Written Representations

from

Norfolk Wildlife Trust

Submitted for Deadline 1
2 June 2026

Planning Act 2008 (as amended)

In the matter of:
The Droves Solar Farm

Planning Inspectorate Ref: EN0110013
Norfolk Wildlife Trust Registration Identification ref: [redacted]

Introduction

1. Norfolk Wildlife Trust (Registered charity no. 208734) has more than 40,000 members and is dedicated to the conservation of wildlife and restoration of the natural environment in Norfolk. We recognise the need for renewable electricity to facilitate the transition to low-carbon electricity generation and supply in the UK. Our interest in the Droves Solar Farm project that is the subject of this DCO application ('the Project') relates to its impacts on wildlife and ecology in Norfolk, both in terms of existing wildlife and ecological features and the potential ecological enhancements to make a meaningful contribution to nature recovery.

2. Norfolk Wildlife Trust has engaged with the Island Green Power Project Team, and their ecological consultants, regarding the Project as part of the pre-application process. Our comments below detail areas of interest and concern and will be the focus of our representations and engagement as part of the DCO application process. We note though that new information may come to light during the Examination process and reserve the right to comment on additional matters to those detailed below should this be necessary to support our goal of securing the best possible outcomes for wildlife and biodiversity.

3. Norfolk Wildlife Trust supports solar energy development in principle, recognising its importance in meeting the UK Government's commitments on energy security and net zero carbon emissions by 2050. However, our support for The Droves Solar Farm is qualified. The Project must be designed, constructed, operated and decommissioned in a way that:
    - Avoids harm to designated sites, priority habitats and protected species.
    - Delivers ambitious biodiversity net gain, exceeding the statutory minimum.
    - Contributes meaningfully to nature recovery and ecological connectivity at a landscape scale; and
    - Provides genuine and lasting benefits to local communities.

4. At present, NWT considers that further information and design refinement are required before the Project can be considered acceptable in ecological and environmental terms. Our focus during the Examination will be on securing comprehensive mitigation and compensation for potential impacts.

General Concerns and Comments

5. We acknowledge that through field selection and design, significant effort has been made to avoid impacting protected wildlife sites in Norfolk.

6. Norfolk Wildlife Trust seek assurances that a strict adherence to the Mitigation Hierarchy will be followed, including evidence that impacts are being avoided and enhancement is being delivered. Where mitigation, compensation, and enhancement are delivered – be it for Biodiversity Net Gain, landscape, or for targeted species – we seek to ensure the best possible outcomes for biodiversity.

Masterplanning and Layout

7. The proposed siting of substations and BESS within Fields 24 and 27 is of significant concern. These areas coincide with some of the highest levels of bat activity recorded on site, as identified in the Baseline Ecology Report (see our further comments relating to bats below).

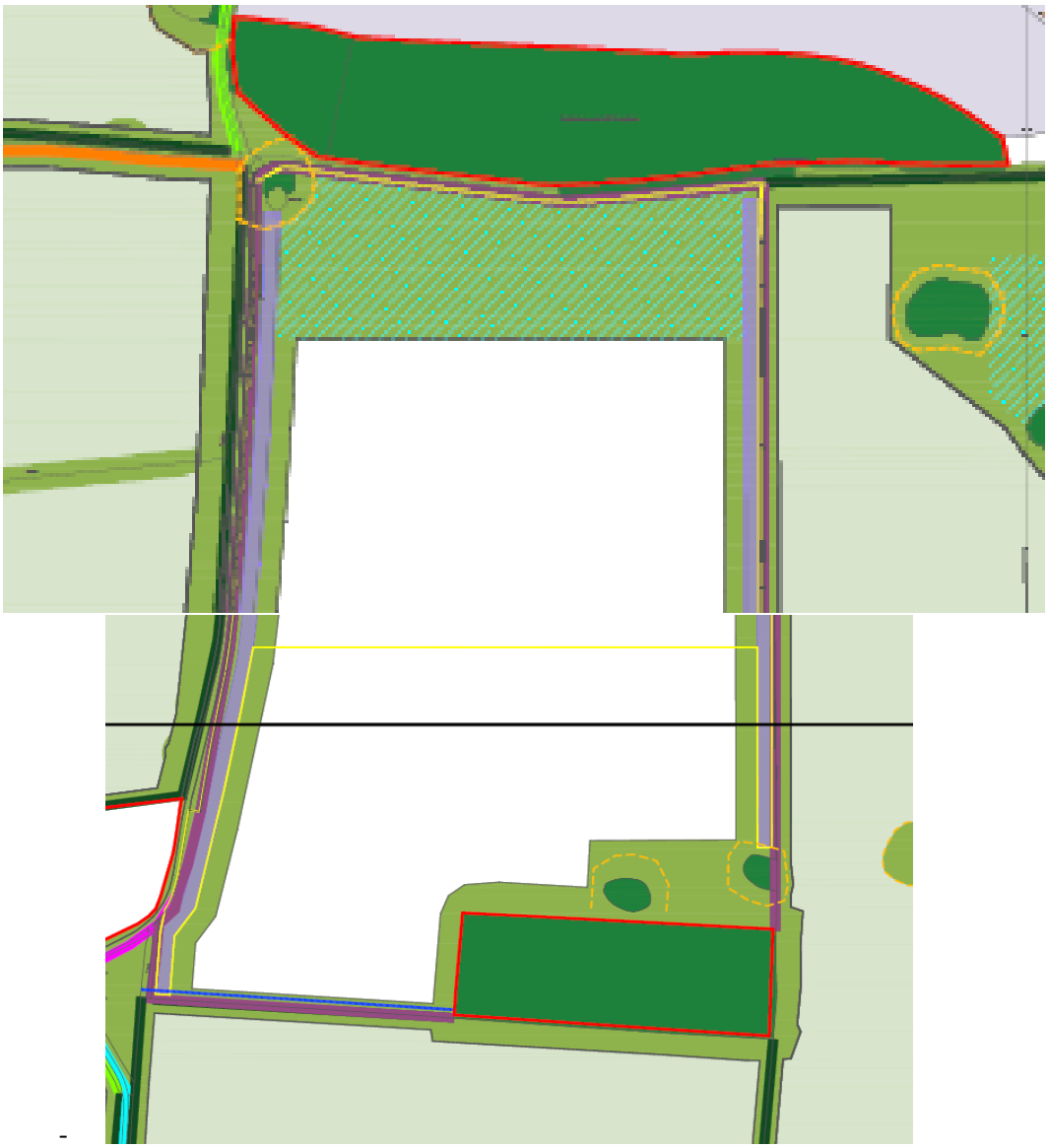
8. The requirement for new lighting in these locations, as well as increased noise, has the potential to cause adverse impacts on bats and other nocturnal wildlife. NWT strongly recommends that:
    - Alternative locations for infrastructure requiring lighting are explored; and
    - The design prioritises avoidance of impacts on nocturnal species.

Impacts on Bats

9. Paragraph 7.7.25 (Chap 7, ES) states that no new lighting is proposed within the Solar PV Site areas but that new lighting will be "*limited to locations essential to security, namely the Customer Substation, National Grid Substation, and Battery Energy Storage System (BESS)*". Currently, the BESS and substation are proposed to be located within fields 24 and 27. These are the fields with some of the highest recordings of bat activity.

10. Ideally, we request that these areas of infrastructure are located elsewhere within the red-line boundary. If this is not possible, we seek assurance that appropriately designed buffers are put in place to ensure there are no negative impacts on bat species.

11. It is not clear from the Figure shown in Appendix 1 of the Green Infrastructure Strategy Plan (Outline LEMP) where the BESS is to be situated. The yellow outline indicates "Permanent area for Green Infrastructure and National Grid Substation left after decommissioning" but there is nothing on the key relating to the BESS. We are also unclear from the key what the hatched area to the north of this area is?



-

12. Regarding the wider site, paragraph 7.8.47 (Chap 7, ES) notes that the Site includes a number of trees including those containing potential roosting features (PRF), predominantly located within the field boundary hedgerows and tree lines. It is stated that without further survey work to confirm the nature, species and status of any individual roosts, it is not possible to confirm the scale of importance of any individual roost (e.g. small roosts of common species would likely be of significance at the Site level, whereas large maternity roosts of rarer species would be of significance at larger scale). The ES goes on to note that none of the relevant trees or buildings will be affected as a result of construction activities, whilst buffers will be retained throughout construction activities such that regardless of the importance of any bats present, should individual roosts be present, following the embedded mitigation the magnitude of impact is considered to be negligible. However, we point out that Table 10 (Chap 7 ES), which outlines the embedded buffer distances, states that buffer sizes from bat roosts will be determined on a 'case by case basis'. Thus, further information is required as if surveys are not being undertaken to determine significance of any roosts, how will these buffers be set and what will they be?

The river Nar SSSI

13. The River Nar SSSI is hydrologically linked to the Site via chalk aquifer baseflow and near-surface water supplies which drain into the River Nar SSSI. It is essential that robust pollution prevention measures are in place, especially during the construction period, as there is potential for chemical spills and contaminated surface water runoff to reach the River Nar SSSI via overland flows such as ditches, which would degrade the habitats with adverse effects to the associated faunal and botanical assemblages of the River Nar SSSI.

Roadside Nature Reserves

14. River Road Roadside Nature Reserve 033086 lies within the Site boundary and RNR U22086 is adjacent to it. There is an access track proposed to run immediately adjacent to RNR U33086 within field 10. We understand that access routes remain indicative at this stage and will therefore be determined at the detailed design stage. Appropriate buffers to safeguard and avoid adverse impacts on these locally important sites alongside ongoing management and monitoring measures, such as grassland management must be secured in the DCO.

Impacts on Woodland

15. Paragraph 7.8.39 (Chap 7 ES) states that the woodland within the Site is of medium sensitivity and that there will be no direct permanent loss of woodland within the Order limits but will be limited to *temporary impacts to vegetation* within the woodland. We seek clarification as to what exactly this means?

Buffers and Habitat Protection

16. NWT recommends that buffers around watercourses, ditches and ponds are increased to a minimum of 20 metres to reduce pollution risk and enhance biodiversity. We also recommend that the buffer distance around woodlands which support bats is also widened to a minimum of 30m.

Additional land to accommodate Skylark and Curlew mitigation

17. We note that new pylons will be installed and that this pylon route will run straight through the new area proposed for skylark and curlew mitigation. Installing pylons in an area proposed for curlew mitigation could significantly undermine the success of the area by causing issues of collision for adult

birds and by providing perches for predators. Guidance is that new infrastructure such as pylons should not be placed in sensitive areas.

Hedgerows

18. We welcome the overall aim for retention of hedgerows. However, the ES should quantify the amount of hedgerows that will be lost due to widening for access; paragraph 7.8.41 of the Ecology chapter of the ES only states "any removal of hedgerows would be anticipated to be limited to minor widening".

Stone Curlew

19. The application site is within the vicinity of areas where stone curlew are confirmed to be breeding and parts of the site itself have suitable soils for this species to nest. Although the surveys submitted with the DCO application did not find stone curlew on the site, we strongly recommend extending the surveys outwards from the site for 500m (in areas where soils are suitable) as this species is highly susceptible to disturbance. In addition, we strongly recommend that surveys are undertaken during three breeding seasons to account for crop rotations.

Habitat creation/restoration/management

20. We are pleased that the outline Landscape and Ecological Monitoring Plan (LEMP) has been guided by the newly published LNRS. We welcome the statement that opportunities for green hay donor sites will be explored prior to the preparation of the detailed LEMP (paragraph 7.3.62 oLEMP) and would be happy to provide support with this.

Habitat Boxes and Wildlife Enhancement Features

21. No information is given as to the exact number of habitat boxes (birds/bats) or log piles that will be provided. Clarification on this is required.

Biodiversity Net Gain

22. We understand that The Droves Project does not fall within mandatory Biodiversity Net Gain requirements, but that there are requirements and commitments for Biodiversity Net Gain that must be delivered. We welcome the ambition to provide a 23% uplift in on-site habitat units and a 59% uplift in hedgerow units.

23. It is essential that best practice for Biodiversity Net Gain (BNG) is followed and that strong consideration for the Local Nature Recovery Strategy is included wherever post-development Biodiversity Net Gain units are delivered. The biodiversity value of such habitat can be further enhanced by looking to create habitat of a type or in a location to benefit key species.

24. Paragraph 4.5.4 (BNG report) states that under the terms of the metric, the habitat units identify a "trading error" due to the loss of habitat units associated with "arable field margins game bird mix" habitat which will be lost under the Scheme. Should it not be possible to address the required units within the Site, any further requirement will need to be delivered off-site in order to ensure that the trading requirements can be met (as acknowledged in para 4.5.5 BNG Report).

25. Under BNG's additionality rules, habitat measures delivered to mitigate or compensate for impacts to protected sites and species can only count towards, and not beyond, no-net-loss, for example the mitigation measures that are proposed for skylark and curlew. To ensure additionality of the Project's BNG, habitat created or enhanced to meet statutory mitigation or compensation for impacts to protected sites or species should be clearly identified in the BNG assessment.

26. We seek clarification that the Habitat Restoration and Substitution 2-Year Rule from the Metric has been adhered to. The approach to replacing habitat that cannot be restored within two years aligns with the strict Statutory Biodiversity Metric trading rules. If habitat is lost, it must be compensated with "like-for-like" or "like-for-better" quality habitats. The 2-Year Timeframe accounts for the time it takes for new habitat to reach its target condition. If a habitat cannot reach a suitable condition quickly, this delay increases the biodiversity unit deficit, reinforcing the need for immediate, high-quality replacement or off-site alternatives.

27. We note that some of the fields have been used for pig rearing. It is important that this is taken into account when planning habitat creation schemes as this will effect habitat creation possibilities.

Long-Term Management and Monitoring

28. NWT strongly recommends that the Landscape and Ecology Management Plan is secured for a minimum of 30 years, or for the full operational lifetime of the project. Furthermore, newly created or enhanced habitats should be retained beyond decommissioning, delivering a permanent net gain.

29. Section 7.5 of the oLEMP outlines plans for long-term monitoring. We strongly recommend that bat surveys are included within the monitoring strategy.

30. We welcome the concept introduced in paragraph 7.5.4 of the oLEMP which discusses opportunities to link up with academic research bodies, NGOs etc and recommend that this is taken forward.

Summary

31. Norfolk Wildlife Trust will engage with the Examination primarily via the submission of Written Representations and the agreement of a Statement of Common Ground, although we may wish to attend specific hearings. This Statement clearly sets out our areas of interest and offers more detailed comment, which we will look to update if required.

32. Norfolk Wildlife Trust look forward to continued discussions with the developer on the above topics and hope to see genuine positives for biodiversity in Norfolk delivered as part of this project.

Yours sincerely,

[redacted]
Campaigns and Policy Officer

planning@norfolkwildlifetrust.org.uk

Norfolk Wildlife Trust Summary of Written Representations on The Droves Solar Farm

Norfolk Wildlife Trust (NWT) supports the transition to renewable energy and recognises the role of solar power in helping the UK achieve net-zero carbon emissions. However, its support for the proposed Droves Solar Farm is conditional on the project avoiding harm to wildlife, delivering meaningful biodiversity gains, contributing to nature recovery, and providing long-term environmental benefits.

While NWT acknowledges efforts made by the developer to avoid impacts on protected wildlife sites, it considers that further information, design refinement, and stronger ecological safeguards are required before the project can be considered environmentally acceptable. The Trust emphasises the importance of adhering to the mitigation hierarchy, prioritising impact avoidance before mitigation or compensation measures are considered.

A key concern relates to the proposed location of the Battery Energy Storage System (BESS) and substations in Fields 24 and 27, which support some of the highest levels of bat activity recorded on site. NWT is concerned that lighting and noise associated with this infrastructure could adversely affect bats and other nocturnal wildlife. It recommends relocating these facilities where possible or implementing robust mitigation and buffer measures. The Trust also seeks greater clarity on infrastructure locations and bat protection measures, particularly regarding how buffer distances around potential bat roosts will be determined.

NWT highlights the need to protect the River Nar Site of Special Scientific Interest (SSSI), which is hydrologically connected to the site. It stresses that strong pollution prevention measures must be in place during construction to prevent contaminated runoff or chemical spills reaching the river and damaging sensitive habitats.

Concerns are also raised regarding impacts on local Roadside Nature Reserves, woodland habitats, and watercourses. NWT recommends wider buffer zones, including at least 20 metres around water bodies and 30 metres around woodland supporting bats. Clarification is requested regarding the extent of temporary impacts to woodland vegetation.

The Trust identifies several species-specific concerns. It warns that proposed pylons crossing land intended for skylark and curlew mitigation could reduce the effectiveness of these measures by increasing collision risks and providing perches for predators. It also requests more information on hedgerow losses associated with access widening and recommends additional stone curlew surveys, extending beyond the site boundary and covering multiple breeding seasons due to the species' sensitivity to disturbance.

NWT welcomes the project's biodiversity enhancement ambitions, including proposed increases in habitat and hedgerow units. However, it stresses that Biodiversity Net Gain (BNG) must align with best practice and the Local Nature Recovery Strategy. Habitat created for mitigation of protected species impacts should not also be counted towards BNG targets. The Trust also seeks confirmation that biodiversity metric rules relating to habitat replacement and restoration timescales have been properly applied and notes that previous pig-rearing activities on some fields may affect habitat creation opportunities.

Finally, NWT strongly supports long-term habitat management and monitoring. It recommends that the Landscape and Ecology Management Plan be secured for at least 30 years, or ideally for the full operational life of the project, with newly created habitats retained beyond decommissioning. The

Trust also advocates for ongoing bat monitoring and collaboration with academic and conservation organisations to maximise biodiversity outcomes.

Overall, NWT supports renewable energy development in principle but seeks stronger ecological protections and clearer commitments to ensure The Droves Solar Farm delivers genuine and lasting benefits for biodiversity in Norfolk.