THE DROVES
SOLAR FARM

The Droves Solar Farm

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

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Contents

1 Introduction 1
1.1 Overview 1
1.2 Parties to this Statement of Common Ground 1
1.3 Purpose of this Document 1
1.4 Terminology 1
2 The Scheme 3
2.1 Scheme Description 3
3 Record of Engagement 4
3.1 Summary of Engagement 4
4 Matters of Discussion 6
4.1 Overview 6
5 Signatories 31
Appendix 1 32
Appendix 2 37

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.~~ is being submitted to the Examining Authority (the ExA) at Deadline 6 as a final position between both parties. The document references have not been updated from the original submission. Please refer to the **Guide to the Application [APP/1.3.8]** for the list of current versions of documents.

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~~final position ~~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
	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 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	• Soils • Designated Sites – comments welcomed and addressed within DCO application
July 2025	Natural England consultation comments	• ALC Survey – addressed within DCO application • Soil Management Plan – addressed within DCO application • 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
26 February 2026	Natural England's Relevant Representation	• 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. • Soils and best and most versatile agricultural land • Soils and Agriculture • Soil Management Plan
May 2026 – October 2026	Email exchanges between the Applicant and Natural England	• Sharing drafts of the SoCG for review and comment • Queries raised by Natural England regarding approach to assessing soils impact and loss of agricultural land • Clarification provided by the Applicant, in the form of emails and provision of a technical note • Discussions ongoing, with current position (as of 16 October 2026) captured in this document

		• This document has been updated to reflect the Applicant's final position at 28 October 2026. • The document has been updated to reflect Natural England's final position as of 29 October 2026

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~~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]**.~~

Table 4.1 – Land Use and Agriculture

Reference	Topic	Consultee's Position	Applicant's Position	Status
1-1	Soil	Natural England concurs with the approach to separating out the individual soil matters. However, we highlight that item 1-1(3), is not a matter that Natural England had previously raised as being outstanding.	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000301-6.2.1_ES_Chapter 11 Soils and Agriculture_CLEAN.pdf NE's response raises the following matters, divided as requested by the ExA into separate topics: 1-1(1) whether the Soil Management Plan is adequate; 1-1(2) whether temporary works have been correctly assessed; 1-1(3) whether cumulative effects have been fully captured; 1-1(4) whether the methodology in the ES adequately captures the impacts; 1-1(5) whether reliance upon the provisional ALC maps at the site selection stage was the appropriate methodology; 1-1(6) whether ALC coverage across the Scheme is complete.	N/A
1-1(1)		**Soil Management Plan**	**Soil Management**. The Applicant and NE are in agreement that a detailed SMP will need to be	Agreed

		Natural England agrees that a detailed Soil Management Plan will need to be secured through Requirement 17 of the draft DCO, and approved prior to the commencement of any soil-disturbing works, including trafficking.	provided pre-construction. This can be secured through a DCO Requirement. It is agreed that inappropriate working practices have the potential to result in long-term, or potentially permanent, effects. It is normal for a detailed SMP to be required by DCO Requirement. The Applicant considers that the information provided for this Scheme, which is of a similar or greater detail to many other DCO schemes of a similar nature, provides sufficient information to conclude that the majority of land across the Order limits will not be adversely affected by the Scheme. Soil disturbance, and potential effects on land quality, are limited to generally small areas, all of which have been identified and measured. Subject to a detailed SMP being followed, BMV land can be adequately protected, reinstated and monitored. The soils across the Order limits are described in ES Chapter 11 [**AS-018**] and in the ALC Report [**APP-168**]. Mostly the soils are sandy in nature as described in ES Chapter 11 at 11.6.16. to 11.6.22. Based on ISEP guidance, the majority of soils are described as high resilience to structural damage (low sensitivity), with two areas mapped at Plate 11-39 as medium resilience (medium sensitivity). Given the resilience of the soils and the data provided, the Applicant considers there is adequate information to enable the conclusion that soils and land quality can be protected subject to a detailed SMP. Therefore, there is detailed information and analysis to conclude that BMV (and other) land can be protected and restored. A detailed SMP, to	

			ensure that appropriate works are undertaken during construction, can be secured by DCO Requirement. It is the Applicant's position that item 1-1(1) can be agreed.	
1-1(2)	Temporary Impacts	**Temporary soil impacts** Natural England has previously stated that we do not agree with the statement in paragraphs 11.5.23 and 11.5.24 of ES Chapter 11, as referenced within NE28 of APP/8.4, that temporary short-term impacts are inherently less significant than temporary long-term impacts, and temporary effects are less significant than permanent impacts. Natural England considers that temporary construction activities, including underground cable installation, haul roads, access tracks and construction compounds, have the potential to result in permanent changes to soil structure, function and agricultural land quality if undertaken inappropriately Natural England welcomes the additional commentary provided by Kernon Countryside Consultants Limited (August 2026) regarding the assessment of temporary, reversible impacts on soils. We note that the Applicant has recognised the footnote to Table 3 of the ISEP Guidance (ISEP 2022 A New	The ISEP Guide "A New Perspective on Land and Soil in Environmental Impact Assessment" (February 2022) was used in the assessment in ES Chapter 11. Table 3 of the ISEP Guide states that "**temporary, reversible loss of soil-related features**" is a minor magnitude impact. This is a description of temporary, reversible loss of soil related features, not a description of temporary works. A temporary and reversible impact is of minor (low is used in this ES) magnitude. That is on the assumption that the impact is indeed temporary and reversible. Accordingly, works such as cabling and track installation which are to be restored, and which can be restored without permanent damage to soils, are low magnitude. The ISEP Guide does not differentiate between short-term and long-term temporary impacts. They are all minor (low) magnitude. The footnote to Table 3 states that "**temporary developments can result in a permanent impact if resulting disturbance or land use change causes permanent damage to soils**". If the works result in a permanent effect, therefore, they will not be considered as temporary. They will be considered as a permanent impact, and the quantum of land by ALC grade will be measured and recorded. Where such impacts result in the downgrading of land of BMV quality they will be recorded as a loss of BMV land. This will be added onto other permanent impacts on BMV	~~Under Discussion until ES chapter 11 is updated~~ Not agreed

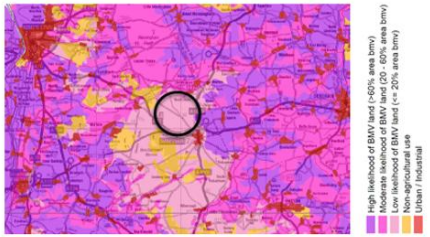
		Perspective on Land and Soil in Environmental Impact Assessment), which states that temporary developments can result in permanent impacts where disturbance or land use change causes permanent damage to soils. However, Natural England considers that paragraph 11.5.143 of ES Chapter 11 should explicitly acknowledge that temporary works can result in permanent damage to soils and agricultural land quality. Subject to this clarification being explicitly incorporated into the ES, Natural England would consider this aspect of item 1-1 to be resolved. From this clarification, it is our understanding that the EIA has been undertaken on the basis that standard mitigation measures will be implemented through the detailed Soil Resources and Management Plan (SRMP), to be prepared prior to construction. We are satisfied that after mitigation, the potential impact on the soil resource from the temporary activities will be temporary, and thus a minor magnitude. We reiterate that whilst works such as cabling and track installation which are to be restored, can be restored	(such as non-removeable fixed infrastructure) within the assessment. Permanent impacts may be minor, moderate or major depending upon quantities involved. The risk of temporary works (e.g. cable installation) causing permanent impacts is recognised in paragraph 11.5.13 of ES Chapter 11 **[AS-018]** and the Criteria for Determining Magnitude Table 11-2 both identify that an impact is a "*loss (including permanent sealing or land quality downgrading)*". That is why a detailed Soil Resources and Management Plan will be needed pre-construction, and will need to be followed, to prevent permanent impacts. If followed (and this 'following' is secured via a DCO requirement, the breach of which would be a criminal offence), the impacts should be temporary and so of low (minor) magnitude. Therefore, the risk of temporary works causing permanent damage is agreed and has been recognised in the ES and used in the assessment, and this is clarified above. A detailed SRMP is to be required pre-construction, secured via a DCO requirement (the breach of which is a criminal offence). ~~When the matters raised in (1-1 (4)) have been resolved the ES Chapter will be updated and this matter can be amended to 'Agreed'.~~ The Applicant's final position is that, as it is agreed between the parties that the assessment has been	

		without permanent damage to soils, there can be permanent damage if soil handling is undertaken incorrectly. It is in such circumstances, that the impact would be major. For example, if soils are inappropriately mixed with a different soil type or non-soil material during storage, or lost via erosion. This would result in a permanent impact on the soil resource. The implementation of standard soil management should mitigate this risk. So, whilst the mitigated magnitude is minor, the unmitigated magnitude would be major. ~~Until the matters relating to the recognition of permanent impacts arising from temporary works are resolved, Natural England maintains item 1-1 (2) to be outstanding.~~ Chapter 11 of the Environmental statement (21 August 2026) still maintains in paragraph 11.5.14, "The ISEP Guide defines a "temporary, reversible loss of soil-related features" as a low magnitude impact and this has been adopted for this assessment.", and in Paragraph 11.5.23 that,	undertaken correctly, there is no requirement to amend the ES.	

		"The assessment also considers whether the effects are temporary or permanent. This affects overall significance. The reversibility of an effect will influence the assessment of significance. Temporary short term impacts are less significant than temporary long-term impacts. Table 3 of the ISEP Guide places "temporary, reversible loss of soil-related features" in the low magnitude category. Accordingly temporary effects are no more than low magnitude." Therefore, Natural England consider that this matter is not agreed as the ES Chapter 11 does not explicitly acknowledge (within the chapter itself) that temporary works can result in permanent damage to soils and agricultural land quality.		
1-1(3)	Cumulative Impacts	-Natural England has not previously raised concerns regarding the use, or lack of, of the categories *short-term temporary, long-term temporary or permanent* for determining cumulative impacts.	**Capturing Cumulative Impacts Across the Scheme**. The ES in Chapter 11 considers each and all of the components of the Scheme, as short term temporary, long term temporary or permanent, by ALC grade. Natural England is now satisfied that this has been captured in the assessment.	Agreed
1-1(4)	Magnitude Criteria	**Combined permanent and long-term soil losses – significance of effect**	The Applicants full response to this matter is included at Appendix 1 to this document.	~~Under discussion~~

		Natural England previously stated that APP/6.2.1 identifies impacts affecting 20 hectares or more of Best and Most Versatile (BMV) agricultural land as a significant effect and is satisfied that the assessment methodology captures the combined permanent and long-term impacts reported by the Applicant. However, following further review it has been noted that whilst the ISEP guidance (ISEP 2022 A New Perspective on Land and Soil in Environmental Impact Assessment), has been referenced, it has not been adhered to in full, in particular, the use of the significance of effect tables. As a consequence, there remains an outstanding concern regarding the thresholds used for determining the significance of effect of permanent land take on soils. Natural England has reviewed the additional comments provided by Kernon Countryside Consultants Limited (The Droves Solar Farm EN0110013 Explanation Regarding Assessment Tables and the ISEP Guide, August 2026 (Applicants note: this has been appended to this document at Appendix 2), and the "Assessment Of Agricultural Effects:	The Applicant considers that the ES realistically assesses the significance of effects, and that there is therefore no requirement to amend the ES. However, if the ExA or Secretary of State considers that the ES thresholds should be differed, the assessment has nonetheless been provided and there is no difference to the ultimate assessment of effects. The levels of effect have not been considered to carry more than limited weight in other consented solar NSIPs.	Not agreed

		ISEP Assessment Approach" dated October 2026 (Applicants note: this has been appended to this document at Appendix 1). However, we maintain that the assessment of effects on agricultural land and soils should follow the sensitivity and magnitude criteria set out in tables 2 and 3 the ISEP guidance. This guidance provides the established industry-standard methodology and ensures a consistent, transparent and comparable assessment of effects across developments. Natural England considers that both the assessment methodology and the resulting significance conclusions should be updated to accord with the sensitivity and magnitude criteria presented within the ISEP guidance.		
1-1(5)	ALC Data	**Provisional Agricultural Land Classification (ALC) mapping for site selection** In relation to site selection, Natural England notes the Applicant's explanation that provisional ALC mapping and BMV likelihood mapping represented the best available information at the time and acknowledges that the newer predictive ALC mapping was not	**Reliance Upon Provisional ALC Maps**. In [**RR-038**] NE comment at NE8 that provisional ALC plans do not identify if land is of BMV quality or not. The limitations of the (then) published provisional ALC maps, and the Likelihood of BMV maps, is clearly recognised. Short of detailed ALC, it was, however, the best data available, and NE had digitised it so it was clearly intended to be used. The Site can be seen as the lowest quality available, Grades 3 and 4, and with a low likelihood of BMV, unlike much of Norfolk.	Agreed

		available when the site selection exercise was undertaken.	Plate 11-23 Provisional ALC, Site circled approx.  Plate 11-24 Likelihood of BMV, Site circled approx.  Comment NE8 in [**RR-038**] goes on to set out the limitations of provisional ALC mapping, advising that the results of a detailed ALC survey would provide soils data. This comment is not disputed. It is believed that these comments in the Relevant Representations have fed into the concerns raised in the SoCG. Given that detailed ALC survey and soil survey was fully reported in the ES, the Applicant considers that this item should be capable of being agreed.	
1-1(6)	ALC Coverage	**Areas not subject to detailed ALC survey** Natural England has noted the Applicant's clarification regarding the	**Is ALC Coverage Incomplete?** There is coverage of all of the Order Limits except for two areas, identified below.	Agreed

		limited extent of land not subject to detailed ALC survey and understands that these areas are associated with Grid Connection Infrastructure works where no soil stripping or excavation is proposed. If any soil stripping is to occur, an ALC will need to be undertaken in these locations to inform restoration criteria and soil management; and described in the detailed SMP.	 The Works Plans [**APP-009**] identify the works across most of these areas as Work No 5c, which is temporary work areas and realignment of the overhead line. For a small part of the eastern area Works No 5a, which could include a new pylon, applies. Therefore, due to the minor quantity of permanent land take in these areas, no potential significant adverse effects are likely, and as mostly the works are above ground, ALC of those areas was not, and still is not, considered necessary. The works in this area will be covered in the SMP, to be secured by DCO Requirement. The Applicant considers that this item can be agreed.	
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	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000202-6.4_ES_Appendix 11.2 Agricultural Land Classification.pdf Response 1-2 raises two matters:	Agreed

		per hectare. If any soil stripping is to occur, an ALC survey will need to be undertaken in any unsurveyed locations to inform restoration criteria and soil management; and described in the detailed SMP.	(ii) coverage in the ALC; (ii) application of data within the assessment. **Coverage of the ALC**. The ALC is complete for all of the Order Limits except for two areas identified in 1-1, which are mostly included to allow for restringing of electric cables, which is an above-ground activity. A repositioned pylon may be included in Works Area 5A, but the effect will be negligible due to the small scale of any permanent land take. These works can and will be included in a detailed SMP, which can be provided pre-construction under a DCO Requirement. **Application of Data Within the Assessment**. Response NE10 in the RRs **[RR-038]** included the following comments, which may be those underpinning this comment: "For a robust and transparent assessment it is recommended that: (i) the sensitivity of soils be clearly identified using ALC and soil function frameworks, (ii) temporary and permanent impacts be assessed separately, (iii) the spatial extent of impacts be reviewed to ensure all affected areas are included, and (iv) mitigation and monitoring measures are fully specified within the final Soil Management Plan to support a defensible evaluation of significance". These are all covered in ES Chapter 11 [**AS-018**] which sets out:	~~Low providing Natural England advice is followed~~

(ii) the sensitivity of soils, using the ISEP Guide and based on detailed ALC and soil survey results;

(ii) a detailed assessment over many pages of each and every construction work, identifying temporary and permanent effects separately;

(ii) the assessment considers the extent of the areas affected by ALC grade. These are all set out in Table 11-7, reproduced for ease below

Table 11-7 Areas Disturbed by ALC Grade

Component	ALC Grade					
	1	2	3a	3b	4	Total
Short-term temporary						
Construction compounds (locations known)	0	1.0	0	1.0	0	2.0
Construction compounds (locations not known)	Worst case 9.1 BMV					9.1
Total	10.1ha BMV, 1.0ha non-BMV					
Long-term temporary						
Access tracks	0.3	1.9	1.6	0.8	0	4.6
Ground-mounted PV modules	<0.1	0.5	0.3	0.5	<0.1	1.4
Vehicle trafficking	0	0	0	0	0	0
Cabling	0	0	0	0	0	0
Customer Substation and BESS (Field 27)	0	9.2	5.2	2.8	0	17.2
BESS (Field 24)	0	0	0	10.5	0	10.5
Total	19.1ha BMV, 14.7ha non-BMV					
Permanent						
NG Substation	0	4.5	0	0	0	4.5
Mitigation planting	0	1.8	2.5	0	0	4.3
Total	8.8ha BMV					

(iv) mitigation and monitoring measures are set out in the ES Chapter 11, not the SMP, to enable an assessment of significance.

			The oSMP sets out the framework for a detailed SMP, which will provide the information to ensure that soils and land quality are not adversely affected, and which can be controlled by DCO Requirement. The final SMP will not, however, set out a defensible evaluation of significance, as this is a matter for the ES, not the SMP. The Applicant considers that this matter can be agreed.	
1-3	Siting of permanent infrastructure	We note the Applicant's position is that operational and environmental considerations have been considered in their assessment of the siting of permanent infrastructure. However, 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. Currently permanent infrastructure is still to be sited on BMV land, therefore we still consider this to be a matter that is not agreed. ~~an amber issue.~~	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. There is agreement that this is a matter for the planning balance in the Secretary of State's determination of the DCO. The Applicant has sought to minimise the effects on BMV land, but the loss required for this infrastructure was (on	~~Under Discussion~~ ~~Low providing Natural England advice is followed~~ Not agreed

			balance) necessary for other reasons, as explained.	

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)

		With consideration of air emissions potentially impacting the River Nar SSSI, we refer you to Appendix 1 of this letter - *Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs)*. 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. <u>Potter & Scarning Fens, East Dereham SSSI</u> 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 - *Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs).*		

		No potential likely significant effects on other National Designated Sites have been identified.		
2-1	Protected Species	Natural England noted previously 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 had been provided that a licence has been/will be applied for. https://www.gov.uk/guidance/wildlife-licences Subsequently, Natural England's licensing team has reviewed the submitted Badger survey information and confirmed that the survey had been undertaken to an appropriate standard. On the basis that the known Badger setts would be retained and protected through appropriate buffer zones, Natural England agree that no Badger licence is currently required and that there is no need for the Applicant to seek a Letter of No Impediment (LONI) at this stage. Natural England agrees that an updated pre-construction walkover survey should be undertaken prior to commencement of works and that, should new setts arise in locations requiring licensable action, the Applicant should apply for a licence at that stage. On this basis, Natural England is satisfied that no badger licensing	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. 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. No requirement for protected species licences in relation to other species has been	Agreed ~~Low – providing Natural England advice is followed and should any new Badger sett or setts be created within relevant areas in the future, licensing is applied for at that stage if required~~

		requirements have been identified at the current time.	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. 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.	
2-2	Biodiversity Net Gain (BNG)	Natural England welcomes the demonstration of >10% net gains for biodiversity using the Defra Biodiversity Metric, and would welcome the specific BNG uplift identified in [APP/7.4.1]being secured in the DCO. Natural England noted that the assessment states that there are no watercourses within the order limits, however, it was Natural England's understanding that there are drainage ditches within the development boundary. We therefore recommended that these are considered within the BNG assessment and 10% uplift is also delivered for these habitats. Natural England advised that the Local Nature Recovery Strategies (LNRS), a new mandatory system of spatial strategies for nature established by the Environment	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. 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. 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	Agreed ~~Low – providing Natural England advice is followed~~

		Act 2021, could provide 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 advised that habitats and species measures within the Landscape and Ecology Management Plan (LEMP) and BNG delivery, should be aligned with the published Norfolk LNRS. Natural England advised 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. Having reviewed the further information provided [APP-061] in relation to the drainage features present on site, Natural England agrees that these features do not meet the Biodiversity Metric definition of a ditch, as they are not considered likely to retain water for more than four months of the year, and can therefore be excluded from the BNG assessment.	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. 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]**.	

2-3	Ancient woodland and ancient/veteran trees	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.	The buffers and mitigation measures are in accordance with the Standing Advice produced by Natural England and the Forestry Commission. These measures will be detailed further within the LEMP and CEMP, as requested, and secured as avia the corresponding requirements of the DCO. As such, all matters are considered to be agreed in relation to Ancient Woodland, ancient and veteran trees.	Agreed
2-4	Outline Landscape and Ecological Management Plan (oLEMP) – Norfolk LNRS (7.2.3.-7.2.19)	Natural England welcomes the outline Landscape and Ecological Management Plan (oLEMP). We previously advised that the document could be strengthened. Natural England identified the need to - 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	The **oLEMP [APP/7.11.2]** 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. Clarification of success criteria, remedial actions and responsibilities for ongoing management are set out within the updated **oLEMP [APP/7.11.2]** at section 7.5. Hydrological features are discussed above at 2-2. 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	Agreed ~~Low – previding Natural England advice is followed~~

		pressure on sensitive habitats are appropriately considered and managed. Having reviewed the further information provided [APP/7.11.1] (noting we are unable to locate document APP/7.11.2, which you have referred to), we are satisfied these revisions have been made. Natural England welcomes the positive commitments within the oLEMP — including significant BNG uplift, grassland creation, woodland and hedgerow establishment, and species mitigation and previously advised that additional detail is needed on seed provenance, nesting-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. We are satisfied that this information has now been provided. As per our advice 525376, dated 19 September 2025, we advised if you could clarify the exact species of curlew being referred to e.g. Numenius Arquata (Eurasian curlew), or Burhinus oedicnemus (stone-curlew). Natural England now understands the curlew species in question is Eurasian curlew,	Requirements 7 and 9 in Schedule 2 to the **Draft DCO [APP/3.1.1]**. Recreational pressure will be limited to existing and proposed Public Rights of Way (PRoWs). These areas do not comprise sensitive habitats being either already used as amenity areas or proposed for amenity areas. As such, increases in recreational pressure are not anticipated to have an impact on sensitive habitats within the Site. Grassland seed provenance is discussed at 7.2.42 within the oLEMP, whilst provenance of proposed tree and hedgerow species/specimens is covered at 7.3.16, 7.3.41 and 7.4.13 within the oLEMP. Nesting-season restrictions are provided within the oLEMP at 7.3.18, 7.3.49, 7.3.72., 7.4.21, 7.4.50, and Annex A. Eurasian curlew and Skylark mitigation is detailed within the oLEMP at 7.3.103 - 7.3.112. Reference to a bat-sensitive lighting scheme, which will included within the detailed CEMP, is included within the oLEMP at 7.3.129. We can confirm the species being referred to (in all cases where the more generic “Curlew” was previously used), is Eurasian Curlew *Numenius Arquata*. Where possible, existing submissions have been updated to specify Eurasian Curlew for clarity, and future	

		and that this has been updated in existing submissions where possible, and Eurasian Curlew, or Stone Curlew will be referred to in any future submissions for clarity.	references throughout will refer to the term Eurasian Curlew (or Stone-curlew as appropriate), for clarity.	

5 Signatories

5.1 Overview

5.1.0 The above SoCG is agreed between The Droves Solar Farm Limited (the Applicant) and Natural 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 Natural England.

Name:	
Job Title:	
Date:	
Signature:	

Appendix 1: Farm Impacts Note

THE DROVES SOLAR FARM

EN0110013

ASSESSMENT OF AGRICULTURAL EFFECTS:

ISEP ASSESSMENT APPROACH

October 2026

1 Introduction

1.1 Natural England's position is that the development should be assessed against the criteria set out in the Institute of Sustainability and Environmental Professionals (ISEP) Guide "A New Perspective on Land and Soil in Environmental Impact Assessment" (February 2022).

1.2 This document sets out that assessment, and compares the effects identified against the effects identified in the ES Chapter 11 [**AS-080**] in respect of the effects on agricultural land quality.

1.3 This document:

(i) sets out the comparable assessment tables;

(ii) summarises the impacts to be assessed;

(iii) compares the results of the two assessments;

(iv) and ends with some commentary regarding the implications.

2 Comparable Assessment Tables

2.1 Table A below compares the sensitivity descriptions from the ES Chapter 11 table 11-1 and Table 2 from the ISEP Guide.

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Directors - [redacted]
Consultant - [redacted]

Table A: Comparison of Sensitivity

Receptor Sensitivity	Table 11-1 of the ES	Table 2 of the ISEP Guide
Very high	-	ALC Grades 1 and 2
High	ALC Grades 1, 2 and 3a	ALC Grade 3a
Medium	ALC Grade 3b	ALC Grade 3b
Low	ALC Grades 4 and 5	ALC Grades 4 and 5
Negligible	Land with only indirect links	Land with only indirect links

2.2 Table B compares the magnitude of impacts from the ES and the ISEP Guide.

Table B: Comparison of Magnitude

Magnitude of Impact	Table 11-2 of the ES	Table 3 of the ISEP Guide
High (major)	Loss or downgrading of >50 ha	Loss or downgrading of >20 ha
Medium (moderate)	Loss or downgrading of 20 – 50 ha	Loss or downgrading of 5 – 20 ha
Low (minor)	Loss or downgrading of <20 ha	Loss or downgrading of <5 ha
Negligible	No discernible loss	No discernible loss

2.3 It is not possible to combine into one table the two matrices. The two are compared below. Table 11-3 of the ES has been amended, for the purposes of comparison, with high placed at the right hand end, not left hand end as in the ES, to aid comparison with the ISEP table.

Table C: Matrix for ES Assessment

Magnitude	Sensitivity			
	Negligible	Low	Medium	High
High	Negligible	Minor	Moderate	Major
Medium	Negligible	Minor	Minor	Moderate
Low	Negligible	Minor	Minor	Minor
Negligible	Negligible	Negligible	Negligible	Negligible

2.4 The table from ISEP Table 5 is reproduced below.

Table D: Table 5 from the ISEP Guide

		Nature of impact (magnitude/probability/reversibility)				
		No Change	Negligible	Minor	Moderate	Major
Nature of Receptor (sensitivity/ value/ importance)	Very high	Neutral	Slight	Moderate or large	Large or very large	Very large
	High	Neutral	Slight	Slight or moderate	Moderate or large	Large or very large
	Medium	Neutral	Neutral or slight	Slight	Moderate	Moderate or large
	Low	Neutral	Neutral or slight	Neutral or slight	Slight	Slight or moderate
	Negligible	Neutral	Slight	Neutral or slight	Neutral or slight	Slight

3 Impacts To Be Assessed

3.1 Taking the long-term temporary and permanent impacts set out in Table 11-7 of the ES, the quantums of land by ALC grade are summarised below.

Table E: Areas in Ha by ALC Grade

Duration	**ALC Grade**					
	1	**2**	**3a**	**3b**	**4**	**5**
Long term	0.4	11.6	7.1	14.6	0.1	0
Permanent	0	6.3	2.5	0	0	0
Total	**0.4**	**17.9**	**9.6**	**14.6**	**0.1**	**0**

3.2 This table does not include short-term construction compound impacts, which are short-term and reversible. Those effects are, worst case, 9.1 ha of BMV (quality not known).

4 Effects Determined by Both Methodologies

4.1 Under the ES Chapter 11 the effect, as set out in 11.8.53 on a worst-case assessment approach, is:

- loss of 27.9 ha of BMV;
- this is a medium magnitude impact on a high sensitivity receptor;
- this is a moderate adverse effect, which is significant.

4.2 Under the ISEP Guide, the loss of ALC Grades 1 and 2 would be assessed as follows:

- loss of 18.3 ha Grades 1 and 2;
- this is a moderate magnitude impact on a resource of very high sensitivity;
- this is a large or very large effect, which is significant.

4.3 Under the ISEP Guide, the loss of ALC Grade 3a would be assessed as follows:

- loss of 9.6 ha of Grade 3a;
- this is moderate magnitude impact on a high sensitivity resource;
- this is a moderate or large magnitude effect, which is significant.

4.4 If it is assumed that the areas that are to be returned to agricultural use on decommissioning are temporary and reversible, the resultant effect is compared as follows, for the permanent areas affected.

4.5 The ES Chapter 11 at 11.10.3 assesses that the permanent loss of 8.8 ha of BMV (including 4.3 ha of woodland) would be a low magnitude impact on a resource of high sensitivity, resulting in a minor adverse effect, which is not significant.

4.6 Under the ISEP methodology, this loss would be significant, because it includes 6.3 ha of Grade 2, which would be a moderate magnitude loss on a resource of very high sensitivity, which would result in a large or very large effect, which would be significant.

4.7 In respect of the temporary and reversible use of 9.1 ha of BMV land for construction compounds, being reversible the magnitude of impact is low (minor). The temporary (low or minor impact) use of land of ALC Grades 1 or 2 would be, under the ISEP Guide, a Moderate or Large effect, which can be significant. The ISEP Guide table 6 identifies that moderate effects can be considered material in the decision making process.

4.8 Under the tables used in the ES, the effect would be a low magnitude impact on a resource of high sensitivity, which would be minor adverse, which is not significant.

5 **Commentary**

5.1 The outcome of the splitting ALC Grades 1 and 2 from ALC Grade 3a, in this case, does not effect the overall assessment of effect on a worst-case assessment, where it is assumed that all long-term disturbed land is not restored to the original ALC grade.

5.2 There is a change in respect of the permanent effect if the long-term areas are assumed to be restored. Under the ES, the permanent loss of 8.8 ha of BMV is a minor, not significant effect. Under the ISEP Guide, the permanent loss of 6.3 ha of Grade 2 for permanent works and tree planting is a large or very large effect, which is significant.

5.3 Under the ISEP Guide short term reversible effects (assuming full reversibility) from construction compounds are a significant adverse effect, whereas in the ES Chapter 11 they are not significant.

5.4 This comparison is presented to Natural England to aid determination by the ExA. The loss of less than 20 ha of BMV is not a matter on which Natural England would comment, as confirmed in Natural England Operational Statement (1 October 2026).

5.5 Natural England is invited to agree that agricultural effects of The Droves Solar Farm have been realistically assessed, or to otherwise advise that in this case the permanent loss of 6.3 ha of Grade 2 should be considered as a significant adverse environmental effect.

Appendix 2: Explanation regarding assessment tables and the ISEP Guide

THE DROVES SOLAR FARM

EN0110013

EXPLANATION REGARDING ASSESSMENT

TABLES AND THE ISEP GUIDE

August 2026

1 Introduction

1.1 Natural England has asked for an explanation of the methodology used in Chapter 11 of the Environmental Statement for The Droves Solar Farm.

1.2 The request is in connection with two matters:

(i) the thresholds used for determining magnitude of loss of agricultural land and soil resources;

(ii) the treatment of the effect of temporary losses of agricultural land and soils.

2 ISEP Guide and Thresholds

2.1 The methodology used in the ES varies from the ISEP Guide in two key areas:

(i) all BMV land (Grades 1, 2 and 3a) is classified as “high” sensitivity. The ISEP Guide places Grades 1 and 2 as “very high” sensitivity;

(ii) the magnitude threshold used are <20 ha, 20-50 ha and >50 ha. ISEP uses <5 ha, 5-20 ha and >20 ha.

2.2 **Principles of Environmental Assessment.** The purpose of the EIA is to identify clearly any and all potential impacts and potential mitigation, and to provide an objective assessment of the effects. The stated effects must be realistic.

2.3 The ISEP Guide is only a guide. It is not a mandatory tool. The ISEP Guide provides guidance in undertaking the assessment of impacts on agricultural land and soil. However it is not a mandatory tool that cannot be adapted with the use of professional judgement.

2.4 It is the professional judgement of the technical lead that the ISEP Guide, if followed exactly, results in a significant overstating of the severity of an effect, resulting in an unrealistic conclusion.

2.5 The ISEP Guide, as structured, sets Grades 1 and 2 as "very high" sensitivity and magnitude thresholds set at 5 ha and 20 ha. Using these thresholds, the loss of 0.2 ha of Grade 2 (purely as an illustrative example) would be a minor magnitude impact (<5 ha) on a very high sensitivity receptor (Grades 1 and 2), resulting in a "**moderate or large effect**".

2.6 In ES terms a moderate or large effect is significant. For the loss of 0.2 ha of Grade 2, this does not seem a realistic conclusion. In the opinion of the technical lead, significant effects should not be concluded at levels as low as 1% of the threshold for consultation with Natural England. A logical trigger for what is or is not significant in EIA terms should not be triggered by very small losses.

2.7 In our opinion, it is proportionate to consider that only losses of >20 ha of BMV should be recorded as significant. As a steer, whilst the "Guide to assessing development proposals on agricultural land" (Natural England, February 2021) does not define a threshold, it does provide some guidance. This adds to our view that 20 ha is a reasonable threshold for defining what is significant development:

- paragraph 6 states **"you should take account of smaller losses (under 20 ha) if they are significant when making your decision"**, which suggests that losses of under 20 ha would not be significant unless there are particular local circumstances. What those particular local circumstances are, is not defined but it would be reasonable to consider that the loss of 20 ha may be significant in an area where BMV land is rare, for example, which is not the case in Norfolk; and
- Paragraph 7.1 states that you can use Natural England's chargeable discretionary advice system "**if your proposal is large, for example 20 ha or more, and requires more detailed advice**". The definition of large as being more than 20 ha suggests that a site under 20 ha is considered small, and hence, not significant.

2.8 Accordingly we have applied professional judgement to the sensitivity and magnitude criteria in the assessment tables.

2.9 **Sensitivity.** The 2026 publication of the Predictive Agricultural Land Classification Map for England (Defra, 2026) and the publication of the related research report, identifies that it is predicted that 4.4% of agricultural land will be Grade 1, and 19.0% will be Grade 2, a collective total of 23.4%. The Utilised Agricultural Area of England is about 8.8 million ha,

so an estimated 2.06 million ha will be Grades 1 and 2. A further 27.5%, or 2.42 million ha, will be subgrade 3a. These resources are not rare or scarce in percentage or area measurements.

2.10 Very few EIA matrices have a "very high" sensitivity category, and it seems appropriate to combine all BMV land, which is all given the same policy coverage, into a single high category.

2.11 **Magnitude.** The assessment also varies from the ISEP Guide in respect of magnitude used in the assessment. The threshold for consultation with Natural England regarding the loss or potential loss of land of BMV quality is 20 ha. It seems logical that the loss of 20 ha of BMV would therefore be a significant environmental effect, and recorded as such. As moderate adverse effects are significant in Environmental Assessment terms, the tables should ensure that the loss of 20 ha of BMV is a moderate adverse effect.

2.12 Therefore the thresholds in Table 2-7 vary from those used in the ISEP Guide. The result is that the loss of 20 ha or more of land of BMV quality will be treated as a moderate adverse effect, which is significant in EIA terms.

2.13 For these reasons we have adopted the thresholds used.

3 Treatment of Temporary Impacts

3.1 Temporary works that are to be restored may or may not have long term effects, and it is important that the ES recognises and assesses this.

3.2 The assessment must be careful to distinguish between temporary works and temporary effects on soils or land quality. It should not be assumed that a temporary work will not affect land quality or soil-related features. As noted in the ISEP Guide at the footnote to Table 3, "**temporary developments can result in a permanent impact if resulting disturbance or land use change causes permanent damage to soils**".

3.3 Therefore where temporary works are restorable back to the same ALC grade or do not result in permanent impacts on soils, they are a "temporary, reversible loss of soil-related features" and a low magnitude impact.

3.4 If those temporary works result in a permanent impact on soils or land quality, for example because they cannot be restored back to the original ALC grade, this will be a permanent loss and considered in the assessment accordingly.

THE DROVES

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