

Written Representation of The Borough Council of Kings Lynn and West Norfolk in respect of The Droves Solar Farm application

1. INTRODUCTION

- 1.1. This Written Representation is the views of The Borough Council of Kings Lynn and West Norfolk (herein referred to as “The Council”) and draws upon matters discussed within our Local Impact Report and does not intend to express the views of Breckland District Council or Norfolk County Council as host authorities. The document focuses upon the impacts of the proposed scheme on our Borough and acknowledges that differing or more significant impacts may be felt more widely for the host authorities, including cumulative impacts from other similar schemes elsewhere in Norfolk.
- 1.2. The Government announced on 25th March 2026 that the Local Government Reorganisation process will proceed on the basis of three unitary authorities across the county. The new West Norfolk Unitary Council will comprise the geographic areas served by West Norfolk and Breckland, plus a small part of South Norfolk. The Structural Change Order is expected to pass to law in the Autumn, allowing reorganisation to proceed and setting out transition arrangements. It is not expected that this process would significantly impact upon the scheme, other than the implications for relevant authorities to discharge details if DCO consent is granted.
- 1.3. The Droves Solar Farm is a scheme for the installation of solar photovoltaic (PV) panels, on site Battery Energy Storage System and two substations across a site within the Breckland District Council area and adjoining the Borough Council’s area south of Castle Acre. The proposal includes the grid connection infrastructure to allow transport of generated power to the grid.
- 1.4. The Council recognises the clear national benefits of renewable energy and as such are supportive to the principle of renewable energy and low-carbon energy generation schemes, subject to consideration of their scale and impacts. In summer 2021, the Council announced a climate emergency with a robust Climate Change Strategy and Action Plan subsequently put in place and adopted in September 2021. The Council has also granted planning permission for a number of solar energy projects and is familiar with their nature and impacts.

2. LOCAL CONTEXT

- 2.1. As a predominantly rural Borough, the future of the countryside is a significant issue, and the Council is committed to maintaining and protecting the quality of its unique environment. The area benefits from a rich and diverse landscape, and the immediate setting of the proposal scheme is rich in heritage assets including Conservation Area, Listed Buildings and Scheduled Ancient Monuments which contribute to the overall character of the environment.
- 2.2. The proposed development area is a unique and special area and this development would introduce a significant amount of intrusive industrial infrastructure. The use of large expanses of farmland for

solar panels and associated infrastructure including substations, transformers and battery energy storage systems will result in effects on the undeveloped serene character of the area and will dramatically and significantly alter the landscape and functioning of the area and the setting of highly important heritage assets.

- 2.3. Local residents, local groups, and local Members of Parliament have raised serious concerns as part of representations to the Council and directly to the Examining Authority regarding the impact of the development on the area and have highlighted inadequacies in the application material in relation to a number of environmental topics. The Council also note the concerns raised by Norfolk County Council and Breckland District Council in regard to various matters including cumulative landscape impacts, grid connection uncertainties, and loss of agricultural land both independently and cumulatively and shares many of these concerns.

3. POLICY CONTEXT

- 3.1. The Council's Local Impact Report sets out local policy as it relates to this proposed development with reference to the Local Plan and Castle Acre Neighbourhood Plan. Whilst the Order limits fall outside the Council's area, the Council expects the Examining Authority to take account of these local policies where relevant, which have been subject to due process and adopted in the expectation that they will be used to guide future development which has the potential to impact upon the Borough.
- 3.2. The Council understands that a Nationally Significant Infrastructure Project (NSIP) of this nature is subject to the National Policy Statements (NPSs), however, the importance of local policy should not be downplayed given that it is specific to the area in which it applies. The local policies remain important and relevant considerations in the decision-making process.
- 3.3. Policy LP06 of the Local Plan (2021-2040) states that development shall recognise and contribute to the importance of, and future proofing against, the challenges of climate change and to support the transition towards meeting the Net Zero target.
- 3.4. Policy LP18 of the Local Plan states the Council will support and encourage the generation of energy from renewable sources. These will be permitted unless there are unacceptable locational or other impacts that could not be outweighed by wider environmental, social, economic, and other benefits.
- 3.5. Policy LP24 of the Local Plan generally supports proposals for renewable energy and associated infrastructure, subject to consideration of impacts upon ecology, landscape, heritage, amenity, contamination, public safety, tourism and other economic activity and the loss of agricultural land. These considerations are expanded upon within Policies LP06, LP18, LP19, LP20 and LP21 of the Local Plan. The policy goes on to state that development may be permitted where adverse impacts can be satisfactorily mitigated against, and where that mitigation can be appropriately secured.

4. LANDSCAPE AND HERITAGE IMPACT

- 4.1. The application site is in an area which is rich in designated sites of historic significance concentrated within the settlements of Castle Acre, West Acre, and South Acre. Assets such as Castle Acre Castle and Priory, the Church of St James, and the Castle Acre Conservation Area gain part of their

significance from their wider setting. The industrialisation of the landscape will result in harm to these heritage assets. The level and assessment of harm is a matter of disagreement for the Council.

- 4.2. Castle Acre Castle is positioned within the valley setting in a position which commands views across the landscape – its elevated position and the far reaching views available to and from this asset form a key part of its significance given that the purpose of a Castle is to allow the security and defence of the surrounding landscape from invasion. It is not therefore correct to suggest that the asset's significance is primarily derived from its physical form.
- 4.3. Furthermore, the Conservation Area at Castle Acre comprises a collection of heritage assets, both designated and non-designated, that as a whole have a harmonious and coherent story to tell when viewed collectively as a group and as part of the landscape in which they sit. The pan tiled roofs of the main village guide the eye towards the more prominent civic buildings and this long view from the undeveloped countryside setting, the village and the civic buildings such as the Castle, the Church and the Priory shows a clear visual interpretation of the hierarchy of power.
- 4.4. The proposed solar development has the potential to impact the setting of these heritage assets by dramatically changing the character of the landscape, the rural qualities of which are key to the understanding and context of these important buildings and places. The proposed mitigation, which largely relies upon additional landscaping, will not remove the harm and in places has the opportunity to itself lead to harm. It is not clear to the Council at this time that the mitigation has been sufficiently detailed to allow a positive judgement of the harm versus community benefits.

5. ECOLOGY AND BIODIVERSITY IMPACTS

- 5.1. The proposal will result in the direct loss of arable habitat and therefore the loss of breeding and foraging habitat for various species. The assemblage of breeding birds on the site includes priority species and the site is known to provide habitat for bat species. Disturbance during construction activity and throughout operation could have adverse impacts on local populations. Natural England and the Norfolk Wildlife Trust have raised potential concern over the position of pylons within the curlew mitigation land, whereby predator species may use the pylon line to perch above protected species. The predator exclusion measures for this mitigation land therefore should be clarified and reviewed. A lighting strategy is required to prevent impacts on bats.
- 5.2. The Council welcomes the commitment to a minimum 10% uplift for biodiversity net gain and would encourage that this is appropriately secured through submission of a Habitat Management and Monitoring Plan or similar.
- 5.3. Various mitigation measures and management plans are intended to prevent impacts upon protected sites. These measures must be adequately secured for each stage of the process in order to prevent impacts upon areas such as the Nar Valley and its sensitive waterbodies.

6. RAF MARHAM - IMPLICATIONS FOR AVIATION

- 6.1. The position of RAF Marham as a key employment site for the Borough and its contribution to the Nation's security is represented throughout our Local Plan – including in particular Policy LP10. The Council raise significant concern over the implications of the issues raised by the Defence Infrastructure Organisation (DIO) – both in terms of impacts upon site safeguarding and the precision

radar systems as a result of the development itself, however also conversely in regard to the landscape setting implications of any required mitigation to overcome these concerns. The construction of an extensive bund, fence, or wall could have significant landscape implications which are not possible to assess in the absence of any clarity on this matter.

7. GRID CONNECTION

- 7.1. The Applicant has previously set their position in regard to their Grid Connection Offer and are continuing to seek consent via this DCO application. Our engagement to date is based upon the plans and supporting information as submitted. The lack of a formal connection offer continues to raise concern from the Borough Council's perspective as to the uncertain details of the proposal.
- 7.2. Ultimately, it is a matter for the Examining Authority to consider whether or not the proposal has been suitably detailed to allow assessment of the significant effects on the environment and to comply with the relevant regulations.
- 7.3. As noted during pre-application discussions, the position of key infrastructure is a key concern for BCKLWN, and any change to the grid connection would likely result in knock on impacts, for example on the incredibly sensitive historic setting or the surrounding landscape and this may alter the Borough Council's stance to the development as a whole.

8. OTHER IMPACTS

- 8.1. Approximately 55% of the site falls within the definition of Best and Most Versatile (BMV) agricultural land. Whilst the 60 year decommissioning timeframe set out by Requirement 20 is noted, the loss of BMV, particularly in combination with other schemes across Norfolk as a whole is a concern for the Borough Council.
- 8.2. In regard to cumulative impacts more generally, The Borough Council support the concerns of Norfolk County Council and Breckland District Council raised at Relevant Representations stage in regard to the in-combination effects of solar developments across Norfolk as a whole.
- 8.3. Particular attention is drawn to the potential implications of High Grove Solar Farm to the east of the site which also adjoins Swaffham and the potential in-combination effects on adjoining settlements, in particular in relation to the landscape and heritage assets as discussed above.

9. CONCLUSION

- 9.1. Whilst the Council acknowledges the contribution that the proposed development would make towards achieving the goals of energy security and renewable energy generation, the Council questions compliance with policies aimed at minimising harm and protecting the landscape and natural environment within the local area and whether the relevant planning policies have been demonstrably met in relation to the proposed scheme.