

## **EXAMINING AUTHORITY FOR THE DROVES SOLAR FARM (EN0110013) SUBMISSION FOR DEADLINE 2 (19 JUNE 2026)**

**DOCUMENT:** Written Representation by an Interested Party

**SUBMITTED BY:** Antony Morgan

**STATUS:** Interested Party / Local Resident

**ADDRESS/LOCATION:** Castle Acre / Swaffham area, Norfolk

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### **1. INTRODUCTION**

1.1. I am a local resident living in close proximity to the proposed development site for The Droves Solar Farm.

1.2. This Written Representation expands upon my Relevant Representation and focuses specifically on critical unresolved issues raised during Deadline 1. It outlines key questions that the Examining Authority (ExA) must require the applicant to answer before this application can be considered acceptable under the National Policy Statements (NPS EN-1 and NPS EN-3).

### **2. LAND USE AND DEGRADATION OF AGRICULTURAL LAND**

2.1. The applicant proposes to utilize approximately 825 hectares of land, a substantial portion of which constitutes Best and Most Versatile (BMV) agricultural land.

2.2. Questions for the Applicant:

- What highly granular, field-by-field soil data justifies the industrialization of BMV land over alternative brownfield or lower-grade sites within the region?
- What is the precise, calculated cumulative loss in domestic food production volume over the project's multi-decade operational lifespan?

### **3. BATTERY ENERGY STORAGE SYSTEM (BESS) EFFICIENCY AND ALTERNATIVES**

3.1. The co-located BESS infrastructure introduces considerable land use footprint and technical constraints. Lithium Iron Phosphate (LFP) chemistry limits effective cycling to roughly once per day and degrades rapidly if sustained at full state-of-charge (SoC).

3.2. Questions for the Applicant:

- Given the operational constraints of lithium iron chemistry—including the daily cycling limit and degradation risks when held at maximum capacity—how can the applicant justify tying this massive storage system strictly to intermittent co-located solar generation?

- Would it not be far more efficient and less damaging to the local landscape to eliminate the solar array entirely, deploying a standalone BESS elsewhere to charge directly from the grid during existing low-demand periods?

#### **4. REGIONAL OVER-SUPPLY AND NESO GRID CONSTRAINTS (GATE 2)**

4.1. The necessity of a 500MWac generation asset in this specific region is highly questionable. The local distribution and transmission network boundaries (specifically the Network S6 and S7 boundaries) are heavily saturated with existing and pipeline energy generation assets.

4.2. Questions for the Applicant:

- Is it not the case that the local Network S6 and S7 regional transmission zones are already heavily oversupplied with electricity?
- Can the applicant confirm if NESO (National Energy System Operator) has withheld or delayed a formal “Gate 2” connection agreement for this project precisely because the regional grid infrastructure lacks the capacity to absorb this surplus power?
- If the regional network cannot accept this electricity without massive, unconfirmed infrastructure reinforcements, what immediate “need” does this project serve under national planning policy?

#### **5. NATIONAL SECURITY AND AVIATION SAFETY (GLINT & GLARE)**

5.1. I note with grave concern the formal objection submitted by the Ministry of Defence (MOD) during the Examination process regarding the potential glint and glare impacts arising from the proposed development and the implications for operations at RAF Marham.

5.2. The continued existence of a substantive MOD objection should be afforded significant weight by the Examining Authority. Aviation safety and operational effectiveness at RAF Marham are matters of national importance and should be fully resolved before any recommendation is made.

5.3. Questions for the Applicant:

- How can the Applicant demonstrate, with a high degree of certainty, that pilot visibility, mission planning, training activities, sensor systems and operational capability at RAF Marham will not be adversely affected by direct or secondary glare from the proposed solar arrays?
- What evidence exists from operational solar installations of a comparable scale demonstrating that glint and glare effects can be reliably eliminated in circumstances similar to those at RAF Marham?
- What specific mitigation measures are proposed, and what independently verified evidence demonstrates that such measures would be effective throughout the operational life of the project?

- If residual impacts remain after mitigation, how does the Applicant consider the proposal to be compliant with the relevant requirements of the National Policy Statements regarding aviation safety and national security interests?

5.4. I respectfully request that the Examining Authority require the Applicant to respond directly to the concerns raised by the Ministry of Defence and clearly demonstrate how those concerns have been resolved. If the objection remains outstanding, I submit that significant weight should be attached to that fact when assessing the application.

## **6. HERITAGE, VISUAL LANDSCAPE, AND DARK SKIES**

6.1. I am concerned that the scale of the proposed 500MWac development has the potential to affect the rural landscape character of the area and the setting of designated heritage assets, including Castle Acre Castle and Priory.

6.2. The setting and significance of these heritage assets are matters to which the Examining Authority must have regard under the National Planning Policy Framework and NPS EN-1, and any harm to their setting should be clearly identified, justified and weighed in the planning balance.

6.3. Questions for the Applicant:

- What heritage impact assessment has been undertaken in respect of Castle Acre Castle and Priory, and what conclusions does it reach regarding the effect of the proposed development on their setting and significance?
- What specific mitigation measures are proposed to address any identified landscape and visual effects, and what evidence demonstrates that these measures will remain effective over the lifetime of the project?
- What measures are proposed to limit light pollution from the substations and Battery Energy Storage Systems (BESS), and what monitoring or enforcement mechanisms would ensure these measures are adhered to throughout the operational life of the site?
- What evidence supports the Applicant's position that the proposed habitat mitigation for avian species would deliver a measurable ecological net gain, and how does this compare with the ecological value of the existing, undisturbed habitat?

6.4. I respectfully request that the Examining Authority require the Applicant to provide clear evidence addressing these matters, and to give appropriate weight to any unresolved or unquantified harm to heritage assets, landscape character, dark skies and biodiversity when reaching its recommendation.

## **7. CUMULATIVE REGIONAL IMPACTS**

7.1. I am concerned that this proposal falls to be considered alongside a number of other existing, consented and proposed solar and grid infrastructure projects across West and South Norfolk,

and that the cumulative effects of these projects on the local community have not yet been fully demonstrated.

7.2. NPS EN-1 requires that the cumulative effects of a proposed development, taken together with other relevant projects, are properly assessed. This is particularly important in this case given the concentration of energy infrastructure proposals within the wider region.

7.3. Questions for the Applicant:

- What methodology has been used to assess the cumulative effects of this proposal alongside other existing, consented and proposed energy infrastructure projects in the region, and which specific projects have been included in that assessment?
- What evidence has the Applicant provided regarding the combined impact of these projects on the local rural road network, including construction traffic and any necessary highway improvements?
- What assessment has been undertaken of the cumulative effect of multiple projects on soil condition and long-term agricultural productivity across the wider area?
- What consideration has been given to the cumulative effect of this scale of development on community identity and the lived experience of residents in the surrounding area?

7.4. I respectfully request that the Examining Authority require the Applicant to provide a clear, evidence-based cumulative effects assessment addressing these matters, and to give appropriate weight to any cumulative harm that has not been adequately assessed or mitigated.

## **8. CONCLUSION**

8.1. I remain concerned that significant questions regarding agricultural land use, battery storage efficiency, grid capacity, aviation safety, heritage impacts, biodiversity outcomes, dark sky protection, and cumulative regional effects have not yet been satisfactorily addressed.

8.2. I respectfully request that the Examining Authority require the Applicant to provide clear, detailed and evidence-based responses to the matters identified in this Written Representation, supported by appropriate technical assessments and independently verifiable data where necessary.

8.3. In particular, I request that the Examining Authority carefully examine:

- The justification for the use of Best and Most Versatile agricultural land and the resulting implications for long-term food production;
- The technical justification for tying a battery energy storage system of this scale to intermittent co-located solar generation, including the operational and efficiency implications of doing so as opposed to alternative configurations;

- The existing capacity constraints on the Network S6 and S7 boundaries and whether the Applicant has demonstrated, with reference to NESO's position, that the regional network can accommodate this scale of generation without unconfirmed reinforcement works;
- The outstanding concerns raised by the Ministry of Defence regarding glint and glare impacts on RAF Marham operations;
- The potential effects on the setting and significance of heritage assets, including Castle Acre Castle and Castle Acre Priory;
- The effectiveness, enforceability and long-term viability of proposed mitigation measures relating to landscape character, biodiversity and dark sky protection; and
- The cumulative effects of this proposal when considered alongside other existing, consented and proposed energy infrastructure projects within the wider Norfolk area.

8.4. While I recognise the distinct regulatory and commercial pathways for nuclear and solar technologies within the UK planning framework, I urge the Examining Authority to weigh the scale of land-take required by this 825-hectare proposal against the comparatively minimal spatial footprint of equivalent clean baseload alternatives, such as Small Modular Reactors, when considering the overall planning balance.

8.5. I further request that the Examining Authority give careful consideration to the evidence submitted by statutory consultees, including the Ministry of Defence, and require the Applicant to respond directly to any unresolved concerns raised during the Examination.

8.6. Where objections or concerns remain outstanding, particularly those relating to aviation safety, national security, heritage protection, agricultural land use, grid capacity and cumulative impacts, I submit that the burden of proof rests with the Applicant to demonstrate compliance with the relevant provisions of the National Policy Statements.

8.7. Until these matters have been fully examined and evidenced, I consider that the application has not yet demonstrated that its adverse impacts have been adequately understood, mitigated or justified. I therefore respectfully request that the Examining Authority apply rigorous scrutiny to the Applicant's case and ensure that the requirements of the relevant National Policy Statements are demonstrably satisfied before reaching any recommendation.