Ministry of Defence

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Your reference:
EN0110013
Our reference:
DIO 10067597

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

15th October 2026

Dear Sir/Madam,

The Droves Solar Farm

Application for a Development Consent Order under Section 37(2) of the Planning Act 2008

I write to provide the response of the Ministry of Defence (MOD) to the written questions raised by the Examining Authority documented ExQ3 on 29 September 2026, in relation to the above application.

The Examining Authority's written question Q2.0.2 states:

Mitigation for PAR

Table 3-1, Design Principles, Parameters and Commitments [REP4-020] refers to the PAR mitigation structures that would be implemented prior to the construction of any part of Work No. 1(a) within the areas shown as Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 on RAF [Royal Air Force] Marham Mitigation Areas Plan [REP4-039]. (i) Could the applicant and the Defence Infrastructure Organisation (DIO) clarify if a process has been agreed to test and certify the effectiveness of the proposed PAR mitigation structures, prior to construction of any part of Work No. 1(a)? If so, how would this process be secured in the draft Development Consent Order (dDCO)? (ii) Issue Specific Hearing 3, Item 3-1, post hearing note, Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [REP4-035] refers to if mitigation acceptable to the Ministry of Defence (MoD), could not be achieved within those parameters [referred to above], the [PV] panels in the affected areas would not be built. Could the applicant and DIO clarify how this restriction would be secured in the dDCO?

Q2.0.02 – MOD response

- A specific process to test and certify the effectiveness of any Precision Approach Radar (PAR) mitigation shielding structures has not been defined. The Ministry of Defence (MOD) is of the view that it is not necessary for such a process to be defined for the purpose of granting a Development Consent Order (DCO). The MOD will determine whether any proposed shielding structures will be sufficient to prevent the proposed installation of solar

photovoltaic (PV) panels in any of the 3 mitigation areas from being in radar line of sight to the PAR by completing technical assessments that are used to determine defence radio site protection safeguarding requirements. The exact methodologies that will be used may vary relative to what form the shielding structures may take and how they are installed but, will likely include some form of radar line of sight modelling.

- The applicant and the MOD have agreed the wording of a dedicated Requirement for inclusion in the draft DCO to secure the submission of relevant detailed plans of shielding structures for approval by the local planning authority in consultation with the MOD. This will apply to any part of Work No. 1(a) that will be located within the areas defined as Mitigation Area 1, Mitigation Area 2 or Mitigation Area 3. In the event that proposed shielding mitigation acceptable to the MOD cannot be achieved or, the undertaker elects not to build PV solar panels in some or all of the mitigation areas specified then, the Requirement accounts for this in that the undertaker can submit plans of their finalised layout design for PV panels to confirm that they will not be located in all or some of the prescribed mitigation areas and therefore confirming where shielding structures (if any) will be required

The Examining Authority's written question Q2.0.3 states:

Effects on aviation from the proposed development

Could the applicant and the DIO ensure that the Statement of Common Ground at D5 presents their latest positions on all outstanding matters of concern, resulting from the proposed development alone and for cumulative effects, to include: (i) Proposed wording for new requirements for Precision Approach Radar (PAR) mitigation and Glint and Glare Management (including reference to a Glint and Glare management plan) (ii) Whether agreement has been reached in the wording of the outline Construction Environmental Management Plan (oCEMP) regarding:

a) the methodology for the possible use of cranes, high reaching plant equipment or temporal structure during the construction phase; b) birdstrike safeguarding measures before construction; and c) aerodrome height safeguarding, once the transmission line details are available. (iii) Whether agreement has been reached in the wording of the outline Operational Environmental Management Plan (oOEMP) regarding birdstrike hazard to ensure that the proposed development does not increase the risk of impact.

Q2.0.03 – MOD response

- The MOD and the applicant have updated and completed the Statement of Common Ground on 15th October 2026. This documents the latest position of the MOD on matters that had been outstanding confirming that these have all been agreed.

- The wording of Requirements agreed between both the applicant and the MOD to secure mitigation for the PAR; the submission of a Glint and Glare Management Plan; an Aviation Safety Management Plan to manage the deployment of cranes and high reaching plant equipment during the construction and decommissioning phases of the development; an Aviation and Charting Requirement to secure the submission of accurate details of the location and dimensions of new overhead line transmission infrastructure as well as changes to existing transmission infrastructure to enable aviation charts to be updated and, a Requirement to secure the submission of detailed plans to approve the design of waterbodies and wetland features to prevent an increase in birdstrike hazard.

- The MOD understands that the applicant is updating their draft DCO to include these Requirements. The MOD has also submitted an update to its statutory safeguarding position on 15th October 2026 which documents the wording of each of these agreed Requirements.

I trust this adequately explains the safeguarding position of the MOD on this matter, however, should you have any questions please do not hesitate to contact me.

Yours faithfully

[redacted]

DIO Assistant Safeguarding Manager

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15th October 2026

Dear Sir/Madam,

The Droves Solar Farm

Application for a Development Consent Order under Section 37(2) of the Planning Act 2008

I write to provide an update on the statutory safeguarding position of the Ministry of Defence (MOD) with regard to the above application.

This application is to build, operate and decommission a new solar farm capable of generating over 50 Megawatts (MW) Alternating Current (AC) of electricity, consisting of arrays of ground mounted photovoltaic (PV) panels with associated inverters, battery storage facilities, electrical substations, cable and grid connections and other associated infrastructure as well as environmental mitigation and enhancement.

The proposed development will be located south of South Acre, West Acre and Castle Acre, West Norfolk.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. This objective is supported by the provisions of Policy P1, P4 and P6 of the National Planning Policy Framework (August 2026) and the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002.

The development area identified occupies statutory height, technical and birdstrike safeguarding zones that surround RAF Marham.

In my written representation dated 27th February 2026, I set out that the MOD maintained a statutory objection to the development on the basis that it has been determined that the proposed development

would cause unacceptable impacts to the effective operation of the Precision Approach Radar (PAR) at RAF Marham. In addition, it was identified that: the development may cause glint and glare emissions that might impact upon aviation safety; that cranes or other types of high reaching plant equipment that may be used during the construction and decommissioning phases of the development could affect operations at RAF Marham; that details of new overhead electrical transmission line infrastructure will need to be submitted to the MOD to maintain aviation safety and, that the waterbodies or wetland features that will be created as part of the development, may provide an attractant to large, and/or flocking birds potentially hazardous to air traffic operating from RAF Marham.

Therefore, I set out that should the applicant be able overcome the technical safeguarding objection that had been raised, that to address the other safeguarding issues identified above it would be necessary for Requirements to be included in any Development Consent Order that may be granted to secure the submission of: a Construction Management Plan; a Glint and Glare Management Plan and, to make certain that details of the design of waterbodies and wetland features to be created are submitted for approval to ensure they do not increase birdstrike hazard. Suggested wording for these Requirements was appended to my letter of 27th February 2026.

The MOD has had constructive dialogue with the applicant regarding all of the safeguarding issues outlined above and have agreed means of addressing these.

To address the impacts that the development will cause to the effective operation of the PAR at RAF Marham, the MOD has been able to define 3 specific areas of the application site within which any solar PV panels installed would need to be prevented from being in radar line of sight of the PAR through the installation of appropriate physical shielding structures. These 3 areas have been designated Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 respectively. The precise location and extent of these mitigation areas are depicted in the RAF Marham Mitigation Areas Plan (drawing number DIO10067597-20260903-V5.) which in enclosed within Appendix A. The MOD and the applicant have agreed the wording of a Requirement to secure the implementation of this mitigation. This is attached at Appendix A.

I can confirm that the MOD and the applicant have also been able to agree the wording of 4 further Requirements to secure an address of the other safeguarding issues that have been identified.

To address any potential glint and glare emissions from the solar arrays that may impact upon operations at RAF Marham, a Requirement for the submission of a Glint and Glare Management Plan has been established which is set out at Appendix B.

To manage the deployment of cranes or high reaching plant equipment, during the construction and decommissioning phases of the development, a Requirement to secure the submission of an Aviation Safety Management Plan has been prepared. This is set out at Appendix C.

To secure the submission of accurate details of the location and dimensions of new overhead line transmission infrastructure as well as changes to existing transmission infrastructure to enable aviation charts to be updated, an Aviation Charting and Safety Requirement has been produced. This is set out in Appendix C.

To secure the submission of detailed plans to approve the design of waterbodies and wetland features to prevent an increase in birdstrike hazard a Requirement has been established, which is set out at Appendix D.

Conclusion

I can therefore confirm that, subject to the inclusion of all of the Requirements set out in Appendices A to D attached to this letter, in any Development Consent Order that may be granted for this development, that the MOD is content to withdraw its statutory safeguarding objection to this application.

I trust this adequately explains the safeguarding position of the MOD on this matter, however, should you have any questions please do not hesitate to contact me.

Yours faithfully

[redacted]

DIO Assistant Safeguarding Manager

Appendix A

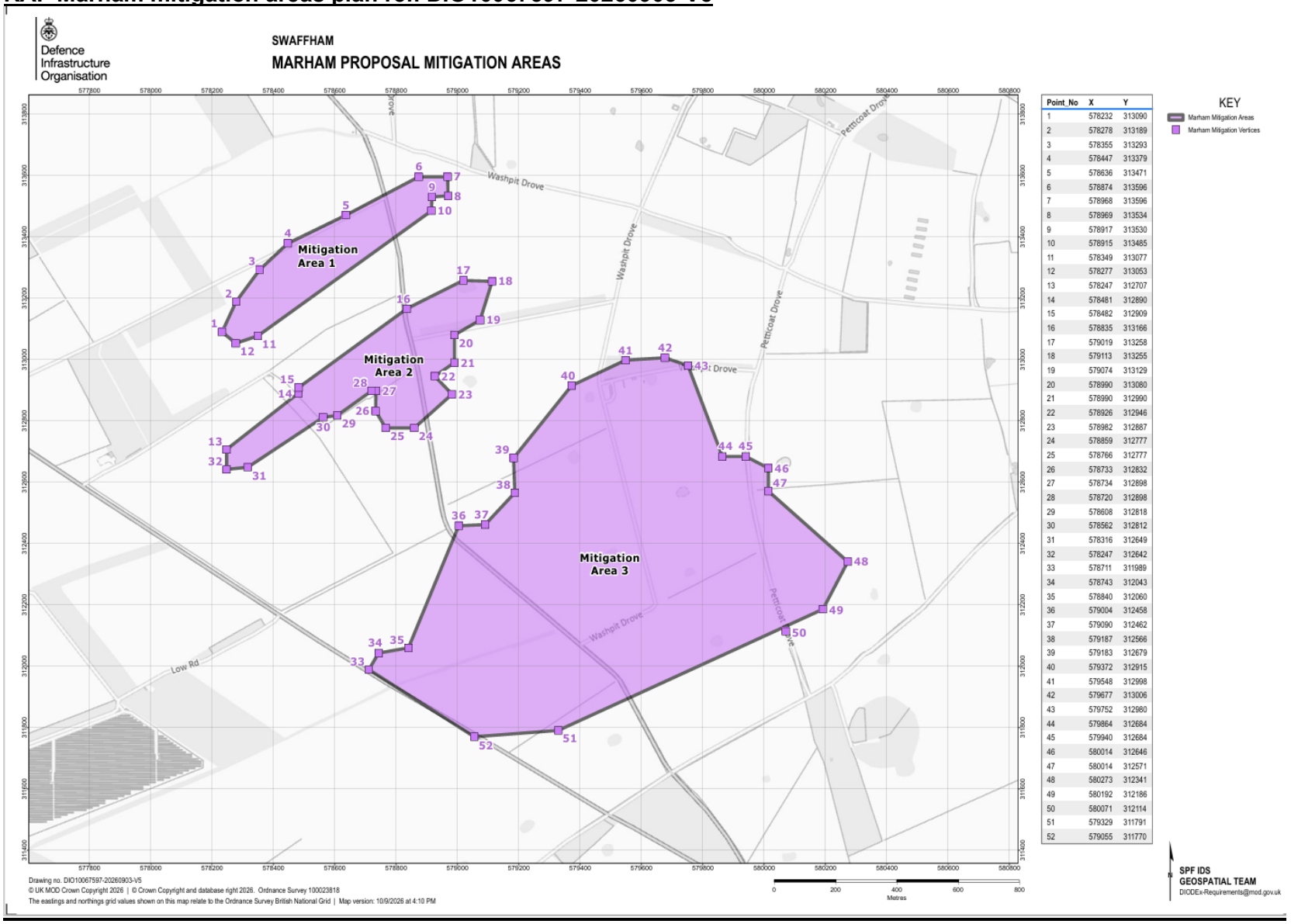
PAR Mitigation DCO Requirement

Mitigation at RAF Marham

21.—(1) Unless otherwise agreed in writing with the Ministry of Defence and approved by the relevant planning authority:

(a) No part of Work No. 1(a) within the areas shown as Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 on the RAF Marham mitigation areas plan (drawing number DIO10067597-20260903-V5.) may commence until a detailed plan has been submitted to and approved by the relevant planning authority in consultation with the Ministry of Defence;
(b) the detailed plan must include details of the dimensions, layout and material composition of the shielding structures to be installed to ensure that any part of Work No. 1(a) within the areas shown as Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 on the RAF Marham mitigation areas plan (drawing number DIO10067597-20260903-V5.) will not be in radar line of sight of the precision approach radar at RAF Marham;
(c) the shielding structures approved under the detailed plan must be implemented by the undertaker prior to the construction of any part of Work No. 1(a) within the areas shown as Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 on the RAF Marham mitigation areas plan (drawing number DIO10067597-20260903-V5.); and
(d) the shielding structures approved under the detailed plan must be maintained in accordance with the approved detailed plan until the completion of decommissioning of all parts of Work No. 1(a) within the areas shown as Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 on the RAF Marham mitigation areas plan (drawing number DIO10067597-20260903-V5.).

RAF Marham mitigation areas plan ref. DIO10067597-20260903-V5



Point_No	X	Y
1	578232	313090
2	578278	313189
3	578355	313293
4	578447	313379
5	578636	313471
6	578874	313596
7	578968	313596
8	578969	313534
9	578917	313530
10	578915	313485
11	578349	313077
12	578277	313053
13	578247	312707
14	578481	312890
15	578482	312909
16	578835	313166
17	579019	313258
18	579113	313255
19	579074	313129
20	578990	313080
21	578990	312990
22	578926	312946
23	578982	312887
24	578859	312777
25	578766	312777
26	578733	312832
27	578734	312898
28	578720	312898
29	578608	312818
30	578562	312812
31	578316	312649
32	578247	312642
33	578711	311989
34	578743	312043
35	578840	312060
36	579004	312458
37	579090	312462
38	579187	312566
39	579183	312679
40	579372	312915
41	579548	312998
42	579677	313006
43	579752	312980
44	579864	312684
45	579940	312684
46	580014	312646
47	580014	312571
48	580273	312341
49	580192	312186
50	580071	312114
51	579329	311791
52	579055	311770

Appendix B

Glint and Glare DCO Requirement

Glint and glare management plan

22.—(1) Unless otherwise agreed in writing with the Ministry of Defence and approved by the relevant planning authority, no part of Work No. 1(a) may commence until a glint and glare management plan has been submitted to and approved by the relevant planning authority in consultation with the Ministry of Defence.

(2) The glint and glare management plan must include details of:

a) specifications (including surface types and anti-reflective coating) of the solar modules and mounting structures comprising Work No. 1(a), illustrated with sectional plans as appropriate to show the angle of elevation and angle of azimuth of the solar modules comprising Work No. 1(a);
b) a schedule of monitoring and maintenance of the alignment of the solar modules within Work No. 1(a);
c) a protocol through which glint and glare complaints can be submitted by the Ministry of Defence, investigated by the undertaker, and any issues resolved via procedures that ensure the required mitigation is implemented following consultation and approval by the relevant planning authority in consultation with the Ministry of Defence;
d) a procedure through which such complaints and associated resolutions will be recorded and made available to the Ministry of Defence on request;
e) a protocol for the undertaker and the Ministry of Defence to urgently address incidents of any glint or glare impact that materially restrict aviation operations at RAF Marham, including the provision of air traffic control services from the air traffic control tower. The protocol must include the application of agreed interim mitigation measures that will stop the source of glint or glare impact until permanent mitigation measures are implemented; and
f) timescales for:
    a. completing investigations;
    b. implementing remedial works; and
    c. the provision of interim and/or permanent mitigation measures.

(3) The provisions set out in the glint and glare management plan and any modifications/mitigation, as agreed in writing with the relevant planning authority, must be maintained until the completion of decommissioning of Work No. 1(a).

Appendix C

Aerodrome Safeguarding and Aviation Safety DCO Requirements

Aviation safety management plan

23.—(1) Unless otherwise agreed in writing with the Ministry of Defence and approved by the relevant planning authority, no part of the authorised development may commence until an aviation safety management plan has been submitted to and approved by the relevant planning authority in consultation with the Ministry of Defence.

(2) The aviation safety management plan must include details of:

a) the locations and maximum dimensions of any cranes, high reaching plant equipment and temporal tower type structures that will be deployed within Ministry of Defence statutory aerodrome safeguarding zones surrounding RAF Marham, to construct and later decommission the solar modules comprising Work No. 1(a); and
b) communication protocols to be established between the undertaker and the Ministry of Defence to ensure that the undertaker provides notification of its programme of works to construct and later decommission the authorised development.

(3) The undertaker must notify the Ministry of Defence in writing, at least 14 days prior to the commencement of the authorised development, of its intention to deploy cranes, high reaching plant equipment or temporal tower type structures that will be located within Ministry of Defence statutory aerodrome safeguarding zones surrounding RAF Marham. The undertaker must also notify the Ministry of Defence of any changes to the information supplied in accordance with this requirement.

Aviation charting and safety

25.—(1) Unless otherwise agreed in writing with the Ministry of Defence and approved by the relevant planning authority, the undertaker must notify the Ministry of Defence of the precise latitude and longitude and maximum height of each new or modified pylon above ordnance datum (including temporal pylons), as built, within 5 days of the completion of construction of each such pylon.

(2) The undertaker must notify the Ministry of Defence of the removal of any existing pylons within 5 days of the completion of removal works for each such pylon.

(3) The Ministry of Defence must be notified of any changes to the information supplied in accordance with this requirement.

Appendix D

Aviation safety – waterbodies and wetland design approval

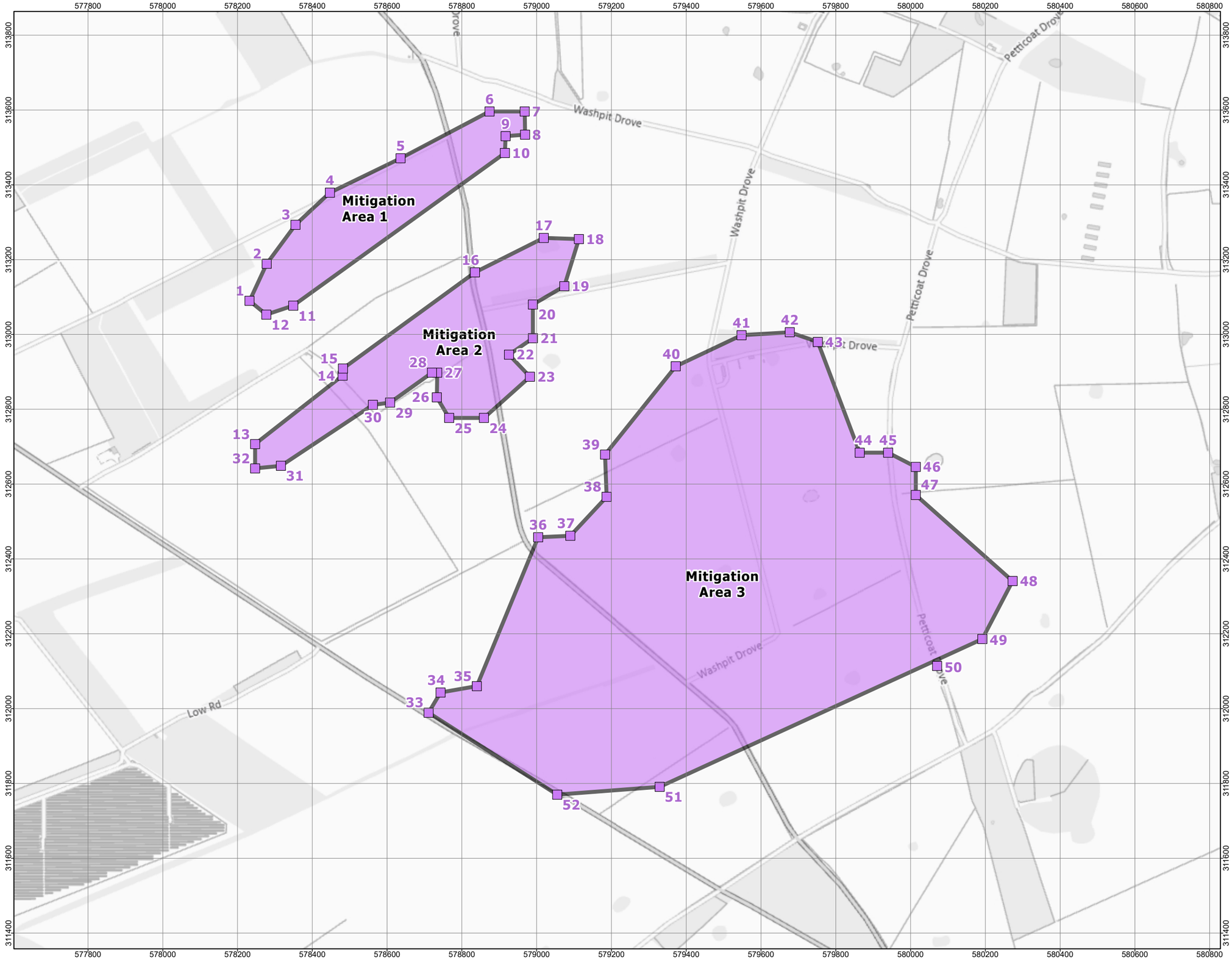
24.—(1) Unless otherwise agreed in writing with the Ministry of Defence and approved by the relevant planning authority, no part of the authorised development may commence until details of the siting, design, any associated planting and management of any ponds, swales, surface water drainage systems, storm water attenuation systems including storage basins and channels or other wetland features that are to be created for that part have been submitted to and approved by the relevant planning authority in consultation with the Ministry of Defence.

(2) The authorised development must be constructed and maintained strictly in accordance with those approved details and the undertaker must not vary or depart from those details without the express written consent of the relevant planning authority in consultation with the Ministry of Defence.

Defence Infrastructure Organisation

SWAFFHAM

MARHAM PROPOSAL MITIGATION AREAS



Point_No	X	Y
1	578232	313090
2	578278	313189
3	578355	313293
4	578447	313379
5	578636	313471
6	578874	313596
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49	580192	312186
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51	579329	311791
52	579055	311770

KEY

- Marham Mitigation Areas
- Marham Mitigation Vertices

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