THE DROVES
SOLAR FARM

# The Droves Solar Farm

## Applicant's Response to Deadline 5 Submissions

Prepared by: DWD
Date: October 2026
PINS reference: EN0110013
Document reference: APP/8.34 (Original)
APFP Regulation Reg 5(2)(q)
Planning Act 2008
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



# Contents

1. Introduction ..... 2
1.1. Purpose of the Document ..... 2
1.2. Structure and Scope of the Report ..... 2
2. The Applicant's responses to Host and Neighbouring Local Authorities ..... 5
3. The Applicant's responses to Prescribed Bodies ..... 12
4. The Applicant's responses to Elected Representatives ..... 15
5. The Applicant's responses to Members of the Public ..... 17

# 1. Introduction

## 1.1. Purpose of the Document

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

1.1.2. This document provides the Applicant's response to representations submitted to the Examining Authority (the ExA) at Deadline 5 of the Examination of the DCO Application.

1.1.3. A total of 14 documents were submitted at Deadline 5 by Interested Parties. All submissions were published on the Planning Inspectorate's website on 22 October 2026.

1.1.4. Where paragraphs or sections of the above submissions have not been included, this has been done where the Applicant does not have any commentary, or further commentary, to make on the text provided.

## 1.2. Structure and Scope of the Report

1.2.1. This document provides a response from the Applicant to the matters raised at Deadline 5 and is structured as follows:

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

1.2.2. **Table 1-1** provides a breakdown of the scope of this document and details where a Deadline 5 submission, if relevant, has been responded to.

## Table 1-1: Table of Deadline 5 submissions, as organised by the sections of this document

| Deadline 5 submission reference | Responded to in this document? | Reason |
|---|---|---|
| **Section 2** | | |
| **Borough Council of King's Lynn and West Norfolk (Responses to ExQ3) [REP5-080]** | No | The submission reflects ongoing discussion between BCKLWN and the Applicant. The Applicant does not have any comments to make on this submission. |
| **Castle Acre Parish Council (further submission) [REP5-081]** | Yes | The Applicant wishes to respond to points made in this submission. |
| **Sporle with Palgrave Parish Council (Comments on Deadline 4 Submissions) [REP5-082]** | Yes | The Applicant wishes to respond to points made in this submission. |
| **Norfolk County Council's Responses to the Examining Authority's written questions and requests for information (ExQ3) [REP5-083]** | Yes | The Applicant wishes to respond to points made in this submission. |
| **Borough Council of Kings Lynn and West Norfolk (Responses to Deadline 4 Submissions) [REP5-089]** | Yes | The Applicant wishes to respond to points made in this submission. |
| **Section 3** | | |
| **Anglian Water (Response to ExQ3) [REP5-084]** | No | The submission reflects matters which are covered within the final **Statement of Common Ground (SoCG) with Anglian Water [REP5-026]**. The Applicant does not have any comments to make on this submission. |
| **Ministry of Defence (Responses to the ExQ3 (if required)) [REP5-085]** | Yes | The Applicant wishes to respond to points made in this submission. |

| | | |
|---|---|---|
| **National Grid Electricity Transmission plc (Comments on the Deadline 4 submissions and any other information requested by the ExA for Deadline 5) [REP5-086]** | Yes | The Applicant wishes to respond to points made in this submission. |
| **National Highways (Comments on the Deadline 4 submissions and any other information requested by the ExA for Deadline 5) [REP5-087]** | Yes | The Applicant wishes to respond to points made in this submission. |
| **Environment Agency (Comments on Deadline 4 submissions) [REP5-088]** | No | The submission reflects matters which are discussed in the SoCG with the EA. Relevant aspects of this submission are therefore captured within the **SoCG with EA [APP/5.13.4]** submitted at Deadline 6. |
| **Section 4** | | |
| **James Wild (Comments on the ExA's schedule of changes to the draft Development Consent Order (if required)) [REP5-092]** | Yes | The Applicant wishes to respond to points made in this submission. |
| **Section 5** | | |
| **Antony Morgan (Comments on the Deadline 4 submissions and any other information requested by the ExA for Deadline 5) [REP5-090]** | Yes | The Applicant wishes to respond to points made in this submission. |
| **Mark Holmes (Comments on the Deadline 4 submissions and any other information requested by the ExA for Deadline 5) [REP5-091]** | Yes | The Applicant wishes to respond to points made in this submission. |
| **Leslie David Ormerod (Comments on the Deadline 4 submissions and any other information requested by the ExA for Deadline 5) [REP5-093]** | Yes | The Applicant wishes to respond to points made in this submission. |

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

| Reference | Comments | Applicant's Response |
|---|---|---|
| **Borough Council of Kings Lynn and West Norfolk (Responses to Deadline 4 Submissions) [REP5-089]** | | |
| BCKLWN1 | Query regarding: 5.8.4 Design Principles, Parameters and Commitments<br><br>In regard to the PAR mitigation, the Council acknowledge the 4.5m height restriction noted. There is concern however that the provision of a bund of this size on site, in particular given the extent of areas it would need to cover would be likely to have fundamentally different impacts than a fence, and we therefore request confirmation of how resultant or associated impacts would be dealt with if a bund becomes the preferred option for mitigation of the areas set out in [REP4-039]. The provision of bunds of this scale would require a considerable quantity of earth to be sourced (said to be from within the site). There is no detail of how this has been assessed from a landscape or land level perspective, in regard to how materials would be moved or in regard to any other resultant impacts on drainage and surface water. | The **Technical Information Note – Landscape and Visual [REP5-068]**, **ES Chapter 6: Landscape and Visual [REP5-046]**, **ES Appendix 6.7: Residential Visual Amenity Assessment [REP5-054]** and **ES Appendix 6.8: Amenity and Recreation Assessment [REP5-056]** were updated at Deadline 5 to consider the PAR Mitigation (as detailed in **ES Chapter 5: The Scheme [REP5-042]** and the **Design Principles, Parameters and Commitments [APP/5.8.6]**) in the assessment of landscape and visual impacts on the relevant receptors.<br><br>The updated documents detail where potential landscape and visual effects may increase as a result of the proposed PAR Mitigation.<br><br>The updated **ES Chapter 6: Landscape and Visual [REP5-046]** concludes that regarding landscape character (specifically LCA D1 and E6 within the Site), there would be an increased magnitude of impact from Medium to High-Medium. Similarly, regarding significance, the updated assessment concludes an increase from moderate (significant) to major-moderate (significant). This increase in effect is assessed to be present during construction, decommissioning, and operation across all durations. The updated assessment has introduced no new significant landscape effects upon receptors considered within the Landscape and Visual Impact Assessment (LVIA).<br><br>**ES Chapter 6: Landscape and Visual [REP5-046]** details that the updated assessment has introduced no new significant visual effects upon receptors considered within the LVIA. With regard to potential effects upon visual amenity, specifically Visual Receptor Group 1 (VRG1) in which the PAR Mitigation is partly proposed, the updated assessment concludes during operation phase:<br><br>- Over a short term duration there would be an increased magnitude of impact from High-Medium to High. Similarly, with regard to significance, the updated assessment concludes an increase from major-moderate (significant) to major (significant); and<br>- Over a medium term duration there would be an increased magnitude of impact from Medium to High-Medium. Similarly, with regard to significance, the updated assessment concludes an increase from moderate (significant) to major-moderate (significant).<br><br>The changes in magnitude listed above did not result in a change in the level of significance, therefore the planning balance set out in the **Planning Statement [APP/5.5.3]** remains the same.<br><br>The **outline Construction Environmental Management Plan (oCEMP) [REP5-062]** includes appropriate measures related to the movement and storage of soils during the construction phase, which are applicable to the construction of the PAR Mitigation and have been considered in the assessment of landscape and visual, and flood risk and drainage impacts. The specific consideration of the PAR Mitigation in the assessment of environmental effects has been provided within the **PAR Mitigation Environmental Technical Note [REP5-075]**. |
| **Norfolk County Council's Responses to the Examining Authority's written questions and requests for information (ExQ3): [REP5-083]** | | |
| NCC1 | Lifetime of development<br>ExA Q 8.0.1 | The Applicant considers a 60-year operational lifetime to be appropriate and proportionate for the Scheme. The Applicant has, therefore, calculated and assessed the full lifetime of the Scheme. |

| | | |
|---|---|---|
| | With reference to item NCC 9-2 of NCC's Statement of Common Ground [REP3-018], could the LLFA clarify how many years it considers would reflect the full development lifetime and why?<br><br>NCC response:<br><br>The full lifetime of the scheme has not been calculated. At present, the applicant states the temporary 60 year operational lifetime of the scheme has been presented. Paragraph 006 National Planning Policy Guidance for Flood Risk and Coastal Change (Published September 2025) states "The lifetime of a non residential development depends on the characteristics of that development, but a period of at least 75 years is likely to form a starting point for assessment."<br><br>The applicant has confirmed the Solar Panels will be replaced at least every 30 years, equating to at least once during the site's operation. The applicant also confirms the BESS units would be replaced roughly every 10 years, which equates to at least 5 times during the site's operational phase. The applicant then confirms the National Grid Substation being constructed to facilitate the development is permanent. The permanent National Grid Substation to facilitate the development along with the continual replacement of the temporary proposed Solar PV Arrays and the BESS units, leads the LLFA to consider whether the development is permanent. On consideration of NPPG, the characteristics of the proposed development identified by the applicant demonstrates the replaceability of key elements combined with a permanent connection to the National Grid, meaning the proposed development's operational lifetime could easily extend beyond 60 years.<br><br>In addition, the duration of the construction and decommissioning phases have not been clearly identified within either the flood risk assessment or the wider environmental impact assessment. These phases would result in additional years at the start and end of the development's lifetime. The development's lifetime is relevant to the assessment of flood risk as it impacts the assessment of future flood risk within the Environmental Impact Assessment, the Flood Risk Assessment, the Surface Water Drainage Design and the hydraulic modelling that supports the design and assessment. At present, there is not enough information from the applicant to determine the full lifetime of the proposed development. However, based "on the characteristics of that development" it would appear the development is permanent rather than temporary. Therefore, the design and associated assessments should be updated to reflect a permanent design approach. | The operational lifetime of the Scheme is 60 years, which represents the period during which the infrastructure will be operational and exposed to long-term climate change effects. This approach is entirely consistent with other solar DCO projects, such as:<br><br>• Cottam Solar Project;<br>• Gate Burton Energy Park;<br>• Mallard Pass Solar Farm;<br>• West Burton Solar Project;<br>• Tillbridge Solar Project;<br>• One Earth Solar Farm;<br>• Fosse Green Energy; and<br>• Green Hill Solar Farm.<br><br>Construction and decommissioning are temporary phases that occur either side of the operational period and are separately assessed and managed through the **oCEMP [REP5-062]** and **outline Decommissioning Strategy [REP3-067].** As such, the development lifetime has not been excluded from the assessment.<br><br>Furthermore, the climate change allowances used within **ES Appendix 12.2: Flood Risk Assessment [REP5-058]** apply the 2070s epoch allowances for peak rainfall which extends beyond the anticipated operational phase (suitable for development with a lifespan operating into 2061 – 2125) and therefore encompasses the decommissioning phase.<br><br>Similarly, the climate change allowance assessed for fluvial risk is the 2080s epoch (suitable for development with a lifespan operating into 2070-2125).<br><br>The Applicant's assessment therefore considers climate change effects over the full duration of the Scheme and adopts a precautionary appropriate to future flood risk.<br><br>The Applicant respectfully disagrees with NCC's assertion that there is insufficient information to establish the lifetime of the Scheme and, consequently, that the Scheme should be regarded in its entirety as permanent development. This conclusion does not reflect the distinction made in the application between the time-limited solar generating infrastructure and those elements of the electricity transmission infrastructure that are expressly proposed to remain in place following decommissioning.<br><br>Paragraphs 4.6.6 and 4.6.12 to 4.6.16, of the **Planning Statement [APP/5.5.3]**, establishes that the Applicant is seeking consent for an operational period of 60 years from final commissioning, followed by a decommissioning period anticipated to last 12 to 24 months. The decommissioning strategy is secured through the requirements of the draft DCO.<br><br>The Applicant is not suggesting that the description of solar infrastructure as temporary removes the need for a robust assessment of long-term effects. The surface water drainage design must remain appropriate throughout the operational and decommissioning periods. Furthermore, those elements intended to remain beyond decommissioning, including the National Grid infrastructure and any retained access tracks, drainage features or other associated works, must be assessed using an appropriately precautionary design life and corresponding climate change allowances. This approach has already informed the Applicant's responses to NCC's earlier consultation comments, including the consideration of upper-end rainfall allowances for formal drainage infrastructure and appropriate peak river flow allowances for retained National Grid infrastructure. |

| Sporle with Palgrave Parish Council (Comments on Deadline 4 Submissions) [REP5-082] | | |
|---|---|---|
| SPPC1 | Page 2, Section: 1. Traffic Accidents along the A1065<br><br>Refers to Norfolk County Council's Deadline 4 submission (REP4-044) paragraph 4.13 which relates to traffic accidents.<br><br>The PC would contend that the NCC's accident figures of 177 collisions in total over 30 years relates better to the operational life of the development, showing the average number of collisions per year is greater than that shown in the Applicant's data.<br><br>Following the last issue specific hearings, it would appear that there is largely agreement between the Applicant, Norfolk County Council and National Highways over the likely traffic figures and other traffic issues associated with this development, including the cumulative impact from High Grove and other developments likely to use the A47 and A1065. However, the PC would ask that the ExA take into account, when examining and assessing these issues, the serious concerns of local communities with regard to traffic levels and road safety, ensuring the outline traffic management plans for all phases of the development are strong enough to enable traffic to be accurately assessed and controlled without causing impediment to businesses, local residents and tourists using the road system around the development. | The Applicant makes note of the suggestion that the number of collisions viewed over the 30 year period suggests the average is higher than noted within the review of Department for Transport (DfT) STATS19 data in **ES Appendix 9.2: Traffic Assessment [APP-163]**, although it is acknowledged that the DfT database shows that annual reported road collisions have decreased over 50% since 2004, suggesting a general trend of a reduction in collisions each year over time up to the present day.<br><br>The Applicant considers that the submitted management plans that are proposed to be secured through the DCO, in the form of the **outline Construction Traffic Management Plan (oCTMP) [REP5-064]** and **outline Operational Traffic Management Plan (oOTMP) [REP3-079]**, are sufficiently robust and will ensure there are appropriate controls in place to mitigate any adverse transport effects and suitable monitoring protocols to ensure that remains the case over the lifetime of the Scheme. |
| SPPC2 | Page 3, Section: 2. Mitigation of RAF Marham PAR landing radar<br><br>It is noted that the Marham mitigation Areas Plan (REP4-039) shows Mitigation Area 3 straying across Petticoat Drove into Fields 14 and 15.<br><br>It is also noted that in the Written Summary of Applicant's Oral Submissions to Action Points (REP4-035) Appendix 1 shows a possible cross section through Mitigation Area 2 showing the likely mitigation to be employed. The PC notes that it shows a number of mitigation fences at 4.5m high and also a bund. Although not showing further fences into Field 4 on its down slope to the north east we would ask whether that would be the case in Mitigation Area 3 in Fields 14 and 15 to the east of Petticoat Drove where the land slopes downwards.<br><br>The PC's concern is that fences at the top of Fields 14 and 15 would impede the view of Petticoat Drove on the horizon from VRG4 viewpoints such as viewpoint 17 on Hungry Hill. As the landscape slopes down towards Fincham Drove the possibility of mitigating this is difficult as the solar arrays will be progressively lower in the view with the fence likely to appear above the arrays. In addition, the hedges at the bottom of Fields 14 and 15 will be less able to mitigate the impact of the view. | The inclusion of PAR Mitigation within a small area on the western edges of fields 14 and/or 15 would be barely perceptible from viewpoint 17 at Hungry Hill. Viewpoint 17 is included within **Technical Information Note – Landscape and Visual [REP5-068].** As detailed within the **Design Principles, Parameters and Commitments [APP/5.8.6],** the PAR Mitigation is restricted to 4.5m in height, the same as the height of the proposed Solar PV Array. The PAR Mitigation would therefore not noticeably protrude above the surrounding arrays when taking into account existing topography. Viewpoint 17 is approximately 1.2km to the north-east of the Site. The PAR Mitigation would be barely perceptible, given that it would form a very small part of a wider view at such a distance when sited next to adjacent Solar PV Arrays, and therefore there is no potential increase in visual effect from this location. The **Technical Information Note – Landscape and Visual [REP5-068]** details the potential effects at this viewpoint, which remains unchanged. Elsewhere within VRG4, the PAR Mitigation would not be visible from viewpoints 18 and 20 due to screening provided by intervening vegetation and siting of proposed Solar PV Arrays, to the west. From viewpoint 8, the PAR Mitigation would barely be perceptible as it would not noticeably protrude above the surrounding arrays when taking into account existing topography and also the existing and proposed planting within the Order limits.<br><br>The PAR Mitigation fences and/or bunds 'block' the radar beams from the PAR equipment at RAF Marham from 'striking' PV Panels. Where the topography of the Solar PV Site slopes downwards after a fence and/or bund and away from the PAR at Marham, as is shown to be the case in Fields 14 and 15 to the east of Petticoat Drove in **ES Figure 6.3: Landform [APP-080]**, it is likely that no additional fence and/or bund would be required until a rise in the topography resulted in a solar PV Panel being 'visible' above the PAR Mitigation in the line of sight of the PAR equipment at RAF Marham. At the point where PV panels would be visible above the previous PAR Mitigation fence and/or bund, another fence and/or bund would be required to screen PV Panels within the Mitigation Areas (presented on the **RAF Marham Mitigation Areas Plan [REP5-070]**). |
| SPPC3 | Page 3 Section: 3. Reference BC5 from Comments on Applicants Response to Deadline 3 Submissions (REP4-034)<br><br>The PC would comment that the age of the Breckland Landscape Character Assessment is relevant to assessing the capacity of the landscape to accommodate solar and other substantial renewable energy developments and would want to support BDC's comments in relation to LCA's D1 Swaffham Heath and E6 north Pickenham Plateau. | A detailed response regarding the adequacy of the Council's adopted evidence base, Breckland Landscape Character Assessment 2007, along with supporting site observations noted by the assessor, is provided in section 1.3 of the **Technical Information Note – Landscape and Visual [REP5-068]**. The Applicant considers this combined approach to be robust and proportionate because the published assessment remains a material consideration and has been subject to public scrutiny. |

| | | |
|---|---|---|
| | With regards to Paragraph 7.3 of GLIVIA3, the PC notes the Applicant's comments with regards to GLIVIA3 paragraph 7.5, but would contend that common sense has not prevailed and that a reasonable and proportionate assessment would include all the energy infrastructure whether proposed or built. This is because common sense tells us that the impact is not just experienced by local communities in terms of individual pieces of infrastructure but as an overall impact of all infrastructure across the landscape affected.<br><br>The Applicant's response also states: "*Where the projects are visible in-combination from the higher ground to the east at Representative Viewpoint 8 on the South Acre Road, for example, only a proportion of both projects would be visible within the same field of view.*"<br><br>It is true that only a proportion of both projects can be seen. However, the view as shown in the photo montages 6.3.2 Figure 6.14 Winter Photomontages montages (REP3-058) whilst showing fields 21, 25, 24, 23, 15 & 14 of the Droves also shows the two fields closest to the A1065 of High Grove at the northern extent of High Grove's Central Area. The Photomontages do not, as has been requested by the PC at ISH3 (Summary of oral representation made under agenda 3.1 – Landscape and Visual – REP4-050) show the cumulative impact with High Grove. The Applicant's response is misleading as stated in REP4-050 the photomontage does not include the full view from Viewpoint 8 as stated: "This might be true but the visual impact is still significant and adverse when traversing the view from south round to the southwest." As requested, High Grove areas of solar arrays should be shown in all relevant viewpoint photomontages to give a true picture of the likely cumulative impact. | A cumulative assessment has been undertaken to identify the potential for significant effects on the overall landscape, which is set by the proportionate and reasonable study area of the LVIA, judged to be within 3km. **ES Chapter 6: Landscape and Visual [REP5-046]** 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 within the Zone of Influence 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.<br><br>High Grove Solar Farm is also responsible for undertaking their own cumulative assessment. Regarding the Council's request to superimpose High Grove Solar Farm onto the visualisations for the Scheme, to demonstrate cumulative impact, this has not been undertaken, as this would not provide an accurate representation and assessment given that the details available for High Grove Solar Farm are not up-to-date nor finalised. |
| SPPC4 | Page 4/5 Section: 4. Reference BC6 from Comments on Applicants Response to Deadline 3 Submissions (REP4-034)<br><br>The PC does not think that the case can be made for not providing overlapping ZTV's with High Grove being intervisible and bordering the Droves. The area of particular concern would be in relation to VRG4. | 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 hedges or individual trees or provide an indication of the extent of the development which may be visible for any particular viewpoint. ZTVs are a tool to demonstrate the extent of theoretical visibility, which is then tested through field work and site observations. 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 extent of visibility. For these reasons, the provision of overlapping ZTVs of the Scheme with the High Grove Solar Farm are not considered necessary to provide a greater understanding of the cumulative effects when travelling through the landscape. |
| SPPC5 | Page 5 Section: 5. Reference BC7 from Comments on Applicants Response to Deadline 3 Submissions (REP4-034)<br><br>The PC would add its agreement to BDC's position that the effects on some views have been underplayed and that open panoramic views which characterise the area and the whole of the Droves site including views into the Site have not been fully accounted for.<br><br>The PDC would include those views shown in VRG4, both those included in the ES Chapter 6 Landscape and Visual and also those added and included in the ASI itinerary. | The Applicant has provided a full response on this matter in the **Applicant's Response to Deadline 3 Submissions [REP4-034]**, reference BC7, and therefore does not propose to repeat its submissions in this regard. |
| SPPC6 | Page 7 Point: 7. Response to Applicant's request for clarification in Representation at Deadline 4 – Following ASI<br><br>To clarify first point requested: We would contest that although the Applicant contends that the effects on visual receptors beyond the ZVI are Negligible in this case, there are clear views of fields 14 and 15 leading up to Petticoat Drove on the horizon. These views are created by the sloping topography which will make it difficult to mitigate and even at maturity we would expect the solar arrays to still be visible. | The Applicant notes this comment and the statements within this representation from the Interested Party. The Applicant details, in paragraph 6.6.25 of **ES Chapter 6: Landscape and Visual [REP5-046]**, that if a location within the study area is situated outside of the Zone of Visual Influence (ZVI) "*this does not mean that there would be no potential visibility outside the ZVI indicated, but rather that any visibility beyond the ZVI would be minimal*". The existing landscape features within the Order limits and wider landscape would provide a filtering effect and softening of the Scheme in the short and medium terms and established advance planting and extensive planting proposals detailed within the **outline Landscape and Ecological Management Plan (oLEMP) [REP5-060]**, coupled with existing vegetation, would serve to provide sufficient filtering and softening of the Scheme, into the wider landscape, in the long term once matured. |

| | | |
|---|---|---|
| SPPC7 | Page 7 Point 8. Response to Applicant's request for clarification in Representation at Deadline 4 – Following ASI<br><br>To clarify the second point requested: The minor road is used by many local walkers as it links into PRoW heading off from the road. The road offers large views westwards towards the Scheme and is largely open with few hedges. 6 above applies to all the points originally requested in PDA-004, although different bits of the Scheme maybe viewed as shown in Sporle with Palgrave Parish Council response to Statutory Consultation.<br><br>To clarify the last sentence in the requested second point:<br><br>*"Again, the same argument was made by the Applicant but this is a largely open road so does not apply."*<br><br>This is referring back to point 11 in Representation at Deadline 4 – Following ASI (REP4-052).<br><br>However, the Applicant contends in paragraph 1.2.14 of Technical Information Note – Landscape and Visual. REP3-083: *The proposed Solar PV Arrays would be visible within transient and intermittent views from motorists travelling along the A1065 on what is considered to be a low sensitivity receptor. On balance, the effects on the A1065 would be medium-small scale over a limited extent resulting in low-negligible magnitude and a Slight-Minimal Adverse and Not Significant effect in the long term. These assessments are further detailed within ES Chapter 6: Landscape and Visual [AS-016].*<br><br>This may be true for motorists however the impact, we would contend, is different in the case of a PRoW which this road acts as well.<br><br>Paragraph 1.2.12 of Technical Information Note – Landscape and Visual REP3-083 the Applicant contends: *Representative Viewpoint 8, South Acre Road and Peddars Way is judged to experience a small-scale effect in the long term after 25 years of the operation phase and beyond. This viewpoint is from an open field access point. The new trees and hedges along the field boundaries would further subdivide and compartmentalise views of the proposed Solar PV Arrays such that, in the context of the wider view, the Scheme would result a minor alteration in the long term*.<br><br>Effectively the Applicant is making a similar argument for PRoW's which we would contend is not the case for gaps in the hedges are important for walkers who appreciate the long views afforded by the landscape whether along South Acre Road and the Peddars Way or along the largely open Newton Road. Therefore we would contend that the LVIA in the ES Chapter 6: Landscape and Visual (AS-016) is inadequate as there are significant impacts beyond the ZVI within VRG4. | The Applicant strongly disagrees that the assessment within **ES Chapter 6: Landscape and Visual [REP5-046]** is inadequate. There are no significant impacts beyond the ZVI within VRG4.<br><br>**ES Chapter 6: Landscape and Visual [REP5-046]** concludes that, within the ZVI, long term operation phase effects upon VRG4 are assessed to be of Moderate-Slight significance and Adverse. This effect remains not significant.<br><br>Further clarity was sought from Sporle with Palgrave Parish Council on their representations, and it was confirmed location number 6 related to the Accompanied Site Inspection (ASI) route map. Location 6, as referred to in the representation, is approximately 2km east of the Order limits along Newton Road. This location is within wider VRG4 and sited outside of the ZVI, as shown on **ES Figure 6.7: Visual Receptor Groups [REP3-056]**. The Applicant details, in paragraph 6.6.25 of the **ES Chapter 6: Landscape and Visual [REP5-046]**, that if a location within the study area is situated outside of the ZVI "*this does not mean that there would be no potential visibility outside the ZVI indicated, but rather that any visibility beyond the ZVI would be minimal".* As was presented by the Applicant on the ASI at this location, the visual impact at this location would be minimal and would not be significant given that:<br><br>• only a small area of the Scheme may be perceptible approximately 2km to the west<br>• where visible, the Scheme would form a small part of a wider view which also includes views of existing pylons in close proximity to this location, tempering potential effects<br>• the existing landscape features within the Order limits and wider landscape would provide a filtering effect and softening of the Scheme in the short and medium terms; and<br>• established advance planting and extensive planting proposals detailed within the **oLEMP [REP5-060],** coupled with existing vegetation, would serve to provide sufficient filtering and softening of the Scheme, into the wider landscape, in the long term once matured.<br><br>With regard to receptors along the A1065, the Applicant disagrees that this highway route should be considered the same as a Public Right of Way (PRoW) receptor. The A1065 is a public vehicular highway. Whereas PRoW usually comprise public footpaths, bridleways, restricted byways and byways open to all traffic which are shown on Norfolk County Council's definitive map. |
| **Castle Acre Parish Council (further submission) [REP5-081]** | | |
| CAPC1 | Refer to the Issue Specific hearings in September and the Examining Inspectors further question EXQ3 Q2.0.2Ref: "Issue Specific Hearing 3, Item 3-1, post hearing note, Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [REP4-035] refers to if mitigation acceptable to the Ministry of Defence (MoD), could not be achieved within those parameters [referred to above], the [PV] panels in the affected areas would not be built. Could the applicant and DIO clarify how this restriction would be secured in the DCO?" | The Applicant refers to its response to this matter in Q2.0.2 of the **Applicant's Response to ExQ3 [REP5-078]**, in which the Applicant confirmed that DCO requirement for PAR Mitigation requires a detailed plan for this mitigation to be submitted by the Applicant to the relevant planning authority for approval (in consultation with the DIO) prior to the commencement of any part of Work No. 1(a) within the specifically-identified mitigation areas. That plan must include details of the dimensions, layout and material composition of the mitigation, and the mitigation must be in accordance with the relevant parameters of the **Design Principles, Parameters and Commitments [APP/5.8.6]**. Therefore, given it would be a criminal offence for the Applicant to not comply with the DCO requirement for PAR Mitigation and/or the parameters within the **Design Principles, Parameters and Commitments [APP/5.8.6]**, it is appropriately secured in the **draft DCO [APP/3.1.6]** that the Applicant cannot build PV panels in the affected areas if the mitigation is not acceptable to the DIO. |

| | | |
|---|---|---|
| | | The Applicant has responded to the further queries from Castle Acre Parish Council in the corresponding rows below. |
| CAPC2 | Question 1. What is the area, in acres and hectares, of the RAF Marham Mitigation proposed on Document 8.26 RAF Marham MAP? This now appears to impact on Fields 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 15 which is greater than originally indicated. Can you please confirm the fields which will have RAF mitigation areas? | The Applicant confirms that the total area identified in the **RAF Marham Mitigation Areas Plan [REP5-070]** is 137.3 hectares or 339.3 acres. These mitigation areas cover, to varying degrees, Fields 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14 and 15. |
| CAPC3 | Question 2. What percentage area of the total development does this now represent please? (15%?) Referring to the above if this area is not to be built, surely the NSIP application as a whole has to be questioned. | The Applicant confirms that the total area for the mitigation areas identified in the **RAF Marham Mitigation Areas Plan [REP5-070]** is approximately 14.7% of the Order limits. The Applicant proposes to have solar PV panels within these areas, but these should not impact on RAF Marham's PAR with the mitigation measures in place, to be agreed with the DIO at detailed design stage. If fencing or bunding in these areas needed to exceed 4.5m in height to shield these solar PV panels, this would breach the commitments in the **Design Principles, Parameters and Commitments [APP/5.8.6]** and therefore would not be permissible. In that scenario, the solar PV panels within the shielded area of the fencing would be removed, along with the fence and/or bunding, to avoid any structures exceeding the 4.5m maximum parameters. |
| CAPC4 | Ref: Q9.0.1 The applicant. Notification of Gate 1 connection offer. "With reference to National Grid Electricity Transmission plc's (NGET) written representation [REP1-090] paragraph 3.7, could the applicant confirm whether it has received notification from the National Energy Systems Operator (NESO) that it will receive a Gate 1 connection offer? If so, could a copy be provided with its response?" We still cannot understand the applicants claims that this specific development is, (as stated many times) critical infrastructure when indeed no Gate 1 connection has been offered and consequently there is no confirmed site for the customers substation. This application is surely pre-mature and cannot be fully considered without this vital information. | The Applicant has responded to this matter in full in the **Applicant's Response to Deadline 4 Submissions [REP5-077]** (specifically with reference to AM-8, AM-9 and AM-10) and therefore refers the Council to the full information provided in that document. |
| CAPC5 | Can we please have an update on the request by ourselves and others for further Bird Surveys to be carried out across the site specifically in relation to the Red Listed protected species, 'Stone Curlew'. There was evidence of their presence on the site last year, expert opinion suggests there should be three to five years of survey work carried out, can we have confirmation that this will be done as survey work to date appears to be inadequate. | Natural England has confirmed, in **Natural England's Written Representation [REP1-093]** that "*should further surveys find Stone-curlew nests within the proposed order limits, Natural England would not consider these nests to be part of the SPA population*", such that any further need for consideration would therefore relate to direct legislative protection of this species. In this regard, Stone-curlew is protected under Schedule 1 of the Wildlife and Countryside Act 1981. All wild birds receive protection under Section 1 of the Wildlife and Countryside Act 1981 in respect of killing and injury. In addition, their nests, while being built or in use, cannot be taken, damaged or destroyed. Schedule 1 birds (including Stone-curlew) receive greater protection such that it is an offence to intentionally or recklessly disturb them while building a nest or whilst they are on or near a nest containing eggs or young, or disturb their dependent young. Stone-curlew receives no additional specific legal protection at other times.<br><br>The reported presence of individual Stone-curlew within the Site (if confirmed) during the autumn period clearly represents dispersing individuals, rather than any evidence of nesting activity. Nonetheless, proposed mitigation measures are set out within the **oCEMP [REP5-062]** in order to safeguard nesting birds (including ground nesting species such as Stone-curlew) which will prevent harm to any individuals present and ensure no offence is caused. Accordingly, no further surveys are considered necessary for Stone-curlew at this time. |
| CAPC6 | National policy states that the use of BMV land for solar development should be avoided. The applicants survey work has found large areas of this site are classified as BMV land, some 54%. Irrigation is also available to much of this site allowing high value specialist crops such as potatoes, carrots, onions to be successfully grown in rotation across the whole area. Surely this is further evidence that the site selection is inappropriate. | The Applicant has set out the site selection process and justifications in Appendix 1 of the **Planning Statement [APP/5.5.3]** and in **ES Chapter 4: Reasonable Alternatives and Design Evolution [REP3-028]**. This outlines that the suitability of the land for solar development is due to a number of factors including the lack of landscape and environmental statutory designations, limited residual receptors, and accessibility from a major highway network. Therefore, and in accordance with Paragraph 2.10.22 NPS EN-3 which sets out that the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land , the suitability |

| | | |
|---|---|---|
| | | of the siting of the Scheme is not just based on the quality of the land, there are multiple factors which contribute to the selection of land.<br><br>The provisional ALC mapping and the predictive Likelihood of BMV maps, referenced in **ES Chapter 11: Soils and Agriculture [APP/6.2.3]** (Plate 11-1 and Plate 11-2) indicated that this was likely to be some of the poorest land in Norfolk. The 2026 Predictive ALC Map for England (Plates 11-44 and 11-45) continue to predict this as some of the poorest quality land in Norfolk.<br><br>The Applicant recognises the preference in policy for poorer quality land to be used over BMV farmland, but as set out in the **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]**, the majority of Norfolk is predicted to be of BMV quality. Poorer quality land is generally not available, and, as the Applicant has set out in the **Planning Statement [APP/5.5.3],** the Scheme is classified as Critical National Priority infrastructure and meets the tests set out in paragraph 4.2.30 of NPS EN-1 for the Secretary of State's decision-making process. |
| CAPC7 | Community Benefits and Applicant engagement. To this point the lack of meaningful engagement with local communities by the applicant is hugely disappointing. However, some progress, there is an initial meeting involving representatives from local communities and the applicant planned for next week, we shall listen with interest to what the applicant has to say. It was our desire to have some commitment from the applicant before the end of the examination process, this will now clearly not be possible. | For the reasons set out throughout the Examination, the Applicant believes it has meaningfully engaged with all Interested Parties, and welcomes the opportunity to continue to do so once the Examination has concluded. Throughout the pre-application process, and during the Examination, the Applicant has been clear that a Community Benefit Fund is being proposed as part of the Scheme. Should the Scheme receive development consent, this fund is to be independently administered by a local foundation and would be available for local initiatives to provide services to the community.<br><br>A meeting with representatives of local Parish Councils took place on 21 October 2026 in continuation of the dialogue associated with community benefits, during which the Applicant discussed and confirmed the commitment for the Community Benefit Fund. |

# 3. The Applicant's responses to Prescribed Bodies

| Reference Number | Comments | Applicant's Response |
|---|---|---|
| **Ministry of Defence (Responses to the ExQ3) [REP5-085]** | | |
| MOD1 | The applicant and the MOD have agreed the wording of a dedicated Requirement for inclusion in the draft DCO to secure the submission of relevant detailed plans of shielding structures for approval by the local planning authority in consultation with the MOD.<br>The MOD and the applicant have updated and completed the Statement of Common Ground on 15th October 2026. This documents the latest position of the MOD on matters that had been outstanding confirming that these have all been agreed.<br>The MOD has also withdrawn their objection to the Scheme. | The Applicant agrees that wording has been agreed between the parties for DCO requirements in relation to all outstanding concerns of the MoD (including PAR Mitigation) relating to RAF Marham, all of which are included in Schedule 2 of the **draft DCO [APP/3.1.6]**.<br>The Applicant also submitted the signed **SoCG with Defence Infrastructure Organisation [REP5-034]** at Deadline 5 which reflects this agreement. |
| **National Grid Electricity Transmission plc (Comments on the Deadline 4 submissions and any other information requested by the ExA for Deadline 5) [REP5-086]** | | |
| NGET1 | 2.4 The Applicant has proposed a set of protective provisions in the draft Order which NGET (Applicant Protective Provisions) which do not acknowledge the evolving nature and location of the connection point and deviate from the NGET Protective Provisions in a number of key respects. As such, the Applicant Protective Provisions provide inadequate protection for both the existing and future NGET infrastructure which would cause serious detriment to NGET's undertaking.<br>Appendix 1 of this document outlines NGET's Protective Provisions, and Appendix 2 outlines a comparison with the Applicant's Protective Provisions. | The Applicant and NGET are close to finalising the form of protective provisions for NGET's benefit to be included in the **draft DCO [APP/3.1.6]**. The parties have agreed that they will write to the ExA / Secretary of State (as applicable), once that agreement has been reached, to provide them with a copy of those agreed protective provisions (which will replace those currently in Part 3 of Schedule 15 of the **draft DCO [APP/3.1.6]**) well in advance of determination of the DCO by the Secretary of State. |
| **National Highways (Comments on the Deadline 4 submissions and any other information requested by the ExA for Deadline 5) [REP5-087]** | | |
| NH1 | NH1<br>Paragraph 26 of the Department for Communities and Local Government Planning Act 2008: Guidance related to procedures for compulsory acquisition of land (2013) (the CA Guidance) states that as a contingency measure, applicants should plan for compulsory acquisition at the same time as conducting negotiations. NH does not take issue with this as a matter of principle, but it does not address NH's point that the rights sought are neither necessary or proportionate when clearly an alternative approach is available to the Applicant.<br>NH's position remains as set out at CAH1 held on Wednesday 9th September 2026 – see REP4-054 for full details. The only interaction between the proposed development and the SRN relates to the land plots identified where temporary possession powers are sought solely, it is understood, to facilitate AIL movements during construction. NH maintains that an available alternative exists and thus the statutory guidance governing the grant of temporary powers is not met. In terms of the examples given by the Applicant, these are not comparable. Full details are in NH's summary of CAH1 but for completeness:-<br>London Luton Airport Expansion DCO is not comparable, as it did not involve temporary maintenance-type works and did not relate to AILs, instead concerning access to NH land to construct permanent SRN mitigation works. | In respect of the matter of compliance with the Department for Communities and Local Government Planning Act 2008: Guidance related to procedures for compulsory acquisition of land (2013) and the necessity and proportionality of the Applicant's approach to the relevant NH plots, the Applicant refers to the **Applicant's Response to Deadline 4 Submissions [REP5-077]** (specifically with reference to NH2-1) for its explanation and position, rather than repeating its reasoning on this matter in full. The Applicant accepts that the parties are likely in a position of 'agreeing to disagree' on this matter, and therefore the Secretary of State will decide on this matter when determining the DCO.<br>NH correctly state that the Applicant will not remove the plots in question from the **Book of Reference [APP/4.3.4]** nor the **draft DCO [AP/3.1.6]** during the Examination. However, the Applicant and NH have agreed and finalised the form of protective provisions for NH's benefit to be included in the **draft DCO [APP/3.1.6]**, subject to the execution of the corresponding side agreement (the form of which is also agreed). The parties have agreed that they will write to the ExA / Secretary of State (as applicable), once that side agreement has been executed, to provide a final copy of those agreed protective provisions well in advance of determination of the DCO by the Secretary of State. Part 4 of Schedule 15 of the **draft DCO [APP/3.1.6]** submitted at Deadline 6 includes the agreed protective provisions for NH's benefit. |

| | | |
|---|---|---|
| | In Lime Down Solar the only works affecting the SRN relate to a crossing of the M4 with an underground cable. There is no other NH operational land involved. Accordingly, the DCO is therefore for the construction of permanent works under the SRN and is therefore not comparable with the situation at The Droves.<br><br>Yorkshire Green Energy Enablement DCO, the works affecting the SRN all relate to access for permanent overhead line works, which again, is not comparable with the proposals relating to the Droves.<br><br>In relation to Light Valley, NH's land interests are not yet clear, and the examination is at an early stage. With that in mind, Light Valley is not comparable.<br><br>None of the examples quoted provide a suitable comparison as they relate to permanent works on NH operational land, as opposed to temporary works of a maintenance nature, with scope unknown pre-consent, and where an alternative established mechanism exists.<br><br>NH understands that the Applicant will not agree to removing the NH plots from the Book of Reference, Order Limits and the DCO. With that in mind, if the Applicant's proposed powers over these parcels remain in the DCO, then NH requires its form of protective provisions to be agreed. The fact that NH is actively negotiating PPs with the Applicant and has agreed in principle that the PPs should reflect those agreed at Green Hill and those being agreed at Lime Down does not in any way indicate that NH agrees that the DCO should grant the Applicant powers of temporary possession. Agreeing PPs here will not address NH's concerns but rather provide a back-up plan should the ExA and/or the Secretary State find against NH on this issue. | |
| NH2 | NH4<br><br>As stated in its initial response, NH concurs that a detailed noise assessment is unlikely to be required due to the nature and scale of works expected to be required, albeit it is premature to confirm these.<br><br>NH points out, however, that permanence of works is not in itself a determinant of whether a noise assessment is required in accordance with DMRB. Temporary works can require a noise assessment to be undertaken if they are of a significant scale and extensive duration.<br><br>NH points out that this question only arises because the temporary works required to facilitate the movement of AILs are included in the dDCO. In NH's view this is unnecessary and can be dealt with through NH's established ESDAL procedures. | A robust construction and construction traffic noise assessment based on the peak construction traffic month has been presented in **ES Appendix 10.3: Construction and Noise Modelling [APP-166]**. This assessment shows negligible traffic noise effects, including HGV movements; furthermore, temporary construction works to facilitate Abnormal Indivisible Loads (AILs) deliveries are also assessed to be minor short-term effects at most, which are not significant in EIA terms as shown in **ES Chapter 10: Noise and Vibration [REP3-030]**. The Applicant confirms that these non-significant activities will be short in duration and limited to temporary works as described in Part 2 of Schedule 5 of the **draft DCO [APP/3.1.6]**.<br><br>While the Electronic Service Delivery for Abnormal Loads system may be used to schedule and plan the AILs deliveries, commitments associated with the necessary road upgrade construction works, mitigation measures, best practice, and management of traffic and AILs delivery procedures have been set out in the **oCEMP [REP5-062]** and **oCTMP [REP5-064]**, both of which are secured via corresponding requirements in Schedule 2 of the **draft DCO [APP/3.1.6]**. |
| NH3 | NH7<br><br>NH is content with the Applicant's response on this matter and has no further objections on traffic grounds.<br><br>NH does not agree that the wording in Requirement 15(2) of Schedule 2 is sufficiently clear and requests that a change is made to refer to "relevant highway authority or authorities" to avoid any ambiguity. This change was agreed in relation to the recent East Park Energy DCO application and is explicit in the current Merdian Solar DCO drafting, for example. NH does not consider this to be neither onerous nor detrimental to the Applicant<br><br>NH8 | The Applicant's position on these matters is set out in the **SoCG with National Highways [APP/5.17.3]** and the Applicant, therefore, does not propose to repeat its submissions and instead refers the ExA to that document. It is accepted that the parties 'agree to disagree' on the particulars of the wording of Requirements 15 and 20 of the **draft DCO [APP/3.1.6]** and that the Secretary of State will therefore decide on this specific wording when determining the DCO, but the Applicant notes that its drafting mirrors the approach taken on the recently-consented Green Hill Solar Farm Order 2026. |

| | | |
|---|---|---|
| | NH notes the Applicant's comments and points to its comments above in relation to Requirement 15 (2). NH considers that the same should be applied in respect of Requirement 20 (4). | |
| NH4 | NH10<br><br>Negotiations on the form of protective provisions are on-going. Latterly it has been agreed that the form of PPs will reflect those agreed for Green Hill Solar Farm and those being agreed for Lime Down Solar Farm. | The Applicant and NH have agreed and finalised the form of protective provisions for NH's benefit to be included in the **draft DCO [APP/3.1.6]**, subject to the execution of the corresponding side agreement (the form of which is also agreed). The parties have agreed that they will write to the ExA / Secretary of State (as applicable), once that side agreement has been executed, to provide a final copy of those agreed protective provisions well in advance of determination of the DCO by the Secretary of State. Part 4 of Schedule 15 of the **draft DCO [APP/3.1.6]** submitted at Deadline 6 includes the agreed protective provisions for NH's benefit. |
| NH5 | 3 – Item 1<br><br>NH made similar submissions set out above in connection with the Green Hill Solar Park DCO. The Green Hill Solar Park DCO, reference EN010170, was made on 8 October 2026. On that point the ExA did not agree to change Requirement 3. Notwithstanding the above, NH's position remains that it is best placed to assess whether any amendment to an approved document, however seemingly minor, may impact the SRN. NH accepts however that it would not proportionate for the Applicant to consult with NH on every change to a certified document.<br><br>To address this, NH proposes a minor amendment to Requirement 3 to secure that NH is consulted on amendments to certified documents, but only insofar as those amendments relate to the operation of the SRN or any land in which NH holds an interest. The following change (shown in red below) would address NH's concerns<br><br>*The undertaker may submit any amendments to any approved document to the relevant planning authority for approval (in consultation with National Highways where relevant, in the context of the operation of the Strategic Road Network or any of its interests in land), and, following approval, the relevant approved document is to be taken to include the amendments approved under this paragraph.* | The Applicant does not intend to amend Requirement 3 of the **draft DCO [APP/3.1.6]** in the manner suggested by NH. The Applicant's drafting mirrors the approach taken on the recently-consented Green Hill Solar Farm Order 2026 and the Lime Down Solar Park DCO, so the Applicant does not propose to depart from this consistent and precedented wording. It is accepted that the parties 'agree to disagree' on the particulars of the wording of Requirement 3 and that the Secretary of State will therefore decide on this specific wording when determining the DCO. |
| NH6 | The ExA has indicated in the schedule of proposed changes to the DCO published on 29 September 2026 that the time periods in Schedule 16 3(2) and (3) should be changed to provide greater response times. NH is grateful to the ExA for revising the time periods, but the revised drafting still does not solve NH's issue. Under the revised drafting, the time NH has to review an application depends on how much of its own time allowance the local authority uses. If the authority uses its full allowance, NH could have as little as 5 working days, from day 5 to day 10, to review the application, prepare a response and make any request for further information. That is not enough time to review technical submissions of the kind expected under these requirements. The Applicant says that NH is protected because it can work from the copy of the application it receives under paragraph 2(1), rather than waiting for the authority's formal consultation. We do not accept that this gives adequate protection. Paragraph 2(1) gives NH no right to be consulted and no right to have its request passed on. It also does not stop the day-20 cut-off from running. This is particularly important where the consequence of missing the cut-off is loss of the opportunity to obtain further information. NH therefore request that the drafting is amended so that NH has a suitable guaranteed minimum period of 15 working days, running from the date it receives the formal consultation. The authority's determination period and the day-20 cut-off should be extended to 25 working days to accommodate that period, so that the time allowed to the consultee cannot be reduced by the time the authority itself takes and the authority should be under an obligation to issue the consultation in a shortened period of 5 working days. This would mean that if the authority uses its full allowance at each stage, NH still get 15 working days to decide whether further information is required. | The Applicant responded in full to the ExA's proposals in respect of this matter in the **Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO [REP5-079]** and therefore does not propose to repeat its submissions in this regard.<br><br>The Applicant's overall drafting of paragraphs 3(2) and 3(3) of Schedule 16 of the **draft DCO [APP/3.1.6]** mirrors the approach taken on the recently-consented Green Hill Solar Farm Order 2026 and the Lime Down Solar Park DCO, so the Applicant does not propose to depart from this consistent and precedented wording in the manner suggested by NH. It is accepted that the parties 'agree to disagree' on the particulars of the wording of Schedule 16 and that the Secretary of State will therefore decide on this specific wording when determining the DCO. |

# 4. The Applicant's responses to Elected Representatives

| Reference Number | Comments | Applicant's Response |
|---|---|---|
| **James Wild (Comments on the ExA's schedule of changes to the draft Development Consent Order) [REP5-092]** | | |
| JW1 | I strongly welcome the ExA's proposed modifications to Article 2 of the draft DCO (Interpretation) 1. By agreeing with the Borough Council of King's Lynn and West Norfolk to explicitly exclude full-scale removal, reconstruction, or replacement from the definition of routine maintenance, the ExA provides helpful legal clarity. This modification distinguishes ongoing operational maintenance from redevelopment, confirming that any future wholesale replacement would require a fresh application for development consent and reinforces the focus on the end-of-life arrangements when the 60-year operational period concludes. | The Applicant has responded to this matter in full in the **Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO [REP5-079]** and therefore directs the Interested Party to this document.<br><br>In summary, though, the Applicant does not anticipate undertaking the removal, reconstruction or replacement of the whole of the Scheme as part of its maintenance. However, the Applicant does not consider the proposed amendment to be necessary, because the complete replacement of the solar PV panels has been fully assessed throughout the ES. As a result, the proposed definition of "maintain" is accurate and should not be altered. |
| JW2 | I also welcome the ExA's Third Written Questions Q2.0.1 and Q2.0.2 2. RAF Marham is a vital national defence asset operating F-35 aircraft, where flight safety must be fully safeguarded. However, the Applicant's proposed physical mitigation which includes installing earth bunds or fencing up to 4.5 metres high across radar corridors introduces substantial visual and landscape impacts that have not been evaluated within the Environmental Statement (ES). As such, I strongly support the ExA in asking the Applicant to provide evidence demonstrating, prior to any decision, that the effects of these physical mitigations have been fully assessed for all relevant topics within the ES. Wherever radar safety cannot be demonstrated, restrictions on solar arrays should be secured within the draft DCO, and I therefore also endorse the ExA's request for clarity on how this would be achieved. | The Applicant has responded to this concern in full at BCKLWN1 above, and therefore refers the Interested Party to that response, which confirms that the Applicant has provided sufficient evidence to demonstrate that the effects of the PAR Mitigation have now been fully assessed for all relevant topics within the ES.<br><br>If fencing or bunding in PAR Mitigation areas needed to exceed 4.5m in height to shield these panels, this would breach the commitments in the **Design Principles, Parameters and Commitments [APP/5.8.6]** and therefore would not be permissible. In that scenario, the solar PV panels within the shielded area of the fencing would be removed, along with the fence and/or bunding, to avoid any structures exceeding the 4.5m maximum parameters. |
| JW3 | Ownership Following Compulsory Acquisition The application provides for eventual site decommissioning 3, but the legal position potentially becomes contradictory where compulsory acquisition of freehold land is sought. Where a landowner retains underlying freehold title under a voluntary lease arrangement, ownership remains separate from the project and the land automatically reverts to the owner at the end of that term.<br><br>However, where private freehold title is compulsorily acquired, the original landowner retains no ongoing legal interest, with title remaining permanently vested in the project company or a successive owner. In these circumstances, describing the land as being "returned to the landowner" post-decommissioning lacks clarity. I therefore ask the ExA to require the Applicant to clarify the extent of land subject to compulsory freehold acquisition, identify who will hold legal title once generation ceases, and explain how this ownership structure aligns with the ultimate legal duty to restore the site. | The legal position is not contradictory in respect of the Applicant's proposed approach to compulsory acquisition. The Applicant notes that these matters are discussed at length in the **Statement of Reasons [REP3-009]** and the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at CAH1 [REP4-036]** and therefore refers the Interested Party to these documents.<br><br>The Applicant notes that there is an Option Agreement with the relevant landowner that clarifies that the 'pink' land will be returned to the landowner at the end of the decommissioning of the Scheme. Permanent acquisition is 'permanent' in the context of the Scheme's lifecycle, but will be returned to the landowner after decommissioning of the Scheme. Whilst this is 'temporary' in the context of the overall existence of the land to an infinite point in the future, it is referred to as 'permanent' due to the 60-year operational period of the Scheme.<br><br>In respect of compulsory freehold acquisition, this is shown coloured pink on the **Land Plan [APP/2.2.1]**. This relates to land required for the Solar PV, the BESS, the Customer Substation and the National Grid Substation. In respect of generation ceasing, restoration and decommissioning, there is a requirement to decommission the Scheme in Requirement 20 of the **draft DCO [APP/3.1.6]** and failing to comply with that requirement would be a criminal offence. The requirement to decommission the Scheme would sit with the owner at the time of decommissioning, and that is covered appropriately in agreements with |

| | | |
|---|---|---|
| | | landowners. As stated above, the 'pink' land will be returned to the landowner after decommissioning and it is therefore at the landowner's discretion what to do with the relevant land at that time. |
| JW4 | Financial Security for Decommissioning Liabilities This in turn exposes a weakness in the application framework. Establishing site clearance as a binding legal requirement is only meaningful if there is sufficient financial capacity to discharge the corresponding decommissioning obligation. To date, the Applicant has provided no evidence of any dedicated financial security mechanism, such as a decommissioning bond, escrow account, sinking fund or parent company guarantee, to underwrite ultimate liability.<br><br>Over a 40 to 60 year operational life, energy infrastructure Special Purpose Vehicles may be sold, refinanced, restructured or enter insolvency, creating a risk decommissioning obligations become detached from the financial capacity of the entity ultimately responsible for meeting them. Statutory DCO enforcement powers may compel a solvent undertaker to act, but they cannot secure restoration capital from an entity that lacks sufficient assets when those liabilities fall due. The Applicant should be invited to explain what planning or policy basis justifies omitting a specific, legally binding financial security mechanism from the draft DCO, and who would bear the cost of site clearance if the undertaker or successor entity were unable to meet its obligations. | The Applicant completely disagrees that there is any weakness or omission in the DCO Application framework in this regard, nor that the Applicant has not provided sufficient evidence to demonstrate available funding for decommissioning.<br><br>Again, the Applicant wishes to reiterate that there is a requirement to decommission the Scheme in Requirement 20 of the **draft DCO [APP/3.1.6]** and failing to comply with that requirement would be a criminal offence (this is, therefore, a binding mechanism).<br><br>Further, the agreements with landowners include decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant, or in the event of insolvency of the Applicant. The amount of such decommissioned security would be regularly revalued throughout the lifecycle of the Scheme and topped up if necessary. |
| JW5 | Cumulative Impact of Further Infrastructure Proposals I also note recent proposals for the Longmarsh Green Energy project in West Norfolk, including up to 1.3GW of solar generation alongside a major data centre. This adds to the growing concentration of large-scale energy schemes including High Grove and East Pye. Even at this late stage of the inquiry, I recommend the ExA considers this when assessing cumulative impacts, including implications for land use, grid connections, associated infrastructure at Walpole and pressure on surrounding communities. | The Longmarsh Green Energy project submitted its EIA Scoping Report to PINS on 26 October 2026. In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) and PINS Advice Note on cumulative effects assessment[1], the potential for likely significant cumulative effects with Longmarsh Green Energy has been assessed in the relevant topic chapters of the ES for the Scheme, even at this late stage of the Examination, which demonstrates the proactive and robust nature of the Applicant's cumulative assessment. The following ES chapters have been updated and submitted at Deadline 6 to consider the potential for cumulative effects with Longmarsh Green Energy:<br><br>- **ES Chapter 7: Ecology and Biodiversity [APP/6.2.3]**<br><br>**- ES Chapter 9: Transport and Access [APP/6.2.2]**<br><br>**- ES Chapter 11: Soils and Agriculture [APP/6.2.3]**<br><br>**- ES Chapter 14: Socio-Economics [APP/6.2.2]**<br><br>**- ES Chapter 15: Human Health [APP/6.2.2]**; and<br><br>**- ES Chapter 16: Other Environmental Matters [APP/6.2.2]** (in relation to Waste and Glint and Glare assessments). |

[1] Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment

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

| Reference Number | Comments | Applicant's Response |
|---|---|---|
| **Antony Morgan (Comments on the Deadline 4 submissions and any other information requested by the ExA for Deadline 5) [REP5-090]** | | |
| AM1 | Crucially, the developer's own surveys confirm what local residents have always known: more than 50% of this site is Best and Most Versatile (BMV) agricultural land. Taking thousands of acres of higher-quality, top-tier food-producing land out of production during a national food security crisis is indefensible. This directly undermines the core tenets of NPS EN-3, which requires solar developments to preferentially seek lower-quality land and avoid disruption to prime food production. | The Applicant has responded to this concern in full at CAPC6 above, and therefore refers the Interested Party to that response. |
| AM2 | I strongly support the Examining Authority's scrutiny of the Applicant's use of vague language such as "applicable period" instead of a fixed, non-negotiable end date in the draft DCO requirements. This drafting creates a clear risk of a permanent land grab by stealth, allowing the developer to delay or bypass the return of this ground to full agricultural use. The ExA must protect our land and reject any wording that fails to impose a rigid, non-extendable operational lifespan with clear decommissioning obligations. | The Applicant refers to its response to Q7.1.1 in the **Applicant's Response to ExQ3 [REP5-078]**, in which it agreed with the ExA that the use of "*applicable period*" was insufficiently precise – the Applicant has therefore updated Requirement 2 of Schedule 2 the **draft DCO [APP/3.1.6]** to clarify the fixed time period, as requested. |
| AM3 | It is unacceptable that, at this late stage of the examination, safety issues regarding RAF Marham's Precision Approach Radar remain unresolved. Worse still, the developer's proposed solution involves erecting industrial earth banks and/or walls/fencing up to 4.5 metres high to block radar interference. Adding 4.5-metre-tall engineered structures across our open horizons proves this project is being forced into a completely inappropriate location. These mitigations introduce severe, additional landscape harms that have not been properly assessed and demonstrate a profound failure of basic site selection. | The Applicant has responded to this concern in full at BCKLWN1 above, and therefore refers the Interested Party to that response, which confirms that the Applicant has provided sufficient evidence to demonstrate that the effects of the PAR Mitigation have now been fully assessed for all relevant topics within the ES.<br><br>Further, the Applicant has agreed wording with the MoD for DCO requirements in relation to all outstanding concerns of the MoD (including PAR Mitigation) relating to RAF Marham, all of which are included in Schedule 2 of the **draft DCO [APP/3.1.6]**.<br><br>The Applicant also submitted the signed **SoCG with Defence Infrastructure Organisation [REP5-034]** at Deadline 5 which reflects this agreement. |
| **Mark Holmes (Comments on the Deadline 4 submissions and any other information requested by the ExA for Deadline 5) [REP5-091]** | | |
| MH1 | In late September (2026) at least 2 Stone Curlews were recorded by myself & another observer who is also experienced in recording Stone Curlews. These records were from the field where the substation is provisionally planned, This is now the third Autumn in a row where Stone Curlews in varying numbers have been recorded in this immediate area of the planned Droves site. This is therefore clearly now an established Autumn staging post for Stone Curlews (used prior to migration). Hence the continuous use of this site as a staging post in the autumn provides a further very strong objection against & reason for NOT building the substation/solar plant here.<br><br>I have spoken to & provided these latest Stone Curlew records from the Droves site to Tim Cowan, RSPB officer for Stone Curlews in Breckland, He agreed that these birds may yet again have bred on the Droves site (ie. in at least 2025 & 2026) and that this again provides more evidence that the applicant MUST perform at least 3 sequential years of Stone Curlew survey work (ie. 2027,2028 & 2029) to ensure that Stone Curlews are properly surveyed for on this Droves site (in view of Stone Curlew breeding site rotation which follows crop rotations, as previously explained). Tim Cowan again confirmed that the applicant's previous, limited & now | The Applicant has responded to this concern in full at CAPC5 above, and therefore refers the Interested Party to that response. |

| | | |
|---|---|---|
| | out of date Stone Curlew survey work is both INADEQUATE & UNSAFE for this rare Schedule 1 protected bird species. | |
| MH2 | From the point of view of other important Biodiversity species on this site, in the last month there was a further rare British mammal record of a female Polecat from the northern edge of the Droves site & there have also been multiple sightings of the rare migrant Clouded Yellow butterfly on the Droves site, as recently as 12.10.26. | The Scheme is unlikely to result in any significant adverse effects on Polecat should this species be present. Measures set out within the **oCEMP [REP5-062]** in order to safeguard mammal species will safeguard any individuals present during construction activities. In the long term, the internal field areas proposed for Solar and BESS are formed by arable land which is unlikely to provide particular opportunities for this species, whilst the scheme will likely benefit this species should it be present, through the strengthening of existing habitat corridors and vegetation.<br><br>Clouded Yellow butterfly is a migrant species which has been seen in particularly large numbers throughout the UK during 2026. The species is normally unable to survive the winter in the UK and therefore does not represent a breeding species. Nonetheless, caterpillars feed on a variety of wild and cultivated clovers, which would likely be more abundant within the grassland habitats under the Scheme than the current arable land. Accordingly, the Scheme is unlikely to result in any adverse effects on this species. |
| **Leslie David Ormerod (Comments on the Deadline 4 submissions and any other information requested by the ExA for Deadline 5) [REP5-093]** | | |
| LDO1 | The Longmarsh Green Energy Project Between Swaffham and Downham Market has just been announced, comprising a further 4,700 acres for a mega-solar energy installation and data center. 11,100 acres of solar developments are being simultaneously proposed for an already land access-depleted environment. The almost wall-to-wall nature of country estate landholdings in this area of Norfolk appears also not to have been considered, as shown in the attached Figure 2 map, suggesting that these developments would be better placed almost anywhere else in Norfolk. | The Applicant has responded to this concern in full at JW5 above and therefore refers the Interested Party to that response.<br><br>The process of site selection has been presented in **ES Chapter 4: Reasonable Alternatives and Design Evolution [REP3-028]** and the **Planning Statement [APP/5.5.3]**. A site evaluation was undertaken to determine the suitability of the Site for this type of development, which considered irradiance and topography, network connection, proximity of the site to dwellings, environmental considerations, ALC and land type, and accessibility. The results of this evaluation determined that the Site was a suitable location for a Solar and BESS development, such as the Scheme. |
| LDO2 | 1.2 To date, the examination has assessed cumulative impacts through a narrow, forward looking lens., examining only contemporaneous or pipeline ground-based solar-related developments (Figure 1); there extraordinary regional imbalance created by the proposed by the Swaffham solar developments, however is clear from this cartographic evidence using the Applicant's mistaken compounding criteria.<br><br>1.3. This representation argues that the Applicant's Environmental Statement (ES) suffers from a methodological baseline paradox. By "baselining out" there past, the Applicant treats the the current landscape as an infinite, empty canvas. In reality, Swaffham and the wider West Norfolk landscape have suffered a colossal, century-long systemic subtraction of territory to state, military, industrial, and hereditary enclosures. | The Applicant's assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and PINS Advice Note on cumulative effects assessment, and the approach is detailed in full within **ES Chapter 2: EIA Process and Methodology [APP-051]** and **ES Appendix 2.4: Cumulative Schemes [APP/6.4.2]**. Cumulative assessments within each of the technical topic chapters have been undertaken in accordance with the relevant topic-specific guidance and best practice approach, assessing a reasonable worst-case scenario.<br><br>The Applicant acknowledges the concern regarding historic landscape change; however, the approach taken in the ES is in accordance with the requirements of Schedule 4 of the EIA Regulations. This stipulates the requirement of the ES to describe the "*current state of the environment*", i.e. the baseline scenario, as well as stating that cumulative schemes that *are completed before the construction of a proposed development (i.e. the Scheme), "effects arising from them should be considered as part of the baseline*". The ES has appropriately assessed effects against the baseline scenario in accordance with the requirements of the EIA Regulations. The historic landscape of the area has, however, been a consideration in establishing the baseline conditions for **ES Chapter 6: Landscape and Visual [REP5-046]** and **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]**, to inform the value/sensitivity of the receiving environment to the Scheme. |
| LDO3 | 2.1 Under the National Planning Policy framework (NPPF) guidelines and Planning Inspectorate iInfrastructure standards, a lawful CEA must evaluate the local compounding pressure on a receiving environment. | The Applicant's assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and PINS Advice Note on cumulative effects assessment, and the approach is detailed in full within **ES Chapter 2: EIA Process and Methodology [APP-051]** and **ES Appendix 2.4: Cumulative Schemes [APP/6.4.2]**. Cumulative assessments within each of the technical topic chapters have been undertaken in accordance with the relevant |

| | | |
|---|---|---|
| | 2.2 The Applicant's assessment relies on "salami-slicing" the landscape - treating the 2,800 -acre subtraction as an isolated event. This ignores the reality of historical compounding.<br><br>2.3. Because massive swaths of the regional territory have already been permanently sequestered, the remaining open agricultural land surrounding Swaffham is a finite, scarce and critically vulnerable resource. | topic-specific guidance and best practice approach, assessing a reasonable worst-case scenario.<br><br>The Applicant does not agree that the approach taken in the EIA constitutes "*salami-slicing*". "*Salami-slicing*" is the process of dividing a single project into multiple projects, to avoid the need for undertaking an EIA; this is evidently not the case for the Scheme. As stated above, the Scheme has been assessed in-combination with the effects of other cumulative developments, as defined within the PINS Guidance; therefore, it is incorrect to state that the Scheme is being treated as an "*isolated event*". The Applicant's assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and PINS Advice Note on cumulative effects assessment, and the approach is detailed in full within **ES Chapter 2: EIA Process and Methodology [APP-051]** and **ES Appendix 2.4: Cumulative Schemes [APP/6.4.2]**. |
| LDO4 | 3.1 The STANTA Void and Air Defense Exclusionary Saturation (The Military Deficit)<br><br>• The Spatial Reality: The establishment of the Stanford Training Area (STANTA) in 1942 did not merely pause agriculture; it permanently excised 47 square miles (approximately 30,000 acres) of the Norfolk Brecks. By entirely evacuating five historic parishes (Stanford, Tottington, Langford, Sturston, and West Tofts), the State created a massive permanent territorial void.<br><br>• The Cumulative Argument: The Applicant's Environmental Statement treats the Swaffham corridor as an open landscape with endless capacity to absorb infrastructure. In reality, the Ministry of Defense has already locked up or heavily restricted a vast percentage of the regional territory for national security. Because the State has already permanently claimed these immense tracts of West Norfolk, the remaining independent arable land surrounding Swaffham is a finite premium. Forcing a further 2,800-acre industrial project (6,800-acre when including the High Grove Project) into this squeezed corridor represents an irrational over-saturation of national-tier land requirements within a single rural locality. | The Applicant's assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and PINS Advice Note on cumulative effects assessment, and the approach is detailed in full within **ES Chapter 2: EIA Process and Methodology [APP-051]** and **ES Appendix 2.4: Cumulative Schemes [APP/6.4.2]**.<br><br>As stated above, the Applicant acknowledges the concern regarding historic landscape change; however, the approach taken in the ES is in accordance with the requirements of Schedule 4 of the EIA Regulations. This stipulates the requirement of the ES to describe the "*current state of the environment*", i.e. the baseline scenario. The ES has appropriately assessed effects against the baseline scenario in accordance with the requirements of the EIA Regulations. The historic landscape of the area has, however, been a consideration in establishing the baseline conditions for **ES Chapter 6: Landscape and Visual [REP5-046]** and **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]**, to inform the value/sensitivity of the receiving environment to the Scheme. |
| LDO5 | 3.2 Monopolisation of Forestry Territory - The Thetford Forest Precedent<br><br>• The Spatial Reality: Spanning 72 square miles (over 46,000 acres), Thetford Forest is the largest lowland pine forest in England. Established by the Forestry Commission in the interwar period to address a national timber shortage, its creation permanently altered the agricultural potential of the region.<br><br>• The Planning Compounding: While most of the forest serves ecological and recreational purposes today, its historic establishment systematically blanketed a vast expanse of the Brecks landscape, pushing its structural boundaries directly up towards the Swaffham and South Acre corridors.<br><br>• The Cumulative Argument: The creation of England's largest lowland forest represents a massive, permanent state-directed conversion of Norfolk land away from agricultural food flexibility. When an environment has already given up 72 square miles yo single-use state forestry, and a further 47 square miles to army training, additionally with three large RAF and American air bases, the baseline has been fundamentally depleted. The Planning Inspectorate cannot lawfully evaluate the "acceptability" of loosing another 2,800 acres (or a combined 6,800 acres) of open arable land to industrial energy factories without factoring in that the local agricultural economy is already operating within a highly constrained territorial remnant. | The **Planning Statement [APP/5.5.3]** sets out the process taken for site selection, using the guidance set out in NPS EN-3. Paragraphs 2.10.28 to 2.10.34 of NPS EN-3 set out the preference for using non or lower grade agricultural land but accepts that land type should not be a predominating factor in site selection, that solar development is not prohibited on BMV, and that large-scale solar is likely to include some agricultural land. Appendix 1 of the **Planning Statement [APP/5.5.3]** concludes that the available land fits the factors explored by the Applicant and set out in NPS EN-3.<br><br>The Applicant has accounted for other/existing development locally in the ES by providing a cumulative assessment within each of the technical topic chapters following the approach set out within **ES Chapter 2: EIA Process and Methodology [APP-051]**. The Applicant has produced a **Report on Interrelationships between Projects [APP/8.3.3]** which sets out how the Scheme and High Grove Solar Farm are collaborating and details the control measures in place within the **draft DCO [APP/3.1.6]** for the Scheme. The Applicant has sought to continue monitoring other schemes with relevant cumulative effects, and refers to **ES Figure 2.1: Cumulative Schemes – Within 25km [APP/6.3.3]** and **ES Figure 2.2: Cumulative Schemes - Countywide [APP/6.3.1]** for the latest updates. |
| LDO6 | 3.3 Industrial Mineral Extraction Corridors - The Silica Sand Deficit<br><br>• The Spatial Reality: The geographic corridor running between Swaffham and Kings Lynn contains some of the UKs most critical deposits of high-purity silica sand (essential for industrial glass and ceramic manufacturing). Many decades of open-cast quarrying - notably around the Leziate, Bawsey, Mintlyn, and East Bilney complexes - have systematically hollowed out thousands of acres of the regional topography. | Section 8 of **ES Appendix 2.2: Scoping Opinion Response [APP-134]** covers minerals and waste. Paragraph 8.5 sets out that Mineral Planning Authority does not consider that the Scheme would result in the needless sterilization of safeguarded minerals and that, whilst not mentioned as a topic within the Scoping Report, mineral safeguarding can be (and was) accordingly scoped out of the Applicant's assessment. |

| | | |
|---|---|---|
| | • The Planning Compounding: Unlike standard aggregate quarrying, silica sand extraction requires deep. Long-term surface mining that fundamentally strips the topsoil, permanently alters complex sub-surface water tables, and frequently leaves behind deep water-filled voids. The area, including the Nar Valley, is pockmarked by large, water-filled 'lakes' as the consequence of 200 years of silica sand, gravel, and carstone mining.<br>• The Cumulative Argument: The industrial extraction has already fractured the historical landscape and permanently removed massive tranches of West Norfolk's terrain from traditional agricultural rotation. The Applicant's Environmental Statement treats the land resource around Swaffham as if it has an infinite capacity to absorb industrial degradation. In reality, the region has already paid a heavy territorial toll to supply the nation's industrial sand demands, with continuing long-term quotas required. Adding a 2,800-acre (or 6,800- acre) surface-covering solar array into an environment already scarred by vast mining voids creates an unacceptable cumulative concentration of heavy industrial land-use within a single rural district. | |
| LDO7 | 3.4 Hereditary Enclosure & Private Concentration - The 70% Territorial Lock<br>• The Spatial Reality: West Norfolk contains one of the most dense aggregations of major country estates in the United Kingdom. Dominated by sprawling holdings such as the Sandringham estate, Houghton Estate, Holkham Estate, and the immediate West Acre and Narford Hall Estates. Upwards of 70% of the land in West Norfolk remains privately held by a small number of generally hereditary landowners.<br>• The Planning Compounding: Because these historic estates are fiercely preserved under strict generational conservation mandates, environmental trusts, and private sporting interests, their massive internal borders are dynamically closed off to national and local utility and infrastructure placement.<br>• The Cumulative Argument: This creates a profound structural squeeze on the regional land market. Because 70% of the territory is effectively locked away from infrastructural development, national energy demands are disproportionately forced into the the narrow remaining slivers of independent tenant farmland and un-enclosed parcels surrounding communities like Swaffham, Sporle, South Acre, and Ashill. It is ironic that the land involved in the Droves Development is derived from the periphery of the Narford Hall Estate (if well away from Norford Hall) but this opportunistic exception does not change the territorial realities. The Planning Inspector must recognize that thee local community is operating under a unique spatial deficit: the public and independent agricultural sphere is being compressed between the "un-touchable" boundaries of the greater and lesser private estates on one side, and massive corporate energy developments on the other. The map of West Norfolk from the website, "Who Owns Norfolk" eloquently makes this point (Figure 2) | The **Statement of Need [APP-042]** sets out the policy support for large-scale solar as part of the government's plan to decarbonise the energy system. Section 2.9 of the **Statement of Need [APP-042]** summarises the UK Solar Roadmap and explains that solar is at the heart of the government's mission to make the United Kingdom a clean energy superpower. It is one of the cheapest and quickest to build power sources in the UK and offers huge potential to boost UK energy independence, bring down bills and tackle the climate crisis. Section 3.3 of the **Statement of Need [APP-042]** confirms that NPS EN-3 commits the UK to sustained growth in solar capacity to ensure that the country is on a pathway that allows it to meet net zero emissions. As such, solar is a key part of the government's strategy to deliver low-cost decarbonisation of the energy sector and the Government has established a capacity range of 45-69GW of solar power by 2035 to support the delivery of its aims.<br>Furthermore, paragraph 7.7.8 of the **Statement of Need [APP-042]** sets out that the proposed location is appropriate for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in the timeframes indicated. |
| LDO8 | 5.2 We formerly request that the Lead Inspector instruct the Applicant to submit a Supplementary Cumulative Impact Statement that explicitly factors in the historical, spatial, and structural land-loss pressures detailed in this addendum.<br>5.3 If the developer cannot prove that the regional ecosystem and agricultural economy can withstand the cumulative over-saturation, development consent must be refused.<br>5.4 We suggest that the Applicant's considerations cannot ignore the collective feasibility with the immediately adjacent High Grove proposal occupying an additional 4,000 acres. They are being proposed simultaneously, for a total sequestration of 6,8000 acres in a rural Swaffham environment and neighborhood already multiply constrained. | The Applicant's assessment of cumulative effects has been undertaken in line with the requirements of the EIA Regulations and PINS Advice Note on cumulative effects assessment, and the approach is detailed in full within **ES Chapter 2: EIA Process and Methodology [APP-051]** and **ES Appendix 2.4: Cumulative Schemes [APP/6.4.2]**. Cumulative assessments within each of the technical topic chapters have been undertaken in accordance with the relevant topic-specific guidance and best practice approach, assessing a reasonable worst-case scenario.<br>Further, the Applicant has provided the **Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land Quality [REP1-072]** and the **Update Note on Farm Impacts for Breckland Council (Appendix 1 of SoCG with Breckland Council [APP/5.11.4])**. These documents provide additional detail on the cumulative impact on agricultural land and farm impacts as a result of the Scheme. |

THE DROVES

SOLAR FARM