THE DROVES
SOLAR FARM

The Droves Solar Farm

Statement of Common Ground (SoCG) with Norfolk Wildlife Trust

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Contents

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 Droves Solar Farm (the Scheme) made by The Droves 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 Norfolk Wildlife Trust.

1.2.1 Collectively, the Applicant and Norfolk Wildlife Trust 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 Norfolk Wildlife Trust, 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
	Agreed – indicates where an issue has been resolved.
	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 – 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 October 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 Norfolk Wildlife Trust have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has included Teams meetings, scoping opinion, consultation feedback and relevant representations.

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

Table 3.1 – Record of Engagement

Date	Form of Correspondence	Key topics discussed and key outcomes
23/10/2024	Norfolk Wildlife Trust Scoping Opinion	• Mitigation Hierarchy – addressed within DCO application • BNG – addressed within DCO application • Dispersal Impacts – addressed within DCO application • Lighting – addressed within DCO application • Habitat Management – addressed within DCO application

		• Created Habitats – addressed within DCO application
23/01/2025	Teams Meeting	• Baseline information – addressed within DCO application • Proposed Solar extent – addressed within DCO application • Ecological Designations – addressed within DCO application • BNG – addressed within DCO application
16/07/2025	Teams Meeting	• Buffers – addressed within DCO application • BNG – addressed within DCO application • oLEMP and planting schemes – addressed within DCO application • Bats and lighting – addressed within DCO application • River Nar – addressed within DCO application • RNR – addressed within DCO application • Monitoring – addressed within DCO application • Hedgerows – addressed within DCO application • Community Benefits – addressed within DCO application
July 2025	Norfolk Wildlife Trust's Statutory Consultation Feedback	• BNG – addressed within DCO application • Lighting – addressed within DCO application • River Narr SSSI – addressed within DCO application

		• RNRs – addressed within DCO application • LEMP – addressed within DCO application
February 2026	Norfolk Wildlife Trust's Relevant Representations	• BNG – additionality queried and further information provided. • Local Nature Recovery Strategy – updates requested and Applicant confirmed it has updated the **Biodiversity Net Gain Assessment Report [APP/7.4.1]** and **outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11.1]** at Deadline 1 to reflect the LNRS. • Bats and Lighting – further information requested which has been provided. • RNRs – addressed within DCO application • Buffers – further information requested which has been provided. • Curlew Mitigation – further information requested which has been provided.

3.1.4 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Applicant and Norfolk Wildlife Trust 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 Norfolk Wildlife Trust at the point of this document being published.

4.1.1 Where discussions are ongoing, the parties will included 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 Ecology and Biodiversity

Reference	Topic	Consultee's Position	Applicant's Position	Status
1-1	International Ecological Designations	Norfolk wildlife Trust agrees with the conclusion of the **Shadow Habitats Regulations Assessment [AS-057]** 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.	All matters are considered to be agreed in relation to International Statutory Ecological Designations and HRA.	Agreed
1-2	National Statutory Designations	Following Norfolk Wildlife Trust's review of the submitted **ES Chapter 7: Ecology and Biodiversity [APP-056]** and **oCEMP [APP-186]**, they are satisfied that the embedded mitigation to prevent pollution are sufficient to ensure no adverse effects on the SSSI. They note that these measures should be secured as part of the DCO.	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 **outline Construction Environmental Management Plan (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
1-3	Non-statutory Ecological Designations	NWT has noted the presence of RNRs (U33086 and U22086) for calcareous grassland within the site and immediate vicinity (along River Road) and	River Road Roadside Nature Reserve (RNR) U33086 is fully retained and enhanced within the Scheme, as detailed within the **Biodiversity Net Gain Assessment Report**	Agreed

		recommended that measures are secured to protect the RNRs and where possible enhanced management facilitated. Following the measures set out (including within the **oCEMP [APP-186]**) and subject to these being secured as part of the DCO, NWT agrees that the RNRs will not be adversely affected by the Scheme. Other non-statutory designations (including CWSs and RNRs) are removed from the site and NWT is in agreement that these will remain unaffected.	**[APP/7.4.1]**. Access routes shown remain indicative at this stage and will therefore be determined at the detailed design stage, nonetheless, safeguarding measures, such as appropriate buffers, are set out within the **oCEMP [APP/7.6.1]** to safeguard and avoid adverse impacts on this non-statutory (but locally important) designation and the adjacent RNR U22086 and ongoing management and monitoring measures, such as grassland management, for RNR U33086 are set out within the **oCEMP [APP/7.6.1]** to safeguard this designation. The relevant mitigation measures are therefore secured in the DCO. As such, it is concluded that there will be no significant adverse effects on non-statutory designated sites and all matters are agreed in relation to such designations.	
1-4	Habitats	There are several areas of Priority Habitat within the red line boundary so appropriate mitigation must be in place to ensure that there are no negative impacts on these habitats or the species they support With the exception of impacts on hedgerows and trees and buffers to watercourses, ditches, ponds and woodlands supporting bats no concerns are raised in relation to other habitats, which will remain unaffected and therefore do not require further measures. NWT state "*We welcome the over-arching*	A full assessment of potential impacts to relevant habitats has been undertaken in Section 7.7 and 7.8 of the **ES Chapter 7: Ecology and Biodiversity [APP/6.2.1]**, which concludes that following the implementation of the embedded mitigation and additional mitigation proposed, there will be no adverse likely significant effects. As such, it is concluded that there will be no significant adverse effects on the majority of habitats within the Site and all matters are agreed in relation to such habitats.	Agreed

		principles outlined in the Indicative Masterplan, particularly the intention 'to support nature recovery, the biodiversity strategy aims to strengthen the connections between these habitats – creating ecological stepping stones and wildlife corridors that link the area's key biodiversity hotspots'."		
1-5	Impacts to hedgerows and trees and buffer distances to watercourses, ditches, ponds and woodlands	Norfolk Wildlife Trust 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. NWT agrees that the riparian zone should be avoided, and buffered. 10m from the bank top is the riparian zone itself, therefore a buffer around this area is also required, i.e. not 10m from bank top, as this is the riparian zone itself. Table 7.10 of **ES Chapter 7: Ecology and Biodiversity [APP-056]** states that hedges will have an 8m buffer. NWT recommends that all hedges have at least a 10m buffer. The table also fails to give any specifics regarding buffers around woodlands containing bats and just states a 'case by case' basis. NWT queries how will this be	The vast majority of the hedgerows and trees are retained within the Scheme, along with all of the woodlands, with any removal of hedgerows anticipated to be limited to minor widening of existing gaps to enable appropriate access. Further, the Scheme includes a large amount of new hedgerow planting and enhancement of existing hedgerows. In addition, large buffers to the hedgerows, comprising wildflower grassland and trees, are included within the Scheme design to ensure their protection. Veteran trees are entirely retained and protected within the Scheme. Appropriate buffer distances have been identified in relation to specific habitats, including woodlands supporting bats, and landscape features (which will provide increased stable habitats in relation to the current intensive arable management), as detailed within detailed within **ES Chapter 5: The Scheme [APP/6.1.2].** No watercourses are present within or adjacent to the site and therefore no specific buffer distance is required in regard to watercourses.	Under discussion

		determined, and recommends a minimum of 30m buffer is set.	Comments received from the EA (EA9) requested that the applicant commit to avoiding the riparian zone (defined as 10m from bank top under BNG guidance). Accordingly in order to address this comment and ensure consistency, buffer zones of 10m from bank top have been (at Deadline 1) confirmed within **ES Chapter 7: Ecology and Biodiversity [APP/6.2.1]**, as secured within the **oCEMP [APP/7.6.1]** and secured through Requirement 13 in Schedule 2 to the **Draft DCO [APP/3.1.1]**). In regard to ditches and hedgerows, the stated 8m and 10m buffer distances will provide increased widths of undisturbed habitat in relation to the existing position due to the maintenance and strengthening of permanent vegetation (as identified within the **oLEMP [APP/7.11.1]** and the **Biodiversity Net Gain Assessment Report [APP/7.4.1]** and secured through Requirements 7 and 9 respectively in Schedule 2 to the **Draft DCO [APP/3.1.1]**) replacing intensively managed arable land subject to frequent ploughing disturbance and chemical input. As such, the committed buffers represent betterment over the existing position and remain appropriate in relation to these habitats. In addition, further specific measures are also set out within the **oCEMP [APP/7.6.1]** and **oDS [APP/7.10.1]** to safeguard these features against pollution during the course of the construction and decommissioning phases.	

1-6	Protected Species	With the exception of Bats, and Curlew (see below), no concerns are raised in relation to Protected Species, which will remain unaffected and therefore do not require further measures	It is concluded that there will be no significant adverse effects on the majority of Protected Species and all matters are agreed in relation to Protected Species.	Agreed
1-7	Bats and Lighting	Norfolk Wildlife Trust notes that *"Extensive field areas covered in solar panels may have a negative impact, however, this could potentially be mitigated by maintaining wide buffers of insect-rich habitat around the field edges, along with large hedgerows (i.e. tall and wide) and other enhancements such as introduction of ponds/wetland areas to also help boost insect abundance, alongside no lighting, retention of and mature trees. In particular, we recommend maintaining extra wide insect-rich buffers around any woodlands with bats present."* and *"Visible lighting should be avoided on solar farms to reduce impacts to nocturnal wildlife such as bats, as well as reducing landscape impacts. We would like to see a commitment to the retention of dark corridors for bats. If lighting is necessary it must be minimised and directed away from hedges / woodland / scrub."* Currently, the BESS and National Grid Substation are proposed to be located within fields 24 and 27. These are the fields with some of the highest recordings of bat activity. New lighting will be limited	Measures to control lighting and prevent adverse effects are set out within the **oCEMP [APP/7.6.1]**. Therefore, the Applicant is confident that the design of the Scheme will prioritise avoidance of impacts on nocturnal species. The **ES Appendix 7.2: Baseline Ecological Survey Report [APP-148]** details the results of the bat surveys, which show levels of bat activity at monitored locations throughout the Site including SD1 to north east of Field 27 and SD2 to the east of Fields 24 and 27. It should be noted that there are locations of higher overall bat activity such as SD5 within the Site. Raised levels of Barbastelle registrations were recorded at locations SD2 and SD3 in particular (albeit all locations across the site identified registrations by this species), which is likely to be of particular concern due to its rarer status. This species roosts in woodlands and typically forages close to tree canopies and woodland habitat, and at vegetation edges and can forage over large areas. Hence, the internal field areas within the Site are unlikely to be of value to this species, albeit the woodland and hedgerow corridors (which will be retained	Under discussion

		to locations essential to security, namely the Customer Substation, National Grid Substation, and BESS. Please confirm the width of buffer that will be used for this area.	and strengthened) provide foraging and commuting routes. The Applicant has established a set of Global Design Principles, as set out in the **Design Approach Document [AS-009-AS-011]**. Global Design Principle 2 addresses Environmentally led design, under which the Applicant has developed a series of Design Principles applicable to the Scheme, which includes: • 2.2 – Retain and enhance existing vegetation wherever possible to retain the fabric of the Site and aid integration of the Scheme into its context. In accordance with this design principle the existing hedgerows and woodland within the Scheme have been retained. The Applicant has also enhanced the existing features within the Site, measures include: • 50m offsets associated with Fincham Drove and Petticoat Drove (and respective Public Rights of Way South Acre RB6 and RB1), creating 50m wide routes through the Site, amplifying their role as key green infrastructure corridors and reinforcing their legibility. • Creation of tree belts along the eastern and western edges of Field 27 which will provide connectivity between the woodland blocks. These commitments have been made to improve ecological habitat in these areas, as	

			detailed in the **oLEMP [APP/7.11.1]**. Additionally, commitments to ensure that a sensitive lighting strategy is developed as part of the detailed design to mitigate adverse impacts to bats have been made within the **oCEMP [APP/7.6.1]** and **outline Operational Environmental Management Plan (oOEMP) [APP/7.8.1]**. Due to the Applicant's commitments to improving habitat and mitigating impacts to bats, the bat activity surveys were not an influence on substation location in the design evolution process. The siting of the substations and BESS in Fields 27 and 24 has been assessed on a worst-case basis in **ES Chapter 7: Ecology and Biodiversity [APP/6.2.1]** and concluded that the Scheme will result in no significant effects on bats. The key features identified to support bat commuting and foraging within the site are the hedgerows and woodland edges. The Customer Substation and BESS will be located internally within fields and will not affect boundary features, including no significant light spill anticipated onto boundary features, and as such features of importance for bats will remain unaffected and connectivity maintained within the landscape. The **Design Principles, Parameters and Commitments [APP/5.8.1]** confirms that *"The Solar arrays will not be lit during the*	

			operational phase", such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound.	
1-8	Curlew Mitigation	Norfolk Wildlife Trust has raised concerns in regard to the adequacy of proposed mitigation measures in respect of Curlew. NWT notes 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.	Proposed Skylark and Curlew mitigation measures, set out within the **ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]**, incorporate a range of measures, including the provision of the specific area of 8ha land managed as grassland for use by ground nesting birds including Curlew, commensurate with the existing (low) levels of use of the site recorded (2 pairs of Curlew). Impacts of the Scheme on ground nesting birds (in particular Skylark and Curlew, including with reference to the proposed mitigation and compensation measures) have been specifically considered within Section 7.8 of the **ES Chapter 7: Ecology and Biodiversity [APP/6.2.1]** which concludes no significant effects are anticipated.	Under discussion
1-9	Biodiversity Net Gain	*"NWT acknowledge that there is currently no requirement for mandatory net gain for NSIPs however as this project has committed to providing in excess of 10% net gain it is important that trading rules and best practice principles are followed throughout…We welcome the commitment outlined in the BNG report*	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	Agreed

		that the project will deliver net gain in habitat and hedgerow units substantially in excess of 10%" and recommend a target of 20% is sought. Norfolk Wildlife Trust states that "*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*." Norfolk Wildlife Trust also note that the Local Nature Recovery Plan for Norfolk has now been published so all references to the draft plan need to be updated.	(including in excess of the Norfolk Wildlife Trust's recommended target of 20%). The BNG Assessment Report has been updated at Deadline 1 to take into account the published Norfolk LNRS and address trading errors previously identified. The BNG (including a minimum of 10% biodiversity net gain in habitat units and hedgerow units) is secured through Requirement 9 in Schedule 2 to the **Draft DCO [APP/3.1.1]**. The BNG Assessment Report necessarily provides an objective view of the change in ecological value of the site under the terms of the metric and must reflect the change in value of habitats throughout the site area regardless of the purpose. Nonetheless, whilst habitats providing mitigation or compensation in respect of species such as Skylark and Curlew contribute to the overall BNG, significant new habitats will be created throughout the Site (as identified within the **oLEMP [APP/7.11.1]**, **Biodiversity Net Gain Assessment Report [APP/7.4.1]** and secured through Requirements 7 and 9 in Schedule 2 to the **draft DCO [APP/3.1.1]**), representing the majority of BNG contribution which therefore provide net gains in excess of 10%, such that the guidance in regard to additionality will be fully met.	

1-10	oLEMP	NWT note that an oLEMP has been provided and sets out "*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.".* Norfolk Wildlife Trust note that the Local Nature Recovery Plan for Norfolk has now been published so all references to the draft plan need to be updated.	The **oLEMP [APP/7.11.1]** has been updated at Deadline 1 to make reference to the adopted LNRS and take account of the relevant updates, including provision of additional measures where relevant.	Agreed

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