

Interested Party Reference Number: [REDACTED]

APPLICATION BY INDEPENDENT RENEWABLES (THE DROVES) LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE DROVES SOLAR FARM (PROJECT REFERENCE: EN0110013)

WRITTEN REPRESENTATION BY ANTONY MORGAN

DEADLINE: Deadline 3

DATE: 28TH JULY 2026

1. INTRODUCTION AND EXECUTIVE SUMMARY

1.1 This Written Representation is submitted by ANTONY MORGAN regarding the Development Consent Order (DCO) application for The Drovers Solar Farm.

1.2 As an Interested Party, my representation focuses strictly on the "Need Case" and localized constraints under the updated National Policy Statements (NPS) framework. I contend that while the Overarching NPS for Energy (EN-1) establishes a generic national need for low-carbon generation, the applicant has failed to justify the necessity of this massive 650MW facility at this specific, transmission-trapped location.

1.3 In summary, this representation demonstrates that:

The project fails to satisfy local demand and introduces cumulative land-use conflicts not resolved by generic policy.

Severe regional transmission barriers (the EC5 boundary) conflict with the grid delivery expectations outlined in NPS EN-3.

The project creates an undue burden on national balancing costs, meaning its designation as Critical National Priority (CNP) infrastructure is invalidated by severe local and systemic network constraints.

2. REGIONAL OVER-SUPPLY AND CUMULATIVE SITE IMPACTS UNDER NPS EN-3

2.1 Section 2.10 of NPS EN-3 dictates that site selection must carefully balance generation capacity against local impacts. The East Anglia region acts as the primary landing zone for multi-gigawatt offshore wind farms (including East Anglia Three, Norfolk Vanguard, and Hornsea projects). Local demand within Norfolk and Suffolk is low and entirely eclipsed by these locked-in offshore wind assets.

2.2 The applicant's proposal cannot be evaluated in a policy vacuum. The Drovers Solar Farm spans over 2,000 acres of rural landscape north of Swaffham. Crucially, it sits directly adjacent to another proposed mega-project, the 4,000-acre High Grove Solar scheme.

2.3 Together, these projects threaten to flood a localized, low-demand rural pocket with an unprecedented volume of intermittent generation. This structural over-supply violates the balanced deployment intentions of NPS EN-3 by creating a high concentration of land conflict without serving any unmet localized demand.

3. THE EC5 BOUNDARY CONSTRAINT AND GRID FEASIBILITY (NPS EN-1)

3.1 While NPS EN-1 establishes that the Secretary of State should act on the basis that the general need for renewable infrastructure is demonstrated, Section 4.1 explicitly allows for specific local connection realities to alter the decision-making weight.

3.2 According to the National Energy System Operator (NESO) Existing Agreement (EA) Register, this project under System ID 48882 requires a massive 650MW Solar PV capacity commitment.

3.3 The physical infrastructure required to safely export power from this specific area to major demand centers (such as London) does not exist. The applicant plans to connect via an entirely new Swaffham 400kV National Grid Substation, tapping directly into the existing Walpole-to-Necton 400kV overhead line.

3.4 This specific overhead line is a critical, highly congested corridor within the EC5 boundary and its Network S6/S7 sub-boundaries. Adding 650MW of solar generation here directly clashes with NPS EN-1 principles regarding efficient transmission planning, as it forces NESO to pay to curtail (turn off) local generation to maintain grid stability.

4. INEFFECTIVENESS OF BESS AND THE CNP BALANCE EXCEPTION

4.1 The applicant attempts to leverage the Critical National Priority (CNP) provisions of the January 2026 NPS update by proposing a massive co-located Battery Energy Storage System (BESS). This includes a dedicated 25-acre compound for Lithium-ion batteries and 20 acres for high-voltage substations with equipment scaling up to 15 metres high.

4.2 While the system ID register shows a substantial 500MW BESS capacity commitment, a battery only defers the injection of power into the grid; it does not expand structural network capacity.

4.3 During periods of high solar output, generation coincides with peak offshore wind output. Because this 500MW battery footprint is physically bound to the exact same trapped Walpole-to-Necton 400kV overhead line, it will be unable to discharge its stored energy when the wider EC5 boundary is congested.

4.4 The 2026 NPS revisions note that even CNP infrastructure must be weighed against severe systemic or environmental detriments. Because the BESS is structurally constrained from balancing the network at this node, the project will increase consumer-funded balancing costs without delivering usable power, failing to meet the criteria for urgent national benefit.

5. CONCLUSION AND REQUESTED ACTIONS

5.1 For the reasons detailed above, I respectfully submit that the applicant has failed to establish a robust supply-and-demand or grid-compliant case under NPS EN-1 and EN-3.

5.2 The project represents a net-negative addition to the UK energy network by increasing consumer-funded balancing costs without delivering usable power to major demand hubs.

5.3 I urge the Examining Authority to recommend the refusal of this DCO application.

Alternatively, the Secretary of State should legally restrict connection permissions until major regional grid infrastructure upgrades (such as the Norwich to Tilbury project) are fully operational to avoid critical network impairment.

Signed:

Antony Morgan