

The Drovers Solar Farm

Statement of Common Ground (SoCG) with National Highways

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Date: June 2026

PINS reference: EN0110013

Document reference: APP/5.17 (Original)

Infrastructure Planning (Examination Procedure) Rules 2010





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1 Introduction

1.1 Overview

- 1.1.0 This Statement of Common Ground (SoCG) has been prepared as part of the application for a Development Consent Order (DCO) (the DCO Application) for The Drovers Solar Farm (the Scheme) made by The Drovers Solar Farm Limited (the Applicant) to the Secretary of State for Energy Security and Net Zero (SoS) pursuant to the Planning Act 2008.
- 1.1.1 SoCGs are an established means in the DCO consenting process, of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.
- 1.1.2 This SoCG has been produced to confirm to the Examining Authority (the ExA) where agreement has been reached between the parties, and where agreement has not yet been reached.

1.2 Parties to this Statement of Common Ground

- 1.2.0 This SoCG has been prepared by the Applicant and National Highways (NH).
- 1.2.1 Collectively, the Applicant and NH are referred to as ‘the parties.’

1.3 Purpose of this Document

- 1.3.0 This SoCG is a ‘live’ document and will be amended as the examination progresses, including as more information becomes available and as a result of ongoing discussions between the Applicant and NH, in order to enable a final version to be submitted to the ExA.
- 1.3.1 The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.

1.4 Terminology

- 1.4.0 This SoCG summarises the main topics covered and the status of the matter. The colour coding system used within the table in Section 4 has been outlined below.



Cell	Status
Green	Agreed – indicates where an issue has been resolved.
Yellow	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.
Red	Not Agreed – indicates a position where both parties have reached a final position that a matter cannot be agreed between them.



2 The Scheme

2.1 Scheme Description

- 2.1.0 The Scheme is a Nationally Significant Infrastructure Project (NSIP) for the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development comprising a Battery Energy Storage System (BESS), a Customer Substation and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50 megawatts (MW) Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.
- 2.1.1 The **Location Plan** [\[APP-007\]](#) shows the Order limits for the Scheme, which is approximately 840 hectares (ha) of land within Norfolk (the 'Order limits').



3 Record of Engagement

3.1 Summary of Engagement

- 3.1.0 The parties have been engaged in consultation since 16 October 2024.
- 3.1.1 A non-statutory consultation took place between 17 September and 1 October 2024. The statutory consultation process took place between 21 May and 9 July 2025.
- 3.1.2 The Applicant and NH have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has included discussions in relation to transport and access requirements, swept path analysis, potential off-site works at the A47 / A1065 junction, and submission documentation.
- 3.1.3 Table 3.1 shows a summary of key engagement that has taken place between the Applicant and NH in relation to the Application.

Table 3.1 – Record of Engagement

Date	Form of Correspondence	Sent by / received from	Key topics discussed and key outcomes
16/10/2024	Email Correspondence	VTP to NH	Briefing on the Scheme, alongside transport and access requirements including expected trips.
17/10/2024	Email Correspondence	NH to VTP	NH confirmed its position in relation to land interests, raised the requirement for a Road Safety Audit (RSA), and indicated that a Statement of Common Ground (SoCG) would likely be required.



18/12/2024	Email Correspondence	Project team to VTP	Scoping Opinion received from the Planning Inspectorate and circulated for review, including matters relevant to National Highways' interests.
07/01/2025	Email Correspondence	Project team to VTP	Scoping Opinion response table issued and responses coordinated, alongside PEIR chapter preparation.
25/07/2025	Email Correspondence	Protect team to VTP	Feedback on PEIR / statutory consultation material for the Environmental Statement circulated for review and response, including highways-related matters relevant to National Highways.
07/08/2025	Email Correspondence	VTP to NH	Swept path analysis and confirmation of potential works at A47 / A1065 junction.
13/11/2025	Email Correspondence	NH to VTP	Confirmation on nature of potential off-site works at A47 / A1065 junction and that any temporary works, Road Safety Audits, or technical approval could be confirmed post-consent via Abnormal Loads License by contractor.
08/12/2025	Email Correspondence	VTP to NH	Update on progress of submission and provision of DCO Application documents.
20/03/2026	Email Correspondence	Project team to VTP	Relevant Representations received and understood, and preparation of the Statements of Common Ground commenced.

3.1.4 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Applicant and NH in relation to the issues addressed in this SoCG.



4 Matters of Discussion

4.1 Overview

- 4.1.0 The following tables detail, by topic, the matters agreed, under discussion, or not agreed between the Applicant and NH at the point of this document being published.
- 4.1.1 Where discussions are ongoing, the parties will include an indication of the likelihood that disagreement will remain by the end of the examination in accordance with the **Rule 6 letter** [\[PD-006\]](#).



Table 4.1 – Planning and Overview

Reference	Topic	Consultee's Position	Applicant's Position	Status
NH3/NH4	Planning	NH notes that it is itself an active DCO promoter and understands the balance between scheme delivery and statutory consultee protections. NH considers the SRN deserves the same proportionate measure of protection. In this context, NH sets out seven minimum protection standards where there is potential for SRN impact: (a) being held harmless from third-party impacts; (b) adherence to NH network occupancy procedures; (c) NH certification and approval of highway works on completion; (d) financial provision against Applicant default; (e) indemnification for loss or damage; (f) prior approval from NH before exercising DCO powers in relation to the SRN; and (g) agreed emergency access procedures.	<p>The Applicant considers that the form of protective provisions for the benefit of NH in Part 4 of Schedule 15 of the draft DCO [APP/3.1.1] adequately protects the SRN.</p> <p>The Applicant notes the minimum standards proposed and confirms these are addressed in the protective provisions for the benefit of NH in Part 4 of Schedule 15 of the draft DCO [APP/3.1.1]. The Applicant further notes that NH has recently agreed to the form of protective provisions in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO and will discuss with NH whether the same approach can be agreed for this Scheme, in which case the draft DCO [APP/3.1.1] will be updated to mirror that wording.</p>	Under discussion
NH48	Planning	NH notes that the Authorised Development will interface with the SRN and requires the impact on the SRN to be assessed.	The Applicant acknowledges the interface with the SRN. ES Chapter 9: Transport and Access [APP/6.2.1] assesses the anticipated transport and access effects of the Scheme's construction, operation and decommissioning, and concludes that with the mitigation measures in place, secured through the oCTMP [APP/7.7.1] and oOTMP [APP/7.9.1] , there are no residual transport and access-related effects	Agreed



			expected across the Scheme's construction, operation and decommissioning phases.	
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Table 4.2 – Lands and Compulsory Acquisition

Reference	Topic	Consultee's Position	Applicant's Position	Status
NH2	Land	NH objects to the DCO on three grounds: (a) compulsory powers are sought over 8 NH land plots without NH's protective provisions, contravening ss.127 and 138 of the Planning Act 2008; (b) multiple DCO articles authorise interference with NH's statutory powers and the SRN without adequate control; and (c) insufficient information has been provided on proposed Work Nos. 1 and 11 affecting the SRN. NH will withdraw its objection subject to inclusion of its protective provisions.	The Applicant notes the grounds of objection and confirms it has included a form of protective provisions for the benefit of NH in Part 4 of Schedule 15 of the draft DCO [APP/3.1.1] . As NH has recently agreed to the form of protective provisions in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, the Applicant will discuss with NH whether the same approach is agreed for this Scheme and, if so, would update the draft DCO [APP/3.1.1] to mirror that wording. On compulsory acquisition, the Applicant refers to section 6 of its Statement of Reasons [APP-021] . The temporary highway works at the A47/A1065 junction for AIL delivery, secured through the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163] .	Under discussion
NH8	Lands	NH seeks further clarity on the purpose and reason for temporary possession of each of its 8 plots, noting the stated Purpose One is very wide and vague.	National Highways has been identified as having interests in relation to Plots 5-47, 5-49, 5-50, 5-51, 5-53, 5-54, 5-55 and 5-56, for which temporary possession is sought for Work No. 8A. This comprises temporary construction, maintenance and decommissioning access to Works Nos. 1, 2, 3, 6, 7, 9, 10 and 11, including	Agreed



			the creation of accesses from the public highway, visibility splays, temporary alterations to street or highway layout, and offsite works in connection with AIL movements.	
NH9	Lands	NH holds Category 2 rights in plot 5-47 and 5-54 by Deed of Exchange dated 17 December 1984. NH requires further details of the proposed works on this parcel and, if there are traffic management implications, requires prior consultation and NH's consent before works take place.	This consent requirement is included in the form of protective provisions in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO and the Applicant will therefore discuss with NH whether the same approach can be agreed for this Scheme, in which case the draft DCO [APP/3.1.1] will be updated to mirror that wording. The relevant works are temporary highway works at the A47/A1065 junction that may include verge reinforcement or temporary widening for future AIL delivery, as set out in the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163] . Works would be temporary, reinstated to original condition post-delivery, and confirmed to NH via the contractor as part of the AIL licence protocol and final Construction Traffic Management Plan.	Under discussion
NH10	Lands	NH is the Category 1 owner/occupier of plot 5-49, 5-50, and 5-55. NH requires further details of the proposed works and, if there are traffic management implications, prior consultation and NH's consent before works take place.	See the row above in relation to the consent requirement. The relevant works are temporary highway works at the A47/A1065 junction for AIL delivery, secured through the oCTMP [APP/7.7.1] and ES Appendix 9.2: Traffic Assessment [APP-163] , and to be confirmed to NH via the contractor as part of the AIL licence protocol.	Under discussion



NH17	Lands	NH requests confirmation as to whether it has an interest in any other plots beyond those identified.	The Applicant has identified all NH interests as set out in the Book of Reference [APP/4.3.2] and Land Plan [APP-008] .	Agreed
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Table 4.3 – Legal and DCO

Reference	Topic	Consultee’s Position	Applicant’s Position	Status
NH5	Legal	NH sets out comments on the protective provisions in the Applicant's draft DCO and considers that its proposed preferred protective provisions (at Appendix 1 of the RR) address those concerns. NH requests that these preferred protective provisions are included in the draft DCO at the next deadline in order to facilitate the withdrawal of its objection. NH provides full justification for each key provision and definition in the RR.	The Applicant agrees that a form of protective provisions for the benefit of NH is required on the face of the draft DCO [APP/3.1.1] to protect NH's interests and allay NH's concerns. The Applicant has included such provisions in Part 4 of Schedule 15 of the draft DCO [APP/3.1.1] . Noting NH has recently agreed to the form of protective provisions in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, the Applicant will discuss with NH whether the same approach is agreed for this Scheme and, if so, would update the draft DCO [APP/3.1.1] to mirror that wording.	Under discussion
NH37	Legal — Req. 3	NH should be given an opportunity to review any amendments to approved documents or plans under Requirement 3, to ensure changes do not adversely impact the SRN or any land relevant to NH. Further, NH requests that Requirement 15 of the DCO is amended from "in consultation with the relevant highway authority" to "in consultation with the relevant highway authority or authorities", reflecting NH's status as the highway authority for the SRN. NH also requests that Requirement 20 (Decommissioning Strategy) is amended to include NH as a named consultee alongside the relevant local planning authorities, given	The Applicant understands that an approach to consultation with NH under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with NH. Should that agreement be reached, the Applicant will discuss with NH whether the same approach is agreed for this Scheme and, if so, would update the draft DCO [APP/3.1.1] to replicate the relevant wording of those Requirements.	Under discussion



		NH's responsibility for the safe operation of the SRN.		
NH47	Legal — Sch. 16	NH is a requirement consultee under Schedule 16. NH objects to the 5 working day consultation period in paragraph 3(3) as insufficient, and to the deemed consent provision in paragraph 3(4) as disproportionate, as missing the window could result in NH not being able to comment. At least 28 days would be more reasonable.	The Applicant understands that an approach to the wording of paragraph 3 of Schedule 16 of the Green Hill Solar Farm DCO is nearly agreed with NH. Should that agreement be reached, the Applicant will discuss with NH whether the same approach is agreed for this Scheme and, if so, would update the draft DCO [APP/3.1.1] to replicate the relevant wording of this Schedule.	Under discussion

Table 4.4 – Transport and Access

Reference	Topic	Consultee's Position	Applicant's Position	Status
NH49	Traffic and Transport	NH would expect to see junction modelling undertaken for any junctions which exceed a 30 two-way vehicle impact along the strategic road network at the A47 during the AM and PM peak hours.	The Applicant confirms that construction vehicles will be restricted to avoid the AM and PM peak periods, as secured through the oCTMP [APP/7.7.1] , ensuring there are no material impacts during the AM and PM peak hours. In addition, the oCTMP [APP/7.7.1] confirms that construction staff will primarily arrive before and depart after the peak periods, meaning there is unlikely to be any conflict with the SRN peak network periods.	Agreed
NH50	Traffic and Transport	NH would expect for the oCEMP [APP-186] to include further details on the monitoring regime and enforcement protocols to appropriately mitigate against the	The Applicant accepts NH's comment and has updated the oCTMP [APP/7.7.1] at Deadline 1 to include additional detail on the monitoring and enforcement regime for construction vehicles. It is considered that this is the more appropriate	Agreed



		construction impacts associated with construction vehicles.	control document than the oCEMP [APP/7.6.1] as it relates to construction vehicles.	
NH51	Traffic and Transport	<p>NH has requested further detail on the consideration of sustainable travel and requires a Travel Plan to form part of the submission documentation.</p> <p>NH echoed the request for more detail on the control measures for monitoring and enforcement for corrective measures in the event that the construction strategy set out within the oCEMP and oCTMP are not adhered to, to ensure the SRN is not compromised.</p>	<p>The Applicant has prepared an Outline Travel Plan as an appendix to the updated oCTMP [APP/7.7.1] for discussion with NH.</p> <p>The oCTMP [APP/7.7.1] has been updated at Deadline 1 to include additional detail on the monitoring and enforcement protocol for construction vehicles and will be subject to further discussion with NH on the relevant measures.</p>	Under discussion
NH52	Traffic and Transport	NH propose that any temporary signage or works would require a Road Safety Audit.	The matter is agreed and it is accepted that the Road Safety Audit is secured via the updated oCTMP [APP/7.7.1] , being undertaken prior to commencement of construction once the works are known.	Agreed
NH53	Traffic and Transport	NH provided additional input on the scope of condition survey to include the junctions on the A47.	The NH comment is accepted and has been incorporated into the updated oCTMP [APP/7.7.1] at Deadline 1.	Agreed
NH54	Traffic and Transport	NH noted that any increase in vehicle trips during construction or as part of the final Construction Traffic Management Plan, above what is presented within the oCTMP [APP-187] , would require further assessment.	The Applicant accepts this comment and it is expected that the cap of vehicles would be secured through the oCTMP [APP/7.7.1] . The contractor would not be able to exceed this threshold without prior agreement with the relevant authorities, including NH.	Agreed



NH55/NH56	Traffic and Transport	NH request additional reassurance that the application includes measures within the oCTMP and Outline Travel Plan are appropriately enforced and remedial measures if not implemented.	The oCTMP [APP/7.7.1] has been updated to include additional detail on the monitoring and enforcement protocol for construction vehicles and will be subject to further discussion with NH on the relevant measures.	Under discussion
NH58/NH59	Traffic and Transport	NH note that any Abnormal Indivisible Load deliveries would be subject to the ESDAL system, with associated timescales for notification and that whilst the provisional routing included in the DCO is acceptable, the final routing is to be agreed prior to commencement.	The NH response is noted and secured through the updated oCTMP [APP/7.7.1] .	Agreed
NH60	Traffic and Transport	NH comment on the minor works required at the A47 / A1065 junction required to facilitate the Abnormal Indivisible Load (AIL) deliveries, which would require a Road Safety Audit and Technical Approval via Detailed Design.	The NH response is noted and secured through the updated oCTMP [APP/7.7.1] .	Agreed



Table 4.5 – Consultation

Reference	Topic	Consultee's Position	Applicant's Position	Status
NH83	Consultation	NH confirms it will respond to any written questions the Examining Authority may have and is willing to attend an appropriate hearing to detail the impacts of the Authorised Development on the SRN.	The Applicant notes this comment and thanks National Highways for its representation.	Agreed



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