

Date: 02 June 2026  
Our ref: [REDACTED]



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**BY EMAIL ONLY**

Dear Sir/Madam,

**NSIP Reference Name / Code: The Drovers Solar Farm / EN0110013**

**Title: Natural England's Written Representations**

**Examining Authority's submission deadline: 02 June 2026**

Natural England (NE) is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England's full detailed comments on this application can be found in our Relevant Representations (our ref [REDACTED], dated 26 February 2026), which were 'front-loaded' to ease engagement through examination. As a result, the contents of this letter are intended to summarise updates to our advice, without repetition of the advice already provided. Where no update is provided, our previous advice should be relied upon in our Relevant Representations.

Ongoing engagement between Natural England & the Applicant:

The Applicant has engaged with Natural England since submission of our Relevant Representations on the Applicant's draft Statement of Common Ground (SoCG) which is expected to be submitted at Deadline 1. This SoCG should clearly set out both where Natural England and the Applicant have agreed matters, and where matters remain under discussion. Natural England will continue to work with the Applicant to update the SoCG throughout the Examination.

Included within the SoCG, Natural England has included our estimation as to the likelihood that disagreement will remain by the end of the examination ('Low', 'Medium' and 'High').

Summary of Updated Advice:

In our Relevant Representations, Natural England did not raise any 'Red' fundamental concerns but did identify outstanding 'Amber' items. The following provides a summary of progress in relation to these items:

I. Conservation Designations

Natural England has highlighted to the applicant that standard advice in relation to air quality impacts on designated sites remains applicable. This standard advice is Natural England's formal statutory advice. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on proposals with potential air pollution impacts. An overall conclusion regarding impacts on statutory protected sites must take into account this standard advice.

## II. Soils

Natural England has advised the applicant that we welcome the principle of securing a detailed Soil Management Plan through the Development Consent Order. However, Natural England's position remains that the outline information is currently high-level and does not yet provide sufficient detail to demonstrate that soils, particularly Best and Most Versatile land, can be adequately protected, reinstated and monitored.

Natural England has raised the need for further evidence to demonstrate that the Agricultural Land Classification survey provides full coverage of the site (including associated infrastructure), that the assessment of effects adequately reflects both permanent and longer-term impacts to soils, and that the proposed approach to soil handling and reinstatement is sufficient to avoid permanent degradation where restoration is relied upon.

## III. Protected Species

The Applicant has indicated that protected species licences are not anticipated at this stage, despite the Environmental Statement identifying the presence of protected species within the Order Limits.

Natural England has advised that the need for licensing should be kept under review as protected species are dynamic and further surveys may be required prior to construction to confirm baseline conditions. We have also highlighted to the Applicant that the retention of badger setts may not necessarily remove the need for licensing where works have the potential to disturb badgers occupying a sett or affect habitat relied upon by the species.

Natural England also notes that other Relevant Representations identify evidence of previous stone curlew (*Burhinus oedicanus*) within the project area, and that this species may therefore be a relevant ecological consideration. The proposed order limits are approximately 5km from Breckland SPA at their nearest point. Should further surveys find Stone Curlew nests within the proposed order limits, Natural England would not consider these nests to be part of the SPA population. However, consideration of stone curlew as a protected species may still be required if there is historical evidence of stone curlew nesting in the area.

As previously advised in Natural England's response to the Targeted Section 42 Consultation (our ref [REDACTED], dated 19 September 2025), the full species name, Eurasian curlew (*Numenius arquata*), or stone curlew (*Burhinus oedicanus*) should be used to avoid any confusion when referencing these species.

## IV. Outline Landscape and Ecological Management Plan

Natural England welcomes the Applicant's commitment to update the Outline Landscape and Ecological Management Plan, including to reflect the published Norfolk Local Nature Recovery Strategy at Deadline 1.

However, Natural England's position remains that the document is currently high-level and does not yet provide sufficient detail to give confidence in the delivery of proposed mitigation, enhancement and biodiversity net gain outcomes. In particular, further detail is required regarding how habitats will be established and managed, the success criteria that will be applied, the monitoring framework, and the mechanisms for implementing remedial action where required.

## V. Biodiversity Net Gain

Natural England welcomes the demonstration of biodiversity net gain and notes that a minimum of 10% biodiversity net gain in habitat and hedgerow units is proposed to be secured through the Development Consent Order.

Natural England notes the Applicant's position that on-site drainage features do not meet the definition of a watercourse ditch (which typically includes features that are less than 5 metres in width and retain water for at least 4 months of the year). Natural England has advised that, where it can be demonstrated

with sufficient evidence that such features do not meet the relevant definition in the Statutory Biodiversity Metric User Guide, Natural England would have no objection in principle to their exclusion. However, in the absence of such evidence, Natural England's position remains that these features should be appropriately considered within the biodiversity net gain calculation.

#### Examiners First Written Questions

Natural England has provided comments in relation to the Examining Authority's First Written Questions in a separate document named, *548614 EN0110013-000413-Examining Authority's Written Questions 1 (ExQ1) - Natural England Comments 02\_06\_26* (our ref: [REDACTED]) and refers the Examining Authority to that submission.

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For any further advice on this consultation please contact [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely,

[REDACTED]  
Norfolk and Suffolk Sustainable Development