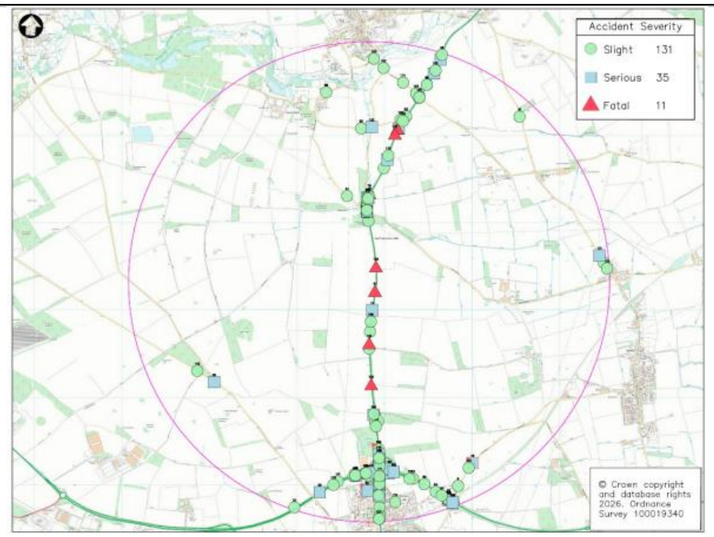
Borough Council of Kings Lynn and West Norfolk (Responses to Deadline 3 Submissions) [REP4-060]		
BCKLWN3-1	REP3-075 The Council welcomes the revisions to 8.2.1, 8.2.2, 8.2.12 and 8.2.13, along with 8.3.1 and 8.3.2, plus 8.5.3, 8.5.4, 8.5.5 and 8.5.6. Although these are mainly related to Highways aspects within the remit of National Highways or Norfolk County Council, construction traffic could have noise impacts on residential amenity, so the monitoring of vehicle movements and recording of such would be beneficial if complaints are received from residents.	The Applicant notes and welcomes the Council's comments. Paragraphs 8.3.1 and 8.3.2 of the **outline Construction Traffic Management Plan (oCTMP) [APP/7.7.4]** provide for the monitoring and recording of construction vehicle movements, including daily vehicle and delivery records and monthly construction traffic monitoring reports. The monthly reports will also record complaints, breaches and corrective actions.
BCKLWN3-2	REP3-088 The Council notes the Applicant's in-depth responses to ExQ2, and in general has no specific additional comment to make. The Council notes in particular the discussion of Bartholomew's Hill Plantation and the additional section plans provided. The Council has maintained throughout examination the need for Bartholomew's Hill Plantation to be adequately protected, and the additional section plans reiterate this need. Whilst comments regarding the likelihood of removal of the plantation are noted, the Council has concerns that the area's exclusion from the Order limits results in a lack of control over a very important screening feature when considering heritage impacts. Section DD within Appendix 1 of this document confirms the landscape benefit that this woodland provides for the BESS and Substation infrastructure. The prominence of Bartholomew's Hill is further evidenced by the wirelines provided on the updated photomontage figures.	The Applicant refers to its responses to **BCKLWN2-1** and **BCKLWN2-2** above for a full response on this matter.
Breckland Council (Standalone Submission Following Issue Specific Hearing 3) [REP4-043]		
BC1	2.0 Views from the A1065 2.1 The Council maintains that the landscape and visual effects experienced from the A1065 have been underplayed. This section of the road provides views across an open rural landscape, and the Council considers that the Proposed Development would result in a notable adverse change to the character and experience of those views. Sporle Parish Council also raised notable concerns regarding Viewpoint Group 4 (elevated land to the east of the A1065) about the extent of the Proposed Development that would be visible, as well as the potential for cumulative views including with High Grove Solar Farm. 2.2 At ISH3, the Applicant maintained visual effects experienced by those travelling along the A1065 would be 'slight-minimal' in the long term and described the existing views as "gappy". It maintained that those views are transitory and fleeting. The Council does not agree with that conclusion. The open views across the landscape are experienced in several places and the traveller experience, whether walking or in a moving vehicle, is one of openness, views, and the "big skies" and landscape that characterises Norfolk. Whilst proposed planting may reduce the visibility of solar infrastructure over time, it would not preserve the existing openness and expansive nature of the landscape. The introduction of screening vegetation would itself contribute to a more enclosed landscape character. Screening the development and retaining the existing sense of openness are not equivalent outcomes.	The Applicant does not agree that the judgments made within **ES Chapter 6: Landscape and Visual [APP/6.2.2]** have been underplayed. An additional assessment has been provided at the request of the Council in the **Technical Information Note - Landscape and Visual [APP/8.18.1]**. In **ES Chapter 6: Landscape and Visual [APP/6.2.2]**, Viewpoints 1, 18 and 20 are from along the A1065, with Viewpoint 20 also forming a new visualisation within the **Technical Information Note - Landscape and Visual [APP/8.18.1]**. Advance planting implemented along the A1065 roadside would provide visual screening along gappy or defunct sections of hedge which would have been previously intact and enclosed. The proposed Solar PV Arrays would be set back & visible within transient and intermittent views for motorists travelling along the A1065. These receptors are considered to be of a low sensitivity. The **Technical Information Note - Landscape and Visual [APP/8.18.1]** outlines in paragraph 1.2.6 that embedded mitigation serves to re-establish the historic character of the Site, reinstating hedges and field boundaries previously lost through agricultural intensification and field amalgamation. The historic maps of 1769, 1789, 1839 (tithe), 1898 and the aerial photography of 1946 within **ES Appendix 8.3: Archaeological Desk-Based Assessment [APP-153]** show that some field amalgamation and woodland planting has taken place to the present day.
BC2	3.0 Aviation Mitigation and Landscape Effects 3.1 At ISH3, potential mitigation of effects on RAF Marham's Precision Approach Radar was described as possibly comprising bunds, fencing or a combination of measures, potentially up to 4.5 metres in height. It was also indicated that this mitigation could affect several fields in the western part of the Order Limits. However, the final form, height, location and extent of the mitigation have not been confirmed, with the DIO unable to confirm if 4.5m would be sufficient.	The Applicant has provided evidence with regard to additional assessment information and narrative regarding potential effects as a result of the PAR Mitigation. It remains the case that the PAR Mitigation would not give rise to new significant effects but may give rise to increased significant effects. This assessment is full and informed. The detail of the effects resulting from the PAR Mitigation has been provided, as follows: • **ES Chapter 6: Landscape and Visual [APP/6.2.2]** has been updated with additional assessment information and narrative regarding potential landscape and visual effects as

	The plan referred to during the hearing has not yet been made available to the Council for detailed consideration. 3.2 The Applicant stated that should 4.5m be insufficient, the relevant solar panels would not be installed. As such, the Applicant's position was that given any mitigation would be no higher than 4.5m, it would be within the Development Consent Order parameters in the event consent is granted. The applicant also noted that while bunds would be incongruous, they would not give rise to 'new' significant effects but may give rise to 'increased' significant effects. Breckland is not aware of any evidence that supports this conclusion. 3.3 The Council is concerned that this information has emerged at a very late stage in the Examination and remains insufficiently developed to enable a full and informed assessment. Depending upon its final form, the mitigation could give rise to additional or increased effects on landscape character, visual amenity, agricultural land, drainage and ground levels. It is paramount that any such effects are included within the Environmental Assessment and assessed by the Examining Authority prior to determination. 3.4 By way of illustration, a 4.5 metre high bund with side slopes of approximately 1:3 would have a substantial footprint of up to 30m and could require significant cut and fill works or imported material. The Norfolk County Council Lead Local Flood Authority Officer also noted that associated changes to drainage would require attenuation features; these could give rise to further adverse landscape and visual effects. The Council is therefore unable to conclude that the mitigation would be acceptable without clearer information on dimensions, alignment, construction, materials, drainage implications, landscape treatment and removal or reinstatement arrangements. 3.5 The Applicant confirmed that at the end of the project life, any necessary mitigation measures would be removed and the ground reinstated. The Council would like to understand what mechanisms are in place to ensure the land is reinstated at the end of the project life as the potential bunds are not referenced within the submitted outline Decommissioning Strategy (APP/7.10.2 (Revision 2)). 3.6 The Council is not questioning the need to safeguard RAF Marham or suggesting that an acceptable solution is incapable of being developed. Its concern is that the environmental acceptability of an undefined solution should not be assumed solely because its maximum height might fall within a general parameter applying to other elements of the Scheme.	a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant landscape and visual effects as a result of the proposed PAR Mitigation. • The **Technical Information Note - Landscape and Visual [APP/8.18.1]** has been updated with additional assessment information and narrative regarding potential landscape and visual effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant landscape and visual effects as a result of the proposed PAR Mitigation. • **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4.1]** has been updated with additional assessment information and narrative regarding potential residential visual amenity effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant effects as a result of the proposed PAR Mitigation. • **ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4.1]** has been updated with additional assessment information and narrative regarding potential amenity and recreation effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant effects as a result of the proposed PAR Mitigation. The Applicant submitted an updated **Design Principles, Parameters and Commitments [APP/5.8.5]** at Deadline 4 which sets out clear parameters for the PAR Mitigation bunds and / or fencing, including a maximum height of 4.5m. With regards to land reinstatement at the point of decommissioning, Section 6.1 of the **outline Soil Management Plan (oSMP) [REP1-062]** requires the Applicant to have in place a detailed SMP at the time of decommissioning, to ensure the Site is returned to its original use and condition as far as practicable, which will include consideration of its original topography. The **outline Decommissioning Strategy (oDS) [REP3-067]**, at paragraph 2.1.6**,** also notes that soil profiling may be required, and the land will be contoured in agreement with the landowner and in accordance with this oDS, approximately similar to the current topography. Should the Applicant decide to construct PAR Mitigation bunds, the detailed SMP and Decommissioning Strategy would incorporate the appropriate measures that reflect the final detailed design. The Applicant is therefore of the view that sufficient measures are in place to ensure the land is reinstated at the end of the project life.
BC3	4.0 Need for Sufficiently Prescriptive Controls 4.1 The Council's recent experience of discharging requirements for nationally significant energy infrastructure (Norfolk Vanguard Offshore Wind Farm Order 2022 and the Norfolk Boreas Offshore Wind Farm Order 2021) demonstrates the importance of ensuring that the Development Consent Order, certified documents and design parameters are sufficiently precise and well informed at the consent stage. Certainty at this stage assists the relevant planning authority in determining whether subsequent detailed proposals fall within the assessed envelope and can be confidently and lawfully approved with minimal delay. 4.2 Accordingly, if the precise radar mitigation solution cannot be confirmed during the Examination, the Council considers that the Development Consent Order should establish a clear, sufficiently prescriptive and enforceable approval mechanism. This should secure, as a minimum: • Consultation with the relevant planning authority, LLFA and the Defence Infrastructure Organisation; • Defined limits on the location, height, length, footprint and form of physical mitigation; • Assessment of landscape, visual, drainage, agricultural, ecological and highways implications;	The Applicant has agreed wording with the Ministry of Defence (MoD) for DCO requirements in relation to all outstanding considerations of the MoD (including PAR Mitigation) relating to RAF Marham, all of which have been included in Schedule 2 of the **draft DCO [APP/3.1.5]** at Deadline 5. The Applicant therefore considers that, as these matters are dealt with via DCO requirements, the procedure and mechanism is precise, prescriptive, well-informed, clear and enforceable. In relation to consideration of environmental impacts, the Applicant refers to its response to **BC2** above and also to the **PAR Mitigation Environmental Technical Note [APP/8.32]** submitted at Deadline 5.

	• Details of earthworks and the source, handling and disposal of material; • Landscape integration, establishment, management and maintenance measures; • Confirmation that the mitigation remains within the environmental envelope assessed; and Public • Removal of the mitigation and satisfactory reinstatement of the land when it is no longer required. 4.3 The Council considers that the mechanism must be as prescriptive as possible and should not leave the scale and environmental acceptability of potentially substantial physical works to be determined only after development consent has been granted.	
Norfolk County Council (Deadline 4 Submission) [REP4-044]		
NCC1	4.1 NCC as the LLFA acknowledges that the applicant has provided Environmental Statement Figure 12.1 Ephemeral Ditches [APP-115] that provides an initial indication of some ephemeral watercourses but not all the watercourses. The LLFA notes that ephemeral watercourses are not wet all year round, but this does not mean the watercourses are not connected to the wider network. Normally a topographic survey is provided for a development site (including those taking an NSIP planning route). The topographic survey identifies watercourse channels, structures within a watercourse and the topographic geometry of the site prior to development. This has not been undertaken or provided by the applicant. Watercourses have only been shown based on the OS background mapping with breaks in the marked channel. No watercourse tracing investigation has been undertaken to demonstrate whether or not there is a connection, such as 'lost' culverts between these segments of watercourse that are all along the mapped surface water flow route. There has not been any investigation as to where these ephemeral watercourses discharge to. These watercourses are in the vicinity of existing ponds, and it is not clear if these watercourses are hydraulically connected to the ponds. The applicant has not provided evidence of ongoing watercourse flow monitoring.	The Applicant maintains that the ephemeral agricultural ditches within the Order limits are 'blind' or 'dead end' i.e. not connected to the wider hydrological network. The original site walkover visual observations have been confirmed through penetrative spike testing undertaken on 8 September 2026, which indicate no 'lost' culverts buried under the ends of the ditches. **ES Chapter 12: Water Resources [APP/6.2.4]** has been updated at Deadline 5 to include this information; however, the assessment and conclusions remain unchanged. Analysis of the terrain and visual observations from several site walkovers confirm that the ephemeral ditches cannot physically drain to the on-site ponds as the ponds are upgradient of the ditches and drain to a topographical low point, as outlined in the Pluvial Flooding section of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]**.
NCC2	4.2 In relation to the hydraulic modelling the applicant has undertaken on the eastern side of the site, the applicant's own surface water modelling exercise identifies an overlap with the identified watercourses (Environmental Statement Figure 12.1 Ephemeral Ditches [APP-115] and ES Appendix 12.2 Flood Risk Assessment [REP3-065]. It is noted that the area modelled by the Environment Agency fluvial model for the River Nar Tributary [Check the long term flood risk for an area in England - GOV.UK] that runs alongside the road between Bailey Street to Castle Acre Road (A1065) (thought to be called Lexham Lane) runs up to the western side of the A1065 before changing to a surface water model. The applicant has prepared a surface water model, that does not include an channel topographic or culvert structure information, that covers both the fluvial and surface water model. There is likely to be a culvert under the road to enable the flow of the ordinary watercourse that is a tributary to the River Nar. The baseline model has not improved the applicant's understanding of the site specific flood risk and has not improved the quality of the hydraulic modelling available.	The surface (pluvial) water model was intended to verify the Environment Agency surface water flood map, which identified that a confined pluvial flow pathway existed in the very western boundary of Work Nos. 2 – 4. The 2D model which informed the assessment of flood risk for the Scheme shows a good correlation with the EA dataset. As outlined in Annex F: Pluvial Flood Modelling Report of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** the LiDAR dataset utilised within the 2D model is of 1m resolution and as such, the channels of the local ditches and watercourse are captured in the model. Given the observed small diameter (measuring 0.5 m diameter as reported in the **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]**, as updated for Deadline 5) of the culvert carrying the A1065, the conveyance capacity is limited and has an immaterial effect on flood extents and depths, as reported in the updated FRA. As such, the conclusions of the original assessment are unaffected, and the Scheme is at negligible risk of surface water flooding.

NCC3	4.4 The LLFA notes that the applicant has indicated ordinary watercourse consents are considered a duplication of consenting. This is not the case. Other NSIP schemes both in Norfolk, such as the Sheringham and Dudgeon Extension Projects [EN010109], A47 North Tuddenham to Easton [TR010038], Norfolk Vanguard [EN010079], Norfolk Boreas [EN010087] and Norwich to Tilbury [EN020027], are all examples where the Land Drainage Act has been preserved in the DCO protective provisions. The Land Drainage Act is an important tool in the management of flow in ordinary watercourses. At present, there are no protective provisions within the current draft DCO to reinstate relevant Land Drainage Consenting activities. Therefore, the LLFA does not consider it appropriate to disapply section 23 of the Land Drainage Act 1991. As the applicant has demonstrated that there is at least one ordinary watercourse on site, the LLFA considers the applicant's proposed disapplication of the Land Drainage Act 1991 appears to be a premature and inappropriate approach as the Land Drainage Act 1991 remains relevant. The applicant has not undertaken sufficient investigation and design development at this time to adequately define the works proposed and their location. Ordinary Watercourse Consents would only apply to a small area of the site where works would need to occur within the channel. It should be noted that if there is no need for works in a watercourse, then there would be no requirement for an application under the Land Drainage Act. NCC encourages applicants to discuss their potential in-channel works with the LLFA officers to determine whether a consent is required. Therefore, at this time, there is not enough evidence for the disapplication of the Land Drainage Act as it is shown to be a relevant consideration to the proposed development. 4.5 The LLFA reminds the applicant that to disapply the legislative regime, those with relevant consenting activities under that legislation need to give consent to for its disapplication. As there are ordinary watercourses on site, the applicant has not undertaken or provided a suitable evidence base and has not proposed any relevant protective provisions, the LLFA would not consent under Section 150 of the Planning Act 2008 to the removal of consent requirements of Section 23 of the Land Drainage Act 1991.	In addition to previous submissions made on this matter, the Applicant refers to the **Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO [APP/8.30]** for a full response on this matter. The Applicant accepts that the parties are likely in a position of 'agreeing to disagree' on this matter, and therefore the Secretary of State will decide on this matter when determining the DCO. The Applicant notes that its drafting is consistent with the corresponding provisions in the recently-made Green Hill Solar Farm Order 2026.
NCC4	4.6 The LLFA has reviewed Article 49 and the Environment Agency's comments on Article 49 [REP3-095]. The LLFA has also reviewed previous NSIPs in Norfolk, both recent and older, and is unable to find a similar Article in the made or draft DCOs. The LLFA agrees with the Environment Agency's comments that they do not have responsibility for the land drainage consenting on ordinary watercourses. The LLFA also agrees with the Environment Agency's summary of their responsibilities in relation to Main Rivers and pollution management. However, the LLFA notes the Environment Agency continues to reference the Internal Drainage Board (IDB). The LLFA notes that Norfolk Rivers IDB has an area of responsibility for the River Nar and its tributaries that extends to the northern side of Plantation Road (the road that runs west to east between Rougham Road and A1065). The ordinary watercourse to the south of Plantation Road would be in the jurisdiction of the LLFA. 4.7 NCC does not see the need for Article 49. The occupier/owner of land within the proposed site boundary would normally be responsible for the maintenance and management of the land and its drainage. NCC LLFA, the Environment Agency and the IDB's within the Norfolk area are all clear that anyone living on, owning or leasing land next to a watercourse has rights and responsibility for its maintenance. It is the presumption in common law, in the absence of any evidence to the contrary. This is made clear in the NCC LLFA online guidance Living next to a watercourse - Watercourse maintenance in Norfolk - Norfolk County Council, which is supported by the Environment Agency and the IDB. 4.8 The LLFA agrees with the Environment Agency's perspective that Article 49 should be removed from the draft DCO.	In addition to previous submissions made on this matter, the Applicant refers to the **Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO [APP/8.30]** for a full response on this matter. The Applicant accepts that the parties are likely in a position of 'agreeing to disagree' on this matter, and therefore the Secretary of State will decide on this matter when determining the DCO.

NCC5	4.9 NCC has previously commented that the removal of piles (and cables) will have a destructive effect on below-ground archaeological remains which will need to be mitigated at preconstruction stage. 4.10 The same principle applies to the creation and removal reinstatement of creation of platforms and aviation radar mitigation bunds. It does not really matter if the material to crate the platforms or bunds is imported or derived from within the site. Crushing and compaction can impact negatively on below-ground archaeological remains. It is usual engineering practice to remove topsoil from any area where substantial and stable earthworks are to be created. 4.11 The addition of aviation radar mitigation bunds to the scheme greatly increases the potential levels of impact of the scheme as a whole on below-ground archaeological remains rendering the previous stance on the applicant archaeological consultants' null and void. This very, very much greater level of potential impacts on below-ground archaeological remains can be dealt with within the framework of the existing draft requirement wording and draft archaeological mitigation strategy.	It is accepted that the removal of piles and cables in the decommissioning phase could have a destructive effect upon below ground archaeological remains; however, the mitigation strategy **ES Appendix 8.7: outline Archaeological Mitigation Strategy [REP2-016]**, which was produced in consultation with Norfolk Historic Environment Service (NHES), allows for these impacts to be mitigated at preconstruction stage, as stated in paragraph 8.8.71 of **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]**. The mitigation proposed for the PAR will be determined at detailed design stage and may take the form of bunds and/or fencing. Bunds would present the greatest potential impact to below-ground archaeology, should topsoil require stripping. The bunds would be relatively localised (a maximum bund height of 4.5m and a 3:1 slope to the bunds would equate to a c. 27m wide footprint) and this is unlikely to result in significant compaction of archaeological deposits. Whilst the creation of bunds will represent a greater impact, it cannot be described as 'very, very much greater'. It is understood that NHES had been given the impression that the Marnham Mitigation Verticies shown in the **RAF Marnham Mitigation Areas Plan [APP/8.26.1]** were the extent of proposed bunds, rather than the area which requires mitigation through the creation of bunds and/or fencing. Areas of bund creation would fall within the category of other elements of the Scheme that would have localised impacts upon buried archaeology as detailed in paragraph 8.8.16 of **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** and, therefore, the conclusions of the chapter remain valid and robust. Any potential impacts of bunds can be mitigated within the framework of **ES Appendix 8.7: outline Archaeological Mitigation Strategy [REP2-016].**
NCC6	Item 5 4.13. NCC as the LHA has reviewed the traffic accident date for the a1065 between Swaffham and Castle Acre for the last 30 years. The data indicates a total of 177 recorded collisions over the period, comprising: • 131 slight collisions • 35 serious collisions • 11 fatal collisions The type and distribution of the collision is shown on the Figure 1 below Figure 1: The Droves – 30 year persona injury accidents (30 June 1996 – 1 July 2026) – Collision Map	The Applicant notes the additional historic collision data provided by NCC for the A1065 between Swaffham and Castle Acre.**ES Appendix 9.2: Traffic Assessment [APP-163]** reviewed personal injury collision data on the agreed access routes to the Site for the latest three-year period (2022–2024), using the Department for Transport STATS19 database. The use of a recent three-year period is consistent with established highway-safety assessment practice and provides an appropriate basis for identifying current collision patterns and clusters. Six personal injury collisions were identified across the study network during the three-year period, with no geographical collision clusters identified. The assessment therefore concluded that there were no existing highway-safety concerns that would result in an increased propensity for collisions. The Applicant acknowledges that the 30-year dataset provided by NCC gives additional historic context. However, it covers a substantially longer historic period and the total number of collisions recorded over that period does not, in itself, demonstrate a current collision pattern or cluster relevant to the Scheme's construction traffic route. The additional historic data therefore does not alter the conclusions of the submitted road-safety assessment and conclusion that there are no existing highway safety concerns that would be exacerbated by the Scheme.

		
Sporle with Palgrave Parish Council (Representation at Deadline 4 – Following ASI) [REP4-052]		
SPPC1	2. Locations 3,4,5,6,9,10 are all in Visual Receptor Group 4 (VRG4) as shown on the plan shown in APP-084. This group is outside the Order Limits. The location points include the viewpoints described in REP1-097 as: N3 – Location 4 View 7 – Location 6 VP46 – Location 9 L2, L3, VP4, L5, L6 – walking along Sporle with Palgrave BR5 PRoW to Location 10 3. In the ASI, I was requested to speak to what we were seeing and attempted to show the extent of cumulative impacts of the scheme with the proposed High Grove scheme as also described initially in our response to the Statutory Consultation and further in RR054, PDA-004, REP1-098, and REP2-038. 4. At Location 6 there is no visible potential impact from High Groves however it is impacted by views of the Droves (fields 14 and 15 up to the horizon along Petticoat Drove). Although this is a minor road (from Sporle to Newton by Castle Acre) it is used by many people walking out from Sporle village. 5. As mentioned in point 2 above all these view points are outside the Order Limits. The Applicant states in response to CAPC20. 'There are no potential long term significant adverse landscape effects beyond the Order limits.' (REP2-039). 6. We contend that the ASI and the views from these locations back up the Breckland District Council's position as stated in their representations in ISH3 agenda item 3.1. • Breckland Landscape Classifications are 20 years old and are largely out of date, are broad brush and, for example, do not include the large number of energy structures already in place such as the Necton substations, North Pickenham wind farm and the wind turbines on the north side of Swaffham. • E6 North Pickenham Plateau within which the site is situated is a very large area and the site is at the west end and has little interaction with the other parts.	2. The Applicant notes this comment. 3. The Applicant notes this comment. 4. After further clarity was sought from Sporle with Palgrave Council on their representations, the location 6 noted by the Parish Council relates to location number 6 on the Accompanied Site Inspection (ASI) route map. Location 6, as referred to in the representation, is approximately 2km east of the Order limits along Newton Road. This location is within wider Visual Receptor Group (VRG) 4 and sited outside of the Zone of Visual Influence (ZVI), as shown on **ES Figure 6.7: Visual Receptor Groups [REP3-056]**. The Applicant details in para 6.6.25 of the **ES Chapter 6: Landscape and Visual [APP/6.2.2]** that if a location within the study area is situated outside of the ZVI "*this does not mean that there would be no potential visibility outside the ZVI indicated, but rather that any visibility beyond the ZVI would be minimal".* As was presented by the Applicant on the ASI at this location, the visual impact at this location would be minimal and not be significant given that: • only a small area of the Scheme may be perceptible approximately 2km to the west; • where visible, the Scheme would form a small part of a wider view which also includes views of existing pylons in close proximity to this location, tempering potential effects; • the existing landscape features within the Order limits and wider landscape would provide a filtering effect and softening of the Scheme in the short and medium terms; and • established advance planting and extensive planting proposals detailed within the **oLEMP [APP/7.11.3],** coupled with existing vegetation, would serve to provide sufficient filtering and softening of the Scheme, into the wider landscape, in the long term once matured. 5. The Applicant notes this comment with regard to cumulative effects. Potential significant cumulative effects in relation to the High Grove Solar DCO to the south-east of the Site have been identified within Section 6.11 of **ES Chapter 6: Landscape and Visual [APP/6.2.2]**. The assessment concludes: (a) Significant adverse landscape effects during the construction and operation (short and long term) stages on the E6 North Pickenham Plateau LCA; and (b) Significant adverse visual effects during the construction stage for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave.

	• That there should have been work done in classifying the site and its surrounds into LLCA's which would have then straddled the borders and provided a more realistic LVIA. Mr Richards alluded to a 'ripple effect' – adverse ripples into surrounding countryside.	6. (a) For the purposes of the assessments within **ES Chapter 6: Landscape and Visual [APP/6.2.2]**, the Applicant does not consider there to be serious limitations within the Breckland Landscape Character Assessment (2007). Further detail is provided in the LVIA on site observations relating to landscape character to inform the assessors understanding any deviations in the key characteristics associated with the relevant landscape character area / type and the extent to which the key characteristics identified within the Breckland Landscape Character Assessment (2007) are represented within the Order limits. The Breckland Landscape Character Assessment (2007) is at a suitable scale and level of detail for the LVIA and, as per paragraph 5.15, supplemented with site observations from fieldwork to *"draw out more clearly the key characteristics that are more relevant to the proposal."* With regards to paragraph 5.16 of GLVIA3, the Council's comment is noted, however as described above and in **Technical Information Note - Landscape and Visual [APP/8.18.1]** further information was provided on landscape characteristics based on site observations and desk top review. This information was supplemented by a further site specific landscape character analysis in the **Design Approach Document [AS-009 - AS-011]** which refers to *"views of overhead power lines and pylons"* and "*wind turbines adjacent to Swaffham"*. The Applicant therefore disagrees that they have been "*somewhat selective*" in quoting GLVIA3. 6. (b) The Applicant notes this comment. Relevant landscape character areas, such as E6, are shown on **ES Figure 6.4: Landscape Character [APP-081].** 6. (c) The Applicant is confident that the assessment and work provided within **ES Chapter 6: Landscape and Visual [APP/6.2.2]** is robust and proportionate. The Applicant's response to 6(a) above also applies to this section. The Applicant also notes that, for the ES, the assessors outlined that the district landscape character assessments were still relevant, again noting that GLVIA paragraph 5.13 states that "*justification should be provided for any departure from the findings of an existing established LCA.*" GLVIA paragraph 5.15 continues by adding that *"existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA - for example by drawing out more clearly the key characteristics that are most relevant to the proposal. Completely new supplementary Landscape Character Assessment work covering the whole Study Area would only be required when there are no existing assessments or when they are available but either have serious limitations that restrict their value or do not provide information at an appropriate level of detail".*
SPPC2	7. The impacts on VRG4 and the view points seen on the ASI could have been addressed better with LLCA's as seen for example with Location 9 which the PC has attempted to show from their Statutory Consultation Response through RR-054, REP1-097, REP1098, REP2-038, REP2-039 to our representations at ISH3 agenda item 3.1. This would have dealt with the cumulative impacts better with High Grove. They are presently at PEIR stage, but in the future, when and if they, submit a DCO application this would have more likely met our current concerns. 8. This would have also had an impact on the assessment which currently only states the significant adverse effects being in the construction phase. We would continue to contend that these impacts will also be significant and adverse in the operational phase, particularly in the first few years until any mitigation hedging and trees reach significant height. We recognise the Applicant in REP3-083 has shown impressions of how this mitigation might look at various viewpoints after 15 years. But this only shows how this whole scheme will change the landscape character for ever as it is unlikely the mitigation will be removed at decommissioning. 9. As stated in a number of the PC's representations this is an area of open sloping landscape with long views. This was also referred to by Breckland District Council in ISH3 agenda item 3.1 with particular reference to the impact of mitigation hedging along the A1065 and its impact in changing the landscape character. The Applicant's response that this should be seen in the sequential nature of traffic passing through a series of views of gaps and hedges and trees	7. The Applicant notes this comment with regard to cumulative effects. Potential significant cumulative effects in relation to the High Grove Solar DCO to the south-east of the Site have been identified within Section 6.11 of **ES Chapter 6: Landscape and Visual [APP/6.2.2]**. With regard to VRG 4, the assessment concludes significant adverse visual effects during the construction stage for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave. 8. **ES Chapter 6: Landscape and Visual [APP/6.2.2]** concludes significant adverse landscape effects during the construction and operation (short and long term) stages on the E6 North Pickenham Plateau LCA. There are judged to be no significant visual impacts during construction, when taking account of the existing landscape features within the Order limits, established advance planting and extensive planting proposals detailed within the **oLEMP [APP/7.11.3].** All of these elements serve to provide sufficient filtering of views from the wider landscape, as to prevent operational significant cumulative effects as a result of High Grove Solar Farm. The **Technical Information Note - Landscape and Visual [APP/8.18.1]** outlines in paragraph 1.2.6 that embedded mitigation serves to re-establish the historic character of the Site, reinstating hedges and field boundaries previously lost through agricultural intensification and field amalgamation. The historic maps of 1769, 1789, 1839 (tithe), 1898 and the aerial photography of 1946 within **ES Appendix 8.3: Archaeological Desk Based Assessment [APP-153]** show that some field amalgamation and woodland planting has taken place to the present day. 9. The Applicant notes this comment. Sequential views are considered for visual receptors, as detailed in full within **ES Chapter 6: Landscape and Visual [APP/6.2.2].**

	as at present lessens the impact. They also used the same answer in relation to walkers using PRoW. 10. The PC would contend that in relation to the impact along the A1065, which was not viewed at the ASI, they would agree with the position taken by Breckland District Council and Castle Acre Parish Council.	10. The Applicant notes this comment. Impacts along the A1065 are outlined within **ES Chapter 6: Landscape and Visual [APP/6.2.2]** and **Technical Information Note - Landscape and Visual [APP/8.18.1]**.
SPPC3	11. However, in relation to the Peddars Way and Location 9, the Applicant made the point that what we were viewing was only part of the sequential effect and further down the path there were hedges and trees obscuring the view. This maybe correct but walkers do stop to take in the view at gaps and this argument cannot be made on PRoW. 12. As mentioned in item 4 above, Location 6 is only a representative view from Newton Road along which there are several points where the Droves can be viewed, which is why several points were requested in PDA-004. Again the same argument was made by the Applicant but this is a largely open road so does not apply. 13. Walking along BR5 to Location 10 we looked in several gaps in the hedge or field gateways. These were largely to show the impact of the three most northerly fields of the Central Area of the High Grove development as shown in their plans at PEIR stage. These showed the considerable impact of views from Castle Acre and particularly the castle ramparts. 14. If the High Grove development obtains its DCO in its current form these gaps in the high hedges, which are both sides of BR5, will likely be gapped so presenting a continuous hedge all the way along to the A1065. Both gapping and/or 3m high solar arrays will destroy the amenity value of the PRoW as the current open landscape views will no longer be available.	11. The Applicant notes this comment. Assessment of effects upon the Peddars Way has taken consideration for sequential views and the variation in potential visibility along the route, throughout the study area, as detailed in full within **ES Chapter 6: Landscape and Visual [APP/6.2.2].** There are no potential significant visual effects upon users of the Peddars Way. 12. After further clarity was sought from Sporle with Palgrave Council on their representations, the location 6 noted by the Parish Council relates to location number 6 on the Accompanied Site Inspection (ASI) route map. Location 6, as referred to in the representation, is approximately 2km east of the Order limits along Newton Road. This location is within wider Visual Receptor Group (VRG) 4 and sited outside of the Zone of Visual Influence (ZVI), as shown on **ES Figure 6.7: Visual Receptor Groups [REP3-056]**. The Applicant details in para 6.6.25 of the **ES Chapter 6: Landscape and Visual [APP/6.2.2]** that if a location within the study area is situated outside of the ZVI "*this does not mean that there would be no potential visibility outside the ZVI indicated, but rather that any visibility beyond the ZVI would be minimal".* As was presented by the Applicant on the ASI at this location, the visual impact at this location would be minimal and not be significant given that: • only a small area of the Scheme may be perceptible approximately 2km to the west; • where visible, the Scheme would form a small part of a wider view which also includes views of existing pylons in close proximity to this location, tempering potential effects; • the existing landscape features within the Order limits and wider landscape would provide a filtering effect and softening of the Scheme in the short and medium terms; and • established advance planting and extensive planting proposals detailed within the **oLEMP [APP/7.11.3],** coupled with existing vegetation, would serve to provide sufficient filtering and softening of the Scheme, into the wider landscape, in the long term once matured. 13. The Applicant notes this comment. PRoW BR5 is not within Castle Acre or upon the castle ramparts. Assessment of visual effects upon receptors within Castle Acre is detailed in full within **ES Chapter 6: Landscape and Visual [APP/6.2.2]** and **ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4.1].** There are no potential significant long term visual effects upon visual receptors within Castle Acre. 14. The Applicant notes this comment which relates to High Grove Solar, not the Scheme. High Grove Solar will be required to undertake its own cumulative assessment, which will consider impacts of the Scheme, when submitting its DCO application.
SPPC4	15. Although not related to the ASI and the above statements the PC is equally concerned with the proposed mitigation required by the MOD. We are assured that the Applicant's insistence that the mitigation suggested cannot be higher than 4.5m which is obviously the maximum height allowed for the solar arrays and controlled by the DCO. However, until the detail of what mitigation is proposed, whether earth bunds or fencing or both, we cannot make a judgement, along with Breckland District Council, Norfolk County Council and Castle Acre Parish Council, on the landscape and visual impacts, despite the Applicant's assurances that it will not change their assessment. This is coupled with the fact that we will not see any plans till Deadline 5 and then only outline ones. We contend that the ExA as well as ourselves and those bodies mentioned above, will not have time to fully respond nor question in any depth	15. The **Design Principles, Parameters and Commitments [APP/5.8.5]** details that the PAR Mitigation would be: • a maximum height of 4.5m. • located within Work No. 1(a) only. • maximum depth fence foundations no greater than the piled mounting structures. • either a fence and/or a bund. • implemented prior to the construction of any part of Work No. 1(a) within the areas shown as Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 on **RAF Marham Mitigation Areas Plan [APP/8.26.1]**.

	the impact of such mitigation proposed before the end of the Examination, thereby significantly weakening its rigour and integrity. 16. The Applicant made the point in their final comments in ISH3 agenda item 3.1 Landscape and Visual that the planning balance for landscape and visual in its entirety is moderately negative. All the points made above will surely increase this negativity and as we hope help to turn the balance in favour of the DCO application being rejected.	The **Design Principles, Parameters and Commitments [APP/5.8.5]** details that if a bund is specified: • the slopes of the bund will not exceed 1:3 and will be seeded with grass only; and • material will be sourced from within the Site. The **Design Principles, Parameters and Commitments [APP/5.8.5]** details that if a fence is specified: • Clearances above ground or mammal gates will be included within the deer fence to permit the passage of wildlife; • Will consist of non-reflective materials; • Will not replace the deer fence around the perimeter of Solar PV Arrays consisting of wire mesh and wooden or metal posts; • Will be sited no closer than 4m to the security fencing; and • Externally finished to be in keeping with the prevailing surrounding environment. The exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction but will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. Additional assessment information and narrative regarding potential effects as a result of the PAR Mitigation has been provided, as follows:. • **ES Chapter 6: Landscape and Visual [APP/6.2.2]** has been updated with additional assessment information and narrative regarding potential landscape and visual effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant landscape and visual effects as a result of the proposed PAR Mitigation. • The **Technical Information Note - Landscape and Visual [APP/8.18.1]** has been updated with additional assessment information and narrative regarding potential landscape and visual effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant landscape and visual effects as a result of the proposed PAR Mitigation. • **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4.1]** has been updated with additional assessment information and narrative regarding potential residential visual amenity effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant effects as a result of the proposed PAR Mitigation. • **ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4.1]** has been updated with additional assessment information and narrative regarding potential amenity and recreation effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant effects as a result of the proposed PAR Mitigation. 16. The Applicant notes that the updated **ES Chapter 6: Landscape and Visual [APP/6.2.2]** does not create any new significant landscape and visual effects as a result of the proposed PAR Mitigation. Therefore, this does not affect or change the weighting given in the planning balance in section 9.4 of the **Planning Statement [AS-076]** as this already accounts for the significant residual landscape and visual impacts set out in **ES Chapter 6: Landscape and Visual [APP/6.2.2]**.
Castle Acre Parish Council (further submission) [REP4-062]		

CAPC1	If a National Grid substation were to be built in the current planned location and a National Grid line diversion built to make a connection, it has been suggested that a number of the existing pylons will be no longer required, so will become redundant. If this application for a DCO were to receive approval, may we ask what can be done about this potential redundant infrastructure. Whose responsibility would they become, would they still belong to the National Grid, could they not be pressured to remove redundant infrastructure from the landscape, if redundant and left in place along with newly constructed pylons this will be increasing the impact on the historic landscape, it could be regarded as industrial litter! We would respectfully ask for some clarity on this point please and would hope all efforts were made to remove any unwanted structures from the landscape if they were indeed no longer required as energy infrastructure.	In the scenario where the final design of the Scheme results in any existing pylons being made redundant, these would remain the responsibility of National Grid Electricity Transmission (NGET) (including in relation to their removal). If the DCO were to be granted, the Applicant would continue to work with NGET in respect of this matter.

3. The Applicant's responses to Prescribed Bodies

Reference	Comments	Applicant's Response
	National Highways [REP4-063]	
NH1-1	**Page 4, NH4** Although the access points to the relevant Work Numbers may not be directly on the SRN, the vehicular and pedestrian access arrangements, parking provision, and circulation areas for the authorised development will generate traffic movements that interact with the SRN, particularly at junctions in the vicinity of the A47/A1065. Inadequate or poorly designed access, parking, or circulation arrangements could result in movements that compromise the safety and free flow of traffic on the strategic network. Without National Highways' approval of the details under Requirement 5, there is a risk that the relevant planning authority could approve details that are inconsistent with approvals granted under other provisions of the DCO — such as Article 14 (means of access), Article 15 (adoption of works), or the detailed Construction Traffic Management Plan secured under Requirement 15. National Highways' involvement at the Requirement 5 stage would ensure coherence across the DCO's approval framework. The Applicant contends that consultation with the highway authority is already secured through various articles and requirements in the draft DCO, and that the relevant planning authority may consult with any organisation it deems necessary under Requirement 5. However, a discretionary power to consult is not equivalent to a requirement for approval. There is no guarantee that the relevant planning authority will consult National Highways on the specific details that affect highway safety and operation. Finally, it should be noted that the amendment sought is narrowly drawn.	The Applicant notes that the approval mechanism (i.e. of the relevant planning authority) under Requirement 5 of the **draft DCO [APP/3.1.5]** includes details in relation to access and parking, as part of the layout of the relevant Work Nos. (1, 2 and 3A). National Highways are not the highway authority for these works and, therefore, including a provision for National Highways to approve these details in Requirement 5 would mandate the mechanism for how the local highway authority must approve the access works where they join the highway, thus removing the existing flexibility that ensures this can be approved by agreement under Article 14 of the **draft DCO [APP/3.1.5]** (and as part of the detailed Construction Traffic Management Plan, secured via Requirement 15 of the **draft DCO [APP/3.1.5]**). Further, this would impose DMRB standards upon these works irrespective of whether that is appropriate, required or even sought by the local highway authority. To do so would be disproportionate with the principle of what is being secured via Requirement 5 (which primarily ensures accordance with the **Design Principles, Parameters and Commitments [APP/5.8.5]**) and is entirely inconsistent with the precedent for Requirement 5 in numerous solar DCOs made to date. The Applicant, therefore, does not agree with the amendments proposed to Requirement 5 of the **draft DCO [APP/3.1.5]** proposed by National Highways. The Applicant accepts, as has been the case on other recent solar DCOs promoted by the Applicant's parent company (Island Green Power) where this matter has been raised by NH, that the parties are likely to 'agree to disagree' on this point at the end of Examination. The Applicant also notes that its drafting in relation to Requirement 5 of the **draft DCO [APP/3.1.5]** (i.e. not specifying consultation with National Highways) is consistent with the corresponding drafting in the recently-made Green Hill Solar Farm Order 2026.
	National Highways [REP4-054]	
NH2-1	**Pages 3 to 5, Item 3c (and Pages 2 and 3 (NH2) in National Highways [REP4-063])** The Applicant seeks **temporary possession** powers over eight National Highways plots which form part of the Strategic Road Network (SRN) near the A47 junction with the A1065. National Highways' position is that these powers are neither necessary nor proportionate, and the NH plots should be removed from the Book of Reference. The Applicant has confirmed that powers sought are limited to temporary rights to facilitate AIL movements during construction. – specifically, the removal of street furniture, verge reinforcement, or temporary widening. While the highway would be reinstated after delivery, the precise extent of works will not be known until post-consent, when a contractor is appointed and the specific vehicles to be used is known. The Applicant is therefore seeking compulsory powers over the SRN without being able to identify the specific works for which those powers are said to be needed. **Alternative to CA/TP**	As set out in the **Applicant's Response to Deadline 3 Submissions [REP4-034]**, the Applicant's general approach of seeking powers of compulsory acquisition (CA) and temporary possession (TP) in the **draft DCO [APP/3.1.5]** and, in parallel, conducting negotiations to acquire land and rights by agreement, accords with paragraph 26 of the Department for Communities and Local Government Planning Act 2008: Guidance related to procedures for compulsory acquisition of land (2013). The Applicant set out its position regarding alternatives to CA/TP and compliance with legal/statutory tests (including necessity and proportionality) in full detail during Compulsory Acquisition Hearing 1 (CAH1), and therefore refers to the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at CAH1 [REP4-036]** rather than repeating those submissions again in this response. Whilst there may be an alternative procedure proposed by National Highways, and (as stated repeatedly throughout CAH1) the Applicant will seek to reach voluntary agreement with National Highways at the appropriate time, the TP powers in question are required to be included in the **draft DCO [APP/3.1.5]** as they are necessary as a fallback position to ensure that the Scheme's progression, once consented, is unimpeded. For example, in relation to access, if there is a dispute under the protective provisions with National Highways (whereby National Highways deny access under that, or any other, procedure) that is taken to arbitration and found in the Applicant's favour, the TP powers would (in that case) represent a more efficient method for the Applicant to obtain the necessary access than any other procedure. This is one

	NH maintains that an available alternative exists. Works of this kind are routinely managed through National Highways' standard AIL notification processes - ESDAL (Electronic Service Delivery for Abnormal Loads) and can be authorised by agreement under NH's protective provisions (PPs) or via a mini section 278. This is how such works are ordinarily dealt with on the SRN. National Highways does not object to the Applicant obtaining access by this means, and for the required temporary works to be implemented once understood and agreed. There is therefore no impediment to the development proceeding without temporary possession powers in the DCO. This approach has been adopted in practice. In the Hornsea Project Three Offshore Wind Farm DCO, the Applicant did not acquire temporary possession rights over the SRN for AIL. Instead, it entered into a mini section 278 agreement to secure AIL movements, with the works carried out by National Highways' maintenance contractor, which is NH's preferred approach for what is essentially maintenance activity. **Necessity and Proportionality** There is no express statutory test for temporary possession equivalent to sections 122 and 123 of the Planning Act 2008 for compulsory acquisition. However, paragraph 5.8 of the DCLG guidance, Guidance on Preparing an Application: Part 2 — Application Contents, is clear: the Statement of Reasons should explain why temporary possession powers are necessary and proportionate to enable the development to proceed without impediment. The Applicant fails that test on both limbs. The powers are not necessary, because a well-established alternative mechanism exists and National Highways is willing to facilitate access through it. They are not proportionate, because the works are — on the Applicant's own account — limited, temporary, and confined to the construction phase. Seeking compulsory powers over the SRN for works of this character, when they can be authorised by agreement, is clearly disproportionate. A preference for compulsory powers on a precautionary basis, where the Applicant cannot identify the works requiring them, does not satisfy the threshold. **Conclusion** Whilst PPs are being negotiated between the Applicant and NH, NH maintains that even with the PPs in place, TP powers are still not justified. The works are limited, temporary, and deliverable through National Highways' established processes — as was done in the Hornsea Three DCO. The Applicant has noted that once Protective Provisions are agreed between the Applicant and National Highways, National Highways will be in a position to withdraw its objection. That is not the case. National Highways' position will remain that it considers that the temporary possession powers sought, for the reasons set out above, do not meet the statutory tests. National Highways therefore invites the Examining Authority to conclude that the temporary possession powers are neither necessary nor proportionate and should not be included in the Book of Reference. In response to the ExA's query regarding whether the removal of National Highways' plots from the Book of Reference would also necessitate a corresponding amendment to the Land Plans to remove the relevant National Highways plots (being the A47 junction with the A1065), NH confirmed that this would be the case. In response to the above, the Applicant suggested that there are a number of other DCOs in which National Highways has agreed to temporary possession powers over the SRN, and the Applicant provided a list of examples. In response, NH confirmed that the DCO examples provided by the Applicant would need to be considered	example of where the TP powers could be needed as the ultimate backstop between the parties – again, the Applicant notes that it will not necessarily seek to exercise these powers, preferring voluntary agreements/procedures with all parties, but it remains necessary for these powers to be included in the **draft DCO [APP/3.1.5]** as an appropriate fallback position and as a last resort (in order to avoid a position whereby the Scheme is impeded, which would undermine and counteract the public interest benefits of the Scheme that the Secretary of State would have to have considered by making the Scheme). The Applicant also notes that, in respect of other solar DCOs where a similar approach is being taken, the Green Hill, Lime Down and Light Valley Solar DCOs all seek temporary possession powers over National Highways' land in respect of works that reference the AIL and/or which match those listed at Work No. 8 in Schedule 1 of the **draft DCO [APP/3.1.5]** for this Scheme. The Applicant, therefore, does not agree that the plots in question should be removed from the **Book of Reference [REP3-011]**. The Applicant accepts that the parties are likely in a position of 'agreeing to disagree' on this matter, and therefore the Secretary of State will decide on this matter when determining the DCO. The Applicant wishes to clarify that its reference to the withdrawal of National Highways' objection was solely in respect of the protective provisions (negotiations of which are ongoing between the parties) – i.e. once those protective provisions (and corresponding side agreement) are agreed and signed by the parties, the Applicant understands that National Highways' objection in respect of matters relating to protective provisions will be withdrawn (but not National Highways' objection in respect of matters that do not relate to protective provisions, as set out in the 'split' shown in the **SoCG with National Highways [APP/5.17.2]**.

	further to ensure parity. However, in the first instance, NH noted that certainly the London Luton Airport Expansion DCO is not comparable, as it did not involve temporary maintenance-type works and did not relate to AILs, instead concerning access to NH land to construct permanent SRN mitigation works. Post Hearing Note:- Notwithstanding the comment above in relation to reviewing the Applicant's list of examples of other projects were NH has agreed to temporary possession, it is noted that the Applicant referred to both the proposed Lime Down Solar DCO (currently at examination) and the Yorkshire Green Energy Enablement Project DCO. In relation to Lime Down Solar the only works affecting the SRN relate to a crossing of the M4 with an underground cable. There is no other NH operational land involved. Accordingly, the DCO is therefore for the construction of permanent works under the SRN and is therefore not comparable with the situation at the Droves. In relation to the Yorkshire Green Energy Enablement DCO, the works affecting the SRN all relates to access for permanent over head line works, which again, is not comparable with the proposals relating to the Droves. None of the examples quoted provide a suitable comparison as they relate to permanent works on NH operational land, as opposed to temporary works of a maintenance nature, with scope unknown pre-consent, and where an alternative established mechanism exists.	

4. The Applicant's responses to Elected Representatives

Reference	Comments	Applicant's Response
James Wild- Deadline 4 Submission [REP4-056]		
JW-1	Page 1, Cumulative Impact and Agricultural Land Loss- Parts of Paragraphs 1 and 2 The Environmental Statement initially justified selecting this site based on desk-based mapping indicating the land was "likely to be some of the lowest quality land". However, subsequent Agricultural Land Classification (ALC) field surveys established over 50% of the site is BMV farmland, with a further 40% classified as moderate quality. The Applicant failed to revisit site selection or re-evaluate alternative sites once that initial assumption was disproved. While the Applicant treats the loss of BMV as a routine factor in the "planning balance", this ignores the clear direction set out in national guidance to actively avoid Best and Most Versatile (BMV) farmland "where possible". There is no absolute need to use this land when poorer quality could be preferred. Furthermore, relying on macro statistics - claiming a "negligible" 0.15% county impact and referring to Norfolk's 94% BMV baseline - bypasses NPPF requirement that planning decisions must reflect local circumstances. Using Norfolk's overall high agricultural quality to excuse developing prime farmland could set a precedent to justify industrialising most arable sites across East Anglia. Locally, Droves and High Grove create a 6,700-acre contiguous solar sprawl that threatens domestic food security and involves the permanent, irreversible export of 250,000 tonnes of Grade 2 BMV topsoil from Field 27.	The Applicant has set out the site selection process and justifications in Appendix 1 of the **Planning Statement [AS-076]** and in **ES Chapter 4: Reasonable Alternatives and Design Evolution [REP3-028]**. This outlines that the suitability of the land for solar development is due to a number of factors including the lack of landscape and environmental statutory designations, limited residual receptors, and accessibility from a major highway network. Therefore, and in accordance with NPS EN-3, the suitability of the siting of the Scheme is not just based on the quality of the land, there are multiple factors which contribute to the selection of land. The Applicant recognises the preference in policy for poorer quality land to be used over BMV farmland, but as set out in the **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]**, the majority of Norfolk is predicted to be of BMV quality. Poorer quality land is generally not available, and the Applicant has set out in the **Planning Statement [AS-076]** that the Scheme is classified as Critical National Priority infrastructure and meets the tests set out in paragraph 4.2.30 of NPS EN-1 for the Secretary of State's decision-making process. The provisional ALC mapping and the predictive Likelihood of BMV maps, referenced in **ES Chapter 11: Soils and Agriculture [AS-080]** (Plate 11-1 and Plate 11-2) indicated that this was likely to be some of the poorest land in Norfolk. The 2026 Predictive ALC Map for England (Plates 11-44 and 11-45) continue to predict this as some of the poorest quality land in Norfolk. The Applicant has produced a **Report on Interrelationships between Projects [APP/8.3.2]** which sets out how the Scheme and High Grove Solar are collaborating and details the control measures in place within the DCO documentation. Current food security levels in the UK are stable, as assessed in **ES Chapter 11: Soils and Agriculture [AS-080]** at paragraph 11.8.95 et seq. Food supply in the UK involves a complex international supply chain, as it has done for several centuries. Food production is not measured or operated on a local basis, except for small niche products. The evidence clearly shows that the effect on local and national food production and security will be negligible. Paragraph 11.8.101 of **ES Chapter 11: Soils and Agriculture [AS-080]** identified that in 2025 some 444,000 ha of arable land was in non-food-producing agri-environmental uses nationally. The June 2026 figures, published 29 September 2026, show that in 2026 the figure had risen to just over 483,000 ha. In 2025 over 42,000 ha of arable land in Norfolk was uncropped, over 53 times the size of the 799 ha of arable land within the Site.
JW-2	Page 2, Defence Infrastructure, Radar Mitigation and NSIP Status, Paragraphs 3 and 4 A key question is should those arrays not be built due to DIO assessment on height, what would the impact on the overall application be and its status as a NSIP application generating 500 MW? How much power generation in MW would be lost by removing these fields from the site? At para. 582 in the ISH3 the Applicant's representative made an assertion but with no specific answer. How is it acceptable to approve an application with this issue outstanding?	The **Design Principles, Parameters and Commitments [APP/5.8.5]** details that the PAR Mitigation would be: • a maximum height of 4.5m. • located within Work No. 1(a) only. • maximum depth fence foundations no greater than the piled mounting structures. • either a fence and/or a bund.

	Bunds of this scale, potentially 20 metres wide at base, would be incongruous to the landscape - yet this is not covered in the Landscape and Visual Impact Assessment despite the likely scale.	• implemented prior to the construction of any part of Work No. 1(a) within the areas shown as Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 on **RAF Marham Mitigation Areas Plan [APP/8.26.1].** The **Design Principles, Parameters and Commitments [APP/5.8.5]** details that if a bund is specified: • the slopes of the bund will not exceed 1:3 and will be seeded with grass only; and • material will be sourced from within the Site. The **Design Principles, Parameters and Commitments [APP/5.8.5]** details that if a fence is specified: • Clearances above ground or mammal gates will be included within the deer fence to permit the passage of wildlife; • Will consist of non-reflective materials; • Will not replace the deer fence around the perimeter of Solar PV Arrays consisting of wire mesh and wooden or metal posts; • Will be sited no closer than 4m to the security fencing; and • Externally finished to be in keeping with the prevailing surrounding environment. The exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction but will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. Additional assessment information and narrative regarding potential effects as a result of the PAR Mitigation has been provided, as follows: • **ES Chapter 6: Landscape and Visual [APP/6.2.2]** has been updated with additional assessment information and narrative regarding potential landscape and visual effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant landscape and visual effects as a result of the proposed PAR Mitigation. • The **Technical Information Note - Landscape and Visual [APP/8.18.1]** has been updated with additional assessment information and narrative regarding potential landscape and visual effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant landscape and visual effects as a result of the proposed PAR Mitigation. • **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4.1]** has been updated with additional assessment information and narrative regarding potential residential visual amenity effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant effects as a result of the proposed PAR Mitigation. • **ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4.1]** has been updated with additional assessment information and narrative regarding potential amenity and recreation effects as a result of the PAR Mitigation. The updated assessment concludes that there would be no new significant effects as a result of the proposed PAR Mitigation. The Applicant can confirm that, even in the unlikely event that no solar panels are installed in the specific mitigation areas shown on the **RAF Marham Mitigation Areas Plan [APP/8.26.1]**, the Scheme's total MW would still constitute an NSIP. Paragraph 2.3.1 of the **Statement of Need [APP-042]** sets out the legislative requirement for the UK to achieve net zero by 2050 through the Climate Change Act 2008 (2050 Target Amendment). This requirement and the CNP presumption applied to this Scheme as set out in Section 9.5 of the **Planning Statement [AS-076]**, highlight the need to maximise the capacity of the Scheme to meet the Government's objectives for the energy system.
JW-3	Page 2, Construction Traffic Management and Highway Safety The proposal involves a two-year construction period generating between 600 and 622 daily two way vehicle movements along the A1065 and A47. Local testimony	The Applicant notes the concerns raised regarding construction traffic and highway safety. The assessment is based on a worst-case 628 daily two-way vehicle trips, including 96 two-way HGV trips. Construction routing and mitigation are set out in the **oCTMP [APP/7.7.4]** that is provided in support of the

	identifies the A1065 as one of the most dangerous roads in the county, while Norfolk records the highest fatal road collision rate in the UK, yet no localised road safety risk assessment has been undertaken. Perimeter fencing may also funnel wild deer across high-speed stretches of the A1065, increasing collision risks. Deferring key routing, safety and mitigation measures to an outline Construction Traffic Management Plan after consent leaves important highway safety questions unresolved.	DCO, including delivery management, vehicle tracking, route signage, banksmen and a temporary 40 mph speed limit on the A1065. These measures, including the routing for all vehicles, will be carried through into the detailed CTMP secured by the DCO. **ES Appendix 9.2: Traffic Assessment [APP-163]** includes a review of personal injury collision data for 2022–2024 and a Stage 1 Road Safety Audit of the proposed access arrangements. The assessment identified no collision clusters or residual highway safety concerns. Regarding perimeter fencing, the fencing design is secured through the **Design Principles, Parameters and Commitments [APP/5.8.5]** and is considered to be include the appropriate features to avoid funnelling deer onto the A1065. Along the A1065, deer fencing will be placed around each individual field (Fields 20, 21, 25 and 26) so as to not bisect the hedgerow boundaries and to allow for the continued free movement of deer along the existing hedgerows away from the A1065.
JW-4	Page 2, Decommissioning, Soil Protection and Groundwater Risks, First sentence of paragraph The application does not provide a ring-fenced, legally secured decommissioning fund for the development, while key restoration details are deferred to later management plans.	As set out in the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at CAH1 [REP4-036]**, there is a requirement to decommission the Scheme in Requirement 20 of the **draft DCO [APP/3.1.5]** and failing to comply with that requirement would be a criminal offence. The requirement to decommission the Scheme would sit with the owner at the time of decommissioning, and that is covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant, or in the event of insolvency of the Applicant. The amount of such decommissioned security would be regularly revalued throughout the lifecycle of the Scheme and topped up if necessary. A ring-fenced decommissioning fund is, therefore, unnecessary, as the legal mechanisms of the **draft DCO [APP/3.1.5]** (i.e. a statutory instrument) ensure that decommissioning must take place.
JW-5	Page 2, Substation Uncertainty The required substation also remains unresolved. NGET has not committed to constructing infrastructure within the Order limits and has confirmed its review will not conclude until 2027 or 2028. NPS EN-1 paragraph 3.3.79 requires connected infrastructure to be demonstrably deliverable. Without a confirmed and binding grid connection point, the Applicant has not demonstrated the infrastructure can be delivered as proposed. The application remains premature.	As set out repeatedly throughout the Examination, the DCO Application is not premature in respect of this (or any) matter. The Applicant refers, for example, to the **Applicant's Response to Written Representations and other Deadline 1 Submissions [REP2-028]**, particularly with reference to **CAPC2-21**, **NGET3**, **NGET8**, **GF2** and **JW1**, where its full response in relation to this matter is set out.
George Freeman - Deadline 4 Submission [REP4-055]		
GF-1	Page 2, County Scale: the magnet effect • The evidence available to me suggests that once an area is identified as having suitable grid connectivity, it becomes a magnet for further applications, as developers and landowners pursue guaranteed subsidy income. Land-agent reports indicate c.20,000 acres of further solar development "in the pipeline" locally. • Approving Droves alongside High Grove would reinforce Central Norfolk's position as a target area for this pipeline, with a cumulative knock-on impact on agricultural investment and production across one of the UK's leading agricultural counties, not merely on the two sites under examination.	A suitable grid connection is currently the catalyst for renewable energy development in an area, and this is driven by the government's net zero targets, namely the net zero by 2050 target established in the Climate Change Act 2008 (2050 Target Amendment) Order 2019 and referenced to in paragraphs 3.2.1 and 3.2.2 of NPS EN-1. Therefore, it is necessary to make the most of this grid capacity through the roll out of renewable energy projects to ensure these targets are met. This does, however, mean that applications for renewable energy projects can be made in a close proximity to each other / the suitable grid connection. The Applicant has accounted for this in the ES by providing a cumulative assessment within each of the technical topic chapters following the approach set out within **ES Chapter 2: EIA Process and Methodology [APP-051]**. The Applicant has produced a **Report on Interrelationships between Projects [APP/8.3.2]** which sets out how the Scheme and High Grove Solar are collaborating and details the control measures in place within the DCO documentation. The Applicant has sought to continue monitoring other schemes with relevant cumulative effects, and refers to **ES Figure 2.1: Cumulative Schemes - Within 25km [REP3-057]** and **ES Figure 2.2: Cumulative Schemes - Countywide [REP3-040]** for the latest updates.
GF-2	Page 2, Cumulative risk and footprint • Cumulative impact is not only a question of combined land area. Operational risks — fire, noise, and glare among them — are assessed scheme by scheme, but I have seen no assessment of how these risks are magnified when multiple large-scale solar	The Applicant's assessment of cumulative effects has been undertaken in line with the requirements of the EIA regulations and the Planning Inspectorate's Advice Note on cumulative effects assessment, and the approach is detailed in full within **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

	and battery storage sites sit in close proximity along the same corridor. I ask the Examining Authority to require the Applicant to assess cumulative impact at each of these scales, at local, sub-regional, and county level, and to assess cumulative risk as well as cumulative footprint.	topic chapters have been undertaken in accordance with the relevant topic-specific guidance and best practice approach, assessing a reasonable worst-case scenario. Where relevant to each chapter, the impact of cumulative schemes within the Zone of Influence has been considered and reported on within the Environmental Statement. For example, the noise assessment (as detailed in **ES Chapter 10: Noise and Vibration [REP3-030]**) considers cumulative effects from both High Grove Solar and JAFA Solar Farm. The assessment concludes that cumulative noise effects from construction and construction traffic are not significant in EIA terms and outlines a commitment to achieve non-significant cumulative operational effects at all receptors. This commitment is set out in the **outline Operational Environmental Management Plan (oOEMP) [APP/7.8.5]**, to be implemented in the detailed OEMP and therefore secured as a DCO requirement.
GF-3	Page 2, Cumulative impact on the local economy • Where farms convert wholesale to solar generation and cease agricultural production entirely, the effect is more severe than a gradual, pro-rata, loss of output implies, and this distinction has not, to my knowledge, been assessed cumulatively across the Solar Belt. • Norfolk's rural tourism economy depends on the visual and historic character of this landscape. A continuous corridor of industrial-scale infrastructure across Central Norfolk risks displacing visitors towards more attractive landscapes elsewhere in the county or beyond, with a knock-on effect on the businesses, jobs, and local supply chains that depend on that visitor economy. • I ask that the Applicant's socio-economic assessment address these cumulative effects on farming employment, tourism-related jobs, general investment into the region and local supply chains across the Solar Belt as a whole, rather than site by site.	The Applicant will take each of the bullets in turn. The effects on agricultural businesses have been set out in **ES Chapter 11: Soils and Agriculture [AS-080]**, the **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land Quality [REP1-072]** and the **Update Note on Farm Impacts for Breckland Council (Appendix 1 of Statement of Common Ground with Breckland Council [APP/8.11.3])**. The specialist crops grown within the Site on periodic rotation are grown by outside contractors. The livestock enterprises will relocate nearby or continue. There will be some adverse impacts for supply businesses, including grain merchants, but there will be benefits for others (including livestock hauliers and veterinary surgeons), and overall the agricultural labour and related industry will not be significantly adversely affected. The cumulative effects assessment across the ES chapters considers the relevant developments for each effect within the study area defined for that assessment. The matters considered relevant to the assessments were considered through the EIA scoping process and are addressed in the relevant chapters in the ES. They are not assessed as a single, separate "Solar Belt" effect; rather, cumulative effects are assessed by topic and for the relevant receptors and study areas. Cumulative effects on agricultural businesses have been considered in **ES Chapter 14: Socio-Economics [AS-078]**. The assessment considers the Scheme alongside High Grove Solar and East Pye Solar. It recognises that these schemes would reduce the land available for conventional agricultural production, but also considers the information available on affected farm businesses, including their access to land outside the Order limits. Taking these matters into account, the cumulative socio-economic effect on agricultural businesses is assessed as minor adverse and not significant. Cumulative effects on employment, skills, training and supply-chain provision are also considered in **ES Chapter 14: Socio-Economics [AS-078]**. Taking account of the anticipated initiatives associated with High Grove Solar Farm and East Pye Solar Farm, the cumulative effects on education, skills, training and supply-chain provision are assessed as major beneficial during construction and decommissioning and moderate beneficial during operation, both significant. The Applicant will seek to align and coordinate these initiatives with other projects in the area where possible. Tourism-related effects have been considered in **ES Chapter 14: Socio-Economics [AS-078]**, **ES Chapter 6: Landscape and Visual [APP/6.2.2]** and **ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4.1]**. Mitigation measures are detailed in full within the **oLEMP [APP/7.11.3]**. The LVIA concludes that there would be potential long term significant adverse landscape effects upon Landscape Character Areas (LCA) D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCAs are only judged to be significant where they fall within the Order limits, given the relatively enclosed nature of the field parcels and vegetated context. There are no potential long term significant adverse landscape effects beyond the Order limits. Castle Acre, South Acre and the wider Nar Valley are broadly included within LCA I9, F1 and G3 respectively. The LVIA concludes that there are no long term significant adverse landscape effects upon these LCAs. Equally, the LVIA determined that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area. The cumulative assessment of tourism assets in **ES Chapter 14: Socio-Economics [AS-078]** considers the relevant schemes within the study area for the effect. It identifies no operational impacts on tourism assets and concludes that the cumulative effect would be minor adverse and not significant.

GF-4	Page 2, Cumulative impact on habitats and wildlife corridors • The combined footprint of Droves, High Grove, and the further schemes reportedly in the pipeline would, if consented without coordinated assessment, create a continuous belt of industrial-scale infrastructure many miles in length across Central Norfolk. I am not aware of any assessment of what a barrier of this scale would mean for the movement and migration of local flora and fauna, as distinct from the habitat loss and fragmentation assessed at each individual site such as this one. • I ask the Examining Authority to require the Applicant to produce, or commission, a landscape-scale ecological connectivity assessment addressing the cumulative effect of the emerging Solar Belt on wildlife corridors, rather than relying solely on site-specific habitat assessments.	The Applicant disagrees with the statement that the Scheme along with other cumulative developments would create "a continuous belt of industrial-scale infrastructure many miles in length across Central Norfolk". Whilst the plan submitted by Breckland District Council in its **Responses to ExQ2 [REP3-092]** would appear to show a continuous belt of infrastructure, it must be acknowledged that the areas shown are the planning application / or DCO boundaries within which all the elements of a project would be located. The maximum extent of above ground infrastructure is smaller than that of the planning application / or DCO boundaries. For example, the DCO boundary for High Grove Solar includes large extents of underground cabling and areas for mitigation and enhancement, which would still allow for the movement and migration of local flora and fauna throughout the District. Indeed, as set out within the information submitted by the Applicant into this Examination, the Scheme will strengthen existing key wildlife movement corridors including through planting up of gaps in existing hedgerows and tree lines, increasing the width of existing field boundary vegetation corridors and creation of new hedgerows and tree lines. The Applicant, therefore, does not consider the need to undertake a landscape-scale ecological connectivity assessment, as there is no continuous belt of industrial-scale infrastructure that would prevent the movement and migration of local flora and fauna. It should also be noted that the Applicant, through the design process, has considered the movement of local flora and fauna throughout the Site. As set out in the **Design Approach Document [AS-009 - AS-011]**, the Applicant established a series of Design Principles at the outset of the Scheme. Design Principle 3.1 is to "integrate the Scheme into the local environment and allow the movement of wildlife through the Site." Section 8.4 of the **Design Approach Document [AS-009 - AS-011]** explains how this design principle has informed the design and where these commitments are secured within the **draft DCO [APP/3.1.5].**
GF-5	Page 3, Agricultural land use, food production, and soils: building on the Examining Authority's own action point • I ask that the Applicant's response be tested against the correct scale of assessment. My understanding is that the Applicant's food-security case has rested on a national comparison — that the land taken represents a fraction of a percent of the UK's total utilised agricultural area. That figure, even if accurate, does not answer the Examining Authority's question: the effect on food production in this part of Norfolk, taken cumulatively with High Grove, not against a national baseline that renders any single scheme statistically negligible by design. • Both Natural England and the Applicant agree that over half the site is Best and Most Versatile land (Natural England: 54%; Applicant: 51.7%). Combined with High Grove's own BMV land take, this is, in my view, hugely significant for a mostly rural & partly semi-rural constituency whose economy depends on productive farmland, and should be assessed as such. • I have seen no evidence that the Applicant's response addresses long-term soil health, consisting of structure degradation, organic matter loss, and reinstatement, across a 3040-year operational life, in combination with High Grove. I ask that any grant of consent be conditional on binding, monitored soil recovery commitments, assessed cumulatively with neighbouring schemes rather than in isolation.	The Interested Party suggests that the correct way to measure effects on food security is on a local basis, but the Applicant notes that to do so would not reflect the way food is produced, processed and consumed in the UK. The likelihood of food produced on the Site being consumed locally, either by humans or animals, is remote. The agricultural sector is mostly a national or international sector. Even the slaughter of livestock is often undertaken at long distances from where animals were reared. The effects on the sector are considered in **ES Chapter 11: Soils and Agriculture [AS-080]**. As set out in the **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]** and, in response to matters raised by Breckland Council, in the **Update Note on Farm Impacts for Breckland Council (Appendix 1 of SoCG with Breckland Council [APP/5.11.3])**, the area of arable land currently in agri-environmental uses and hence non-food producing, is almost 25 times larger than the 799 ha of the Site in respect of Breckland and South Norfolk, and 53 times larger in respect of Norfolk as a county. There is no evidence of any consequential local food security or supply consequence. Soils will benefit from being rested long term from intensive arable use. This is recognised by, for example, the British Society for Soil Science (see **ES Chapter 11: Soils and Agriculture [AS-080]** paragraph 11.8.83). There will be no degradation of soil structure, which will improve from long-term grassland cover. Organic matters will increase significantly. The potential for adverse effects from construction and decommissioning will be controlled through a Soil Management Plan (as secured via the corresponding DCO requirement), an outline of which is provided within **oSMP [REP1-062]**.

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

Reference	Comments	Applicant's Response
Antony Morgan [REP4-061]		
AM1-1	**Page 1, Section 2** 2.2 The applicant's proposal cannot be evaluated in a policy vacuum. The Droves Solar Farm spans over 2,000 acres of rural landscape north of Swaffham. Crucially, it sits directly adjacent to another proposed mega-project, the 4,000-acre High Grove Solar scheme. 2.3 Together, these projects threaten to flood a localized, low-demand rural pocket with an unprecedented volume of intermittent generation. This structural over-supply violates the balanced deployment intentions of NPS EN-3 by creating a high concentration of land conflict without serving any unmet localized demand.	The **Statement of Need [APP-042]** sets out how NPS EN-3 outlines the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. The Site Evaluation Report, at Appendix 1 to the **Planning Statement [AS-076]** sets out the suitability of the Site, considering these factors outlines in NPS EN-3. The Applicant notes the concern regarding the proximity of the Scheme to High Grove Solar, and would refer the Interested Party to the **Report on Interrelationships between Projects [APP/8.3.2]** which sets out how the Scheme and High Grove Solar are collaborating and details the control measures in place within the DCO documentation. Additionally, the cumulative effect of other nearby schemes have been assessed and detailed in full within **ES Chapter 2: EIA Process and Methodology [APP-051]** and **ES Appendix 2.4: Cumulative Schemes [REP3-063]**. Cumulative effects have been afforded neutral weight in the planning balance and the effects themselves are subject to the approval of schemes in the area.
AM1-2	**Pages 1 and 2, Section 3** 3.2 According to the National Energy System Operator (NESO) Existing Agreement (EA) Register, this project under System ID 48882 requires a massive 650MW Solar PV capacity commitment. 3.3 The physical infrastructure required to safely export power from this specific area to major demand centers (such as London) does not exist. The applicant plans to connect via an entirely new Swaffham 400kV National Grid Substation, tapping directly into the existing Walpole-to-Necton 400kV overhead line. 3.4 This specific overhead line is a critical, highly congested corridor within the EC5 boundary and its Network S6/S7 sub-boundaries. Adding 650MW of solar generation here directly clashes with NPS EN-1 principles regarding efficient transmission planning, as it forces NESO to pay to curtail (turn off) local generation to maintain grid stability.	The Existing Agreement (EA) Register is a register of schemes compiled by the National Energy System Operator (NESO) which applied for a Gate 2 connection agreement as part of NESO's Connections Reform process. The register also includes the Associated Installed Capacity (i.e. the nameplate capacity) of each scheme, with separate entries for different technology components of co-located schemes. The register confirms that the Applicant proposes to deliver a scheme which maximises use of its grid connection capacity (500MW) by delivering a scheme with overplanting up to 650MWp, as the Applicant confirmed in answer to Q12.0.2 of **Applicant's Response to ExQ1 [REP1-069]**. Section 7.5 of the **Statement of Need [APP-042]** explain that connecting a large-scale solar scheme in the location proposed is not likely to cause any significant network constraints under either the economy or security criteria. Additionally, the inclusion of BESS as part of the Scheme will support operation of Scheme through any periods with a risk of constraint, and provide NESO with a cost-effective tool to help manage power flows on the NETS in the vicinity of the Scheme over its operational life. Further, the **Grid Connection Statement [APP-181]** explains that, following discussions with NGET, it was identified that capacity was available on the transmission circuits near to the Order limits, needing only a new National Grid Substation for the Applicant to connect the Scheme to the grid. Section 7.6 of the **Statement of Need [APP-042]** explains that it is the government's view that existing grid infrastructure must be used to the greatest possible extent; and that NPS EN-5 contemplates the need for new network infrastructure to connect forms of clean energy generation where the natural resource for their generation is available, and considers that without such network infrastructure development the Clean Power 2030 Mission cannot be achieved. The **Statement of Need [APP-042]** concludes that if existing underutilised grid infrastructure is not used to connect low carbon generation to consumers at the earliest available opportunity, the deployment of low carbon generation will be significantly slower and potentially a lower overall level of installed capacity would be achieved than would otherwise be the case. Therefore, the Scheme is wholly consistent with the government's view that there is an urgent need for new generation schemes to come forwards to deliver and sustain a Clean Power system, on the way to Net Zero by 2050. Section 8.4 of the **Statement of Need [APP-042]** explains that transmission constraints are less likely to cause curtailment at the Scheme during its operational life than may be experienced at other locations, and that the Scheme is unlikely to receive consumer-funded compensatory curtailment payments.

AM1-3	**Page 2, Section 4** 4.2 While the system ID register shows a substantial 500MW BESS capacity commitment, a battery only defers the injection of power into the grid; it does not expand structural network capacity. 4.3 During periods of high solar output, generation coincides with peak offshore wind output. Because this 500MW battery footprint is physically bound to the exact same trapped Walpole-to-Necton 400kV overhead line, it will be unable to discharge its stored energy when the wider EC5 boundary is congested. 4.4 The 2026 NPS revisions note that even CNP infrastructure must be weighed against severe systemic or environmental detriments. Because the BESS is structurally constrained from balancing the network at this node, the project will increase consumer-funded balancing costs without delivering usable power, failing to meet the criteria for urgent national benefit	A BESS is proposed as associated development to the principal solar site. The BESS would support the operation of the principal solar development by storing power when it is generated in abundance, and releasing it when demand is higher. At times when the BESS is not supporting the operation of the principal solar development, it may be useful for the BESS to support the national supply and demand balance by importing directly from the grid rather than from the co-located solar. In this way, the BESS is expected to support the Scheme, and also the grid, by storing otherwise wasted renewable energy and making greater use of structural network capacity by releasing it when it is needed. Section 6.9 and Figure 6-8 to Figure 6-12 of the **Statement of Need [APP-042]** provide more information on this topic. Section 8.5 of the **Statement of Need [APP-042]** describes the portfolio effects of renewable generation. Figure 8-1 of the **Statement of Need [APP-042]** shows that the average aggregate monthly output per unit installed capacity of a multi-technology portfolio of wind and solar assets is less variable than the average monthly output per unit installed capacity of each of the single technology portions of that portfolio, because periods of high wind and high insolation are often in antiphase with each other. The Applicant strongly disagrees with the conclusion reached in paragraph 4.4 of this representation. If, as is contemplated in the example described by the Interested Party, the wider EC5 boundary was congested, having a BESS within that boundary (i.e. the BESS proposed as associated development to the Scheme) which was able to store power for later release would provide a cost-effective and beneficial service for the National Energy System Operator to call on to reduce system constraints and system operational costs. Constraints would be partially relieved and power which may otherwise be wasted would be stored and released later, benefiting system security, affordability and decarbonisation.
AM1-4	**Page 2, Section 5 (conclusion)** 5.3 I urge the Examining Authority to recommend the refusal of this DCO application. Alternatively, the Secretary of State should legally restrict connection permissions until major regional grid infrastructure upgrades (such as the Norwich to Tilbury project) are fully operational to avoid critical network impairment.	The Applicant highlights that the Scheme is not reliant on other major regional grid infrastructure upgrades, such as Norwich to Tilbury, and that NPS EN-1 paragraph 1.1.7 outlines the "*as soon as possible*" approach recognised for ensuring the provision nationally significant low-carbon infrastructure and justifies the Scheme.
Antony Morgan [REP4-057]		
AM2-1	**Page 3, Executive Summary** When ambient temperatures drop to 0–5°C, the combination of low solar irradiance and sub-optimal chemical performance heavily degrades both generation capacity and BESS charging efficiency, failing the underlying legal test for CNP status.	As set out in the **outline Battery Safety Management Plan (oBSMP) [REP4-026],** BESS are fitted with an Environmental Control Unit (ECU) that maintain the internal temperature of the BESS to an optimum level for the cells. Failure of the ECU is reported to the Operational Control Room, and the BESS is taken offline until a repair has been completed. The Applicant notes that the BESS is 'associated development' for the purposes of the **draft DCO [APP/3.1.5]** (i.e. it is associated to the solar PV asset, which is the asset of the Scheme that qualifies as CNP). Further, the Applicant refers to its analysis of policy support provided in response to **AM2-3** below.
AM2-2	**Page 3, Point 3.1** While silicon solar panels are technically more efficient at moving electrical charges in colder temperatures, this chemical advantage is entirely negated by winter geometry. In December and January, Norfolk experiences low solar angles, heavy cloud cover, and short daylight hours. Solar PV arrays in East Anglia operate at a capacity factor of just 2% to 5% during these cold winter days, compared to over 25% in summer. Under NPS EN-3 Section 2.10, applicants must demonstrate that solar farms are optimized to make a reliable contribution to the energy mix. The applicant's generation models rely on high-yield summer data, masking the fact that for roughly 50 days a year, the asset provides negligible output, failing the policy intent of providing dependable, year-round decarbonisation.	The **Statement of Need [APP-042]** sets out the policy support for large-scale solar as part of the government's plan to decarbonise the energy system. Section 2.9 of the **Statement of Need [APP-042]** summarises the UK Solar Roadmap and explains that solar is at the heart of the government's mission to make the United Kingdom a clean energy superpower. It is one of the cheapest and quickest to build power sources in the UK and offers huge potential to boost UK energy independence, bring down bills and tackle the climate crisis. Section 3.3 of the **Statement of Need [APP-042]** confirms that NPS EN-3 commits the UK to sustained growth in solar capacity to ensure that the country is on a pathway that allows it to meet net zero emissions. As such solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector. Figure 8-2 of the **Statement of Need [APP-042]** shows how solar generation is indeed lower in the winter (when wind generation is higher) but that it is higher in the summer, when wind generation is lower. In combination with Figure 8-1 of the **Statement of Need [APP-042]**, the Applicant has demonstrated how a combination of renewable technologies, but primarily wind and solar, are expected to support the delivery of a dependable, year-round, low-carbon energy system, consistent with the Government's aims.

AM2-3	**Page 3, Point 3.2** At ambient temperatures between 0–5°C, internal chemical resistance in the lithium-ion cells spikes sharply, slowing lithium-ion diffusion within the anode. Forcing a standard charge rate during these 45–55 days risks lithium plating, which permanently degrades cell capacity and creates a severe long-term thermal runaway fire hazard. This directly conflicts with NPS EN-3 safety assessment requirements for co-located battery storage systems. Furthermore, to prevent degradation, the BESS must continuously run internal heating and HVAC systems to warm the cell enclosures. Instead of storing energy for the National Grid, the facility shifts from being a grid asset to a net parasitic consumer of grid energy, violating the system flexibility mandates embedded within NPS EN-1.	Section 6.9 of the **Statement of Need [APP-042]** explains that the BESS (proposed as associated development to the principle solar development) would support the operation of the principal solar development by storing power when it is generated in abundance, and releasing it when demand is higher. At times when the BESS is not supporting the operation of the principal solar development, it may be useful for the BESS to support the national supply and demand balance by importing directly from the grid rather than from the co-located solar. In this way, the BESS is expected to support the Scheme, and also the grid, by storing otherwise wasted renewable energy and making greater use of structural network capacity by releasing it when it is needed. The policy support set out in NPS EN-1 for flexible assets, including Battery Energy Storage Systems, is clear. For example: • Paragraph 3.3.5 – the need for increased flexibility of providing new storage and interconnectors; • Paragraph 3.3.6 – storage and interconnection can provide flexibility, meaning that less of the output of plant is wasted as it can either be stored or exported when there is excess production • Paragraph 3.3.25 – storage has a key role to play in achieving net zero when providing flexibility to the energy systems; and • Paragraph 3.3.26 – storage is needed to reduce the cost of the electricity system and increase reliability by storing surplus electricity. The Applicant therefore strongly considers that it is incorrect for this representation to suggest that a BESS is in “violation” of any policy positions set out in NPS EN-1. With regards to the comment on conflict with NPS EN-3. BESS are fitted with ECU that maintain the internal temperature optimised for battery performance. Failure of the ECU will auto-isolate the BESS and prevent any further charge or discharge from the BESS. In addition, the BESS battery management System monitors all cell temperatures and will prevent any battery charging below optimum temperatures. Charging will only commence when the battery temperature is at a set level.
AM2-4	**Page 4, Point 3.3** The Droves Solar Farm intends to tap into the heavily congested Walpole-to-Necton 400kV overhead line corridor via a new substation near Swaffham. Because solar generation drops precisely when winter peak demand rises, this facility fails to deliver localized grid relief, forcing expensive winter curtailments where the National Energy System Operator (NESO) must pay to keep the local network balanced	Section 8.5 of the **Statement of Need [APP-042]** describes the portfolio effects of renewable generation. Figure 8-1 of the **Statement of Need [APP-042]** shows that the average aggregate monthly output per unit installed capacity of a multi-technology portfolio of wind and solar assets is less variable than the average monthly output per unit installed capacity of each of the single technology portions of that portfolio, because periods of high wind and high insolation are often in antiphase with each other. Figure 8-2 of the **Statement of Need [APP-042]** shows how solar generation is indeed lower in the winter (when demand is currently higher) and that it is higher in the summer, when demand is currently lower. However, demand must be met by the combination of available supply and, in combination with Figure 8-1 of the **Statement of Need [APP-042]**, the Applicant has demonstrated how a combination of renewable technologies, but primarily wind and solar, are expected to support the delivery of a dependable, year-round, low-carbon energy system, consistent with the Government’s aims.
AM2-5	**Page 6, Section 6** The Applicant is hereby requested to provide a rigorous, transparent cross-examination of their structural designs against Ordnance Survey (OS) topographic data to address the following omissions in the current Environmental Statement: • The Applicant must confirm the absolute highest levels of equipment to be installed across the site, calculated explicitly using Ordnance Survey terrain models and Above Ordnance Datum (AOD) parameters. • The Applicant must supply a comprehensive digital overlay combining localized terrain spot-heights with the proposed maximum physical ceiling heights for all structural infrastructure, including the 25-acre BESS enclosures, associated HVAC cooling stacks, inverter platforms, and substation gantry systems.	The Applicant has undertaken a topographical survey of the Site to inform the design process and acknowledges that there are varying gradients across. The topography data, along with LiDAR data, has been used to model the maximum heights of the different elements of the Scheme, as shown in **ES Figures 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires (Parts A – D)** and **6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires (Parts A – D) [AS-023 - AS-037]**. In the **Applicant’s Response to ExQ2 [REP3-088]**, in respect of Q1.0.1, the Applicant explained how the topography and the maximum heights have been modelled and assessed within the ES. In addition, the Applicant, at Deadline 3, included details within Tables 3.3 and 3.4 of the **Design Principles, Parameters and Commitments [APP/5.8.5]** that sets out the maximum heights of the proposed infrastructure. These maximum heights have been set both in terms of AOD heights for specific areas, shown in Appendix 1 of that document, and maximum heights above existing ground levels.

	Given the rolling topography characteristic of the Castle Acre and Swaffham valleys, evaluating infrastructure purely on relative ground level ('Above Ground Level') is insufficient. The true visual, landscape, and heritage impacts on surrounding conservation areas can only be validated by analyzing absolute AOD heights to ensure taller assets are not masked by terrain contours.	The detailed design, including the location and configuration, of the National Grid and Customer Substation within Field 27, has not yet been finalised; therefore, these maximum height parameters allow for flexibility in the detailed design of the proposed base levels and ground engineering whilst providing certainty regarding landscape and visual impact. The detailed design of the Scheme must be in accordance with the details set out within the **Design Principles, Parameters and Commitments [APP/5.8.5]**–. This is the case for all Work Nos., as the **Design Principles, Parameters and Commitments [APP/5.8.5]** contains details for all Work Nos. and the **outline Construction Environmental Management Plan (oCEMP) [APP/7.6.5]**, the **oOEMP [APP/7.8.5]** and the **oDS [REP3-067]** all reference these parameters which must be met by the Applicant and its contractors. Should the Scheme gain consent, the Applicant will be required to demonstrate how the detailed design accords with the maximum above existing ground level and AOD height parameters.
AM2-6	**Page 7, Section 8** 1. What are the exact geometric dimensions, storage capacities, and physical footprints of the underground tanks designated for clean firefighting water supply? 2. What are the exact geometric dimensions, storage capacities, and physical footprints of the underground containment tanks designated for capturing highly contaminated, toxic firefighting runoff water? 3. At what precise depth below natural ground level are these underground clean and contaminated water tanks to be physically positioned? 4. Will the excavation profile for these tanks penetrate local groundwater tables or sub-surface flood levels? If not, please indicate the exact floor and ceiling heights of these tanks relative to Ordnance Survey topographic height levels (AOD) to prove total isolation from regional water paths. This detailed specification is essential to ensure that any potential BESS thermal runaway event does not result in the uncontrolled discharge of lithium-heavy toxic firewater into local aquifers, the sensitive River Nar catchment area, or regional drainage systems.	1. As outlined in Section 12.4 (BESS and Substations Surface Water Management of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]**, the layout of the Scheme is not fixed and, as such, there is a commitment to design the drainage system to serve Work Nos. 2 to 4 to have sufficient storage for fire suppressant in line with the relevant guidance at the time of detailed design. 2. The Applicant refers to its response to point 1 above. 3. As outlined in Section 12.4 (BESS and Substations Surface Water Management) of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]**, the drainage system to contain fire suppressant will utilise either underground or overground tanks and the design of these structures will be undertaken following detailed design of the Scheme, as secured by Requirement 11 of the **draft DCO [APP/3.1.5]**. 4. As shown on **ES Figure 12.8: Depth to Triangulated Baseline Groundwater Elevation [REP3-049]**, groundwater depth below the surface in Work Nos. 2 to 4 is between 15 to 30 m below ground level at its maximal elevation. As such, there will be substantial headroom between groundwater and the base of either aboveground or belowground structures to contain fire suppressant. This approach is consistent with other parametrised DCO applications where the detailed design of the proposed drainage system is secured and provided prior to the construction phase.
AM2-7	**Page 8, Section 10** 10.1 Why is freehold compulsory acquisition being sought when a time-limited lease (or lease option) of sufficient duration to cover the operational life of the scheme (typically 40–60 years) would provide the Applicant with all necessary control, exclusive possession and security of tenure for construction, operation, maintenance and decommissioning? A lease arrangement is the standard commercial model for the majority of UK solar farms and would avoid the permanent alienation of agricultural freehold title. 10.2 Can the Applicant demonstrate, with clear evidence, that it has met all the requirements and legal tests for the exercise of compulsory acquisition powers under Article 21 of the draft DCO and section 122 of the Planning Act 2008? In particular, can it show that the land is required for the development, or is required to facilitate or is incidental to the development, and that there is a compelling case in the public interest? 10.3 Given that compulsory acquisition is expressly recognised as a power of last resort, to be used only where negotiations have broken down or are demonstrably incapable of delivering the necessary interests, how does the Applicant reconcile the continued pursuit of freehold CPO powers with its own statements that discussions with landowners remain positive and productive? 10.4 What specific evidence has the Applicant provided (or will it provide before the close of the Examination) to show that every reasonable alternative to freehold	10.1 As set out in the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at CAH1 [REP4-036]**, the Applicant's approach of seeking freehold compulsory acquisition powers over the land shown coloured pink on the **Land Plan [APP-008]** is extremely well-precedented across numerous made solar DCOs. Effectively, the Applicant is seeking a lease of this land via the Option Agreement with the relevant landowner. That Option Agreement with the relevant landowner that clarifies that the 'pink' land will be returned to the landowner at the end of the decommissioning of the Scheme. Permanent acquisition is 'permanent' in the context of the Scheme's lifecycle, but will be returned to the landowner after decommissioning of the Scheme. The Applicant does, however (as set out in the **Statement of Reasons [REP3-009]**), require the compulsory acquisition powers (including in respect of freehold acquisition) set out in the **draft DCO [APP/3.1.5]** to protect against a scenario whereby, for example, contracts are not adhered to or are otherwise set aside (including if the freehold owner of the relevant land, where agreement has been reached, does not grant a lease of the land in accordance with the terms of the Option Agreement). The Applicant's proposed approach is proportionate and appropriate (and, again, is extremely well-precedented across numerous made solar DCOs). 10.2 The Applicant considers that it set out its case in respect of these matters (including requirements and tests) in full detail during CAH1, and therefore refers the Interested Party to the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at CAH1 [REP4-036]**. 10.3 Again, the Applicant addressed this matter in full detail during CAH1, and therefore refers the Interested Party to the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at CAH1 [REP4-036]**. However, to reiterate, the use and exercise of any of the compulsory acquisition or temporary possession powers by the Applicant are a fallback and last resort position, should the Applicant need to do so. It is necessary to include these powers in the **draft DCO [APP/3.1.5]** even if Option Agreements are entered

	acquisition – including long leases, options to lease, or acquisition of rights only – has been fully explored and exhausted with each affected landowner? 10.5 If negotiations are progressing satisfactorily, why is it necessary or proportionate for the draft Order to include the power to acquire the freehold of agricultural land on a compulsory basis, rather than limiting the powers to the acquisition of rights, temporary possession, or the confirmation of leasehold interests already under discussion? The Examining Authority is respectfully requested to require the Applicant to provide a clear, evidence-based justification for the freehold compulsory acquisition powers sought under Article 21, addressing each of the questions above, and to confirm whether a time-limited lease structure would not adequately secure the delivery of the authorised development while better protecting the long-term interests of the affected land owners and wider community.	into with all necessary parties, to protect the Scheme in the scenario where circumstances were to change, for example if the person with whom the Applicant has that Option Agreement dies or becomes insolvent – the Applicant would need these fallback powers to ensure that the Scheme could proceed without impediment. Otherwise, the Applicant would be in a position where the Scheme could be consented but the Option Agreement fails for a reason outside the Applicant's control, such that the Scheme cannot be progressed, which would undermine and counteract the public interest benefits of the Scheme that the Secretary of State would have to have considered by making the Scheme. 10.4 Again, the Applicant addressed this matter in full detail during CAH1, and therefore refers the Interested Party to the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at CAH1 [REP4-036]**. However, to reiterate, the Applicant has considered all reasonable alternatives to compulsory acquisition – negotiated agreements, alternative sites and modifications to the Scheme have been considered prior to making the DCO Application. None of the alternatives or modifications considered for the Scheme would remove the need for powers of compulsory acquisition and temporary possession over the Order land. All reasonable alternatives have been considered prior to the making of the DCO Application and such consideration has included reasonable factors at relevant stages, such as consultee comments, technical feasibility, economic factors and the minimisation of environmental and visual impacts and land take. Further, the Applicant has always sought to use the minimum power possible to deliver what is necessary to deliver in relation to each plot, i.e. the least impactful rights both in terms of nature of the rights and spatially. The Applicant's use of compulsory acquisition powers is intended to be proportionate. Where practicable, lesser powers of temporary possession will be used. The location and extent of land and rights has been carefully considered and designed in order to take the minimum amount of land required whilst ensuring that the Scheme continues to produce its benefits. The rights sought are therefore proportionate and necessary across the whole Scheme. 10.5 The Applicant considers that it has responded to this question in its responses to the Interested Party at 10.3 and 10.4 directly above. In respect of the Interested Party's final point (i.e. its request to the ExA), the Applicant provided a clear, evidence-based justification for the powers of compulsory acquisition and temporary possession sought via the **draft DCO [APP/3.1.5]** throughout CAH1, and therefore refers the Interested Party to the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at CAH1 [REP4-036]** in response to all matters raised.
AM2-8	**Page 9, Section 11** 11.1 Gate Status and TEC Register Position • What is the current Gate status (Gate 1 or Gate 2) of The Droves Solar Farm following the completion of the Gate 2 to Whole Queue process? Please provide the official NESO notification and the relevant extract from the current TEC Register showing Gate status, any refined TEC values, and the current contractual connection date. • Has any reduction been made to the contracted 500 MW export TEC or 500 MW import TEC as a result of the Gate process, queue re-ordering, or any subsequent contractual variation?	The Applicant's **Written Summary of Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071]** confirmed that as at ISH1, the Scheme had been notified by NESO that it has been prioritised as a Gate 1 connection in NESO's Connections Reform process. The notification letter cannot be provided to the Examination due to NESO's confidentiality requirements. The Applicant can confirm that, as at the date of writing this response, it remains the case that the Applicant has not yet received an Agreement to Vary (AtV) its existing grid connection agreement. Therefore, the TEC Register remains as it was prior to the Connections Reform freeze in March 2025. The **Grid Connection Statement [APP-181]** provides the key parameters of that agreement, which remains in place at this time. NESO's timelines suggest that the Applicant could expect to receive its AtV prior to the end of Q1 2027. The Applicant has not requested any reductions to the contracted 500MW import or export connection capacity. Further, the Applicant does not expect NESO to have unilaterally altered either the import or export connection capacity as a result of the gate process or queue re-ordering.
AM2-9	**Page 9, Section 11** 11.2 Readiness Criteria • Did the project meet the Gate 2 Readiness Criteria via the land-rights route or the planning-progress route? Please state which route was relied upon and provide the key evidence submitted to NESO. • If the land-rights route was used: what exact form of land rights (option agreement, lease, freehold or other) and what acreage were submitted as	The Applicant satisfied the Gate 2 Readiness Criteria, but did not satisfy the Gate 2 Strategic Alignment Criteria and therefore has received notification from NESO that it will receive a Gate 1 connection offer for the Scheme. A copy of this notification cannot be provided due to NESO's confidentiality requirements. However, projects which continue to demonstrate they are ready are expected to be reprioritised, especially as the government continues to refine its criteria for strategic alignment. It is anticipated that some projects currently in the queue may drop out. The Applicant will therefore keep developing the Scheme with the aim of securing a Gate 2 connection in a future round, and the Applicant will, of course, keep relevant parties updated as matters progress.

	evidence of readiness, and do those rights cover the full area required for the solar arrays, BESS, Customer Substation and the proposed National Grid substation? • If the planning-progress route was used: what specific planning milestone was relied upon, given that the Development Consent Order has not yet been granted?	
AM2-10	**Pages 9 and 10, Section 11** 11.3 Connection Date Integrity and Strategic Alignment • Does the project still hold a firm contractual connection date of October 2033, or has that date become provisional, deferred, or subject to further re-assessment under a Gate 1 position? • Was the project assessed as strategically aligned with the Clean Power 2030 zonal capacity allocations for solar generation and for battery storage in the relevant transmission zone?• If it was not prioritised in Phase 1 or Phase 2, what is the earliest realistic connection date now available to the project in this zone?	In response to the first bullet point, the Applicant refers to its answer to **AM2-8** and **AM2-9** above. In response to the second bullet point, the Applicant respectfully directs enquiries on whether the Connections Reform process was run appropriately to NESO. In response to the third bullet point, the Applicant respectfully directs enquiries on future connection dates to NESO. Until a revised agreement is confirmed between NESO and the Applicant, the Applicant's position is that its current grid connection agreement is binding. The Applicant is aware that its agreement will change. However, when that agreement will change, or what it will change to, is not yet known. The agreement may change before the end of the Examination period, but it may not. The Applicant confirms that it has received notification from NESO that the Scheme has been reprioritised as a Gate 1 project. However, for clarity, the Applicant confirms that as of the date of submission of this response, the Applicant has not received that Gate 1 offer.
AM2-11	**Page 10, Section 11** 11.4 New Swaffham 400kV Substation • What is the current contractual, commercial and investment status of the proposed new National Grid 400 kV substation ("New Swaffham")? Has National Grid Electricity Transmission (NGET) confirmed that it will design, consent, fund and construct the substation, or is the Applicant still solely promoting the substation through this DCO application? • How does any Gate 1 status or delayed connection date interact with NGET's own investment decision-making for the proposed New Swaffham substation? Is there a risk that the substation will not be built if the project does not achieve a firm Gate 2 position?	In relation to this matter, the Applicant refers to its response to **NGET's Written Representation [REP1-090]**, included on pages 36-43 of **Applicant's Response to Written Representations and other Deadline 1 Submissions [REP2-028]**.
AM2-12	**Page 10, Section 11** 11.5 Deliverability Consequence • If the project is currently Gate 1, or if the connection date has slipped beyond 2033/34, how does the Applicant maintain that the scheme remains deliverable within a timeframe that supports the Critical National Priority case, and how does it justify the continued pursuit of freehold compulsory acquisition powers under Article 21 when the fundamental grid connection itself remains unconfirmed? The Examining Authority is respectfully requested to require the Applicant to provide clear, documentary evidence answering each of the questions above before the close of the Examination. In the absence of a firm Gate 2 position and a confirmed, deliverable connection date, the need and deliverability case for the scheme is materially weakened, and the justification for compulsory acquisition powers is correspondingly undermined.	In order to get to its target, which is a clean power system (this means that over 95% of the electricity generated in the UK is from clean sources, and that more electricity is generated from clean sources in the UK than is consumed from all electricity sources in the UK), the government needs projects to get connected and become operational. In Planning for New Energy Infrastructure, which was the consultation response to the new NPSs, the Government state that its capacity ranges are not designed to limit or constrain the consent of or the number of projects coming forwards, because a robust pipeline of projects is needed through to 2050. This clearly sets out the position that the scale of change needed in the energy market to maintain a hope of achieving net zero by 2050 is so significant that an unprecedented capacity of all schemes, and of all technologies, is required to come forward, and that need is not yet met. It is clear, therefore, that the need for any scheme is not affected by its Connections Reform queue position, and the need for this Scheme attracts substantial weight in the planning balance.
AM2-13	**Page 10, Section 12** 12.1 Purpose and Legal Materiality 12.1.1 This section draws the Examining Authority's (ExA) attention to the recent ministerial planning determination regarding the proposed 175-acre solar farm	The NPSs are the primary policy basis for the SoS to determine this application. Section 9.5 of the **Planning Statement [AS-076]** sets out that the CNP presumption applies to the Scheme as it demonstrates accordance with the NPSs, the mitigation hierarchy has been applied and it complies with other legal and regulatory requirements. Section 9.5 also explains the tests set out in NPS EN-1 paragraph 4.2.17 and that these are not relevant to the Scheme, and as such the presumption of CNP applies.

	near Gayton, Rothersthorpe, and Milton Malsor in Northamptonshire (The Gayton Scheme). 12.1.2 While it is acknowledged that the Gayton scheme was determined under the Town and Country Planning Act 1990 (TCPA) rather than the Planning Act 2008 DCO framework, the Secretary of State's final determination establishes a critical, contemporary precedent. It demonstrates that the general policy presumption in favour of renewable energy cannot automatically override severe localized harm to agricultural land preservation, local landscape character, and cumulative regional impacts.	Taking this into account, the Applicant has concluded within Section 9 of the **Planning Statement [AS-076]** that the adverse impacts identified are clearly outweighed by the substantial public benefits of the Scheme.
AM2-14	**Page 11, Section 12** 12.3 Formal Precedent Interrogations Put to the Applicant: In light of the Gayton ministerial overrule, the Applicant is formally requested to answer the following: • Q12.a: How does the Applicant justify the deployment of a 2,800-acre scheme in an open rural landscape given that recent ministerial decisions have blocked significantly smaller schemes (175 acres) purely on the basis of localized visual and countryside degradation? • Q12.b: In light of the Minister's explicit rejection of 'temporary solar usage' as an excuse to compromise productive agricultural land, what specific, un-mitigated agricultural baseline data can the Applicant provide to prove this site is genuinely the sequentially lowest-impact choice in West Norfolk?	The **Planning Statement [AS-076]** sets out the process taken for site selection, using the guidance set out in NPS EN-3. Paragraphs 2.10.28 to 2.10.34 of NPS EN-3 set out the preference for using non or lower grade agricultural land but accepts that land type should not be a predominating factor in site selection, that solar development is not prohibited on BMV, and that large-scale solar is likely to include some agricultural land. Appendix 1 of the **Planning Statement [AS-076]** concludes that the available land fits the factors explored by the Applicant and set out in NPS EN-3. The **Statement of Need [APP-042]** sets out the policy support for large-scale solar as part of the government's plan to decarbonise the energy system. Section 2.9 of the **Statement of Need [APP-042]** summarises the UK Solar Roadmap and explains that solar is at the heart of the government's mission to make the United Kingdom a clean energy superpower. It is one of the cheapest and quickest to build power sources in the UK and offers huge potential to boost UK energy independence, bring down bills and tackle the climate crisis. Section 3.3 of the **Statement of Need [APP-042]** confirms that NPS EN-3 commits the UK to sustained growth in solar capacity to ensure that the country is on a pathway that allows it to meet net zero emissions. As such, solar is a key part of the government's strategy to deliver low-cost decarbonisation of the energy sector and the Government has established a capacity range of 45-69GW of solar power by 2035 to support the delivery of its aims. Furthermore, paragraph 2.3.6 of NPS EN-3 sets out that the Secretary of State should ensure the relevant tests set out in Sections 5.4 and 5.10 of EN-1, which relate to biodiversity and geological conservation and landscape and visual, have been met and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure.

THE DROVES

SOLAR FARM