

The Drovers Solar Farm

Statement of Commonality (Tracked)

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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.
- 1.1.3 This document has been updated ~~between at~~ Deadlines ~~3 and 4, and accepted at the discretion of the Examining Authority,~~ to reflect the latest positions of the Statements of Common Ground ~~submitted at this Deadline, which have been updated (where possible) for the benefit of the hearings taking place in the week commencing 7 September 2026.~~ The document references have not been updated from the original submission. Please refer to the **Guide to the Application [APP/1.3.65]** 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 prepared eleven SoCGs which were submitted at Deadline 1. As outlined within the **Deadline 2 Cover Letter** [\[REP2-001\]](#), a twelfth SoCG with Breckland Council was promised for submission at Deadline 3, which the Applicant provided. A number of SoCGs that were submitted at Deadline 1 have also been updated during examination. This is reflected in the updated list of SoCGs below:

- SoCG with Breckland Council [APP/5.11.[24](#)]
- SoCG with Norfolk County Council [APP/5.12.[42](#)]
- SoCG with Environment Agency [APP/5.13.[24](#)]
- SoCG with Historic England [APP/5.14]
- SoCG with Natural England [APP/5.15.2]
- SoCG with National Grid Electricity Transmission Plc [APP/5.16]
- SoCG with National Highways [APP/5.17.1]



- SoCG with Anglian Water Services Limited [APP/5.18.[1](#)]
- SoCG with Norfolk Wildlife Trust [APP/5.19]
- SoCG with Borough Council of King's Lynn and West Norfolk [APP/5.20.[24](#)]
- 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 ~~between at~~ Deadlines ~~3 and~~ 4.
- 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.
- 3.1.3 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.
- 3.1.4 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 for this Additional Submission Deadline
APP/5.11. 24	Breckland Council (BC)	A revised draft SoCG was has been submitted at Deadline 4. A revised SoCG has been submitted between Deadlines 3 and 4. 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 have reviewed the



Document Ref.	Relevant Party	Position for this Additional Submission Deadline
		Technical Information Note – Landscape and Visual [REP3-083] which was submitted by the Applicant at Deadline 3. Other outstanding matters relate to While the Applicant and BC have reached agreement on a number of matters within the SoCG, the main matters still under discussion 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, cumulative effects, landscape and visual, glint and glare, ecology and biodiversity and the Draft DCO. The Applicant and BC are actively engaging to resolve these matters. BC has also now amended a number of matters within cumulative effects, land use/agriculture, community benefits, landscape and visual and grid connection and uncertainty of development to 'not agreed'. BC has confirmed that they do not consider that there is a benefit in discussing these items further for the remainder of the examination.
APP/5.12.24	Norfolk County Council (NCC)	A revised draft SoCG has beenwas submitted at Deadline 43, further to the initial SoCG provided at Deadline 1. This revised version includes the agreement of traffic and transport matters. Otherwise, the outstanding matters remain the same from Deadline 3 and as detailed below. 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 these points will be captured in an SoCG submitted at a future deadline. 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.
APP/5.13.24	Environment Agency (EA)	The Applicant has submitted a revised draft SoCG at Deadline 43, further to the initial SoCG provided at Deadline 4.



Document Ref.	Relevant Party	Position for this Additional Submission Deadline
		In line with Annex F of the Rule 6 Letter [PD-006] , the Applicant notes the main outstanding concerns relate to <u>BESS / fire safety and the Draft DCO</u> . The Applicant is continuing to reach agreement <u>engage</u> with the EA on these matters.
APP/5.14	Historic England (HE)	A Draft SoCG was submitted at 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 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/5.15.2	Natural England (NE)	The Applicant has submitted a revised SoCG between Deadlines 3 and 4, further to the revised SoCG provided at Deadline 3. 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.
APP/5.16	National Grid Electricity Transmission Plc (NGET)	An Initial SoCG was submitted at Deadline 1. This Initial SoCG was issued to the stakeholder on 5 May 2026. The Applicant has not yet received a response to this Initial SoCG, though the Applicant's lawyers and NGET's lawyers have been engaging on a form of protective provisions. 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/5.17.1	National Highways (NH)	The Applicant has submitted a revised SoCG between Deadlines 3 and 4, further to the Initial SoCG that was submitted at Deadline 1. In line with Annex F of the Rule 6 Letter [PD-006] , the Applicant notes the main outstanding concerns relate to wording in the draft DCO and land matters. The Applicant anticipates reaching agreement with NH on these matters and will provide an updated SoCG to reflect this, when possible.



Document Ref.	Relevant Party	Position for this Additional Submission Deadline
APP/5.18. <u>1</u>	Anglian Water Services Ltd (AW)	A Draft SoCG was submitted <u>a revised draft SoCG has been submitted</u> at Deadline <u>4</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. <u>Planning policy on water resources is noted as a medium likelihood of resolution, whilst firefighting water supply, the CEMP, and BESS firewater management are a low likelihood of resolution. The Applicant will aim to work with AW to provide this information at a subsequent deadline.</u> <u>The Applicant and AW are actively engaging to resolve these matters.</u>
APP/5.19	Norfolk Wildlife Trust (NWT)	A Draft SoCG was submitted at 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 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. <u>24</u>	Borough Council of King's Lynn and West Norfolk (BCKLWN)	<u>A revised draft SoCG has been submitted at Deadline 4.</u> The Applicant submitted a revised SoCG at Deadline 3, following the Draft SoCG provided at Deadline 1. 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>BCKLWN has also now amended several items within Cultural Heritage / Historic Environment and Land Use / Agriculture / Soil to 'not agreed'.</u>
APP/5.21	National Energy System Operator Ltd	A Draft SoCG was submitted at 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 not yet included within this version, as the parties are still discussing these matters. The Applicant will



Document Ref.	Relevant Party	Position for this Additional Submission Deadline
		aim to work with NESO to provide this information at a subsequent deadline.
APP/5.22	Defence Infrastructure Organisation	A Draft SoCG was submitted at Deadline 1. The Applicant has not yet received a response to this.

4 Summary

- 4.1.1 This section provides a summary of the main topics covered by the SoCGs submitted ~~between at~~ Deadlines ~~s 3 and 4~~ 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	Community Benefit
APP/5.11. 24	Breckland Council																												
APP/5.12. 24	Norfolk County Council																												
APP/5.13. 34	Environment Agency																												
APP/5.14	Historic England																												
APP/5.15. 2	Natural England																												
APP/5.16	National Grid Electricity Transmission Plc																												
APP/5.17. 1	National Highways																												
APP/5.18. 1	Anglian Water Services Ltd																												



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		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	Amenity
APP/5.19	Norfolk Wildlife Trust																													
APP/5.20. 24	Borough Council of King's Lynn and West Norfolk																													
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