



The countryside charity
Norfolk

15 Pigg Lane
Norwich
NR3 1RS

Telephone: 01603 761660
Email:
planning@cprenorfolk.org.uk

www.cprenorfolk.org.uk

Working locally and nationally to promote, protect and enhance a beautiful and thriving countryside for everyone's benefit.

To: Planning Inspector for the NSIP The Drove Solar Farm

May 2026

The Drovers Solar Farm – CPRE Norfolk written submission Examination

Dear Madam or Sir,

CPRE Norfolk welcomes the opportunity to participate in the Examination of The Drovers Solar Farm Development Consent Order (“DCO”) application.

CPRE Norfolk supports the transition to renewable energy and recognises the urgent need to decarbonise electricity generation in order to address climate change. However, this support is conditional upon renewable energy developments being appropriately scaled and sensitively located so as to avoid unacceptable harm to the countryside, landscape character, agricultural land, biodiversity, heritage assets, and rural communities.

In CPRE Norfolk’s view, The Drovers Solar Farm proposal fails to strike an appropriate balance between renewable energy generation and environmental protection. The proposal represents an industrial-scale transformation of open countryside and would result in significant and unjustified adverse effects which have not been adequately mitigated.

Located in Norfolk on land north of Swaffham and south of Castle Acre, West Norfolk. The proposal is for a new solar farm on 1,130 hectares of mainly arable agricultural land, with photovoltaic panels spanning across the operational area (825 ha), as well as associated infrastructure, including a substation, Battery Energy Storage System (BESS), fencing, and biodiversity and landscape mitigation. The proposed scheme sits within farmland with open, expansive views, mature trees, scattered woodlands, and a patchwork of arable fields. The area has a rural, agricultural feel with a low density of settlements.

Whilst CPRE Norfolk generally supports solar generation of electricity, particularly when it is situated on south-facing roof spaces, this needs to be weighed against any harms, so that the benefits can be justified. In this case we feel that this is not the case due to the following reasons.

The proposed development conflicts with several key principles and policies of national planning law and local plans, as set out below.

National Planning Policy Framework (NPPF Dec 2024) and associated national policy and guidance

The National Planning Policy Framework (NPPF) requires planning decisions to contribute to and enhance the natural and local environment, including by protecting valued landscapes and recognising the intrinsic character and beauty of the countryside.

While the NPPF supports renewable energy development, it also makes clear that proposals should be acceptable in planning terms and not result in unacceptable impacts. The scale and siting of the Drove Solar Farm would result in significant harm to the open rural character of this part of Norfolk, contrary to these core principles.

1. Inappropriate Use of Agricultural Land

The proposed solar farm is located on greenfield agricultural land. National planning guidance makes clear that the use of Best and Most Versatile (BMV) agricultural land should be avoided for large-scale solar development.

NPPF Paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment by protecting *'the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land.'*

In addition NPPF paragraph 125b states that *'planning policies and decisions should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production'*.

CPRE Norfolk is concerned that through providing solar energy this land is then largely lost to food production.

The proposal would lead to the loss of good quality agricultural land. Natural England identifies the sites as grade 3 and 4 agricultural land, presently used for growing arable commodity crops. Where solar farms are granted permission CPRE Norfolk would expect these to be sited on poorer quality land. Where proposals affect agricultural land, they should be refused where the land is graded at 1, 2 or 3a, in line with footnote 65 of the NPPF (Dec 2024) which states: *'where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.'* The NPPF defines the best and most versatile land (BMV) as land in grades 1, 2 and 3a of the Agricultural Land Classification.

Government guidance in its 'Guide to assessing development proposals on agricultural land' (updated 5 February 2021) is clear about the need to protect agricultural land and soil. These policies aim to protect *'the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals.'* It goes on to state that *'your decision should avoid unnecessary loss of BMV land.'* As the majority of the development is of BMV land, this development is well beyond the 20ha threshold for 'smaller losses' of BMV land, and is unnecessary as there are other sites of lower grade agricultural, or non-agricultural land available, if not in the immediate vicinity, certainly in the wider area, not to mention the many available roof spaces on current or planned residential and commercial buildings. The introduction of grazing sheep would not be an adequate or appropriate use of BMV land given the need to maximise food production.

Planning Practice Guidance (PPG) on renewable energy (Paragraph 013 Reference ID: 5-013-20150327) further reinforces that local planning authorities should seek to focus solar farm developments on *'previously developed and non-agricultural land,'* and that *'where a proposal involves greenfield land, it should be shown that the use of any such land is necessary and that poorer quality land has been used in preference to higher quality land.'*

The scheme provides no credible evidence that the use of this agricultural land is essential, or that alternative brownfield or lower-grade land has been considered. If the land is found to be Grade 2 and 3a or better, it qualifies as BMV, and its permanent loss would be contrary to national guidance.

2. Failure to Conserve and Enhance Landscape Character

NPPF Paragraph 187(a) requires that decisions protect and enhance ‘*valued landscapes*’ and the natural environment. The proposed development introduces significant industrial infrastructure, including extensive arrays of panels, fencing, access roads, and substations, in a rural and open landscape.

Breckland District Council’s Landscape and Settlement Character Assessment and the Breckland Design Guide provide frameworks for understanding and integrating development within the local landscape.

The Breckland Landscape and Settlement Character Assessment identifies a key landscape type relevant to The Drove Farm. The solar farm lies within the Wayland Plateau Farmland landscape type. Characterized by gently rolling farmland with open, expansive views, mature trees, scattered woodlands, and a patchwork of arable fields. The area has a rural, agricultural feel with a low density of settlements.

The proposed scale and extent of the solar array will create a significant alteration to the open rural character, especially from nearby public rights of way and minor roads. The large-scale installation of solar panels across thousands of acres introduces an extensive and visually distinct feature. The uniform, reflective nature of PV panels is incongruous with the more organic patterns of field and hedgerow found here. The reflective surfaces and the sheer extent of the development would contrast with the traditional farmland. This could significantly alter the sense of openness and rural tranquility valued in the countryside.

NPPF Paragraph 193 adds that planning permission should be refused for development resulting in significant harm to a landscape which cannot be adequately mitigated.

This development would result in substantial visual harm. Views from nearby villages and public footpaths will be affected reducing the visual quality of the countryside. No robust Landscape and Visual Impact Assessment (LVIA) appears to accompany the proposal, and any claimed mitigation through screening or planting is unlikely to reduce the visual harm during the 60-year operational period. Furthermore much of the mitigation on offer, e.g. planting hedgerows, would destroy current open attractive views along footpaths and minor roads.

In addition the proposal does not recognise ‘*the intrinsic character and beauty of the countryside*’ as required by NPPF (Dec 2024) para. 187b. Although the proposal does include planting, screening, minimal lighting etc. it still proposes to alter the intrinsic character of the countryside site through the imposition of solar arrays and several alien structures. Although the claim is these will be temporary, the reality is that this development would lead to these harms being felt for 60 years, plus the time taken to construct and decommission the site (if indeed it was decommissioned at that point.)

Paragraph 198 of the NPPF that relates to development being appropriate for its location, referring specifically to noise and light pollution and draws attention to intrinsically dark landscapes and nature conservation. This stands in line with the Norfolk County Council Environmental Lighting Zones Policy which identifies the site in an area of Rural Dark Landscape and therefore requires protection.

This proposal would introduce industrial-scale infrastructure into a rural, visually sensitive setting, resulting in significant and irreversible landscape harm. This is not consistent with the aim to protecting valued landscapes under the NPPF and other planning guidance.

3. Lack of Consideration for Sequential and Lower-Impact Alternatives

National planning law expects that renewable energy infrastructure should be developed in the most appropriate locations, balancing environmental, agricultural, and visual impacts. However: There is no evidence that alternative non-agricultural sites have been assessed in a meaningful sequential approach. CPRE Norfolk is not satisfied that the application robustly justifies the use of productive agricultural land, nor that alternative locations—such as previously developed land, commercial rooftops, car parks, or less sensitive sites—have been properly explored.

Recent studies, including by SolarQ UK, show that the UK's solar targets can be met without sacrificing productive farmland, by prioritising rooftops, car parks, and brownfield sites. The developer has not justified why these alternatives have been dismissed.

The way forward must be based on the potential to harness technological advances in solar energy production which have minimal impacts on the landscape. It will become possible to “harvest” solar power from all manner of artificial surfaces including road surfaces, warehouse and factory roofs etc and these methodological breakthroughs, together with other new approaches such as producing hydrogen from plastic waste, will ultimately make farmland consuming, landscape destroying commercial photovoltaic solar farms redundant. CPRE Norfolk wants to see more effort, ingenuity and resources put into these new methods of producing renewable energy and, once again, when and where possible, with maximum input from the local community. Research carried out by the UCL Energy Institute for CPRE confirmed that installing solar panels on existing rooftops and other land such as car parks could provide at least 40-50GW of solar energy in England by 2035 and by 2050, with further investment, that there is potential to generate 117GW of low carbon electricity from roofs and other developed spaces - i.e. well in excess of the government’s 2035 national target.

4. Cumulative Impact and Inadequate Justification

The NPPF requires planning authorities to consider the cumulative impacts of development.

The proposed solar farm adds to a growing number of renewable energy developments in the region, placing pressure on the landscape, wildlife corridors and rural communities. The cumulative negative effect of increasing numbers of solar farms in the wider area should be recognized.

CPRE has consistently advocated a “rooftops first” approach to solar deployment. Large-scale ground-mounted solar should not be treated as the default option where less harmful alternatives exist. The application fails to demonstrate that a sequential approach to site selection has been applied, contrary to the principle of sustainable development. Research by UCL for CPRE demonstrates that 117GW of solar energy is obtainable from roofs and artificial surfaces by 2050.

5. Uncertain Decommissioning and Land Restoration Strategy

National policy stresses the importance of temporary and reversible use of land for solar development. However, the proposal lacks a clear decommissioning plan, long-term land stewardship strategy, or legally enforceable mechanism to ensure restoration of land to its former agricultural use after the project’s lifespan.

Summary 1

The Drovers Solar Farm proposal fails to meet key national policy requirements:

- It risks permanent loss of productive agricultural land.
- It causes unacceptable landscape and visual impacts.
- It fails to consider lower-impact, sequentially preferable alternatives.
- It lacks compliance with the Environment Act and net gain obligations.

Conflict with the Breckland Local Plan (2023)

This proposal fails to meet key requirements set out in the adopted Breckland Local Plan.

6. Core Policies

Policy GEN 02 – Promoting High Quality and Sustainable Design

This policy requires development to contribute to the distinctive character and amenity of the area. The proposed industrial-scale development would significantly alter the rural landscape and is incompatible with the local character of the Breckland countryside. The visual intrusion would be especially acute from local rights of way and nearby properties.

Policy ENV 05 – Protection and Enhancement of the Landscape

ENV 05 requires that proposals *'have particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape.'* The site of The Droves Solar Farm forms part of an open, undeveloped rural setting that contributes to the area's landscape value. No sufficient landscape impact assessment has been presented to justify the scale and sensitivity of this development.

Policy ENV 06 – Trees, Hedgerows and Development

The proposal risks fragmentation of existing hedgerows and insufficient or unsuitable compensatory planting. The site layout does not indicate adequate biodiversity buffers or enhancements to mitigate the loss of semi-natural habitat, failing to meet the policy's aims.

Policy EC 06 – Farm Diversification

While this policy supports diversification, it makes clear that development must be "appropriate in scale and character" and not conflict with wider sustainability and environmental objectives. This scheme far exceeds the scope of reasonable diversification and appears driven by commercial energy generation objectives rather than agricultural enhancement.

7. Loss of Best and Most Versatile Agricultural Land

The proposed site may comprise Grade 3 quality land, classifying it as Best and Most Versatile (BMV). Policy guidance at both national and local levels advocates against the irreversible loss of BMV land unless there is no alternative. The Breckland Local Plan (ENV 01) emphasises the need to maintain and protect soil quality.

8. Cumulative and Visual Impact

The proposal contributes to a growing concentration of solar schemes in the Breckland area. There is no cumulative impact assessment to measure the combined visual, landscape, and ecological burden of this and other nearby energy developments. The absence of a landscape capacity analysis undermines the credibility of the scheme.

Summary 2

The Droves Solar Farm proposal fails to meet key local policy requirements:

- It conflicts with several core policies in the Breckland Local Plan (GEN 02, ENV 05, ENV 06, ENV 01, and EC 06).
- It fails to demonstrate need or appropriateness for the use of greenfield and potentially BMV land.
- It fails to meet the expectations for low-impact renewable energy development.

Conclusion

CPRE Norfolk welcomes the expansion of renewable energy but stress the importance of scale, siting, and landscape sensitivity. We want to see new renewable energy projects done well, in a way that minimises impacts on the Norfolk countryside. This proposal fails on all three counts.

This proposal would introduce industrial-scale infrastructure into a rural, visually sensitive setting, resulting in significant and irreversible landscape harm.

The proposal is inconsistent with the objectives of national and local planning policy, which seek to protect distinctive landscapes, support sustainable rural communities, and direct inappropriate development away from the open countryside.

Yours sincerely,

 (CPRE Norfolk)