Submission ID: S5B21E203

I am writing at this final stage of the examination to voice my profound concerns regarding the applicant's failure to adequately address a foundational element of the proposed project, specifically the apparent absence of confirmed gate connections to the National Grid transmission system, the unjustified use of Best and Most Versatile agricultural assets, and the safeguarding of local wildlife across the proposed site. Furthermore, I wish to strongly object to the severe, unmitigated cumulative visual impacts of this scheme and the late-stage engineering solutions introduced for the RAF Marham radar safeguarding zones.

Despite iterative deadlines, the applicant's environmental and technical assessments remain fundamentally deficient under national planning policy frameworks. I urge the Examining Authority to scrutinise the following critical failures before closing the examination:

1. Lack of Viable Grid Transmission Capacity and Gate Connections

The applicant has failed to provide absolute commercial or technical certainty regarding its gate connections to the National Grid transmission system.

• Speculative Development: Proceeding with a Development Consent Order of this immense 500-megawatt scale without a legally secured, non-speculative grid connection agreement turns this entire process into a speculative exercise.

• Unjustified Harm: The applicant is asking the Examining Authority to recommend the industrialisation of thousands of countryside acres, yet they cannot guarantee that the power generated can actually be uploaded to the grid when built. It is entirely unacceptable to inflict irreversible damage on local communities and ecosystems for a project that lacks an assured pathway to operational delivery.

2. Inadequate Ecological Assessments and Severely Diminished Mitigation Zones for Stone Curlews

The applicant's ecological strategies are critically flawed and fail to protect the highly sensitive, Schedule 1 protected Stone Curlew.

• Severely Diminished Mitigation Zones: The proposed ecological mitigation zones and setbacks are completely inadequate and tokenistic. The developer has progressively squeezed these designated areas to maximise solar array density. The remaining fragments of land set aside fail to meet the required spatial buffers necessary to protect breeding pairs from the industrial footprint of the project.

• Flawed Baseline Data: The developer's initial surveys claim no records of qualifying species. However, local experts and residents have confirmed multiple sightings of breeding pairs on the site across recent seasons.

• Compounded Mitigation Impacts: The proposed 4.5-metre earth bunds, extensive fencing, and construction noise will directly encroach upon and destroy the open, ground-nesting habitats that these rare birds rely upon near the Breckland Special Protection Area boundary. Squeezing these birds into diminished, fragmented plots adjacent to heavy industrial infrastructure is a recipe for local extinction.

3. Severe Cumulative Visual and Landscape Industrialisation

The Droves Solar Farm cannot be viewed in isolation. When combined with the adjacent 4,000-acre High Grove Solar scheme and existing infrastructure, this project creates an unacceptable, landscape-scale cumulative visual impact.

• Loss of the Norfolk Open Character: This region is defined by its historic, expansive, and windswept agricultural vistas. If approved, thousands of acres of continuous countryside will be replaced by an industrial landscape of security fencing, closed-circuit television poles, battery storage containers, and millions of reflective panels.

• Visual Enclosure: The introduction of massive, late-stage 4.5-metre earth bunds and acoustic/radar fences to mitigate the RAF Marham radar conflicts completely shatters the applicant's initial visual impact assessments. Instead of open long-distance views, local residents, walkers, and users of the historic public rights of way will face oppressive, engineered artificial barriers that utterly transform the rural character.

4. Destructive and Unassessed Earth Bunds for RAF Marham Radar Safeguarding

The developer's approach to the Ministry of Defence's radar safeguarding zone creates severe environmental and agricultural conflicts. To mitigate multi-path interference with RAF Marham's Precision Approach Radar, the applicant has proposed erecting these massive 4.5-metre fences and engineered earth bunds.

• Soil Degradation: Constructing earthworks of this industrial scale requires invasive subsoil handling and topsoil stripping, compounding the net loss of Best and Most Versatile land quality.

• Hydrological Risk: Altering the topography with massive embankments risks causing major disruptions to local field drainage, shifting flooding vulnerabilities onto neighbouring active farmland.

5. Failure to Demonstrate Meaningful Site Alternatives

National Policy Statements are explicit: developers must seek to utilise poorer quality land in preference to Best and Most Versatile land. With over 55% of the proposed site classified as Best and Most Versatile land (Grades 1, 2, and 3a), the applicant has failed to provide a transparent, sequential test demonstrating why a project of this immense 500-megawatt scale cannot be accommodated on lower-grade or brownfield alternatives within the region.

6. Absence of Granular, Field-by-Field Soil Safeguards

The developer has relied on generalised Agricultural Land Classification metrics rather than providing rigorous, field-by-field verification across the expansive plateau. Without granular baseline surveying, the risk of irreversible soil compaction and long-term loss of productive output during the construction of sub-stations, Battery Energy Storage Systems, and heavy solar arrays is severely understated.

Conclusion and Requested Action

The national need for renewable energy must not be delivered at the cost of our most vital agricultural safety nets, protected species, and historic landscape integrity without absolute justification. Because the applicant has failed to secure valid grid gate connections, failed to justify the agricultural footprint, failed to provide biologically viable mitigation zones for Stone Curlews, and introduced invasive 4.5-metre earth bunds that ruin

the visual fabric of the area, I respectfully request that the Examining Authority recommend the refusal of the Development Consent Order.

Application Reference: EN0110013

Project: The Droves Solar Farm

Submission Stage: Final Opportunity / Late-Stage Examination Representation

Addressed to: [redacted], Examining Authority

Dear [redacted],

RE: Critical Deficiencies in Grid Connectivity, Land Quality, Stone Curlew Protection, and Cumulative Visual Impacts

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- **Flawed Baseline Data:** The developer’s initial surveys claim no records of qualifying species. However, local experts and residents have confirmed multiple sightings of breeding pairs on the site across recent seasons.
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Yours sincerely,

James Foster

Interested Party Reference Number [redacted]