

George Freeman MP
Member of Parliament for Mid Norfolk
Droves Farm Planning Inspectorate Hearing Submission

9th September 2026

As Member of Parliament for Mid Norfolk, I am submitting this further written representation to the Planning Inspectorate ahead of Issue Specific Hearings 2 and 3 (8–9 September 2026) in the examination of The Droves Solar Farm (EN0110013). Details are as follows:

Further submission: Objection to the Droves Solar Farm application maintained — cumulative impacts with High Grove should be given the same scrutiny as the Examining Authority's other action points

1. Summary: the objection stands

- My objection of 2 June 2026 (Deadline 1) is maintained in full. As the Examination now moves into Issue Specific Hearings 2 and 3, the central deficiency I raised remains unresolved: **the cumulative effect of Droves and High Grove taken together has not, to my knowledge, been tested with the same rigour as the other matters the Examining Authority has pressed the Applicant on.**
- I note the Examining Authority has already required the Applicant to address, among other matters, the impact on food production from the loss of agricultural land. I welcome this and address it further below. I have not seen equivalent, explicitly cumulative scrutiny applied to the combined effect of Droves and High Grove, and I ask that this gap be closed at ISH2/ISH3.
- Renewable generation is supported in principle. The policy test is whether significant adverse impacts have been satisfactorily addressed. On the evidence before the Examination, the cumulative case has not.

2. Cumulative impacts: defining the correct scale of assessment

- Cumulative impact should not be reduced to a single measure of effect on the constituency. It operates at several distinct scales, and each requires separate, explicit assessment:

Local scale

- Approximately 25 villages in Central/Mid Norfolk lie within the zone of influence of the proposed High Grove and Droves schemes alone. This is the scale at which residents experience the greatest immediate effect — on views, on daily life, and on the character of the villages between the two sites.

Sub-regional scale: the emerging "Central Norfolk Solar Belt"

- Taken together with other proposed and reasonably foreseeable schemes, Droves and High Grove form part of an emerging corridor of industrial-scale solar development stretching from Castle Acre in the west towards Poringland in the east — in effect, a west-to-east "Central Norfolk Solar Belt" cutting across the county. This has a materially different, and materially greater, cumulative impact on landscape character

and the tourism economy than any assessment confined to the villages immediately adjoining a single site.

County scale: the magnet effect

- The evidence available to me suggests that once an area is identified as having suitable grid connectivity, it becomes a magnet for further applications, as developers and landowners pursue guaranteed subsidy income. Land-agent reports indicate c.20,000 acres of further solar development "in the pipeline" locally.
- Approving Drovers alongside High Grove would reinforce Central Norfolk's position as a target area for this pipeline, with a cumulative knock-on impact on agricultural investment and production across one of the UK's leading agricultural counties, not merely on the two sites under examination.

Cumulative risk and footprint

- Cumulative impact is not only a question of combined land area. Operational risks — fire, noise, and glare among them — are assessed scheme by scheme, but I have seen no assessment of how these risks are magnified when multiple large-scale solar and battery storage sites sit in close proximity along the same corridor. I ask the Examining Authority to require the Applicant to assess cumulative impact at each of these scales, at local, sub-regional, and county level, and to assess cumulative risk as well as cumulative footprint.

Cumulative impact on the local economy

- Where farms convert wholesale to solar generation and cease agricultural production entirely, the effect is more severe than a gradual, pro-rata, loss of output implies, and this distinction has not, to my knowledge, been assessed cumulatively across the Solar Belt.
- Norfolk's rural tourism economy depends on the visual and historic character of this landscape. A continuous corridor of industrial-scale infrastructure across Central Norfolk risks displacing visitors towards more attractive landscapes elsewhere in the county or beyond, with a knock-on effect on the businesses, jobs, and local supply chains that depend on that visitor economy.
- I ask that the Applicant's socio-economic assessment address these cumulative effects on farming employment, tourism-related jobs, general investment into the region and local supply chains across the Solar Belt as a whole, rather than site by site.

Cumulative impact on habitats and wildlife corridors

- The combined footprint of Drovers, High Grove, and the further schemes reportedly in the pipeline would, if consented without coordinated assessment, create a continuous belt of industrial-scale infrastructure many miles in length across Central Norfolk. I am not aware of any assessment of what a barrier of this scale would mean for the movement and migration of local flora and fauna, as distinct from the habitat loss and fragmentation assessed at each individual site such as this one.
- I ask the Examining Authority to require the Applicant to produce, or commission, a landscape-scale ecological connectivity assessment addressing the *cumulative* effect of the emerging Solar Belt on wildlife corridors, rather than relying solely on site-specific habitat assessments.

Testing this at ISH2/ISH3

- Following Issue Specific Hearing 1, the Examining Authority published action points requiring the Applicant to, among other things: meet the Defence Infrastructure Organisation on RAF Marham radar and glint/glare mitigation; confirm whether road safety audits considered deer-vehicle collision risk; justify solar over wind turbines in writing; and address the impact on food production from the loss of agricultural land.
- These are welcome and necessary. But I have seen no equivalent requirement that the Applicant demonstrate, at the same level of rigour, the multi-scale cumulative effects set out above. I ask the Examining Authority to confirm at ISH2/ISH3 whether cumulative assessment — at local, sub-regional, and county scale, and covering economic and ecological effects — has in fact been the subject of a distinct action point, and if not, to set one.

3. Agricultural land use, food production, and soils: building on the Examining Authority's own action point

- I welcome the Examining Authority's requirement that the Applicant address the impact on food production from the loss of agricultural land. This goes directly to the concern I raised at Deadline 1.
- I ask that the Applicant's response be tested against the correct scale of assessment. My understanding is that the Applicant's food-security case has rested on a national comparison — that the land taken represents a fraction of a percent of the UK's total utilised agricultural area. That figure, even if accurate, does not answer the Examining Authority's question: the effect on food production in this part of Norfolk, taken cumulatively with High Grove, not against a national baseline that renders any single scheme statistically negligible by design.
- Both Natural England and the Applicant agree that over half the site is Best and Most Versatile land (Natural England: 54%; Applicant: 51.7%). Combined with High Grove's own BMV land take, this is, in my view, hugely significant for a mostly rural & partly semi-rural constituency whose economy depends on productive farmland, and should be assessed as such.
- I have seen no evidence that the Applicant's response addresses long-term soil health, consisting of structure degradation, organic matter loss, and reinstatement, across a 30–40-year operational life, in combination with High Grove. I ask that any grant of consent be conditional on binding, monitored soil recovery commitments, assessed cumulatively with neighbouring schemes rather than in isolation.
- This is not a speculative concern. A seven-year field study by the University of Tuscia in Italy (2022) found that ground-mounted solar installations produced an uneven pattern of change in soil salinity, temperature, water cycling and organic matter beneath panels, compared with surrounding land. A 2022 Welsh Government evidence review identified soil compaction as a key risk of solar PV development, noting that deep compaction can take many years to reverse and, in some cases, may be permanent, and that significant evidence gaps remain around recovery times and the long-term effects of buried infrastructure over a comparable operational life. A 2025 study funded by the Natural Environment Research Council further concludes that the effects of solar farms on plants and soil need to be monitored throughout development and assessed against local conditions, and that how to address the legacy of prior agricultural use remains an open research question.

- Given this body of evidence, the Environmental Statement's lack of binding soil recovery plans and monitoring is a substantive deficiency, and I ask that it be treated as such by the Inspector.

4. Grid connection: has the material unknown been resolved?

- At Deadline 1, the application did not fix the point of connection, cable route, or substation siting, which I said made it impossible to lawfully assess worst-case effects or propose targeted mitigation.
- I ask the Examining Authority to confirm, at ISH2/ISH3, whether the grid connection location and route have now been fixed and fully assessed, including their onshore cable and substation routes, or whether this remains a live gap in the Environmental Statement.
- If the connection route remains undecided, the fundamental EIA deficiency I raised in June persists: no cumulative analysis with High Grove is possible without route certainty.

5. Requested outcome

- I maintain my request that the application be refused or, at minimum, deferred pending: (i) an explicit, itemised cumulative assessment of agricultural, landscape, economic, traffic, and ecological effects with High Grove and the wider Solar Belt, conducted at local, sub-regional, and county scale, and tested at the same standard as the Examining Authority's other action points; and (ii) confirmation of a fixed grid connection route, fully assessed for its onshore effects.
- I would be grateful if the Examining Authority would press the Applicant on both points at Issue Specific Hearings 2 and 3, and I look forward to the outcome of that examination.

Yours sincerely,

George Freeman MP
Member of Parliament for Mid Norfolk