THE DROVES
SOLAR FARM

The Droves Solar Farm

Statement of Common Ground (SoCG) with Breckland Council (Tracked)

Prepared by: DWD
Date: October 2026
PINS reference: EN0110013
Document reference: APP/5.11.3 (Revision 3)
Infrastructure Planning (Examination Procedure) Rules 2010



Contents

1 Introduction 1
1.1 Overview 1
1.2 Parties to this Statement of Common Ground 1
1.3 Purpose of this Document 1
Terminology 1
2 The Scheme 3
2.1 Scheme Description 3
3 Record of Engagement 4
3.1 Summary of Engagement 4
4 Matters of Discussion 7
4.1 Overview 7

1 Introduction

1.1 Overview

1.1.0 This Statement of Common Ground (SoCG) has been prepared as part of the application for a Development Consent Order (DCO) (the DCO Application) for The Droves Solar Farm (the Scheme) made by The Droves Solar Farm Limited (the Applicant) to the Secretary of State for Energy Security and Net Zero (SoS) pursuant to the Planning Act 2008 (PA2008).

1.1.1 SoCGs are an established means in the DCO consenting process, of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.1.2 This SoCG has been produced to confirm to the Examining Authority (the ExA) where agreement has been reached between the parties, and where agreement has not yet been reached.

~~1.1.2~~1.1.3 This document has been updated at Deadline ~~4~~ 5 to reflect ongoing discussions. The document references have not been updated from the original submission. Please refer to the **Guide to the Application [APP/1.3.7]** for the list of current versions of documents.

1.2 Parties to this Statement of Common Ground

1.2.0 This SoCG has been prepared by the Applicant in consultation with Breckland Council (BC).

1.2.1 Collectively, the Applicant and BC are referred to as 'the parties.'

1.3 Purpose of this Document

1.3.0 This SoCG is a 'live' document and will be amended as the examination progresses, including as more information becomes available and as a result of ongoing discussions between the Applicant and Breckland Council, in order to enable a final version to be submitted to the ExA.

1.3.1 The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.

1.4 Terminology

1.4.0 This SoCG summarises the main topics covered and the status of the matter. The colour coding system used within the table in Section 4 has been outlined below.

Cell	Status
	Agreed – indicates where an issue has been resolved.
	Under Discussion – indicates where points continue to be the subject of ongoing discussions wherever possible to resolve, or refine, the extent of disagreement between the parties.
	Not Agreed – indicates a position where both parties have reached a final position that a matter cannot be agreed between them.

2 The Scheme

2.1 Scheme Description

2.1.0 The Scheme is a Nationally Significant Infrastructure Project (NSIP) for the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development comprising a Battery Energy Storage System (BESS), a Customer Substation and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50 megawatts (MW) Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.

2.1.1 The **Location Plan [APP/2.1] [APP-007]** shows the Order Limits for the Scheme, which is approximately 840 hectares (ha) of land within Norfolk (the 'Order limits').

3 Record of Engagement

3.1 Summary of Engagement

3.1.0 The parties have been engaged in consultation since 29 October 2024.

3.1.1 A non-statutory consultation took place between 17 September and 1 October 2024. The statutory consultation process took place between 21 May and 9 July 2025.

3.1.2 The Applicant and Breckland Council have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has consisted of monthly planning catch-up meetings.

3.1.3 Table 1 shows a summary of key engagement that has taken place between the Applicant and Breckland Council in relation to the Application.

Table 3.1 – Record of Engagement

Date	Form of Correspondence	Key topics discussed and key outcomes
29/10/2024	Monthly Planning Catch-Up Meeting	• Scoping stage programme. • Summary of Co:Design. • Progress update on environmental surveys.
26/11/2024	Monthly Planning Catch-Up Meeting	• The publishing of workshop summary report. • Drafting of Statement of Community Consultation. • Agricultural Land Classification grading process.
04/01/2025	Monthly Planning Catch-Up Meeting	• Preliminary Environmental Information Report (PEIR) state programme. • Statutory Consultation updates, and arrangement of site visit.
03/03/2025	Teams Meeting	• Meeting brought together skills leads and FE partners to inform the development of the Employment and Skills Strategy.

		• Stakeholders supported the approach and proposed a number of additional skills and initiatives for the final strategy.
18/03/2025	Teams Meeting	• Meeting to discuss the Applicant's tourism accommodation and assets analysis. Breckland District Council welcomed the work to date and offered suggestions for contacts and potential improvements.
29/04/2025	Monthly Planning Catch-Up Meeting	• Design update and introduction to design principles. • Percentage of best and most versatile (BMV) land use. • Introduction to the strategies underpinning the concept masterplan (placemaking, access and biodiversity). • Location and delivery of National Grid Substation.
03/06/2025	Monthly Planning Catch-Up Meeting	• Statutory Consultation updates. • Planning policy updates including the implications of PA2008 reforms and CP30.
29/07/2025	Monthly Planning Catch-Up Meeting	• Cumulative impact of solar farm applications. • Statutory Consultation summary and debrief. • Sharing that a targeted consultation will take place.
19/08/2025	Monthly Planning Catch-Up Meeting	• Presentation to set out the changes included in targeted consultation. • The Applicant set out intention to share Adequacy of Consultation Milestone with the Planning Inspectorate (PINS) and the Local planning Authorities (LPA). • Submission programme.

30/09/2025	Monthly Planning Catch-Up Meeting	• Update on progress of target consultation.
29/10/2025	Monthly Planning Catch-Up Meeting	• Update on progress of submission.
30/06/2026	Meeting to discuss SoCG BC external consultant landscape comments	• Additional viewpoints and visuals requested by the LPA • Future Baseline consideration • Cumulative scope and approach • Local Landscape Character Areas • Judgements

3.1.4 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Applicant and Breckland Council in relation to the issues addressed in this SoCG.

4 Matters of Discussion

4.1 Overview

4.1.0 The following tables detail, by topic, the matters agreed, under discussion, or not agreed between the Applicant and Breckland Council at the point of this document being published.

4.1.1 Where discussions are ongoing, the parties have included an indication of the likelihood that disagreement will remain by the end of the examination in accordance with the **Rule 6 letter [PD-006]**.

Table 1 – Cumulative Impact

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 1-1	Cumulative Effects	**Scope of Cumulative Assessment** The Council maintains its concerns about the consideration/acknowledgement of cumulative effects associated with energy infrastructure projects coming forward in Breckland and the wider Norfolk area. Whilst it is noted that the applicant's methodology for assessing cumulative effects may align with the PINS guidance, this does not change the fact that the proposal would result in notable changes to character across a wider area. Indeed, it is noted that the ExA requested an interrelationship report which was to include Norwich to Tilbury and East Pye Solar. **Landscape Assessment** The applicant has used the Breckland Landscape Character Assessment (May 2007) for their baseline assessment work. This is the Council's adopted evidence base. However, it is nearly 20 years old and, while it does make and reference of the capacity of the landscape to accommodate wind turbines, it does not make reference to the capacity of the	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. **Scope of Cumulative Assessment** **ES Chapter 6: Landscape and Visual [AS-016]** outlines the approach and the likely cumulative effects arising from the proposed Scheme in-combination with other developments. The list of cumulative schemes has been narrowed down to focus on those developments which are likely to give rise to significant cumulative landscape and visual effects; informed by the ZTV for the Scheme as well as desk based assessments and field observations. The Applicant considers it unnecessary to extend the study area to accommodate other energy infrastructure when intervisibility would diminish due to intervening vegetation and topography resulting in not significant cumulative landscape and visual effects. A further response to the consultee comments on cumulative landscape and visual effects as well as the adequacy of the Council's adopted evidence base; Breckland Landscape Character Assessment, May 2007 with supporting site observations is provided in the	Not agreed

		landscape to accommodate solar farms along with other energy infrastructure projects. Since the publication of this document a notable number of solar/energy developments have been built or have been consented, in addition to those current in the planning process/likely to come forward. In this regard, the Council requested, in its response to the second written questions, that the Examining Authority consider the energy related schemes that have been built/consented or are currently in the planning system within the vicinity of The Droves (please see attached Energy Infrastructure Projects (Swaffham and Dereham) plan). The Council would expect some further work/analysis of the landscape would be undertaken to understand the changes in the landscape since the 2007 assessment. While existing and consented schemes are considered to be part of the baseline, the landscape only has so much capacity to absorb further developments of this nature before giving rise to significant adverse effects on a wider area. As such developments of this nature, taken together with those already in existence,	supporting **Technical Information Note – Landscape and Visual [REP3-083].** It has been highlighted at previous Issue Specific Hearings and in previous responses to representations that the 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 [AS-016]**. Landscape receptors such as landscape character areas D1 Swaffham Heath and E6 North Pickenham Plateau were both considered as part of the cumulative assessment. However, the assessment concludes specifically that there is only potential for significant adverse landscape effects during the construction and operation (short and long term) stages on the E6 North Pickenham Plateau LCA. With regard to cumulative ZTVs, the ZTV studies have their limitations as a 'binary' visible or not visible model. The ZTV studies do not account for local variations in visual screening provided by woodland, hedges or individual trees or provide an indication of the extent of the development which may be visible for any particular viewpoint. The proposed Solar PV Arrays are of a lower visual profile compared to other forms of renewable development, such as wind turbines, and due to the visual containment provided by landform, hedges and woodland, the ZTVs are typically less extensive or aligned with the actual	

		cumulatively affect the character of the area. In response to the ExA's second written questions, the Council also suggested that there should be an assessment of the cumulative effects of energy infrastructure in relation to the following Breckland Landscape Character Areas: • D1 – Swaffham Heath • E6 - North Pickenham Plateau **Visual Amenity** The Council considers that there should be an assessment of any areas where the Zone of Theoretical Visibility (ZTV) studies of proposed or existing solar farms intersect with the ZTV for the application site in order to assist in the assessment of cumulative visual effects. The Council reserves its position pending consideration of the Applicant's final cumulative evidence and the Examining Authority's conclusions.	extent of visibility. For these reasons, the provision of overlapping ZTVs of the Scheme with the High Grove Solar DCO are not considered necessary to provide a greater understanding of the cumulative effects when travelling through the landscape. **Degree of certainty with regards to the Scheme** The Applicant refers to its **Response to Section 89(3) Letter dated 17 March 2026 [AS-063]** and the **Written Summary of the Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071]** (specifically Agenda Item 3.2) for a full response on the matter of uncertainty around the National Grid Substation. In summary, the DCO Application is seeking consent for, but not an obligation on NGET to deliver, the National Grid Substation in the proposed location. The fact that this location has not yet been confirmed by NGET does not prevent the Applicant from seeking development consent for it as an option. If NGET decides to locate the NGET Substation in another location, then consent can be obtained for the connection works separately. The Applicant has a grid connection offer for the Scheme requiring it to secure consent and land for the point of connection. The Applicant's approach and methodology is, therefore, sound	

		Degree of certainty with regards to the Scheme The Council also maintains the cumulative impacts cannot be assessed with any degree of certainty when there are so many unknowns - both in terms of Droves Solar (grid connection, substation location, mitigation) and High Groves Solar (DCO yet to be submitted, location of substation and grid connection details to be confirmed). The Council further considers that any change to the grid connection location or substation siting could have potential knock-on implications for the assessment of environmental effects, including landscape, heritage, and land use impacts, which have been assessed on the basis of the scheme as currently described. The Council's concern is not based on hypothetical future development, but on whether the scheme as assessed in the Environmental Statement is defined with sufficient certainty to support robust decision making under the NSIP regime. The Council considers that reliance on any future Town and Country Planning Act application to address materially different grid connection infrastructure	– consent is being sought for the National Grid Substation in a location that the Applicant considers suitable based on NGET's criteria. The potential for a National Grid Substation in this location has therefore been assessed within the Environmental Statement as it constitutes part of the Scheme, and NGET will then have the option to carry out the works should NGET determine that the proposed site for the National Grid Substation is suitable (which the Applicant expects to happen, given that the Applicant's site selection methodology is akin to NGET's site selection process). However, in the event that NGET indicates a preference for an alternative location (at whatever stage in the process), the Applicant retains the ability to seek a separate consent (with updated environmental information and assessment) for the connection to the National Grid Substation as a result. At this current time there is no information available, nor confirmation that NGET are to build a substation in any other alternative location. The Applicant therefore respectfully disagrees that there is uncertainty surrounding grid connection for the Scheme and has provided clarity on this matter in the documents referenced above. In accordance with the relevant PINS Advice Note, the Applicant has undertaken a cumulative assessment based upon the level of	

		would place an undue burden on the LPA and would risk circumvention of the comprehensive assessment intended to be undertaken through the DCO process.	information available for the High Grove Solar Farm. In the event that further information is made publicly available regarding the High Grove scheme, the Applicant will undertake a review and update the cumulative assessment where appropriate. The Applicant submitted an updated **Report on Interrelationships between Projects [REP3-084]** at Deadline 3 which sets out how the two projects have collaborated and control measures put in place within the DCO documentation. The Applicant would also note that the High Grove Solar Farm will be required to undertake a comprehensive cumulative impact assessment as part of the Environmental Impact Assessment to support their DCO Application. The Environmental Statement accompanying the High Grove DCO application will present the cumulative assessment based upon the detail set out in the Scheme's DCO Application and the detail of the High Grove Solar Farm, along with any further mitigation measures if required.	
BC 1-2	Cumulative Effects	The Council acknowledges that the Applicant's methodology appears to follow the relevant PINS guidance and notes the submission of the interrelationship report requested by the ExA and the Council.	The Applicant notes that the Council acknowledges that the methodology follows the relevant PINS guidance and the Council accepts that only one development, High Grove Solar, has the potential to result in significant cumulative effects on Landscape and Visual	Not agreed

		The Council therefore accepts the Applicant's position that only one development, High Grove Solar, has the potential to result in significant cumulative effects on Landscape and Visual within the associated Landscape and Visual Impact Assessment (LVIA) Study Area. The Council nevertheless maintains concerns regarding the wider cumulative implications of energy infrastructure development across Breckland and Norfolk. It is considered that agreement is unlikely to be reached on this issue. The Council therefore considers it a matter for the ExA to determine the adequacy of the cumulative assessment and the significance of any cumulative effects.	within the associated Landscape and Visual Impact Assessment (LVIA) Study Area. With regard to wider cumulative implications of energy infrastructure, the Applicant acknowledges that the Council wish to no longer engage and that this is their final position. As outlined above in the Applicant's response to BC 1-1, the Applicant does not consider it appropriate to consider the cumulative effects across the entire Landscape where the Scheme is not intervisible with the other developments or perceived in the same landscape character context. Sequential or in-succession views of the Scheme with other solar developments when travelling over long distances are unlikely to give rise to perceptible cumulative effects, as there would be distant separation between the other developments in the wider area.	
BC 1-3	Cumulative Development List	The Council appreciates that the applicant consulted the Council on this issue during examination, but does not consider this addresses the underlying issue in that this process should have taken place much earlier in the development of the proposals, as per the recommendation of PINS in the Scoping Opinion. The Council maintains that there is too much uncertainty surrounding both the Droves and High Grove schemes to	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. The Applicant considers that it has appropriately consulted with the LPAs and other statutory bodies. The Applicant's LVIA consultation letter dated 07 January 2025 issued to Breckland Council outlined that *"High Grove Solar Farm has been identified as a cumulative scheme which will require consideration within a cumulative assessment. As part of the Environmental Impact Assessment process, the LVIA will undertake a cumulative assessment, which will*	Not agreed

		facilitate a robust assessment of cumulative effects.	*consider both sites along with any other relevant cumulative developments identified as the assessment progresses."* In May 2025 the Applicant, as acknowledged by the Council, included a preliminary long list of cumulative developments within the PEIR (Appendix 2.4), which formed part of the Scheme's Statutory Consultation. The cumulative schemes list was reviewed and updated prior to the submission of the ES (November 2025) to ensure it was up to date and accurate, in line with the methodology set out in **ES Appendix 2.4: Cumulative Schemes [REP3-063]**. Further to this, the Applicant has committed to keep the long list and short list under review during the examination and has consulted Breckland Council during the examination period and asked Breckland Council to identify any further cumulative developments that are not already listed on the long list as set out in **ES Appendix 2.4: Cumulative Schemes [REP3-063]** The Applicant submitted an updated long and short list at Deadline 3 as part of this ongoing review. The Applicant is therefore of the view that the consultation and engagement undertaken over a period of 18 months is in accordance with the recommendation of PINS as set out in the Scoping Opinion.	

			With regards to the High Grove Solar Farm, the Council acknowledges that the Applicant's methodology appears to follow the relevant PINS guidance which acknowledges that there will be a decreasing level of detail to be available for different projects depending at what stage the project is at within the planning system. The High Grove scheme is considered to be a Tier 2 project in accordance with the relevant PINS guidance. The Applicant therefore considers that there is sufficient information available to undertake a cumulative assessment in accordance with the relevant PINS guidance.	
BC 1-4	Cumulative Effects	The Council maintains its concerns about the consideration/acknowledgement of cumulative effects associated with energy infrastructure projects coming forward in Breckland and the wider Norfolk area. Whilst it is noted that the applicant's methodology for assessing cumulative effects may align with the PINS guidance, this does not change the fact that the proposal would result in notable changes to character across a wider area. Indeed, it is noted that the ExA requested an interrelationship report which was to include Norwich to Tilbury and East Pye Solar. The Council's comments on the assessment methodology should not be	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. As discussed previously **ES Chapter 2: EIA Process and Methodology [APP-051]** sets out the methodology for considering cumulative schemes in the EIA, which aligns with the PINS Advice on Cumulative Effects Assessment (September 2024). The methodology sets out three 'tiers' of development that should be considered in the cumulative assessment, acknowledging a decreasing level of certainty as to how 'reasonably foreseeable' the developments are to come forward. Tier 3 represents the least certain developments and require a project to be registered on the PINS programme of project.	Not agreed

		taken as agreement that cumulative effects are insignificant, nor as agreement with the weight that should ultimately be given to those effects. These matters remain for the ExA. The Council therefore considers it a matter for the ExA to determine the adequacy of the cumulative assessment and the significance of any cumulative effects.	The PINS Advice on Cumulative Effects Assessment (September 2024) sets out that where other existing and, or approved developments are expected to be completed before construction of the proposed NSIP and the effects are fully determined, effects arising from them should be considered as part of the baseline and may be considered as part of both the construction and operational assessment. With regards to the comment that the proposal would result in notable changes to character across a wider area, a **Report on Interrelationships between Projects [REP3-084]** has been submitted at Deadline 3 which considered the Norwich to Tilbury, East Pye Solar and High Grove projects**.** As explained in that document, due to distance and lack of potential relationship it was considered that the interrelationship between the Scheme and both Norwich to Tilbury and East Pye Solar are limited. Judgements on significant cumulative landscape and visual effects therefore focused on High Grove and the nature of the effects are described in the **ES Chapter 6: Landscape and Visual [AS-016]** and **Landscape and Visual Technical Information Note [REP3-083].** Comments from the Council on the adequacy of the cumulative assessment methodology and judgements regarding cumulative effects remaining a matter for the ExA to determine are noted.	

BC 1-5	Cumulative Effects	Table 2.2 of the applicant's **ES Appendix 2.4: Cumulative Schemes [REP3-063]**, references the basis on which the additional developments were selected for inclusion within the cumulative assessment. For the LVIA this was based on the Zone of Theoretical Visibility of The Droves scheme in isolation and hence comes up with a 3km radius, with the only scheme falling within that radius being High Grove. The Council believes this is over simplistic and does not adequately consider the potential for cumulative effects across the wider area. GLVIA3 7.1 goes into further detail regarding the assessment of cumulative views 'in combination', 'in succession', 'frequently sequential' and 'occasionally sequential'. The Council requested further work to be undertaken in order to have a fuller understanding of the likely cumulative effects arising from similar projects with the wider area. Whilst the requested overlapping ZTV with Little Dunham has not been provided, it is noted that the applicant has assessed the cumulative effects for views in Receptor Group f (Great Palgrave and Little Palgrave) to be significant adverse.	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. The Applicant has committed to keeping the long list and short list under review during the examination and has consulted Breckland Council during the examination period and asked Breckland Council to identify any further cumulative developments that are not already listed on the long list as set out in **ES Appendix 2.4: Cumulative Schemes [REP3-063].** The Applicant submitted an updated long and short list at Deadline 3. In terms of the LVIA the list of cumulative schemes has been narrowed down to focus on those developments which are likely to give rise to significant cumulative landscape and visual effects; informed by the ZTV for the Scheme as well as desk based assessments and field observations. A further response to the consultee comments regarding cumulative landscape and visual effects is provided in the **Technical Information Note – Landscape and Visual [REP3-083]** and this note explains the reasons overlapping ZTVs of the scheme with High Grove DCO have not been considered necessary. The Applicant considers it unnecessary to extend the LVIA study area to accommodate other energy infrastructure when intervisibility	Not agreed

		Regarding the sequential effects, it is for the ExA to make an assessment as to whether the applicant's methodology is in compliance with the relevant PINS guidance. Nevertheless, this does not change the fact that the proposal would result in notable changes to character across a wider area. Indeed, it is noted that the ExA requested an interrelationship report which was to include Norwich to Tilbury and East Pye Solar. It will be for the ExA to make an assessment on cumulative effects and the Council reserves its position pending consideration of the Applicant's final cumulative evidence and the Examining Authority's conclusions.	would diminish due to intervening vegetation and topography resulting in not significant cumulative landscape and visual effects. The Applicant notes the response with regard to Visual Receptor Group f, which is assumed refers to Visual Receptor Group 4 Great Palgrave and Little Palgrave, and welcomes further discussions. **ES Chapter 6: Landscape and Visual [AS-016]** specifically states that only one receptor within this Visual Receptor Group would experience potentially significant visual effect, and these are PROW users of PROW Sparle with Palgrave BR5 noting that potential significant cumulative visual effects would be over a limited extent**.** A **Report on Interrelationships between Projects [REP3-084]** has been submitted at Deadline 3 which considered the Norwich to Tilbury, East Pye Solar and High Grove projects**.** As explained in that document, due to distance and lack of potential relationship it was considered that the interrelationship between the Scheme and both Norwich to Tilbury and East Pye Solar are limited. The Council's comments on sequential effects and the Applicant's methodology are noted.	

Table 2 – Land Use / Agriculture

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 2-1	Permanent Infrastructure	The National Grid substation is proposed to be located within Field 27 which includes Grade 2 ALC. The Council considers that permanent infrastructure should be sited on the lowest quality agricultural land within the Order Limits.	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. In respect of the siting of the National Grid Substation within Field 27, as identified this is proposed on land of Grades 2, 3a and 3b, as set out in the **ES Chapter 11: Soils and Agriculture [AS-080]** especially sections 11.8.35 to 11.8.42. The comments are noted, but siting of infrastructure is determined by a number of factors and, on the basis that much of the area will be restored, a design decision was taken by the Applicant. There is a consequential adverse impact, as described in **ES Chapter 11: Soils and Agriculture [AS-080]**. Taking a reasonable worst-case assessment, as set out in 11.8.41 *et seq,* the permanent loss or downgrading of the area would be below 20ha and therefore below the threshold for consultation with Natural England, which would in turn result in a minor adverse effect. The ES sets out details of council-level availability of agricultural land, including that of BMV quality, and sets out an assessment of the local agricultural effects, taking a long-term view and assuming cereal crop production. Since the publication of the ES, a new Predictive Agricultural Land Classification Map for England has been published. This is reported in the **Applicant's Update Note on Published Information and**	Not agreed

			Cumulative Assessment on Agricultural Land [REP1-072], submitted at Deadline 1. The information is summarised in BC 2-2 below. Avoidance of land of BMV quality on a wider basis is unlikely to be achievable in the Breckland area.	
BC 2-2	Environmental Statement and effect on food production from NSIPs across Norfolk	The Council do acknowledge that as set out ES Chapter 11: Soils and Agriculture [AS-018], the cumulative area involved with The Droves, East Pye and High Grove amounts to about 1% of farmed land in the county.	This is noted by the Applicant	Agreed
BC 2-3	Environmental Statement and cumulative effect	~~The Council now considers that the scope of the cumulative assessment needs to be amended to consider the wider impacts of renewable energy development upon agricultural land across Norfolk. In addition, strong concerns remain regarding the level of uncertainty regarding the layout of both the Droves and High Grove schemes. As such, the cumulative land loss and the resulting impact upon BMV are unknown at this stage.~~ ~~The Council accepts the Applicant's assessment of cumulative agricultural effects arising from identified NSIP schemes. However, it remains concerned that decision-makers do not currently have a full understanding of the cumulative implications of renewable~~	Four NSIP schemes were identified near the Scheme, two of which were for solar development, and these are assessed in **ES Chapter 11: Soils and Agriculture [AS-080]** and listed in Table 11-10. At the time of the ES, limited information about the ALC grading was known, but in respect of land loss (as distinct from land use) the adverse effects were considered to be limited. Cumulatively, however, there is the potential for the loss of more than 20ha of BMV as a result of these schemes and, as reported in paragraph 11.11.15, the cumulative effect is therefore recorded as significant. Please refer to the Applicant's response in Table 1, with regards to the identification of other cumulative schemes, updates to the long list as well as levels of uncertainty. The **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]** uses 2024 figures and	Not Agreed~~Under Discussion~~ ~~High~~

		~~energy development across Norfolk and Breckland. The Council therefore considers that the cumulative agricultural implications should be viewed in the context of the wider pattern of renewable energy development coming forward across the county.~~ The Council acknowledges the additional information provided by the Applicant, including the assessment of the identified NSIP schemes and the wider contextual information presented in the Update Note and Farm Impacts for Breckland Council note. The Council does not have specialist agricultural land or agricultural economics expertise and is therefore not in a position to independently verify the detailed assumptions and conclusions presented. The Council accepts that the identified NSIP solar schemes represent a relatively limited proportion of the total agricultural land within Norfolk. However, it remains concerned that percentage comparisons at county level may not fully capture the cumulative implications of the concentration of renewable energy development within Breckland, including the use of BMV land, the displacement of productive agricultural activity and the	considers a much wider potential cumulative impact from other development within the Council's area and across Norfolk, and addresses the Council's comments. The Update Note considers the cumulative effect including of other NSIP solar projects (High Grove and East Pye), other solar farms (Boultbee Solar, Palgrave Road Solar), the A47 road improvements, the Grantham to Bexwell Pipeline, and proposed housing allocations across Norfolk. The cumulative effect of The Droves, High Grove and East Pye proposals will involve 3,510 ha of agricultural land. This represents 0.840% of the total area on agricultural holdings in Norfolk. This is the land use figure. Land loss is very small. The proposed land loss due to proposed permanent development for housing or industry, from information provided with the applications or using the Predictive Map for England, over 500 ha of BMV land is predicted will be lost. The details are provided in Attachment B and mapped at Attachment C of the **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]**. Paragraph 5.5 of the **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]** notes that the Droves represents 0.8% of the total area on agricultural holdings within Breckland. High Grove involves 1,115 ha of land of BMV quality (Table 2). If this is added to the 455 ha of BMV used at The Droves, the cumulative area will be 1,570 ha of BMV land used.	

		progressive change in the nature of agricultural land use. The Council therefore maintains that the wider cumulative agricultural implications are matters for the ExA and, ultimately, the Secretary of State to consider in the planning balance.	The total amount of land within the Order limits for The Droves (839 ha) and High Grove (1,658 ha) would be 2,497 ha. This would represent 2.53% of the 98,803 ha of land on agricultural holdings in Breckland, and 0.60% of the land on agricultural holdings in Norfolk. See Tables 2 and 3 of the **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072].** The updated **ES Chapter 11: Soils and Agriculture [AS-080]** reflects these updated figures. Following ISH2 (8 September 2026), the Applicant provided, in draft, a further note entitled 'Farm Impacts for Breckland Council' (appended to this document). This provided the available statistical information on farming enterprises within Breckland District, including the cropping breakdown (where available), livestock numbers and farm staff numbers. It confirmed the uncropped arable area for Breckland and South Norfolk (19,583 ha) in 2025 as this data is not available for Breckland in isolation. That note also describes the cropping and stocking of the Site and provides data on labour hours and Gross Margins for these enterprises. The Applicant asked Breckland Council to confirm if this provided all the data they were seeking and if not, to set out what additional data or analysis was sought. Following this the Council amended this Statement of Common Ground (see adjacent column). Therefore, the Applicant is not aware of any outstanding request for information to enable the cumulative assessment locally to be made.	

			The Applicant agrees that this is a matter that will need to be considered by the ExA (and, ultimately, the Secretary of State). The **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land Quality [REP1-072]** sets out the land use change for The Droves, East Pye and High Grove represents about 0.84% of agricultural land in Norfolk **[REP1-072].** Adding the long-list and draft allocations (involving a permanent loss of over 500ha of BMV) the land areas involved amount to just under 1% (0.96%) of the agricultural land on holdings in Norfolk. The Applicant does not consider this to be significant on a county-wide basis, and notes that the land used for solar is usually capable of being farmed in combination and gives rise to land-based land management and panel maintenance work and income in addition, as well as securing income for the holdings on which the scheme is based.	
BC 2-4	Environmental Statement and impact on agriculture	~~The ES still does not provide sufficient analysis of effects on local food production, tenancy disruption, and the functioning rural economy.~~ ~~The Council acknowledges that the scheme would retain an agricultural use through grassland management and sheep grazing, and that the ALC classification of the land would not change.~~ ~~However, the Council considers that the ES does not fully assess the implications of the transition from predominantly~~	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. ~~However, the Applicant has provided the Council with a further analysis note entitled "Farm Impacts for Breckland Council" (sent to the Council on 15 September 2026) with further statistics for the District, as mentioned at the ISH2, and hopes that the Council will consider that and advise whether they require further analysis or whether they have sufficient information, so that this can be a matter for the ExA to decide upon.~~ The effects on the farm businesses on the land are considered in paragraphs 11.8.87 to 11.8.93 in **ES**	Not agreed

		~~arable production to lower-intensity grazing, particularly in terms of the productive capacity of the land, the nature and intensity of agricultural use; and the extent to which the proposed land use represents an equivalent or optimal use of agricultural land, including BMV land.~~ ~~The Council notes that the site is currently used for a range of productive agricultural activities, including arable and specialist cropping, and considers that the ES does not clearly assess the extent to which these activities would be displaced or replaced in practice.~~ ~~Accordingly, the Council considers that the effects of the scheme on agricultural land use, beyond land classification alone, require further consideratio~~ The Council acknowledges that the Applicant has provided further information on existing agricultural enterprises and the anticipated effects of the Scheme. The additional note confirms that existing arable and specialist crop production within the Site would cease, outdoor pig enterprises would relocate, and sheep grazing may continue or expand. The Council accepts that the land may remain capable of an agricultural use and that grazing would generate some agricultural activity. However, agricultural use and agricultural output are not	**Chapter 11: Soils and Agriculture [AS-080]**, having been described earlier in the baseline section 11.6. The wider effects are considered in sections 11.8.94 to 11.8.114. It is concluded that there are no food production concerns locally or nationally (and it is noted that in 2025 some 444,000ha of arable land was in funded agri-environmental uses, rather than food production). The economic implications are set out in the ES, assuming that there is no ongoing agricultural use of the site (i.e. a worst-case scenario), but sheep grazing will have labour and agricultural economy and supply chain requirements which would reduce the effect. The Agricultural Land Use in England updated by Defra 24 September 2026 records the figure of uncropped arable land up by 3.9% for 2026, with 484,398 ha of arable land being used for environmental benefit and a further 81,636 ha of bare fallow. The Council notes that the Site is currently used for a range of productive agricultural activities, including arable and specialist cropping, but considers that the ES does not clearly assess the extent to which these would be displaced or replaced in practice. **ES Chapter 11: Soils and Agriculture [AS-080]** at 11.6.24 that the land is currently farmed by: i. arable crops including cereals, oilseed rape, vining peas, potatoes, carrots, parsnips, onions (11.6.25); ii. outdoor pigs, four different groups, with two of these photographed (11.6.27);	

		synonymous. The proposed change would materially alter the nature, intensity and range of agricultural production currently undertaken, including the cessation of arable and specialist cropping within the Site. The Applicant's note provides helpful contextual information but does not enable the Council to conclude that the existing agricultural activity, output and contribution to the local rural economy would be replaced on an equivalent basis. The Council therefore maintains that the nature of this change and the weight to be given to it are matters for the ExA.	iii. sheep in winter (11.6.29) with some photographed. The ES Chapter at 11.8.87 to 11.8.93 describes the impacts. The effects are described as follows: i. arable cropping impacts are described in 11.8.89 for combinable crops, and in 11.8.92 for short-term vegetable growers. All will cease to operate these enterprises on the Site; ii. outdoor pig units will relocate to other areas outside the Site. These enterprises move every 2-3 years in any event. This is described in 11.8.88; iii. the sheep enterprises will be able to continue and expand, as described in 11.8.93. The wider implications are described in the ES at 11.8.94 through to 11.8.114, including theoretical production and economic effects. Accordingly, the implications of the transition and the extent to which they will be displaced in practice, are fully described and assessed. The Council's underlying concern seems to *be "the extent to which the proposed land use represents an equivalent or optimal use of agricultural land, including BMV land."* No policy is quoted to suggest that it is a requirement of land ownership to farm agricultural land intensively or for optimal production, whether that is BMV or otherwise.	

			There is no requirement to use land to any productive intensity. The Council refers to whether the proposed land use represents an "optional use of agricultural land, including BMV", but policy does not recognise or require any optimal use. It is noted in the ES at 11.8.100 that in June 2025 some 444,000 of arable land was in non-food producing agri-environmental uses. The benefits of the Proposed Development in respect of soils are also described in the **ES Chapter 11: Soils and Agriculture [AS-080]** at 11.8.78 to 11.8.86. The implications for the productive use of the agricultural land are assessed in ES Chapter 11, and the impacts are considered to be negligible (11.8.88 to 11.8.115 of **ES Chapter 11: Soils and Agriculture [AS-080]**. It is noted in the document entitled 'Farm Impacts for Breckland Council' appended to this document that the area of uncropped arable land within Breckland and South Norfolk (figures are not available for Breckland in isolation) in 2025 (2026 figures are not available yet) was 25 times larger than the 799 ha of agricultural land included in the proposal. The Council's final position is that the existing agricultural activity, output and contribution to the local rural economy would be replaced on an equivalent basis. The Applicant submits that is not the relevant test. The Applicant agrees that this is a matter that will need to be considered by the ExA (and, ultimately, the Secretary of State).	

BC 2-5	Local implications	The Council acknowledges the further district and county level information provided by the Applicant. However, the Council remains concerned that reliance on the proportion of the wider agricultural land resource does not fully address the site specific and localised effects of displacing the existing mix of arable, specialist cropping and livestock enterprises. The Council notes that the additional analysis relies in part on assumptions that specialist crop producers and outdoor pig enterprises would relocate their activities elsewhere. The Council does not have evidence to establish whether equivalent replacement land is available or whether displaced production would be fully replaced without effects elsewhere. The Council does not possess specialist agricultural economics expertise and is not seeking to substitute its own technical assessment for that of the Applicant. Nevertheless, it maintains its planning concern that the transition to predominantly sheep grazing would represent a material change in the nature and output of agricultural activity associated with the Site. The significance and weight of that change remain matters for the ExA and the Secretary of State.	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. However, the Applicant has provided the Council with a note entitled 'Farm Impacts for Breckland Council' appended to this document ~~[further analysis note entitled "Farm Impacts for Breckland Council" (sent to the Council on 15 September 2026) [~~with further statistics for the District, as mentioned at the ISH2~~, and hopes that the Council will consider that and advise whether they require further analysis or whether they have sufficient information, so that this can be a matter for the ExA to decide upon~~.The Applicant has considered the localised implications in regard to land use and agriculture. **ES Chapter 11: Soils and Agriculture [AS-080]** sets out an assessment of the effects, identifying national, county and district land availability and quality (Table 11-8). The cumulative assessment section (11.11) sets out an assessment at the county level. The request for a more localised analysis is noted, and the Applicant has updated **ES Chapter 11: Soils and Agriculture [AS-80]** contain this information. As noted in response BC 2-4 above, the wider implications are described in the ES at 11.8.94 through to 11.8.114, including theoretical production and economic effects. Accordingly the effects are described and assessed. There is no requirement to use land to any productive intensity. The Council refers to whether the proposed land use represents an "optional use of agricultural land, including BMV", but policy does not recognise or	Not agreed

		~~The Council acknowledges that the ES presents an assessment of food production at a regional and national scale, and that in this context the effects may be limited.~~ ~~However, the Council considers that the ES places significant reliance on strategic level analysis, and does not fully assess the site-specific and localised implications of the proposed land use change.~~ ~~In particular, the Council considers that there remains uncertainty as to the extent to which the loss of existing arable and specialist crop production would be offset by grazing activities, the implications for the ongoing operation and structure of existing farm businesses associated with the site, and the contribution of the site to the local rural economy, including agricultural output and related activity.~~ ~~The Council notes that while the land would remain in agricultural use, the proposed shift to lower intensity grazing may alter the nature, level and economic value of agricultural production associated with the site.~~ ~~Accordingly, the Council considers that the effects on food production and the rural economy at a local level are not fully evidenced and require further examination.~~	require any optimal use. It is noted in the ES at 11.8.101 that in June 2025 some 444,000 of arable land was in non-food producing agri-environmental uses. The benefits of the Proposed Development in respect of soils are also described in the ES at 11.8.79 to 11.8.87. As noted in the **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]** at 5.4 and Table 3, across Breckland and South Norfolk (Breckland data in isolation is not published), the area of uncropped arable land in 2025 was 20,353 ha, which is 11.6% of the agricultural land on holdings. There are approximately 799ha of agricultural land within the Order Limits (see Table 2 in the **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]**). The shift to lower intensity farming and non-arable farming of this area represents a small figure compared to the areas nationally and locally that are currently not farmed but are managed for agri-environmental benefits. The un-cropped arable land in Norfolk in 2025 was 25 times larger than the agricultural area for the Scheme. This will be a matter for assessment by the ExA (and ultimately the Secretary of State) balancing the implications for food production, the lack of policy and initiatives requiring agricultural land to be used for food production, the continued potential for the land to be farmed for sheep grazing and the need for land management and panel maintenance work, and the need for renewable energy.	

		~~The Council considers this issue to have a low chance of agreement being reached.~~		

Table 3 – Community Benefit

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 3-1	Public Benefit	The Council considers that there is insufficient demonstration of public benefits at district level, including limited local energy benefit and unclear Community Benefit Fund structure. The Council considers that more could and should be done in terms of public benefits at a local level.	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. There are currently no mandatory or legislative frameworks in the UK to support community benefits, but voluntary guidance does exist and has been considered by the Applicant. There are no current plans to provide subsidised energy or rebates to the local community directly as a result of the Scheme. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider scale benefits of the Scheme. The electricity generated by the Scheme would be exported to the national grid, at which point it would cease to be under the Applicant's control and would instead be dispatched and distributed by the operator in accordance with supply and demand across the network. The Scheme will make a contribution to meeting the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements (NPS) for Energy NPS EN-1 (section 4.2) and NPS EN-3. This therefore will benefit the national population rather than just the local population.	Not agreed

			The Applicant is committed to ensuring that communities benefit from the Scheme. As set out in the **Planning Statement [AS-076]**, the Applicant has committed to providing a Community Benefit Fund. Throughout the pre-application process, the Applicant has consulted on community benefits and, based on feedback and ongoing discussions, will determine how best to distribute funding. The Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). Efforts to provide specific benefits in locally impacted communities are set out in the **outline Employment, Skills and Supply Chain Strategy (oESSCS) [APP-195]** (for employment and economy), in the **outline Landscape and Ecological Management Plan (oLEMP) [REP3-069]** (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes (as secured in the **outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP-192]**), or through the Community Benefit Fund (separate to the DCO process).	
BC 3-2	Community Benefit Fund	It is considered that the applicant must ensure all stakeholders/communities are made aware of such funds and have the opportunity to make appropriate bids for the Community Benefit Fund.	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. As confirmed in the **Planning Statement [AS-076]**, the Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund	Not agreed

		A Community Benefit Fund is not considered part of the environmental information required in the ES. It is considered that the following should be provided and addressed during examination: "Commitments Register" ES appendix, providing clarification on how it will be secured, discharged and monitored; and A separate Community Benefits Statement (though not a statutory requirement).	operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). It would, therefore, be inappropriate to include the Community Benefit Fund in the **Commitments Register [APP-179]** and/or submit a separate Community Benefits Statement into the examination. In relation to Breckland Council's request for details of how the Community Benefit Fund will be governed and set up, the Applicant notes that a local foundation will likely independently determine the local initiatives to provide services to the community that are chosen to benefit from the Community Benefit Fund. The Applicant also notes that the Community Benefit Fund would be calculated based on the Scheme's generating capacity (MW per year) and delivered in line with industry standards for renewable energy projects. The Applicant will ensure that all stakeholders are made aware of the community benefit fund in place and are able to have the opportunity to input where appropriate. Index linking the fund to inflation will be considered by the Applicant.	

Table 4 – Landscape and Visual

Reference	Topic	Consultee's Position	Applicant's Position	Status

BC 4-1	Landscape Character Areas	The Applicant has reiterated their position in the July 2026 Landscape Note that they do not consider any additional landscape character work to be necessary. The Council has significant reservations regarding the LVIA relying on just the District Level Landscape Character Areas. The Council's landscape consultant considers the analysis of the site itself is quite 'thin' and does not, for instance, consider the character of the historic drove ways. The Council's adopted evidence base is The Breckland Landscape Character Assessment (May 2007), and there is no suggestion that this should not form the basis of the landscape character assessment for the scheme. It is, however, nearly 20 years old and the Council would expect some commentary on changes to the landscape over that period. A lot of energy infrastructure has been developed in since adoption, or benefits from extant consent. So, while this may be baseline, it is not described as a characteristic of the landscape in the assessment, and this has not been acknowledged within the LVIA. As a result, there are inevitably cumulative changes to the landscape, to which the proposed	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. Reference should be made to the accompanying **Technical Information Note - Landscape and Visual [REP3-083]** with regard to the landscape character assessment. The Applicant considers that the LVIA is sufficiently detailed and proportionate and in accordance with best practice guidelines. **ES Chapter 6: Landscape and Visual [AS-016]** has focussed on the published district-level landscape character assessments because they have been subject to consultation and forms part of the evidence base for the Local Plan. For the ES, the assessors outlined that the published district landscape character assessments were still relevant, noting that: GLVIA3, paragraph 5.13, states that *"Justification should be provided for any **departure from the findings of an existing established LCA."** [Applicant's emphasis]* GLVIA3, paragraph 5.15, continues 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."* [Applicant's emphasis]	Not agreed

		development would add, and these aren't being picked up. GLIVA3 notes existing assessments may need to be reviewed, interpreted and adapted (para 5.15). At para 1.3.5 of the Applicant's Landscape and Visual TIN, the Applicant states there are '*no serious limitations or flaws within the Breckland Character Assessment 2007*', the Council's Landscape Consultants disagree with this statement/position, given that the LCA does not account for any of the energy related projects which have arrived. The Council considers that further analysis of the site and the surrounding area and the consideration of Local Landscape Character Areas would be beneficial in helping to understand and record the predicted effects. Renewable energy schemes within the existing Breckland LCAs that wash over the site (such as Little Dunham and Vanguard/Boreas), should be considered, to help understand the effects on the wider area. The Council considers that the Applicant is being somewhat selective in their quoting of GLVIA3, only referencing para 5.15 when stating this work is not necessary. The following paragraph, Para 5.16, states:	For the purposes of the assessments within **ES Chapter 6: Landscape and Visual [AS-016]**, the Applicant does not consider there to be serious limitations within the Breckland Landscape Character Assessment (2007) or that further detail is required. 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 [REP3-083]** 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.	

		Even where there are useful and relevant existing Landscape Character Assessments and historic landscape characterisations, it is still likely that it will be necessary to carry out specific and more detailed surveys of the site itself and perhaps its immediate setting or surroundings. This provides the opportunity to record the specific characteristics of this more limited area, but also to analyse to what extent the site and tis immediate surroundings confirm to or are different from the wider Landscape Character Assessments that exist, and to pick up any other characteristics that may be important in considering the effects of the proposal. (author's underlining). It is considered that agreement is unlikely to be reached on this issue.		
BC 4-2	Methodology	The methodology, particularly the judgement of resulting effects, is not transparent. The Council recommends revising the methodology to remove the ambiguity in paragraph 6.2.13 and to provide clear, transparent explanations of the resulting levels of effect. The supporting text in Para 6.2.13 does not clarify which of the above levels of effect is considered Significant and states: *"An effect is likely to be assessed as Significant where the sensitivity of the Receptor combined with magnitude of*	There is no para 6.2.13 within **ES Chapter 6: Landscape and Visual [AS-016]**. The full detailed of the methodology for the LVIA is provided within Section 6.5**.** The para quoted is para 6.5.16 which clearly sets out what effects are considered significant, potentially significant or not significant in EIA terms. Para 6.5.15 notes that: "*Effects that are Major or Major-Moderate are considered significant and "likely to influence the eventual decision" whilst those that are Slight or below are judged Not Significant and "of lesser concern" (GLVIA3, para 3.35). Moderate effects are considered to be potentially significant and professional judgment is used to*	Agreed

		change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in Diagram 6.1 above) and is therefore judged more "likely to influence the eventual decision".	*determine whether the effect in question is Significant or Not Significant, with analysis provided to justify the rating."* The LVIA methodology has been applied on numerous other NSIP and TCPA applications.	
BC 4-3	Security Fence	As per the Council's response to the ExA's Second Written Questions the Council is broadly satisfied that there is enough information available at this stage to ensure future consenting will meet the landscape, visual and good design in regard to fencing.	This matter is agreed.	Agreed
BC 4-4	Representative Viewpoint Group 1: Central Site area	Representative Viewpoint Group 1: Central Site area (High-Medium Sensitivity) There is disagreement with assessing the sensitivity of people using the public footpaths across the site as High–Medium. While some parts of the route may have views that are narrowed or screened, overall the footpaths provide strong views of the surrounding countryside. Because of this, the sensitivity of these users should be considered High, not High–Medium. The Council's landscape consultant added that it's not clear to them what separates groups 1 and 2. They also consider Group 2 is high (presumably on the basis that it is crossed by Peddars Way), but also takes in a proportion of the site.	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. As explained it is understood that the comment referring to "*Representative Viewpoint Group 1";* relates to Visual Receptor Group 1. The sensitivity of Visual Receptor Groups (VRG) has been assessed using a combination of professional judgement and the methodology outlined within the **ES Chapter 6: Landscape and Visual [AS-016]**. Section 6.6 outlines that VRG 1 is of High-medium Sensitivity and includes: *"Users of PRoW within the Site such as PRoW South Acre RB1 (also shown as Petticoat Drove), South Acre RB2, South Acre RB5, and Swaffham RB1 (also shown partly as Fincham Drove). Road users along Narford Lane, River Road and stretches of the A1065. A single residential dwelling known as Keepers Cottage. Cyclists along a short section of the Rebellion Way Cycle Route.*	Not agreed

		The Council's landscape consultant still considers this is underplayed – the droveways are attractive and well used and there are framed views between the hedgerows across the wider landscape which currently contains little in the way of visual detractors. This is a matter of professional judgement. The way the Applicant's methodology is structured means there are limited scenarios in which a visual receptor might be judged to be of 'high' sensitivity. It is considered this is an issue where agreement is unlikely to be reached.	*Walkers along a short section of the Castle Acre Circular Walk."* As per the LDA methodology, High sensitivity receptors are "*Visitors to valued viewpoints or routes, which people might visit purely to experience the view, e.g. promoted or well-known viewpoints, routes from which views that form part of the special qualities of a designated landscape can be well appreciated; key designed views; panoramic viewpoints marked on maps.".* VRG 1 does not include 'valued' viewpoints, is not within a designated landscape, does not include key designed views or include panoramic viewpoints marked on a map. Therefore, VRG 1 is of High-Medium sensitivity as per Table 6-4 in **ES Chapter 6: Landscape and Visual [AS-016]**.	
BC 4-5	Operational Phase Long Term visual effect	The Council is in disagreement with reducing the Operational Phase Long Term visual effect to Moderate (and therefore not significant), as set out in Table 6.11 (page 94). Given that visual receptors will lose or experience a major reduction in their views of the original agricultural landscape, and that walkers and riders on the right of way will clearly be aware that they are passing through fields occupied by solar panels, the Operational Phase Long Term effect should remain significantly adverse. It is considered to be at least Major Moderate, not Moderate. In addition, The Council's landscape consultant welcomes the addition of two	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. The accompanying **Technical Information Note - Landscape and Visual [REP3-083]** includes more information with regard to the provision of additional viewpoints, visualisations and accompanying narrative. This expands on the nature of views across the site and measures to reduce visual channelling as referred to in BC4-8. **ES Chapter 6: Landscape and Visual [AS-016]** Table 6-11 states that for Visual Receptor Group (VRG) 1 the effects for operation medium term have been assessed to be Major-Moderate to Moderate (Significant) and Operation long term effects have been assessed to be Moderate (not Significant). The overall significance	Not agreed

		new views to Visual Receptor Groups 1, however, remains concerned about the lack of acknowledgement regarding the loss of open view across the landscape. There are several locations from which there are long views over the landscape (a characteristic of this landscape noted in the LCA). While mitigation planting is welcomed, should the scheme come forward, it does not negate the fact that these views will be lost and it is considered that this should be acknowledged. The experience of someone travelling on the droves through the site will be notably different and more contained and thus it is considered that the long term visual amenity of those travelling along the drove ways would remain significant into the long term.	lessens due to a reduction in scale of effect as a consequence of mitigation planting outlined in paragraph 6.8.146 of the **ES Chapter 6: Landscape and Visual [AS-016]** below: *"In the long term, the scale of effect would lessen as new mitigation planting and landscape management regimes provide enhanced visual screening of the Scheme, for nearby receptors. PRoW and the droves would be well screened from nearby Solar PV Arrays due to development offsets combined with the maturation of hedgerow and tree planting. New hedgerow proposed within Field 4 would be fully established and heavily filter visibility of nearby Solar PV Arrays situated near to PRoW South Acre RB2 and RB5. New hedgerow planting aligning PRoW within Field 4 would mean visibility across Field 4 is greatly reduced, when compared to the baseline view, however mitigation planting is required for screening and preventing direct short distance views of Solar PV Arrays adjacent to the nearby PRoW. Long term visual effects on the wider VRG would be, in the worst case, medium-small scale over a wide extent of the Receptor group. These effects would be medium to low magnitude, Moderate significance and Adverse. This effect is not significant."*	
BC 4-6	Landscape Character Areas	The application site straddles parts of the District Level Landscape Character Areas of D1 and E6. In the Landscape Chapter Assessment of Landscape Effects, the applicant records significant adverse effects from the Construction Phase and into the Operational Phase – Long Term, but then notes the effects on the wider	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. As stated within Section 6.8 and Table 6-11 of **ES Chapter 6: Landscape and Visual [AS-016],** the LCA is assessed on two levels to provide a greater level of detail and transparency within the assessment. The LCA is assessed on a site wide scale, i.e. effects upon the LCA within the	Not agreed

		District Character Assessment of Areas D1 and E6 are *"not significant".* The Council's landscape consultant considers that, whilst the physical changes to the landscape may stop at the boundary of the site, it does not follow that the changes to character stop, but rather are likely to reduce over distance. If the ES contained a section on Local Landscape Character Areas, it is considered this would help to provide an understanding of the site and its immediate environs and how far the effects extend beyond the site boundary. The sensitivity of the LCA has been assessed once (para 6.6.48) for both the site and the wider area. The Council contends that for the site itself the susceptibility to change should be 'high' (that is 'changes to the baseline situation are likely to arise from the type of development proposed'). It is also considered that, in the case of some receptors/receptor groups, effects are underplayed, particularly with regard to the loss of openness which characterises the area. Containing the landscape with screen	Order Limits, and also on a LCA wide scale, i.e. beyond the Order Limits. Judgement and assessment narrative associated within LCA assessments within the Site and outside of the Site are included in detail within Section 6.8 of the **ES Chapter 6: Landscape and Visual [AS-016]**. It is judged that the Scheme would potentially lead to significant adverse landscape effects upon the LCA within the Site given that this is the land being developed upon – this is reflected by the 'limited' extent of effect outlined within Table 6-11. This effect would change to not significant beyond the Order Limits when taking into account the existing landscape features and extensive proposed planting, which would greatly increase the screening effect and therefore limit the potential perceptual impacts of the Scheme upon the nearby landscape.	

		planting/new hedgerows does not address this fundamental change. The Council does not consider the site (LCA D1 – Swaffam Heath & E6 – North Pickenham Plateau) to be of 'Medium-Low' sensitivity as it applies to the site area, based on a susceptibility of 'medium' and a landscape value of 'Community'. The Council's landscape consultant contends that, based on the applicant's own methodology detailed within Table 6.1, changes to the baseline will be ***likely***, not ***may arise*** and as such the susceptibility is 'high'. In terms of value, the methodology appears to make this judgement based largely on designation. The Council is of the view that certain aspects of the landscape's character are of high value. The Council judges that the sensitivity of the landscapes within the site should be, at a minimum, 'medium'. Similarly, the nature of the anticipated change would be 'medium to high', with a resulting 'Major-Moderate' adverse effect enduring into the long term, based on the applicant's methodology.		

BC 4-7	Methodology	The Council considers that the methodology's reference to scale of effects in Scale, Extent, Duration (considerations) and Resulting Magnitude of Effect in Diagram 6.2 is not clear/considered transparent and the text within the assessment providing judgements does not clearly explain how these considerations come together to arrive at a balanced judgement. In addition, the Council considers agreement is unlikely to be reached on this point without amendments to the ES. The Council's landscape consultant does not think it is clear or transparent how the magnitude of effect has been arrived at. There is a diagram, but no explanation/definition of the resulting effects as required by GLVIA3.	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. The Applicant considers that the methodology's reference to scale of effects in Scale, Extent, Duration (considerations) and Resulting Magnitude of Effect in Diagram 6.2 is clear/considered transparent. The assessment of effects outlines the sensitivity of the receptor and then makes a judgement, using clear methodology, on magnitude of effect taking into account the scale, extent and duration of the potential effect. The magnitude and sensitivity of the receptor combine to reach a judgement on significance. This is outlined in full within **ES Chapter 6: Landscape and Visual [AS-016].**	Not agreed
B 4-8	Future Baseline	The Council's landscape consultant notes that the ES states that the recently planted hedgerows and areas of gapping up around the site's field boundaries, are considered as 'future baseline' and their anticipated growth is taken into account when considering predicted effects.	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. As outlined in the accompanying **Technical Information Note - Landscape and Visual [REP3-083]** advance planting has been undertaken by the landowner irrespective of the outcome of the DCO Application; to infill existing defunct hedges and gappy boundaries within the Site.	Not Agreed

		With regard advice on reporting on the baseline, Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (para 5.33), the recently introduced planting along field boundaries is judged to form part of the mitigation proposals, albeit coming forward in advance, and should not be included as 'future baseline', as it would not come forward in isolation of the proposals. The Council acknowledges that planting has been undertaken already, and this will mature regardless of the outcome of the application. The Council contends that it is unlikely the planting would have been undertaken in the absence of consent being sought for the proposal and, as such, should be considered as in built mitigation rather as well as future baseline. The Council's concern is the lack of acknowledgement of the loss of the open views that characterise the area and stating that these views would be contained anyway by the 'future baseline' is disingenuous. The Council agrees with the representations of Castle Acre Parish Council that 'The Landscape and Visual Assessment underestimates the magnitude of harm by treating the landscape as visually containable through screening and planting. Such mitigation does not address the	In terms of loss of views and containment by the future baseline, the accompanying **Technical Information Note - Landscape and Visual [REP3-083]** acknowledges that there are variations in the extent of views and openness across the Site and Study Area; though views are typically across the immediately adjoining fields through hedge gaps and field gate openings, with others more enclosed limited by local landform, hedges and woodland. In addition, there is recognition that views towards the treed skylines and distant horizons would not be altogether lost and that measures have been taken through the setting of minimum offsets and buffers from existing landscape features secured within the **Design Principles, Parameters and Commitments [APP/5.8.4]** to reduce the visual channelling of PRoWs.	

		fundamental and permanent loss of openness, historic legibility and time depth..' It is considered that this is an issue where agreement is unlikely to be reached.		
B 4-9	Visual Amenity	It is felt that the loss of openness and long views is not fully acknowledged. One of the characteristics of this large, open landscape is the long stretches of field boundaries which are not delineated by vertical features such as hedgerows. Within the site where hedgerows do exist these have been recently 'gapped up' and where there are longer, open, stretches new hedgerow planting has recently been introduced. While this new planting would help to contain views of the solar farm in the long term, the open views, including towards the treed skylines which characterise this area, would be lost. The introduction of these hedgerows has been used to justify effects within and in the immediate vicinity of the site as reducing to 'small' in the long term. The Council contend that, given the loss of these views, this is not the case. Views along the A1065 (discussed further below) are an example. The Council disagrees with the findings of the Landscape and Visual Technical Information Note regarding the experience of those using the A1065 in light of the loss of open and panoramic views. Similarly, the council considers some of the long-term effects for the wider views have	The Applicant acknowledges that the Council no longer wish to engage on this matter and that this is their final position. The **Technical Information Note - Landscape and Visual [REP3-083]** includes more information with regard to new viewpoints within the Order Limits and wider study area, additional visualisations and accompanying narrative. This includes a further discussion on the experience of users of the A1065 and the representative viewpoint example cited of viewpoint 8 from South Acre Road and Peddar's Way and Norfolk Coastal Path presented as a photomontage and referred to in **ES Figure 6.14 PM8, PM12 and PM 14 Winter Photomontages – Illustrative Scheme (Part A) [REP3-058].**	Not agreed

		been underestimated. An example is Viewpoint 8, which has been chosen for a photomontage. On reviewing the applicant's Year 1 and Year 15 images, the Council does not accept that the effect would reduce from 'medium-small' to 'small' in the long term, but rather, considers any screening provided by mitigation planting to be minimal.		
B 4-10	Sufficiency of Detail Provided	The ES notes that a number of embedded mitigation elements would be decided at the detailed design stage (para 6.7.2), including proposed buildings and infrastructure, fencing, gates, façade structures and colour. The Council considers there is currently enough detail and controls within the draft DCO for many elements of the scheme, however, concerns remain, in particular in regard to RAF Marham. The Council remains concerned that the following environmental conclusions within the ES rely upon mitigation measures which are either not yet fully defined, remain under development, or are subject to agreement with third parties: • RAF Marham mitigation measures; • Final grid connection arrangements;	The Applicant notes the Council's comments that there is enough detail and controls within the draft DCO for many elements of the scheme. ~~With regard to RAF Marham, the Applicant has updated the **Design Principles, Parameters and Commitments [APP/5.8.4]** at Deadline 4 with additional detail and clarity with regard to the PAR mitigation structures. As outlined at ISH3, the PAR mitigation structures fall within the assessed parameters considered within the **ES Chapter 6: Landscape and Visual [AS-016].**~~ ~~A review of the potential for any new likely significant effects has been undertaken. The Applicant can confirm that introduction of PAR mitigation structures within the Scheme would not introduce any new significant adverse landscape or visual effects. However, it is noted, as outlined at ISH3, that bunding would be discordant with existing Site characteristics and therefore could increase the magnitude of effects already assessed as significant. For example, landscape effects may become more pronounced, but no additional new significant adverse effects beyond those already identified would arise. The PAR mitigation, therefore, does not change the~~	Under Discussion High

		• Future cumulative mitigation measures associated with High Grove Solar Farm. At the hearings (dated 7th May 2026, 8th & 9th September 2026) much discussion was had over the necessary mitigation measures that would be required by RAF Marham to ensure there would be no interference with its radar systems. This included the possibility of the introduction of walls, or even a bund. The introduction of physical features to prevent any connection between the radar system and the solar panels (walls, fences, bunds, etc) would generate impacts. The introduction of bunding, in particular, has the potential to create notable landscape and visual impacts (both construction and long term), which would not be reversible. 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. ~~Clarity is sought with regard to the type and scale of the mitigation measures required in order that these can be fully assessed. Any required mitigation measures have the potential to result in notable effects and sufficient detail is not available to allow the Council to comment on this at the moment.~~ The Council acknowledges that the Applicant has updated the Design	~~conclusions of the planning balance in respect of landscape and visual effects.~~ The Applicant has prepared and submitted, at Deadline 5, the Landscape **Technical Information Note [APP/8.18.1],** which has re-assessed the impacts including the landscape and visual impacts to receptors that would be affected by the implementation of PAR mitigation as detailed in the updated **Design Principles, Parameters, and Commitments [APP/5.8.5]**. These documents include commentary on the change in magnitude and scale of any effects that are impacted by the introduction of the PAR mitigation. Additionally, the Applicant has prepared and submitted, at Deadline 5, the **PAR Mitigation Environmental Technical Note [APP/8.32]**, which provides commentary on the impact of the introduction of the PAR mitigation, as detailed in the updated **Design Principles, Parameters, and Commitments [APP/5.8.5]**, on other environmental topics. Although the magnitude of the landscape and visual effect has increased, no additional significant effects have been identified, and none of the other environmental topics covered within the **PAR Mitigation Environmental Technical Note [APP/8.32]**, have been assessed as experiencing any change to the significant effects previously concluded. The Applicant has engaged with the Defence Infrastructure Organisation (DIO) and considers that the proposed PAR mitigation parameters and commitments, as –secured within the **Design Principles, Parameters and Commitments [APP/5.8.5],** along with the DCO requirement wording (as agreed with the DIO) which is now	

		Principles, Parameters and Commitments document at Deadline 4 to provide additional parameters for potential Precision Approach Radar mitigation. The Council also notes the Applicant's conclusion that the mitigation would not introduce any new significant adverse landscape or visual effects. However, the Council maintains that insufficient certainty remains regarding the mitigation that would ultimately be delivered. The preferred solution has not been confirmed by the Applicant and the Defence Infrastructure Organisation, and the final form, location, height, length, footprint and detailed design of any bunding, fencing or other physical structure remain uncertain. The Council further notes the Applicant's acknowledgement that bunding would be discordant with the existing characteristics of the site and could increase the magnitude of landscape effects already assessed as significant. The Council does not consider that the absence of a new category of significant effect necessarily demonstrates that the change is immaterial. An increase in the magnitude or severity of an existing significant adverse effect may remain relevant to the Examining Authority's assessment and the overall planning balance.	included within Schedule 2 of the **draft DCO [APP/3.1.5]** are adequate to avoid impacts that would affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets. The Applicant therefore considers that an assessment of potential effects does not need to be set out in the ES beyond the amendments made at Deadline 5 to the following documents: • **ES Chapter 5: The Scheme [APP/6.1.3]** • **ES Chapter 6: Landscape and Visual [APP/6.2.2]** • **ES Chapter 12: Water Resources [APP/6.4.4]** • **ES Chapter 18: Summary of Effects [APP/6.2.1]** • **ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels (Part A) [APP/6.3.2]** • **ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels (Part A) [APP/6.3.2]** • **ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4.1]**; and • **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** The Applicant therefore has agreed wording with the Ministry of Defence (MoD) for a DCO requirement in relation to PAR mitigation, which has been included in Schedule 2 of the **draft DCO [APP/3.1.5]** at Deadline 5. The Applicant therefore considers that, as this matter is dealt with via a DCO requirement, the procedure and mechanism is precise, prescriptive, well-informed, clear and enforceable.	

		The Council's concern is not that an acceptable mitigation solution is necessarily incapable of being developed. Rather, it is that the environmental acceptability of the eventual solution cannot be fully assessed while its nature and dimensions remain unresolved. Depending upon the final solution, additional or increased effects may arise in relation to landscape character, visual amenity, agricultural land, drainage, ground levels and the movement or importation of material. The Council's experience of discharging requirements for major renewable energy infrastructure at Necton demonstrates the importance of ensuring that the DCO, certified documents and design parameters are sufficiently precise and well informed at the consent stage. The post consent discharge process should not be required to determine the principle or environmental acceptability of substantial mitigation works that have not been adequately defined and assessed during the examination. Accordingly, the Council considers that the RAF Marham mitigation should either be sufficiently defined and assessed before the close of the examination or secured through a clear, prescriptive and enforceable DCO mechanism. That mechanism should establish appropriate limits on the location, height, length, footprint and form of the mitigation and require assessment of its		

		landscape, visual, drainage, agricultural and ecological implications before approval. Until the preferred mitigation solution and its principal parameters are confirmed, the Council considers that the full environmental effects of the scheme cannot be assessed with sufficient certainty. This remains a matter for the Examining Authority and, ultimately, the Secretary of State. ~~The Council is concerned that this information has emerged at a 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.~~ ~~It is considered this item will remain under discussion as the examination progresses~~.		
B 4-11	Green Infrastructure	The Council accepts that the full details of proposed planting will come forward post consent, however, considers the extent of the easements must be carefully navigated to ensure sufficient screening is provided.	The detailed design and layout of the Grid Connection Infrastructure is a detailed design matter. The Green Infrastructure Strategy Plan within the **oLEMP [REP3-069]** illustrates the principle of proposed woodland belts around the Field 27. The detailed planting design and specification for the woodland belt will be undertaken in	Agreed

			accordance with National Grid guidance to ensure the minimum clearance will be maintained between the conductors and existing/proposed planting. Outside of the clearance zones, woodland belts will be established which will screen the Customer Substation and National Grid Substation along with any existing or proposed planted underneath the conductors, which would be of similar nature to existing vegetation found beneath the existing conductors in the vicinity of the Site.	
B 4-12	Woodland Plantation	It is noted that the plantations within the site are excluded from the DCO extents. Whilst it is agreed it is unlikely that these plantations would be felled, it is considered a minor weakness that woodland being relied on for screening is outside Order Limits.	Key landscape features within the Order limits will be protected during the construction, operation and decommissioning phases of the Scheme through implementation of the **oLEMP [REP3-069]** .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 existing and proposed vegetation within the Order limits will also be managed to encourage visual screening, as outlined within the **oLEMP [REP3-069]** .Bartholomew's Hill Plantation is not located within the Order limits and is, therefore, not able to be managed via the **oLEMP [REP3-069].**	Agreed

Table 5 – Glint and Glare and Amenity

Reference	Topic	Consultee's Position	Applicant's Position	Status

BC 5-1	Site Survey	The applicant has confirmed that a site survey has not been undertaken in the preparation of the Glint and Glare Assessment. The Council considers that a site survey is necessary to ensure that the reported findings are sufficiently robust to withstand the scrutiny of examination.	The author of the **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176]** has not conducted a site walkover, but site photography produced by the applicant was reviewed in conjunction with aerial imagery to confirm visibility. This is consistent with the approach taken for other solar DCOs and is equally effective in determining the extent of existing screening.	Agreed
BC 5-2	Complaints Procedure	~~As part of the operational management plan, the officer recommends that a process for receiving, managing and responding to complaints is prepared.~~ ~~It is noted that the applicant does not consider a complaints procedure to be necessary, however, the Council disagrees in this regard and requests such a procedure is secured via the DCO in the event consent is granted.~~ ~~Whilst the Council notes the general complaints procedures contained within the oOEMP, it remains concerned that no explicit reference is made to glint and glare complaints.~~ ~~The Council considers that a dedicated mechanism for recording, investigating and resolving glint and glare complaints should be secured should consent be granted.~~ ~~This request reflects the fact that some uncertainty remains regarding the cumulative effects experienced by~~	As outlined within **Applicant's response to Deadline 3 Submissions [REP4-034] ~~[APP/8.21]~~,** the **oOEMP ~~[~~APP/7.8.54~~]~~** submitted at Deadline 2 includes general provisions relating to the receiving, managing and responding to complaints, as set out in Section 2.17. This procedure relates to all complaints, including those relating to Glint and Glare if they were to arise. The **oOEMP [APP/7.8.54~~]~~** sets out that in respect of Air Quality, the Site Management will '*Record all dust and air quality complaints'* and *'make the complaints log available to the local authority'*. The cause of the complaints will be identified, and appropriate measures will be taken to address this. The **oOEMP [APP/7.8.45~~]~~** states that as a monitoring requirement, in respect to noise and vibration: *'The complaints procedure will be managed in consultation with Breckland Council which will be reviewed annually'* and that '*Further details are to be confirmed in the detailed OEMP'.* The Applicant ~~has~~ updated the **oOEMP [APP/7.8.54]** at Deadline 4 to include commitment to a glint and glare complaints procedure being established in consultation with Breckland Council.	Agreed~~Under Discussion~~ ~~Medium~~

		~~Receptor 20 and that the applicant has committed to undertake further geometric modelling for Receptor 20 in due course. In those circumstances, the Council considers it reasonable and proportionate that a mechanism exists to investigate and respond to any substantiated complaints should unforeseen effects arise during operation.~~ The Council welcomes the update to the oOEMP to include commitment to a glint and glare complaints procedure being established in consultation with Breckland Council.	Finally, the document states that through an appointed Environment Manager *'Corrective actions [will be] taken in response to incidents, breaches of the approved detailed OEMP or complaints received from a third party.'*	
BC 5-3	Cumulative Effects	It is not considered that the following issue, raised during both the stat consultation and within the Relevant Reps (para. 4.3) has been addressed: High Groves Solar – The consultation documents assess that cumulative impacts are possible towards one dwelling receptor, which is predicted to experience residual impacts from the proposed development for both panel configurations and have visibility of High Groves Solar. It is noted that the potential for cumulative impacts will be considered by the Applicant as further details are known regarding the High Grove Solar project,	Further to the statutory consultation documents, the Applicant has assessed the cumulative glint and glare impact of the Scheme and High Grove, as set out in **ES Chapter 16: Other Environmental Matters [REP3-034]**. Paragraph 16.6.38 states that "Only one dwelling (dwelling receptor 20) is within the cumulative assessment zone and is predicted to experience an impact (categorised as low) from the Scheme. This dwelling is likely to have visibility of both sites, but cumulative impacts are unlikely as reflections will not occur at the same time and will not be visible from the same windows". The Applicant is therefore of the view that the cumulative impact has been considered and that cumulative impacts are unlikely.	Agreed

		the Applicant noting that additional mitigation may be required to reduce the level of impact. The officer notes that the Scoping Report for High Grove Solar states that solar panels may be either fixed south facing or east-west single-axis tracking. The Droves consultation report indicates that the worst-case scenario for cumulative impacts would be if the two solar farms shared the same panel technology and angles. The officer therefore considers that a further report will be required once sufficient details are known for both solar farms. The Council's Environmental Health Officer has re-iterated the point that it is not considered photographs are sufficient to assess the level of screening for a development of this scale and complexity. The Council welcomes the Applicant's commitment to undertake further geometric modelling for Receptor 20. That commitment acknowledges that cumulative effects for this receptor warrant further examination and the Council looks forward to seeing the outcome of that work.	The Applicant would also note that the High Grove Solar Farm will be required to undertake a comprehensive cumulative impact assessment as part of the Environmental Impact Assessment to support their DCO Application. The Environmental Statement accompanying the High Grove DCO application will present the cumulative assessment based upon the detail set out in the Scheme's.	
BC 5-4	Air Quality	It is outlined at point 6.23 of the Local Impact Report that air quality is not	This is agreed with the Applicant	Agreed

		considered to constrain the Proposed Development, subject to the implementation of mitigation secured through the Development Consent Order.		
BC 5-5	Noise	The Local Impact Report details that the scope of the Applicant's assessment with regards to noise is appropriate to the scale and nature of the Proposed Development.	This is agreed with the Applicant.	Agreed
BC 5-6	Noise-Cumulative	It is not considered that the following point on noise from the Relevant Reps (para. 4.12) has been addressed: The EHO notes "The Off Barn" on Sporle Rd may be subject to cumulative noise effects resulting from both The Droves Solar Farm and High Grove Solar Farm. It is predicted that under the worst-case scenario noise levels could reach 37dBA. Whilst the EHO acknowledges that this is a worst-case scenario, the worst case is likely to occur during weather conditions when residents are most likely to be enjoying outdoor areas and have windows and doors open. The applicant has indicated that they are in further consultation with High Grove Solar, however, it should be noted that High Grove Solar Farm has already committed to a lower noise level of 33dBA. As such, it is considered that the onus should be	High Grove Solar Farm development is currently in 'pre-application stage' as such, limited information regarding noise and mitigation is available. Additional mitigation has not been detailed in High Grove Solar Farm's noise and vibration assessment; however, their PEIR Chapter 11 states in Section 11.9 'The Applicant has committed to revise the design of the Proposed Development to relocate electrical infrastructure away from the ESRs predicted to experience significant effects and maintain the offsets from the non-significant ESRs. The revised layout will be assessed at ES stage.' The Applicant would also note that the High Grove Solar Farm will be required to undertake a comprehensive cumulative impact assessment as part of the Environmental Impact Assessment to support their DCO Application. The Environmental Statement accompanying the High Grove DCO application will present the cumulative assessment.	Agreed

		on Drove Solar to achieve 35dBA. It is considered vital that acceptable levels of noise effects are achieved as residents will not have the recourse of statutory nuisance provisions in the event that consent is granted. The commitments secured within the oCEMP are welcomed.	Furthermore, it is, however, noted that the Applicant is committing to collaboration with the undertakers of the High Grove Solar Farm during the detailed design stage of the Scheme, to seek to achieve cumulative noise levels that do not exceed 35dB(A) at 'The Off Barn' receptor during the operational phase (as secured in paragraph 2.5.4 of the **outline Construction Environmental Management Plan (oCEMP) [APP/7.6.54]**).	

Table 6 – Ecology and Biodiversity

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 6-1	Arboriculture	There is concern with the proposed Removal of T206 (Category A Tree). This is defined as a tree of high quality and value within the AIA with an estimated remaining life expectancy of at least 40 years. The removal of a Category A tree to facilitate the siting of solar array panels is not supported by the Council.	The Applicant can confirm that T206 will be retained and provided with the minimum offsets as per the commitments in the **Design Principles, Parameters and Commitments [APP/5.8.4]** and **oLEMP [REP3-069]**.	Agreed
BC 6-2	Arboriculture	The current alignment of access tracks and/or haul roads appears to encroach unnecessarily into the RPAs of the following tree groups: G26 – Category A group G9 – Category B group	The access track routing is not secured through the DCO Application and is shown indicatively on the illustrative layout for informative purposes only. The final access track alignment will be determined in accordance with the commitments set out in the **Design Principles, Parameters and Commitments [APP/5.8.5]~~[APP/5.8.4]~~** and **oLEMP [REP4-032]~~[REP3-069]~~**, which state that internal	~~Under Discussion~~ ~~Low~~ Agreed

		G109 – Category B group G118 – Category B group The Council notes that the details are currently indicative, however, considers it to be imperative that all crossing points should be kept to an absolute minimum.	access tracks will be offset from existing landscape features, with the exception of crossing points, by the following (minimum) distances: Hedgerows – 8m. Hedgerows – with trees – 10m. Individual trees and groups of trees – 10m. Veteran and Ancient trees – 15x width of tree stem diameter. Internal access tracks will follow the alignment of the existing agricultural tracks, where practicable, with the exception of the Droves and PRoWs.	
BC 6-3	Veteran Trees	The Biodiversity Net Gain Report identifies 37 veteran trees, but this is not reflected in the BNG Metric's User Comments and should be added for clarity. The report notes that these veterans were identified through the Arboricultural survey; however, arboriculturists use different criteria from the Environment Act, which applies a lower threshold for veteran status. An ecologist should verify the number of veteran trees on site to ensure none have been overlooked.	The Applicant notes this comment and can confirm the number of veteran trees (along with their individual references) was been added into the user comments within the updated BNG metric submitted at Deadline 1, updated to reflect the publication of the LNRS. In relation to BNG, the presence of individual veteran trees has been confirmed by Aspect Ecology in line with the definitions set out in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. Reference to the Arboricultural Impact Assessment is provided in order to allow comparison and cross-referencing of individual trees and to ensure consistency. Nonetheless, in light of the comments, further clarification and confirmation of this position has been included within the updated **Biodiversity Net Gain Assessment Report [APP/7.4.2]** with this information initially submitted at Deadline 1.	Agreed

BC 6-4	Watering	Watering should not be limited to the first year after planting. Instead, it should continue for two growing seasons, with ongoing monitoring and replacement of any failed plants. Extending the establishment period in this way will greatly improve plant survival and help ensure the intended landscape and biodiversity benefits are achieved.	The **oLEMP [REP3-069]** states in para 7.4.8 and para 7.3.57 that "*all trees and shrubs will be regularly watered in the first summer and thereafter as required to ensure successful establishment*" in relation to proposed woodland belt and copse management and also proposed hedgerow tree management. This approach would also be taken for hedgerow planting. Greater clarity on watering for two growing seasons, with ongoing monitoring and replacement of failures during that period has been included within an updated **oLEMP [REP3-069]** with this information initially submitted at Deadline 1 to capture this amendment.	Agreed
BC 6-5	Lighting	The Council's Tree and Countryside Officer considers that it is necessary to address the potential ecological impacts associated with artificial lighting within the proposed development. The introduction of inappropriate or excessive lighting could adversely affect: nocturnal and crepuscular species (including bats); Foraging and commuting corridors along hedgerows, tree belts and ditch networks; Ground-nesting birds and farmland species; Invertebrate populations;	The Applicant notes the concerns raised in regard to the need to ensure that a detailed lighting assessment is conducted in order to ensure that lighting levels are appropriate for ecological receptors. The Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion sensing lighting and be used only for security and maintenance purposes as secured in **oOEMP [APP/7.8.4]** and explained in **ES Chapter 5: The Scheme [REP1-032]**. The **Design Principles, Parameters and Commitments [REP3-026]** confirm that *"The Solar arrays will not be lit during the operational phase"*, such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very	Agreed

		General habitat connectivity across the site. A DCO Requirement securing the submission and approval of a Sensitive Lighting Strategy prior to installation is therefore recommended. It is considered that such an approach would ensure the development proceeds in a manner consistent with ecological best practice and minimises impacts upon local wildlife and habitat connectivity. The Council add that they accept that the panels will not be lit, however, concerns remain and it is considered a strategy is required for lighting associated with the Customer Substation, National Grid Substation, and within the BESS compound. All lights should conform to the Council's original specification request: *Fully shielded, directional fittings; Warm white spectrum (preferably ≤2700K); No upward light spill; Low mounting heights; PIR or motion-sensor activation rather than constant illumination, lux levels at hedgerow and tree canopy edges reduced to near baseline (≤0.5 lux where bats are present, subject to ecological advice)*	small proportion of the site. Additionally, commitments to ensure that a sensitive lighting strategy is developed as part of the detailed design to mitigate adverse impacts have been made within the **oCEMP [APP/7.6.4]** and **oOEMP [APP/7.8.4]**, as updated at Deadline 2 (as secured by Requirement 13 and 14 of the draft DCO). **ES Chapter 7: Ecology and Biodiversity [REP3-038]** has assessed impacts associated with lighting on sensitive species and habitats, as appropriate and required, and concluded no significant effects.	

BC 6-6	BNG	The Council highlights the proposed Biodiversity Net Gain figure of 10% is significantly lower than the 50% proposed as part of Statutory Consultation for Highgrove Solar Farm. As such, it is considered that more could and should be done in this regard. The Council previously requested that the Applicant quantify its assertion that the scheme would deliver biodiversity net gain significantly in excess of 10% if that benefit is to be relied upon as a material consideration during the examination. The Applicant provided an updated Statutory Biodiversity Metric to the Council on 4 September 2026 to inform discussions during the hearings. The Council's ecological adviser has now reviewed the Statutory Biodiversity Metric, completed on 4 August 2026, Version 6, together with the Biodiversity Net Gain Assessment Report, Aspect Ecology Revision 2, September 2026. An amended Statutory Biodiversity Metric was subsequently provided to the Council on 17th September 2026 following comments received from the Council's ecological advisor. ~~The applicant provided an updated BNG metric to the Council on 4th September~~	Specific consideration and assessment in relation to overall biodiversity value is set out within the **Biodiversity Net Gain Assessment Report [REP4-028] ~~[APP/7.4.2]~~**, using the government metric and associated guidance. The latest submitted government metric provides a specific anticipated BNG figure for the Scheme of 22.38% Habitat Units and 58.36% Hedgerow Units based on the Scheme information, such that this provides the appropriate level of certainty in regard to the calculated BNG figures in line with government policy. This demonstrates that the Scheme will deliver a BNG substantially in excess of 10%, and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme. Whilst no statutory requirement is currently in place in relation to DCO Schemes submitted before 2 November 2026 (i.e. including the Scheme), the identified BNG is substantially in excess of the figure of 10% required for NSIPs. The **draft DCO [APP/3.1.54]** secures the final BNG of above 10 percent through Requirement 9. The Applicant notes and welcomes the Council's confirmation that it is satisfied that the metric has been completed correctly and that the submitted information is sufficient at this stage of the examination. The post development habitats on which the BNG metric is based are set out at the Post-development Habitat Mapping (Drawing No. 6806/BNG2a-j) which is provided within the submitted **Biodiversity Net Gain Assessment Report [REP4-028]. ~~[APP/7.4.2].~~**	~~Under Discussion~~ ~~Medium~~Agreed

		~~to inform discussions during the Hearings. Whilst there was not time for the Council's ecological advisors to review in advance of the Hearings, a review has now been completed.~~ The Statutory Biodiversity Metric (September~~r~~ 2026) now identifies an anticipated onsite net gain of 22.38% for area habitats and 58.36% for linear habitats (hedgerows). The Council's ecological adviser is satisfied that the baseline assessment has been completed correctly, that veteran trees have been identified as irreplaceable habitat and retained, and that the habitats have been assigned the appropriate strategic significance. The ecological adviser supports the submitted metric and considers that the information provided is sufficient at this stage of the examination ~~The Council's ecological adviser is satisfied that the metric has been completed correctly and that the submitted information is sufficient at this stage of the examination.~~ However, the ecological adviser notes that the Council has not been provided with post development habitat plans or sufficient detail to verify whether the claimed level of net gain is fully achievable in practice~~.~~. This is	In regard to the specific feasibility noted, it is acknowledged that the enhancement of a non-priority pond to peat lake was an error, which has crept in since the previously issued metric version. This has been amended to reflect the previous position (non-priority pond in enhanced condition), albeit the BNG habitat unit result remains unchanged at 22.38%, as confirmed at the latest submitted **Biodiversity Net Gain Assessment Report [REP4-028]**. In relation to the proposed woodland enhancement, those woodlands identified for enhancement within the metric have been specifically directed by the existing condition recorded and ability to address relevant condition criteria within the relevant timeframe. Accordingly, only w36a and w22a have been identified for proposed good condition, with other woodlands identified as moderate condition or no enhancement at all in order to reflect the achievability of enhancement within the specified timescales. Requirement (9) within the **draft DCO [APP/3.1.54]**, for the submission and approval of a biodiversity net gain strategy prior to commencement, addresses the need to ensure the further matters raised are addressed at that time. In particular, this requirement therefore addresses the Council's consideration that "*practical delivery of the calculated gains must be secured and verified through a Biodiversity Net Gain Plan submitted and approved before commencement".* Requirement 9(1) clearly states that *"No part of the authorised development may commence until a*	

		particularly relevant to the proposed grassland beneath the solar panels, where shading may limit floristic diversity and the habitat condition that can be achieved. The ecological adviser also notes that the metric continues to show the enhancement of a non-priority habitat pond to a peat lake, notwithstanding the Applicant's confirmation that this was an error and would be corrected. The adviser considers that this should be addressed through the final Biodiversity Net Gain Plan. The advice confirms that removal of this enhancement measure would not prevent the Scheme from achieving an onsite net gain above 10%. Accordingly, the Council acknowledges that the Applicant has quantified the anticipated biodiversity net gain and accepts, on the advice of its ecological adviser, that the submitted metric provides sufficient information at this stage. However, the Council considers that the practical delivery of the calculated gains must be secured and verified through a Biodiversity Net Gain Plan submitted and approved before commencement. It is noted and welcomed that Requirement 9 of the dDCO mandates submission of a Biodiversity Net Gain Strategy prior to	*biodiversity net gain strategy for that part has been submitted to and approved by the relevant planning authority for that part in consultation with the relevant statutory nature conservation body.".* Any submitted Biodiversity Net Gain Strategy under Requirement 9 would be anticipated to include the final metric, pre-development and post-development habitat plans and a Habitat Management and Monitoring Plan (HMMP), in line with standard guidelines associated with statutory BNG requirements, whilst in any event, given that the Council would be the 'relevant planning authority', the requirement for the submitted BNG Strategy to include the final metric, pre-development and post-development habitat plans and a Habitat Management and Monitoring Plan covering habitats of ecological value. Similarly, notwithstanding details of long-term habitat management and monitoring will be set out within the detailed LEMP (secured within the **oLEMP [APP/7.11.3],** long term monitoring and detailed of remedial actions should the required habitat objectives not be met, would be similarly set out as part of any HMMP submitted for approval by the Council under Requirement 9 and is therefore secured within the **draft DCO [APP/3.1.5]**.	

		commencement of development. This should include the final metric, pre-development and post-development habitat plans, and a Habitat Management and Monitoring Plan covering habitats of ecological value. The Council also considers that long-term monitoring should be secured, including monitoring reports in years 1, 3, 5, 10, 15, 20, 25 and 30, together with appropriate remedial action or adaptive management where the approved habitat objectives are not being achieved. The necessary monitoring costs should also be secured.~~, particularly in relation to grassland habitats proposed beneath solar panels. The ecological adviser also identifies concerns regarding the feasibility of certain enhancement measures, including the proposed enhancement of a non-priority habitat pond to a peat lake, and questions whether enhancement of existing woodland to good condition within 30 years is achievable. The ecological adviser asserts that these matters should be addressed prior to commencement of development through a Biodiversity Net Gain Plan, Habitat Management and Monitoring Plan and associated monitoring~~		

		~~secured through a DCO requirement in the event consent is granted.~~ ~~Accordingly, whilst the Council acknowledges that the Applicant has now quantified the anticipated biodiversity net gain and notes the positive conclusions reached by its ecological adviser regarding the metric itself, it has not yet had the opportunity to review the supporting information which the Applicant has indicated will be submitted at Deadline 4. The Council therefore reserves its position regarding the deliverability of the claimed biodiversity net gain pending review of those documents.~~		
BC 6-7	BNG	The Council considers that the Metric should be updated to reflect the October 2025 publication of Local Nature Recovery Strategy, as noted in the BNG report. This will affect all trees recorded in the baseline and the other neutral grassland being created post-development.	As noted, the Norfolk LNRS was published in October 2025 following the initial assessment and accordingly, as noted within the submitted **Biodiversity Net Gain Assessment Report [APP/7.4.2]**, the assessment has been updated at Deadline 1 in order to reflect the publication.	Agreed
BC 6-8	Ecological Assessment	Point 7.12 of the Local Impact Report concludes that overall, subject to the conclusions of Natural England, that: the scope of the ecological assessment appears proportionate to	The Applicant agrees with this position	Agreed

		the scale and nature of the Proposed Development; and the identification of mitigation and enhancement measures is consistent with established practice for solar NSIPs.		

Table 7 – Water, Flood Risk & Drainage

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 7-1	Private Water Supplies	Keepers Cottage should be included within the water-testing regime both before and after construction, with appropriate mitigation put in place if any issues are identified.	The Applicant has included Keepers Cottage within the water-testing regime both before and after construction. **ES Chapter 12: Water Resources [APP/6.2.3]** assessed the potential effects from the Scheme on the Keepers Cottage supply as negligible, based on the potential composition of the PV Mounting and the types of metals used in Work Nos. 2 to 4. Regardless, the **oCEMP [APP/7.6.4]** has been updated at Deadline 1 to include monitoring at the supply to provide an added level of protection.	Agreed

Table 8 – Draft DCO

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 8-1	Requirement (5)	The Council notes that paragraph 1.3.1 of the Design Principles, Parameters and Commitments document states that Tables 3.1 to 3.9 are secured by	As set out in the **Applicant's Response to ExQ1 [REP1-069]** and **Applicant's response to Deadline 3 Submissions** [REP4-034][~~APP/8.2.1~~], it is common practice that only the most significant works require details	Under Discussion High

		Requirement 5. However, Requirement 5 appears to apply only to Work Nos. 1, 2 and 3A and requires submitted details to accord only with Tables 3-1, 3-2 and 3-3, as applicable. The Council therefore seeks clarification as to the mechanism by which the parameters and commitments in table 3-4 (National Grid Substation), table 3-5 (pylons, overhead lines etc), table 3-6 (cabling), table 3-8 (access points - Req 5 only requires details of access points for Work Nos. 1, 2 and 3a) are secured, discharged and enforced. It is noted that tables 3-7 (construction and decommissioning compounds) and 3-9 (permissive paths) are secured via alternative draft DCO requirements. In addition, the Council considers that either Requirement 5, the Design Principles, Parameters and Commitments document, or another appropriate DCO mechanism should be amended or clarified to ensure consistency between the certified document and the operative requirements of the DCO. Additionally, details of the proposed bund parameters would be helpful (max length, width, height).	to be submitted and approved by the relevant planning authority – the Applicant refers to the corresponding requirement in the Longfield Solar Park Order 2023, the Cottam Solar Project Order 2024, the West Burton Solar Project Order 2025 and the Tillbridge Solar Order 2025 for examples of this approach being accepted. Further, the Applicant notes that some of the works, including in relation to landscaping, fencing and drainage, are already addressed by corresponding Requirements in Schedule 2 of the **draft DCO [APP/3.1.54]** (see Requirements 7, 10 and 11 respectively), meaning there is no need to duplicate the provisions by referring to Requirement 5 in this regard. The Applicant also notes that the **Design Principles, Parameters and Commitments [APP/5.8.54]** contain details for all Work Nos., and the **oCEMP [APP/7.6.54]**, the **oOEMP ~~[APP/7.8.4]~~ [APP/7.8.5] and the oDS [REP3-067]** all reference these parameters which must be met by the Applicant and its contractors. For the reasons set out above, the Applicant does not propose to alter the drafting (which would mean departing from well-precedented wording) of the **draft DCO [APP/3.1.54]** in this regard~~, nor does it currently consider that the **Design Principles, Parameters and Commitments [APP/5.8.4]** require any further updates at this time~~. The mechanisms in the **draft DCO [APP/3.1.54]** provide precedented and clear procedures under which the relevant detailed design matters are secured and approved at the appropriate stage.	

		Additionally, the Council welcomes details of the proposed bund parameters being included within the updated Design Principles, Parameters and Commitments document.	In relation to Breckland Council's comment regarding bund parameters, the Applicant has agreed wording with the Ministry of Defence (MoD) for a DCO requirement in relation to PAR mitigation, which has been included in Schedule 2 of the **draft DCO [APP/3.1.5]** at Deadline 5.~~Applicant remains in helpful discussions with the Ministry of Defence (MOD) regarding potential mitigation solutions for the impact on Precision Approach Radar~~. ~~At Deadline 4, the Applicant has~~The Applicant has also made further updates ~~updated~~ to the **Design Principles, Parameters and Commitments [APP/5.8.54]** at Deadline 5 in respect of this mitigation.	
BC 8-2	Requirement (7)	In relation to the discharge of the DCO requirement (7) for the Landscape and ecological management plan the draft refers to "consultation with the relevant statutory nature conservation body". The Council considers that Natural England should be specifically referenced in this instance. The Council's concern is not the ability to refer to successor organisations, but the need to ensure that appropriately qualified statutory ecological and agricultural expertise is consulted during Requirement discharge. The Council therefore considers that Natural England should be expressly identified, whilst allowing reference to any successor body where relevant.	The Applicant considers that the wider-ranging drafting of "the relevant statutory nature conservation body" is more appropriate to ensure appropriate consultation, rather than specifically referring to Natural England. This is to address the potential scenario of Natural England ceasing to exist or having its functions devolved. The Applicant also refers to the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [REP4-035]**~~**[APP/8.22]**~~ where this matter was discussed in front of the ExA. The Applicant accepts that the parties will 'agree to disagree' on this matter.	~~Under Discussion~~ ~~High~~Not agreed

BC 8-3	Requirement (8)	In relation to the discharge of the DCO requirement (8) for the Operational traffic management plan the draft refers only to submission and approval by the local planning authority. The Council considers that consultation with Norfolk County Council Local Highway Authority and National Highways should be specifically referenced in this instance.	The Applicant will update Requirement 8 of Schedule 2 of the **draft DCO [APP/3.1.4]** to ensure that before approving the operational traffic management plan, the relevant planning authority must consult with the relevant highway authority.	Agreed
BC 8-4	Requirement (9)	In relation to the discharge of the DCO requirement (9) for the Biodiversity net gain strategy the draft refers to "consultation with the relevant statutory nature conservation body". The Council considers that Natural England should be specifically referenced in this instance. The Council's concern is not the ability to refer to successor organisations, but the need to ensure that appropriately qualified statutory ecological and agricultural expertise is consulted during Requirement discharge. The Council therefore considers that Natural England should be expressly identified, whilst allowing reference to any successor body where relevant.	The Applicant considers that the wider-ranging drafting of "the relevant statutory nature conservation body" is more appropriate to ensure appropriate consultation, rather than specifically referring to Natural England. This is to address the potential scenario of Natural England ceasing to exist or having its functions devolved. The Applicant also refers to the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3** [REP4-035] ~~[APP/8.22]~~ where this matter was discussed in front of the ExA. The Applicant accepts that the parties will 'agree to disagree' on this matter.	~~Under Discussion~~ ~~High~~Not agreed
BC 8-5	Requirement (11)	In relation to the discharge of the DCO requirement (11) for the Surface and foul water drainage the draft refers to "the Environment Agency and Anglian Water	As set out **in the Applicant's response to Deadline 3 Submissions** [REP4-034] ~~[APP/8.2.1]~~**,** Requirement 11 of Schedule 2 of the **draft DCO [APP/3.1.54]** requires the Applicant to submit "*to the relevant planning authority*"	~~Under Discussion~~ ~~High~~Not agreed

		Services Limited or its successor in function as the relevant water undertaker". The Council considers that Norfolk County Council in its role as the Lead Local Flood Authority should also be specifically referenced in this instance.	the written details of the surface water drainage scheme and (if any) foul water drainage system. As part of this approval, the relevant planning authority must consult with the Environment Agency and Anglian Water Services Limited or its successor in function as the relevant water undertaker. However, the relevant planning authority is also entitled to consult with any other organisation if they deem it necessary to do so, which can include Norfolk County Council in its role as the Lead Local Flood Authority. Further, the protective provisions in Part 6 of Schedule 15 of the **draft DCO [APP/3.1.54]** require the Applicant to submit plans relating to any works proximate to any drainage work or ordinary watercourse for approval, meaning Requirement 11 of Schedule 2 does not need updating in the manner proposed by Breckland Council. This would simply duplicate an existing commitment in the **draft DCO [APP/3.1.54]**, which is unnecessary. It is therefore unnecessary for the potential for this consultation to be spelt out on the face of the **draft DCO [APP/3.1.54]**. The Applicant has, therefore, not amended the wording of Requirement 11 of Schedule 2 of the **draft DCO [APP/3.1.54]** in this regard. The Applicant accepts that the parties will 'agree to disagree' on this matter.	
BC 8-6	Requirement (12)	In relation to the discharge of the DCO requirement (12) for the programme of archaeological investigation the draft refers to submission to and approval by the relevant planning authority. The Council considers that consultation with Norfolk County Council Historic	The Applicant notes that Requirement 12 of Schedule 2 of the **draft DCO [APP/3.1.54]** requires the Applicant to submit "to the relevant planning authority" a written scheme of investigation. As part of this approval, the relevant planning authority is entitled to consult with any other organisation if they deem it necessary to do so, which can include the Norfolk County Council Historic Environment Service. It is therefore unnecessary for the	~~Under Discussion~~ ~~High~~Not agreed

		Environment Service should be specifically referenced in this instance.	potential for this consultation to be spelt out on the face of the **draft DCO [APP/3.1.54]**. The Applicant has, therefore, not amended the wording of Requirement 12 of Schedule 2 of the **draft DCO [APP/3.1.54]** in this regard. The Applicant accepts that the parties will 'agree to disagree' on this matter.	
BC 8-7	Requirement (15)	In relation to the discharge of the DCO requirement (15) for the Construction traffic management plan the draft refers only to consultation with the relevant highway authority. The Council considers that consultation with Norfolk County Council Local Highway Authority and National Highways should be specifically referenced in this instance.	The Applicant considers that the wider-ranging drafting of "the relevant highway authority" is more appropriate to ensure appropriate consultation, rather than specifically referring to Norfolk County Council Local Highway Authority and National Highways. The Applicant also notes that Councils are, under this Requirement, entitled to consult with any other organisation if they deem it necessary to do so.	Agreed
BC 8-8	Requirement (16)	In relation to the discharge of the DCO requirement (16) for the Public rights of way and permissive paths management plan the draft refers only to submission and approval by the local planning authority. The Council considers that consultation with Norfolk County Council Local Highway Authority should be specifically referenced in this instance.	The Applicant notes that Requirement 16 of Schedule 2 of the **draft DCO [APP/3.1.4]** already requires, at sub-paragraph (3), the relevant planning authority to consult with the relevant highway authority before approval of the public right of way of permissive path management plan. The Applicant considers that the wider-ranging drafting of "the relevant highway authority" is more appropriate to ensure appropriate consultation, rather than specifically referring to Norfolk County Council Local Highway Authority. The Applicant also notes that Councils are, under this Requirement, entitled to consult with any other organisation if they deem it necessary to do so.	Agreed
BC 8-9	Requirement (17)	In relation to the discharge of the DCO requirement (17) for the Soil management plan the draft refers to submission to and approval by the	The Applicant notes that Natural England has not requested to be named as a consultee for approval of the soil management plan under Requirement 17 of Schedule 2 of the **draft DCO [APP/3.1.54]**. The Applicant is in	~~Under Discussion~~

		relevant planning authority. The Council considers that consultation with Natural England should be specifically referenced in this instance. The Council's concern is not the ability to refer to successor organisations, but the need to ensure that appropriately qualified statutory ecological and agricultural expertise is consulted during Requirement discharge. The Council therefore considers that Natural England should be expressly identified, whilst allowing reference to any successor body where relevant.	discussions with Natural England regarding the contents of the outline soil management plan and is confident of reaching an agreed position during the course of the examination. The Applicant also notes that the request proposed by the Council is not precedented across the majority of made solar DCOs and, therefore, the Applicant does not intend to update the **draft DCO [APP/3.1.54]** in this regard. The Applicant also notes that Councils are, under this Requirement, entitled to consult with any other organisation if they deem it necessary to do so. The Applicant also refers to the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [REP4-035][APP/8.22]** where this matter was discussed in front of the ExA. The Applicant accepts that the parties will 'agree to disagree' on this matter.	~~High~~Not agreed

Table 9 – Grid Connection and Uncertainty of Development

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 9-1	Grid Connection and Uncertainty of Development	The Council has raised concerns regarding the certainty of the proposed grid connection arrangements for the scheme, as set out in the application documents, including the Grid Connection Statement. The Council notes that National Grid Electricity Transmission Plc, in its Relevant Representation, has stated that the point of connection and the	The Applicant notes NGET's **Relevant Representation [RR-036]** and directs the Council to its **Response to section 89(3) letter dated 17 March 2026 [AS-063]**, in which the Applicant provides a history of the grid connection process and related communications with NESO and NGET, confirms the actions it has taken to be compliant with the terms of its current grid connection agreement, and provides its analysis of the relationship between the planning process and the ongoing Connections Reform process.	Not agreed

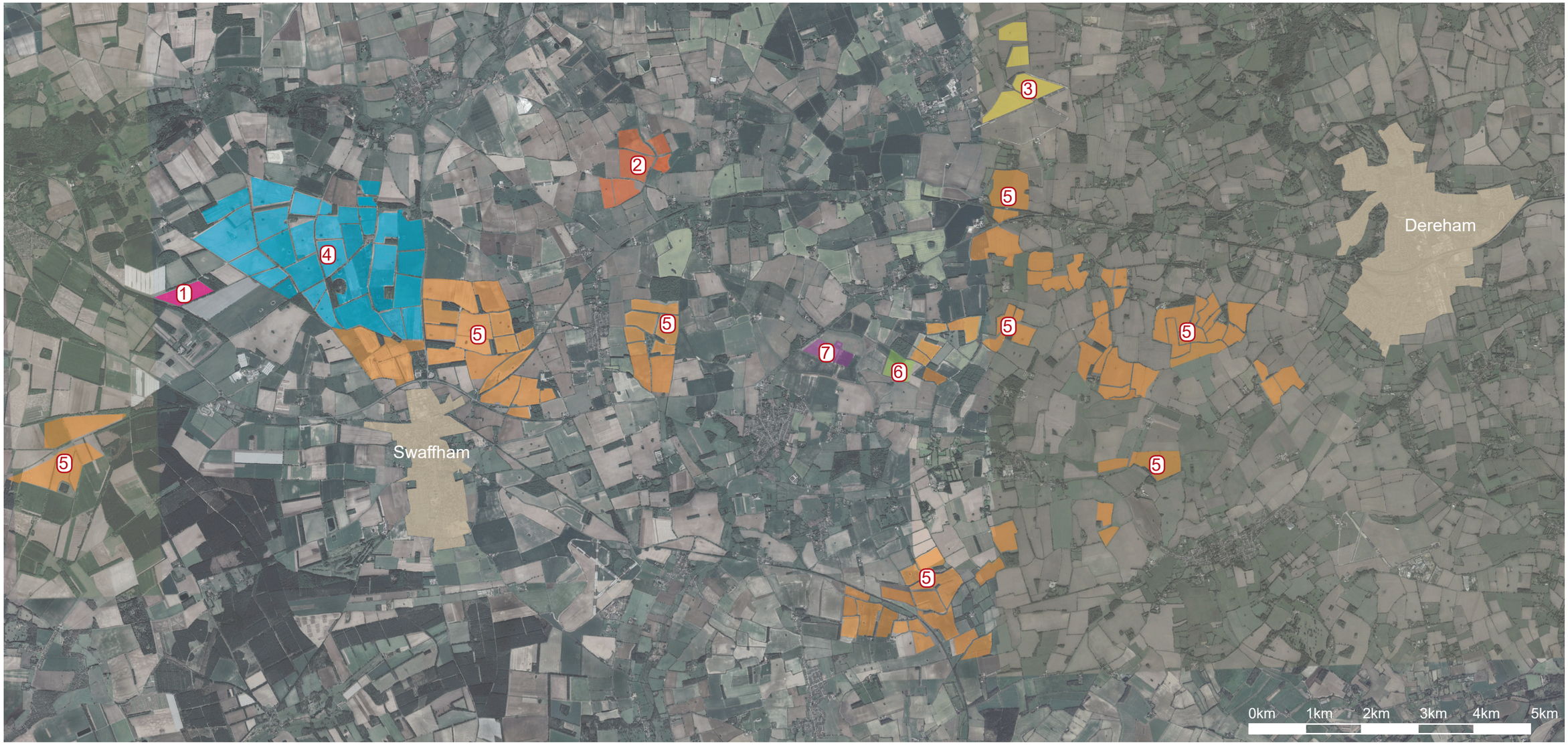
		location of any new 400 kV substation have not yet been confirmed or agreed, and that National Grid is not currently developing proposals for a new substation within the Order limits. The Council considers that this evidences a material discrepancy between the Applicant's description of the proposed grid connection infrastructure and the position of National Grid as the relevant statutory undertaker. As a result, the Council has concerns that key elements of the scheme, including the location of principal grid infrastructure, may be indicative only. The Council further considers that any change to the grid connection location or substation siting could have potential knock on implications for the assessment of environmental effects, including landscape, heritage, and land use impacts, which have been assessed on the basis of the scheme as currently described. The Council's concern is not based on hypothetical future development, but on whether the scheme as assessed in the Environmental Statement is defined with sufficient certainty to support robust decision making under the NSIP regime.	The Applicant's **Response to section 89(3) letter dated 17 March 2026 [AS-063]** also sets out the Applicant's analysis of implications for the delivery of the Scheme and demonstrates that there is precedent (and policy) for the Applicant's approach. The Applicant also directs the Council to Agenda Item 3.2 of its **Written Summary of Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071]**. The Applicant has also responded to NGET's **Written Representation [REP1-090]**, in which NGET state that "NGET does not in principle object to the Project or to the inclusion of the New Substation within the Order Limits." The Applicant's response is included from electronic page 36 to electronic page 41 of **Applicant's Response to Written Representations and other Deadline 1 Submissions [REP2-028]**. In this submission, the Applicant notes that in the event that the Scheme is consented and later secures a Gate 2 agreement, there are at present no clear plans that the Applicant is aware of which suggest that the Scheme could connect to the National Electricity Transmission System (NETS) other than through the substation it is proposing as part of the Proposed Development. This provides further support for the Scheme coming forward as proposed, i.e. including the National Grid Substation. In response to the point made around reliance on any future TCPA application, the Applicant notes that such an application may not be required and indeed the Applicant's position is that none will be required. However, the Applicant's **Response to**	

		The Council considers that reliance on any future Town and Country Planning Act application to address materially different grid connection infrastructure would place an undue burden on the LPA and would risk circumvention of the comprehensive assessment intended to be undertaken through the DCO process. The Council's concern is not whether alternative grid connection arrangements may be capable of subsequent consent, but whether the development currently before the Examining Authority has been assessed on the basis of infrastructure that will actually be delivered. The Council remains concerned that environmental effects have been assessed on the basis of a connection solution which National Grid Electricity Transmission has not confirmed it intends to deliver. Consequently, the Council remains unconvinced that the assessed development necessarily reflects the likely built development.	**section 89(3) letter dated 17 March 2026 [AS-063]** sets out relevant precedent (see in particular Botley West and Springwell sections) in the Applicant's approach. The Clean Power 2030 Action Plan explains that the Government is *"expecting an increase in planning applications with the Clean Power 2030 target"* (p55), and sets out seven measures to manage the increase at both national and local planning levels. The Applicant notes that this matter is 'not agreed' and therefore the above explanation (as has been consistently noted throughout Examination submissions) represents the Applicant's final position on this matter.	

Table 10- Heritage

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 11-1	Position on Heritage	The Council outline within their Local Impact Report that they do not have an in principle objection to the Proposed Development in relation to the historic environment.	This is noted by the Applicant.	Agreed

Appendix 1 Breckland Energy Infrastructure Projects



1. Solar Farm - Narford (Planning Approved 21.12.12)
2. JAFA Solar Farm - Little Dunham (Planning Approved 14.02.2023)
3. Solar Farm - Beeston (Planning Approved 10.08.2026)
4. The Droves Solar Farm - Swaffham (Currently undergoing DCO Examination)
5. High Grove Solar Farm (DCO forecast to be submitted October 2026)
6. Vanguard and Boreas (Under Construction)
7. Necton Substation (Under Construction)

therichardspartnership
1 Agincourt Square, Monmouth, NP25 3BT
T: +44(0)1600 772251

Project:	Title:	Revisions:	Drawn by:	Checked by:	Status	Date:	Drawing no:	Rev:
The Droves, Breckland	Energy Infrastructure Projects (Swaffham and Dereham)		JBG	PJR	Information	13/08/2026	25-23-IN-02	

Scale: NTS

Appendix 2: Farm Impacts Note

THE DROVES SOLAR FARM

EN0110013

UPDATE NOTE: FARM IMPACTS FOR BRECKLAND COUNCIL

September 2026

1 INTRODUCTION

1.1 In the draft Statement of Common Ground (SoCG) with Breckland Council, and as discussed at the Issue Specific Hearing 2 (ISH2) on 8th September, the Council is concerned that the effects on farming at a local level have not been fully evidenced and require further examination.

1.2 This notes sets out the facts and provides a more detailed assessment of the impacts and effects. Three local levels are assumed:

(i) within the boundaries of the Site;

(ii) within the District;

(iii) within the County.

1.3 Reference is made to:

(i) ES Chapter 11 **[AS-080];**

(ii) Update Note on Published Information and Cumulative Assessment of Agricultural Land Quality **[REP1-072]** (the 'Update Note').

2 BACKGROUND DATA: THE SITE

2.1 Farming of the Site is described in the ES Chapter 11. Currently it includes:

(i) arable crops including cereals, oilseed rape, vining peas, potatoes, carrots, parsnips and onions (11.6.25);

(ii) outdoor breeding pigs (11.6.27);

(iii) sheep grazing in winter (11.6.29).

3 BACKGROUND DATA: BRECKLAND

3.1 Statistics are published by Defra for Breckland and some data sets combine Breckland and South Norfolk (Defra, Structure of the Agricultural Industry for England, September 2025). The statistics published are fairly limited in respect of crop breakdowns at this local level.

3.2 In terms of key facts, they are as set out in Table 1.

Table 1: Defra June Census Data, Breckland District, 2025

Item	Statistic
Total no of holdings	771
Total area on holdings	98,803 ha
Total area of cereals	34,478 ha
Total area other arable crops	17,065 ha
Cattle and calves	11,000
Sheep and lambs	42,900
Pigs	292,000
Poultry	6,679,000
Farmers and Directors full-time	634
Workers full-time	643
Total labour	2,442

3.3 The area of uncropped arable land in Breckland and South Norfolk (with a combined arable agricultural area of 171,265 ha) in 2025 was 19,583 ha.

4 BACKGROUND DATA: NORFOLK

4.1 In terms of available statistics, at a County level there is a more comprehensive breakdown available. The key statistics are set out in Table 2. Please note that there are slight differences with the figures used in the Update Note [**REP1-072**] as 2025 figures are used below and 2024 figures were used previously based on what was available at the time.

Table 2: Defra June Census Data 2025, Norfolk

Item	Statistic	%
Total area on holdings	405,741 ha	100
Total area of cereals	116,368 ha	28
Other arable crops	87,992 ha	10
Uncropped arable land	45,138 ha	11
Cattle and calves	61,900	-
Sheep and lambs	124,990	-
Pigs	643,700	-
Poultry	15.57 million	-

5 **ASSESSMENT**

Within the Site

5.1 The potential for the production of arable crops within the Site will cease as a result of the Scheme.

5.2 In terms of effects these are described in the ES, at 11.8.87 to 11.8.93.

5.3 Arable cropping of cereals and oilseed rape within the Site will cease.

5.4 Arable cropping of potatoes, carrots, vining peas, parsnips, onions and carrots will cease within the Site. These are all crops grown by specialist contractors who farm parcels of land across much of Norfolk, so the impacts on their businesses is limited.

5.5 The areas of outdoor pigs being bred and reared on the Site will relocate to other areas. These enterprises generally move every 2 – 3 years, and will relocate to other land within the Estate.

5.6 Sheep enterprises will continue and can expand.

5.7 In terms of estimated labour, the hours per hectare comparisons for some of these crops, in terms of hours per year, are shown in Table 3. There is insufficiently-reliable estimates available for the carrots, onions, vining peas, parsnips and outdoor pig enterprises.

Table 3: Labour Estimates

Enterprise	**Standard Work Days (8 hours) Per Year**
Winter Wheat (incl straw)	1.15
Vining peas	1.07
Oilseed rape	0.96
Maincrop potatoes	3.64
Lowland sheep[1]	4.14

[1] Including grassland management

5.8 The labour input per hectare figures, whilst budget estimates, show that the labour potentially involved in managing the land under and around the Solar PV Arrays for sheep is, even on a low density, generally higher than most arable crops. Overall there is not anticipated to be a significant drop in overall land-management labour, and with other land-management and panel management work, labour is likely to exceed current agricultural levels.

5.9 In respect of economics, the Gross Margin comparisons of these crops, which is the value of sales minus those directly-related costs, is shown in Table 4.

Table 4: Gross Margin (GM) Comparison

Enterprise	**GM £/ha**
Winter Wheat	1,082
Oilseed rape	838
Maincrop potatoes	4,691
Lowland sheep	1,137

5.10 Some of the specialist crops, such as potatoes, occupy only modest parts of the land, and are grown on a rotation. They are therefore operated by contractors with specialist machinery.

5.11 There is likely to be a reduced Gross Margin from sheep grazing, compared to the current land-use cropping mix, but the impact is not expected to be significant.

5.12 Within the Site, therefore, the impacts on local agriculture will be that the current cropping and land use mix will alter significantly, to be replaced by Solar PV Arrays and the potential for sheep grazing. With sheep grazing occurring, the overall impact in terms of labour requirements and per-hectare economics, is not expected to be significant.

Within Breckland and South Norfolk

5.13 Breckland and South Norfolk collectively amount to a farmed area of 171,265 ha, with Breckland accounting for 98,802 farmable hectares. The use of 799 ha will represent 0.81% of the land farmed within Breckland District.

5.14 In respect of cropping and land-based labour, the reduction is not expected to be significant because there will continue to be agricultural activity and income. In 2025 some 19,583 ha across Breckland and South Norfolk was uncropped arable land, representing 17% of the 116,562 ha available (cereals and uncropped). Therefore in 2025 the uncropped arable land in Breckland and South Norfolk was over 24 times larger than the 799 ha of agricultural land included in this proposal.

5.15 There will not be a significant adverse effect on the land-based, agricultural economy because:

- the proportion of the District involved is less than 1%;
- agricultural economics and land-management labour are not expected to significantly alter.

5.16 There will be changes, but in the context of the changing agricultural economy locally, these will not be significant.

Within Norfolk

5.17 The 2025 Census figures for the Census recorded areas of Norwich and East Norfolk, North and West of Norfolk and Breckland and South Norfolk, as set out in the following table.

Table 5: Census Records 2025, Areas in Hectares

Crop	Breckland and South Norfolk (ha)	Norfolk (combined) (ha)
Cereals	67,462	161,168
Potatoes	2,391	11,460
Sugar beet	7,747	28,885
Field beans	2,249	4,945
Oilseed rape	6,535	13,990
Maize	7,790	15,696
Uncropped arable land	19,583	42,821#
Peas and beans	1,034	4,624
All other veg and salad	1,717	4,113
Total area on holdings	**171,265**	**405,741**
Total arable crops and uncropped	**116,562**	**284,931**

This is the 2025 figure. In the ES the (then) latest figure for 2024 was used

5.18 In the context of Norfolk the 799 ha of the Site used for a mix of crops, pig rearing and agri-environmental land uses, is not significant. In context an area over 53 times larger was in non-productive arable use in 2025. The impact will not result in a significant adverse impact on food production.

6 Conclusions

6.1 The Breckland District Council has requested a more detailed breakdown of local agricultural uses and effects, this is therefore provided.

THE DROVES
SOLAR FARM

Public