THE DROVES
SOLAR FARM

The Droves Solar Farm

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

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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 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~~is being submitted to the Examining Authority (the ExA) ~~where agreement has been reached between the parties, and where agreement has not yet been reached~~at Deadline 5 ~~as a~~to reflect the final position between both parties.

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~~ represents the~~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~~position between both parties being 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 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	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. Recommendations were made with regards to HE guidance on piling and geoarchaeology. These documents have been referenced in **ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP-161]**. 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 **ES Figure 5.1: Concept Masterplan [AS-022].** 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 **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** and visualisations are presented in **ES Figures 6.14 to 6.15 [AS-039 to AS-049]**.
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	HE noted that it would welcome the opportunity to see if further mitigation could be employed. HE noted some disagreement on levels of significance, contribution of setting and expression of impact raised, but no detail given at this stage. HE expressed a preference for Scenario B in relation to overhead power lines.

April 2026	Teams meeting	Discussed responses from the Relevant Representations to provide clarity and with a view to agreeing the basics of the SoCG.
July 2026	Teams Meeting	Discussed Written Representations to provide clarity and with a view to agreeing areas of the SoCG.
September 2026	Emails regarding Statement of Common Ground	Drafts of SoCG and suggested amendments exchanged.
October 2026	Emails regarding Statement of Common Ground	Drafts of SoCG and suggested amendments exchanged.
October 2026	Teams Meeting	Discussion of amendments to SoCG to reach a final draft.

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~~submitted.

~~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	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: **ES Appendix 8.2: Stage 1 and Stage 2 Setting assessment [APP/6.4]** **ES Appendix 8.3: Archaeological Desk Based Assessment [APP/6.4]** **ES Appendix 8.4: Geophysical Survey Report [APP/6.4]** **ES Appendix 8.5: Aerial Photographic Assessment [APP/6.4]** **ES Appendix 8.6: Archaeological Trial Trenching Report [APP/6.4]**	The Applicant welcomes the clarification that the baseline surveys are adequate without the need for any further work.	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.~~ proposed in Scenario A. Historic England understands the applicant's preferred choice is for Scenario B. We remain disappointed that a greater commitment to this could not be secured at this stage. However, we accept the applicant has sought to achieve this and has committed to this as a preference.	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. ~~Whist 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.~~	~~Under discussion~~ Agreed
HER 1-3	Overhead lines and pylons	The Holford Rules are also relevant given the overhead powerlines. Rule 2: 'Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, ie the more massive structures which are used when lines change direction. - Where possible choose routes which minimise the effects on the setting of	It is agreed that the Holford Rules are also relevant. Agenda Item 3.1 of the **Written Summary of Applicant's Oral Submissions and Responses to Action Points at Open Floor Hearing 1 [REP1-070]** details how, in responding to a question from the ExA regarding the inclusion of the National Grid Substation in the Order limits, the Applicant noted that NGET's guidelines on siting and design were applied to the site selection exercise, including the Holford Rules. The approach taken by the Applicant, in line with the Holford Rules, is outlined in detail	Agreed

		areas of architectural, historic and archaeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments.	within Appendix 1 (Site Evaluation Report) of the **Planning Statement [AS-076]**.	
HER 1-~~3~~4	Additional Mitigation to potential setting ~~impacts~~impact/s	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~~Historic England broadly accepts the ~~chance~~applicant's conclusion with regard to ~~explore if any additional~~ mitigation ~~can be achieved.~~ planting.	No further mitigation is possible due to height of pylons and/or topographic considerations.	~~Under discussion~~ Agreed

HER1-~~4~~5	Contribution of setting to Castle and Priory	~~We consider setting makes a higher contribution to significance of both than is set out in the ES.~~ ~~This will be covered in our written rep.~~ We accept the applicant has provided an adequate assessment for the purposes of the examination, in relation to the Order Limits. However, we disagree on the extent to which setting (not confined to just the Order Limits) contributes to significance, considering it makes a higher contribution than the applicant has expressed in their assessment.	**ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** and **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]** detail the contribution of setting to the significance of both the Castle and Priory. The assessment provided in Chapter 8 and accompanying appendix does recognise the aesthetic contribution of the wider setting to the significance of the Castle and Priory, although it is focussed on the contextual elements of setting. 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. The focus on these contextual elements should not be taken to mean that aesthetic elements do not contribute to significance, it is just that there is more to say with regards to context. In summary we are in agreement that setting	~~Under discussion~~Agreed

			does make a high contribution to the significance of these monuments.	
HER 1-6	Contribution of setting to designated heritage assets	The comment that 'it would still hold a high level of significance if removed from it setting' rather downplays the importance of the setting of designated heritage assets which is clearly set out in the EN-1 9.9.3.6 and the National Planning Policy Framework (NPPF) 213.	The statement on assets still holding a high level of significance if removed from their setting is not an attempt to 'down play' setting, but rather to highlight that assessment should be of significance as a whole.	Agreed
HER 1-~~5~~7	Significance of Conservation Area	We agree a medium value for conservation areas to be appropriate in most instances. In relation to Castle Acre ~~agreed we consider it to be of a higher value~~Conservation it is agreed that it falls within the Medium Sensitivity category, but at the very upper end of that scale.	With regards to the assessment of significance of Castle Acre ~~conservation area,~~Conservation Area (CACA), the criteria for assigning Sensitivity/Value (which roughly equates to levels of significance but using EIA terminology) is clearly defined within **ES Chapter 8: Cultural Heritage and Archaeology [APP-057].** The criteria used for determining Sensitivity/Value, and the value ascribed to ~~Castle Acre Conservation Area~~CACA is the same as that presented at PEIR, with which Historic England stated that they were in agreement. Whilst CACA is accepted as being an ~~fine~~ example of a Conservation Area, it is not of equivalent sensitivity to a Grade I or II* listing, which are the criteria for High Sensitivity used in **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]**. With each ranking of sensitivity, there will be a range of	~~Under discussion~~ Agreed

			significance, from assets that would only just fall within the range to those which are at the upper end of the range. CACA would clearly lie within the upper range of the medium sensitivity category; however, whilst it contains a number of high-grade assets it also contains many lower grade assets along with buildings and areas of no or very little historic interest.	
HER 1-~~6~~8	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 **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** 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
HER 1-9	Terminology for levels of harm and how they relate to the EIA terminology	HE have identified a 'moderate' level of harm to both the castle and priory (under Scenario A) but this does not directly relate to the tabulated level of impact or effect as laid out in the ES chapter. Following detailed examination of the criteria used to define levels of impact it is agreed that a 'moderate' level of harm equates to a Low Magnitude impact as defined in the ES (albeit at the upper end of that scale). In relation to	The confirmation of HE's 'moderate' harm in relation to high grade assets to mean a Low Magnitude impact and Moderate Effect as defined by the criteria laid out in **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** is welcome, albeit there is still disagreement on levels of harm (see HER1-12 to HER1-14).	Agreed

		High Value assets this would, consequently result in a Moderate Adverse Effect which is significant in EIA terms.		
~~HE~~HER 1-~~7~~10	Impacts to Designated Heritage Assets	The assessment is adequate for the purposes of examination in relation to the following heritage assets: - Great Palgrave Deserted Medieval Village - Moated Site north of All Saints Church - All Saints Church - Church of St James - Church of St George - High House - High House Stable and Curtain Wall - Little Palgrave Hall - South Acre Conservation Area	These assets are covered in **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** The applicant welcomes this agreement.	Agreed
HER 1-11	Impacts to Designated Heritage Assets	In Written Representations HE identified a low level of harm to Narford Hall Registered park and Garden, and by extension to the listed Narford Hall.	As discussed, whilst there is no public accessibility to the avenue, the Applicant's viewshed analysis suggests that, theoretically, there may be some visibility of a small portion of solar panels from a small	Agreed

		However, following further discussion HE are content with the analysis in the Statement of Common Ground that any visibility of panels from the avenue would, therefore, be at oblique angles, partial and filtered, not a part of any key views and only available from a relatively short section towards the southern end of the avenue. This would represent a very minor change to setting.	section of the avenue (as discussed, in ground truthing the viewshed analysis the Applicant has found areas where it suggests visibility when that is not the case but, as yet, has not found the reverse). In Figure 16 of **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]** it is clear that any visibility (if actually available) would be restricted to a very small section of the Scheme and would only be from potentially the last c.200m of the avenue on the approach to Eyetrap Plantation (whose name demonstrates it was the focal point on this approach). The avenue is a linear feature purposefully designed to frame and channel views between the Hall and a classical arch, which was subsequently replaced by Eyetrap Plantation. Any visibility of panels from the avenue would, therefore, be at oblique angles, partial and filtered, not a part of any key views and only available from a relatively short section towards the southern end of the avenue. Such visibility would only represent a very minor change to the assets' setting and would not materially harm the assets' significance. It is, therefore, agreed that the conclusion reached of a Negligible Magnitude impact resulting in a Neutral Effect upon both the Registered Park and Listed Hall is correct.	

~~HE~~HER 1-~~8~~12	Impacts to Designated Heritage Assets	HE do not agree with the identified levels of impact to the following Designated Heritage Assets: - Castle Acre Castle - Castle Acre Priory - Castle Acre Conservation Area In each case the impact identified by HE is higher just one step above that identified by the applicant.	The Applicant maintains that the impacts identified within **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** with 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.	~~Under Discussion~~Not Agreed
HER 1-13	Impacts to Castle Acre Castle and Castle Acre Priory	Scenario A would represent a Low Magnitude impact as defined in the ES (at the upper end of that scale). In relation to the Castle and Priory (High Value assets) this would, result in a Moderate Adverse Effect which is significant in EIA terms. Under Scenario B the magnitude of impact would reduce to Low/Negligible resulting in a Minor Effect (not significant).	Clarification of where HE place the level of impact in terms of how this has been expressed within the ES is welcomed. There remains, however, a disagreement upon the level of impact with the **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** which identifies a Low/Negligible impact from Scenario A resulting in a Minor Effect (not significant) and a Negligible impact from Scenario B resulting in a Neutral Effect (not significant).	Not Agreed
HER 1-14	Impacts to Castle Acre Conservation Area	The impact upon Castle Acre Conservation Area, a Medium Sensitivity Asset, would be of a	The confirmation of how impact relates to EIA terminology is welcomed; however, there remains a disagreement upon the level of	Not Agreed

		Low/Negligible Magnitude resulting in a Minor Effect.	impact with the **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** which identifies a Negligible impact from resulting in a Neutral Effect.	
Note to HER 1-12 to 1-14	The Applicant and Historic England agree that the difference in perceived levels of impact and effect with regards to Castle Acre Priory, Castle and Conservation Area are a difference of professional judgement. Both the Applicant and Historic England are content for these matters to be considered by the Secretary of State in relation to weighing harm versus public benefit.			
HER 1-8~~15~~	Archaeological Mitigation	Some concerns were raised in the ~~various Relevant Representations~~ Written Representation over the archaeological mitigation strategy. ~~Further discussion has shown that~~The comments within the ~~mitigation strategy has~~Written Representations have been ~~devised in consultation with Norfolk County Council Historic Environment Service (NHES) and~~addressed and the AMS is, therefore, considered satisfactory. ~~Comments to be addressed in our written rep.~~	~~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 **Appendix 8.7: Archaeological Mitigation Strategy [APP-161].** 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.~~ Historic England's comments have been addressed in a revised version of the Archaeological Mitigation Strategy **ES Appendix 8.7: outline Archaeological Mitigation Strategy [REP2-016].**	~~Under Discussion~~ Agreed
HER 1-16	Draft DCO	We also recommend the wording of the draft DCO requirement is revised before the end of the examination. The	The Applicant welcomes Historic England's confirmation of its approval of Requirement 12 of the **draft DCO [APP/3.1.5]**, and has responded to the proposed changes to	Agreed

		revised requirement should include additional provision for Historic England's involvement in approval of the mitigation and enhancement measures. The Examination Authority will also need to be satisfied that the requirements are sufficient to mitigate the negative impacts of the proposal on the historic environment.	the **ES Appendix 8.7: outline Archaeological Mitigation Strategy [REP2-016]** in the corresponding rows above.	

5 Signatories

5.1 Overview

5.1.0 The above SoCG is agreed between The Droves Solar Farm Limited (the Applicant) and Historic England, as specified below.

5.1.1 Duly authorised for and on behalf of **The Droves Solar Farm Limited**.

Name:	
Job Title:	
Date:	
Signature:	

5.1.2 Duly authorised for and on behalf of **Historic England**.

Name:	
Job Title:	
Date:	
Signature:	

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