

RWE

High Grove Solar Programme Document

November 2025

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1. Introduction

1.1. Purpose of the Programme Document

- 1.1.1.1. RWE Renewables UK Solar and Storage Ltd (the Applicant) has prepared this Programme Document for High Grove Solar, a proposed solar farm with co-located Battery Energy Storage Systems (BESS) (the Proposed Development) in Breckland, Norfolk.
- 1.1.1.2. The Proposed Development would have a capacity of over 50 megawatts (MW) and is therefore classified as a Nationally Significant Infrastructure Project (NSIP). This means an application for a Development Consent Order (DCO) must be submitted under the Planning Act 2008 (the Act) to obtain consent for the project.
- 1.1.1.3. This Programme Document has been prepared in accordance with the PINS Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (PINS Pre-application Prospectus)[1]. As the Proposed Development was registered with PINS prior to 1 November 2025, it has not been prepared in the new programme document template introduced by PINS on 22 October 2025 for use on projects registered after 1 November 2025.
- 1.1.1.4. The content of the document has also been informed by the Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects Guidance on the pre-application stage for Nationally Significant Infrastructure Projects published on 30 April 2024 (The Guidance) [2].
- 1.1.1.5. Paragraph 008 of the Guidance states that the purpose of the Programme Document is to set:
- ‘out the intended programme for the pre-application stage and what work and studies are required for the preparation of an application.’*
- 1.1.1.6. The content of the document has also been informed by the Guidance Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects Guidance on the pre-application stage for Nationally Significant Infrastructure Projects published on 30 April 2024 (The Guidance) [2]. Paragraph 010 of the Guidance states that:
- ‘The Programme Document is not a statutory requirement and is not for consultation apart from agreement with the Planning Inspectorate. It should set out the timetable and activities necessary for an effective pre-application process including the level of pre-application services from the Planning Inspectorate, and consultation with various parties required under the Planning Act.’*

The Programme Document should include:

- *the date the applicant intends to submit their application;*
- *a comprehensive timetable of the applicant's pre-application process, the main events with dates and milestones demonstrating how the pre-application process will be completed (using the maximum target of 2 years as a benchmark);*
- *the applicant's view on the main issues for resolution and activities they will undertake to address those;*
- *the applicant's proposals for engaging with statutory consultees and local authorities during the pre-application period and any intended financial support agreements, such as Planning Performance Agreements (PPAs);*
- *the applicant's identification of risks to achievement of the pre-application stage and the process by which these risks are tracked and managed; and*
- *cross references to the SoCC [Statement of Community Consultation] required by section 47 of the Planning Act.*

1.1.1.7. Finally, this document has been informed by feedback from the Planning Inspectorate, as provided in their Section 51 advice in November 2024¹.

1.1.1.8. The Applicant has not shared this document with any specific stakeholders, but notes that it will be available for viewing on the project website. The contents of this document have also informed the materials used for the activities outlined in Stages 1 – 4.

1.1.1.9. This Programme Document provides the information requested above. It is a live document and will be regularly monitored and updated throughout the pre-application process.

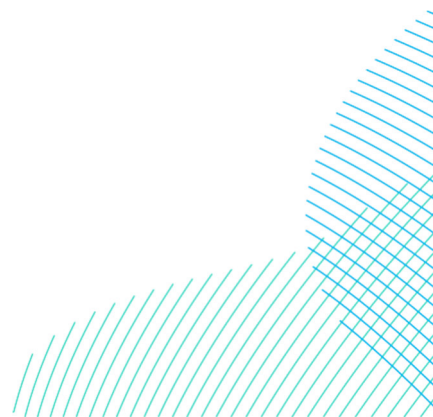
1.2. The Applicant

1.2.1.1. The Applicant is RWE Renewables UK Solar and Storage Limited, a leading solar and battery energy storage developer with one of the largest development pipelines in the UK. RWE Renewables UK Solar and Storage Limited is a subsidiary of RWE AG, which has more than 125 years of energy expertise, through design, construction, and operation. It is RWE AG's ambition to have a carbon neutral energy portfolio by 2040, providing clean, secure, and affordable energy to millions of households

¹ Available on the Planning Inspectorate's website: [Section 51 Advice Log](#).

1.3. The Proposed Development

- 1.3.1.1. The Proposed Development consists of a solar farm capable of generating over 50MW Alternating Current (AC) of electricity with co-located BESS, located in the vicinity of Swaffham and Dereham in the county of Norfolk.
- 1.3.1.2. The Proposed Development comprises a number of Panel Areas. Panel Areas are defined as an area within the draft Order Limits that contain a group of solar PV modules. The Proposed Development will also involve the development of a number of 132kV substations and a series of underground cables to connect the elements of the Proposed Development to one another. A range of supporting infrastructure is also required, including a BESS; transformers and inverter, storage containers and security measures such as fencing, closed circuit television (CCTV) and lighting.
- 1.3.1.3. The Proposed Development will also include environmental mitigation and enhancement measures to avoid, reduce, mitigate and compensate for the impacts on the surrounding environment and nearby communities.
- 1.3.1.4. A new 400kV substation will also be required to connect the Proposed Development into the national electricity transmission network. This substation is being developed and consented separately by National Grid and does not form part of the Proposed Development.



2. The Programme Document

2.1. Milestone programme

2.1.1.1. In accordance with Paragraph 010 of the DLUHC Pre-application Guidance, the key milestone programme is set out below.

Table 1: Key milestone programme

Activity / Milestone	Timescale
Environmental surveys	April 2024 – March 2026
Stakeholder engagement	June 2024 – completion of construction
Environmental Impact Assessment (EIA) Scoping Report submission	September 2024
Non-statutory Consultation	September 2024 – October 2024
Statutory Consultation	April – June 2025
Adequacy of Consultation	January 2026
DCO application submission	April 2026

2.2. Main risks to the pre-application stage programme

2.2.1.1. The Applicant currently considers the following to be the main risks to the key milestone programme:

- National Grid determining a location for the substation that has not previously been considered, resulting in a need for additional surveys and/ or consultation on the grid connection cable route.
- Need for additional and unanticipated environmental surveys delaying the submission date. This could occur due to:
 - Results of initial surveys indicating a requirement for more or different surveys (e.g. ecology or archaeology); or
 - Requirement for surveys on areas of land not previously surveyed due to a change to the development proposals.
- Changes to policy and/ or legislation introducing new or different requirements for the application.

2.2.1.2. These risks are being monitored and managed through the pre-application process through a risk register, which is reviewed regularly by the multi-disciplinary team. The Applicant will also report on any risks to the programme during meetings with the host authorities and the Planning

Inspectorate. This document will be updated should any changes occur to the key milestone programme.

3. Main issues for resolution

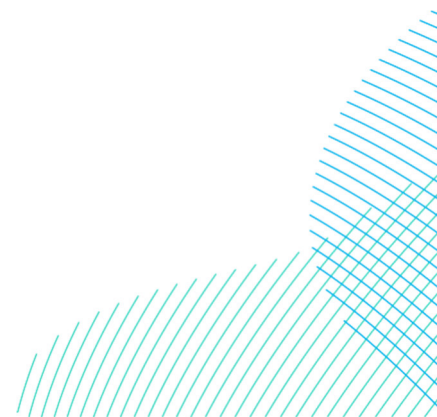
- 3.1.1.1. At this stage, the Applicant considers that the potential matters set out in the Table 2 below are likely to be the main issues for resolution. It is the Applicant’s intention to resolve the issues prior to the submission of the DCO application as far as possible.
- 3.1.1.2. The Applicant notes the provision of an Issues Tracker in the PINS Pre-application Prospectus. Where practicable, the Applicant intends to engage with relevant stakeholder organisations via Statement(s) of Common Ground (SoCGs) and a Statement of Commonality (SoC), which will provide an account of the principal issues between the Applicant and the relevant organisation. These will be developed throughout the pre-application stage, and made available alongside the application for development consent.

Table 2: Main issues for resolution

Potential issue	Potential effect	Applicant’s proposed resolution
Landscape and visual impacts	<p>Potential impact on landscape character and visual receptors.</p> <p>Receptors that could be affected include, but are not limited to:</p> <ul style="list-style-type: none"> - Residents - Castle Acre scheduled monument (3km north of Order Limits) - Footpaths, including Peddars Way and Norfolk Coast Path National Trail 	<p>Completion of early Landscape and Visual Appraisal to identify areas of higher and lower sensitivity.</p> <p>Preparation of Landscape and Visual Impact Assessment as part of Environmental Statement (ES) including identification of necessary mitigation and engagement with key stakeholders.</p> <p>Design of project and mitigation planned to address impacts where possible.</p>
Best and Most Versatile (BMV) Land and Agriculture	<p>Potential effects on BMV land.</p>	<p>Completion of agricultural land surveys to determine the grading of agricultural land. Design and layout of project to minimise effect on BMV land.</p> <p>Impacts on current agricultural uses minimised as far as possible.</p>
Biodiversity	<p>Potential adverse effects on species on site, including bird species such as stone curlew and Skylark.</p> <p>Potential positive impact on biodiversity through planting on site resulting in biodiversity net gain (BNG).</p>	<p>Completion of Phase 2 species specific surveys, development of mitigation and enhancement strategy and engagement with key stakeholders including Natural England and the county ecologist. Identification of opportunities for BNG.</p>



Potential issue	Potential effect	Applicant's proposed resolution
Cumulative effects	Potential cumulative effects of Proposed Development in combination with other nearby schemes.	Review of nearby developments and consideration of collaborative working to reduce effects. Preparation of cumulative effects chapter as part of ES, of which the scope is subject to engagement with LPAs and other statutory stakeholders.
Grid connection	Location of the 400kV substation to connect the Proposed Development to the national electricity transmission network, or grid, is under consideration and is yet to be defined.	Continue to engage with National Grid to understand their requirements and ensure relevant effects are included within the EIA. Applicant to consider potential locations that may result in lower impacts.
Construction effects	Potential effects on local receptors during construction.	Preparation of Outline Management Plans to be consulted on and then submitted with the DCO application.



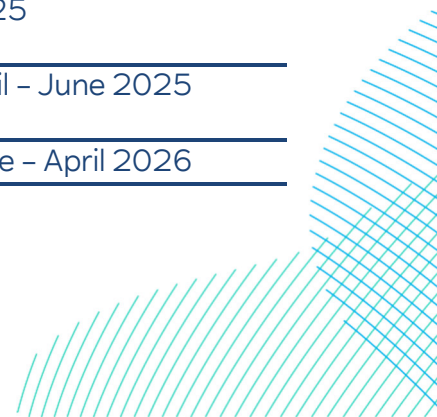
4. Pre-application stages

4.1. The Approach to Consultation

- 4.1.1.1. Engagement and consultation with the community, affected land interests and consultees is critical to development of the project. Engagement with key initial consultees started prior to the production of this document and will continue until after a decision on the application. In addition to ongoing activities, there have been two main stages of consultation prior to submission of the application; ‘Non-statutory Consultation’ and ‘Statutory Consultation’.
- 4.1.1.2. Non-statutory consultation, which took place in September-October 2024, provided the opportunity to present and introduce the Proposed Development to local communities. Importantly, it was carried out at an early stage to provide an opportunity to influence design, but also when sufficient information was known about the Proposed Development to enable meaningful consultation.
- 4.1.1.3. The Statutory Consultation (under Section 47 of the Act) was carried out in parallel with consultation with technical and prescribed organisations (under Section 42), including local authorities (Section 43) and land interests (Section 44). This phase of consultation involved the publication of a Preliminary Environmental Information Report (PEIR), which provided information on the proposals and associated positive and adverse impacts.
- 4.1.1.4. This Programme Document sets out the proposed programme and consultation activities under the following key pre-application stages:

Table 3: Pre-application stages

Stage	Period	Indicative Timescale
Stage 1: Project Launch and environmental surveys	Introduction of Proposed Development with key statutory and political consultees, and community representatives. Undertaking of early environmental surveys to shape the design of the Proposed Development.	March – September 2024
Stage 2: Non-statutory Consultation and EIA Scoping	Submission of the EIA Scoping Report and Non-statutory Consultation period. Further environmental surveys as required.	September – October 2024
Stage 3: Pre-Statutory Consultation	Close of Non-statutory Consultation – launch of Statutory Consultation. Further environmental surveys as required.	October 2024 – Q1/Q2 2025
Stage 4: Statutory Consultation	Statutory Consultation period. Further environmental surveys as required.	April – June 2025
Stage 5: Pre-submission	Close of Statutory Consultation –	June – April 2026



	submission of DCO application. Further environmental surveys as required.	
Stage 6: Submission	Submission of DCO application	April 2026

4.2. Stage 1: Project Launch and environmental surveys

- 4.2.1.1. The Project Launch stage of the pre-application programme ran from the inception of the Proposed Development in March 2024 to the launch of Non-statutory Consultation, which took place between September – October 2024. The following activities were undertaken during this stage.
- 4.2.1.2. A full account of the communications and engagement activity which took place during the Project Launch stage were be made available as part of the Non-Statutory Consultation Report which was published alongside the Statutory Consultation materials, and will be made available as part of the future DCO application.

4.2.2. Environmental surveys

- 4.2.2.1. The following environmental surveys were initiated during this stage:
- Ecological surveys;
 - Preliminary ecological appraisal
 - Badger
 - Bats
 - Birds
 - Great Crested Newts
 - Otter and water vole
 - Arboricultural surveys;
 - Agricultural land classification and soil surveys;
 - Geophysical survey;
 - Landscape survey / viewpoint photography; and
 - Noise survey.
- 4.2.2.2. These surveys started in stage 1 but were not completed in this stage. This is owing to seasonal constraints, and the duration of time of which data need to be collected to support the Environmental Impact Assessment.

4.2.3. Landowner engagement

- 4.2.3.1. The Applicant has obtained all land required for the Proposed Development voluntarily and has agreements with landowners affected by the solar and BESS elements of the Proposed Development. There will be a requirement for rights outside these areas to enable installation of grid connection

infrastructure. Given that optioneering for these elements of the Proposed Development are ongoing, there is the potential for additional landowners to be affected by these elements. The Applicant has engaged and will continue to engage with these landowners as these elements of the Proposed Development evolve. The Applicant has briefed all relevant landowners ahead of each stage of consultation that has occurred so far. The Applicant will fully brief the affected landowners prior to the submission of the DCO application, and any other key project milestones.

4.2.4. PINS engagement

- 4.2.4.1. An Inception Meeting with PINS was held on the 30 May 2024 and during this the Applicant introduced the Proposed Development, activities undertaken to date, the consenting programme, planned activities and the intended submission date.
- 4.2.4.2. Engagement will be ongoing throughout the pre-application period, during update meetings and receipt of Section 51 advice.
- 4.2.4.3. Section 51 advice provided by the Inspectorate will be available on the project website.

4.2.5. LPA and prescribed consultee engagement

- 4.2.5.1. The Proposed Development is entirely located within the administrative boundaries of Breckland Council and Norfolk County Council.
- 4.2.5.2. The Applicant undertook initial project briefings with both host authorities and has since set up monthly project review meetings with the relevant planning, infrastructure and/or environment officers. These meetings are an opportunity for the Applicant to provide an update on the progress of the pre-application stage, and for the host authorities to raise any queries they may have.
- 4.2.5.3. The Applicant will engage with prescribed consultees as appropriate, including engaging throughout the EIA process.

4.2.6. EIA Scoping Report

- 4.2.6.1. In accordance with Regulation 8(1)(b) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations), the Applicant confirms that an ES will accompany the DCO application.
- 4.2.6.2. An EIA Scoping Report was prepared to support an application for a Scoping Opinion from the Secretary of State for the Department for Energy Security and Net Zero (DESNZ), for the purposes of Regulation 10 of the EIA Regulations.



- 4.2.6.3. The Applicant submitted the EIA Scoping Report to PINS in September 2024. The purpose of the EIA Scoping Report is to establish the scope, including content and extent of matters which should be covered in an ES to be prepared and submitted for the Proposed Development. The EIA Scoping Report was prepared in accordance with PINS Advice Note Seven [3] for all environmental factors (topics) set out in the EIA Regulations.
- 4.2.6.4. Following consultation, PINS adopted and published their EIA Scoping Opinion on 17 October 2024. Since that date, the Applicant has sought to engage with PINS and other organisations who provided feedback to that consultation, and take into account comments received as part of the EIA.

4.2.7. Political engagement

- 4.2.7.1. Further to the formal consultation periods, the Applicant has and will continue to engage with relevant political representatives, including host ward councillors and parish councils. This engagement formally began when the Applicant notified them that the EIA Scoping Report has been submitted to PINS and provided them with advance notice of the public launch of the Proposed Development.
- 4.2.7.2. The Applicant acknowledged that some of the stakeholders written to as part of that process are also representatives of bodies that are considered to be prescribed consultees. These consultees were contacted both as part of the Non-statutory Consultation and consultation on the Scoping Report. In recognition of the fact that this may cause confusion, the Applicant provided, as part of the non-statutory consultation materials, an explanation of the two processes, including their purpose and what feedback is being sought in response to each request.
- 4.2.7.3. Following the General Election on the 4 July 2024 the Applicant was in regular communications with the elected Members of Parliament (MPs) and has continued to be in regular communications with the elected officials. Similarly to other political representatives, this began with a notification relating to the submission of the EIA Scoping Report and the formal Project Launch. The Applicant then carried out initial project introductory briefings with the two MPs within whose constituencies the project would be located.

4.2.8. Community engagement

- 4.2.8.1. In addition to political representatives, the Applicant has also undertaken desk-based research to identify non-prescribed groups and organisations that represent members of the local community with an interest in the proposals. This includes gateway organisations representing those with characteristics that may mean they are otherwise less likely to participate in community consultation exercises.

4.2.8.2. The Applicant directly notified these representative groups of consultation opportunities prior to the launch of the Non-statutory Consultation.

4.2.8.3. Prior to the start of the Non-statutory Consultation the Applicant also published a press release and mail out a project leaflet introducing the Proposed Development to the wider community, both of which provided details of the upcoming Non-statutory Consultation for the community.

4.3. Stage 2: Non-statutory Consultation

4.3.1.1. The Non-statutory Consultation stage of the pre-application programme ran from September – October 2024.

4.3.1.2. This was the first time in the programme that members of the public were formally be notified of the Proposed Development and their views sought.

4.3.1.3. The purpose of this Non-statutory Consultation was to:

- Proactively introduce the Applicant and Proposed Development by sharing information about the emerging proposals.
- Provide communities with an early opportunity to share their views and local knowledge. The feedback received will inform design development and evolution of the proposals.
- Assess the effectiveness of various consultation activities, which will be considered when preparing a Statement of Community Consultation (SoCC) prior to Statutory Consultation.
- Build confidence in the consultation process and relationships with stakeholders early on.

4.3.1.4. A full account of the communications and engagement activity which took place during the Non-statutory Consultation stage was made available as part of the Non-Statutory Consultation Report, and was published alongside the Statutory Consultation materials. It will also be made available as part of the future DCO application.

4.3.1.5. Environmental surveys were also undertaken during this stage.

4.4. Stage 3: Pre-Statutory Consultation

4.4.1.1. The Pre-Statutory Consultation stage of the pre-application programme ran from the close of Non-statutory Consultation in October 2024 to the launch of Statutory Consultation in April 2025.

4.4.1.2. Environmental surveys and landowner engagement continued during this stage shaping the design of the Proposed Development before the start of the Statutory Consultation.



4.4.2. PINS engagement

- 4.4.2.1. Following receipt of the EIA Scoping Opinion and close of Non-Statutory Consultation, a post-Scoping / pre-section 42 consultation meeting took place.
- 4.4.2.2. The purpose of this meeting was to discuss the outcomes of the EIA Scoping Opinion and raise any relevant questions, but also for the Applicant to provide PINS with an update on the lessons learnt from the Non-Statutory Consultation exercise.

4.4.3. LPA and Prescribed Consultee Engagement

- 4.4.3.1. Following the close of the Non-statutory Consultation and receipt of the EIA Scoping Opinion, a series of post-Scoping meetings took place with the LPA and prescribed consultees as appropriate to discuss the outcomes of the EIA Scoping Opinion. These meetings provided both parties to raise any relevant questions, and seek clarification where required.
- 4.4.3.2. In advance of the Statutory Consultation the Applicant developed and consulted with the host LPAs on a draft SoCC, which was informed by experience and feedback from Non-statutory Consultation. The SoCC set out how the Applicant intended to undertake Statutory Consultation.
- 4.4.3.3. Additional meetings during this period were also arranged to discuss the next design iteration for the Proposed Development and seek relevant views. An account of these meetings, the feedback received and how these discussions influenced the design of the Proposed Development will be made available in the Applicant's Design Approach Document as part of the DCO application.

4.4.4. Political and community engagement

- 4.4.4.1. The Applicant's free-to-use communications channels and dedicated project website remains live in between phases of consultation, for anyone interested in the proposals to find out more information and contact members of the project team.
- 4.4.4.2. The project website includes a page of Frequently Asked Questions (FAQs), which will be updated in response to comments and enquiries received during and following Non-statutory Consultation.
- 4.4.4.3. In preparation for the Statutory Consultation, the Applicant engaged with relevant political representatives, including host ward councillors, parish councils and the relevant MPs. This included offering briefing sessions prior to the launch of the Statutory Consultation, as well as dedicated engagement during the Consultation itself.

4.5. Stage 4: Statutory Consultation

4.5.1.1. The Statutory Consultation stage took place between April and June 2025.

4.5.1.2. This defined phase of Statutory Consultation was held to consult prescribed consultees, land interests, and the community. Further to the main events, dedicated meetings may be held with particular prescribed consultees.

4.5.1.3. The purpose of this Statutory Consultation stage was to:

- Provide further information to the statutory consultees as well as the communities on the design of the Proposed Development and how the design had evolved following the Non-Statutory Consultation stage.
- Provide initial environmental survey information that has been completed, this information was presented within the Preliminary Environmental Information Report (PEIR).
- Gather feedback on the more developed proposals.
- Provide community facing materials, such as leaflets and event displays.
- Continue communication with members of the community and key stakeholders.

4.6. Stage 5: Pre-submission

4.6.1.1. The Proposed Development is currently at this stage.

4.6.1.2. The Pre-submission stage of the pre-application programme is currently targeted to run from the close of Statutory Consultation to the submission of the DCO application in April 2026.

4.6.1.3. Environmental surveys and landowner engagement will continue to be undertaken in this stage.

4.6.1.4. The following activities will also be undertaken during this stage.

4.6.2. PINS engagement

4.6.2.1. Following the close of Statutory Consultation a meeting was held with PINS to discuss the outcomes of the Statutory Consultation and to enable both the Applicant and PINS to raise any relevant questions.

4.6.2.2. A further meeting with PINS will also be requested during this period to ensure the Adequacy of Consultation Milestone will be achieved. The request for a meeting will be issued alongside a written submission by the Applicant which establishes the consultation undertaken to date, confirms the approaches set out in the SoCC and summarises the consultation responses

and the way in which they are shaping the application. It will also, where relevant and practicable, include the views of the Applicant's approach to consultation as provided by the LPAs.

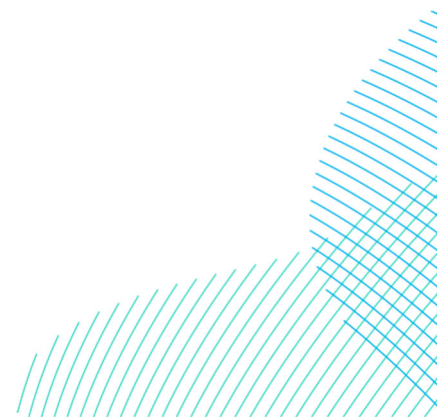
- 4.6.2.3. This meeting will be held no later than 1 month prior to the submission of the DCO application.

4.6.3. LPA and Prescribed Consultee Engagement

- 4.6.3.1. Prior to the submission of the DCO Application, the Applicant will engage with the LPAs and prescribed consultees where appropriate to seek their views on the adequacy of consultation undertaken. Other meeting(s) will continue during this period and Statements of Common Ground will be progressed where appropriate.

4.7. Stage 6: Submission

- 4.7.1.1. The submission of the DCO application to PINS is currently targeted for April 2026.
- 4.7.1.2. Alongside the submission of the DCO application to PINS, the Applicant will notify the LPA and statutory consultees of the submission of the application.



5. References

- [1] Planning Inspectorate, “Guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus,” May 2024. [Online]. Available: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>. [Accessed November 2025].
- [2] Department for Levelling Up, Housing and Communities, “Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects,” April 2024. [Online]. Available: <https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects>. [Accessed January 2025].
- [3] Planning Inspectorate, “Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment,” 2020. [Online]. Available: <https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-an>. [Accessed January 2025].

