Submission ID: S5EA46BF0

The Applicant is avoiding the question of the very high level of historical public and private land sequestration in the area of the Brecks and NW Norfolk adjacent to the Swaffham by seeking to introduce the notion of the Norfolk cumulative percentage of national solar installations as the measure of social disturbance. This is a an unacceptable distorsion of an already frought reality as is described in the attached report.
Figure 1 is map of the two proposed solar installations, The Droves Project and the High Grove Project. It shows them to be within 800 yards of each other between Swaffham and Castleacre, and Swaffham and Necton and Ashill. comprising a total of 6,400 acres. Additionally, the Longmarsh Green Energy Project Between Swaffham and Downham Market has just been announced, comprising a further 4,700 acres for a mega-solar energy installation and data center. 11,100 acres of solar developments are being simultaneously proposed for an already land access-depleted environment. The almost wall-to-wall nature of country estate landholdings in this area of Norfolk appears also not to have been considered, as shown in the attached Figure 2 map, suggesting that these developments would be better placed almost anywhere else in Norfolk.

ADDENDUM TO WRITTEN REPRESENTATIONS: THE CUMULATIVE EFFECTS ASSESSMENT DEFICIENCY

Project Reference: EN0110013 - THE DROVES SOLAR FARM PROJECT
Submission Stage: Deadline 5 (Target: 16 October 2026)
Subject: Omission of Deep Baseline Historical and Spatial Compounding of Land Loss in West Norfolk

1. Introduction and Executive Summary

1.1 This representation challenges the legal and technical adequacy of the Cumulative Effects Assessment (CEA) Framework deployed by the Applicant (Island Green Power).

1.2 To date, the examination has assessed cumulative impacts through a narrow, forward looking lens., examining only contemporaneous or pipeline ground-based solar-related developments (**Figure 1**); there extraordinary regional imbalance created by the proposed by the Swaffham solar developments, however is clear from this cartographic evidence using the Applicant's mistaken compounding criteria.

1.3. This representation argues that the Applicant's Environmental Statement (ES) suffers from a **methodological baseline paradox.** By "baselining out" there past, the Applicant treats the the current landscape as an infinite, empty canvas. In reality, Swaffham and the wider West Norfolk landscape have suffered a colossal, century-long systemic subtraction of territory to state, military, industrial, and hereditary enclosures.

1.4. When the true cumulative baseline is evaluated, it becomes clear that the remaining independent agricultural and communal fabric of this region has reached a **critical saturation threshold.** It cannot absorb the additional 2,800-acre industrial footprint of The Droves without irreversible regional collapse in landscape character and food security - yet further undermined by the adjacent proposed 4.000-acre High Grove solar and battery storage project (RWE).

2. The Legal and Methodological Flaw: "Salami-Slicing" of the Baseline

2.1 Under the National Planning Policy framework (NPPF) guidelines and Planning Inspectorate iInfrastructure standards, a lawful CEA must evaluate the local compounding pressure on a receiving environment.

2.**2** The Applicant's assessment relies on "salami-slicing" the landscape - treating the 2,800 -acre subtraction as an isolated event. This ignores the reality of **historical compounding.**

2.3. Because massive swaths of the regional territory have already been permanently sequestered, the remaining open agricultural land surrounding Swaffham is a finite, scarce and critically vulnerable resource.

3. Typology of Historical Land Subtractions - the True Cumulative Baseline

3.1 The STANTA Void and Air Defense Exclusionary Saturation (The Military Deficit)

- **The Spatial Reality**: The establishment of the Stanford Training Area (STANTA) in 1942 did not merely pause agriculture; it permanently excised **47 square miles (approximately 30,000 acres)** of the Norfolk Brecks. By entirely evacuating five historic parishes (Stanford, Tottington, Langford, Sturston, and West Tofts), the State created a massive permanent territorial void.

- **The Planning Compounding:** When combined with the heavy infrastructure footprints and strict radar/ flight vector restrictions of RAF Marham, RAF Lakenheath, and RAF Mildenhall, West Norfolk operates under a profound "military sterilization" deficit•.

- **The Cumulative Argument:** The Applicant's Environmental Statement treats the Swaffham corridor as an open landscape with endless capacity to absorb infrastructure. In reality, the Ministry of Defense has already locked up or heavily restricted a vast percentage of the regional territory for national security. Because the State has already permanently claimed these immense tracts of West Norfolk, the remaining independent arable land surrounding Swaffham is a finite premium. Forcing a further 2,800-acre industrial project (6,800-acre when including the High Grove Project) into this squeezed corridor represents an irrational over-saturation of national-tier land requirements within a single rural locality.

3.2 Monopolisation of Forestry Territory - The Thetford Forest Precedent

- **The Spatial Reality:** Spanning **72 square miles (over 46,000 acres),** Thetford Forest is the largest lowland pine forest in England. Established by the Forestry Commission in the interwar period to address a national timber shortage, its creation permanently altered the agricultural potential of the region.

- **The Planning Compounding:** While most of the forest serves ecological and recreational purposes today, its historic establishment systematically blanketed a vast expanse of the Brecks landscape, pushing its structural boundaries directly up towards the Swaffham and South Acre corridors.

- **The Cumulative Argument:** The creation of England's largest lowland forest represents a massive, permanent state-directed conversion of Norfolk land away from agricultural food flexibility. When an environment has already given up 72 square miles yo single-use state

forestry, and a further 47 square miles to army training, additionally with three large RAF and American air bases, the baseline has been fundamentally depleted. The Planning Inspectorate cannot lawfully evaluate the "acceptability" of loosing another 2,800 acres (or a combined 6,800 acres) of open arable land to industrial energy factories without factoring in that the local agricultural economy is already operating within a highly constrained territorial remnant.

3.3 Industrial Mineral Extraction Corridors - The Silica Sand Deficit

- **The Spatial Reality:** The geographic corridor running between Swaffham and Kings Lynn contains some of the UKs most critical deposits of high-purity silica sand (essential for industrial glass and ceramic manufacturing). Many decades of open-cast quarrying - notably around the Leziate, Bawsey, Mintlyn, and East Bilney complexes - have systematically hollowed out thousands of acres of the regional topography.

- **The Planning Compounding:** Unlike standard aggregate quarrying, silica sand extraction requires deep. Long-term surface mining that fundamentally strips the topsoil, permanently alters complex sub-surface water tables, and frequently leaves behind deep water-filled voids. The area, including the Nar Valley, is pockmarked by large, water-filled 'lakes' as the consequence of 200 years of silica sand, gravel, and carstone mining.

- **The Cumulative Argument:** The industrial extraction has already fractured the historical landscape and permanently removed massive tranches of West Norfolk's terrain from traditional agricultural rotation. The Applicant's Environmental Statement treats the land resource around Swaffham as if it has an infinite capacity to absorb industrial degradation. In reality, the region has already paid a heavy territorial toll to supply the nation's industrial sand demands, with continuing long-term quotas required. Adding a 2,800-acre (or 6,800- acre) surface-covering solar array into an environment already scarred by vast mining voids creates an unacceptable cumulative concentration of heavy industrial land-use within a single rural district.

3.4 Hereditary Enclosure & Private Concentration - The 70% Territorial Lock

- **The Spatial Reality:** West Norfolk contains one of the most dense aggregations of major country estates in the United Kingdom. Dominated by sprawling holdings such as the Sandringham estate, Houghton Estate, Holkham Estate, and the immediate West Acre and Narford Hall Estates. Upwards of 70% of the land in West Norfolk remains privately held by a small number of generally hereditary landowners.

- **The Planning Compounding:** Because these historic estates are fiercely preserved under strict generational conservation mandates, environmental trusts, and private sporting interests,

their massive internal borders are dynamically closed off to national and local utility and infrastructure placement.

- **The Cumulative Argument:** This creates a profound structural squeeze on the regional land market. Because 70% of the territory is effectively locked away from infrastructural development, national energy demands are disproportionately forced into the the narrow remaining slivers of independent tenant farmland and un-enclosed parcels surrounding communities like Swaffham, Sporle, South Acre, and Ashill. It is ironic that the land involved in the Droves Development is derived from the periphery of the Narford Hall Estate (if well away from Norford Hall) but this opportunistic exception does not change the territorial realities. The Planning Inspector must recognize that thee local community is operating under a unique spatial deficit: the public and independent agricultural sphere is being compressed between the "un-touchable" boundaries of the greater and lesser private estates on one side, and massive corporate energy developments on the other. The map of West Norfolk from the website, "Who Owns Norfolk" eloquently makes this point (**Figure 2**)

4. Impact on Agricultural Capability and National Food Security

4.1 The Applicant argues that the loss of arable land for the Droves Project is statistically negligible when compared to the UK as a whole. This is a false metric.

4.2 Because STANTA, the multiple Air Defense assets, the Thetford Forest, and silica sand (and related) quarrying have removed over 130 square miles of West Norfolk's land from the flexible agricultural market. The intensity of regional country estate enclosure, and the high frequency of wet woodland and wetland, residues of the formerly extensive West Norfolk Fen have removed a significant additional increment. Lowland heath also remains a characteristic of the Brecks. The remaining independent arable land is of critical regional and national importance.

4.3 To allow a further 2,800 acres of largely high-grade food-producing soil in this regional locality to be "sterilized" under glass panels for up to 6o years, with an immediately adjacent solar project covering a further 4,000 acres, ignores the cumulative deficit under which the local agricultural economy already operates.

5. Conclusion and Action Required from the Examining Authority

5.1 The Examining Authority is urged to reject the Applicant's narrow definition of cumulative impact.

5.2 We formerly request that the Lead Inspector instruct the Applicant to submit a Supplementary Cumulative Impact Statement that explicitly factors in the historical, spatial, and structural land-loss pressures detailed in this addendum.

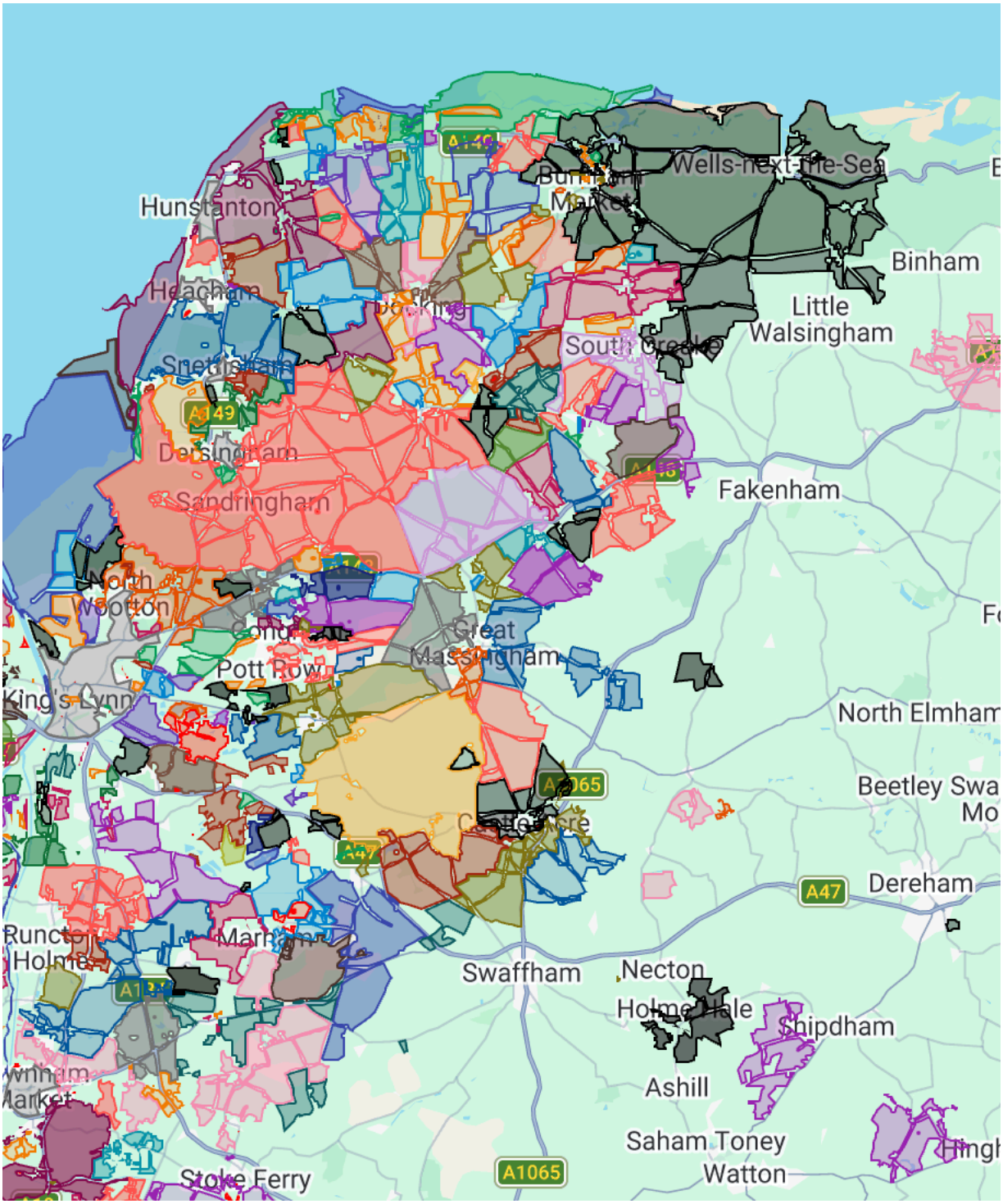
5.3 If the developer cannot prove that the regional ecosystem and agricultural economy can withstand the cumulative over-saturation, development consent must be refused.
5.4 We suggest that the Applicant's considerations cannot ignore the collective feasibility with the immediately adjacent High Grove proposal occupying an additional 4,000 acres. They are being proposed simultaneously, for a total sequestration of 6,8000 acres in a rural Swaffham environment and neighborhood already multiply constrained**.**

Encl: Figure 1. Map of current and proposed ground solar installations in Norfolk, 2026. From: Who Owns Norfolk website; **www.whoownsnorfolk.org**
Figure 2. West Norfolk map, from "*Who owns Norfolk*" website: www.whoowns norfolk.org

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Resident of Swaffham until June 2025


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Binham
Little Walsingham
Heacham
Sandringham
Fakenham
North Wootton
Great Massingham
Pott Row
King's Lynn
North Elmham
Beetley
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