THE DROVES
SOLAR FARM

The Droves Solar Farm

Statement of Common Ground (SoCG) with Norfolk County Council

Prepared by: DWD
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Contents

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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 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.

1.1.2 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.

1.1.3 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 Norfolk County Council ('NCC')**.**

1.2.2 Collectively, the Applicant and NCC are referred to as 'the parties.'

1.3 Purpose of this Document

1.3.1 This SoCG is a 'live' document and will be amended as the examination progresses, including as more information becomes available and as a result of ongoing discussions between the Applicant and NCC, in order to enable a final version to be submitted to the ExA.

1.3.2 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

1.4.1 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

2.1.1 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 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.

2.1.2 The **Location Plan [APP/2.1] [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

3.1.1 The parties have been engaged in consultation since 19 September 2024.

3.1.2 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.

3.1.3 The Applicant and NCC have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has included discussions in relation to landscape and visual, population/economic impacts, glint and glare, ecology and biodiversity, cultural heritage/historic environment, traffic and transport, public rights of way and permissive footpaths, draft DCO, water, flood risk and drainage, waste management, and BESS/fire safety.

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

Table 3.1 – Record of Engagement

Date	Form of Correspondence	Key topics discussed and key outcomes
29/10/2024	Monthly Planning Catch-Up Meeting	• Scoping stage programme • Summary of Co:Design • Progress update on environmental surveys
14/11/2024	Email correspondence from NCC	• Review of survey scope to inform the application • Agreed need for additional follow up surveys in summer 2025
26/11/2024	Monthly Planning Catch-Up Meeting	• Publishing of workshop summary report • Drafting of Statement of Community Consultation • Agricultural Land Classification grading process
07/01/2025	Consultation letter and Email Correspondence from the Applicant	• Consultation on the LVIA methodology, assessment approach, cumulative and viewpoint locations • No response was received from NCC; therefore, the Applicant's assessment progressed on the

		assumption that the proposed approach was acceptable
21/01/2025	Informal SoCC discussion	• NCC keen to engage with the Applicant from an early stage and to get feedback on the SOCC feedback • NCC planning to draft this next year, and will share the full document for the Applicant to comment on
24/02/2025	Workshop	• Discussion on health assessment methodology for EIA • NCC confirmed agreement
03/03/2025	Workshop	• Discussion to inform development of Employment and Skills Strategy
29/04/2025	Monthly Planning Catch-Up Meeting	• Design update and introduction to design principles • Percentage of BMV land use • Introduction to the strategies underpinning the concept masterplan (placemaking, access and biodiversity) • Location and delivery of National Grid Substation
08/05/2025	Briefing	• Pylons and height of solar panels addressed • Lifecycle clarified and panel height options detailed
29/07/2025	Monthly Planning Catch-Up Meeting	• Cumulative impact of solar farm applications within Norfolk County Council • Statutory Consultation summary and debrief • Sharing that a targeted consultation will take place 3 September 2026 until 1 October 2026
19/08/2025	Monthly Planning Catch-Up Meeting	• Presentation to set out the changes included in targeted consultation • The Applicant set out intention to share the Adequacy of Consultation Milestone (AoCM) with PINS and the LPAs • Submission programme update
09/09/2025	Follow Up on LLFA Comments from PEIR	• Climate change allowances – Flood risk and SuDS design • 2D rainfall model / information to be presented

		• SuDS principles and how these are secured • Firewater management
30/09/2025	Monthly Planning Catch-Up Meeting	• Update on progress of target consultation
29/10/2025	Monthly Planning Catch-Up Meeting	• Update on progress of submission

3.1.5 The following tables detail, by topic, the matters agreed, under discussion, or not agreed between the Applicant and NCC at the point of this document being published.

4 Matters of Discussion

4.1 Overview

4.1.1 The following tables set out the position of the Applicant and NCC, following a series of meetings and discussions with respect to the key areas of the Scheme. This includes matters where discussions are ongoing.

1 – Landscape and Visual

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 1-1	Key Views	NCC raises concerns about the impact of the height of the infrastructure involved in the Scheme, and how this has the potential to have a significant impact on visibility across a sensitive environmental and historic area.	Assessed landscape and visual effects are detailed within **ES Chapter 6: Landscape and Visual [AS-016]**, which outlines potential landscape and visual impacts upon receptors within the Nar Valley and Castle Acre, as a result of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area, including those within Castle Acre and the Nar Valley. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order Limits.	Under Discussion
NCC 1-2	Solar modules	NCC are disappointed that the height of the solar modules is retained at 4.5m, and that a height of 3.5m would have less of a landscape and visual impact.	The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 5: The Scheme [AS-014]**. These parameters represent a realistic	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
			worst-case scenario for the purposes of the Environmental Impact Assessment. The Scheme will likely comprise a mixture of fixed and tracker panels, although it is envisaged that the solar element of the project would contain fewer tracker panels. The tracker panels allow for maximising the efficiency of the panels as they track the movement of the sun.	
NCC 1-3	Mitigation	NCC comment that the absence of undergrounding leaves a significant gap in mitigation for landscape and visual impacts.	As set out in **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP-053]** there are no significant effects arising from the proposed new OHL reported within the ES, and the Site is not within a National Landscape, as such it was not considered necessary to further explore undergrounding as an alternative option.	Under Discussion
NCC 1-4	Landscape character sensitivity and value	NCC are concerned that subsequent judgements on landscape amenity do not appear to fully reflect the increased susceptibility of the characteristics in the study area. Where susceptibility is underplayed, there is a risk that significant landscape effects also become understated. NCC also request the applicant to:	**ES Chapter 6: Landscape and Visual [AS-016]** outlines potential landscape and visual impacts because of the Scheme. Paragraph 6.5.18 and Table 6-3 outlines the approach in determining the susceptibility, and therefore sensitivity, of landscape and visual receptors within the study area. The Site falls within numerous Landscape Character Areas (LCA) as outlined within the Breckland Landscape Character Assessment (2007)	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
		• Provide further justification explaining how the identified susceptibility factors have been weighted in reaching the overall landscape sensitivity judgements; • Clarify how perceptual qualities such as tranquillity, enclosure, skyline integrity and recreational function have influenced sensitivity conclusions; and • Confirm that sensitivity judgements are considering baseline online and not including assumptions about mitigation effectiveness.	and confirmed and validated through fieldwork. A review of published assessments and fieldwork to Site and the surrounding study area informed a professional judgement of the identified susceptibility factors and the landscape sensitivity judgements made. The variation in identified susceptibility factors for different LCA's, informed the weighting of the overall landscape sensitivity judgements. Perceptual qualities such as, but not limited to, tranquillity, enclosure, skyline integrity and recreational function have influenced sensitivity conclusions through an assessment of landscape value included within **ES Appendix 6.5: Evaluation of Landscape Value [APP-143]**. The perceptual characteristics of other LCAs within the wider Study Area were also identified through desktop studies of published material and numerous extensive fieldwork visits within summer and winter months. It is confirmed that sensitivity judgements consider baseline conditions only and do not include assumptions regarding mitigation effectiveness. The methodology for assessment is detailed within Section 6.5	

Reference	Topic	Consultee's Position	Applicant's Position	Status
			of **ES Chapter 6: Landscape and Visual [AS-016]**.	
NCC 1-5	Landscape value	NCC note that the Applicant has put an emphasis on the lack of national or local designations, but NCC feel this approach risks underrepresenting values such as experiential and perceptual value, recreational value, and the contribution of historical landscape features. NCC ask the Applicant to: • Clarify how experiential and recreational qualities that have been identified in the baseline have been considered when determining landscape value, particularly where landscapes are not formally designated but contribute to the perceived value and enjoyment of the area; • Consider recognition of higher community value in sensitivity judgements; and • Consider additional mitigation or enhancement measures where effects are identified.	The methodology for assessing landscape value is detailed within Section 6.5 of **ES Chapter 6: Landscape and Visual [AS-016]**. Definitions of varying levels of landscape value are detailed within Table 6-2. Experiential and recreational qualities identified in the baseline have been considered when determining landscape value and have influenced sensitivity conclusions through an assessment of landscape value included within **Table 3** of **ES Appendix 6.5: Evaluation of Landscape Value [APP-143].** This value assessment considered a number of factors such as Natural Heritage, Cultural Heritage, Landscape Condition, Associations, Distinctiveness, Recreational, Perceptual (scenic), Perceptual (wilderness and tranquillity) and Functional. The value rating for these factors varied between local value, community value and limited value – reflecting the presence and value of respective qualities within the Site and its context. The ratings used for the evaluation of landscape value are set out clearly within the LVIA	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
			assessment methodology section 6.5 of **ES Chapter 6: Landscape and Visual [AS-016]**. In decreasing order, the ratings include national/International (highest landscape value), local/district value, community value and lastly limited value (lowest landscape value). This methodological approach was included within the Scoping Opinion Request shown within [**APP-133**] 6.4 Environmental Statement Appendix 2.1: EIA Scoping Opinion Request. With regard to consideration of 'higher community value', this terminology doesn't align with the assessed methodology. The next highest value rating is 'local', of which the landscape would not be regarded of local value which is defined as having locally designated landscapes (of which there are none). There are a number of different mitigation measures embedded within the Scheme which have been included to limit potentially adverse effects upon the landscape. These mitigation measures are secured by the **Design Principles, Parameters and Commitments [APP/5.8.1]**, the spatial extents shown on the **Works Plan [APP-009]**, the **outline Operational Environmental Management Plan (oOEMP) [APP/7.8.1]** and the **outline**	

Reference	Topic	Consultee's Position	Applicant's Position	Status
			Landscape and Ecological Management Plan (oLEMP) [APP/7.11.1].	
NCC 1-6	Recreational Receptors	NCC are concerned that the change in landscape character may be more substantial than reflected in the Applicant's conclusions, as the effect for recreational users is cumulative rather than experienced at individual viewpoints. NCC request clarity on how experiential change along the routes has been assessed, outside of individual viewpoints, and for the Applicant to consider route specific mitigation measures through planting or landscape enhancements to offset experiential change.	The Applicant does not agree that the change in landscape character experienced along the routes may be more [substantial] than is reflected in the conclusions. **ES Chapter 6: Landscape and Visual [AS-016]** outlines potential landscape and visual impacts as a result of the Scheme. ES Chapter 6 assessed the potential sequential visual effects upon visual receptors within the Site and study area. Para 6.6.71 of ES Chapter 6 states *"The different types of groups assessed within this ES chapter encompass local residents; people using key longer distance routes such as roads, cycle ways, recreational routes and navigable waterways; people within accessible or recreational landscapes; people using PRoW; or people visiting key viewpoints. In assessing areas of settlement, PRoW and local roads, receptors are grouped into areas where effects might be expected to be broadly similar, or areas which share particular factors in common. Longer distance routes and specific viewpoints are not included within these groupings, to allow the sequential experience of travelling along the routes or the key*	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
			elements that make up a specific view to be considered in a coherent way." Generally, the assessment considers visual effects upon routes as part of their wider respective Visual Receptor Group (VRG). A total number of 7 VRGs have been identified within the Site and Study Area. Para 6.6.84 of ES Chapter 6 states "*Where receptors overlap with one or more VRGs, i.e. PRoW within the Site that extend across both VRG 1 and VRG 2, they are considered within both VRG's. This approach highlights any variations in effect upon a Receptor across the Site which may occur due to proximity to new development and the type of new development proposed at certain points along a route, for example."* For longer distance routes, i.e the Peddars Way and Norfolk Coast Path, routes are assessed as a "standalone" receptor with narrative on potential sequential views. Route specific mitigation is included within mitigation measures embedded within the Scheme which have been included to limit potentially adverse effects upon landscape and visual receptors. These mitigation measures are secured **Design Principles, Parameters and Commitments [APP/5.8.1]**, the spatial extents shown on the **Works Plan [APP-**	

Reference	Topic	Consultee's Position	Applicant's Position	Status
			009], the **outline Operational Environmental Management Plan (oOEMP) [APP/7.8.1]** and the **outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11.1]**.	
NCC 1-7	Recreational Receptors	NCC also requests further clarification on the advanced planting and phasing of landscape mitigation to ensure the prevention of significant effects.	One of the aims of the advanced planting is to increase visual screening from year 1 of the operational phase. Advanced planting works have taken place in winter 2025/2026. The linear length of advanced planting approximately 3.8km. Details of the advanced planting areas are included within **oLEMP [APP/7.11.1].** Phasing of the remaining landscape mitigation areas would be confirmed during detailed design and post consent. It is envisaged that all proposed planting would be undertaken during the construction phase as soon as practically possible, to maximise growing time before operation and the effectiveness of visual screening.	Agreed

Table 2 – Population / Economic Impacts

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 2-1	Compensation	NCC note that compensation packages mentioned in the PEIR stage have not	The **Planning Statement [APP/5.5.1]** confirms that community	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		been included in the application. NCC therefore expects Droves Solar Farm Limited to fully engage with those local communities affected by this development; and for the EIA and Environmental Statement (ES) to reflect that engagement.	benefits would be realised at a local level, should consent be granted for the DCO Application. For example, the **oLEMP [APP/7.11.1]** establishes how permissive paths proposed as part of the Scheme will be designed and implemented to improve accessibility across the Site. The **outline Employment, Skills and Supply Chain Strategy (oESSCS) [APP-195]** sets out proposals to promote local apprenticeships and training schemes, with the aim of enhancing local skills and qualification rates. The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining the DCO Application. However, it will be available to fund local projects. The Applicant will continue engagement post-application, to support the development and delivery of community benefits.	

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 2-2	Community Benefits	NCC note that a Community Benefit Fund was mentioned in the PIER stage but has not been included in the application. NCC therefore expects Droves Solar Farm Limited to establish such a fund.	The **Planning Statement [APP/5.5.1]** confirms that the Applicant has committed to providing a Community Benefit Fund, should consent be granted for the DCO Application. The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining the DCO Application. However, it will be available to fund local projects.	Agreed

Table 3 – Glint and Glare

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 3-1	Consultation	NCC has raised concerns over the need to consider the impacts of glint and glare as recommended by the Ministry of Defence and Civil Aviation Authority.	These concerns are noted and addressed in the SoCG with the MoD.	Under Discussion

Table 4 – Ecology and Biodiversity

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 4-1	Buffers	NCC remains concerned that adequate buffer areas round badger setts should be maintained, in line with guidance from the Badger Trust and that any works which has the potential to disturb badgers may require a licence.	Safeguards with regard to Badger are detailed within the **ES Appendix 7.2: Baseline Ecological Survey Report [APP-148]**. Badger within the site are habituated to disturbance within close vicinity to their setts given the current agricultural use, with fields adjacent to these setts being regularly disturbed by ploughing etc.	Under Discussion
NCC 4-2	BNG	NCC advises that the Applicant should be aware of upcoming changes to BNG in relation to NSIPs, as they are concerned about how they will influence the design of the proposed BNG. Further detail as to how BNG will be secured is also needed.	The Applicant notes this comment and can confirm the BNG Assessment and Report have been updated at Deadline 1 where applicable.	Agreed
NCC 4-3	Arboriculture	NCC consider that there are foreseeable negative impacts to trees adjacent to the highway that do not appear to be considered within section 16.4 of the Environmental Statement or the AIA and has identified potential conflict across certain documents. If the impacts are not avoided or insufficiently mitigated then alternative access routes will need to be considered.	The Applicant disagrees with NCC's assertion that there are foreseeable negative impacts to trees adjacent to the highway that have not been assessed within Section 16.4 of the Environmental Statement. **The Arboricultural Impact Assessment (ES Appendix 16.4 [APP-178])** provides a comprehensive assessment of the likely impacts on existing trees, groups of trees,	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
			woodlands and hedgerows. This assessment has been informed by, and is consistent with, the tree removal and management approaches set out on the **Vegetation Removal Plan, Appendix 2** of the **oLEMP [APP/7.11.1].**	

Table 5 – Cultural Heritage/Historic Environment

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 5-1	Archaeology	NCC note that an amended version of ES Chapter 8, Appendix 8.7: Outline Archaeological Mitigation Strategy (APP-161) has been agreed which includes the undertaking of further trenching with the amount and location of any additional trenching being proportionate to the overall cumulative impacts, and to be confirmed following completion of the detailed design.	The Applicant agrees that sufficient information has been provided in order to formulate a mitigation strategy for the potential impacts of the Scheme upon the archaeological resource.	Agreed

Table 6 – Traffic and Transport

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 6-1	Construction Traffic	NCC deem that Route C (via South Acre Road) is not appropriate for construction or operational traffic, including both LGVS and HGVs, so that all traffic should instead route via the A1065 to the east.	The Applicant notes the NCC position regarding Route C and vehicle routing as part of the relevant representations – the routing has been amended in both the **outline Construction Traffic Management Plan (oCTMP) [APP/7.7.1]** and **outline Operational Traffic Management Plan (oOTMP) [APP/7.9.1]** to reflect NCC's request, with updated versions of these documents submitted at Deadline 1. The assessments within **ES Chapter 9: Transport and Access [APP/6.2.1]** have also been updated at Deadline 1 to reflect this change and it remains the case that no significant effects are anticipated.	Agreed
NCC 6-2	Cumulative traffic impacts	NCC raised comments regarding the methodology applied in assessing the cumulative transport impact from the Scheme in relation to the nearby High Grove solar farm.	The Applicant is discussing the methodology applied in assessing the cumulative transport impact from the Scheme with NCC.	Under discussion
NCC 6-3	Access	NCC raised queries on the requirements and purpose for each of the access junctions that are associated with the Scheme, for both	The Applicant is discussing this matter with NCC.	Under discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
		construction and operational access, as well as clarifications on the routing of traffic from each access point.		

Table 7 – Public Rights of Way and permissive footpaths

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 7-1	PRoW Management	NCC has no comments on the Outline Public Right of Way and Permissive Path Management Plan at this stage. A more detailed discussion regarding the scope and nature of the works will be required.	The Applicant welcomes future discussion on the **outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP-192]** that is secured by way of requirement in the DCO.	Agreed
NCC 7-2	Access	NCC note that all PRoWs and Byways should be kept open or diverted if unable to open, and requested further detail required on what the stopping up would consist off and for how long it would last.	It is anticipated that all PRoWs will be kept open during construction, otherwise a suitable diversion will be provided. However, it is not possible to confirm this until the contractor is appointed and the construction methodology is confirmed. The details for any closures required and management strategy is initially provided in the **oPRoWPPMP [APP-192]**, and the corresponding detailed plan	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			will be secured by way of a requirement in the DCO and provided prior to the commencement of the construction phase.	

Table 8 – Draft DCO

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 8-1	Protective Provisions	NCC would expect any temporary or permanent highway mitigation to be secured through Protective Provisions in the DCO; and by the developer entering into a Section 278 or a Small Highway Works Agreement.	The detailed design of any highway works within the public highway are to be agreed with Norfolk County Council via the process in the **Draft DCO [APP/3.1.1]** that effectively mirrors a typical Section 278 or Small Highway Works agreement. The details of these works would be confirmed with Norfolk County Council post-consent, prior to the commencement of the construction phase.	Agreed

Table 9 – Water, Flood Risk & Drainage

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-1	Completeness of FRA and Evidence Base	The LLFA considers that the FRA and associated evidence base are incomplete and inconsistent. Key elements are missing or insufficiently evidenced, including surface water risk assessment across all Works and phases, pre and post development comparisons, consistent modelling outputs and clear demonstration of policy compliance. The LLFA notes reliance on assumptions and future submissions rather than a robust application stage assessment.	The Applicant does not agree that **ES Appendix 12.2: Flood Risk Assessment [AS-053]** is incomplete. The FRA provides a proportionate, risk-based assessment in line with NPS EN-1 and the NPPG, appropriate to the outline nature of the Scheme. Where detail is not yet fixed, the Applicant considers it reasonable for this to be refined post-consent, with conservative assumptions applied at this stage, as secured through **oCEMP [APP/7.6.1], Design Principles, Parameters and Commitments [APP/5.8.1]** and **oLEMP [APP/7.11.1]**. This approach is consistent with other Solar DCO applications such as the consented West Burton Solar Farm and Great North Road Solar & Biodiversity Park.	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-2	Lifetime of Development	The LLFA considers that the assessment adopts an inadequately short lifetime, relying on a 60 year operational period that does not reflect the full development lifetime.	The Applicant considers a 60-year operational lifetime to be appropriate and proportionate for the Scheme. Construction and decommissioning phases are acknowledged and managed through the **oCEMP [APP/7.6.1]** and **outline Decommissioning Strategy (oDS) [APP/7.10.1].**	Under Discussion
NCC 9-3	Climate Change Allowances	The LLFA states that the FRA has not sufficiently justified the selection of a 40 % climate change allowance for pluvial flood risk and is not explained to the same level as fluvial allowances. Different climate change allowances appear to be applied to fluvial risk, pluvial risk, and SuDS surface water management, and the LLFA consider this as inconsistent. The climate change allowances should reflect the full lifetime of the development which typically expects at least 75 years for non-residential development. It is unclear whether climate change allowances have been embedded within	The Applicant considers the application of a 40 % climate change allowance represents a conservative and proportionate approach in accordance with Paragraph 13.1.5 of the Norfolk LLFA Statutory Consultee Guidance (Document Version 7.3, April 2025). Allowances are applied where relevant within **ES Appendix 12.2: Flood Risk Assessment [AS-053]** and SuDS design, with detained drainage inputs and modelling refinements secured through the **Design Principles, Parameters and Commitments [APP/5.8.1]**.	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
		modelling, temporary works, construction and decommissioning phases.		
NCC 9-4	Sequential Test and Site Layout	The LLFA considers that the Sequential Test has not been adequately applied, particularly in relation to pluvial flood risk. The LLFA notes inconsistencies within the FRA and ES and whether infrastructure is avoided or mitigated within identified flow paths. The rationale for locating elements within areas of surface water flood risk is not clearly justified nor demonstrated that reasonable alternatives have been exhausted. Therefore, the LLFA are unconvinced that the Sequential Test has been fully or correctly applied across all Works and flood risk sources.	The Applicant maintains that the Scheme has been sequentially designed to avoid areas at highest flood risk where practicable, with all infrastructure located in Flood Zone 1 and outside of identified surface water flow paths, as identified within **ES Appendix 12.2: Flood Risk Assessment [AS-053]**. Where minor encroachments occur, these are justified through design mitigation and the operational requirements of the Scheme, secured within **Design Principles, Parameters and Commitments [APP/5.8.1]**.	Under Discussion
NCC 9-5	Ordinary Watercourses	The LLFA raises concerns of the lack of clarity and supporting evidence of the presence of ordinary watercourses. Conflicting statements are made about whether ditches connect to the wider hydrological network, and insufficient mapping to clearly evidence disconnection. The LLFA also notes uncertainty around where	The Applicant's position is that no Ordinary Watercourses are affected by the Scheme. Features identified on site are described as man-made ditches or blind ditches that are not hydraulically connected to the	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
		access tracks cross water features and whether ordinary watercourse consents may be required.	wider watercourse network and therefore do not require an Ordinary Watercourse Consent, as outlined within **ES Chapter 12: Water Resources [APP-061]**. The Applicant considers this position supported by site walkovers and mapping provided in **ES Figure 12.1 – Ephemeral / Blind Ditches [APP-115]** and **ES Figure 12.2 – Indicative Watercourse Crossings [APP-116]**.	
NCC 9-6	Surface Water Flood Risk	The LLFA considers that surface water flood risk has not been comprehensively or consistently assessed. Key concerns include missing or unclear assessment of pre and post development conditions, limited consideration of surface water in earlier ES chapters, and incomplete coverage of all Works and phases. The LLFA identify gaps in how flow paths, exceedance routing, and interaction with site layout are addressed.	The Applicant states that all sources of flood risk, including surface water flood risk, have been assessed within **ES Appendix 12.2: Flood Risk Assessment [AS-053]**. The Scheme will be designed to ensure no increase to surface water flood risk on or off site, with runoff managed through greenfield runoff principles, infiltration where feasible, and the future provision of SuDS secured through the **oCEMP [APP/7.6.1]** and **oOEMP**	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
			[APP/7.8.1]. The Applicant considers the assessment proportionate given the current design stage, with further detail secured through DCO requirements.	
NCC 9-7	Hydraulic Modelling	The LLFA expresses low confidence in the hydraulic modelling to support the FRA. The LLFA does not consider the model suitable to validate flood extents, depths or mitigation effectiveness.	The Applicant considers the hydraulic modelling approach to be appropriate and proportionate given the scale and nature of the Scheme and the available data. The model is intended to provide a risk-based assessment, rather than a fully calibrated predictive model. The Applicant acknowledges that refinements may be made but does not accept that the current model is fundamentally flawed or unsuitable for informing the **ES Appendix 12.2: Flood Risk Assessment [AS-053]** conclusions, given the outputs corelate with national datasets from the Environment Agency.	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-8	Construction Phase Flood Risk	The LLFA considers that construction phase flood risk has not been sufficiently assessed or mitigated. Temporary works present flood risk, yet surface water management plans are deferred to future plans or insufficiently detailed. The timing of drainage installation relative to construction activities is unclear, and climate change allowances are not transparently embedded for temporary phases.	The Applicant accepts that construction presents temporary flood risk, but considers this adequately managed through mitigation commitments secured in the **oCEMP [APP/7.6.1]**. Temporary drainage, SuDS, sediment control, and water management measures will be implemented prior to and during construction.	Under Discussion
NCC 9-9	Access Tracks and Crossings	The LLFA raises concerns regarding the flood risk implications of access tracks and crossings, particularly where tracks are described as semi-permeable or potentially permanent. The LLFA does not accept that compacted aggregate tracks can be considered permeable and notes insufficient evidence of how run off from these routes will be managed. There is uncertainty of where tracks cross watercourses, whether appropriate drainage and culverts are proposed, and how long term design life is being considered.	The Applicant's position is that access tracks are designed with drainage in mind, using reduced permeability materials and trackside drainage ditches, swales and cross-drainage to manage runoff, as secured through the **oCEMP [APP/7.6.1]** and **oOEMP [APP/7.8.1]**. Any crossings are over man-made ditches rather than Ordinary Watercourses. Final design, including culverts and drainage, will be confirmed at detailed design stage and secured by requirement.	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-10	Mapping, Figures and Referencing	The LLFA identifies issues with mapping quality, figure clarity and document referencing, undermining confidence in the evidence. The LLFA considers that these presentation issues materially affect the interpretation of flood risk and mitigation proposals.	The Applicant acknowledges that some figures and tables with **ES Appendix 12.2: Flood Risk Assessment [AS-053]** require clarification or correction and confirms that updates have been or will be made. The Applicant considers these to be presentation issues rather than substantive assessment flaws, and does not accept that they undermine the conclusions of **ES Appendix 12.2: Flood Risk Assessment [AS-053]** or **ES Chapter 12: Water Resources [APP-061]**.	Under Discussion
NCC 9-11	SuDS and Drainage Strategy	The LLFA considers that there is no clear site-wide SuDS or drainage strategy currently demonstrated. Commitments to SuDS are inconsistent between the ES and FRA, and are limited to certain Works or deferred to post-consent design stages without sufficient evidence of space, feasibility or coverage.	The Applicant does not agree that there is inconsistency between commitments to SuDS in the ES and FRA. Both ES Chapter 12: Water Recourses [APP-061] and **ES Appendix 12.2: Flood Risk Assessment [AS-053]**: confirm a commitment to SuDS across relevant Works, designed to the 1 % AEP plus climate change allowance, with drainage principles set out in	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
			both documents. Given the outline nature of the Scheme at DCO stage, the Applicant considers it appropriate that detailed SuDS design is secured through requirements within the **oCEMP [APP/7.6.1]** and **oOEMP [APP/7.8.1]** rather than fixed at application stage.	
NCC 9-12	Impermeable Areas and Infrastructure	The LLFA notes that the FRA and ES do not consistently or transparently address the extent and implications of impermeable areas. There are uncertainties about finished ground levels, consolidation platforms and the long term retention of infrastructure.	**ES Appendix 12.2: Flood Risk Assessment [AS-053]** states that impermeable areas have been assessed conservatively often assuming worst case impermeability for outline drainage calculations. Runoff from infrastructure such as substation, BESS, access tracks and conversion units will be managed through infiltration, filter drains, swales and attenuation as required, as secured through **oCEMP [APP/7.6.1]** and **oOEMP [APP/7.8.1]**. Final layouts and finished floor levels and drainage measures will be confirmed at detailed design,	Under Discussion

Reference	Topic	Consultee's Position	Applicant's Position	Status
			with compliance secured through the DCO.	
NCC 9-13	Infiltration and Ground Conditions	The LLFA considers that infiltration evidence is insufficient. Infiltration is limited to Work Nos. 2-4 and does not demonstrate viability across the wider development. Assumptions on ground conditions and infiltration are viewed as unsupported.	The Applicant maintains that infiltration is viable and appropriate, supported by site-specific testing. Infiltration testing was not extended to the wide site areas as infiltration will continue to occur as per baseline conditions. The Scheme does not increase surface water runoff in these areas, as outlined in section 12.3.16 of the **ES Appendix 12.2: Flood Risk Assessment [AS-053]**.	Not Agreed
NCC 9-14	Ground Levels and Decommissioning	The LLFA have concerns that ground levels, earthworks and decommissioning outcomes are unclear and inconsistently described. It is not clear whether ground reinstatement relates to pre-development or finished ground levels, nor whether imported materials used to create platforms will be fully removed. The LLFA considered that retained materials or altered levels could permanently affect surface water	Ground levels and decommissioning have been adequately addressed at a proportionate level. The majority of below-ground infrastructure will be removed or cut down to 1.2 m below ground, allowing the land to be reinstated for agricultural use and restoring baseline drainage conditions as	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		flow paths and flood risk beyond the operational phase.	far as practicable, as outlined within the **oDS [APP/7.10.1]**.	
NCC 9-15	Battery and Fire Water Management	The LLFA considers that battery safety and firewater management have not been sufficiently assessed of integrated with flood risk considerations. Specifically, there is inadequate evidence showing how firefighting water and contaminated runoff from BESS and substations would be managed, contained and prevented from increasing flood risk or polluting watercourses. The LLFA also notes limited consideration of the interaction between the Battery Safety Management Plan and the Flood Risk Assessment, reducing confidence that emergency scenarios have been fully and consistently addressed.	Battery safety and fire water risks are appropriately addressed through the **outline Battery Safety Management Plan (oBSMP) [APP-194]** and **oCEMP [APP/7.6.1]**. Fire prevention, suppression, and containment measures will be implemented to ensure fire water runoff is managed and controlled. The Applicant disagrees with the LLFA on the limited interaction between the Battery Safety Management Plan and Flood Risk Assessment, noting consistency in measures and procedures across both documents as well as with the measures secured in the management plans. Both documents outline that fire suppressant would be entirely contained in dedicated tank structures and that a penstock	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			would prevent interaction with infiltration structures.	
NCC 9-16	Ecology Mitigation Areas	The LLFA raises concerns that ecology mitigation areas are being relied upon to deliver flood risk benefits without sufficient evidence. In particular, areas proposed for skylark and curlew mitigation are currently subject to arable cropping and pig farming, which can increase compaction and surface water runoff. The LLFA notes uncertainty over future land management, grazing intensity, crop rotation, and whether pig farming will be removed. Without clarity and secured commitments, the LLFA considers that the claimed surface water and flood risk benefits from ecological mitigation areas may be overstated or not realised in practice.	The Applicant considers that ecology mitigation areas are appropriately designed and will be managed to deliver ecological benefits without increasing flood risk. Future land management will be adapted as necessary, with flexibility retained at DCO stage and detailed arrangements confirmed post-consent, secured through **ES Chapter 7: Ecology [APP-056]**, **ES Chapter 12: Water Resources [APP-061]** and **ES Appendix 12.2: Flood Risk Assessment [AS-053]**. **Chapter 12: Water Resources [APP-061]** will be updated at a future Deadline to provide clarification on pig farming and runoff regarding benefits within the immediate catchment of the Scheme and whether rotation of the same number of livestock is proposed.	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-17	Grassland, Grazing and Agriculture	The LLFA considers that reliance on grassland establishment and grazing to manage surface water runoff is uncertain. It notes that grassland typically requires 12 – 18 months to establish, during which flood risk benefits may not be realised. Concerns are raised that grazing could lead to soil compaction, bare ground and increased runoff. The LLFA also highlights that existing pig farming may limit the claimed flood risk benefits unless clearly removed or managed.	**ES Appendix 12.2: Flood Risk Assessment [AS-053]** states grassland establishment and agricultural management would occur prior to the construction phase and have been assessed using a reasonable worst case scenario. Grazing is proposed only as a management option and would be managed via the **oLEMP [APP/7.11.1]**. The Applicant does not rely on grassland as primary flood mitigation but considers it contributes to maintaining baseline conditions.	Under Discussion

Table 10 – Waste Management

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 10-1	Minerals	NCC highlights it does not consider that the proposed development will result in needless sterilisation of safeguarded mineral resources. This is due to the temporary nature of the project, the founding methods to be used for the project,	The Applicant is pleased to have reach agreement with NCC on the impact of the Scheme on safeguarded mineral resources.	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		and the limited areas of safeguarded mineral resources within the project boundary.		
NCC 10-2	Re-use of materials	NCC notes that a Site Waste Management Plan (SWMP) will be developed as part of an Operational Environmental Plan to address waste prevention, reuse, recycling and recovery during the Operational Phase. It will be submitted under a requirement of DCO. NCC agrees that the measures are appropriate at this stage and will provide any further comments on the details contained within the draft DCO and the requirements of the DCO at a future date.	The Applicant is pleased to have reached agreement with NCC regarding the effects of the Scheme on waste management capacity in the vicinity of the Site, the measures to control waste within the **oCEMP [APP/7.6.1]**, and the commitment to prepare a Site Waste Management Plan (SWMP). The Applicant also welcomes NCC's comments on the draft DCO, when available.	Agreed

Table 11 – BESS / Fire Safety

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 11-1	Infrastructure	The LLFA notes that there is no information for either of the substations or the wider BESS site platforms (although an individual battery storage unit is included). There is also no information relating to the proposed design of the 10 new pylons and additional grid connection infrastructure.	Typical BESS system layout and an indicative substation layout has been provided within **ES Chapter 5: The Scheme [APP/6.1.2]** at Plate 9 and Plate 11, respectively.	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			Visualisations of the Scheme, both parameter based and the illustrative design, from a number of assessed viewpoints within the wider study area are included within **ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [AS-023] [AS-025] [AS-027] [AS-029], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031] [AS-033] [AS-035] [AS-037], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] [AS-041] [AS-043]** and **ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045] [AS-047] [AS-049]**.	
NCC 11-2	Infrastructure	There is also no information relating to the proposed design of the 10 new pylons and additional grid connection infrastructure.	The assessment of the Scheme has been based on the Rochdale Envelope and the maximum and minimum parameters within it; should consent be granted, the detailed design of the Scheme would be undertaken in accordance with the **Design**	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			Principles, Parameters and Commitments [APP/5.8.1]. Indicative information has been provided as part of the DCO Application to aid in understanding and visualising these parameters but does not form part of the design being sought for approval.	
NCC 11-3	Infrastructure	A route plan is provided in Appendix 5.1 Plate 7, although due to the lack of symbology or legend on the plan combined with limited labelling, it is not possible to determine what is being shown / depicted or where this extract is in relation to the proposed development. Further information is required.	**ES Appendix 5.1: Illustrative Technical Information [AS-051]** has been updated at Deadline 1 to replace Plate 7 with an updated Illustrative Grid Connection Routing drawing, capturing tweaks to the illustrative layout, that also includes a key to aid in interpreting the drawing. Updates to this Appendix have also been made to provide indicative pylon and pylon foundation design information.	Agreed

THE DROVES

SOLAR FARM