

The Drovers Solar Farm

Statement of Common Ground (SoCG) with Breckland Council

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Date: July 2026

PINS reference: EN0110013

Document reference: APP/5.11 (Original)

Infrastructure Planning (Examination Procedure) Rules 2010





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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 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 (PA2008).
- 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 in consultation with Breckland Council (BC).
- 1.2.2 Collectively, the Applicant and BC 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 Breckland Council, 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.

Terminology

- 1.3.3 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 29 October 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 Breckland Council have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has consisted of monthly planning catch-up meetings.
- 3.1.4 Table 1 shows a summary of key engagement that has taken place between the Applicant and Breckland Council 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.
26/11/2024	Monthly Planning Catch-Up Meeting	• The publishing of workshop summary report. • Drafting of Statement of Community Consultation. • Agricultural Land Classification grading process.
04/01/2025	Monthly Planning Catch-Up Meeting	• Preliminary Environmental Information Report (PEIR) state programme. • Statutory Consultation updates, and arrangement of site visit.
03/03/2025	Teams Meeting	• Meeting brought together skills leads and FE partners to inform the development of the Employment and Skills Strategy.



		Stakeholders supported the approach and proposed a number of additional skills and initiatives for the final strategy.
18/03/2025	Teams Meeting	Meeting to discuss the Applicant's tourism accommodation and assets analysis. Breckland District Council welcomed the work to date and offered suggestions for contacts and potential improvements.
29/04/2025	Monthly Planning Catch-Up Meeting	- Design update and introduction to design principles. - Percentage of best and most versatile (BMV) land use. - Introduction to the strategies underpinning the concept masterplan (placemaking, access and biodiversity). - Location and delivery of National Grid Substation.
03/06/2025	Monthly Planning Catch-Up Meeting	- Statutory Consultation updates. - Planning policy updates including the implications of PA2008 reforms and CP30.
29/07/2025	Monthly Planning Catch-Up Meeting	- Cumulative impact of solar farm applications. - Statutory Consultation summary and debrief. - Sharing that a targeted consultation will take place.
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 Adequacy of Consultation Milestone with the Planning Inspectorate (PINS) and the Local planning Authorities (LPA). - Submission programme.



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.
30/06/2026	Meeting to discuss SoCG BC external consultant landscape comments	• Additional viewpoints and visuals requested by the LPA • Future Baseline consideration • Cumulative scope and approach • Local Landscape Character Areas • Judgements

3.1.5 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Applicant and Breckland Council 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 Breckland Council at the point of this document being published.
- 4.1.2 Where discussions are ongoing, the parties have 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 – Cumulative Impact

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 1-1	Cumulative Effects	The Council accepts the Applicant's position that only one development, High Grove Solar, has the potential to result in significant cumulative effects on Landscape and Visual within the associated Landscape and Visual Impact Assessment (LVIA) Study Area. However, the Council considers the scope of the cumulative assessment needs to be amended to consider the wider impacts of renewable energy development across Norfolk. The Council wishes to reiterate the following request that was made as part of the Stat Consultation and Relevant Reps (and rejected by the applicant): It is requested that the Examining Authority (ExA) implement a mechanism akin to those used for solar projects in other parts of the country (e.g. western Lincolnshire and the Outer Dowsing offshore wind proposal). This mechanism mandates that the applicant produces an inter-relationship report at the outset of their examination and update it at each subsequent deadline. Such a report is expected to enhance understanding of scheme interactions and the	The Applicant welcomes this confirmation that only one development, High Grove Solar, has the potential to result in significant cumulative effects on Landscape and Visual within the associated Landscape and Visual Impact Assessment (LVIA) Study Area. The Applicant is submitting an updated Report on Interrelationships between Projects [APP/8.3.1] at Deadline 3 which sets out how the two projects have collaborated and control measures put in place within the DCO documentation. The Applicant would also note that the High Grove Solar Farm will be required to undertake a comprehensive cumulative impact assessment as part of the Environmental Impact Assessment to support their DCO Application. The Environmental Statement accompanying the High Grove DCO application will present the cumulative assessment based upon the detail set out in the Scheme's DCO Application and the detail of the High Grove Solar Farm, along with any further mitigation measures if required.	Low/Medium



		cumulative impact of development within the locality. This is considered especially necessary given that the High Grove DCO is yet to be submitted. As such, there is no certainty regarding potential cumulative impacts at this stage.		
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Table 2 – Land Use / Agriculture

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 2-1	Permanent Infrastructure	The National Grid substation is proposed to be located within Field 27 which includes Grade 2 ALC. The Council considers that permanent infrastructure should be sited on the lowest quality agricultural land within the Order Limits.	In respect of the siting of the National Grid Substation within Field 27, as identified this is proposed on land of Grades 2, 3a and 3b, as set out in the ES Chapter 11: Soils and Agriculture [AS-018] especially sections 11.8.35 to 11.8.42. The comments are noted, but siting of infrastructure is determined by a number of factors and, on the basis that much of the area will be restored, a design decision was taken by the Applicant. There is a consequential adverse impact, as described in ES Chapter 11: Soils and Agriculture [AS-018]. Taking a reasonable worst-case assessment, as set out in 11.8.41 <i>et seq</i>, the permanent loss or downgrading of the area would be below 20ha and therefore below the threshold for consultation with Natural England, which would in turn result in a minor adverse effect. The ES sets out details of council-level availability of agricultural land, including that of BMV quality, and sets out an assessment of the local agricultural effects, taking a long-term view and assuming cereal crop production.	Under Discussion Low



			Since the publication of the ES, a new Predictive Agricultural Land Classification Map for England has been published. This is reported in the Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072] , submitted at Deadline 1. The information is summarised in BC 2-2 below. Avoidance of land of BMV quality on a wider basis is unlikely to be achievable in the Breckland area.	
BC 2-2	Environmental Statement and effect on food production from NSIPs across Norfolk	The Council do acknowledge that as set out ES Chapter 11: Soils and Agriculture [AS-018], the cumulative area involved with The Drovers, East Pye and High Grove amounts to about 1% of farmed land in the county.	This is noted by the Applicant	Agreed
BC 2-3	Environmental Statement and cumulative effect	The Council now considers that the scope of the cumulative assessment needs to be amended to consider the wider impacts of renewable energy development upon agricultural land across Norfolk. In addition, strong concerns remain regarding the level of uncertainty regarding the layout of both the Drovers and High Grove schemes. As such, the cumulative land loss and the resulting impact upon BMV are unknown at this stage. The Council accepts the Applicant's assessment of cumulative agricultural effects arising from identified NSIP schemes. However, it remains concerned that decision-makers do not currently have	Four NSIP schemes were identified near the Scheme, two of which were for solar development, and these are assessed in ES Chapter 11: Soils and Agriculture [AS-018] and listed in Table 11-10. At the time of the ES, limited information about the ALC grading was known, but in 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. Please refer to the Applicant's response in Table 1, with regards to the identification of other cumulative schemes, updates to the long list as well as levels of uncertainty.	Under Discussion Low



		a full understanding of the cumulative implications of renewable energy development across Norfolk and Breckland. The Council therefore considers that the cumulative agricultural implications should be viewed in the context of the wider pattern of renewable energy development coming forward across the county.	The Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072] considers a much wider potential cumulative impact from other development within the Council's area and across Norfolk, and addresses the Council's comments. The Update Note considers the cumulative effect including of other NSIP solar projects (High Grove and East Pye), other solar farms (Boulton Solar, Palgrave Road Solar), the A47 road improvements, the Grantham to Bexwell Pipeline, and proposed housing allocations across Norfolk. The cumulative effect of The Drovers, High Grove and East Pye proposals will involve 3,510 ha of agricultural land. This represents 0.840% of the total area on agricultural holdings in Norfolk. This is the land use figure. Land loss is very small. The proposed land loss due to proposed permanent development for housing or industry, from information provided with the applications or using the Predictive Map for England, over 500 ha of BMV land is predicted will be lost. The details are provided in Attachment B and mapped at Attachment C of the Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]. Paragraph 5.5 of the Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072] notes that the Drovers represents 0.8% of the total area on agricultural holdings within Breckland. High Grove involves 1,115 ha of land of BMV quality (Table 2). If this is added to the 455 ha of BMV used at	
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			The Droves, the cumulative area will be 1,570 ha of BMV land used. The total amount of land within the Order limits for The Droves (839 ha) and High Grove (1,658 ha) would be 2,497 ha. This would represent 2.53% of the 98,803 ha of land on agricultural holdings in Breckland, and 0.60% of the land on agricultural holdings in Norfolk. See Tables 2 and 3 of the Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072].	
BC 2-4	Environmental Statement and impact on agriculture	The ES still does not provide sufficient analysis of effects on local food production, tenancy disruption, and the functioning rural economy. The Council acknowledges that the scheme would retain an agricultural use through grassland management and sheep grazing, and that the ALC classification of the land would not change. However, the Council considers that the ES does not fully assess the implications of the transition from predominantly arable production to lower-intensity grazing, particularly in terms of the productive capacity of the land, the nature and intensity of agricultural use; and the extent to which the proposed land use represents an equivalent or optimal use of agricultural land, including BMV land. The Council notes that the site is currently used for a range of productive agricultural activities, including arable and specialist	The effects on the farm businesses on the land are considered in paragraphs 11.8.87 to 11.8.93 in ES Chapter 11: Soils and Agriculture [AS-018], having been described earlier in the baseline section 11.6. The wider effects are considered in sections 11.8.94 to 11.8.114. It is concluded that there are no food production concerns locally or nationally (and it is noted that in 2025 some 444,000ha of arable land was in funded agri-environmental uses, rather than food production). The economic implications are set out in the ES, assuming that there is no ongoing agricultural use of the site (i.e. a worst-case scenario), but sheep grazing will have labour and agricultural economy and supply chain requirements which would reduce the effect. The Council notes that the Site is currently used for a range of productive agricultural activities, including arable and specialist cropping, but considers that the ES does not clearly assess the extent to which these would be displaced or replaced in practice. ES Chapter 11: Soils and Agriculture [AS-018] at 11.6.24 that the land is currently farmed by:	Under Discussion Low



		cropping, and considers that the ES does not clearly assess the extent to which these activities would be displaced or replaced in practice. Accordingly, the Council considers that the effects of the scheme on agricultural land use, beyond land classification alone, require further consideration.	i. arable crops including cereals, oilseed rape, vining peas, potatoes, carrots, parsnips, onions (11.6.25); ii. outdoor pigs, four different groups, with two of these photographed (11.6.27); iii. sheep in winter (11.6.29) with some photographed. The ES Chapter at 11.8.87 to 11.8.93 describes the impacts. The effects are described as follows: i. arable cropping impacts are described in 11.8.89 for combinable crops, and in 11.8.92 for short-term vegetable growers. All will cease to operate these enterprises on the Site; ii. outdoor pig units will relocate to other areas outside the Site. These enterprises move every 2-3 years in any event. This is described in 11.8.88; iii. the sheep enterprises will be able to continue and expand, as described in 11.8.93. The wider implications are described in the ES at 11.8.94 through to 11.8.114, including theoretical production and economic effects. Accordingly the effects are described and assessed. There is no requirement to use land to any productive intensity. The Council refers to whether the proposed land use represents an “optional use of agricultural land, including BMV”, but policy does not recognise or require any optimal use. It is noted in the ES at 11.8.100 that in June 2025 some 444,000 of arable land was in non-food producing agri-environmental uses.	
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			The benefits of the Proposed Development in respect of soils are also described in the ES Chapter 11: Soils and Agriculture [AS-018] at 11.8.78 to 11.8.86.	
BC 2-5	Local implications	The Council acknowledges that the ES presents an assessment of food production at a regional and national scale, and that in this context the effects may be limited. However, the Council considers that the ES places significant reliance on strategic level analysis, and does not fully assess the site-specific and localised implications of the proposed land use change. In particular, the Council considers that there remains uncertainty as to the extent to which the loss of existing arable and specialist crop production would be offset by grazing activities, the implications for the ongoing operation and structure of existing farm businesses associated with the site, and the contribution of the site to the local rural economy, including agricultural output and related activity. The Council notes that while the land would remain in agricultural use, the proposed shift to lower intensity grazing may alter the nature, level and economic value of agricultural production associated with the site. Accordingly, the Council considers that the effects on food production and the rural	The Applicant has considered the localised implications in regard to land use and agriculture. ES Chapter 11: Soils and Agriculture [AS-018] sets out an assessment of the effects, identifying national, county and district land availability and quality (Table 11-8). The cumulative assessment section (11.11) sets out an assessment at the county level. The request for a more localised analysis is noted, and the Applicant has updated ES Chapter 11: Soils and Agriculture [AS-018] at Deadline 1 to contain this information. As noted in response BC 2-4 above, the wider implications are described in the ES at 11.8.94 through to 11.8.114, including theoretical production and economic effects. Accordingly the effects are described and assessed. There is no requirement to use land to any productive intensity. The Council refers to whether the proposed land use represents an “optional use of agricultural land, including BMV”, but policy does not recognise or require any optimal use. It is noted in the ES at 11.8.100 that in June 2025 some 444,000 of arable land was in non-food producing agri-environmental uses. The benefits of the Proposed Development in respect of soils are also described in the ES at 11.8.78 to 11.8.86. As noted in the Applicant’s Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072] at 5.4 and Table 3, across Breckland and South Norfolk (Breckland data in	Under Discussion Low



		economy at a local level are not fully evidenced and require further examination. The Council considers this issue to have a low chance of agreement being reached.	isolation is not published), the area of uncropped arable land in 2025 was 20,353 ha, which is 11.6% of the agricultural land on holdings. There are approximately 799ha of agricultural land within the Order Limits (see Table 2 in the Applicant's Update Note on Published Information and Cumulative Assessment on Agricultural Land [REP1-072]). The shift to lower intensity farming and non-arable farming of this area represents a small figure compared to the areas nationally and locally that are currently not farmed but are managed for agri-environmental benefits.	
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Table 3 – Community Benefit

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 3-1	Public Benefit	The Council considers that there is insufficient demonstration of public benefits at district level, including limited local energy benefit and unclear Community Benefit Fund structure. The Council considers that more could and should be done in terms of public benefits at a local level.	There are currently no mandatory or legislative frameworks in the UK to support community benefits, but voluntary guidance does exist and has been considered by the Applicant. There are no current plans to provide subsidised energy or rebates to the local community directly as a result of the Scheme. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider scale benefits of the Scheme. The electricity generated by the Scheme would be exported to the national grid, at which point it would cease to be under the Applicant's control and would instead be dispatched and distributed by the operator in accordance with supply and demand across the network. The Scheme will make a contribution to meeting the UK's net zero requirements	Under Discussion Low



			for energy production, which is considered a critical national priority and set out in National Policy Statements (NPS) for Energy NPS EN-1 (section 4.2) and NPS EN-3. This therefore will benefit the national population rather than just the local population. The Applicant is committed to ensuring that communities benefit from the Scheme. As set out in the Planning Statement [REP1-012], the Applicant has committed to providing a Community Benefit Fund. Throughout the pre-application process, the Applicant has consulted on community benefits and, based on feedback and ongoing discussions, will determine how best to distribute funding. The Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). Efforts to provide specific benefits in locally impacted communities are set out in the outline Employment, Skills and Supply Chain Strategy [APP-195] (for employment and economy), in the oLEMP [APP/7.11.2] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes (as secured in the oPRoWPPMP [APP-192]), or through the Community Benefit Fund (separate to the DCO process).	
BC 3-2	Community Benefit Fund	It is considered that the applicant must ensure all stakeholders/communities are made aware of such funds and have the opportunity to make appropriate bids for the Community Benefit Fund.	As confirmed in the Planning Statement [REP1-012], the Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as	Under Discussion Low



		A Community Benefit Fund is not considered part of the environmental information required in the ES. It is considered that the following should be provided and addressed during examination: "Commitments Register" ES appendix, providing clarification on how it will be secured, discharged and monitored; and A separate Community Benefits Statement (though not a statutory requirement).	part of the decision-making process). It would, therefore, be inappropriate to include the Community Benefit Fund in the Commitments Register [APP-179] and/or submit a separate Community Benefits Statement into the examination. In relation to Breckland Council's request for details of how the Community Benefit Fund will be governed and set up, the Applicant notes that a local foundation will likely independently determine the local initiatives to provide services to the community that are chosen to benefit from the Community Benefit Fund. The Applicant also notes that the Community Benefit Fund would be calculated based on the Scheme's generating capacity (MW per year) and delivered in line with industry standards for renewable energy projects. The Applicant will ensure that all stakeholders are made aware of the community benefit fund in place and are able to have the opportunity to input where appropriate. Index linking the fund to inflation will be considered by the Applicant.	
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Table 4 – Landscape and Visual

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 4-1	Methodology	The methodology, particularly the judgement of resulting effects, is not transparent. The Council recommends revising the methodology to remove the ambiguity in paragraph 6.2.13 and to provide clear, transparent explanations of the resulting levels of effect.	There is no para 6.2.13 within ES Chapter 6: Landscape and Visual [AS-016] . The full detailed of the methodology for the LVIA is provided within Section 6.5. The para quoted is para 6.5.16 which clearly sets out what effects are considered significant, potentially significant or not significant in EIA terms.	Agreed



		The supporting text in Para 6.2.13 does not clarify which of the above levels of effect is considered Significant and states: <i>“An effect is likely to be assessed as Significant where the sensitivity of the Receptor combined with magnitude of change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in Diagram 6.1 above) and is therefore judged more “likely to influence the eventual decision”.</i>	Para 6.5.15 notes that: <i>“Effects that are Major or Major-Moderate are considered significant and “likely to influence the eventual decision” whilst those that are Slight or below are judged Not Significant and “of lesser concern” (GLVIA3, para 3.35). Moderate effects are considered to be potentially significant and professional judgment is used to determine whether the effect in question is Significant or Not Significant, with analysis provided to justify the rating.”</i> The LVIA methodology has been applied on numerous other NSIP and TCPA applications.	
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Table 5 – Glint and Glare and Amenity

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 5-1	Site Survey	The applicant has confirmed that a site survey has not been undertaken in the preparation of the Glint and Glare Assessment. The Council considers that a site survey is necessary to ensure that the reported findings are sufficiently robust to withstand the scrutiny of examination.	The author of the ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176] has not conducted a site walkover, but site photography produced by the applicant was reviewed in conjunction with aerial imagery to confirm visibility. This is consistent with the approach taken for other solar DCOs and is equally effective in determining the extent of existing screening.	Under Discussion Agreed
BC 5-2	Complaints Procedure	As part of the operational management plan, the officer recommends that a process for receiving, managing and responding to complaints is prepared. It is noted that the applicant does not consider a complaints procedure to be	The oOEMP [APP/7.8.3] submitted at Deadline 2 includes general provisions relating to the receiving, managing and responding to complaints, as set out in Section 2.17. This procedure relates to all complaints, including those relating to Glint and Glare if they were to arise.	Under Discussion Medium



		necessary, however, the Council disagrees in this regard and requests such a procedure is secured via the DCO in the event consent is granted. Whilst the Council notes the general complaints procedures contained within the oOEMP, it remains concerned that no explicit reference is made to glint and glare complaints. The Council considers that a dedicated mechanism for recording, investigating and resolving glint and glare complaints should be secured should consent be granted.	The oOEMP [APP/7.8.3] sets out that in respect of Air Quality, the Site Management will <i>'Record all dust and air quality complaints'</i> and <i>'make the complaints log available to the local authority'</i>. The cause of the complaints will be identified, and appropriate measures will be taken to address this. The oOEMP [APP/7.8.3] states that as a monitoring requirement, in respect to noise and vibration: <i>'The complaints procedure will be managed in consultation with Breckland Council which will be reviewed annually'</i> and that <i>'Further details are to be confirmed in the detailed OEMP'</i>. Finally, the document states that through an appointed Environment Manager <i>'Corrective actions [will be] taken in response to incidents, breaches of the approved detailed OEMP or complaints received from a third party.'</i>	
BC 5-3	Cumulative Effects	It is not considered that the following issue, raised during both the stat consultation and within the Relevant Reps (para. 4.3) has been addressed: High Groves Solar – The consultation documents assess that cumulative impacts are possible towards one dwelling receptor, which is predicted to experience residual impacts from the proposed development for both panel configurations and have visibility of High Groves Solar. It is noted that the potential for cumulative impacts will be considered by the Applicant as further details are known regarding the High Grove Solar project,	Further to the statutory consultation documents, the Applicant has assessed the cumulative glint and glare impact of the Scheme and High Grove, as set out in ES Chapter 16: Other Environmental Matters [APP/6.2.1]. Paragraph 16.6.38 states that "Only one dwelling (dwelling receptor 20) is within the cumulative assessment zone and is predicted to experience an impact (categorised as low) from the Scheme. This dwelling is likely to have visibility of both sites, but cumulative impacts are unlikely as reflections will not occur at the same time and will not be visible from the same windows". The Applicant is therefore of the view that the cumulative impact has been considered and that cumulative impacts are unlikely.	Under Discussion Medium



		the Applicant noting that additional mitigation may be required to reduce the level of impact. The officer notes that the Scoping Report for High Grove Solar states that solar panels may be either fixed south facing or east-west single-axis tracking. The Drovers consultation report indicates that the worst-case scenario for cumulative impacts would be if the two solar farms shared the same panel technology and angles. The officer therefore considers that a further report will be required once sufficient details are known for both solar farms. The Council's Environmental Health Officer has re-iterated the point that it is not considered photographs are sufficient to assess the level of screening for a development of this scale and complexity.	The Applicant would also note that the High Grove Solar Farm will be required to undertake a comprehensive cumulative impact assessment as part of the Environmental Impact Assessment to support their DCO Application. The Environmental Statement accompanying the High Grove DCO application will present the cumulative assessment based upon the detail set out in the Scheme's.	
BC 5-4	Air Quality	It is outlined at point 6.23 of the Local Impact Report that air quality is not considered to constrain the Proposed Development, subject to the implementation of mitigation secured through the Development Consent Order.	This is agreed with the Applicant	Agreed
BC 5-5	Noise	The Local Impact Report details that the scope of the Applicant's assessment with regards to noise is appropriate to the scale and nature of the Proposed Development.	This is agreed with the Applicant.	Agreed



BC 5-6	Noise-Cumulative	It is not considered that the following point on noise from the Relevant Reps (para. 4.12) has been addressed: The EHO notes “The Off Barn” on Sporle Rd may be subject to cumulative noise effects resulting from both The Drovers Solar Farm and High Grove Solar Farm. It is predicted that under the worst-case scenario noise levels could reach 37dBA. Whilst the EHO acknowledges that this is a worst-case scenario, the worst case is likely to occur during weather conditions when residents are most likely to be enjoying outdoor areas and have windows and doors open. The applicant has indicated that they are in further consultation with High Grove Solar, however, it should be noted that High Grove Solar Farm has already committed to a lower noise level of 33dBA. As such, it is considered that the onus should be on Drove Solar to achieve 35dBA. It is considered vital that acceptable levels of noise effects are achieved as residents will not have the recourse of statutory nuisance provisions in the event that consent is granted.	High Grove Solar Farm development is currently in ‘pre-application stage’ as such, limited information regarding noise and mitigation is available. Additional mitigation has not been detailed in High Grove Solar Farm’s noise and vibration assessment; however, their PEIR Chapter 11 states in Section 11.9 ‘The Applicant has committed to revise the design of the Proposed Development to relocate electrical infrastructure away from the ESRs predicted to experience significant effects and maintain the offsets from the non-significant ESRs. The revised layout will be assessed at ES stage.’ The Applicant would also note that the High Grove Solar Farm will be required to undertake a comprehensive cumulative impact assessment as part of the Environmental Impact Assessment to support their DCO Application. The Environmental Statement accompanying the High Grove DCO application will present the cumulative assessment. Furthermore, it is, however, noted that the Applicant is committing to collaboration with the undertakers of the High Grove Solar Farm during the detailed design stage of the Scheme, to seek to achieve cumulative noise levels that do not exceed 35dB(A) at ‘The Off Barn’ receptor during the operational phase (as secured in paragraph 2.5.4 of the oCEMP [APP/7.6.3]).	Under Discussion High
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Table 6 – Ecology and Biodiversity

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 6-1	Arboriculture	There is concern with the proposed Removal of T206 (Category A Tree). This is defined as a tree of high quality and value within the AIA with an estimated remaining life expectancy of at least 40 years. The removal of a Category A tree to facilitate the siting of solar array panels is not supported by the Council.	The Applicant can confirm that T206 will be retained and provided with the minimum offsets as per the commitments in the Design Principles, Parameters and Commitments [APP/5.8.3] and oLEMP [APP/7.11.2] .	Agreed
BC 6-2	Arboriculture	The current alignment of access tracks and/or haul roads appears to encroach unnecessarily into the RPAs of the following tree groups: G26 – Category A group G9 – Category B group G109 – Category B group G118 – Category B group The Council notes that the details are currently indicative, however, considers it to be imperative that all crossing points should be kept to an absolute minimum.	The access track routing is not secured through the DCO Application and is shown indicatively on the illustrative layout for informative purposes only. The final access track alignment will be determined in accordance with the commitments set out in the Design Principles, Parameters and Commitments [APP/5.8.3] and oLEMP [APP/7.11.2], which state that internal access tracks will be offset from existing landscape features, with the exception of crossing points, by the following (minimum) distances: Hedgerows – 8m. Hedgerows – with trees – 10m. Individual trees and groups of trees – 10m. Veteran and Ancient trees – 15x width of tree stem diameter. Internal access tracks will follow the alignment of the existing agricultural tracks, where practicable, with the exception of the droves and PRoWs.	Under Discussion Medium



BC 6-3	Veteran Trees	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.	The Applicant notes this comment and 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, updated to reflect the publication of the LNRS. 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. Nonetheless, in light of the comments, further clarification and confirmation of this position has been included within the updated Biodiversity Net Gain Assessment Report [REP1-048] submitted at Deadline 1.	Agreed
BC 6-4	Watering	Watering should not be limited to the first year after planting. Instead, it should continue for two growing seasons, with ongoing monitoring and replacement of any failed plants. Extending the establishment period in this way will greatly improve plant survival and help ensure the intended landscape and biodiversity benefits are achieved.	The oLEMP [APP/7.11.2] states in para 7.4.8 and para 7.3.57 that " <i>all trees and shrubs will be regularly watered in the first summer and thereafter as required to ensure successful establishment</i> " in relation to proposed woodland belt and copse management and also proposed hedgerow tree management. This approach would also be taken for hedgerow planting. Greater clarity on watering for two growing seasons, with ongoing monitoring and replacement of failures during that period has been included within an updated oLEMP [APP/7.11.2] at Deadline 1 to capture this amendment.	Agreed
BC 6-5	Lighting	The Council's Tree and Countryside Officer considers that it is necessary to address the potential ecological impacts	The Applicant notes the concerns raised in regard to the need to ensure that a detailed lighting assessment is	Agreed



		associated with artificial lighting within the proposed development. The introduction of inappropriate or excessive lighting could adversely affect: nocturnal and crepuscular species (including bats); Foraging and commuting corridors along hedgerows, tree belts and ditch networks; Ground-nesting birds and farmland species; Invertebrate populations; General habitat connectivity across the site. A DCO Requirement securing the submission and approval of a Sensitive Lighting Strategy prior to installation is therefore recommended. It is considered that such an approach would ensure the development proceeds in a manner consistent with ecological best practice and minimises impacts upon local wildlife and habitat connectivity. The Council add that they accept that the panels will not be lit, however, concerns remain and it is considered a strategy is required for lighting associated with the Customer Substation, National Grid Substation, and within the BESS compound.	conducted in order to ensure that lighting levels are appropriate for ecological receptors. The Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion sensing lighting and be used only for security and maintenance purposes as secured in oOEMP [APP/7.8.3] and explained in ES Chapter 5: The Scheme [REP1-032]. The Design Principles, Parameters and Commitments [APP-048] confirm that “<i>The Solar arrays will not be lit during the operational phase</i>”, such that any lighting will be limited to temporary construction lighting and health and safety/security requirements associated with the Customer Substation, National Grid Substation, and within the BESS compound. These areas represent a very small proportion of the site. Additionally, commitments to ensure that a sensitive lighting strategy is developed as part of the detailed design to mitigate adverse impacts have been made within the oCEMP [APP/7.6.3] and oOEMP [APP/7.8.3], as updated at Deadline 2 (as secured by Requirement 13 and 14 of the draft DCO). ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] has assessed impacts associated with lighting on sensitive species and habitats, as appropriate and required, and concluded no significant effects.	
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		All lights should conform to the Council's original specification request: <i>Fully shielded, directional fittings; Warm white spectrum (preferably $\leq 2700K$); No upward light spill; Low mounting heights; PIR or motion-sensor activation rather than constant illumination, lux levels at hedgerow and tree canopy edges reduced to near baseline (≤ 0.5 lux where bats are present, subject to ecological advice)</i>		
BC 6-6	BNG	The Council highlights the proposed Biodiversity Net Gain figure of 10% is significantly lower than the 50% proposed as part of Statutory Consultation for Highgrove Solar Farm. As such, it is considered that more could and should be done in this regard. The Council add that the report states "substantially in excess of 10%". Can the applicant provide any more certainty in regard to the true figure? The Council considers that if biodiversity net gain is to be relied upon as a benefit of the scheme, the anticipated gain should be clearly quantified and consistently reported throughout the examination. Until such information is provided, the Council considers limited weight can be attributed to this claimed benefit.	Specific consideration and assessment in relation to overall biodiversity value is set out within the Biodiversity Net Gain Assessment Report [REP1-048], using the government metric and associated guidance. This demonstrates that the Scheme will deliver a BNG substantially in excess of 10%, and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme. Whilst no statutory requirement is currently in place in relation to DCO Schemes, the identified BNG is therefore substantially in excess of the figure of 10% currently required for new developments under the Town and Country Planning Act 1990 and similarly anticipated for NSIPs under the emerging consultation information published by DEFRA. The draft DCO [APP/3.1.3] secures the final BNG of above 10 percent through Requirement 9.	Under Discussion Medium



BC 6-7	BNG	The Council considers that the Metric should be updated to reflect the October 2025 publication of Local Nature Recovery Strategy, as noted in the BNG report. This will affect all trees recorded in the baseline and the other neutral grassland being created post-development.	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 [REP1-048] , the assessment has been updated at Deadline 1 in order to reflect the publication.	Agreed
BC 6-8	Ecological Assessment	Point 7.12 of the Local Impact Report concludes that overall, subject to the conclusions of Natural England, that: the scope of the ecological assessment appears proportionate to the scale and nature of the Proposed Development; and the identification of mitigation and enhancement measures is consistent with established practice for solar NSIPs.	The Applicant agrees with this position	Agreed

Table 7 – Water, Flood Risk & Drainage

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 7-1	Private Water Supplies	Keepers Cottage should be included within the water-testing regime both before and after construction, with appropriate mitigation put in place if any issues are identified.	The Applicant has included Keepers Cottage within the water-testing regime both before and after construction. ES Chapter 12: Water Resources [APP/6.2.2] assessed the potential effects from the Scheme on the Keepers Cottage supply as negligible, based on the potential composition of the PV Mounting and the types of metals used in Work Nos. 2 to 4. Regardless, the oCEMP	Agreed



			[APP/7.6.3] has been updated at Deadline 1 to include monitoring at the supply to provide an added level of protection.	
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Table 8 – Draft DCO

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 8-1	Requirement (7)	In relation to the discharge of the DCO requirement (7) for the Landscape and ecological management plan the draft refers to “consultation with the relevant statutory nature conservation body”. The Council considers that Natural England should be specifically referenced in this instance. The Council's concern is not the ability to refer to successor organisations, but the need to ensure that appropriately qualified statutory ecological and agricultural expertise is consulted during Requirement discharge. The Council therefore considers that Natural England should be expressly identified, whilst allowing reference to any successor body where relevant.	The Applicant considers that the wider-ranging drafting of “the relevant statutory nature conservation body” is more appropriate to ensure appropriate consultation, rather than specifically referring to Natural England. This is to address the potential scenario of Natural England ceasing to exist or having its functions devolved.	Under Discussion Medium
BC 8-2	Requirement (8)	In relation to the discharge of the DCO requirement (8) for the Operational traffic management plan the draft refers only to submission and approval by the local planning authority. The Council considers	The Applicant will update Requirement 8 of Schedule 2 of the draft DCO [APP/3.1.3] to ensure that before approving the operational traffic management plan, the relevant planning authority must consult with the relevant highway authority.	Agreed



		that consultation with Norfolk County Council Local Highway Authority and National Highways should be specifically referenced in this instance.		
BC 8-3	Requirement (9)	In relation to the discharge of the DCO requirement (9) for the Biodiversity net gain strategy the draft refers to “consultation with the relevant statutory nature conservation body”. The Council considers that Natural England should be specifically referenced in this instance. The Council's concern is not the ability to refer to successor organisations, but the need to ensure that appropriately qualified statutory ecological and agricultural expertise is consulted during Requirement discharge. The Council therefore considers that Natural England should be expressly identified, whilst allowing reference to any successor body where relevant.	The Applicant considers that the wider-ranging drafting of “the relevant statutory nature conservation body” is more appropriate to ensure appropriate consultation, rather than specifically referring to Natural England. This is to address the potential scenario of Natural England ceasing to exist or having its functions devolved.	Under Discussion Medium
BC 8-4	Requirement (11)	In relation to the discharge of the DCO requirement (11) for the Surface and foul water drainage the draft refers to “the Environment Agency and Anglian Water Services Limited or its successor in function as the relevant water undertaker”. The Council considers that Norfolk County Council in its role as the Lead Local Flood Authority should also	The Applicant notes that Requirement 11 of Schedule 2 of the draft DCO [APP/3.1.3] requires the Applicant to submit “ <i>to the relevant planning authority</i> ” the written details of the surface water drainage scheme and (if any) foul water drainage system. As part of this approval, the relevant planning authority must consult with the Environment Agency and Anglian Water Services Limited or its successor in function as the relevant water undertaker. However, the relevant planning authority is also entitled to consult with any other organisation if they deem it necessary to do so, which can include Norfolk	Under Discussion Medium



		be specifically referenced in this instance.	County Council in its role as the Lead Local Flood Authority. It is therefore unnecessary for the potential for this consultation to be spelt out on the face of the draft DCO [APP/3.1.3] . The Applicant has, therefore, not amended the wording of Requirement 11 of Schedule 2 of the draft DCO [APP/3.1.3] in this regard.	
BC 8-5	Requirement (12)	In relation to the discharge of the DCO requirement (12) for the programme of archaeological investigation the draft refers to submission to and approval by the relevant planning authority. The Council considers that consultation with Norfolk County Council Historic Environment Service should be specifically referenced in this instance.	The Applicant notes that Requirement 12 of Schedule 2 of the draft DCO [APP/3.1.3] requires the Applicant to submit “to the relevant planning authority” a written scheme of investigation. As part of this approval, the relevant planning authority is entitled to consult with any other organisation if they deem it necessary to do so, which can include the Norfolk County Council Historic Environment Service. It is therefore unnecessary for the potential for this consultation to be spelt out on the face of the draft DCO [APP/3.1.3] . The Applicant has, therefore, not amended the wording of Requirement 12 of Schedule 2 of the draft DCO [APP/3.1.3] in this regard.	Under Discussion Medium
BC 8-6	Requirement (15)	In relation to the discharge of the DCO requirement (15) for the Construction traffic management plan the draft refers only to consultation with the relevant highway authority. The Council considers that consultation with Norfolk County Council Local Highway Authority and National Highways should be specifically referenced in this instance.	The Applicant considers that the wider-ranging drafting of “the relevant highway authority” is more appropriate to ensure appropriate consultation, rather than specifically referring to Norfolk County Council Local Highway Authority and National Highways. The Applicant also notes that Councils are, under this Requirement, entitled to consult with any other organisation if they deem it necessary to do so.	Agreed
BC 8-7	Requirement (16)	In relation to the discharge of the DCO requirement (16) for the Public rights of way and permissive paths management plan the draft refers only to submission	The Applicant notes that Requirement 16 of Schedule 2 of the draft DCO [APP/3.1.3] already requires, at subparagraph (3), the relevant planning authority to consult with the relevant highway authority before approval of the	Agreed



		and approval by the local planning authority. The Council considers that consultation with Norfolk County Council Local Highway Authority should be specifically referenced in this instance.	public right of way of permissive path management plan. The Applicant considers that the wider-ranging drafting of “the relevant highway authority” is more appropriate to ensure appropriate consultation, rather than specifically referring to Norfolk County Council Local Highway Authority. The Applicant also notes that Councils are, under this Requirement, entitled to consult with any other organisation if they deem it necessary to do so.	
BC 8-8	Requirement (17)	In relation to the discharge of the DCO requirement (17) for the Soil management plan the draft refers to submission to and approval by the relevant planning authority. The Council considers that consultation with Natural England should be specifically referenced in this instance. The Council's concern is not the ability to refer to successor organisations, but the need to ensure that appropriately qualified statutory ecological and agricultural expertise is consulted during Requirement discharge. The Council therefore considers that Natural England should be expressly identified, whilst allowing reference to any successor body where relevant.	The Applicant notes that Natural England has not requested to be named as a consultee for approval of the soil management plan under Requirement 17 of Schedule 2 of the draft DCO [APP/3.1.3]. The Applicant is in discussions with Natural England regarding the contents of the outline soil management plan and is confident of reaching an agreed position during the course of the examination. The Applicant also notes that the request proposed by the Council is not precededented across the majority of made solar DCOs and, therefore, the Applicant does not intend to update the draft DCO [APP/3.1.3] in this regard. The Applicant also notes that Councils are, under this Requirement, entitled to consult with any other organisation if they deem it necessary to do so.	Under Discussion Medium


Table 9 – Grid Connection and Uncertainty of Development

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 9-1	Grid Connection and Uncertainty of Development	The Council has raised concerns regarding the certainty of the proposed grid connection arrangements for the scheme, as set out in the application documents, including the Grid Connection Statement. The Council notes that National Grid Electricity Transmission Plc, in its Relevant Representation, has stated that the point of connection and the location of any new 400 kV substation have not yet been confirmed or agreed, and that National Grid is not currently developing proposals for a new substation within the Order limits. The Council considers that this evidences a material discrepancy between the Applicant's description of the proposed grid connection infrastructure and the position of National Grid as the relevant statutory undertaker. As a result, the Council has concerns that key elements of the scheme, including the location of principal grid infrastructure, may be indicative only.	The Applicant notes NGET's Relevant Representation [RR-036] and directs the Council to its Response to section 89(3) letter dated 17 March 2026 [AS-063], in which the Applicant provides a history of the grid connection process and related communications with NESO and NGET, confirms the actions it has taken to be compliant with the terms of its current grid connection agreement, and provides its analysis of the relationship between the planning process and the ongoing Connections Reform process. The Applicant's Response to section 89(3) letter dated 17 March 2026 [AS-063] also sets out the Applicant's analysis of implications for the delivery of the Scheme and demonstrates that there is precedent (and policy) for the Applicant's approach. The Applicant also directs the Council to Agenda Item 3.2 of its Written Summary of Applicant's Oral Submissions and Responses to Action Points at Issue Specific Hearing 1 [REP1-071]. The Applicant has also responded to NGET's Written representations [REP1-090], in which NGET state that "NGET does not in principle object to the Project or to the inclusion of the New Substation within the Order Limits." The Applicant's response is included from electronic page 36 to electronic page 41 of Applicant's Response to Written Representations and other Deadline 1 Submissions [REP2-028]. In	Low



	The Council further considers that any change to the grid connection location or substation siting could have potential knock on implications for the assessment of environmental effects, including landscape, heritage, and land use impacts, which have been assessed on the basis of the scheme as currently described. The Council's concern is not based on hypothetical future development, but on whether the scheme as assessed in the Environmental Statement is defined with sufficient certainty to support robust decision making under the NSIP regime. The Council considers that reliance on any future Town and Country Planning Act application to address materially different grid connection infrastructure would place an undue burden on the LPA and would risk circumvention of the comprehensive assessment intended to be undertaken through the DCO process. The Council's concern is not whether alternative grid connection arrangements may be capable of subsequent consent, but whether the development currently before the Examining Authority has been	this submission, the Applicant notes that in the event that the Scheme is consented and later secures a Gate 2 agreement, there are at present no clear plans that the Applicant is aware of which suggest that the Scheme could connect to the National Electricity Transmission System (NETS) other than through the substation it is proposing as part of the Proposed Development. This provides further support for the Scheme coming forward as proposed, i.e. including the National Grid Substation. In response to the point made around reliance on any future TCPA application, the Applicant notes that such an application may not be required and indeed the Applicant's position is that none will be required. However, the Applicant's Response to section 89(3) letter dated 17 March 2026 [AS-063] sets out relevant precedent (see in particular Botley West and Springwell sections) in the Applicant's approach. The Clean Power 2030 Action Plan explains that The Government is "<i>expecting an increase in planning applications with the Clean Power 2030 target</i>" (p55), and sets out seven measures to manage the increase at both national and local planning levels.	
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		assessed on the basis of infrastructure that will actually be delivered. The Council remains concerned that environmental effects have been assessed on the basis of a connection solution which National Grid Electricity Transmission has not confirmed it intends to deliver. Consequently, the Council remains unconvinced that the assessed development necessarily reflects the likely built development.		
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Table 11- Heritage

Reference	Topic	Consultee's Position	Applicant's Position	Status
BC 11-1	Position on Heritage	The Council outline within their Local Impact Report that they do not have an in principle objection to the Proposed Development in relation to the historic environment.	This is noted by the Applicant	Agreed



THE DROVES
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