Closing statement at Deadline 6

Sporle with Palgrave Parish Council represented by [redacted] - [redacted]

Sporle with Palgrave Parish Council (PC) wish to make it clear that their position stated in their response to the Statutory Consultation has not changed. They are still opposed to the development on the basis originally set out in that document but in concluding their contributions to the Examination wish to point out the following reasons for their continued opposition to the Droves development.

Summary of reasons detailed below

1. *Wider cumulative impact*
   Lack of landscape capacity to take the amount of energy infrastructure already built and proposed. Not enough work done on the overall impact on communities affected as well as the wider county.

2. *Cumulative impact of High Grove*
   Uncertainty as to the ability to assess both projects due to the significant unknowns around connection and substations.

3. *Landscape and visual*
   The applicant has failed to acknowledge the local character of the landscape and the permanent loss of the open, tranquil nature of the landscape and its long views.

4. *RAF Marham PAR mitigation*
   What work has been done on this has been presented too late in the Examination for Interested Parties to assess properly. There has not been enough detail presented.

5. *National Grid substation*
   The implications of NGET eventually wanting a different site for the substation undermines the DCO application.

6. *Woodland within and adjacent to the site*
   A weakness in the Application because of the lack of control over woodland within or adjacent to the site yet outside the Order limits when it is vital for screening the Scheme.

7. *Stone curlews*
   New sightings recorded by [redacted] and the need for further surveys call into question the DCO application's adequacy and safety.

8. *Deer*
   Failure of the Applicant to engage fully with the concerns of movement of deer through the landscape and the risk of collisions on the A1065.

9. *Soils and BMV*
   Parish residents concern over food security and the 10 points made in representation made at OH2.

10. *Wild and battery fires*

The emergency response plan proposed in oOEMP rev 5 (REP5-066) does not meet the scale of the potential risk and problem. The implications for the Scheme design and management have not been looked at.

1. *Wider Cumulative Impact*

Much has been said by local MP's, local district councils and Norfolk County Council about the wider cumulative impact on the county caused by the large amount of renewable energy infrastructure already built and proposed.

Sporle with Palgrave is already impacted by the existing energy infrastructure including National Grid transmission line from Norwich to Walpole which passes through the north end of the parish. The parish is impacted by wind turbines at Swaffham and North Pickenham. The Necton developments under construction have an impact on Sporle parish as will the proposed Jafa development on the edge of the Dunhams.

The PC pointed out at ISH1 under agenda point 3.3 that App-068 figure 2.1 only showed the High Grove scheme within the 25km circle. When this plan was revised at Deadline 1 (REP1-042) hardly anything had changed. Again, a countywide cumulative map was submitted by the Applicant at Deadline 3 (REP3-040) which shows only the addition of the East Pye development. This has since been backed up by a revised Report on Interrelationships between Projects (REP5-072) which does show a map including the Norwich to Tilbury gridline project.

However, the PC did put to the ExA at ISH1 that a more strategic look at the cumulative impacts of all the renewable developments proposed within Norfolk should be undertaken in his examination. At no time was the Shipdham airfield battery and solar project shown on these maps nor Beeston. The PC would contend that a full appraisal has not been undertaken or sufficient weight given to the impact of all the existing infrastructure as well as that proposed; whether an application has been made or is in the public domain, or an application yet to be forthcoming, whether via the LPA or through the DCO route.

It is noted that the National Grid transmission line from Norwich to Walpole is attracting further interest from developers and further renewable energy projects are proposed to the west of the Site. This will only increase and is of great concern to local communities across the county such as Sporle.

At the heart of this concern is the question – does the landscape have the capacity to take all this development? Breckland District Council have already made this point and stated their final position in their recent SoCG with the Applicant (REP5-012) – ref BC-1. The PC has already stated their position that they do not believe the landscape does have the capacity (REP5- 082) and agree with the BDC that the Applicant has not sufficiently answered the question. It would appear that there is an unwillingness to provide, on these cumulative maps, the spatial information for a full examination of this concern.

The PC therefore consider that the ExA should not recommend this application on the basis that not enough work has been done on the overall impact on communities, such

as Sporle, in the vicinity of transmission lines, as well as the wider county in light of the large amounts of energy infrastructure being built or proposed.

2. *Cumulative Impact of High Grove*

The PC, in all its representations, has shown its concern over the impact of both the Droves and High Grove schemes which border each other along the A1065; with both projects occupying land within the Parish boundary. They are intervisible, both will affect traffic on the A1065, both will impact local wildlife and biodiversity and both will impact the same stretch of landscape which is an open tranquil area with long views. Views that can take in several fields of solar arrays belonging to both projects.

The PC is appreciative of the ExA's concern and willingness to examine the issues and the Applicant's work to try and overcome some of the issues. The PC has been appreciative of the willingness of both High Grove and the Applicant to discuss these.

The PC recognise that High Grove is still at the PEIR stage and is not likely to submit a DCO application before late Q1/early Q2 in 2027. The PC also recognise that the High Grove DCO application may significantly change the current design of the scheme due to the substation location, which is yet to be decided.

It is recognised that if the Droves DCO is approved then High Grove will have to adapt their design to that. Also, that the oLEMP seeks to ensure that the Droves will work to create a smooth transition between the schemes.

The main concern in relation to High Grove has been landscape and visual. The PC is disappointed at the failure of the Applicant, for which they were asked at ISH3, to produce photomontages and photowire images that show the cumulative impact of High Grove alongside the Droves even if High Grove is still at PEIR stage. This is particularly relevant in relation to Viewpoint 8 and Viewpoint 17 for which the photographs do not reflect the wide sweep of the view which will be impacted by both projects. Which, in the case of the latter viewpoint, was clearly demonstrated to the ExA on the ASI.

This would have enabled the ExA to make a better assessment of the likely cumulative landscape and visual impacts.

However, whether the ExA can make an assessment of the cumulative impacts of both projects with any degree of certainty must be in doubt with both projects uncertain where their respective substations will be located and when connections will be granted in addition to High Grove submitting a DCO application. The PC therefore considers that the ExA cannot safely recommend this application for approval on the basis that there are still significant unknowns with both projects.

3. *Landscape and Visual*

The PC still objects to the Scheme on the basis of the considerable alteration to the existing landscape character and the visual impacts of large areas of solar arrays.

The area that encompasses the site is characterised by open, tranquil landscape with long views. It is largely sloping land, particularly on the eastern side as experienced by VRG4 with views sloping in the distance to treed horizons.

It might be the case that the area is not defined nationally as important landscape. However, it is indicative of the Applicant's approach of not paying sufficient care to local concerns for this landscape in its selective approach to GLIVIA3, its failure to drill down

into the changes to the landscape since the development of Breckland's LCA's and therefore failure to produce a more localised landscape character assessment of the site and its surrounds, thereby under representing its experiential, perceptual and recreational value.

Despite the PC's attempt to assist the Applicant with possible mitigations of hedging and tree belts, particularly in relation to the possible substation site, it has become clear that the sloping nature of the terrain will not mitigate sufficiently the visual impact of the sub station (unless the base levels are dropped significantly), nor the higher ends of fields 14, 15, 23, and the fields alongside the A1065 as seen from VRG4 – particularly Viewpoints 8 and 17.

These mitigations will, as BDC maintain in their SoCG (REP5-012) position BC4-9, will result in the loss of the open and long views. The PC would agree with this, particularly in relation to the use of PRoW within and outside the Site. Even if the project operates for 60 years and is then decommissioned, the mitigation will not be, so resulting in the permanent loss of these open and long views. The PC agrees with BDC that this has not been fully acknowledged by the Applicant.

Again, the PC would want to question whether the landscape has the capacity to take the proposed development particularly in conjunction with High Grove.

4. *RAF Marham PAR Mitigation*

The PC notes that the DIO submitted their objection to the Droves application on 27th February 2026. It has taken till Deadline 5 of the Examination for other Interested Parties to have anything like an idea of the mitigation proposed to overcome the issues raised with the PAR. It is now known that it could be bunds and/or fences that will provide the mitigation but little is known where they will actually be sited in the areas designated as being a problem to the PAR. There is only a possible design cross section shown in Appendix 1 of Written Summary of Applicant's Oral Submissions to Action Points (REP4-035). It is noted that the provisions in the draft DCO prevent them from not being higher than 4.5m.

The Applicant has stated that this will not materially affect the LVIA, presumably on the basis of the maximum height.

The PC is critical of the fact that this issue was not looked at by both DIO and Applicant in the build up to submitting the DCO application as surely the potential issues should have been known and could have been incorporated in the relevant chapters of the ES.

The information has come in so late into the Examination process and not in a form that can be readily assessed with any degree of certainty, but relying on the various outline management plans to regulate it into the detailed design stage and approval from the MOD and LPA, if the DCO is granted.

The area requiring mitigation is still a significant proportion of the whole Site which surely brings the relevance of the current LVIA into doubt, particularly as the actual position of any bund or fence is not defined. It could be the case that if the Applicant uses 3m high fixed arrays with 4.5m high fences to enable the mitigation to work, that there will be a more significant impact on the landscape and visual amenity as there could be lines of solid fencing visible above the arrays, particularly as the mitigation areas slope up away from River Road.

The possibility of using bunds has already identified issues affecting drainage and flood risk as raised by the LLFA, apart from the impact of the physical size on the landscape. There has not been enough work done to assess the impact of any bund that is to be constructed.

Should agreement not be reached on the detail design with the DIO the Applicant's willingness to remove solar arrays from the mitigation areas must bring into question the commercial viability of the Scheme as a significant area will not be generating electricity.

Therefore, the PC would contend that there is far too little known of the impact of the mitigation for the ExA to safely recommend that a DCO be granted.

5. *National Grid Substation*

It is clear from the revised SoCG with NGET (REP5-021) that due to the Gate 1 status of the project that NGET are not developing any proposals for the new substation with the potential that the site may not be where the Applicant proposes in its DCO application.

The current site in field 27 would represent the most obvious position for the substation as it is close to the transmission line and enables it to be mitigated in part (depending on base levels) with existing landscape form, hedges and trees as well as Bartholomew's Hills. It is noted that the Applicant has used National Grid's methodology for site selection.

However, it could be the case that the NGET may decide that the location proposed by the Applicant is not satisfactory for their purposes. This would have very significant consequences for the Scheme.

If the NGET decide that the site should be still inside the Order Limits and on field 35, as was originally suggested; whilst being close to the transmission line with minimal changes to the infrastructure, it would present significant challenges to the existing application and the ES particularly in terms of the LVIA, and on the heritage assets. It would result in significant design changes and would not be the Scheme as presented at application.

To move outside the Order Limits would involve changes to the design of the Scheme in terms of connection into the substation from the customer substation. It is noted that the delay in submitting a DCO application by High Grove is due to them being reliant on the NGET selecting a site which will need LPA approval and not included in their DCO as it stands presently. The siting of this substation could result in major changes in their scheme design for the it to remain commercially viable.

If the eventual NGET proposed substation is outside the order limits it could be sited alongside the transmission line further along either westwards or eastwards which would have serious impact on the significant landscape and historical assets such as along the Nar valley. This would have an impact on the Scheme design in terms of layout meaning that the current ES becomes irrelevant to the revised design and would need looking at again.

Therefore, the PC contend that the implications of a required change of substation site by NGET undermines the clarity of the DCO application and therefore make it difficult for the ExA to safely recommend the grant of a DCO.

6. *Woodland within and adjacent to the site*

The PC along with others has been concerned that there are no means within the draft DCO to ensure the management and retention of woodland outside of the Order Limits yet inside the site or adjacent, such as Bartholomew's Hills. It is a weakness of the Application that there is no means of controlling these large areas of woodland vital to the maintenance of screening and visual mitigation of the Scheme.

It is recognised that the Applicant will not have control of these areas, that the DCO cannot control them and that the only way of controlling them, apart from the landowner's goodwill and management, is through the application of a TPO, which does not necessarily improve the management of the woodland.

The 60-year operational life of the Scheme means that there could be significant risk to those areas of woodland such as Batholomew's Hills if there are changes in landowner or policies towards woodland for which the DCO will have no control over and thereby threaten the landscape and visual impact of the Scheme as well as likely impacts on the wildlife and biodiversity.

7. *Stone curlews*

[redacted] in his representations has raised his concern that there are Stone Curlews nesting on the site. He states his latest findings in his representation to Deadline 5 (REP5-091). The PC contends that these latest findings and the need for '*at least 3 sequential years of Stone Curlew survey work'* undermines the bird survey work already undertaken for the DCO application and calls into question its adequacy and safety.

A failure to undertake further surveys in and construction were to proceed, with Stone Curlew nesting found to be present, would present the Undertaker with considerable problems in delay and costs. Work would have to cease from anywhere in at least a 650m radius as well as the possible criminal proceedings if nests were disturbed.

The PC therefore considers the finding of Stone Curlews on the site makes the DCO application untenable for if the 3 years of surveys continue to show nesting over the site, or parts of it, the Scheme's viability is questionable.

8. *Deer*

The PC has consistently pressed for measures to control deer across the site and in combination with High Grove to prevent the danger of accidents caused on the A1065. They have called for survey work to be undertaken to assess the level of deer numbers in the landscape.

At ISH2 the PC welcomed the revision of Design Principals, Parameters and Commitments at Deadline 3 (REP3-026) in relation to deer fencing along the A1065 in an attempt to encourage deer to move away from the road. Three questions were asked in relation to this. The first was: '*Has the Applicant sort professional advice from those whose expertise is in the movement of deer through the landscape.'* The Applicant's representative said these questions would be answered in writing. The PC has certainly not seen an answer to this first question. This leads the PC to the following conclusion.

It would be reasonable to assume that the Applicant would seek professional advice from numerous consultants and experts in the wide number of topics covered in the ES as was seen in those who were present at public hearings. However, one can only draw the conclusion that a deer consultant was not included.

It is recognised that deer are not a scheduled species but they are found in large numbers across much of our landscape generally. The PC contends that the failure to engage with this concern and provide both Interested Parties and the ExA with solid data on deer numbers and expertise in this area weakens the Applicant's work in ES chapter 7.

9. *Soils and BMV*

The PC would still want to reiterate that the one area which always comes up when talking to parish residents about mega solar is their worries about food security. The PC would reflect that and continues to object to this application on that basis and would draw the ExA's attention to the 10 points made in the PC's oral representation at OH2 (REP4-046).

10. *Wildfires and battery fires*

The PC at ISH3 agenda 3.3 (REP4-052) expressed its concern of the increasing likelihood of wild fires, the potential for battery fires and the need for the Applicant to strengthen its outline management plans. The PC was appreciative of ExQ3 16.0.1 that asks the Applicant to review its assessment of the relevant paragraph in NPS EN-1 and to include how this risk would be mitigated.

It is noted that in the oOEMP revised for Deadline 5 a single paragraph (2.17.1) (REP5-066) has been inserted. This speaks of an emergency response plan, which while welcome, does not do justice to the potential scale of the problem.

This only refers to a 'response' plan. There has been no work done to assess whether this has implications for the design of the project and its operational management. This means that the oOEMP is too weak and therefore undermines the adequacy and safety of the DCO application.