

Droves Solar Farm (NSIP) application, Swaffham, Norfolk

Response by [REDACTED], Castle Acre Parish Council, Reference [REDACTED]

Copy of Submission from [REDACTED], Castle Acre Parish Council, to the Issue Specific Hearing 1 held on 7 May 2026.

Cultural Heritage.

I work as a heritage consultant and have a special interest in landscape history.

The proposed Droves Solar Farm will have a negative impact on the historic landscape of the Nar Valley and its many centuries of agricultural use.

The word acre comes from the Old English for a plot of arable land. Both Castle Acre and South Acre Parishes were well-established by the time of the Norman Conquest, their population, land ownership and productive resources being detailed in the Domesday Book of 1086.

What is at risk if The Droves Solar Farm goes ahead, is the rural settlement pattern of farmsteads alongside nucleated villages; the narrow rural road network, much of which is based on medieval trackways and holloways, bounded by banks and ditches; the remnant medieval field boundaries and livestock droeways and the Agricultural Revolution 'improvements' of rectangular fields with marl pits.

The area has been called Norfolk's "Holy Land" due to the high concentration of medieval religious sites, six in total and with Castle Acre and West Acre Pories as the most extensive. Also impressive are the ruins of 12th-century Norman castle at Castle Acre with extensive earthworks and surviving masonry and the Grade 1 listed churches of Castle Acre and South Acre, as dominant features in the landscape

All these settings will be adversely impacted by the industrialisation of their encompassing landscapes.

In particular, the Roman Road known as the Fen Causeway -Fincham Drove which links Ermine Street to the Peddar's Way and the Norman designed landscape in which the original course of the Peddar's Way was abandoned and a new southern approach to Castle Acre created along the ridge to give the most impressive approach to Castle Acre, displaying the high status sites of Pory, Church and Castle to the best advantage. It was this approach which would be familiar to the visiting kings, Henry III and Edward I.

The visual and experiential harm caused by the scale, fencing, and infrastructure of the proposed solar farm would be significant, compromising the cultural landscape of one of Norfolk's most important heritage clusters.

The topography of the landscape surrounding Castle Acre, its prominent position above the Nar Valley and consequent changes in elevation provide for a number of stunning views which are not to be found elsewhere in Norfolk.

It is the undoubted beauty of its landscape and the richness of Castle Acre's historic and natural environment that sets it apart from many other Norfolk villages. It is therefore a major attraction to visitors but is equally treasured by its residents who value access to the surrounding countryside and the generally underdeveloped rural character of the area and its sense of remoteness and tranquillity.

I would therefore ask the examiner to take into consideration the long-term and unjustified harm to an irreplaceable historic environment which contains within it over one thousand years of landscape history and heritage.

Further to my submission on 7 May 2026, I would like to add the following, as set out below.

Conflict with the Castle Acre Neighbourhood Plan 2022

The Castle Acre Neighbourhood Plan, developed and adopted by the local community, sets out a clear vision to protect and enhance the village's historic character, its rural landscape setting, and its natural environment.

Specifically, the Plan emphasises:

- Preservation of the unique historic landscape and heritage assets of Castle Acre, including its internationally important Scheduled Monuments and the Conservation Area;
- Protection of valued countryside views and rural approaches;
- Support for sustainable development that aligns with the community's identity and landscape sensitivity.

The Drovers Solar Farm proposal contradicts these aims.

It introduces a large-scale industrial development into the rural setting of Castle Acre, undermining the Plan's objectives to protect heritage, landscape character, and local biodiversity.

As such, approval would conflict with a democratically endorsed statutory planning document and erode public confidence in neighbourhood planning.

Impact on Statutory Heritage Assets and Their Setting

The proposed solar farm lies within the setting of multiple designated heritage assets, including:

- Castle Acre Priory (Scheduled Monument)
- Castle Acre Castle (Scheduled Monument)
- Bailey Gate (Scheduled Monument)
- St James the Great Church (Grade 1 listed)
- St George Church, South Acre (Grade 1 listed)
- The historic route of the Peddars Way (parts of which are a scheduled monument as it was a Roman Road and later used by pilgrims travelling to the medieval shrine at Walsingham. It is now a National Trail).

These assets are protected under the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires authorities to preserve their setting.

Paragraphs 199–208 of the National Planning Policy Framework stipulate that "great weight" must be given to conserving heritage assets. Any harm to their setting, even if "less than substantial," must be clearly justified and outweighed by public benefit.

These heritage assets are of particular importance when regarded together. There is a direct archaeological and historical association between the Castle, the 12th century planned settlement and its defences and the Priory (all founded by the de Warennes) above the Roman crossing point of the River Nar.

The Roman Road known as the Fen Causeway- Fincham Drove meets the Peddars Way close to Bartholomew Hills and was a key feature of the landscape before agricultural

enclosures, as an essential route for moving livestock (cattle, sheep, geese, and turkeys) to markets or seasonal grazing pastures.

The present-day lane from the A1065 to South Acre is actually a key part of the unique Norman designed landscape in which the original course of the Peddar's Way was abandoned and a new southern approach to Castle Acre created along the ridge. This was a deliberate manipulation so that the route from the south gave the most impressive approach to Castle Acre from Great Palgrave to the South Acre Road then via South Acre Ford along Blind Lane to the South Gate and into the planned town, displaying the high status sites of the Priory, Church and Castle to the best advantage. It was this approach which was seen by visiting kings, including Henry III and Edward I.

The Priory at Castle Acre, the second Cluniac foundation in England, is one of six religious houses sited along the Nar Valley and these were all visited by pilgrims travelling to the medieval shrine at Walsingham, the second most important religious centre, after Canterbury.

A 12th century leper hospital stood on Bartholomew's Hills. Even the name is a significant survival, as Bartholomew was the patron saint of lepers.

The setting of these historic buildings and sites is a major part of their significance and of our appreciation of them. The proposed Drovers Solar Farm will deprive them of their context within the wider historic environment and landscape.

Threat to Archaeological Significance

Castle Acre lies in an area of high archaeological potential, with documented features from Roman, Saxon, and medieval periods.

Development of this magnitude risks destroying unrecorded archaeological remains.

It also takes away any opportunity to discover more about this historic landscape for sixty years, as any archaeological investigations will be impossible on land covered by solar panels.

Additional Concerns:

The Natural Environment

Impact on Soils and Geology

The geology of the Nar Valley is characterized by a succession of glacial, interglacial, and modern deposits including sandy and gravelly deposits, rich in flint and chalk pebbles, laid down as the glacial valleys were infilled after the ice retreated.

One site in particular is of special significance – Bartholomew Hills.

The site is composed largely of glacial sand and gravel deposits from the Quaternary Ice Ages, about 430,000 years ago.

Bartholomew Hills is proposed as a site for the sub-station which will destroy the significant geological features, the most prominent of which is the accumulation of Quaternary-age sands and gravels associated with the ancient "Kesgrave-type Sands and Gravels," laid down by a pre-Anglian river system (similar to the modern Thames), and subsequent glacial outwash during various Ice Ages.

The Palaeolithic material from this site is of particular significance due to the presence of crude cores and thick flakes alongside cores and flakes that display evidence for Levallois techniques. A number of handaxes and flakes with secondary working have also been recovered.

Impact on the River Nar SSSI and Local Nature Recovery Goals

The site lies within the catchment of the River Nar, a protected chalk stream designated as a Site of Special Scientific Interest (SSSI) supporting a range of important Biodiversity Action Plan habitats, including chalk stream areas, fens, wet meadows and woodlands.

One of only about two hundred and twenty chalk streams in the world and described by the Norfolk Rivers Trust as 'arguably Norfolk's most unspoilt and beautiful example' the Nar supports an outstanding assemblage of dragonflies as well as the Biodiversity Action Plan mollusc species, Desmoulins' whorl snail, listed as 'endangered'.

As a large-scale solar farm on currently agricultural land, it risks displacing birds from their natural habitats and is particularly detrimental to ground-nesting birds and species that rely on open fields for foraging such as lapwing, skylark, yellowhammer, corn bunting and turtle dove, all species that are on the *Birds of Conservation Concern Red List*.

Under NPPF Paragraphs 180–182, any development with potential to harm SSSIs or irreplaceable habitats must be avoided or rigorously mitigated.

The proposal risks habitat fragmentation, biodiversity loss, and increased surface runoff — all of which are contrary to the Environment Act 2021 and emerging Local Nature Recovery Strategies.

Impact on food production and food security.

Farming in the locality contributes greatly to the rural feel of Castle Acre, providing green views away from the village with a large regular field pattern broken up by belts and copses of mixed and coniferous woodland and plantations whilst also providing employment and income to the area.

The proposed site includes land likely classified as Grades 2 and 3a, which fall under the government's definition of Best and Most Versatile (BMV) agricultural land — the highest quality for food production. Under NPPF Paragraphs 174 and 180, the loss of such land should be avoided unless absolutely necessary.

No details have been presented as to how the land will be returned successfully to agriculture nor to the cost to do so.

In fact, it is highly unlikely that the land could return to agriculture in 60 years' time because of soil contamination from chemical leaching; the bases of the posts left in the ground; the intrusive infrastructure; the lack of new-generation farmers and especially tenant farmers.

Removing this land from agricultural use for decades undermines sustainability goals and conflicts with the Castle Acre Neighbourhood Plan, which supports continued agricultural use and rural character.

The development would set a concerning precedent for future loss of the 'best and most versatile' (BMV) land in Norfolk.

The reduction in our home food production capacity should be of concern to us all.

If we lose farms and farming, we risk damage to the local infrastructure and to tourism but above all, we will destroy the stewardship of the land which has supported rural communities across the UK for centuries.

Impact on Castle Acre's Dark Skies Policy

From the national dark skies/light pollution maps produced by the Countryside Charity (formerly the Campaign for Rural England CPRE), Castle Acre falls into Category 3 (of a scale of 9, with 9 being the most polluted).

The surrounding area, with less habitation, falls into Category 2 –and from the maps is *clearly visible as a darkened landscape. It is this very area which is the site of the proposed solar farm.*

The effects of the security lighting:

- Sky glow is a product of light being scattered by water droplets or particles in the air.
- Light trespass occurring when artificial light illuminates an area that would otherwise be dark.
- Glare is created by light that shines horizontally.
- The effect on wildlife
- The effect on human health and wellbeing.

The adoption by Castle Acre Parish Council of a Dark Sky Policy based on the NPPF's Framework Clause 180c and Norfolk County Council's Environmental Lighting Zones Policy, the impact of operational and security lighting from the proposed solar farm is an additional concern, adversely affecting the quality of our night skies and their value to nocturnal wildlife.

Impact of Noise Pollution

Though solar panels themselves do not emit noise, the infrastructure surrounding the solar farm will create residual noise, particularly from the sub-station, the battery storage, inverters and fans.

With a large-scale solar farm such as The Drovers, up to 100 inverters will be required which will produce a sound pressure level of 74db per inverter as a persistent hum. In hot weather, inverters can overheat so noisy fans might be needed.

In this rural and tranquil landscape, such additional noise will be intrusive, affecting the quality of life of residents and all those using the Public Rights of Way and footpaths on or near the solar installations as well as being damaging to local wildlife.

With a two -year construction timescale, the noise generated by piling for the panel supports, the installation of associated infrastructure and from construction traffic on local roads is another reason for objecting to the proposed solar farm.

Impact on the local economy and tourism, including the issues related to construction traffic and materials' transportation.

Castle Acre is one of the recognised 'honeypot' sites in the county, described by 'Visit Norfolk' as 'an important Norfolk visitor attraction' because of its beautiful rural setting and 'extraordinary wealth of history' with the ruins of the Cluniac Priory; 12th century Castle and Bailey Gate and Grade 1 Listed 14th century parish church. Visitors also come to Castle Acre for arts and cultural events and to enjoy the countryside walks.

Facilities supporting tourism include a sixteenth century inn offering meals and accommodation, a tearoom and a general store with a post office.

Castle Acre's position as an important tourist attraction supports hospitality and accommodation businesses which bring value and employment to the village.

The industrialisation of the environment, undermining the area's aesthetic value, will reduce its attractiveness to tourists and potentially harming the local tourism economy.

The World Health Organization recommends solar farms be at least 2 km (1.2 miles) from residential areas protecting wellbeing, yet this development will sit just a short distance from parts of South Acre, with parts of Castle Acre and Swaffham also within this health guideline zone.

Impact on the Quality of the Landscape and Views

The proposed Drovers Solar Farm would introduce visually intrusive infrastructure into an open, rural landscape that contributes to the village's identity and attracts visitors.

Peddars Way and Nar Valley Way users, residents, and tourists would experience industrialisation of a previously tranquil and historic setting.

This conflicts with NPPF Paragraphs 187 and 204 and Local Plan policies that seek to safeguard the intrinsic character and beauty of the countryside.

Continuous rows of glass panels will completely alter the landscape character which is currently rural and tranquil.

The overhead utility cables and new pylons will be new intrusive features.

Not only the solar panels themselves but the security fences; CCTV cameras; inverters; access tracks and substations will cumulatively destroy the rural landscape for ever.

Impact on the Important Views.

The topography of the landscape surrounding Castle Acre, its prominent position above the Nar Valley and consequent changes in elevation provide for a number of stunning views which are not to be found elsewhere in Norfolk.

These include long views towards the village itself from all directions and from the village looking out to the wider landscape and the designated historic assets.

The significant views are as follows:

- From the Castle - its elevated position means that the Castle has commanding views over the Nar Valley.
- St James Church stands within a walled churchyard, and the view opens out over the grounds of the Priory to the opposite valley side.
- St George's Church, South Acre whose site on a quiet lane is backed by fields and woodland.
- Bailey Street is characterised by its steep downward gradient winding gently southwards from the Bailey Gate towards the open pastures in the south and the softer landscape of trees and hedges on the opposite valley side.
- Views into the village from the north and northwest characterise the traditional rural village in harmony with the rural landscape.
- Views from the south, especially from the A1065 north of Swaffham.

The natural topography of the area and the river valley providing the rationale for the positioning of the Castle and the Priory and the relationship between the historic and natural landscapes has been interlinked ever since.

The Cumulative Impact

With between 7000 and 9000 hectares of potential solar developments proposed across Norfolk, the cumulative impact on landscape character, biodiversity, and heritage must be assessed at a strategic level, taking into account the legal requirements to:

- protect designated and non-designated heritage assets and their setting;
- conserve ecological networks and sensitive habitats;
- avoid inappropriate development in open countryside and rural landscapes

Given that three major solar farms are planned in the local area—High Grove, East Pye, and The Droves—covering a total of 3,849 hectares of arable farmland, there are concerns that the cumulative impact of these developments could be catastrophic for local agriculture, landscape, tourism, wildlife, and the community.

The visual intrusion of these large-scale solar farms will dramatically alter the character of Norfolk's countryside, diminishing its natural beauty and appeal and destroying its aesthetic and environmental integrity for future generations.

Conclusion

It may be convenient for the developer that the proposed hectares are in single ownership, but it is not convenient for those who live and visit, appreciating the beauty, heritage, wildlife and tranquillity of the unique Nar Valley.

The Droves would introduce a large-scale industrial development into this rural setting and is incompatible with Castle Acre's heritage status, ecological importance, and community-led planning objectives.

It represents a form of unsustainable development that would cause long-term and unjustified harm to an irreplaceable historic and natural environment.





Questions

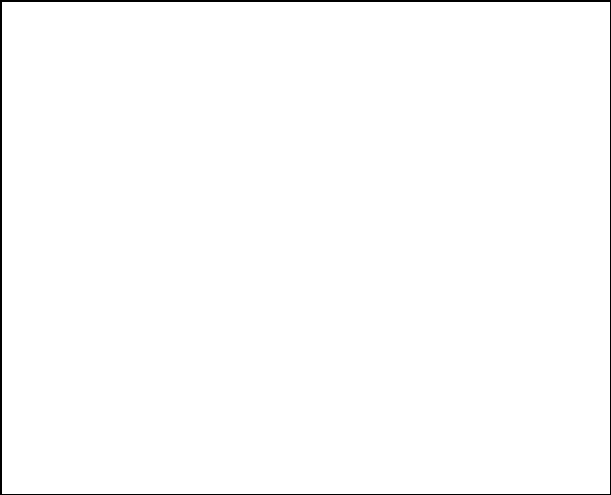
1. In this unique cultural landscape, how will the setting of the listed churches; the Castle Acre Conservation Area; the scheduled monuments and the historic landscape features be protected ?
2. How will the existing public rights of way retain the open views which are a visual amenity and asset ?
3. How will public access and recreational enjoyment be restricted during any construction period and be affected during the sixty year lifespan, including when the solar panels require maintenance and / or replacement ?
4. When topsoil and subsoil are removed from the site, what measures will be taken to assess and protect buried archaeology, including individual finds ?
5. What consideration has been given to other sources of green energy such as wind turbines which will have less impact on the landscape ?
6. How can a decision be made when there are 'unknowns' such as the site of the sub-station and the connection to the National Grid ?
7. What consideration has been given to the cumulative impact on Norfolk of the existing and proposed energy infrastructure in the county as a whole ?

8. Would there be monitoring of the construction phase and maintenance by an independent evaluator ?

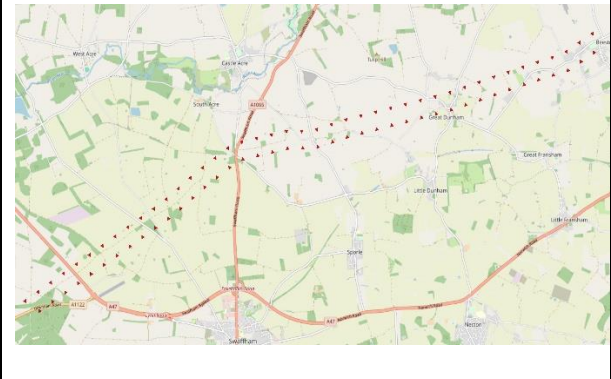
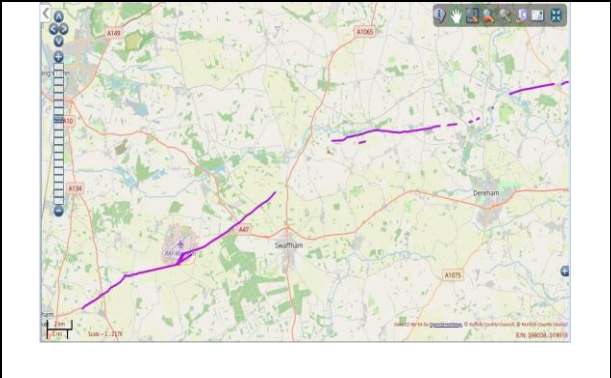
9. Would the results of the monitoring be in 'the public domain' in the interests of transparent accountability ?

Photographs and Maps referencing text above.

	
<p>Junction South Acre Road off A1065 at Bartholomew Hills</p>	<p>Veteran Tree, Bartholomew Hills.</p>
 <p>The map shows the area around Castle Acre and Peddars Way. It includes a key with the following entries: Peddars Way (blue line), Norman diversion (orange line), and Peddars Way possible original route (pink line). Other locations marked on the map include South Acre, The Priory, St James Church, Hungry Hill, and Great Palgrave. A scale bar indicates 0, 0.5, and 1 km. The map data is attributed to OpenStreetMap contributors.</p>	



Norman Planned Route to Castle Acre
South Acre Road and designated Peddar's
Way Trail Route.



Route of Fincham Drove (from Norfolk HER)
and evidence from LIDAR.

Fincham Drove Roman Road at
Bartholomew Hills, west of A1065.



Washpit Drove, medieval trackway now
proposed access route.



Proposed western boundary of solar farm.



Grade 1 listed St George's Church



Fields from Churchyard part of the proposed solar farm.



From A1065 towards Swaffham, looking west to area of solar panels



Looking east over the Nar Valley rural and agricultural landscape.



Palgrave Road west across the Nar Valley.



Palgrave Road, with proposed Drovers on the horizon.



Priory Precinct Field across the Nar Valley, where the solar panels will be visible.



The setting of Castle Acre Priory will be negatively impacted by the solar panels.

Our much-valued historic and agricultural landscape, at risk of solar farm industrialisation and irretrievably and irrevocably lost.



From the ramparts of Castle Acre Castle, looking south-east.



Castle Acre Priory and St James the Great Church, in their landscape setting.



Castle Acre from the proposed site of The Drovers.

██████████, Castle Acre Parish Council

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1 June 2026.