



16 September 2026

RE: The Drovers Solar Farm (EN0110013) – Deadline 4 submission

As the MP for North West Norfolk, I submit this representation in relation to the Development Consent Order (DCO) application for The Drovers Solar Farm. It follows my interventions at the third Issue Specific Hearing (ISH3) and second Open Floor Hearing (OFH2) on 9 September. The issues outlined below reflect constituents' concerns and materially affect the planning acceptability and deliverability of the proposal.

Cumulative Impact and Agricultural Land Loss

Under National Policy Statement (NPS) EN-1 (paragraph 4.3.15), NPS EN-3, and National Planning Policy Framework (NPPF), developers are expected to provide transparent evidence of alternative locations, favouring commercial rooftops or brownfield land over productive agricultural land and actively avoiding Best and Most Versatile (BMV) farmland where possible. The Environmental Statement initially justified selecting this site based on desk-based mapping indicating the land was “likely to be some of the lowest quality land”. However, subsequent Agricultural Land Classification (ALC) field surveys established over 50% of the site is BMV farmland, with a further 40% classified as moderate quality. The Applicant failed to revisit site selection or re-evaluate alternative sites once that initial assumption was disproved.

While the Applicant treats the loss of BMV as a routine factor in the “planning balance”, this ignores the clear direction set out in national guidance to actively avoid Best and Most Versatile (BMV) farmland “where possible”. There is no absolute need to use this land when poorer quality could be preferred. Furthermore, relying on macro statistics - claiming a “negligible” 0.15% county impact and referring to Norfolk’s 94% BMV baseline - bypasses NPPF requirement that planning decisions must reflect local circumstances. Using Norfolk’s overall high agricultural quality to excuse developing prime farmland could set a precedent to justify industrialising most arable sites across East Anglia. Locally, Drovers and High Grove create a 6,700-acre contiguous solar sprawl that threatens domestic food security and involves the permanent, irreversible export of 250,000 tonnes of Grade 2 BMV topsoil from Field 27.

Defence Infrastructure, Radar Mitigation and NSIP Status

The Applicant has not resolved objections from the Defence Infrastructure Organisation (DIO) regarding risks to RAF Marham’s Precision Approach Radar (PAR). We learned during the hearings that potential mitigation includes earth bunds or fencing. While the Applicant was explicit 4.5 metres was the maximum these mitigations would be, the DIO representative explicitly said they may need to be higher than 4.5 metres to manage the risk to radar. That is a statement I relied on when referring that they “could” be higher than 4.5 metres. In the event DIO maintain higher mitigation is needed the Applicant said those arrays would not be built – and it would be a criminal offence to do so. That is welcome clarity.

However, it could be material to the application as these measures have not been fully designed, modelled or examined. DIO explicitly has not agreed that 4.5 metres will be sufficient. Why will respondents not have sight of the finalised mitigation plan during the Inquiry?

A key question is should those arrays not be built due to DIO assessment on height, what would the impact on the overall application be and its status as a NSIP application generating 500 MW? How much power generation in MW would be lost by removing these fields from the site? At para. 582 in the ISH3 the Applicant's representative made an assertion but with no specific answer. How is it acceptable to approve an application with this issue outstanding?

Bunds of this scale, potentially 20 metres wide at base, would be incongruous to the landscape - yet this is not covered in the Landscape and Visual Impact Assessment despite the likely scale.

Construction Traffic Management and Highway Safety

The proposal involves a two-year construction period generating between 600 and 622 daily two-way vehicle movements along the A1065 and A47. Local testimony identifies the A1065 as one of the most dangerous roads in the county, while Norfolk records the highest fatal road collision rate in the UK, yet no localised road safety risk assessment has been undertaken. Perimeter fencing may also funnel wild deer across high-speed stretches of the A1065, increasing collision risks. Deferring key routing, safety and mitigation measures to an outline Construction Traffic Management Plan after consent leaves important highway safety questions unresolved.

Decommissioning, Soil Protection and Groundwater Risks

The application does not provide a ring-fenced, legally secured decommissioning fund for the development, while key restoration details are deferred to later management plans. The Environment Agency has raised concerns regarding underground contaminated water tanks and removal of buried cables. Leaving plastic-coated cables and associated infrastructure in the ground after the scheme's operational life presents a potential risk of chemical leaching into the chalk aquifer feeding the River Nar. The Applicant has not demonstrated that complete cable removal and full ground reinstatement will be legally required and delivered.

Landscape Character and Heritage Setting Harm

The scheme would cause significant harm to significant heritage assets in the Nar Valley, including Castle Acre Priory, Castle Acre Castle, Bailey Gate, and the Grade I listed churches of St James and St George. The surrounding topography and agricultural landscape are intrinsic to their significance and to the historic character of the valley while use of the unique 11th-century Norman road diversion of the Peddars Way at Palgrave for heavy construction access raises concerns over its structural and historic integrity. Proposals to screen the solar arrays with hedgerows would lead to the moderate to high levels of negative impact with the loss of expansive, sequential, views of the countryside.

Substation Uncertainty

The required substation also remains unresolved. NGET has not committed to constructing infrastructure within the Order limits and has confirmed its review will not conclude until 2027 or 2028. NPS EN-1 paragraph 3.3.79 requires connected infrastructure to be demonstrably deliverable. Without a confirmed and binding grid connection point, the Applicant has not demonstrated the infrastructure can be delivered as proposed. The application remains premature.

In conclusion, the application leaves fundamental issues unresolved across site selection, loss of BMV agricultural land, defence impact, highway safety, decommissioning, groundwater protection, heritage and grid. These concerns go directly to whether the scheme is acceptable. I therefore urge the Examining Authority to recommend refusal of a DCO.

Yours sincerely,

James Wild MP