THE DROVES
SOLAR FARM

The Droves Solar Farm

Applicant's Responses to ISH2 and ISH3 Action Points

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1 Introduction

1.1 Purpose of this Document

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

1.1.2 At the time the Applicant finalised its Deadline 4 submission, the ExA's list of Action Points in respect of the hearings that took place during w/c 7 September 2026 had not been published on the project website. In the written summaries referred to below, the Applicant responded to the action points that it had noted during these hearings. These written summaries are:

- **Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [REP4-035];**
- **Written Summary of Applicant's Oral Submissions and Responses to Action Points at CAH1 [REP4-036]**; and
- **Written Summary of Applicant's Oral Submissions at OFH2 [REP4-037]**.

1.1.3 As confirmed within the Applicant's **Deadline 4 Cover Letter [APP/8.27]**, the Applicant has produced this document to provide a full response to all actions contained within the now-published **Action Points from Issue Specific Hearing 2 [EV6-007]** and **Action Points from Issue Specific Hearing 3 [EV7-007]**.

1.1.4 Where action points have not been directed towards the Applicant, this document does not include these for response.

1.2 Structure and Scope of the Document

1.2.1 **Section 2** of this document captures all those action points put to the Applicant and provides a tabulated response to each of these, and a position on whether these actions have been addressed or the latest on these actions into Deadline 5.

2 The Applicant's responses to the ExA's Action Points from ISH2 and ISH3

2.1 Response to Action Points from ISH2 and ISH3

Hearing	Action Point Number	Action	Applicant's Response
Issue Specific Hearing 2	3	**For Deadline 5** Agenda Item 3.1 – Regarding question 7, Requirements 3 & 5, applicant to discuss further with National Highways and to present items for requirements and protective provisions separately in the Statement of Common Ground.	The Applicant confirms that the items for requirements and protective provisions have been split out within the **Statement of Common Ground with National Highways [APP/5.17.2]** submitted at Deadline 5. The Applicant also refers to the **Applicant's Response to Deadline 4 Submissions [APP/8.28]**, where it has addressed the latest position in respect of Requirement 5 of the **draft DCO [APP/3.1.5]**, including with regard to the precedent set by the recently-consented Green Hill Solar Farm Order 2026.
	4	**Close of Examination or earlier if possible** Agenda Item 3.1 – Regarding questions 9 & 10, concerning Aviation effects, applicant to discuss wording to agree requirements for precision approach radar and glint and glare management plan with the Defence Infrastructure Organisation (DIO).	The Applicant has agreed wording with the DIO for DCO requirements in relation to Precision Approach Radar (PAR) mitigation and a glint & glare management plan, both of which have been included in Schedule 2 of the **draft DCO [APP/3.1.5]** at Deadline 5.
	6	**For Deadline 5** Agenda Item 3.1 – Regarding Schedule 15, applicant to have further discussions with National Highways and National Grid Electricity Transmission plc on their outstanding concerns with protective provisions.	The Applicant continues to engage with National Highways and National Grid Electricity Transmission plc on their outstanding concerns with protective provisions. The Applicant refers to the updated **Land and Rights Negotiations Tracker [APP/4.4.4]**, submitted at Deadline 5, for the latest position. The Applicant is thankful to these parties for their continuing negotiations and will provide a further update to the ExA at Deadline 6 (and, if necessary, directly to the Secretary of State if the negotiations continue beyond the close of Examination).
	8	**For Deadline 4** Agenda Item 3.1 – applicant to respond to Sporle with Palgrave parish council regarding the wording in the outline landscape and environmental management plan.	The Applicant provided a response to this Action Point in the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [REP4-035]** at Deadline 4. There is no further action required.
	9	**For Deadline 4** Agenda Item 3.1 – applicant to respond to Castle Acre parish council (CAPC) regarding the ground reinstatement query.	The Applicant responded to this Action Point in the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [REP4-035]** at Deadline 4, confirming that a response would be made to the Interested Party's written summary on this matter submitted at Deadline 4. It is noted that the Interested Party did not make this submission at Deadline 4 and, therefore, the Applicant has not been able to respond to this at Deadline 5.
	10	**For Deadline 4** Agenda Item 3.2 – applicant to provide a drawing showing the extent of mitigation for the precision approach radar.	The Applicant submitted **RAF Marham Mitigation Areas Plan [REP4-039]** at Deadline 4. At the request of the DIO, the Applicant has submitted an updated revision of the **RAF Marham Mitigation Areas Plan [APP/8.26.1]** at Deadline 5 that the DIO provided.
	11	**Close of Examination or earlier if possible** Agenda Item 3.2 – Regarding questions 3, 4 & 5, concerning Aviation effects, applicant to discuss wording for updates required to the outline construction environmental management plan and outline operational environment management plan (oOEMP) with the DIO.	The Applicant has agreed wording with the DIO for DCO requirements in relation to all other outstanding considerations of the DIO relating to RAF Marham (including birdstrike hazard and the management of construction equipment). These requirements have been included in Schedule 2 of the **draft DCO [APP/3.1.5]** at Deadline 5.

	12	**For Deadline 5** Agenda Item 3.2 – concerning mitigation for the precision approach radar, applicant to update the parameters in the Design Principles, Parameters and Commitments document	The Applicant updated the **Design Principles, Parameters and Commitments [REP4-019]** in relation to PAR Mitigation at Deadline 4. The Applicant has further updated the **Design Principles, Parameters and Commitments [APP/5.8.5]** at Deadline 5 to amend the location of the PAR Mitigation description within the document, alongside the inclusion of further commitments not related to the PAR Mitigation.
	13	**For Deadline 5** Agenda Item 3.3 – Breckland District Council (BDC) and Borough Council of King's Lynn and West Norfolk (BCKLWN) to comment on Biodiversity Net Gain.	The Applicant notes that, in the list of action points, this is assigned to the 'Applicant'; however, the action is instead for BDC and BCKLWN. As such, no response from the Applicant is provided.
	14	**For Deadline 5** Agenda Item 3.3 – Applicant to arrange a meeting to discuss impacts to trees adjacent to highway with BDC and NCC	The Applicant met with BDC and NCC to discuss the impact to trees adjacent to the highway on 8 October 2026. Agreement on this matter has been reached and is reflected in the **Statement of Common Ground with Norfolk County Council [APP/5.12.3]** submitted at Deadline 5.
	15	**For Deadline 5** Agenda Item 3.3 – Applicant to provide references to oOEMP in response to concerns from Sporle with Palgrave parish council.	As detailed in the Applicant's response to Q16.0.1 in the **Applicant's Response to ExQ3 [APP/8.29]**, there are measures committed to in the **outline Construction Environmental Management Plan [APP/7.6.5]**, **outline Operational Environmental Management Plan [APP/7.8.5]**, **outline Drainage Strategy [REP3-067]**, **outline Landscape and Environmental Management Plan [APP/7.11.3]** and **outline Battery Safety Management Plan [REP4-026]** that manage and reduce the risk of wildfires and field fires affecting the Scheme, and occurring as a result of the Scheme.
	17	**For Deadline 4** Agenda Item 3.5 – Applicant to provide response to NCC regarding construction traffic associated with mitigation measures for precision approach radar.	The **Statement of Common Ground with Norfolk County Council [REP4-011]** was updated at Deadline 4 to note that all traffic matters are agreed and, therefore, there is no further action required.
	18	**For Deadline 5** Agenda Item 3.6 – concerning question 1 part 2, applicant to set out thresholds for the significance of effect of permanent land take as a separate item in the Statement of Common Ground with Natural England.	The **Statement of Common Ground with Natural England [APP/5.15.3]** submitted at Deadline 5 has split the thresholds for the significant effects on permanent land take into a separate item.
	19	**For Deadline 4** Agenda Item 3.6 – Applicant to comment in response to interested party's concern regarding highly productive land.	The Applicant provided a response note on this matter directly to Breckland District Council. This response note has been appended to the **Statement of Common Ground with Breckland Council [APP/5.11.3]** submitted at Deadline 5.
Issue Specific Hearing 3	1	Agenda Item 3.1 – Regarding question 1, applicant to provide references to tree protection measures from the outline Landscape and Ecological Management Plan.	The Applicant provided a response to this Action Point in the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [REP4-035]** at Deadline 4. There is, therefore, no further action required.
	2	Agenda Item 3.1 – applicant to respond to interested party's concerns regarding High Grove solar view points.	High Grove has been considered within the cumulative landscape and visual assessment for Scheme (**ES Chapter 6: Landscape and Visual [APP/6.2.2]**). At the time of assessment, however, High Grove was at PEIR stage and sufficiently fixed design information was not available to enable the cumulative development to be represented reliably within the LVIA photowires (**ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires** and **Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-023 to AS-037]**). It was therefore not considered appropriate to visualise a scheme based on assumptions that could imply a greater degree of design certainty than existed. The assessment of potential cumulative landscape and visual effects has been informed by the available High Grove PEIR information, numerous field surveys and professional judgement, including consideration of the geographical and visual relationship between

			the two proposed schemes. This approach is consistent with the PINS guidance on Cumulative Effects Assessment, which recognises that the availability and level of detail of information will depend on the status of the other development and advises that a level of certainty, based on the information available, should be attributed to each development.
	3	Agenda Item 3.2 - applicant to update the parameters for invertor units and access track standard in the Design Principles, Parameters and Commitments document.	In response to this action, the Applicant updated the **Design Principles, Parameters and Commitments [REP4-019]** in relation to the relevant flood risk matters at Deadline 4. There is no further action required.
	4	Agenda item 3.2 – applicant to provide references to further information requested from Norfolk County Council's lead local flood authority (NCC LLFA).	**ES Chapter 12: Water Resources [APP/6.2.4]** has been updated at Deadline 5 to include and refer to the updated Pluvial Flood Modelling Report (Annex F) and minor clarification points, in line with consultation with the LLFA.
	5	Agenda item 3.2 – applicant to update the Flood Risk Assessment to address the Environment Agency's (EA) concern regarding groundwater for the underground contaminated water tanks (EA's reference - EA36).	The Applicant has updated **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** further at Deadline 5 following engagement with the Environment Agency. This update is captured in the **Statement of Common Ground with the Environment Agency [APP/5.13.3]** submitted at Deadline 5.
	6	Agenda item 3.2 – applicant to respond regarding NCC LLFA's query on water re-use on site.	The Applicant, as necessary, has responded to Norfolk County Council's Deadline 4 submission **[REP4-044]** in the **Applicant's Response to Deadline 4 Submissions [APP/8.28]**. The Applicant continues to engage with the LLFA.

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