

Written Representation – Response to ExQ2

The Droves Solar Farm — Application Reference: EN010013

Examining Authority's Second Written Questions (ExQ2) — Deadline 3 Submission

Interested Party Reference number: [REDACTED] Antony Morgan

15th July 2026

1. Introduction

I am a local resident near the site of the proposed Droves Solar Farm and am registered as an Interested Party in this examination. I am submitting this response to the Examining Authority's Second Written Questions (ExQ2), issued 2 July 2026, in respect of the questions set out below. I have commented only on those questions most relevant to my interests, as permitted by the ExA's covering note. I also ask the Examining Authority to consider putting the additional questions set out in Section 3 to the applicant, particularly regarding flood risk at the BESS and substation compound.

2. Comments on ExQ2 Questions

Q1.0.1 Proposed ground levels – substations and BESS

I support the Examining Authority's request for cross-section drawings and confirmation that the modelled ground levels for the National Grid substation, Customer Substation and BESS have been used consistently across the flood risk, landscape and visual, and noise assessments. I am particularly concerned that if the applicant has not modelled these structures consistently, the flood risk assessment may understate the true risk to this infrastructure, and the landscape and visual assessment may understate visibility from nearby properties. I ask that the applicant's response to part (v) of this question — regarding consistency with the flood risk assessment — be scrutinised closely, and cross-referenced against the applicant's response to Q8.0.2 below.

Q8.0.2 The Sequential Approach and mitigation of pluvial flood risk

I share the Examining Authority's concern that more vulnerable elements of the development, which I understand to include the BESS and substation compound, may be sited in areas of pluvial flood risk. I note the applicant's own submission that pluvial flow paths would be managed by the proposed SuDS system, including capacity for fire-suppressant volumes associated with the BESS. Given the safety implications of flooding at a BESS compound specifically, I ask that the applicant be required to demonstrate — with modelling, not assertion — that SuDS capacity at the BESS and substation footprint specifically (not just as an aggregate across the wider site) is adequate for the combined rainfall, fire-suppressant and off-site pluvial flows identified.

Q8.0.6 and Q8.0.7 Unresolved flood risk issues with the Lead Local Flood Authority

I note with concern that the Statement of Common Ground between the applicant and Norfolk County Council as Lead Local Flood Authority records four issues rated 'red' — meaning both parties agree they cannot currently agree — alongside a number of unresolved 'amber' issues. I ask that these red-rated matters be resolved, with supporting technical evidence, before the examination closes, and that the applicant's timetable for doing so (requested at Q8.0.7) make specific reference to how the BESS and substation compound are affected, given their location on relatively higher, but not risk-free, ground within the site.

Q10.0.1 Siting of the substation and BESS

I note Natural England has raised concerns regarding the siting of the substation and BESS, and that the applicant's position is that re-siting is not required. I ask the Examining Authority to press Natural England to confirm, in clear terms, whether it is fully satisfied with the applicant's response, or whether its concerns (including in relation to flood risk and soils) remain only partially addressed.

Q11.0.1, Q11.0.2, Q11.0.4, Q11.0.5 Landscape and visual effects

I ask the applicant to provide clear and consistent evidence on: (i) the dimensions and permanence of the field margin relied upon for residential visual amenity assessment at Keeper's Cottage; (ii) the apparent discrepancy in

pylon heights shown at Viewpoint 12 () between the photowire and photomontage figures; (iii) how protection of Bartholomew's Hill Plantation, including long-term maintenance of screening planting, will be secured in the dDCO; and (iv) why the cumulative landscape and visual effects assessment excludes development beyond a 3km search area, which in my view does not adequately capture the cumulative change to this part of the landscape.

Q14.0.2 Safe operation of the BESS

I ask that Norfolk County Council's response confirm, in specific and unambiguous terms, whether Norfolk Fire and Rescue Service's requests regarding safe BESS operation have been fully satisfied, including in relation to fire suppression water management and its interaction with site drainage and flood risk (see Q8.0.2 above).

Q5.0.1 Decommissioning funding

I note the applicant's Funding Statement does not currently address decommissioning costs. Given the scale of the BESS, substations and grid connection infrastructure, I ask that the applicant be required to provide a revised funding statement demonstrating decommissioning is adequately funded before the examination closes.

3. Additional questions requested of the Examining Authority

Flooding at the BESS and substation compound

The existing ExQ2 questions address flood risk generally (Section 8) and ground levels for the BESS/substation generally (Q1.0.1), but do not ask the applicant to address flood risk specifically and separately for the BESS and substation footprint. I would ask the Examining Authority to consider putting the following additional questions to the applicant:

- (1) Could the applicant confirm the Flood Zone classification and the specific pluvial and fluvial flood risk (in mm/hr and return period terms) applicable to the footprint of the BESS and both substations, as distinct from the site-wide assessment?
- (2) Given the vulnerability classification of the BESS and substations under NPS EN-1 (essential infrastructure), could the applicant confirm what flood mitigation measures (e.g. raised plinth levels, bunding, sealed cable ducts, sub-surface drainage) are proposed specifically at these structures, and how these would be secured as requirements in the dDCO?
- (3) Could the applicant confirm whether the SuDS capacity calculations referenced in response to Q8.0.2(ii) have been modelled separately for the BESS/substation compound, accounting for its own impermeable area and fire-suppressant water volumes, rather than only as part of an aggregate site-wide calculation?
- (4) Could the applicant confirm whether the Environment Agency's updated Flood Map for Planning (May 2026, referenced at Q8.0.5) has been used to re-assess flood risk specifically at the BESS and substation footprint, and if not, when this will be done?
- (5) In the event of a flood event coinciding with a BESS fire incident, could the applicant set out what contingency drainage or containment measures are proposed to prevent contaminated fire-suppressant water combining with flood water and reaching watercourses?

Ministry of Defence / RAF Marham objection

I note that the Examining Authority's aviation question (Q2.0.1) asks only for an outline timetable of the applicant's engagement with the Defence Infrastructure Organisation (DIO), and does not test the substance or current status of the Ministry of Defence's (MoD) objection to this scheme. Given that the MoD has publicly objected on the grounds that the reflective materials used in the solar arrays could interfere with RAF Marham's precision approach radar, and that glint and glare could dazzle pilots and air traffic control staff, and given RAF Marham's status as the home of the UK's F-35 Lightning force, I consider this to be a matter of national security significance that warrants more detailed scrutiny than is currently provided for in ExQ2. I would ask the Examining Authority to consider putting the following additional questions to the applicant and, where appropriate, directly to the MoD/DIO:

- (1) Could the applicant confirm the current, up-to-date position of the Ministry of Defence/DIO, specifically whether its objection to the proposed development has been formally withdrawn and, if not, what outstanding matters remain unresolved?

(2) Could the applicant provide the technical evidence and assessments (including any glint and glare study and any radar impact assessment) submitted to the MoD in support of its case, and confirm whether the MoD's own technical experts have reviewed and formally accepted these assessments?

(3) Could the applicant confirm the specific content and current status of the 'management plan' that the MoD has indicated is required, and confirm whether this would be secured as a requirement in the dDCO, rather than as an informal or non-binding commitment?

(4) Given that the MoD is the recognised technical authority on operational safety for RAF Marham and the F-35 Lightning force based there, could the applicant explain what its position would be, and what the implications for the development would be, if the MoD's objection remains unresolved by the close of the examination?

(5) Could the applicant confirm whether any changes to panel specification, orientation, layout, or removal or the design or siting of new pylons have been made, or are proposed, specifically to address the MoD's radar interference and glint/glare concerns, and where in the application documents this is recorded?

(6) As the DIO/MoD does not appear to have a dedicated question directed to it in ExQ2, could the Examining Authority ask the DIO/MoD to confirm directly, and in writing, whether its objection remains live and, if so, precisely what changes to the application would be required for it to be withdrawn?

4. Conclusion

I ask the Examining Authority to take the above comments into account, and to put the additional questions in Section 3 to the applicant and relevant statutory consultees, given the unresolved flood risk issues already identified with the Lead Local Flood Authority, the potential for the BESS and substation compound to be a particular point of vulnerability, and the unresolved objection from the Ministry of Defence regarding RAF Marham. I would be grateful for confirmation that this response has been received and will be considered as part of Deadline 3.

Antony Morgan

15th July 2026