

# JAMES WILD MP

Member of Parliament for North West Norfolk



HOUSE OF COMMONS  
LONDON SW1A 0AA

June 2026

## **RE: The Drovers Solar Farm (EN0110013) Written Representation – Deadline 1, 2 June**

As Member of Parliament for North West Norfolk, I submit this representation in relation to the Development Consent Order (DCO) application for The Drovers Solar Farm (EN0110013). It follows my Relevant Representation of February 2026 and my interventions at the first Issues Specific Hearing (ISH1) on 7 May, addressing further technical concerns arising from that process. The issues outlined below reflect constituents' concerns and remain unresolved and bear materially on the planning acceptability of this proposal.

**Grid Connection Uncertainty.** The Applicant does not hold a formal Gate 1 or Gate 2 connection offer from National Grid Electricity Transmission (NGET). At ISH1, NGET confirmed the existing connection agreement is “non-binding” and was “unable to confirm the connection point at this stage”, describing the reference node as “indicative”. It further acknowledged it is unlikely to complete its review of the substation location until 2027 or 2028. Paragraph 3.3.79 of NPS EN-1 requires applicants to demonstrate how the full chain of consents, including grid connection, will be secured. Proceeding on this basis, with any Gate 2 offer deferred, fails that requirement, creating a deliverability deficit, particularly as NGET’s evidence was that its position “won’t change during the course of the examination or prior to the Secretary of State determination”, risking consent absent to a demonstrable route for exporting electricity.

**Absence of Confirmed Substation Proposals.** NGET stated it is “not currently developing proposals to build a new substation within the project order limits” and remains “agnostic” as to the final site. It further confirmed a Gate 1 offer “does not constitute a commitment... to deliver a substation of this size and design in this location”. Paragraph 3.3.79 of NPS EN-1 requires necessary connected infrastructure be demonstrably deliverable. That is not satisfied as the NGET has neither adopted the proposed site nor committed to deliver the infrastructure in that form. Consent would therefore rely on infrastructure not presently committed, or defer a core element to a later stage.

**Construction Traffic and the A1065.** Local testimonies describe the A1065 as “one of the most dangerous roads in the county” and already under strain. These pressures are intensified by cumulative impact with the neighbouring High Grove scheme, together covering approximately 7,000 acres. NPPF paragraph 116 requires cumulative highway impacts to be assessed against a severe impacts test. However, the Applicant’s oCTMP defers key routing and safety measures to a post-consent stage, meaning there is no assessed basis for concluding that a peak of 622 daily vehicle movements can be safely accommodated. There also continues to be no meaningful consultation on these deferred measures, and local concerns remain that the proposed fencing could funnel deer across the A1065 through narrow corridors, creating an added collision risk.

**Landscape Bunds and Visual Impact.** To address potential radar interference at RAF Marham and the DIO’s objection, it was stated at ISH1 that earth bunds may be required along the eastern boundary. Evidence indicated these could be 4.5 metres high, 20 metres wide at the base, and of substantial length.

The Applicant declined to address scale in detail, describing this as “premature”. This neglects paragraph 2.6.2 of NPS EN-3 and Planning Inspectorate Advice Note 9, which requires assessment on a “worst-case” basis. For reference, a comparable scheme at West Camel near RNAS Yeovilton required smaller bunds yet was described as a “blot on the landscape” by South Somerset District Council Area East Committee. The likely scale of bunding here has not been assessed within the visual impact work, leaving a gap in the assessment.

**Construction and Operational Noise Pollution.** The scheme would introduce sustained noise into a tranquil rural landscape prized by residents and walkers on the Peddars Way and Nar Valley Way. Construction would involve a two-year programme of 11-hour working days, including piling, HGV movements from 07:00, and potential night and weekend operations. The 10.5-hectare Battery Energy Storage System would introduce continuous operational noise over a minimum 60-year period. NPPF paragraphs 187(e) and 198(a)–(b) require development to avoid unacceptable noise impacts and protect tranquil areas. The Applicant’s oCEMP does not assess cumulative noise effects from neighbouring schemes and defers mitigation to a post-consent. There is therefore no demonstrated basis for concluding these effects can be avoided.

**Heritage Loss.** The impact of the proposal on the setting and significance of a nationally important cluster of designated heritage assets in the Nar Valley remains unresolved. The area is described by heritage experts as Norfolk’s “Holy Land” due to its concentration of medieval religious sites, Norman earthworks and Grade I listed churches. Expert testimony at ISH1 made clear the surrounding landscape is intrinsic to significance, with monuments deliberately sited to command the topography and their setting central to their experiences, particularly along the “Norman ridge approach” where the Priory, Church and Castle are experienced in sequence. NPPF Paragraph 212 requires great weight be given to designated heritage assets. However, the Applicant’s assessment continues to treat the landscape as secondary rather than integral, leaving a gap in heritage assessment and resulting in potential harm to their setting and significance.

**Engagement and Community Benefit.** Despite the Examining Authority’s instruction (Action Point 13) for engagement with local councils by Deadline 1, Castle Acre Parish Council reports “meaningful discussions” have not taken place, and correspondence dated 7 July 2025 remains unanswered. A further request on 27 May 2026 to establish a process for community benefit has also received “no response”, inconsistent with the Applicant’s position engagement is ongoing. Continued reliance on a generic community fund, as previously noted, does not secure direct benefits such as discounted energy bills, and an agreed mechanism for community benefit at the very least is yet to be established.

## Conclusion

The National Policy Statements and the National Planning Policy Framework require proposals to be properly assessed, deliverable, and to take account of local circumstances and cumulative impacts. However, the unresolved concerns set out show that this proposal in its current form falls short of those requirements. I therefore urge the Examining Authority to weigh these concerns carefully and reflect them in its recommendation to the Secretary of State.

Yours sincerely,



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