

# The Drovers Solar Farm

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## Statement of Common Ground (SoCG) with Historic England

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# 1 Introduction

## 1.1 Overview

- 1.1.0 This Statement of Common Ground (SoCG) has been prepared as part of the application for a Development Consent Order (DCO) (the DCO Application) for The Drovers Solar Farm (the Scheme) made by The Drovers Solar Farm Limited (the Applicant) to the Secretary of State for Energy Security and Net Zero (SoS) pursuant to the Planning Act 2008.
- 1.1.1 SoCGs are an established means in the DCO consenting process, of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.
- 1.1.2 This SoCG has been produced to confirm to the Examining Authority (the ExA) where agreement has been reached between the parties, and where agreement has not yet been reached.

## 1.2 Parties to this Statement of Common Ground

- 1.2.0 This SoCG has been prepared by the Applicant and Historic England (HE).
- 1.2.1 Collectively, the Applicant and HE are referred to as ‘the parties.’

## 1.3 Purpose of this Document

- 1.3.0 This SoCG is a ‘live’ document and will be amended as the examination progresses, including as more information becomes available and as a result of ongoing discussions between the Applicant and HE, in order to enable a final version to be submitted to the ExA.
- 1.3.1 The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.

## 1.4 Terminology

- 1.4.0 This SoCG summarises the main topics covered and the status of the matter. The colour coding system used within the table in Section 4 has been outlined below.



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Cell	Status
Green	Agreed – indicates where an issue has been resolved.
Yellow	Under Discussion – indicates where points continue to be the subject of ongoing discussions wherever possible to resolve, or refine, the extent of disagreement between the parties.
Red	Not Agreed – indicates a position where both parties have reached a final position that a matter cannot be agreed between them.



## 2 The Scheme

### 2.1 Scheme Description

- 2.1.0 The Scheme is a Nationally Significant Infrastructure Project (NSIP) for the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development comprising a Battery Energy Storage System (BESS), a Customer Substation and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50 megawatts (MW) Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.
- 2.1.1 The **Location Plan** [\[APP-007\]](#) shows the Order limits for the Scheme, which is approximately 840 hectares (ha) of land within Norfolk (the 'Order limits').



## 3 Record of Engagement

### 3.1 Summary of Engagement

3.1.0 The parties have been engaged in consultation since December 2024.

3.1.1 A non-statutory consultation took place between 17 September and 1 October 2024. The statutory consultation process took place between 21 May and 9 July 2025.

3.1.2 The Applicant and HE have engaged throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has included discussions on preserving the significance of below and above ground heritage assets.

3.1.3 Table 3.1 shows a summary of key engagement that has taken place between the Applicant and HE in relation to the Application.

**Table 3.1 – Record of Engagement**

Date	Form of Correspondence	Key topics discussed and key outcomes
December 2024	Written responses to EIA Scoping	Agreement of the type and scope of baseline assessments Agreement of geographic extent of assessment Agreement of methodology to be employed in assessing significance and impact
June 2025	Teams meeting	Discussion of Preliminary Environmental Impact Report (PEIR) prior to issuing of formal PEIR response. These discussions primarily focussed on completing archaeological surveys and potential impacts to designated



		heritage assets within Castle Acre and the siting of the built form to the north of Bartholomew's Plantation.
July 2025	Written responses to PEIR	<p>HE confirmed broad agreement with the assessment presented in the PEIR, albeit that they will require refining through finalisation of the scheme infrastructure and layout.</p> <p>Recommendations were made with regards to HE guidance on piling and geoarchaeology. These documents have been referenced in <b>ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161]</b>.</p> <p>Recommendation was made to position the substations in Fields 24, 26 or 27 rather than Fields 33 and 35. Following these comments, the substations are proposed to be located within Field 27 <b>ES Figure 5.1: Concept Masterplan [AS-022]</b>.</p> <p>Recommendation that visualisations and assessment of visual impacts of the proposed development are revisited once the proposed overhead line layout and pylons are known. Assessments of the impacts are presented in <b>ES Chapter 8: Cultural Heritage and Archaeology [APP-057]</b> and visualisations are presented in <b>ES Figures 6.14 to 6.15 [AS-039 to AS-049]</b>.</p>
November 2025	Email regarding Potential Main Issues for Examination	HE confirmed they needed the opportunity to review full documentation before HE is able to say whether all issues will be resolved prior to examination.
February 2026	Written response on Relevant Representations	<p>HE noted that it would welcome the opportunity to see if further mitigation could be employed.</p> <p>HE noted some disagreement on levels of significance, contribution of setting and expression of impact raised, but no detail given at this stage.</p> <p>HE expressed a preference for Scenario B in relation to overhead power lines.</p>



April 2026	Teams meeting	Discussed responses from the Relevant Representations to provide clarity and with a view to agreeing the basics of the SoCG.
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- 3.1.4 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Applicant and HE in relation to the issues addressed in this SoCG.

## 4 Matters of Discussion

### 4.1 Overview

- 4.1.0 The following tables detail, by topic, the matters agreed, under discussion, or not agreed between the Applicant and HE at the point of this document being published.
- 4.1.1 Where discussions are ongoing, the parties will include an indication of the likelihood that disagreement will remain by the end of the examination in accordance with the **Rule 6 letter** [\[PD-006\]](#).



Reference	Topic	Consultee's Position	Applicant's Position	Status
HER 1-1	Baseline Surveys	<p>The baseline surveys undertaken to inform the ES are adequate and do not require any additional work or further baseline surveys. These baseline surveys comprise:</p> <p><b>ES Appendix 8.2: Stage 1 and Stage 2 Setting assessment [APP/6.4]</b></p> <p><b>ES Appendix 8.3: Archaeological Desk Based Assessment [APP/6.4]</b></p> <p><b>ES Appendix 8.4: Geophysical Survey Report [APP/6.4]</b></p> <p><b>ES Appendix 8.5: Aerial Photographic Assessment [APP/6.4]</b></p> <p><b>ES Appendix 8.6: Archaeological Trial Trenching Report [APP/6.4]</b></p>	<p>The Applicant welcomes the clarification that the baseline surveys are adequate without the need for any further work.</p>	Agreed



HER 1-2	Overhead lines and pylons	The greatest impact of the Scheme upon the significance of designated heritage assets derived through their settings will be from the additional pylons. HE would prefer to see Scenario B undertaken and would like to see greater commitment from the Applicant with regard to this.	<p>The Applicant's preference is also Scenario B, but cannot commit (at this stage) to which scenario will be taken forward. This confirmation will come at detailed design stage.</p> <p>Whilst Scenario A presents a greater impact than Scenario B, the effect in each case is not considered significant in EIA terms and it is considered that appropriate mitigation to reduce impact is provided.</p>	Under discussion
HER 1-3	Additional Mitigation to potential setting impacts	There are some views of the Scheme (additional pylons and limited sections of solar panels) from Castle Acre Castle, Priory and Conservation Area which remain despite provision of mitigation. We would welcome the chance to explore if any additional mitigation can be achieved.	No further mitigation is possible due to height of pylons and/or topographic considerations.	Under discussion



HER1-4	Contribution of setting to Castle and Priory	<p>We consider setting makes a higher contribution to significance of both than is set out in the ES.</p> <p>This will be covered in our written rep.</p>	<p><b>ES Chapter 8: Cultural Heritage and Archaeology [APP-057]</b> and <b>ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]</b> detail the contribution of setting to the significance of both the Castle and Priory.</p> <p>The east-west axis, which links the castle, settlement, church and priory provides the most context to the monuments and is, therefore, the key element of setting. The views to the south from the castle are recognised as important in terms of illustrating the topographic importance of the castle to this defensive position overlooking a crossing point of the Nar, although as individual elements such as the roads are difficult to discern in these views, and the landscape is essentially one of 18th/19th century character the contribution to significance is considered less than that provided by the east-west axis of contemporary monuments.</p>	Under discussion
HER 1-5	Significance of Conservation Area	<p>We agree a medium value for conservation areas to be appropriate in most instances.</p> <p>In relation to Castle Acre agreed we consider it to be of a higher value.</p>	<p>With regards to the assessment of significance of Castle Acre conservation area, the criteria for assigning Sensitivity/Value (which roughly equates to levels of significance but using EIA terminology) is clearly defined within <b>ES Chapter 8: Cultural Heritage and Archaeology [APP-057]</b>. The criteria used for determining Sensitivity/Value, and the value ascribed to Castle Acre Conservation Area is the same as that presented at PEIR, with which Historic England stated that they were in agreement.</p>	Under discussion



HER 1-6	Explicit identification of Harm	Whilst the approach within the ES of the assessment of level of harm in relation to assets is adequate, HE do not concur with levels of impact in all cases.	The levels of impact described in <b>ES Chapter 8: Cultural Heritage and Archaeology [APP-057]</b> are considered to be explicit. Section 8.5 of the chapter details the criteria for assessing impact in explicit terms. This methodology was detailed in both the scoping report and PEIR, which HE agreed with.	Agreed
HE 1-7	Impacts to Designated Heritage Assets	<p>The assessment is adequate for the purposes of examination in relation to the following heritage assets:</p> <ul style="list-style-type: none"> <li>- Great Palgrave Deserted Medieval Village</li> <li>- Moated Site north of All Saints Church</li> <li>- All Saints Church</li> <li>- Church of St James</li> <li>- Church of St George</li> <li>- High House</li> <li>- High House Stable and Curtain Wall</li> <li>- Little Palgrave Hall</li> <li>- South Acre Conservation Area</li> </ul>	<p>These assets are covered in <b>ES Chapter 8: Cultural Heritage and Archaeology [APP-057]</b></p> <p>The applicant welcomes this agreement.</p>	Agreed
HE 1-8	Impacts to Designated Heritage Assets	HE do not agree with the identified levels of impact to the	The Applicant maintains that the impacts identified within <b>ES Chapter 8: Cultural Heritage and Archaeology [APP-057]</b> with	Under Discussion



		<p>following Designated Heritage Assets:</p> <ul style="list-style-type: none"> <li>- Castle Acre Castle</li> <li>- Castle Acre Priory</li> <li>- Castle Acre Conservation Area</li> </ul> <p>In each case the impact identified by HE is higher just one step above that identified by the applicant,</p>	<p>explicit reasoning given in paragraphs 8.833 - 8.8.38 (Castle), 8.8.39 - 8.8.42 (Priory) and 8.8.64 - 8.8.66 (conservation area), are appropriate.</p>	
HER 1-8	Archaeological Mitigation	<p>Some concerns were raised in the various Relevant Representations over the archaeological mitigation strategy. Further discussion has shown that the mitigation strategy has been devised in consultation with Norfolk County Council Historic Environment Service (NHES) and is, therefore, considered satisfactory.</p> <p>Comments to be addressed in our written rep.</p>	<p>The various below ground impacts of the Scheme have been discussed with Norfolk County Council Historic Environment Service (NHES) and have been used to inform <b>Appendix 8.7: Archaeological Mitigation Strategy [APP-161]</b>. In consultation with NHES, the Archaeological Mitigation Strategy has been designed to have flexibility to allow for appropriate archaeological mitigation once full details of the Scheme impacts are known.</p>	Under Discussion



**THE DROVES**  
SOLAR FARM