Submission ID: SD238C2C3

The Droves Solar Site Deadline 6
Application by the Droves Solar Farm Limited (EN0110013) Deadline 6
Interested Party. [redacted]. Castle Acre Parish Council, also representing some residents of South Acre.
We as communities continue to have huge concerns in respect of this DCO application for a Solar PV Site, associated Substations and Bess Storage. We have previously submitted our objections to the approval of this development and continue to do so believing many of our concerns have not been resolved by the applicant and never will be. In light of recent submissions, we would like to add to all previous representations with further comments below and a final conclusion.
To us it is clearly the wrong site for such a development. There are now many uncertainties with this application. In addition, how can there be any justification for building poorly performing solar facilities on such large tracts of productive agricultural land which itself is a critical resource for future UK food security. (Latest government efficiency data for UK solar installations reveals a power output of only 9.9% of its capacity). Simply it is the wrong, poor performing technology, (over-scaled to compensate) proposed for huge areas of BMV Agricultural land. We continue to question the validity of the applicant's site selection process in the belief that site comparisons are not sufficiently detailed.
Consultation with local communities has at times been less than acceptable. We are not aware there has ever been an affected 'Communities Impact Assessment' produced, why not. For example, noise during construction, sound travels in this environment, we can hear Shot Gun noise up to approx. 4 miles away, if panel supports are piled the constant noise could be unbearable! Until challenged the Applicant had initially excluded Castle Acre as a location for an 'In-person consultation event' (Consultation Information Booklet page 47), the Parish Council had to arrange a 'pop-up meeting' on the applicant's behalf. Some emails to info@drovessolarfarm have never been responded to. Communications have only recently improved.
Duration of the planned project has been reduced from 60 to 40 years, a 33% reduction. How will this effect viability?
In a recent submission, the applicant has disclosed a material grid-connection problem. It has been told it is Gate 1 but has not yet received a formal Gate 1 offer, the submission also does not establish that it holds a Gate 2 connection. The Applicant is relying on the scheme's contribution to renewable energy generation for its justification and the achievement of national decarbonisation objectives, this must be increasingly questionable.
The more uncertain the connection arrangements, the more important it becomes to establish whether the development can realistically deliver those benefits on the basis assumed in the Applicant's case. The issue is not simply whether the project might eventually connect to the grid. It is whether the relevant connection arrangements, technical requirements and programme are sufficiently developed to support the claimed benefits.
According to the National Energy System Operator (NESO), Gate 1 does not reserve grid capacity, guarantee a connection or provide a confirmed connection date. A project must subsequently qualify for Gate 2 to secure a place in the new connections pipeline.
The practical implications are:
- No confirmed connection date: The applicant cannot rely on Gate 1 alone to establish when the solar farm will connect.
- No guaranteed future connection: It would need to qualify for Gate 2 through a future application process.
- Potential delays: Its proposed construction and operation timetable may become harder to achieve.
- Uncertainty over deliverability: There is a legitimate question about whether the scheme can be delivered as currently proposed.

We also note in his Budget speech of 28th October 2026, the Chancellor stated that the Government would "only buy and build new projects when they lower bills and when they can connect to the grid". The accompanying Budget document further specifies that new generation should be procured only where it lowers bills overall, benefits the electricity system and can be accommodated by the grid.
This statement reinforces the importance of demonstrating that proposed energy infrastructure is deliverable in practice, rather than relying on an assumed future connection.
So, we now have to ask: Can the Examining Authority consider whether the claimed public benefits have been demonstrated with sufficient confidence.
- Whether the applicant can demonstrate a realistic route to obtaining Gate 2.
- Whether the relevant grid infrastructure will be available when required.
- Whether the proposed development timetable remains credible.
- Whether the final planning decision properly accounts for the uncertainty over delivery.

The Applicant confirms that NESO has reprioritised The Droves Solar Farm as a Gate 1 project and that no formal Gate 1 offer had been received at the date of its submission. Consequently, the Applicant has not demonstrated through this submission that the scheme holds a confirmed Gate 2 connection offer.
Whilst the national need for renewable electricity is acknowledged, that general need does not establish the deliverability of this particular development. The Applicant's assertion that the need for the scheme is unaffected by its position in the connections queue does not resolve the separate question of whether a viable connection will be available, or when.
NESO's published guidance confirms that Gate 1 projects do not progress into delivery under the reformed connections pipeline unless they subsequently secure the necessary Gate 2 status.
Landscape
Castle Acre, South Acre. The undoubted beauty of their surrounding landscape and the richness of historic and natural environment sets them apart from many other Norfolk villages, they are known as jewels of Norfolk. Castle Acre's position on the northern slope of the Nar Valley means that it has far-reaching views over the river and surrounding farmland.
What is at risk? It is our rural settlement pattern dating back to at least the Saxons. Our narrow rural road network is based on Roman and medieval trackways and holloways, bounded by banks and ditches; there are still some medieval field boundaries and livestock droveways and the Agricultural Revolution is evidenced in our rectangular fields and marl pits.
The proposed solar development lies within the setting of multiple designated heritage assets, including Castle Acre Priory; Castle Acre Castle and the Bailey Gate. All three are scheduled ancient monuments.
St James the Great Church in Castle Acre and St George's Church in South Acre are both Grade 1 listed buildings.

These assets are protected under the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires authorities to conserve their setting.
Two Roman Roads – the Peddar's Way and the Fen Causeway will be impacted by the solar farm as will the medieval route for pilgrims from King's Lynn to Walsingham, along what we now call the Nar Valley Way.
Castle Acre Castle, Church and Priory are focal points in our countryside views. Equally, their setting is a major part of their significance. The Droves Solar Farm will deprive them of their context within the wider historic environment. Forty years is a substantial period for a rural landscape, for residents living nearby and for people experiencing the historic setting of Castle Acre.
Even if the panels and associated infrastructure can eventually be removed, that does not mean the effects are insignificant during the operational period.
In answering a question about compliance with King's Lynn and West Norfolk's local planning policies, the Applicant acknowledges that significant adverse effects remain in relation to: Landscape and visual receptors.
Cumulative effects on best and most versatile agricultural land.
Cumulative landscape effects.
It then argues that the scheme's benefits clearly outweigh the residual harms.
EN0110013-000860-8.29 Applicant's Response to ExQ3.pdf
That admission matters.
The dispute is not simply whether adverse effects exist. The Applicant accepts that they do.
The question is whether those effects are acceptable in this location and whether the claimed benefits justify them.
The development is proposed to operate for up to 40 years a 33% reduction and material change from the proposed 60 years. Reversibility at the end of that period does not establish that the effects experienced throughout the operational period are short-term or acceptable.
The applicant has not provided a substantive explanation of how the acknowledged cumulative effects reconcile with the landscape-protection objectives of the Castle Acre Neighbourhood Plan.
The Parish Council requests a transparent planning balance that gives appropriate weight to the duration and severity of these effects, particularly in the landscape setting of Castle Acre, South Acre and their historic assets.
Agricultural land and cumulative effects
The Applicant acknowledges significant adverse cumulative effects on best and most versatile agricultural land but relies on the overall benefits of the scheme to justify those effects.
Referring again to a previous representation: National policy states that the use of BMV land for solar development should be avoided. The applicants survey work has found large areas of this site are classified as BMV land, some 54%. Irrigation is also available to much of this site allowing high value specialist crops such as potatoes, carrots and onions to be successfully grown in rotation across the whole area. Surely this is further evidence that the site selection is inappropriate.
It has been suggested by the Applicant that all land will be returned to agriculture in 'better condition' at the end of the development period, this has not been evidenced, where is the data and analysis to support this assumption? It is impossible for damaged sub-soils to be returned to their former condition as suggested by the applicant, one only has to assess structure damage still evident after the laying of local pipelines decades after the event.
RAF Marham radar mitigation.
Please refer to CAPC submission at Deadline 5.
What is the area, in acres and hectares, of the RAF Marham Mitigation proposed on Document 8.26 RAF Marham MAP? We think it could constitute 15-17.5% of the development area.
The Applicant proposes non-reflective fencing and/or earth bunds, potentially up to 4.5 metres high, to mitigate effects on RAF Marham's Precision Approach Radar. However, the final design is deferred to a later approval process. Surely there should be a schedule showing the maximum permissible dimensions, location, materials and configuration of each mitigation structure, together with an assessment of the worst-case environmental effects.
The Parish Council requests, confirmation that the Development Consent Order will secure a technically defined testing and verification procedure, clear acceptance criteria, remedial measures in the event of failure and a prohibition on installing the affected solar panels until the required performance has been demonstrated.
Approval of a mitigation design should not be treated as equivalent to proof of its effectiveness.
We also request a clear explanation of how the worst-case permitted mitigation design has been assessed across all relevant environmental topics.
Any conclusion that further assessment is unnecessary should be supported by evidence specific to the proposed structures and their locations.
The DCO should not allow the final design to introduce materially greater effects than those considered during the examination.
Conclusion
Castle Acre Parish Council recognises the importance of renewable energy generation but considers that the public benefits relied upon by the Applicant for this potential development site do not outweigh the harm that will be inflicted on the local Historic Landscape, the setting of Heritage assets, BMV Agricultural Land and local communities along with their general well-being.
Building huge, poorly performing Solar Plants on productive BMV land surely cannot be justified, especially as developers have to over-scale to compensate for their poor 'inconsistent' performance. There are alternative locations for solar which have been mentioned many times, such as brown field sites, industrial and domestic roof tops. Solar generation does not provide energy security; it produces its highest yields when demand is at its lowest and might indeed have to switch off during summer months due to these inconsistencies. Continually placing ground mounted schemes on BMV land could be putting future UK food security at risk.
We continue to suggest Bird Surveys carried out across the site specifically in relation to the Red Listed protected species, 'Stone Curlew' appear to be inadequate. Once again their presence has been noted on site this autumn as well as being evidenced last year, to repeat, expert opinion suggests there should be three to five years of survey work carried out, can we have confirmation please that this will be done.
We have to ask the legitimate question about whether the scheme can actually be delivered as currently proposed due to:
1. The applicant's disclosed and accepted material grid-connection problems.

2. The outstanding RAF Marham radar mitigation solutions and potential area reduction. The Applicant has recently introduced substantial potential landscape structures, deferring their detailed design and is relying on future approval to secure their acceptability.

Castle Acre Parish Council respectfully suggest the Examining Authority should not treat matters as resolved merely because a future approval process has been proposed. It should be satisfied that the development's environmental acceptability, technical deliverability and necessary mitigation are adequately demonstrated and secured before making a recommendation.

We continue to object to the proposed development, believing public benefit cannot be sufficiently quantified for reasons submitted in all our representations and submissions over the period of this examination and certainly does not outweigh the harm it will inflict.

[redacted].

Chair, Castle Acre Parish Council.