

The Drovers Solar Farm

Statement of Commonality (Tracked)

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Contents

<u>1</u>	<u>Introduction.....</u>	<u>1</u>
1.1	Overview.....	1
1.2	Structure of the Statement of Commonality.....	1
<u>2</u>	<u>Position.....</u>	<u>2</u>
2.1	Structure of the SoCGs.....	2
2.2	List of SoCGs	2
<u>3</u>	<u>Current Status of SoCGs</u>	<u>4</u>
3.1	Summary of Current Position	4
<u>4</u>	<u>Summary</u>	<u>97</u>



1 Introduction

1.1 Overview

1.1.1 This Statement of Commonality 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](#) This document provides the Examining Authority (the ExA) with the latest position on the Statements of Common Ground (SoCG) between the Applicant and relevant consultees and Interested Parties in relation to the Scheme. This Statement of Commonality will be updated at each Deadline throughout the course of the Examination, as a record of progress being made with the SoCG parties.

~~1.1.2~~ [1.1.3](#) This document has been updated at Deadline 3 to reflect the latest positions of the Statements of Common Ground submitted at this Deadline. The document references have not been updated from the original submission. Please refer to the [Guide to the Application \[APP/1.3.4\]](#) for the list of current versions of documents.

1.2 Structure of the Statement of Commonality

1.2.1 This Statement of Commonality document is structured as follows:

- Section 2 details the structure of each SoCG document and provides a list of the SoCGs that have being produced to date;
- Section 3 addresses the current status of each SoCG; and
- Section 4 sets out the commonality between topics covered in SoCGs.



2 Position

2.1 Structure of the SoCGs

- 2.1.1 Each SoCG adopts a standard format to ensure consistency in the approach taken to documenting the matters agreed, matters subject to ongoing discussion, or matters that are not agreed upon.
- 2.1.2 Each of the SoCGs are structured in the following way:
- Section 1 provides an introduction to the SoCG, including a description of the document and the relevant SoCG party;
 - Section 2 provides a description of the Scheme;
 - Section 3 provides a summary of engagement between the Applicant and the relevant party so far; and
 - Section 4 details those matters agreed, those matters under discussion and those matters which have not been agreed.

2.2 List of SoCGs

- 2.2.1. Following continuous and ongoing engagement with relevant statutory and non-statutory consultees, the Applicant ~~has prepared 11~~ eleven SoCGs which were submitted at Deadline 1. As outlined within ~~Section 3~~ the Deadline 2 Cover Letter [REP2-001], ~~the a~~ twelfth SoCG with Breckland Council ~~will have been submitted~~ was promised for submission at Deadline ~~32 (as agreed)~~ which the Applicant has now provided. A number of SoCGs that were submitted at Deadline 1 have also been updated at Deadline 3. This is reflected in the updated list of SoCGs below:

- SoCG with Breckland Council [APP/5.11];
- SoCG with Norfolk County Council [APP/5.12.1];
- SoCG with Environment Agency [APP/5.13.1];
- SoCG with Historic England [APP/5.14];
- SoCG with Natural England [APP/5.15.1];
- SoCG with National Grid Electricity Transmission Plc [APP/5.16];
- SoCG with National Highways [APP/5.17];



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- SoCG with Anglian Water Services Limited [APP/5.18];
 - SoCG with Norfolk Wildlife Trust [APP/5.19];
 - SoCG with Borough Council of King's Lynn and West Norfolk [APP/5.20.1];
 - SoCG with National Energy System Operator Limited (NESO) [APP/5.21]; and
 - SoCG with Defence Infrastructure Organisation [APP/5.22].



3 Current Status of SoCGs

3.1 Summary of Current Position

3.1.1 This section confirms the current status of each SoCG at Deadline [34](#).

[3.1.2](#) Table 3.1 provides a high-level position on the status of each SoCG and, where necessary, includes further detail to aid the understanding of the status.

~~3.1.2~~[3.1.3](#) Item 1 of Annex F, as contained within the Rule 6 Letter [\[PD-006\]](#), requests that the Applicant summarises “*when it is anticipated that any draft Statements of Common Ground will be finalised and when the finalised signed and dated copies will be submitted to the examination*”. The Applicant considers that a response to this request is difficult to precisely quantify, as the finalisation of each SoCG relies upon reaching full agreement with each corresponding party. However, the Applicant can confirm that good progress is being made with regard to each of the SoCGs and, therefore, the Applicant is confident that all SoCGs will be agreed and finalised before the close of the Examination.

~~3.1.3~~[3.1.4](#) The terms used in **Table 3.1** are as follows:

- Final SoCG – the SoCG has been agreed upon by both parties, with no outstanding matters to resolve.
- Draft SoCG – the SoCG has been discussed between both parties but there are a number of issues still outstanding and are yet to be signed off on.
- Initial SoCG – the SoCG has been drafted by the Applicant (using matters identified from meetings with the party alongside responses to Statutory Consultation and Relevant Representations) and is with the consultee for review. This initial draft has not yet had feedback from the consultee and is therefore not signed off.
- Not yet submitted – the Applicant is progressing these SoCGs with the intent to submit drafts at subsequent deadlines.

Table 3.1 – Current Status of SoCGs

Document Ref.	Relevant Party	Position at Deadline 34
APP/5.11	Breckland Council (BC)	Not yet submitted. As confirmed in the Applicant's Deadline 2 Cover Letter [REP2-001], the draft SoCG was not in a position to benefit the examination at Deadline 2 and so it was instead confirmed that the draft SoCG would be submitted at Deadline 3 instead. Breckland Council has confirmed with the Applicant that they are focusing on the Local Impact Report (LIR) for Deadline 1



Document Ref.	Relevant Party	Position at Deadline 34
		and therefore it has been agreed between the parties that a draft SoCG will be submitted at Deadline 2. <u>A Draft SoCG has been submitted at Deadline 3.</u> <u>In line with Annex F of the Rule 6 Letter [PD-006], the Applicant notes the main outstanding point relates to landscape and visual matters. BC are currently reviewing the Technical Information Note – Landscape and Visual [APP/8.18] which has been submitted by the Applicant at Deadline 3. The Applicant provided a working draft of this note to BC on 21 July 2026 which means that there has been insufficient time for BC to review this document into Deadline 3. As such, commentary on certain landscape and visual matters has been withheld within this SoCG whilst BC continue their review this document. The Applicant and BC have agreed that it may be possible to submit a further revised SoCG in the period between Deadlines 3 and 4, for the benefit of the hearings in September. Both the Applicant and BC recognise that the acceptance of a revised SoCG between these deadlines will be at the discretion of the ExA.</u> <u>Other outstanding matters relate to cumulative impacts, land use and agriculture, community benefit, glint and glare and amenity, ecology and biodiversity, the draft DCO, and grid connection matters. The Applicant and BC are actively engaging to resolve these matters</u>
APP/5.12.1	Norfolk County Council (NCC)	An Initial SoCG has been submitted. It was agreed with NCC on 28 May 2026 to submit the Initial SoCG without NCC's engagement received as they have been focussing on their LIR for Deadline 1. The ExA's request within Annex H of the Rule 6 Letter [PD-006], to provide information on the likelihood of resolution on each matter, is therefore not yet included within this version. The Applicant will aim to work with NCC to provide this information for Deadline 2. <u>A revised SoCG has been submitted at Deadline 3, further to the initial SoCG provided at Deadline 1.</u> <u>NCC's Natural Environment Team has not been able to provide comments on matters of landscape and visual and ecology and biodiversity. Notwithstanding this, the Applicant and NCC have agreed to submit the SoCG without these comments informing the SoCG with an agreed view that it may be possible to submit a further revised SoCG in the period between Deadlines 3 and 4, for the benefit of the</u>



Document Ref.	Relevant Party	Position at Deadline ³⁴
		<u>hearings in September. Both the Applicant and NCC recognise that the acceptance of a revised SoCG between these deadlines will be at the discretion of the ExA.</u> <u>In line with Annex F of the Rule 6 Letter [PD-006], the Applicant notes the main outstanding concerns held by NCC are in relation to the cumulative methodology and the long and short lists, landscape and visual, glint and glare, water, flood risk and drainage and ecology and biodiversity matters. The Applicant is continuing to reach agreement with NCC on these matters.</u>
APP/5.13. ¹	Environment Agency (EA)	A Draft SoCG has been submitted. <u>The Applicant has submitted a revised SoCG at Deadline 3, further to the initial SoCG provided at Deadline 1.</u> <u>In line with Annex F of the Rule 6 Letter [PD-006], the Applicant notes the main outstanding concerns relate to water, flood risk and drainage matters. The Applicant is continuing to reach agreement with the EA on these matters.</u>
APP/5.14	Historic England (HE)	A Draft SoCG has <u>was</u> been submitted <u>at Deadline 1</u>. The ExA's request within Annex H of the Rule 6 Letter [PD-006], to provide information on the likelihood of resolution on each matter, is not yet included within this version, as the parties are still discussing these matters. The Applicant will aim to work with HE to provide this information at a subsequent deadline.
APP/5.15. ¹	Natural England (NE)	A Draft SoCG has been submitted. <u>The Applicant has submitted a revised SoCG at Deadline 3, further to the initial SoCG provided at Deadline 1.</u> <u>In line with Annex F of the Rule 6 Letter [PD-006], the Applicant notes the main outstanding concerns relate to land use and agriculture matters. The Applicant is continuing to reach agreement with NE on these matters.</u>
APP/5.16	National Grid Electricity Transmission Plc (NGET)	An Initial SoCG has been <u>was</u> submitted <u>at Deadline 1</u>. This Initial SoCG was issued to the stakeholder on 5 May 2026. The Applicant has not yet received a response to this <u>Initial SoCG</u>, though the Applicant's lawyers and NGET's lawyers <u>have been engaging on a form of protective provisions</u>.



Document Ref.	Relevant Party	Position at Deadline ³⁴
		The ExA's request within Annex H of the Rule 6 Letter [PD-006] , to provide information on the likelihood of resolution on each matter, is therefore not yet included within this version. The Applicant will aim to work with NGET to provide this information at a subsequent deadline.
APP/5.17	National Highways (NH)	An Initial SoCG has been<u>was</u> submitted <u>at Deadline 1</u>. This Initial SoCG was issued to the stakeholder on 1 May 2026. The Applicant <u>and NH are working through comments on the Initial SoCG. The Initial SoCG is not considered suitably advanced for it to yet be beneficial for submission of a revised version in Examination</u>has not yet received a response to this. The ExA's request within Annex H of the Rule 6 Letter [PD-006], to provide information on the likelihood of resolution on each matter, is therefore not yet included within this version. The Applicant will aim to work with NH to provide this information at a subsequent deadline.
APP/5.18	Anglian Water Services Ltd (AW)	A Draft SoCG has been<u>was</u> submitted <u>at Deadline 1</u>. <u>The ExA's request within Annex H of the Rule 6 Letter [PD-006], to provide information on the likelihood of resolution on each matter, is not yet included within this version, as the parties are still discussing these matters. The Applicant will aim to work with AW to provide this information at a subsequent deadline.</u>
APP/5.19	Norfolk Wildlife Trust (NWT)	A Draft SoCG has been<u>was</u> submitted <u>at Deadline 1</u>. The ExA's request within Annex H of the Rule 6 Letter [PD-006], to provide information on the likelihood of resolution on each matter, is not yet included within this version, as the parties are still discussing these matters. The Applicant will aim to work with NWT to provide this information at a subsequent deadline.
APP/5.20 ¹	Borough Council of King's Lynn and West Norfolk (BCKLWN)	A Draft SoCG has been submitted. The ExA's request within Annex H of the Rule 6 Letter [PD-006], to provide information on the likelihood of resolution on each matter, is included. The Applicant has completed the likelihood of resolution based on their position on each matter, but this has not been reviewed by BCKLWN for this submission. The Applicant will continue to work with BCKLWN to update this position at a subsequent deadline.



Document Ref.	Relevant Party	Position at Deadline 3 ⁴
		<u>The Applicant has submitted a revised SoCG at Deadline 3, following the Draft SoCG provided at Deadline 1.</u> <u>In line with Annex F of the Rule 6 Letter [PD-006], the Applicant notes the main outstanding concerns held by BCKLWN relate to skylark mitigation, impacts on RAF Marham, and some details and definitions contained within the draft DCO. The Applicant and BCKLWN are actively engaging to resolve these matters.</u>
APP/5.21	National Energy System Operator Ltd	A Draft SoCG has been^{was} submitted <u>at Deadline 1.</u> The ExA's request within Annex H of the Rule 6 Letter [PD-006], to provide information on the likelihood of resolution on each matter, is not yet included within this version, as the parties are still discussing these matters. The Applicant will aim to work with NESO to provide this information at a subsequent deadline.
APP/5.22	Defence Infrastructure Organisation	A Draft SoCG has been^{was} submitted <u>at Deadline 1. The Applicant has not yet received a response to this.</u>



4 Summary

- 4.1.1 This section provides a summary of the main topics covered by the SoCGs submitted at Deadline [34](#) and identifies where there is commonality in topics between the SoCG parties.
- 4.1.2 **Table 4.1** has been produced to set out the topics covered across the SoCGs and the status of the matter at the submission stage with the relevant party. The colour coding used within this **Table 4.1** is outlined below.
- 4.1.3 The colours of each cell correspond to the status table in each individual SoCG.

Cell	Status
	Agreed
	Subject to further discussion
	Currently subject to disagreement
	Not Applicable



Table 4.1 – Summary of Commonality with relevant stakeholders

Document Ref.	Party	Topics																										
		Planning Policy	BESS/ Fire Safety	Cumulative Impacts	Location of the Substation	Cultural Heritage / Historic Environment	Aerodrome Height Safeguarding	Land Use / Agriculture	Consultation	Construction	Glint and Glare	Precision Approach Radar	Landscape and Visual	PRoW and Permissive Footpaths	Traffic and Transport	Bird Strike Safeguarding	Water, Flood Risk & Drainage	Waste Management	Decommissioning	Lands and Compulsory Acquisition	Draft DCO	Impact on existing apparatus/infrastructure	Land contamination	Ecology and Biodiversity	Population/Economic Impacts	Grid Connection	Design	Approach to EIA
APP/5.11	Breckland Council																											
APP/5.12_1	Norfolk County Council																											
APP/5.13_1	Environment Agency																											
APP/5.14	Historic England																											
APP/5.15_1	Natural England																											
APP/5.16	National Grid Electricity Transmission Plc																											
APP/5.17	National Highways																											
APP/5.18	Anglian Water Services Ltd																											



Document Ref.	Party	Topics																											
		Planning Policy	BESS/ Fire Safety	Cumulative Impacts	Location of the Substation	Cultural Heritage / Historic Environment	Aerodrome Height Safeguarding	Land Use / Agriculture	Consultation	Construction	Glint and Glare	Precision Approach Radar	Landscape and Visual	PRoW and Permissive Footpaths	Traffic and Transport	Bird Strike Safeguarding	Water, Flood Risk & Drainage	Waste Management	Decommissioning	Lands and Compulsory Acquisition	Draft DCO	Impact on existing apparatus/infrastructure	Land contamination	Ecology and Biodiversity	Population/Economic Impacts	Grid Connection	Design	Approach to EIA	Community Benefit
APP/5.19	Norfolk Wildlife Trust																												
APP/5.20.1	Borough Council of King's Lynn and West Norfolk																												
APP/5.21	National Energy System Operator Limited																												
APP/5.22	Defence Infrastructure Organisation																												



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