

The Drovers Solar Farm

Statement of Common Ground (SoCG) with Borough Council of King's Lynn and West Norfolk

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Contents

<u>1</u>	<u>Introduction.....</u>	<u>1</u>
1.1	Overview.....	1
1.2	Parties to this Statement of Common Ground.....	1
1.3	Purpose of this Document.....	1
1.4	Terminology.....	1
<u>2</u>	<u>The Scheme.....</u>	<u>3</u>
2.1	Scheme Description.....	3
<u>3</u>	<u>Record of Engagement.....</u>	<u>4</u>
3.1	Summary of Engagement.....	4
<u>4</u>	<u>Matters of Discussion.....</u>	<u>5</u>
4.1	Overview.....	5



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 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.
- 1.1.2 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 Borough Council of King’s Lynn & West Norfolk (KLWN).
- 1.2.2 Collectively, the Applicant and KLWN 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 KLWN, 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 100 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** [\[APP-007\]](#) 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 KLWN have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has consisted of regular Microsoft Teams meetings.
- 3.1.4 **Table 3.1** shows a summary of key engagement that has taken place between the Applicant and KLWN in relation to the DCO Application.

Table 3.1 – Record of Engagement

Date	Form of Correspondence	Key topics discussed and key outcomes
19/09/2024	Teams Meeting	<ul style="list-style-type: none">Briefing and introduction to the Scheme.
20/01/2025	Teams Meeting	<ul style="list-style-type: none">Meeting to discuss the Landscape and Visual Impact Assessment, viewpoint locations and cultural heritage setting.Stakeholders expressed support for the overall approach, which informed the Preliminary Environmental Information Report (PEIR).
03/03/2025	Teams Meeting	<ul style="list-style-type: none">Employment and Skills Workshop.Stakeholders supported the approach and proposed a number of additional skills and initiatives for the final strategy.
30/05/2025	Group Site Visit	<ul style="list-style-type: none">Group Site visit led by the applicant with stakeholders from local councils and community groups, including representatives from KLWN.The applicant led the group to a series of viewpoints to discuss potential visibility of the Scheme, presenting the PEIR visualisations and Photopanel as visual aids.Discussion around potential siting of proposed development included within the PEIR, particularly around the potential removal of proposed National Grid and



		Customer Substations from Field 35, which was subsequently actioned.
20/08/2025	Teams Meeting	<ul style="list-style-type: none">• Introducing the Scheme to Julie Barrow.• Cost Recovery.
21/08/2025	Teams Meeting	<ul style="list-style-type: none">• Scheme update.• Summary of changes covered in targeted consultation.

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

4 Matters of Discussion

4.1 Overview

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

4.1.2 Where discussions are ongoing, the Applicant has included 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 1 – Cultural Heritage / Historic Environment

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 1-1	Key Views	The Borough Council disagrees that the main views from Castle Acre's Castle are only to the east and west. The River Nar lies to the southeast, and looking over the bailey towards the river gives clear views of both the application site and Bartholomew's Plantation. This is mainly because the land slopes down to the river and rises again on the opposite side of the valley towards the site.	Both the ES Chapter 8: Cultural Heritage and Archaeology [APP-057] and ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152] are clear that the topographic location of the castle in relation to the river valley, which includes elements to the east and west along with elements to the south, contribute to the significance of the monument. However, the parts of the Site that are visible from the monument (e.g. Bartholomew's Plantation and the fields to its north) do not contain elements that are considered 'key' to the understanding and appreciation of the monument. As such, the Site is not considered to make the same level of contribution to the significance of the Castle as other elements of its setting.	High
KLWN 1-2	Key Views	The Applicant has worked with the Borough Council's planning and heritage teams to reduce harm as much as possible. Moving the substations out of direct view from Castle Acre and placing them south of Bartholomew's Hill Plantation would not eliminate harm but would filter views and lessen visual impact. Removing solar PV from the northern part of field 33 is also positive, as the topography means the remaining panels would sit beyond the crest and be barely visible.	There is no anticipated substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme. ES Chapter 8: Cultural Heritage and Archaeology [APP-057] outlines that 'substantial harm' is afforded to any adverse effect that is of a major magnitude, whilst moderate, minor or negligible adverse effects represent effects that are of 'less than substantial harm' in nature. As detailed in the submitted visualisations (ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [AS-039] and ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]), the National Grid	Medium



			Substation and the Customer Substation will be entirely screened by Bartholemew's Plantation in views from the north, thereby removing, rather than reducing, visual impact. As described in ES Chapter 8: Cultural Heritage and Archaeology [APP-057] , new pylons will be visible, but not other elements of the National Grid Substation and the Customer Substation.	
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Table 2 – Landscape and Visual

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 2-1	Substation design	The design of the substation and its infrastructure needs to be considered so that the highest parts are screened as far as possible by the plantation and should not be on its edges.	<p>The ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme and ES Chapter 8: Cultural Heritage and Archaeology [APP-057] assesses impacts upon heritage assets as a result of the Scheme. Mitigation measures embedded into the Scheme have sought to ensure that potential visibility of the proposed larger elements of the Scheme, such as the National Grid and Customer substations, are screened as much as possible through new tree, woodland and hedgerow planting. The exact detail and design of the Customer and National Grid Substations will be considered fully at the detailed design stage.</p> <p>Such 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 oOEMP [APP/7.8.1] and the oLEMP [APP/7.11.1].</p>	Medium



KLWN 2-2	Lighting	Care still needs to be taken in the lighting and boundary treatment of the infrastructure which still has the ability to be impactful in this landscape.	<p>The ES Chapter 6: Landscape and Visual [AS-016] outlines potential landscape and visual impacts as a result of the Scheme, para 6.7.23 states “With regard to the consideration of lighting and subsequent mitigation measures, it is not considered likely that that the Scheme would result in any significant effects.”</p> <p>through additional lighting. The Design Principles, Parameters and Commitments [APP/5.8.1] confirms that “<i>The Solar arrays will not be lit during the operational phase</i>”. The Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation and within the BESS compound, which would only include motion sensing lighting and be used to maintain safe working conditions in winter months, security purposes, and maintenance activities as detailed within the oOEMP [APP/7.8.1] and ES Chapter 5: The Scheme [6.1.2]. Given the nature of these activities, it is not anticipated that there will be continuous flashing on and off of these lights. Lighting is not required within the Solar PV Site during the operational phase of the Scheme, with the exception of when panels could be cleaned at night, which may require lighting.</p>	Low
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Table 3 – Ecology and Biodiversity

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 3-1	BNG Metric	The BNG Metric should be updated to reflect the October 2025 publication of Local Nature Recovery Strategy – this is	Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report	Low



		<p>noted in the BNG report. This will affect all trees recorded in the baseline and the other neutral grassland being created post-development.</p> <p>The Biodiversity Net Gain Report identifies 37 veteran trees, but this is not reflected in the BNG Metric's User Comments and should be added for clarity. The report notes that these veterans were identified through the Arboricultural survey; however, arboriculturists use different criteria from the Environment Act, which applies a lower threshold for veteran status. An ecologist should verify the number of veteran trees on site to ensure none have been overlooked.</p>	<p>[APP/7.4.1], using the government metric and associated guidance.</p> <p>The Applicant can confirm the number of veteran trees (along with their individual references) has been added into the user comments within the updated BNG metric submitted at Deadline 1. In relation to BNG, the presence of individual veteran trees has been confirmed by Aspect Ecology in line with the definitions set out in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. Reference to the Arboricultural Impact Assessment is provided in order to allow comparison and cross-referencing of individual trees and to ensure consistency</p> <p>As noted, the Norfolk LNRS was published in October 2025 following the initial assessment and accordingly, as noted within the submitted Biodiversity Net Gain Assessment Report [APP/7.4.1], the assessment has been updated at Deadline 1.</p>	
KLWN 3-2	Bats	<p>Comments received within Relevant Representations acknowledge the bat survey work undertaken but raise concerns regarding the level of detail within the analysis reported.</p>	<p>The Applicant considers that the analysis undertaken is sufficient in order to adequately assess the potential impacts on bats as a result of the Scheme, and the information provided (ES Appendix 7.2: Baseline Ecological Survey Report [APP-148] and ES Chapter 7: Ecology and Biodiversity [APP/6.2.1]) demonstrates that the key corridors and areas will remain unlit and strengthened with additional planting (as secured by the oLEMP [7.11.1]).</p> <p>Nonetheless, further clarification in regard to important features and corridors through the Site can be worked up in order to further progress discussions with the</p>	Low



			Council and other consultees with a view to overcoming the concerns raised.	
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Table 4 – Land Use / Agriculture

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 4-1	BMV Land	<p>This Scheme would result in approximately 55% of the site falling within the definition of Best and Most Versatile (BMV) agricultural land. Whilst the 60 year decommissioning timeframe set out by Requirement 20 is noted, the loss of BMV, particularly in combination with other schemes across Norfolk as a whole is a concern for the Borough Council.</p>	<p>The effects on land of BMV quality, and the small areas adversely affected, are set out in ES Chapter 11: Soils and Agriculture [AS-018]. There is no policy that requires agricultural land of BMV or non-BMV quality to be farmed, and the implications for food production and the local land-based economy are set out in ES Chapter 11: Soils and Agriculture [AS-018] sections 11.8 and 11.11.</p> <p>ES Chapter 11: Soils and Agriculture [AS-018] concludes that, with embedded and additional mitigation measures in place, the Scheme itself would not result in any significant adverse effects on soil or agricultural land resources throughout its lifecycle. There will be some permanent land take associated with the National Grid Substation and Grid Connection Infrastructure, but this only amounts to less than 5 ha of BMV land. A worst-case assessment is also set out should the BESS and Customer substation not be restored. The loss in that case would exceed 20 ha, but even with woodland planting it would amount to 27ha of BMV (11.8.52).</p> <p>In terms of cumulative effects, four NSIP schemes were identified near the Scheme, two of which were for solar development, and these are assessed in Chapter 11 and listed in Table 11-10. At the time of the ES, limited information about the ALC grading was known, but in</p>	High



			respect of land loss (as distinct from land use) the adverse effects were considered to be limited. Cumulatively, however, there is the potential for the loss of more than 20ha of BMV as a result of these schemes and as reported in paragraph 11.11.15 the cumulative effect is therefore recorded as significant.	
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Table 5 – Transport and Access

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 5-1	Access	Whilst the site could be accessed via the A1065 from the north, the minimal level of traffic indicated as likely from this direction, plus the controlled site/delivery hours, would mitigate traffic noise impacts.	The Applicant notes that the Borough Council has agreed with the proposed site access. The routing for HGVs as presented in the oCTMP [APP/7.7.1] will be secured by way of a requirement in the DCO to ensure that the traffic impacts remain appropriately mitigated. ES Chapter 10: Noise and Vibration [APP-059] concludes traffic noise effects to be not significant based on the HGV routes and delivery hours as detailed in the oCTMP [APP/7.7.1] . The routes and delivery hours will be detailed in the CTMP and secured by way of a requirement in the draft DCO [APP/3.1.1] .	Agreed
KLWN 5-2	Construction Traffic	The site includes several public recreational routes that connect to or pass through the KLWN area and can be used by residents. These include the Rebellion Way Cycle Route, Castle Acre Circular Walk, and the Peddars Way and Norfolk Coast Path National Trail.	The Applicant notes that the Borough Council has agreed with the proposed construction access. The mitigation measures for construction traffic as presented in the oCTMP [APP/7.7.1] will be secured by way of a requirement in the DCO to ensure that the traffic impacts remain appropriately mitigated.	Agreed.



		Banksmen will be present where construction traffic crosses these routes to warn users of vehicle movements, stop construction traffic when necessary, and allow the public to pass safely through gated crossing points. Construction noise may be experienced by route users, but this will be brief and temporary while they pass through the area and is not considered a concern.		
KLWN 5-3	Dust	The wheel washing facilities and Dust Management Plan secured in the oCTMP and oOEMP mean that dust from vehicles leaving the site will be minimal, and the surrounding road network is unlikely to generate dust that could affect nearby homes. Given the distance between the site and residential areas, and that dust is mainly limited to internal haul and access roads, the Borough Council confirms that it has no concerns over dust amenity impacts.	The Applicant notes that the Borough Council has no concerns regarding dust amenity. Appendix 1: Construction and Decommissioning Phase Dust Assessment has been produced to determine the level of mitigation required to control dust and particulate matter emission for inclusion in the oCEMP [APP-186] submitted as part of the DCO Application. Dust emissions associated with construction activities will be controlled through mitigation measures outlined in the oCEMP [APP/7.6.1] . With the inclusion of the mitigation outlined in the oCEMP [APP/7.6.1] and the oDS [APP/7.10.1] , potential dust emissions associated with on-site activities during the construction and decommissioning phases are not anticipated to be significant.	Agreed



Table 6- Cumulative Assessment

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 6-1	Methodology of Assessment	KLWN agrees with the methodology applied to the cumulative assessment within the ES	The parties are in agreement with the point outlined.	Agreed
KLWN 6-2	List of Committed Developments	KLWN agrees with the list of committed developments included within the ES cumulative assessment	The parties are in agreement with the point outlined.	Agreed.



THE DROVES
SOLAR FARM