



East Pye Solar
Statement of Common Ground: Natural England

Revision 1
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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	2
2	Scheme Description	3
3	Current Position between the Applicant and Natural England.....	4
3.1	Matters of Discussion	4
3.2	Draft Development Consent Order.....	5
3.3	Landscape and Visual	6
3.4	Ecology and Biodiversity	7
3.5	Soils and Agriculture.....	13
4	Signatories	18

Tables

Table 1.1: Topic Referencing	2
Table 1.2: Status of Matters	2
Table 3.1: Draft Development Consent Order.....	5
Table 3.2: Landscape and Visual	6
Table 3.3: Ecology and Biodiversity	7
Table 3.4: Soils and Agriculture	13

Appendices

Appendix A Record of Engagement

1 Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the application for a Development Consent Order (DCO) (the Application) for East Pye Solar (the Scheme) made by East Pye Solar Limited (the Applicant) to the Secretary of State for Energy Security and Net Zero (SoS) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available within the Application documents available on the Planning Inspectorate's website ([Documents | East Pye Solar](#)).
- 1.1.3 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

- 1.2.1 This SoCG has been prepared by the Applicant and Natural England (NE). Collectively, the Applicant and NE are referred to as the parties.

1.3 Purpose of this Document

- 1.3.1 The SoCG covers topics of the Application within the remit and of relevance to NE.
- 1.3.2 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 parties to enable a final version to be submitted to the ExA.
- 1.3.3 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. For the purposes of Examination, this SoCG addresses key topic areas set out in **Table 1.1**. Each area of the topic has a unique reference which relate to the topic matter.

Table 1.1: Topic Referencing

Topic	Reference
Landscape and Visual	NE LV
Ecology and Biodiversity	NE EB
Soils and Agriculture	NE SA

1.4 Terminology

- 1.4.1 This SoCG summarises the main topics covered and the status of the matter, as outlined in **Table 1.2**.

Table 1.2: Status of Matters

Colour Code	Status
	Agreed – indicates where an issue has been resolved.
	Under Discussion – indicates where points continue to be the subject of on-going 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 Scheme Description

- 2.1.1 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 with a total capacity exceeding 100 megawatts (MW) and associated development including a Battery Energy Storage System (BESS), up to three 132kV Project Substations and up to three 400kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation.
- 2.1.2 The **Location Plan [APP-005]** shows the Order Limits for the Scheme, which is 1,212.3 hectares of land within South Norfolk (the 'Order Limits').

3 Current Position between the Applicant and Natural England

3.1 Matters of Discussion

- 3.1.1 The following tables set out the position of the parties by topics, identifying matters agreed, under discussion, or not agreed between the Applicant and NE at the point of this document being published.

3.2 Draft Development Consent Order

Table 3.1: Draft Development Consent Order

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant’s Position	Status
NE DCO - 1	Draft Development Consent Order	Draft DCO [AS-032]	NE has reviewed the Draft DCO as part of our Relevant Representations response and provided comments on proposed amendments. We will review the revised version of the Draft DCO as part of our Written Representations response.	The Applicant has responded to Natural England’s comments made in its Relevant Representation. The Applicant will continue to engage with NE in respect of any future revisions to the Draft DCO and will respond to any comments made in its Written Representation.	Under discussion

3.3 Landscape and Visual

Table 3.2: Landscape and Visual

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NE LV - 1	Scope Landscape Character Assessments	ES Volume 1, Chapter 7 - Landscape and Visual [APP- 043] ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119] ES Volume 2, Figure 7.2 - Landscape Character Plan [APP-067]	NE's position is that the proposed Scheme is not located within, or within the setting of, any nationally designated landscapes (National Parks or National Landscapes). As a result, Natural England have no specific comments to make on the further landscape implications of this proposal. No further detailed comments are given.	The published landscape character assessments that are relied upon at the national, and local level and set out within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] , ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119] and ES Volume 2: Figure 7.2 - Landscape Character Plan [APP-067] , are considered acceptable to inform the assessment baseline conditions.	Agreed
NE LV - 2	Green Infrastructure Strategy	ES Volume 1, Chapter 7 - Landscape and Visual [APP- 043] Outline Landscape and Ecology Management Plan [APP-199], Green Infrastructure Strategy [AS-005]	NE supports the landscape planting proposed at the PEIR stage, especially to provide connectivity between SSSIs.	The approach and proposals for embedded mitigation set out within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] , considers the landscape and visual matters associated with the Scheme as part of an iterative process. The updated Outline Landscape and Ecology Management Plan [LEMP] [APP-199] since PEIR has increased buffers from some existing features, with a minimum 15 m buffer away from trees in line with Natural England guidance and a minimum 30m offset from ancient woodland following the comment. It is assumed that the consultee will agree that the embedded mitigation is appropriate. Embedded mitigation measures include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation, alongside the incorporation of landscape proposals designed to integrate the Scheme into the surrounding context. These measures have been taken into account within the LVIA. The Applicant considers that this embedded mitigation, secured through the Outline LEMP [APP-199] , forms a fundamental part of the Scheme.	Agreed

3.4 Ecology and Biodiversity

Table 3.3: Ecology and Biodiversity

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NE EB - 1	International Designated Sites NE key issue ref - NE1	Shadow Habitat Regulations Assessment [sHRA] Report [APP 220] Section 8.9 of ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] ES Volume 1, Chapter 9 - Water Environment [APP-045]	NE has no amber or red issues identified for internationally designated sites and that the Shadow Habitat Regulations Assessment [sHRA] Report [APP 220] has screened out water quality, air quality, and avian impacts to Norfolk Valley Fens Special Area of Conservation [SAC], The Broads SAC, Broadland Special Protection Area [SPA], and Broadland Ramsar due to distance, lack of hydrological connectivity and optimal habitat.	The Screening Assessment within Shadow Habitat Regulations Assessment [sHRA] Report [APP-220] found no mechanism for impacts to internationally designated sites and the sHRA did not proceed to the Appropriate Assessment Stage. The hydrological connectivity to Internationally designated sites is detailed in ES Volume 1, Chapter 9 - Water Environment [APP-045] . The Applicant considers that embedded mitigation presented in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] and secured through Outline CEMP [APP-196] , forms a fundamental part of the Project and will protect both International and National designated sites but also those with a non-statutory designation (e.g. County Wildlife Sites, Roadside Nature Reserves) as well as Ancient woodland and Priority habitats. These include offsets from sensitive habitats, appropriate storage of materials, the appointment of an Ecological Clerk of Works (ECoW), dust mitigation measures and the adoption of trenchless construction techniques under watercourses as per the Outline Cable Route Construction Statement [APP-216] . It is assumed that the Consultee will agree that the methods proposed to protect all sites is appropriate, in keeping with best practice and can be secured through the consenting documents.	Agreed
NE EB - 2	Nationally Designated Sites NE key issue ref – NE2	ES Volume 1, Chapter 8 Ecology and Biodiversity [APP-044] ES Volume 1, Chapter 9 - Water Environment [APP-045]	NE has no amber or red issues identified for nationally designated sites. The Environmental Statement [Document Reference: APP/6.3.9.1, Volume 3, Appendix 9.1, Flood Risk Assessment & Outline Surface Water Drainage Strategy Revision 2 April 2026, page 32], lists in table 6.1 designated sites that are hydrologically linked to the Order Limits via watercourses and groundwater flow, have a high sensitivity and therefore have potential to be impacted by the Scheme. These include: • Fritton Common SSSI • Pulham Market Big Wood SSSI • Shotesham-Woodton Hornbeam Woods SSSI	The Applicant acknowledges that Natural England has no red or amber issues for nationally designated Sites and agrees with the conclusions of ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] . These sites, including other non-statutory sites and irreplaceable habitats, have been assessed in paragraphs 8.9.18 and 8.9.157 of ES Chapter 8. Embedded mitigation set out in Section 9.7 of ES Volume 1, Chapter 9 - Water Environment [APP-045] will protect these nationally designated Sites for all phases of the Project. The Applicant considers that embedded mitigation presented in ES Volume 1, Chapter 8 - Ecology	Agreed

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			• Shotesham Common SSS • Hedenham Wood SSSI • Tindall Wood Ditchingham SSSI Two Ancient Woodlands are also hydrologically linked: • Saxlingham Grove Ancient Woodland • Popes Wood and Doylys Grove Ancient Woodland. NE also acknowledge the embedded mitigation measures set out in the Outline Construction Environmental Management Plan [CEMP] [APP-196], which include measures such as avoidance areas, storage of materials and preparation of a Surface Water Drainage Strategy is implemented and secured as outlined in our Relevant Representations.	and Biodiversity [APP-044] and secured through Outline CEMP [APP-196], forms a fundamental part of the Project and will protect both International and National designated sites but also those with a non-statutory designation (e.g. County Wildlife Sites, Roadside Nature Reserves) as well as Ancient woodland and Priority habitats. These include offsets from sensitive habitats, appropriate storage of materials, the appointment of an Ecological Clerk of Works (ECOW), dust mitigation measures and the adoption of trenchless construction techniques under watercourses as per the Outline Cable Route Construction Statement [APP-216]. It is assumed that the Consultee will agree that the methods proposed to protect all sites is appropriate, in keeping with best practice and can be secured through the consenting documents	
NE EB - 3	Nationally Designated Sites	Section 8.9 of ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] ES Volume 1, Chapter 9 - Water Environment [APP-045]	Mitigation measures have been outlined in the Environmental Statement Volume 1: Chapter 9 Water Environment – Revision 1 [Document Reference: APP/6.1.9 March 2026 pages 34-39] and the Outline Construction Environmental Management Plan – Revision 1 [Document Reference: APP/7.1 March 2026, Table 3.4]. These include measures such as avoidance areas, storage of materials and preparation of a Surface Water Drainage Strategy. Natural England welcomes these measures and advises that these are secured. Provided that the mitigation measures for air and water quality which have been included in the outline CEMP [Document Reference: APP/7.1 Revision 1, March 2026] are followed and secured, National England agrees that impact to the designated sites above can be ruled out.	The Applicant acknowledges that Natural England agrees with the conclusions of ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] and ES Volume 1, Chapter 9 - Water Environment [APP-045]. The Applicant further confirms that safeguards provided in the Outline CEMP [APP-196], which will be implemented by a detailed CEMP and secured through the Draft DCO [AS-032] will avoid impacts to nationally designated Sites during construction.	Agreed
NE EB - 4	Protected Species NE3	ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]	NE has commented on the application process for protected species licences and have reminded the Applicant to refer to Natural England's guidance Wildlife licences: when you need to apply (Natural England and Defra, 25 October 2023, Available at: https://www.gov.uk/guidance/wildlife-licences) to determine if a mitigation licence is required. Natural England note the Applicant's current position that they don't currently consider there to be a	The Applicant can confirm that no protected species licence application is currently considered to be required. The embedded design principles adopted and detailed within Design Principles, Parameters and Commitments [APP-213] and ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059], include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-	Agreed

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			requirement for protected species licences. Should the project design change or should any pre-commencement works change the ecological baseline, we advise engaging with the Natural England licencing team at the earliest opportunity to prevent delay	scale biodiversity enhancements; with significant habitat gains for the benefit of protected species. Outline measures detailed within ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] provide mitigation to avoid impacts upon protected species, which among other measures, include for pre-commencement surveys to confirm that the existing ecological baseline remains. The document also provides an approach to determining licensing requirements including pre-works inspections of trees, the appointment of an Ecological Clerk of Works (ECoW) to advise the Site manager on an appropriate method of work, consideration of EPSL or CL31Class Licences (e.g. water vole) and/or the appointment of a licensed consultant registered under Badger Class License WML-CL35. Should design changes lead to impacts for which protected species licences might be required, then NE would be consulted with following a review of Natural England's guidance 'Wildlife licences: when you need to apply (Natural England and DEFRA, 2023)'. It is noted that the Applicant can rely on NE's Discretionary Advice Service (DAS) to apply for a draft licence and seek a Letter of No Impediment (LONI) as appropriate. It is therefore assumed that the consultee is satisfied that the Applicants approach to confirming the need for a licence and the safeguards included within ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] and secured by the Outline Construction and Environmental Management Plan [APP-196] are appropriate.	
NE EB - 5	Biodiversity Net Gain Targets	Outline LEMP [APP-199] Biodiversity Net Gain Report [APP-218] Biodiversity Net Gain Statutory Metric [APP-219]	NE welcomes the demonstration of biodiversity net gain in excess of 10% using the Defra Biodiversity Metric and supports the Scheme's alignment with the Norfolk LNRS. Natural England would welcome a commitment to delivering more than 10% BNG and has provided advice on opportunities to further strengthen alignment with the LNRS.	The Applicant acknowledges that Natural England is seeking a commitment to deliver more than 10% BNG. A minimum of 10% BNG in habitat units, a minimum of 10% BNG in hedgerow units and a minimum of 10% BNG in watercourse units is secured by Requirement 9 of the Draft DCO [AS-032]. The biodiversity gain hierarchy has been applied to the Scheme and the BNG assessment, as set out in the Biodiversity Net Gain Report [APP-218]. The Biodiversity Net Gain Report [APP-218] and	Agreed

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				Biodiversity Net Gain Statutory Metric [APP-219] demonstrate that the Scheme has the capacity to deliver more than 10% gains for habitats, hedgerows and watercourses whilst complying with the DEFRA Metrics' Trading Rules. Although NSIPS are not mandated to deliver a 10% BNG uplift, it is assumed that the Consultee agrees that the Applicants commitment to deliver biodiversity enhancement in accordance with NPS EN-1.	
NE EB - 6	Biodiversity Net Gain Local Nature Recovery Strategy	Biodiversity Net Gain Report [APP-218] Biodiversity Net Gain Statutory Metric [APP-219] ES Volume 1, Chapter 8 - Biodiversity and Ecology [APP-044]	NE has requested that the Applicant provides more clarification on where the Norfolk Local Nature Recovery Strategy [LNRS] has been considered in supporting documents, in particular Chapter 8 Biodiversity and Ecology [APP-044] and in the Biodiversity Net Gain Report [APP-218]. NE advise strengthening alignment with the final LNRS and providing clear success criteria, remedial triggers and long-term management responsibilities to ensure effective delivery of biodiversity and nature recovery outcomes.	The Applicant acknowledges Natural England's position that the ambition of the Norfolk Local Nature Recovery Strategy (LNRS) could be more explicit in Section 8.9 of ES Volume 1, Chapter 8 - Biodiversity and Ecology [APP-044]. Whilst the Schemes design evolution has progressed prior to the publication of the LNRS on 31st October 2025, the embedded design principles adopted and detailed within Design Principles, Parameters and Commitments [APP-213] have been applied to retain, protect and enhance ecological assets. Where possible, areas of land located within the Order Limits designated as 'areas that could become of particular importance' (ACB) within the LNRS Local Habitat Map have been targeted with their suggested habitat type when developing the ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. Areas of ACB that have been prescribed their suggested habitats within the Green Infrastructure Strategy [AS-005] are identified within the Biodiversity Net Gain Statutory Metric [APP-219] on the A-2 On-Site Habitat Creation tab under the strategic significance. These LNRS ACB habitats are set to high strategic significance: 'formally identified in local strategy' within the metric. This not only contributes towards a quantifiable BNG, but also to helps to strengthen existing habitat networks and increase landscape connectivity These measures are calculated within and inform both the Biodiversity Net Gain Report [APP-218] and Biodiversity Net Gain Statutory Metric [APP-219]. It is assumed that the Consultee is satisfied that the aims and ambition of the LNRS has been addressed in the Biodiversity Net Gain Report [APP-218] and	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
				Biodiversity Net Gain Statutory Metric [APP-219] but that only clarity of where this is presented in ES Volume 1, Chapter 8 Biodiversity and Ecology [APP-044] is needed. At DCO Deadline 2, the following will be produced and submitted to assist with the understanding of LNRS adherence: East Pye DCO adopted measures in adherence with the Norfolk LNRS plan	
NE EB - 7	Summary / Ancient woodland and ancient/veteran trees NE9	Volume 1 Chapter 8 Biodiversity and Ecology [APP-214] Outline CEMP [APP-196] Outline Landscape and Ecology Management Plan [APP-199],	Natural England have advised that our standing advice, Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (Natural England and Forestry Commission, 14 January 2022. Available at: https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions) is adhered to in the OLEMP and OCEMP. Natural England acknowledge and welcome the implementation of a 30m buffer zone around veteran trees but for clarity and consistency of use, ask that it is referenced and secured in the LEMP, DEMP and CEMP.	The Applicant acknowledges that Natural England is satisfied with the conclusions of the sHRA Report [APP 220] and satisfied that the mitigation measures proposed within the Outline CEMP [APP-196] will also protect surrounding ancient woodlands and veteran/ancient trees. The measures will be secured by the final CEMP adopted for the Project. Reference to the protection zone for ancient and veteran trees will be clarified within the Outline CEMP [APP-196] and the Outline DEMP [APP-198].	Agreed
NE EB -9	International Designated Sites – Air Quality		With consideration to air emissions from the proposal and impacts to designated sites, we refer you to Appendix 1 of this letter - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects [NSIPs].	The Applicant acknowledges that Natural England agrees with the conclusions of the Shadow Habitat Regulations Assessment [APP-220] with regards to Internationally Designated Sites. The Applicant acknowledges Natural England's Standard Advice for Air Quality Impacts in NSIPs. The Standard Advice recommends a sequential approach and the use of the Institute of Air Quality Management's (IAQM's) 'Guidance of the Assessment of Air Quality Impacts on Designated Nature Conservation Sites' (2020) as well as Natural England's 'Guidance on the impacts of air pollution on protected sites' (2025) to undertake assessments. The assessment presented in ES Volume 1, Chapter 13 – Air Quality [APP-049] has been undertaken in accordance with these guidance documents and with consideration of Natural England's Standard Advice.	Agreed
NE EB - 10	National Designated Sites	ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]	The Appendix Flood Risk Assessment & Outline Surface Water Drainage Strategy Revision 2 [Document Reference: APP/6.3.9.1] identifies a	The Applicant acknowledges that Natural England agrees with the conclusions of ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]	Agreed

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
		Outline CEMP [APP-196]	hydrological link between the draft order limits of the project and the named SSSIs. On the basis that the embedded mitigation measures detailed within the Outline CEMP are implemented and secured, Natural England concurs that there will be no significant adverse effects on the named SSSIs. We advise that the mitigation measures to treat surface water run off for water quality and quantity into sensitive waterbodies listed in table 3.4 of the Outline Construction Environmental Management Plan Revision 1 [Document Reference: APP/7.1] are secured for the entire duration of the construction phase.	that there will be no likely significant adverse effects on Sites of Special Scientific Interest (SSSI) with mitigation contained within and secured by the implementation of the CEMP which will be in accordance with the Outline CEMP [APP-196]	
NE EB - 13	Landscape and Ecological Management Plan	Outline LEMP [APP-199]	NE welcomes Requirement 7 but advise it should explicitly secure management, monitoring and maintenance of all landscape and ecological measures for the full operational lifetime of the development. This should include long-term habitat performance indicators and remedial actions to ensure delivery of the outcomes set out in the LEMP.	The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline management, monitoring and maintenance measures. Further details will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and in accordance with the Outline LEMP. These will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032] .	Agreed

3.5 Soils and Agriculture

Table 3.4: Soils and Agriculture

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NE SA - 1	Agricultural Land Classification Methodology.	ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] and ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182] .	Natural England notes the Agricultural Land Classification (ALC) survey undertaken and associated methodology.	The Applicant notes that an Agricultural Land Classification (ALC) survey was undertaken by Amet Property Ltd and is reported in ES Volume 3, Appendix 15.1: Agricultural Land Classification [APP-182] .	Agreed
NE SA - 2	Agricultural Land Classification	ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] and ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182] .	Natural England welcome the survey density of one auger sample per hectare. However, as highlighted in our Relevant Representations, the survey coverage is not complete as it does not include the cable route corridor (CRC).	The ALC survey methodology and reporting is agreed. The Applicant notes that an Agricultural Land Classification (ALC) survey was undertaken by Amet Property Ltd and is reported in ES Volume 3, Appendix 15.1: Agricultural Land Classification [APP-182]. The survey covered 1,027.5 ha of agricultural land within a total survey area of 1,053 ha. A total of 1,052 auger borings and 27 soil inspection pits were completed across the survey area. The survey was undertaken at an average sampling density of approximately one observation per hectare, using a regular 100 m grid in accordance with the Ministry of Agriculture, Fisheries and Food (MAFF) Agricultural Land Classification methodology (1988). The Applicant considers that the survey provides a robust and representative assessment of land quality across the Proposed Development Comments on surveys of the CRC are addressed under NE SA-3.	Agreed
NE SA -3	Agricultural Land Quality cable route corridor NE5 - Soils and best and most versatile agricultural land – incomplete ALC Surveys	ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] , ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182] and outline Soil Resource and Management Plan [APP-204] .	Natural England notes that an Agricultural Land Classification (ALC) survey has not been completed for the Cable Route Corridor (CRC) and that the Applicant proposes to undertake ALC and soil surveys following refinement of the cable alignment and prior to construction. Natural England remains concerned that the absence of ALC survey information for the CRC limits the ability to fully assess the likely effects of the Scheme on agricultural land quality and Best and Most Versatile (BMV) agricultural land during the examination process. Natural England's advice remains that detailed ALC surveys should be undertaken across all areas that may be affected by the Scheme, including the CRC, in order that potential effects on the agricultural land	The Applicant notes that an ALC survey has not been undertaken for the Cable Route Corridor (CRC) at this stage, as the CRC currently encompasses a broad area of land. An ALC survey will be undertaken once the corridor has been refined to a working-width corridor prior to construction, with the findings informing the detailed Soil Resource Management Plan (SRMP). For the CRC, there will be limited impact from the works on agricultural land and soils. The works to install the cabling will take place over narrow strips of land and will be of short duration. The works will be carried out in accordance with the detailed SRMP. The Applicant commits to ensuring that the works and restoration of any disturbed land does not result in any downgrading of agricultural land quality. All land	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
			resource can be appropriately assessed and considered prior to determination of the application.	affected will be kept at, or restored to, a comparable ALC grade either as part of construction or as part of decommissioning. The preparation and approval of the detailed SRMP is secured through Requirement 18 of the draft DCO [AS-0321], which requires the SRMP to be prepared substantially in accordance with the Outline SRMP [APP-024] and approved by the relevant planning authority prior to the commencement of construction. Paragraph 15.5.19 and Table 15.4 of ES Chapter 15 [APP-051], recognise risk of temporary works (e.g. cable installation) causing permanent impacts. The detailed SRMP, prepared substantially in accordance with the Outline SRMP [APP-024] and informed by the pre-construction ALC survey, will provide site-specific information on land quality within the CRC and identify measures for soil handling, storage, reinstatement and the timing of works. The Applicant considers that implementation of these measures will minimise the potential for permanent effects on agricultural land quality arising from temporary construction activities. The potential for such effects has been recognised within the Environmental Statement and taken into account in the assessment. The deferral of ALC and soil surveys in cable route corridors has been accepted by Natural England and the Secretary of State on other solar NSIPs. For example: 1) EN010131 Gate Burton where the SoS considers the matter in his decision letter at paragraphs 4.150 and 4.151, accept that the CRC survey can be controlled under the DCO; 2) EN010123 Heckington Fen where the SoS decision letter at 4.23 refers to the final SoCG with NE [REP5-048] in which agreement to a post DCO soil survey including ALC was reached.	
NE SA - 4	Soil Baseline NE6 Soils and best and most versatile	ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051], and ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182]	Natural England notes that a limited area of peat has been identified within CRC7 at Hempnall Beck and that the Applicant proposes to utilise a trenchless crossing technique. Natural England agrees that, in principle, trenchless installation is the preferred approach where peat soils are present, as it minimises direct disturbance to the peat resource and	The Applicant notes that the soils across the solar panel areas were identified and recorded as part of the detailed ALC survey and are recorded in the ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182] . The survey provides detailed information on soil characteristics across the survey area, including soil type, depth and stoniness.	Agreed

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
	agricultural land – Peat Soils		avoids unnecessary excavation. Natural England's position is that any final design should demonstrate that the crossing would not adversely affect groundwater connectivity, hydrological function or the condition of the peat resource. Subject to appropriate evidence and detailed design demonstrating these outcomes, Natural England has no in-principle, objection to the proposed approach.	Whilst an area of 861 Isleham 2 association soils with potential for peaty characteristics was identified on the British Geological Survey maps, no peaty soils were identified to the ALC survey depth of 120cm within the solar panel areas. A limited area of peat has been identified within CRC7 at Hempnall Beck within Fritton Grange Meadows County Wildlife Site. The Outline CEMP [APP-196], provides for the trenchless techniques that will be used where peat is encountered adjacent to Hempnall Beck in Fritton Grange Meadows County Wildlife Site. Mitigation against loss of peat soils will be principally via design. The Applicant considers that this design measure will avoid direct disturbance of peat soils in this location. The trenchless crossing would be of limited diameter and is not anticipated to create a barrier to groundwater flow or adversely affect the water supply supporting the overlying peat.	
NE SA - 5	Effects on agricultural land and soils NE7	ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051], and ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182]	Natural England notes that the assessment methodology presented within the Soils and Agricultural Land chapter adopts bespoke sensitivity and magnitude criteria. Natural England remains concerned that the methodology does not fully reflect the principles set out within current ISEP “A New Perspective on Land and Soil in EIA” (2022) guidance, particularly in relation to the assessment of effects on Best and Most Versatile agricultural land. Table 3 of the 2022 ISEP guidance continues to use the established 5ha and 20ha BMV land loss significance cut-offs as previously published in the 2019 Design Manual for Roads and Bridges LA109 and ICE EIA Handbook, 2019. Natural England also notes that temporary and reversible impacts are generally categorised as low magnitude, irrespective of scale or duration. Natural England therefore considers that further justification should be provided to demonstrate that the assessment methodology appropriately reflects the sensitivity of affected agricultural land and soil resources and magnitude of impact and does not understate the significance of effects.	The Applicant has presented the assessment of effects in ES Volume 1, Chapter 15: Soils and Agricultural Land [APP-051], which identifies and assesses the potential effects of the Proposed Development on agricultural land and soils. Temporary, long-term temporary and permanent land take assumptions are set out within the chapter, including the assessment of effects on BMV agricultural land associated with mitigation planting. The Applicant notes that the assessment within ES Chapter 15 [APP-051] has been undertaken on a realistic worst-case basis. The areas of agricultural land affected on a temporary, long-term temporary and permanent basis are reported within the chapter and form the basis of the assessment of likely significant effects. The Applicant therefore considers that ES Chapter 15 [APP-051] provides a robust assessment of the potential effects of the Proposed Development on agricultural land and soils, including the potential permanent loss of BMV agricultural land under the assessed scenarios. This amounts to: (i) a likely loss of 15.1 ha (6.1 ha for the NG substation, 9.0 ha for woodland planting); (ii) a worst-case loss of 6.1 ha for the NG Substation; (iii) 9.0 ha for woodland planting (iv) 10.7 ha for access tracks; and	Under discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant's Position	Status
NE SA -6	Effects on agricultural land and soils	ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051], and ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182]	Natural England acknowledges that agricultural land quality formed part of the Applicant's site selection and design evolution process and notes that Chapter 5 demonstrates that the presence of BMV agricultural land was considered alongside environmental, engineering, operational and grid connection constraints. The Applicant's assessment identified a preference for the use of poorer quality agricultural land where reasonably practicable and records a number of design amendments undertaken to reduce impacts on BMV land. These include the removal of Sub-Site 3A from the Order Limits; the retention of Site 6 for agricultural and mitigation purposes; and amendments to parts of Sites 8 and 9 which reduced the extent of BMV land affected by the Scheme. However, notwithstanding the design evolution undertaken, approximately 68% of the surveyed land within the Order Limits is identified as BMV agricultural land and a number of permanent infrastructure elements, including the National Grid Substation, Project Substations and Battery Energy Storage System, remain located on Grade 2 agricultural land. Natural England accepts that the Applicant has provided evidence demonstrating that agricultural land quality has contributed to site selection and design development and therefore agrees that avoidance and minimisation of BMV land has been considered throughout preparation of the Scheme. Nevertheless, Natural England remains concerned regarding the extent of permanent BMV land affected by fixed infrastructure and maintains that greater clarity should be provided regarding the balance that was applied between agricultural land quality and other site selection constraints, particularly in relation to those infrastructure elements proposed on Grade 2 agricultural land.	(v) 12.1 ha for the BESS and Project Substation. The Applicant notes that the proposed National Grid Substation and Battery Energy Storage System (BESS) would be located within an area of Grade 2 agricultural land in the south-western part of the Site, adjacent to the Point of Connection (POC). Information regarding the site selection process is provided within the Site Selection Assessment [APP-215] and ES Chapter 5: Reasonable Alternatives and Design Evolution [APP-041]. These documents explain the operational and technical requirements that have informed the location of the permanent infrastructure in this part of the Site. The extent of Grade 2 land within this area is identified by the ALC survey reported in ES Volume 3, Appendix 15.1: Agricultural Land Classification [APP-182]. The Applicant acknowledges Natural England's preference for infrastructure to be located on lower quality agricultural land where practicable. However, the Site Selection Assessment [APP-215] and ES Chapter 5 [APP-041] explain the constraints associated with the location of the POC and the operational benefits of locating the BESS in close proximity to the POC. The Applicant therefore considers that the use of BMV agricultural land for this infrastructure has been minimised as far as reasonably practicable within the identified design and operational constraints. The Applicant further notes that not all project infrastructure would remain in-situ following the operational lifetime of the Proposed Development. The National Grid Substation and associated permanent works would remain as the only infrastructure element. The Outline Decommissioning Environmental Management Plan [APP/7.3] provides an overview of the Scheme, decommissioning activities and programme.	Under discussion
NE SA - 7	Soil	ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051], and ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182]	Natural England considers that the Outline Soil Resource and Management Plan provides an appropriate framework for the protection, handling, storage and reinstatement of soils during construction, operation and decommissioning of the	The Outline Soil Resource and Management Plan [APP-204] sets out the key principles for handling soils and ensuring, so far as possible, that soils and agricultural land quality are not adversely affected. A detailed SRMP will be produced pre-construction and	Agreed in principle subject to the preparatio

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant’s Position	Status
			Scheme. Natural England welcomes the commitment to prepare a detailed Soil Management Plan prior to commencement of works and notes that the Outline Soil Resource and Management Plan follows recognised soil management good practice (Defra, 2009, Construction Code of Practice for the Sustainable Use of Soils on Construction Sites). Notwithstanding this, Natural England considers that further detail should be provided within the detailed Soil Management Plan regarding the results of the Cable Route Corridor soil and ALC surveys, restoration criteria, monitoring and verification requirements, stockpile management and any peat-specific management measures where relevant. Subject to these matters being secured through the detailed Soil Management Plan, Natural England has no in-principle objection to the proposed soil management strategy.	will be secured by Requirement 18 in the Draft DCO [AS-032]. This will also be approved by the relevant planning authority pursuant to Requirement 18 in the Draft DCO [AS-032].	n and approval of a detailed SRMP

4 Signatories

4.1.1 The above SoCG is agreed between East Pye Solar Limited (the Applicant) and Natural England, as specified below.

4.1.2 Duly authorised for and on behalf of East Pye Solar Limited.

Name:	
Job Title:	
Date:	
Signature:	

4.1.3 Duly authorised for and on behalf of Natural England.

Name:	
Job Title:	
Date:	
Signature:	

Appendix A Record of Engagement

- A.1.1 The parties have engaged throughout the pre-application stage. In addition, the following stages of consultation has taken place:
- Non-statutory consultation ('Phase One' consultation) held between 23 October and 6 December 2024;
 - Statutory consultation ('Phase Two' consultation) held between 18 June and 6 August 2025; and
 - Targeted consultation held between 22 October and 26 November 2025.
- A.1.2 A summary of meetings and key correspondence that have taken place between the parties in relation to the Application is provided in **Table A.1**.

Table A.1:Record of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
General		
03 December 2025 – 17 December 2025	Email – Issuing and return of Issues Tracker	• A draft Issues Tracker was shared with Natural England on 03 December 2025. Natural England responded on 17 December with an updated version presenting their initial key issues.
Landscape and Visual		
12 February 2025	Scoping Opinion	• Natural England provided their standing advice on Landscape and Visual with reference to National Character Area, Green Infrastructure Design Guidance and Design Principles for National Infrastructure, the chapter has considered National Character Areas.
6 August 2025	PEIR Response	• Comments provided on buffer distances and soft landscaping planting. • The full comments and Applicant responses is provided in Consultation Report Appendix

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		11: Section 42 Applicant Response Table [APP-035]
Ecology and Biodiversity		
31 October 2024	Virtual Meeting	- Natural England accepted the proposed survey scope. - Agreement on the approach to wintering/passage birds and scoping out of dormice, reptiles and stone curlew. - Ongoing engagement through DAS consultation and protected species licensing.
12 February 2025	Scoping Opinion	- Comments on Norfolk Valley Fens SAC and The Broads SAC, Broadland SPA and Broadland SPA - Clarification that this is assessed within the Shadow HRA.
6 August 2025	PEIR Response	- Comments on topics including European designated sites, BNG, buffer zones from ancient woodland, hydrological linkages. - The full comments and Applicant responses is provided in Consultation Report Appendix 11: Section 42 Applicant Response Table [APP-035]
28 August 2026	Email correspondence	Shared SoCG
11 September 2026	SoCG discussion	Meeting: - Landscape and Visual - Ecology and Biodiversity
25 September 2026	SoCG Feedback	Soils and Agriculture