THE DROVES
SOLAR FARM

The Droves Solar Farm

Statement of Common Ground (SoCG) with Anglian Water Services Ltd (Tracked)

Prepared by: Raincloud Consulting
Date: October 2026
PINS reference: EN0110013
Document reference: APP/5.18.2 (Revision 2)
Infrastructure Planning (Examination Procedure) Rules 2010



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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~~is being submitted to the Examining Authority (the ExA) at Deadline 5 as a final position between both parties.~~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 Anglian Water (AW).

1.2.1 Collectively, the Applicant and AW 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 AW, in order to enable a~~ final position between both parties being ~~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 4 December 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 Anglian Water have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has included safeguarding existing water and sewerage assets and recognising regional water scarcity, and appropriate construction controls to protect public supply infrastructure.

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

Table 3.1 – Record of Engagement

Date	Form of Correspondence	Key topics discussed and key outcomes
4 December 2024	Written response to Scoping Opinion request	Key topics discussed: • Anglian Water Services Assets • Protection of Existing Infrastructure • Regional Water Resource Context • Water Resource Planning Key outcomes: • Utilities searches confirmed

		• A commitment to a 'Watching Brief' undertaken by a Hydrologist or Engineer where works occur near water infrastructure (e.g. during highway works)
		• The Scheme does not propose any groundwater abstraction.
		• Construction and operational water demand will be met via:
		  ○ Off-site water providers
		  ○ Temporary supplies (e.g. welfare, dust suppression)
		• Two dedicated firefighting water tanks will be provided onsite, avoiding reliance on groundwater abstraction
		• Anglian Water's reference documents (WRMP24, Water Resources East Plan) were acknowledged and considered within **ES Chapter 12: Water Resources [APP/6.2.3]**

09/07/2025	Statutory Consultation Response Letter	Key topics discussed: • Asset interfaces • Water supply and demand constrains • Groundwater and pollution risks • Drainage (SuDS) and fire water management • Foul water disposal options • Need for further assessments and engagement Key Outcomes: • Further collaboration with Anglian Water required • Mitigation and protections to be built into design and oCEMP • Additional plans / assessments needed • Constraints on water supply and sewer connections identified • Protective Provisions to be included in the DCO • Statement of Common Ground to be developed
February 2026	Written Relevant Representation	Key Topics discussed: • Water supply during construction ○ Queries regarding construction-phase water demand, particularly where non-domestic use could exceed

		20 m³/day, and the circumstances in which a Water Resources Assessment would be required.
		• Emergency water supply for BESS
		  ○ Concern that firewater volumes and refill rates were not clearly defined and that emergency arrangements might rely on public water mains where no mains are present.
		• Outcome – BESS firewater
		  ○ Applicant confirmed emergency firefighting water will be provided via dedicated on-site storage, filled and replenished by tankers, with no reliance on Anglian Water public mains.
		• Surface and foul water drainage
		  ○ Importance of securing SuDS design, containment and long-term maintenance, particularly for the BESS area.
		• Groundwater protection
		  ○ Requirement for robust pollution prevention measures to avoid impacts on groundwater and drinking water abstractions.
		• Pollution prevention
		  ○ Request for a clear Pollution Prevention Plan within the CEMP addressing water management and spill response.
		• Statutory apparatus protection
		  ○ Need to ensure Anglian Water assets are protected through agreed protective provisions in the DCO.
		• Engagement and consultation
		  ○ Ongoing dialogue supported, with Anglian Water identified as a consultee for drainage details rather than the full CEMP.
		
		Key outcomes:
		• Applicant confirms that construction water use from Anglian Water mains is not anticipated to exceed 20 m³/day, avoiding the need for a Water Resources Assessment.

		• No objection in principle, with Anglian Water's concerns addressed through clarified water supply arrangements and mitigation secured via the CEMP and DCO Requirements.
18/08/2026	Statement of Common Ground Correspondence	Correspondence via email to update the SoCG and additional commitments to the **outline Construction Environmental Management Plan (oCEMP) [APP/7.6.4]** and **outline Battery Safety Management Plan (oBSMP) [APP/7.14.2]** in regards to production of a Water Resources Assessment if required and firewater tank provisions.
07/10/2026	Statement of Common Ground Correspondence	Correspondence via email to confirm that AW are content with the updates made at Deadline 4 and that all concerns can be changed to agreed.

3.1.4 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Applicant and AW 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, that all ~~the~~ matters are agreed~~, under discussion, or not agreed~~ between the Applicant and AW at the point of this document being ~~published~~submitted.

~~4.1.1 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 Policy and draft DCO

Reference	Topic	Consultee's Position	Applicant's Position	Status
1-1	Protective Provisions in the DCO	The form of the protective provisions included in Part 8 of Schedule 15 to the **draft DCO [APP/3.1.4]** has now been agreed between the parties, and we informed the Applicant that we would withdraw our objection with regard to the protective provisions at Deadline 1. Anglian Water's response to ExQ1 [REP1-074] confirmed that Anglian Water is satisfied that its concerns have been appropriately addressed. Accordingly: • Anglian Water withdraws its objection to the Protective Provisions [Part 8 of Schedule 15]; and • Anglian Water confirms that the Protective Provisions for the Protection of Anglian Water, as currently drafted, do not require amendment	The form of the protective provisions included in Part 8 of Schedule 15 to the **draft DCO [APP/3.1.4]** has now been agreed between the parties, and Anglian Water withdrew its objection with regard to the protective provisions at Deadline 1.	Agreed
1-2	Planning Policy on Water Resources	EN-1 and EN-3 require NSIPs to demonstrate sustainable water supply without harm to existing users. NPPF requires safeguarding drinking water resources. AW ~~have~~ raised concerns that	The Applicant confirms that the Scheme does not anticipate to seek a non-domestic water supply from Anglian Water exceeding 20 m³/day. The **oCEMP [APP/7.6.4]** has been updated at	~~Medium~~Agreed

		water demand during construction and operation, especially where non-domestic demand may exceed 20 m^3/day, and therefore AW policy requires a Water Resources Assessment (WRA) above this threshold. In the event a WRA is necessary – this would be subject to internal review for a decision regarding whether the temporary supply of non-domestic water through the construction period is "acceptable in principle". Anglian Water cannot guarantee a maximum daily demand request for non-domestic water until this is formally applied for by the Applicant, through submission of a Pre-Planning Application, and once agreed, this is only valid for 12 months. Anglian Water welcomes the intention that tankering requirements for water usage during construction will not rely on our potable supply. We ~~would seek that this is formally stated~~support the inclusion of ~~as a~~ the commitment within the outline Construction Environment Management Plan (oCEMP) issued at Deadline 4.	Deadline 1 to confirm this, thereby removing the need for a Water Resources Assessment at this stage. The Applicant further confirms that water supply will be managed through a combination of Anglian Water mains, existing agricultural supplies and water tankering, in accordance with EN 1, EN 3 and NPPF policy on safeguarding water resources. Should the need arise for more than 20m^3 then a Water Resources Assessment will be undertaken prior to the construction phase, as committed to in the updated **oCEMP [APP/7.6.4]**. If tankering in of water is required, it will be sourced from suppliers that do not rely on Anglian Water's potable supply network. Tankered water is not anticipated to place additional demand on the Anglian Water supply area and therefore has not been included within the baseline assessment. A commitment has been made within the **oCEMP [APP/7.6.4]** at Deadline 4 that should additional non-domestic water supply from Anglian Water be required, a Water Resources Assessment will be submitted to Anglian Water.	
1-5	Pollution Prevention	AW raised concerns that a clear Pollution Prevention Plan (PPP) to protect groundwater is needed and require engagement at detailed design stage in align with NPPF para 180 and	The Applicant confirms that a Pollution Prevention Plan is secured via the **oCEMP [APP/7.6.4]**. The **oCEMP [APP/7.6.4]** has been updated at Deadline 1 to ensure Anglian Water is	Agreed

		Environmental Permitting Regulations managed via DCO. Anglian Water is supportive of the amendments to the oCEMP that ensure Anglian Water is consulted on the PPP prior to the commencement of construction.	provided with the Pollution Prevention Plan for review prior to commencement of construction. Pollution prevention measures are therefore embedded, enforceable through the DCO, and aligned with NPPF paragraph 180 and relevant environmental permitting controls.	

Table 4.2 - BESS / Fire Safety

Reference	Topic	Consultee's Position	Applicant's Position	Status
2-1	Firefighting Water Supply	AW has concerns that whilst the **oBSMP [APP/7.14.2]** refers to emergency water for fire containment and smoke suppression, **ES Chapter 12: Water Resources [APP/6.2.3]** does not clearly define the volume of firewater storage or refill rates and there are no existing Anglian Water mains within the BESS / solar array area, meaning any potable connection would require a formal application. Anglian Water ~~welcomes~~ supports ~~the stated intention to clarify the position~~the update to the oBMSP on firewater provision issued at Deadline 4.	The Applicant confirms that the volume of emergency water storage for firefighting at the BESS will be designed in accordance with NFCC guidance, as set out in the **oBSMP [APP/7.14.2]**. Firefighting water tanks will be filled initially by tanker and monitored remotely, with refilling undertaken as required by tanker supply. As such, a potable water connection to Anglian Water infrastructure is not required for firefighting purposes, and no reliance is placed on local water mains. This approach avoids the need for a formal Anglian Water connection and ensures adequate firewater provision for the BESS, which has been confirmed in an update to the **oBSMP [APP/7.14.2]** at Deadline 4.	AgreedLow

Table 4.3 - Construction

Reference	Topic	Consultee's Position	Applicant's Position	Status
3-1	CEMP	AW require the following within the construction phase: • Its underground water and sewer assets to be adequately protected during construction works; • AW would be consulted for surface and foul water drainage schemes associated with construction activities; • Adequate pollution prevention measures in place to protect groundwater and water resources; • Construction water demand would not adversely affect AW's ability to supply potable water; and • Appropriate controls would be secured through the Construction Environmental Management Plan (CEMP).	The Applicant confirms that construction phase controls are secured through the **oCEMP [APP/7.6.4]**. The **draft DCO [APP/3.1.4]** includes Anglian Water as a consultee for the discharge of surface and foul water drainage Requirement, ensuring protection of AW underground assets during construction. The **oCEMP [APP/7.6.4]** secures pollution prevention measures to protect groundwater and water resources, including a Pollution Prevention Plan. The Applicant also confirms that construction water demand is not anticipated to exceed 20 m³/day from Anglian Water supplies, thereby avoiding adverse effects on potable water supply. Detailed construction controls, as secured within the **oCEMP [APP/7.6.4]** will be submitted for approval prior to commencement, in consultation with Anglian Water where relevant.	Agreed~~Low~~

Table 4.4 - Water, Flood Risk and Drainage

Reference	Topic	Consultee's Position	Applicant's Position	Status

4-1	Flood Risk and Drainage	AW require the need for appropriate surface and foul water drainage arrangements and consultation at detailed design stage.	The Applicant confirms that Anglian Water is named as a consultee for the discharge of surface and foul water drainage Requirement (Requirement 11) within the **draft DCO [APP/3.1.4]**. A detailed drainage and SuDS strategy will be prepared post consent and submitted for approval in consultation with Anglian Water, ensuring appropriate management of surface and foul water during construction and operation.	Agreed
4-2	Drainage and Flood Risk Policy	On the policy basis of NPPF and National SuDS Standards and EN-1 requirement to manage flood risk and prevent pollution, AW raise the need for consultation on surface and foul water drainage. They highlight the importance of drainage design around BESS compounds, including firewater containment.	The Applicant welcomes Anglian Water's engagement and confirms that Anglian Water is named as a consultee for the discharge of surface and foul water drainage Requirement within the draft DCO. A detailed drainage and SuDS strategy will be provided post consent, including specific provision for the BESS and firewater containment, secured through the relevant DCO Requirement. This approach ensures compliance with national drainage and flood risk policy.	Agreed
4-3	Protection of Groundwater and Water Quality	AW have concerns there is a risk of contamination from solar infrastructure or materials with groundwater. AW require pollution prevention measures around source protection zones.	The Applicant confirms that solar PV infrastructure does not utilise PFAS coatings on the tempered glass surfaces and is unlikely to interact with subsurface groundwater. **ES Chapter 12: Water Resources [APP/6.2.3]** concludes that the Scheme does not present a significant risk of groundwater contamination. Pollution prevention measures are	Agreed

			secured through the **oCEMP [APP/7.6.4]** and embedded mitigation, ensuring groundwater and Source Protection Zones are protected in accordance with planning policy and regulatory requirements.	
4-4	Groundwater Protection and Source Protection Zones (SPZs)	AW identifies that the shallow groundwater near Marham boreholes are sometimes within 2 – 5 m of ground level. There are concerns of a risk of contamination from solar infrastructure or materials including PFAS. These concerns are in alignment with the Environment Agency (EA) groundwater protection policy, and NPPF para 174 – preventing pollution. AW supports the amendment in the **oCEMP [APP/7.6.4]** to clarify that all photovoltaic arrays/panels will be certified as PFAS free, to reduce the risk of PFAS entering ground or surface water.	The Applicant notes Anglian Water's comments on shallow groundwater conditions. The Applicant confirms that solar PV arrays do not utilise PFAS coatings on tempered glass surfaces and are therefore not expected to present a contamination risk. **ES Chapter 12: Water Resources [APP/6.2.3]** concludes that the PV mounting system is unlikely to interact with subsurface groundwater across the Order limits. Groundwater protection is further secured through embedded mitigation, the **oCEMP [APP/7.6.4]** and groundwater monitoring commitments, ensuring compliance with EA groundwater protection policy and NPPF paragraph 174.	Agreed
4-5	BESS Firewater Management	AW has concerns that whilst the outline Battery Safety Management Plan (oBSMP) refers to emergency water for fire containment and smoke suppression, **ES Chapter 12: Water Resources [APP/6.2.3]** does not clearly define the volume of firewater storage or refill rates and there are no existing Anglian Water	The Applicant confirms that firefighting water for the BESS will be provided via dedicated on site storage designed in accordance with NFCC guidance, as set out in the **oBSMP [APP/7.14.2]**. Firewater tanks will be filled initially by tanker and replenished as required via tanker supply. The **oBSMP [APP/7.14.2]** has been	Agreed~~Low~~

		mains within the BESS / solar array area, meaning any potable connection would require a formal application. AW require assurance that emergency water supply arrangements would not rely on public water mains. Anglian Water ~~welcomes~~ supports the ~~stated intention to clarify the~~updated position on firewater provision in the oBSMP issued at Deadline 4.	updated at Deadline 4 to commit to this provision. This approach provides clear assurance, as requested by AW, that emergency water supply arrangements will not rely on public water mains. The Scheme therefore does not rely on Anglian Water infrastructure for emergency firewater, and no potable water connection is required for BESS fire response.	

Table 4.5 - Impact on Existing Apparatus / Infrastructure

Reference	Topic	Consultee's Position	Applicant's Position	Status
5-1	Existing Water Mains and Sewers	AW identifies the presence of existing water mains and sewers within or close to the Order Limits and seeks assurance that construction and operation would not adversely affect its apparatus. Anglian Water has agreed Protective Provisions with the Applicant and formally withdrawn our objection at ExQ1.	The Applicant acknowledges the presence of Anglian Water water mains and sewers within and adjacent to the Order limits. The Applicant confirms that Anglian Water's apparatus will be protected through the Protective Provisions contained in Schedule 15, Part 8 of the **draft DCO [APP/3.1.4]**. In addition, construction activities will be managed through the detailed Construction Environmental Management Plan, as secured by the relevant DCO Requirement, with appropriate working methods, location checks and asset protection measures to prevent damage or interference. The Applicant confirms that Anglian Water is a named consultee for the drainage strategy	Agreed

			under Requirement 11 of the **draft DCO [APP/3.1.4]**, ensuring that construction and operation of the Scheme do not adversely affect Anglian Water infrastructure.	

5 Signatories

5.1 Overview

5.1.0 The above SoCG is agreed between The Droves Solar Farm Limited (the Applicant) and Anglian Water Services Limited, as specified below.

5.1.1 Duly authorised for and on behalf of **The Droves Solar Farm Limited**.

Name:	
Job Title:	
Date:	
Signature:	

5.1.2 Duly authorised for and on behalf of **Anglian Water Services Limited**.

Name:	
Job Title:	
Date:	
Signature:	

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