THE DROVES
SOLAR FARM

The Droves Solar Farm

Statement of Common Ground (SoCG) with National Highways (Clean)

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1 Introduction

1.1 Overview

1.1.0 This Statement of Common Ground (SoCG) has been prepared as part of the application for a Development Consent Order (DCO) (the DCO Application) for The Droves Solar Farm (the Scheme) made by The Droves Solar Farm Limited (the Applicant) to the Secretary of State for Energy Security and Net Zero (SoS) pursuant to the Planning Act 2008.

1.1.1 SoCGs are an established means in the DCO consenting process, of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.1.2 This SoCG has been produced to confirm to the Examining Authority (the ExA) where agreement has been reached between the parties, and where agreement has not yet been reached.

1.2 Parties to this Statement of Common Ground

1.2.0 This SoCG has been prepared by the Applicant and National Highways (NH).

1.2.1 Collectively, the Applicant and NH are referred to as 'the parties.'

1.3 Purpose of this Document

1.3.0 This SoCG is a 'live' document and will be amended as the examination progresses, including as more information becomes available and as a result of ongoing discussions between the Applicant and NH, in order to enable a final version to be submitted to the ExA.

1.3.1 The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.

1.4 Terminology

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

Cell	Status
	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

2.1.0 The Scheme is a Nationally Significant Infrastructure Project (NSIP) for the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development comprising a Battery Energy Storage System (BESS), a Customer Substation and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50 megawatts (MW) Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.

2.1.1 The **Location Plan [APP-007]** shows the Order limits for the Scheme, which is approximately 840 hectares (ha) of land within Norfolk (the 'Order limits').

3 Record of Engagement

3.1 Summary of Engagement

3.1.0 The parties have been engaged in consultation since 16 October 2024.

3.1.1 A non-statutory consultation took place between 17 September and 1 October 2024. The statutory consultation process took place between 21 May and 9 July 2025.

3.1.2 The Applicant and NH have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has included discussions in relation to transport and access requirements, swept path analysis, potential off-site works at the A47 / A1065 junction, and submission documentation.

3.1.3 Table 3.1 shows a summary of key engagement that has taken place between the Applicant and NH in relation to the Application.

Table 3.1 – Record of Engagement

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

18/12/2024	Email Correspondence	Project team to VTP	Scoping Opinion received from the Planning Inspectorate and circulated for review, including matters relevant to National Highways' interests.
07/01/2025	Email Correspondence	Project team to VTP	Scoping Opinion response table issued and responses coordinated, alongside PEIR chapter preparation.
25/07/2025	Email Correspondence	Protect team to VTP	Feedback on PEIR / statutory consultation material for the Environmental Statement circulated for review and response, including highways-related matters relevant to National Highways.
07/08/2025	Email Correspondence	VTP to NH	Swept path analysis and confirmation of potential works at A47 / A1065 junction.
13/11/2025	Email Correspondence	NH to VTP	Confirmation on nature of potential off-site works at A47 / A1065 junction and that any temporary works, Road Safety Audits, or technical approval could be confirmed post-consent via Abnormal Loads License by contractor.
08/12/2025	Email Correspondence	VTP to NH	Update on progress of submission and provision of DCO Application documents.
20/03/2026	Email Correspondence	Project team to VTP	Relevant Representations received and understood, and preparation of the Statements of Common Ground commenced.
13/07/2026	Email Correspondence	NH to VTP	NH reviewed the updated oCTMP and Outline Travel Plan submitted at Deadline 1 **[REP1-052]** and requested further clarification on trip-generation assumptions, hourly vehicle distribution, daily vehicle caps, monitoring and reporting, workforce travel and the proposed shuttle service.

14/07/2026	Meeting	VTP and NH	The parties discussed the outstanding traffic and transport matters and the Applicant's proposed approach to resolving them through further clarification and updates to the oCTMP.
04/08/2026 to 07/08/2026	Email Correspondence	NH and VTP	Following review of the updated oCTMP submitted at Deadline 3 **[REP3-075]** and further responses on the workforce shuttle service and construction car-parking provision, NH confirmed to the Applicant on 7 August 2026 that all traffic and transport matters had been adequately addressed and could be considered closed.
September and October 2026	Email Correspondence	Applicant and NH	Correspondence relating to compulsory acquisition, protective provisions, DCO requirements and this SoCG.

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

4 Matters of Discussion

4.1 Overview

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

4.1.1 By way of email dated 7 August 2026, NH confirmed to the Applicant that all traffic and transport matters had been adequately addressed and could be considered closed – these are therefore shown as ‘agreed’ in the corresponding tables below. Matters in relation to the **draft DCO [APP/3.1.5]** remain subject to ongoing discussion between the parties, and the updates to this version

of the SoCG submitted at Deadline 5 reflect those matters (including in relation to the ExA's request for matters to be 'split out' where they do / do not relate to protective provisions).

4.1.2 Where discussions are ongoing, the parties will include an indication of the likelihood that disagreement will remain by the end of the examination in accordance with the **Rule 6 Letter [PD-006]**.

Table 4.1 – Planning and Overview

Reference	Topic	Consultee's Position	Applicant's Position	Status
NH3/NH4	Planning	NH notes that it is itself an active DCO promoter and understands the balance between scheme delivery and statutory consultee protections. NH considers the SRN deserves the same proportionate measure of protection. In this context, NH sets out seven minimum protection standards where there is potential for SRN impact: (a) being held harmless from third-party impacts; (b) adherence to NH network occupancy procedures; (c) NH certification and approval of highway works on completion; (d) financial provision against Applicant default; (e) indemnification for loss or damage; (f) prior approval from NH before exercising DCO powers in relation to the SRN; and (g) agreed emergency access procedures.	The Applicant considers that the form of protective provisions for the benefit of NH in Part 4 of Schedule 15 of the **draft DCO [APP/3.1.5]** adequately protects the SRN. The Applicant notes the minimum standards proposed and confirms these are addressed in the protective provisions for the benefit of NH in Part 4 of Schedule 15 of the **draft DCO [APP/3.1.5]**. The Applicant further notes that NH has recently agreed to the form of protective provisions in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO and is close to agreeing the form of the protective provisions for the Lime Down Solar Farm DCO and NH has confirmed its in-principle agreement to taking the same approach for this Scheme. The Applicant and NH remain in discussions on this matter, and the Applicant will update the **draft DCO [APP/3.1.5]** to reflect this mirrored approach once finalised with NH, which the Applicant anticipates being able to do before the end of the examination.	Under discussion – likely to be resolved prior to conclusion of examination.
NH48	Planning	NH notes that the Authorised Development will interface with the SRN	The Applicant acknowledges the interface with the SRN. **ES Chapter 9: Transport and Access [REP1-036]** assesses the anticipated transport and access effects of	Agreed

		and requires the impact on the SRN to be assessed.	the Scheme's construction, operation and decommissioning, and concludes that with the mitigation measures in place, secured through the **oCTMP [REP3-075]** and **oOTMP [REP3-079]**, there are no residual transport and access-related effects expected across the Scheme's construction, operation and decommissioning phases.	

Table 4.2 (a) – Lands and Compulsory Acquisition: Issues relating to Protective Provisions

Reference	Topic	Consultee's Position	Applicant's Position	Status
NH2(a)	Land	NH objects to the DCO in relation to the fact that multiple DCO articles authorise interference with NH's statutory powers and the SRN without adequate control. This point would not be relevant should the land parcels be removed from the Book of Reference, however, if the Applicant's proposed powers over these parcels remain in the DCO, then NH require its form of protective provisions to be agreed.	The Applicant notes the grounds of objection and confirms it has included a form of protective provisions for the benefit of NH in Part 4 of Schedule 15 of the **draft DCO [APP/3.1.5]**. NH has recently agreed to the form of protective provisions in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO and is close to agreeing the form of the protective provisions for the Lime Down Solar Farm DCO and NH has confirmed its in-principle agreement to taking the same approach for this Scheme. The Applicant and NH remain in discussions on this matter, and the Applicant will update the **draft DCO [APP/3.1.5]** to reflect this mirrored approach once finalised with NH, which the Applicant anticipates being able to do before the end of the examination. The temporary highway works at the A47/A1065 junction for AIL delivery are secured through the **oCTMP**	Under discussion – likely to be resolved prior to conclusion of examination.

			[REP3-075] and **ES Appendix 9.2: Traffic Assessment [APP-163]**.	
NH9	Land	NH holds Category 2 rights in plot 5-47 and 5-54 by Deed of Exchange dated 17 December 1984. NH requires further details of the proposed works on this parcel and, if there are traffic management implications, requires prior consultation and NH's consent before works take place. This point would not be relevant should the land parcels be removed from the Book of Reference, however, if the Applicant's proposed powers over these parcels remain in the DCO, then NH require its form of protective provisions to be agreed to ensure that any works undertaken have no adverse impact on NH's existing rights.	This consent requirement is included in the form of protective provisions in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO and is close to agreeing the form of the protective provisions for the Lime Down Solar Farm DCO and NH has confirmed its in-principle agreement to taking the same approach for this Scheme. The Applicant and NH remain in discussions on this matter, and the Applicant will update the **draft DCO [APP/3.1.5]** to reflect this mirrored approach once finalised with NH, which the Applicant anticipates being able to do before the end of the examination. The relevant works are temporary highway works at the A47/A1065 junction that may include verge reinforcement or temporary widening for future AIL delivery, as set out in the **oCTMP [AS-082]** and **ES Appendix 9.2: Traffic Assessment [APP-163]**. Works would be temporary, reinstated to original condition post-delivery, and confirmed to NH via the contractor as part of the AIL licence protocol and final Construction Traffic Management Plan.	Under discussion – likely to be resolved prior to conclusion of examination.
NH10	Land	NH is the Category 1 owner/occupier of plot 5-49, 5-50, and 5-55. NH requires further details of the proposed works and, if there are traffic management implications, prior consultation and NH's consent before works take place. This	See the rows above in relation to the protective provisions. The relevant works are temporary highway works at the A47/A1065 junction for AIL delivery, secured through the **oCTMP [REP3-075]** and **ES Appendix 9.2: Traffic Assessment [APP-163]**, and to be	Under discussion – likely to be resolved prior to conclusion of examination.

		point would not be relevant should the land parcels be removed from the Book of Reference, however, if the Applicant's proposed powers over these parcels remain in the DCO, then NH require its form of protective provisions to be agreed	confirmed to NH via the contractor as part of the AIL licence protocol.	
NH17	Land	NH requests confirmation as to whether it has an interest in any other plots beyond those identified.	The Applicant has identified all NH interests as set out in the **Book of Reference [REP3-011]** and **Land Plan [APP-008]**.	Agreed

Table 4.2 (b) – Lands and Compulsory Acquisition: Issues not relating to Protective Provisions

Reference	Topic	Consultee's Position	Applicant's Position	Status
NH2(b)	Land	NH also objects to the DCO in relation to the fact that compulsory powers (of temporary possession) are sought over 8 NH land plots, contravening the DCLG guidance on the Planning Act 2008: Guidance on preparing an application: Part 2 Application Contents which provides the Statement of Reasons "should set out the justification for the compulsory acquisition powers and temporary possession powers being sought in the application, and explain why these are necessary and proportionate to enable the proposed development to proceed without impediment". NH's position is that the proposal to acquire temporary possession over NH's land is not necessary or proportionate because an alternative approach is available to the	The Applicant maintains that the temporary possession powers sought over NH's land are necessary and proportionate, and compliant with the relevant statutory tests. The Applicant's full position on this matter is set out in the **Applicant's Response to Deadline 4 Submissions [APP/8.28]**.	Not agreed

		Applicant via NH's standard AIL notification process and therefore the NH plots should not be included in the Book of Reference, nor marked on the Land Plans/Works Plans and removed from the DCO itself. NH's full position on this matter is set out in NH's **Written Summaries of Oral Submission made at any hearings during w/c 7 September 2026 [REP4-054]**.		
NH8	Land	NH seeks further clarity on the purpose and reason for temporary possession of each of its 8 plots, noting the stated Purpose One is very wide and vague. However, NH understands that the Applicant is unable to provide any more information on the extent of works that will be required to the A47/A1065 junction beyond confirmation that the swept path assessment identifies that temporary removal of street furniture/signage and localised verge reinforcement or temporary widening may be required to accommodate the AIL movements and that the precise extent of any works will be confirmed by the appointed AIL contractor. NH does not accept that the land plots should be included in the Book of Reference. See NH2(b) above.	National Highways has been identified as having interests in relation to Plots 5-47, 5-49, 5-50, 5-51, 5-53, 5-54, 5-55 and 5-56, for which temporary possession is sought for Work No. 8A. This comprises temporary construction, maintenance and decommissioning access to Works Nos. 1, 2, 3, 6, 7, 9, 10 and 11, including the creation of accesses from the public highway, visibility splays, temporary alterations to street or highway layout, and offsite works in connection with AIL movements.	Not Agreed

Table 4.3 (a) – Legal and DCO: Issues relating to Protective Provisions

Reference	Topic	Consultee's Position	Applicant's Position	Status
NH5	Legal	NH sets out comments on the protective provisions in the Applicant's draft DCO and considers that its proposed preferred protective provisions (at Appendix 1 of the RR) address those concerns. NH requests that these preferred protective provisions are included in the draft DCO at the next deadline. NH provides full justification for each key provision and definition in the RR.	The Applicant agrees that a form of protective provisions for the benefit of NH is required on the face of the **draft DCO [APP/3.1.5]** to protect NH's interests and allay NH's concerns. The Applicant has included such provisions in Part 4 of Schedule 15 of the **draft DCO [APP/3.1.5]**. NH has recently agreed to the form of protective provisions in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO and is close to agreeing the form of the protective provisions for the Lime Down Solar Farm DCO, and NH has confirmed its in-principle agreement to taking the same approach for this Scheme. The Applicant and NH remain in discussions on this matter, and the Applicant will update the **draft DCO [APP/3.1.5]** to reflect this mirrored approach once finalised with NH, which the Applicant anticipates being able to do before the end of the examination.	Under discussion – likely to be resolved prior to conclusion of examination.

Table 4.3 (b) – Legal and DCO: Issues not relating to Protective Provisions

Reference	Topic	Consultee's Position	Applicant's Position	Status
NH37(a)	Legal — Req. 3	NH should be given an opportunity to review any amendments to approved documents or plans under Requirement 3, to ensure changes do not adversely impact the SRN or any land relevant to NH.	The Applicant does not intend to amend Requirement 3 in the manner suggested by NH. The Applicant's drafting mirrors the approach taken on the recently-consented Green Hill Solar Farm Order 2026 and the Lime Down Solar Park DCO, so the Applicant will not depart from this consistent wording.	Not agreed
NH37(b)	Legal – Reqs. 15	Further, NH requests that Requirement 15 of the DCO is amended from "in consultation with the relevant highway authority" to "in consultation with the relevant highway authority or authorities", reflecting NH's status as the highway authority for the SRN.	The Applicant notes that, for Requirement 15 of the **draft DCO [APP/3.1.5]**, "relevant highway authority" includes NH as relevant to the SRN, and therefore does not consider that the change proposed by NH is necessary. The Applicant's drafting mirrors the approach taken on the recently-consented Green Hill Solar Farm Order 2026 and the Lime Down Solar Park DCO, so the Applicant will not depart from this consistent wording.	Not Agreed
NH37(c)	Legal – Regs. 20	NH also requests that Requirement 20 (Decommissioning Strategy) is amended to include NH as a named consultee alongside the relevant local planning authorities, given NH's responsibility for the safe operation of the SRN. The same change as set out above should be made to Requirement 20(4) to refer to "*in consultation with the relevant highway authority or authorities*"	In relation to Requirement 20, the Applicant is content to amend paragraph (4) to also include consultation with the "relevant highway authority" and has made this amendment to the **draft DCO [APP/3.1.5]** submitted at Deadline 5. However, the Applicant does not consider that the further wording proposed by NH is necessary – the Applicant's drafting mirrors the approach taken on the recently-consented Green Hill Solar Farm Order 2026 and the Lime	Not Agreed

			Down Solar Park DCO, so the Applicant will not depart from this consistent wording.	
NH47	Legal — Sch. 16	NH is a requirement consultee under Schedule 16. NH objects to the 5 working day consultation period in paragraph 3(3) as insufficient, and to the deemed consent provision in paragraph 3(4) as disproportionate, as missing the window could result in NH not being able to comment. The ExA has indicated in the schedule of proposed changes to the DCO published on 29 September 2026 that the time periods in Schedule 16 3(2) and (3) should be changed to provide greater response times. NH is grateful to the ExA for revising the time periods, but the revised drafting still does not solve NH's issue. Under the revised drafting, the time NH has to review an application depends on how much of its own time allowance the local authority uses. If the authority uses its full allowance, NH could have as little as 5 working days, from day 5 to day 10, to review the application, prepare a response and make any request for further information. That is not enough time to review technical submissions of the kind expected under these requirements. The Applicant says that NH is protected because it can work from the copy of the application it receives under paragraph 2(1), rather than waiting for the authority's formal consultation. We do not accept that this gives adequate protection. Paragraph 2(1) gives NH no right to be	The Applicant does not agree that the time periods in Schedule 16 of the **draft DCO [APP/3.1.5]** should be amended. The Applicant's full position on this matter is set out in the **Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO [APP/8.30]**. The Applicant accepts that the parties are likely to 'agree to disagree' on this matter.	Not Agreed

		consulted and no right to have its request passed on. It also does not stop the day-20 cut-off from running. This is particularly important where the consequence of missing the cut-off is loss of the opportunity to obtain further information. NH therefore request that the drafting is amended so that NH has a suitable guaranteed minimum period of 15 working days, running from the date it receives the formal consultation. The authority's determination period and the day-20 cut-off should be extended to 25 working days to accommodate that period, so that the time allowed to the consultee cannot be reduced by the time the authority itself takes and the authority should be under an obligation to issue the consultation in a shortened period of 5 working days. This would mean that if the authority uses its full allowance at each stage, NH still get 15 working days to decide whether further information is required.		

Table 4.4 – Transport and Access

Reference	Topic	Consultee's Position	Applicant's Position	Status
NH49	Traffic and Transport	NH would expect to see junction modelling undertaken for any junctions which exceed a 30 two-way vehicle impact along the strategic road network at the A47 during the AM and PM peak hours.	The Applicant confirms that construction vehicles will be restricted to avoid the AM and PM peak periods, as secured through the **oCTMP [REP3-075]**, ensuring there are no material impacts during the AM and PM peak hours. In addition, the **oCTMP [REP3-075]** confirms that construction staff will primarily	Agreed

			arrive before and depart after the peak periods, meaning there is unlikely to be any conflict with the SRN peak network periods.	
NH50	Traffic and Transport	NH would expect for the **oCEMP [APP-186]** to include further details on the monitoring regime and enforcement protocols to appropriately mitigate against the construction impacts associated with construction vehicles.	The Applicant accepts NH's comment and has updated the **oCTMP [REP3-075]** at Deadline 3 to include additional detail on the monitoring and enforcement regime for construction vehicles. It is considered that this is the more appropriate control document than the **oCEMP [REP3-073]** as it relates to construction vehicles.	Agreed
NH51	Traffic and Transport	NH has requested further detail on the consideration of sustainable travel and requires a Travel Plan to form part of the submission documentation. NH echoed the request for more detail on the control measures for monitoring and enforcement for corrective measures in the event that the construction strategy set out within the oCEMP and oCTMP are not adhered to, to ensure the SRN is not compromised.	The Applicant has prepared an Outline Travel Plan as an appendix to the updated **oCTMP [REP3-075]** for agreement with NH. The **oCTMP [REP3-075]** was updated at Deadline 3 to include additional detail on the monitoring and enforcement protocol for construction vehicles.	Agreed
NH52	Traffic and Transport	NH propose that any temporary signage or works would require a Road Safety Audit.	The matter is agreed and it is accepted that the Road Safety Audit is secured via the updated **oCTMP [REP3-075]**, being undertaken prior to commencement of construction once the works are known.	Agreed
NH53	Traffic and Transport	NH provided additional input on the scope of condition survey to include the junctions on the A47.	The NH comment is accepted and has been incorporated into the updated **oCTMP [REP3-075]** at Deadline 3.	Agreed

NH54	Traffic and Transport	NH noted that any increase in vehicle trips during construction or as part of the final Construction Traffic Management Plan, above what is presented within the **oCTMP [APP-187]**, would require further assessment.	The Applicant accepts this comment and the cap of vehicles is be secured through the **oCTMP [REP3-075]**. The contractor would not be able to exceed this threshold without prior agreement with the relevant authorities, including NH.	Agreed
NH55/NH56	Traffic and Transport	NH request additional reassurance that the application includes measures within the oCTMP and Outline Travel Plan are appropriately enforced and remedial measures if not implemented.	The **oCTMP [REP3-075]** has been updated to include additional detail on the monitoring and enforcement protocol for construction vehicles.	Agreed
NH58/NH59	Traffic and Transport	NH note that any Abnormal Indivisible Load deliveries would be subject to the ESDAL system, with associated timescales for notification and that whilst the provisional routing included in the DCO is acceptable, the final routing is to be agreed prior to commencement.	The NH response is noted and secured through the updated **oCTMP [REP3-075]**.	Agreed
NH60	Traffic and Transport	NH comment on the minor works required at the A47 / A1065 junction required to facilitate the Abnormal Indivisible Load (AIL) deliveries, which would require a Road Safety Audit and Technical Approval via Detailed Design.	The NH response is noted and secured through the updated **oCTMP [REP3-075]**.	Agreed

Table 4.5 – Consultation

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

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