

The Drovers Solar Farm

Statement of Common Ground (SoCG) with Natural 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 Natural England.
- 1.2.1 Collectively, the Applicant and Natural England 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 Natural England, 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.



| Cell | Status |
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| Agreed | Agreed – indicates where an issue has been resolved. |
| Under Discussion | 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. |
| Not Agreed | 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 Natural England have engaged throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has included Natural England's Scoping Opinion, consultation comments, and Relevant Representation.

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

Table 3.1 – Record of Engagement

| Date | Form of Correspondence | Key topics discussed and key outcomes |
|---------------|---|---|
| December 2024 | Natural England Environmental Impact Assessment Scoping Opinion | <ul style="list-style-type: none">• Soils• Designated Sites – comments welcomed and addressed within DCO application |
| July 2025 | Natural England consultation comments | <ul style="list-style-type: none">• ALC Survey – addressed within DCO application• Soil Management Plan – addressed within DCO application |



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| | | <ul style="list-style-type: none"> • Siting of Permanent Infrastructure • Air Quality impacts on Designated Sites – addressed within DCO application • Water Quality impacts on Designated Sites – addressed within DCO application • Protected Species Assessment – addressed within DCO application • Tree Survey Required – addressed within DCO application • Biodiversity Net Gain (BNG) Advised – addressed within DCO application • Management Plans Required – addressed within DCO application |
| <p>26 February 2026</p> | <p>Natural England's Relevant Representation</p> | <ul style="list-style-type: none"> • International Designated Sites – addressed within DCO application • National Designated Sites – addressed within DCO application • Protected Species – licensing queried and further information provided • Biodiversity Net Gain (BNG) – ditches and inclusion of the published LNRS queried and further information provided • Ancient woodland and ancient/veteran trees – addressed within DCO application • Outline Landscape and Ecological Management Plan (oLEMP) – updates in regard to published LNRS, inclusion of measurable success criteria, species-rich grassland establishment details, hedgerow removal details, curlew mitigation details, details of lighting in respect of bats, recreational pressure, and habitat performance indicators requested. The Applicant confirms it has updated the oLEMP at Deadline 1 to reflect these matters. |



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| | | <ul style="list-style-type: none">• Soils and best and most versatile agricultural land• Soils and Agriculture• Soil Management Plan |
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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 Natural England 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 Natural England 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** [\[PD-006\]](#).



Table 4.1 – Land Use and Agriculture

| Reference | Topic | Consultee's Position | Applicant's Position | Status |
|-----------|-------|---|---|---|
| 1-1 | Soil | <p>Natural England agrees with the principle of securing a detailed Soil Management Plan (SMP) through the DCO. However, the outline SMP is currently high-level and does not provide sufficient detail to demonstrate that soils, particularly Best and Most Versatile (BMV) land, can be adequately protected, reinstated and monitored.</p> <p>Natural England considers that the current methodology for determining the scale of effect to BMV land may not adequately capture the combined and cumulative impacts of permanent and long-term soil loss across the Scheme, which could lead to an underestimation of their overall significance.</p> <p>Additional concerns relate to reliance on provisional data at the site selection stage, incomplete survey coverage across the Scheme, including in relation to grid connection infrastructure, and the potential for temporary construction activities to result in permanent soil degradation if not appropriately managed. Further evidence is therefore required to</p> | <p>The Applicant agrees that inappropriate working has the potential to result in long-term soil damage or possibly permanent land quality change. The ES Chapter 11 Soils and Agriculture [AS-018] considers the potential and concludes that the potential for such effects is limited to the areas set out in Table 11-7. Most of these areas are capable of restoration on decommissioning, subject to good practice. The outline Soil Management Plan (SMP) [APP/7.13.1] sets out the principles. The SMP will be secured as a pre-commencement condition under the DCO (Draft DCO, Schedule 2 Requirements, requirement 17) [APP/3.1.1], and -will incorporate all of the matters suggested for inclusion by NE.</p> <p>The temporary and permanent effects have been considered in Chapter 11.</p> | <p>Under Discussion</p> <p>Low – providing Natural England advice is followed</p> |



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| | | demonstrate that impacts to soil resources can be avoided or adequately mitigated. | | |
| 1-2 | ALC survey density | Natural England notes the Agricultural Land Classification (ALC) survey undertaken and associated methodology. We commend the survey density of one auger sample per hectare. However, concerns remain regarding the completeness of survey coverage and how the data has been applied within the assessment, rather than survey density alone. | This is noted. The results are set out in Appendix 11.2: Agricultural Land Classification [APP-168] . | Under Discussion Low – providing Natural England advice is followed |
| 1-3 | Siting of permanent infrastructure | Natural England maintains that impacts to BMV land should be avoided where possible and that siting and design should minimise permanent loss of BMV land. Further justification is required to demonstrate how impacts have been avoided and minimised. | The comment is noted. The use of BMV land, especially for items of fixed equipment or mitigation planting, was an important consideration in the design process and the determination of the overall layout. A description of micro-siting considerations is provided throughout ES Chapter 11 Soils and Agriculture [AS-018] . In balancing operational and environmental considerations, and in recognition that for many of the construction works full restoration to comparable ALC grade will be achievable, the use of BMV could not be avoided. The environmental assessment considers the effects on a likely, and a worst-case, scenario in paragraph 11.8.49 through to 11.8.54. | Under Discussion Low – providing Natural England advice is followed |



Table 4.2 – Ecology and Biodiversity

| Reference | Topic | Consultee's Position | Applicant's Position | Status |
|-----------|--------------------------------|---|---|--|
| 2-1 | International Designated Sites | Natural England concurs with the conclusion of the Shadow Habitats Regulations Assessment (SHRA) that likely significant effects on European sites can be ruled out, either alone or in combination with other plans or projects, and that there is therefore no need to progress to Stage 2 Appropriate Assessment. Standard advice applies with respect to air emissions | As set out within the Shadow Habitats Regulations Assessment [AS-057] , likely significant effects on European sites can be ruled out, either alone or in combination with other plans or projects, and that there is therefore no need to progress to Stage 2 Appropriate Assessment. As such, all matters are considered to be agreed in relation to International Designated Sites and HRA. | Agreed (but Natural England's standard advice on air quality should be considered) |
| 2-2 | National Designated Sites | The Nationally Designated Sites of relevance are: Breckland Forest SSSI, River Nar SSSI, Potter & Scarning Fens, East Dereham SSSI <u>Breckland Forest SSSI</u> Chapter 7 of the ES identifies Breckland Forest SSSI 2.7km from the proposed development and based on the information presented in the ES, Natural England concurs with the conclusion that there will be no significant adverse effects on the site. <u>River Nar SSSI</u> | Consideration in regard to potential likely significant effects on National Designated Sites is set out within ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] . Where appropriate, mitigation measures (in particular measures in relation to surface water run-off in relation to the River Nar SSSI are identified within the oCEMP [APP/7.6.1] and secured through Requirement 13 in Schedule 2 to the draft DCO [APP/3.1.1] . As such, it is concluded that there will be no significant adverse effects on National Designated sites and all matters are agreed in relation to such designations. | Agreed (but Natural England's standard advice on air quality should be considered) |



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| | | <p>With consideration of air emissions potentially impacting the River Nar SSSI, we refer you to Appendix 1 of this letter - <i>Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs)</i>.</p> <p>Chapter 7 of the ES identifies a hydrological link to the River Nar SSSI from the proposed development site, and there is the potential for chemical spills and contaminated surface water runoff to reach the River Nar SSSI via overland flows such as ditches, which has the potential to degrade the habitats with adverse effects to the associated faunal and botanical assemblages of the River Nar SSSI. However, on the basis that the embedded mitigation measures detailed within the CEMP are implemented and secured, Natural England concurs that there will be no significant adverse effects on the River Nar SSSI.</p> <p><u>Potter & Scarning Fens, East Dereham SSSI</u></p> <p>Please refer to our comments in NE1 i.e. it is identified there is no hydrological connectivity to the site, and for air emissions we refer you to Appendix 1 of this letter - <i>Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs)</i>.</p> | | |
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| | | No potential likely significant effects on other National Designated Sites have been identified. | | |
| 2-1 | Protected Species | <p>Natural England note that Chapter 7 of the ES identifies that licences may still be required due to the known presence of protected species in the area. However, no indication has been provided that a licence has been/will be applied for. Natural England therefore recommend this is undertaken at the earliest opportunity to prevent delay.</p> <p>We advise our comments at the PEIR stage remain outstanding, , including the need to consider licensing requirements in accordance with Natural England guidance. Applicants should refer to the relevant guidance (Wildlife licences: when you need to apply - GOV.UK) to determine whether mitigation licences are required. Natural England can, via its Discretionary Advice Service (DAS), review a draft licence application and, where appropriate, issue a Letter of No Impediment (LONI).</p> | <p>The potential need for Natural England licencing is discussed in paragraphs 7.9.2 and 7.9.3 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] in regard to Badger.</p> <p>A licence is not currently anticipated to be required needed in respect of Badger given the existing setts are fully retained and subject to appropriate buffers. Given Badger are dynamic animals and levels of Badger activity can rapidly change at a site, with new setts created at any time, an update survey has been recommended prior to works commencing, in order to confirm that no new setts have been created. Should any new setts be identified at that time (within the development area), depending on the up-to-date position at that time, it may be that further measures are required (including potentially licensing should new setts arise within/adjacent to areas requiring construction activity). Clearly it is not possible to predict the future changes in this regard and accordingly, as a matter of best practice the approach that would be taken (i.e. obtaining any relevant licensing should such changes occur) is provided to ensure such eventualities are addressed.</p> <p>No requirement for protected species licences in relation to other species has been</p> | <p>Under Discussion</p> <p>Low – providing Natural England advice is followed</p> |



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| | | | <p>identified. In particular, ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] confirms that no bat roosts will be affected (such that licensing would not be required in regard to roosting bats), whilst given the distance from any ponds supporting Great Crested Newts, no licensing would be required in regard to this species.</p> <p>Accordingly, no licence applications are required at this time, and as such no Letter of No Impediment (LONI) would be appropriate or necessary based on the current position.</p> | |
| 2-2 | Biodiversity Net Gain (BNG) | <p>Natural England welcomes the demonstration of >10% net gains for biodiversity using the Defra Biodiversity Metric.. Natural England would welcome a commitment to delivering in excess of 10%.</p> <p>Natural England note that the assessment states that there are no watercourses within the order limits, however, it is Natural England’s understanding that there are drainage ditches within the development boundary. We therefore recommend that these are considered within the BNG assessment and 10% uplift is also delivered for these habitats. Natural England advise that the Local Nature Recovery Strategies (LNRS), a new mandatory system of spatial strategies for nature established by the Environment Act 2021, could provide</p> | <p>Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1], using the government metric and associated guidance. This demonstrates that the Scheme will deliver a BNG substantially in excess of 10% for Habitat Units and Hedgerow Units.</p> <p>The BNG Assessment and Report and oLEMP have been updated at Deadline 1 to take into account the published Norfolk LNRS and also address trading errors previously identified.</p> <p>Government BNG Guidance set out within The Statutory Biodiversity Metric User Guide (Department for Environment Food & Rural Affairs, First published February 2024 Last updated 3 July 2025) provides a clear</p> | <p>Under Discussion</p> <p>Low – providing Natural England advice is followed</p> |



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| | | <p>opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience. We advise that habitats and species measures within the Landscape and Ecology Management Plan (LEMP) and BNG delivery, should be aligned with the published Norfolk LNRS.</p> <p>Natural England advises that, where ditches can be demonstrated to meet the definition set out in the Statutory Biodiversity Metric User Guide (i.e. less than 5 metres in width and retaining water for at least 4 months of the year), and sufficient evidence is provided to support this, there would be no objection in principle to their exclusion from the BNG assessment. In the absence of such evidence, Natural England maintains that these features should be appropriately considered within the BNG calculation.</p> | <p>definition of a Watercourse Ditch, which the ditches on site do not meet (as they are dry or do not hold water for sufficient periods, as detailed within ES Chapter 12: Water Resources [APP-061]) and therefore watercourse units are not applicable for the Scheme.</p> <p>The BNG (including a minimum of 10% biodiversity net gain in habitat units and hedgerow units) will be secured through Requirement 9 in Schedule 2 to the Draft DCO [APP/3.1.1].</p> | |
| 2-3 | Ancient woodland and ancient/veteran trees | <p>Natural England is in agreement with all matters relating to ancient woodland and ancient/veteran trees, save for the fact that we advise the Applicant to refer to the standing advice produced by Natural England and the Forestry Commission, and we would advise that this guidance is referenced specifically within the LEMP.</p> | <p>The buffers and mitigation measures are in accordance with the Standing Advice produced by Natural England and the Forestry Commission.</p> <p>These measures will be detailed further within the LEMP and CEMP, as requested, and secured as <i>avia</i> the corresponding requirements of the DCO.</p> | Agreed |



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| | | | As such, all matters are considered to be agreed in relation to Ancient Woodland, ancient and veteran trees. | |
| 2-4 | Outline Landscape and Ecological Management Plan (oLEMP) – Norfolk LNRS (7.2.3.-7.2.19) | <p>Natural England welcomes the outline Landscape and Ecological Management Plan (oLEMP); however, we consider that the document could be strengthened and therefore identify this as an amber issue.</p> <p>Natural England has identified the need to</p> <ul style="list-style-type: none"> - update the oLEMP to reflect the final Norfolk LNRS, - strengthen the delivery framework for Biodiversity Net Gain, habitat creation, and long-term monitoring. - Clarify the success criteria, remedial actions, hydrological features within BNG calculations, and responsibilities for ongoing management. - Ensure that potential increases in recreational access and associated pressure on sensitive habitats are appropriately considered and managed. <p>Natural England welcomes the positive commitments within the oLEMP — including significant BNG uplift, grassland creation, woodland and hedgerow establishment, and species mitigation — but advises that additional detail is needed on seed provenance, nesting-</p> | <p>The oLEMP [APP/7.11.1] has been updated at Deadline 1 to reflect the published Norfolk LNRS, including in particular in relation to Priority habitat expansion zones within the Brecks and Nar Valley.</p> <p>Relevant criteria for successful achievement of the BNG outcome in relation to the BNG metric (as set out within the Biodiversity Net Gain Assessment Report [APP/7.4.1]) are provided by the criteria set out within The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology (Defra , 2025).</p> <p>In line with Natural England's advice, further information in regard to measures and remedial triggers will be provided within the detailed LEMP, as secured through Requirements 7 and 9 in Schedule 2 to the Draft DCO [APP/3.1.1].</p> <p>We can confirm the species being referred to is Eurasian Curlew <i>Numenius Arquata</i>.</p> | <p>Under Discussion</p> <p>Low – providing Natural England advice is followed</p> |



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| | | <p>season restrictions, Curlew and Skylark measures, bat-sensitive lighting (if proposed), and long-term monitoring to ensure outcomes can be reliably secured for the lifetime of the development.</p> <p>As per our advice 525376, dated 19 September 2025, we would welcome if you could clarify the exact species of curlew being referred to e.g. Numenius Arquata (Eurasian curlew), or Burhinus oedicnemus (stone-curlew).</p> | | |
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THE DROVES
SOLAR FARM