THE DROVES
SOLAR FARM

The Droves Solar Farm

Statement of Common Ground (SoCG) with Borough Council of King's Lynn and West Norfolk (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.

1.1.3 This document has been updated at Deadline 5 to reflect ongoing discussions. The document references have not been updated from the original submission. Please refer to the **Guide to the Application [APP/1.3.7]** for the list of current versions of documents.

1.2 Parties to this Statement of Common Ground

1.2.0 This SoCG has been prepared by the Applicant and Borough Council of King's Lynn & West Norfolk (KLWN).

1.2.1 Collectively, the Applicant and KLWN 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 KLWN, 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 100 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 19 September 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 KLWN have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has consisted of regular Microsoft Teams meetings.

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

Table 3.1 – Record of Engagement

Date	Form of Correspondence	Key topics discussed and key outcomes
19/09/2024	Teams Meeting	• Briefing and introduction to the Scheme.
20/01/2025	Teams Meeting	• Meeting to discuss the Landscape and Visual Impact Assessment, viewpoint locations and cultural heritage setting. • Stakeholders expressed support for the overall approach, which informed the Preliminary Environmental Information Report (PEIR).
03/03/2025	Teams Meeting	• Employment and Skills Workshop. • Stakeholders supported the approach and proposed a number of additional skills and initiatives for the final strategy.
30/05/2025	Group Site Visit	• Group Site visit led by the applicant with stakeholders from local councils and community groups, including representatives from KLWN. • The applicant led the group to a series of viewpoints to discuss potential visibility of the Scheme, presenting the PEIR visualisations and Photopanels as visual aids. • Discussion around potential siting of proposed development included within the PEIR, particularly around the potential removal of proposed National Grid and Customer

		Substations from Field 35, which was subsequently actioned.
16/06/2025	Teams Meeting	• Meeting with Principal Conservation Officer to discuss the findings of the PEIR, principal heritage concerns and potential mitigation.
20/08/2025	Teams Meeting	• Introducing the Scheme to Julie Barrow. • Cost Recovery.
21/08/2025	Teams Meeting	• Scheme update. • Summary of changes covered in targeted consultation.
03/06/2026	Teams Meeting	• Meeting to discuss: ○ Inclusion and discussion around potential new viewpoints within the LVIA. ○ SoCG point – Table 2, KLWN 2-1 Substation design/. ○ SoCG point – Table 2, KLWN 2-2 Lighting.
06/10/2026	Teams Meeting	• Meeting to discuss Heritage impacts following updated responses from Historic England

3.1.4 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Applicant and KLWN 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 KLWN at the point of this document being published.

4.1.1 Where discussions are ongoing, the Applicant has 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]**

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 1-1	Key Views	The Borough Council disagrees that the main views from Castle Acre's Castle are only to the east and west (third bullet point of 8.3.33 of Chapter 8 **[APP-057]** for example)) – We acknowledge that this may be a matter of how this has been phrased rather than a true inconsistency of view. The River Nar lies to the southeast, and looking over the bailey towards the river gives clear views of both the application site and Bartholomew's Plantation. This is mainly because the land slopes down to the river and rises again on the opposite side of the valley towards the site.	Both the **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** and **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP-152]** are clear that the topographic location of the castle in relation to the river valley, which includes elements to the east and west along with elements to the south, contribute to the significance of the monument. Therefore, it is not stated that the only views are to the east and west but that the elements that lie along that axis make the greatest contribution to the significance of the monument. Whilst views to the south of the castle are recognised as contributing to significance (e.g. fourth bullet point of paragraph 8.8.33 and paragraph 8.8.34 of **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]**, the parts of the Site that are visible from the monument (e.g. Bartholomew's Plantation and the fields to its north) do not contain elements that are considered 'key' to the understanding and appreciation of the monument. As such, the Site is not considered to make the same level of contribution to the significance of the Castle as other elements of its setting. It is agreed that these are matters that will need to be considered in the overall planning balance by the Secretary of State.	Not agreed
KLWN 1-2	Key Views	The Applicant has worked with the Borough Council's planning and heritage teams to reduce harm as much as possible. Moving the substations out of direct view from Castle Acre and placing them south of Bartholomew's Hill Plantation would not eliminate harm but would filter	There is no anticipated substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme. **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** outlines that 'substantial harm' is afforded to any adverse effect that is of a major magnitude, whilst moderate, minor or negligible adverse effects represent effects that are of 'less than substantial harm' in nature.	Not agreed

		views and lessen visual impact, subject to retention and adequate protection of Bartholomew's Hill Plantation given the identified screening benefits. Removing solar PV from the northern part of field 33 is also positive, as the topography means the remaining panels would sit beyond the crest and be barely visible.	As detailed in the submitted visualisations (**ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [REP3-058]** and **ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045]**), the National Grid Substation and the Customer Substation will be entirely screened by Bartholemew's Plantation in views from the north, thereby removing, rather than reducing, visual impact. As described in **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]**, new pylons will be visible, but not other elements of the National Grid Substation and the Customer Substation. It is agreed that these are matters that will need to be considered in the overall planning balance by the Secretary of State.	
KLWN 1-3	Level of harm outlined within ES Chapter 8	The Council disagree with the assessment and level of harm that has been attributed to the development within **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]**. The Council maintain that as an integral part of the significance of the Castle and Conservation Area at Castle Acre, this change in land use would result in less than substantial harm, moderate in scale, to the significance of the castle at castle acre and a moderate level of less than substantial harm to the setting of Castle Acre Conservation Area. The Council agree with the HE terminology used in describing the harm and as with HE disagree with the	The Applicant acknowledges that the Council do not wish to engage on this point further and it is the Council's final position. However, clarification on the terminology used by the Council in relation to that used in **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** would be welcomed. Discussions with Historic England have confirmed their position in regards to Castle Acre Castle and Castle Acre Priory is as follows: *Scenario A would represent a Low Magnitude impact as defined in the ES (at the upper end of that scale). In relation to the Castle and Priory (High Value assets) this would, result in a Moderate Adverse Effect which is significant in EIA terms.* *Under Scenario B the magnitude of impact would reduce to Low/Negligible resulting in a Minor Effect (not significant).* With regards to Castle Acre Conservation Area, Historic England have confirmed their position is as follows:	Not Agreed

		Applicant's assessment of the level of harm identified. As above, our comments and areas of agreement are all on the basis of retention of Barthomolew's Hill Plantation.	*In relation to Castle Acre Conservation Area it is agreed that it falls within the Medium Sensitivity category, but at the very upper end of that scale.* *The impact upon Castle Acre Conservation Area, a Medium Sensitivity Asset, would be of a Low/Negligible Magnitude resulting in a Minor Effect.* There remains a difference of opinion between the Applicant and Historic England upon the levels of effect, but it is considered useful to adopt the same terminology in describing magnitude of impact and levels of effect. The Applicant's view in terms of the scales of impact, as defined in **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]**, is that in order to be a moderate impact there would need to be considerable harm to a heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost. This is a relatively high level of impact which is not reflected by the Scheme, which would retain the village siting, the visual and spatial connection between the assets, the connection to the Peddars Way and the vast majority of the surrounding landscape visible from the heritage assets. The majority of views will be unchanged, with only very small elements of the wider Scheme remaining. Whilst the overall Scheme is large in scale the aspects of the settings of the designated heritage assets that will be subject to change have been minimised through embedded mitigation measures. The Applicant is satisfied that the levels of harm identified within **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** (Scenario A – Minor, Scenario B - Neutral) are robust and justifiable.	

Table 2 – Landscape and Visual

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 2-1	Substation design	The design of the substation and its infrastructure needs to be considered so that the highest parts are screened as far as possible by the plantation and should not be on its edges. The Council acknowledge that Bartholomew's Hill Plantation is outside of control of this application. Matters agreed are dependent on retention of this key landscape buffer and as it stands, we are concerned over the lack of controls over works to this woodland given its position outside of the order limits and lack of any legal protections through TPO or other mechanism.	The **ES Chapter 6: Landscape and Visual [AS-016]** outlines potential landscape and visual impacts as a result of the Scheme and **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** assesses impacts upon heritage assets as a result of the Scheme. Mitigation measures embedded into the Scheme have sought to ensure that potential visibility of the proposed larger elements of the Scheme, such as the National Grid and Customer Substations, are screened as much as possible through new tree, woodland and hedgerow planting. The exact detail and design of the Customer and National Grid Substations will be considered fully at the detailed design stage. Such measures are secured by the **Design Principles, Parameters and Commitments [APP/5.8.4]**, the spatial extents shown on the **Works Plan [REP3-004],**the **oOEMP [APP/7.8.4]** and the **oLEMP [REP3-069]**. It was agreed during the meeting on the 3 June 2026 between the Applicant and KLWN that the proposed levels of information for the substation is a matter for detailed design, once there is clarity on the scale and siting detail of the substations. It was discussed how outlined above that the design principals would seek to ensure the levels would limit adverse visual effects as much as possible. It	Not Agreed

			was agreed that the LPA are able to see this point resolved. It was noted at ISH3 that there are no known local protections in place for Bartholomew's Hill Plantation and other adjacent woodlands. However, the Applicant noted that key landscape features within the Order limits will be protected during the construction, operation and decommissioning phases of the Scheme through implementation of the **oLEMP [APP/7.11.2]**. Existing protections are also detailed in the **Arboricultural Impact Assessment [REP2-014].** The existing and proposed vegetation within the Order limits will be managed to encourage visual screening, as outlined within **the oLEMP [APP/7.11.2].** Bartholomew's Hill Plantation is not located within the Order limits and is, therefore, not within the Applicant's control (i.e. not able to be managed via the **oLEMP [APP/7.11.2]**). As with many other areas of woodland in the wider study area, there is no reason to suggest that Bartholomew's Hill Plantation would be removed. The Applicant understands that BCKLWN's position is that they suggest some form of protection should be secured to ensure the long-term protection of the landscape screening and Bartholomew's Hill Plantation. The Applicant reaffirms its assessed position of assuming that the woodland is not to be removed, as there is no reason to assume that it would be, and is proposing no additional measures to protect the woodland	

			(particularly given that the woodland falls outside of the Order limits and, therefore, is outside of the Applicant's control). Notwithstanding this, the Applicant has been informed by the landowner that the woodland falls within a Continuous Cover Forestry management plan that ensures that the plantation provides continuous tree cover and is cared for in a sustainable way that promotes the longevity of the woodland. The Applicant is advised by the landowner that a TPO is not necessary, given the current successful management of the woodland and the fact that the restrictions imposed by a TPO could in fact harm the health and longevity of the woodland due to the need to seek approval for much smaller works which could slow down efforts to ensure for e.g. diseased trees are removed in good time as part of natural regeneration. It is agreed that these are matters that will need to be considered in the overall planning balance by the Secretary of State.	
KLWN 2-2	Lighting	Care still needs to be taken in the lighting and boundary treatment of the infrastructure which still has the ability to be impactful in this landscape. The Council agree with commitment for lighting scheme within the **oCEMP [APP/7.6.4].**	The **ES Chapter 6: Landscape and Visual [AS-016]** outlines potential landscape and visual impacts as a result of the Scheme, para 6.7.23 states "*With regard to the consideration of lighting and subsequent mitigation measures, it is not considered likely that that the Scheme would result in any significant effects* through additional lighting". The **Design Principles, Parameters and Commitments [APP/5.8.4]** confirms that *"The Solar arrays will not be lit during the operational phase".* The Scheme would be largely unlit, with	Agreed

			the exception of the Customer Substation and National Grid Substation and within the BESS compound, which would only include motion sensing lighting and be used to maintain safe working conditions in winter months, security purposes, and maintenance activities as detailed within the **oOEMP [APP/7.8.4]** and **ES Chapter 5: The Scheme [REP1-032]**. Given the nature of these activities, it is not anticipated that there will be continuous flashing on and off of these lights. Lighting is not required within the Solar PV Site during the operational phase of the Scheme, with the exception of when panels could be cleaned at night, which may require lighting. Further, commitments to ensure that a detailed lighting scheme is developed as part of the detailed design have been made within the **oCEMP [APP/7.6.4]** and **oOEMP [APP/7.8.4].**	

Table 3 – Ecology and Biodiversity

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 3-1	BNG Metric	The BNG Metric should be updated to reflect the October 2025 publication of Local Nature Recovery Strategy – this is noted in the BNG report. This will affect all trees recorded in the baseline and the other neutral grassland being created post-development. The Biodiversity Net Gain Report identifies 37 veteran trees, but this is not	Specific consideration and assessment in relation to overall biodiversity value is set out within the **Biodiversity Net Gain Assessment Report [APP/7.4.2]**, using the government metric and associated guidance. The Applicant can confirm the number of veteran trees (along with their individual references) has been added into the user comments within the updated BNG metric. In relation to BNG, the	Agreed

		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. This item is agreed following review of most recent BNG metric received by email on 17 September 2026 **[AS-087]** .	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 [REP2-014]** is provided in order to allow comparison and cross-referencing of individual trees and to ensure consistency 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 [APP/7.4.2]**, the assessment was updated at Deadline 1. The **Biodiversity Net Gain Assessment Report [APP/7.4.2]** was undertaken within the government's metric template, which is published in Excel format. The Applicant has shared this document with the Council.	
KLWN 3-2	Bats	Comments received within Relevant Representations acknowledge the bat survey work undertaken but raise concerns regarding the level of detail within the analysis reported. The Council add within their **Local Impact Report [REP1-076]** at 3.3.1 that they want further information on commuting corridors during construction,	The Applicant considers that the analysis undertaken is sufficient in order to adequately assess the potential impacts on bats as a result of the Scheme, and the information provided (**ES Appendix 7.2: Baseline Ecological Survey Report [APP-148]** and **ES Chapter 7: Ecology and Biodiversity [REP3-038]**) demonstrates that the key corridors and areas will remain unlit and strengthened with additional planting (as secured by the **oLEMP [REP3-069]**). Commitments to ensure that a detailed lighting scheme is developed as part of the detailed	Agreed

		operation and decommissioning, as well as measures to prevent lighting impacts.	design have been made within the **oCEMP [APP/7.6.4]** and **oOEMP [APP/7.8.4]** to ensure that the associated areas used by raised numbers of bats remain unlit, subject to which the location of the BESS and substation within the internal areas of Fields 24 and 27 will not be adversely affected.	
KLWN 3-3	Badgers	On the basis of fencing retaining key wildlife corridors in the field margins, no significant adverse impact has been identified on badgers.	This is noted by the Applicant	Agreed
KLWN 3-4	Wintering Birds	The magnitude of impact on wintering bird populations would be negligible.	This is noted by the Applicant	Agreed
KLWN 3-5	Skylark Mitigation	The Council raise concerns regarding the methodology behind the plots provided for skylark mitigation at points 3.3.7 and 3.3.8 of the **Local Impact Report [REP1-076].** The Council note that this point is under discussion whist their ecologist considers further.	As set out within the **ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP-149]**, the methodology used in relation to calculation of Skylark mitigation follows the approach set out within published methodology (Fox, 2022). As set out, the initial input figure of 117 pairs has been used in relation to the development footprint (i.e. excludes the 4 pairs within field 32 which is outside of the Scheme's boundary but includes the existing pairs within fields 33 and 35 and as such these are taken into account). In relation to territories that could be absorbed within 75m of the development edge habitats, in line with the published methodology this relates to an increase in capacity over the existing use due to increased foraging habitat in proximity to the edges of the development and accordingly, the exclusion of the existing pairs within field 32 from the calculations	Agreed

			is no different from that within surrounding fields elsewhere, which would be anticipated to support a baseline of Skylark usage, and therefore consistent with the published methodology.	
KLWN 3-6	Impact on Protected Sites	Subject to compliance with the outline Construction Traffic Management Plan and outline Construction Environmental Management Plan, the Council raises no objection in regard to impacts on Protected Sites.	This is noted by the Applicant	Agreed
KLWN 3-7	Request for Habitat Monitoring and Management Plan	The Council request for a Habitat Monitoring and Management Plan to be secured through the DCO, notwithstanding the outline LEMP already submitted.	This is noted and agreed by the Applicant	Agreed

Table 4 – Land Use / Agriculture/Soil

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 4-1	BMV Land	This Scheme would result in approximately 55% of the site falling within the definition of Best and Most Versatile (BMV) agricultural land. Whilst the 60 year decommissioning timeframe set out by Requirement 20 is noted, the loss of BMV, particularly in combination with other schemes across Norfolk as a	The effects on land of BMV quality, and the small areas adversely affected, are set out in **ES Chapter 11: Soils and Agriculture [AS-080]**. There is no policy that requires agricultural land of BMV or non-BMV quality to be farmed, and the implications for food production and the local land-based economy are set out in **ES Chapter 11: Soils and Agriculture [AS-080]** sections 11.8 and 11.11.	Not Agreed

		whole is a concern for the Borough Council.	**ES Chapter 11: Soils and Agriculture [AS-080]** concludes that, with embedded and additional mitigation measures in place, the Scheme itself would not result in any significant adverse effects on soil or agricultural land resources throughout its lifecycle. There will be some permanent land take associated with the National Grid Substation and Grid Connection Infrastructure, but this only amounts to less than 5 ha of BMV land. A worst-case assessment is also set out should the BESS and Customer substation not be restored. The loss in that case would exceed 20 ha, but even with woodland planting it would amount to 27ha of BMV (11.8.52). In terms of cumulative effects, four NSIP schemes were identified near the Scheme, two of which were for solar development, and these are assessed in Chapter 11 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. The Applicant's **Update Note on Published Information and Cumulative Assessment on Agricultural Land Quality [REP1-072]** provides information about the new Predictive Agricultural Land Classification Map for England (Defra, April	

			2026) and also assesses a wide range of other developments across Norfolk. This information has been updated further and was incorporated into a revised Chapter 11 for Deadline 3. The revised **ES Chapter 11: Soils and Agriculture [AS-080]** also updates the position following the publication of the new Predictive ALC Map for England, available since May 2026. As set out in Chapter 11 at 11.6.10 et seq, and in the update at 3.3 to 3.9, the predictive map now predicts that most of the agricultural land in Norfolk is BMV. The cumulative effect of the Droves, the other NSIP schemes in Norfolk, the long-list of other developments and the Draft Housing Allocations (which involve a collective loss of over 500ha of BMV) would be a land-use change involving under 1% of Norfolk (0.96%). 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 ha 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 11.8.79 to 11.8.87. In the document entitled 'The Agricultural Land Use in England at 1 June 2026', published by Defra on 24 June 2026, the arable land area used for agri-environmental uses across England had	

			increased to 484,398 ha, up from 444,000 ha in 2025. There are approximately 799ha of agricultural land within the Order Limits (BMV and non-BMV) (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. The un-cropped arable land in Breckland and South Norfolk in 2025 (19,583 ha) was almost 25 times larger than the 799 ha of agricultural area at The Droves. The equivalent figure for Norfolk (42,821 ha) was over 53 times the 799 ha of the Site. The implications for food production, the lack of policy and initiatives requiring agricultural land to be used for food production, the continued potential for the land to be farmed for sheep grazing and the need for land management and panel maintenance work, and the need for renewable energy, will all need to be balanced. It is agreed that these are matters that will need to be considered in the overall planning balance by the Secretary of State.	

Table 5 – Transport and Access

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 5-1	Access	Whilst the site could be accessed via the A1065 from the north, the minimal level of traffic indicated as likely from this direction, plus the controlled site/delivery hours, would mitigate traffic noise impacts.	The Applicant notes that the Borough Council has agreed with the proposed site access. The routing for HGVs as presented in the **oCTMP [AS-082]** will be secured by way of a requirement in the DCO to ensure that the traffic impacts remain appropriately mitigated. **ES Chapter 10: Noise and Vibration [REP3-030]** concludes traffic noise effects to be not significant based on the HGV routes and delivery hours as detailed in the **oCTMP [AS-082]**. The routes and delivery hours will be detailed in the CTMP and secured by way of a requirement in the **draft DCO [APP/3.1.4]**.	Agreed
KLWN 5-2	Construction Traffic	The site includes several public recreational routes that connect to or pass through the KLWN area and can be used by residents. These include the Rebellion Way Cycle Route, Castle Acre Circular Walk, and the Peddars Way and Norfolk Coast Path National Trail. Banksmen will be present where construction traffic crosses these routes to warn users of vehicle movements, stop construction traffic when necessary, and allow the public to pass safely through gated crossing points. Construction noise may be experienced by route users, but this will be brief and	The Applicant notes that the Borough Council has agreed with the proposed construction access. The mitigation measures for construction traffic as presented in the **oCTMP [AS-082]** will be secured by way of a requirement in the DCO to ensure that the traffic impacts remain appropriately mitigated.	Agreed.

		temporary while they pass through the area and is not considered a concern.		
KLWN 5-3	Dust	The wheel washing facilities and Dust Management Plan secured in the oCTMP and oOEMP mean that dust from vehicles leaving the site will be minimal, and the surrounding road network is unlikely to generate dust that could affect nearby homes. Given the distance between the site and residential areas, and that dust is mainly limited to internal haul and access roads, the Borough Council confirms that it has no concerns over dust amenity impacts.	The Applicant notes that the Borough Council has no concerns regarding dust amenity**.** Appendix 1: Construction and Decommissioning Phase Dust Assessment has been produced to determine the level of mitigation required to control dust and particulate matter emission for inclusion in the **oCEMP [APP/7.6.4].** submitted as part of the DCO Application. Dust emissions associated with construction activities will be controlled through mitigation measures outlined in the **oCEMP [APP/7.6.4].** With the inclusion of the mitigation outlined in the **oCEMP [APP/7.6.4]** and the **oDS [REP3-067]**, potential dust emissions associated with on-site activities during the construction and decommissioning phases are not anticipated to be significant.	Agreed

Table 6- Cumulative Assessment

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 6-1	Methodology of Assessment	KLWN agrees with the methodology applied to the cumulative assessment within the ES	The parties are in agreement with the point outlined.	Agreed

KLWN 6-2	List of Committed Developments	KLWN agrees with the list of committed developments included within the ES cumulative assessment	The parties are in agreement with the point outlined.	Agreed

Table 7- Impacts on RAF Marham

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 7-1	Impacts on RAF Marham	The Council are content with the proposals for a Glint and Glare Management Plan as part of DCO requirements. Concern remains in regard to PAR mitigation and as it stands, they do not have sufficient information to consider this further. They await an update as per discussion at ISH2/3.	The Applicant welcomes the agreement from the Council in relation to the proposal for a Glint and Glare Management Plan (which will be secured via a Requirement in the **draft DCO [APP/3.1.5]**). In relation to PAR mitigation, technical modelling has now been undertaken by the Ministry of Defence (MoD) to identify the areas within the Site that could potentially interfere with the Precision Approach Radar. These areas have been identified, agreed with the Applicant and presented on the **RAF Marham Mitigation Areas Plan [APP/8.26.1]**. The parameters and commitments for the PAR Mitigation are detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**. The PAR Mitigation will be up to a maximum height of 4.5m, located within Work No. 1(a) only (see also the **Works Plan [REP3-004])**, and have maximum foundations no greater than those proposed for the piled mounting structures (4m below ground level). The PAR Mitigation will consist of either a	Under Discussion

			fence and/or a bund. There is a potential third option, which is the removal of PV panels in some or all of the affected areas, as shown on the RAF Marham Mitigation Areas Plan **[APP/8.26.1]**; however, the Applicant does not expect to utilise this option unless absolutely necessary (i.e. only if the PAR Mitigation solution cannot be agreed with the MoD and the relevant planning authority). The Applicant will engage with the MoD regarding the PAR Mitigation ahead of detailed design, as secured through a Requirement within Schedule 2 of the draft DCO **[APP/3.1.5]**. The wording of this requirement has been fully agreed with the MoD.	

Table 8- Impacts on Amenity

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 8-1	Operational Noise	The Council request confident data that the significance of operational noise impacts are accurately modelled and are sufficiently low that they will remain negligible under all weather conditions throughout the life of the project, and will not impact those properties which might experience lower background noise levels at night than those reported in the Baseline Noise Survey.	Noise assessment presented in **ES Chapter 10: Noise and Vibration [REP3-030]** and **Technical Appendix 10.3: Construction and Noise Modelling [APP-166]** is based on representative baseline noise levels determined using a robust survey methodology agreed in consultation with the Breckland Council. The background levels are presented in **Technical Appendix 10.2: Noise Survey [APP-165]** and are considered to be representative of all neighbouring receptors. The	Agreed

			assessment adopts conservative assumptions such as worst-case predictions with all equipment operating at 100% capacity, no shielding by machines, and downwind windy weather conditions. Therefore, the noise levels presented in the assessment are worst-case, which are not significant in EIA terms for both day and night at all neighbouring receptors (noise levels and effects will be even lower at further away receptors). Receptors within the King's Lynn and West Norfolk Council area are located more than 1km from the Solar PV fields and more than 1.7km from the proposed substations and BESS area. Noise contours illustrated in **Figure 10.3.1** in **Technical Appendix 10.3: Construction and Noise Modelling [APP-166]** show that predicted levels are expected to be notably below 30dB(A) at these distances and therefore low in absolute terms and not significant regardless of baseline noise levels based on the criteria set out in **Table 10.5** of **ES Chapter 10: Noise and Vibration [REP3-030]**. Given the conservative assumptions inherent in the assessment methodology, the Applicant is confident that operational noise effects from the Scheme will be non-significant in EIA terms at all neighbouring receptors including those within the King's Lynn and West Norfolk Council area.	
KLWN 8-2	Dust Monitoring	The Council request dust monitoring for the nearest sensitive receptors within the CEMP.	Appendix 1 of the **oCEMP [APP/7.6.4]** commits to monitoring of dust at nearby receptors as part of a future Dust Management Plan.	Agreed

		Table 1.9 of theDust Assessment within Appendix 1 of the oCEMP only lists the potential receptors, without plotting them spatially or providing grid references. These should be mapped and agreed with the Local Authorities.	The oCEMP has been updated at Deadline 3 to review and commit to providing grid references for dust sensitive receptors, to be agreed with the Local Authorities, as part of the detailed CEMP.	
KLWN 8-3	Operational Lighting	The Council state that operational lighting is not expected to result in neighbour amenity concerns within their borough.	This is noted by the Applicant.	Agreed
KLWN 8-4	Contamination	The Borough Council note and support the addition of text regarding a watching brief throughout the construction phase to monitor for any unexpected contamination, and a Discovery Strategy the details of which will be confirmed in the detailed CEMP. The proposals for an unexpected contamination protocol to be provided in the detailed CEMP are also supported.	The Applicant notes this comment and considers the lack of impact from contamination and to monitor unexpected contamination are agreed.	Agreed
KLWN 8-5	Impacts on noise and residential amenity during construction.	The Council raise no objection on noise or residential amenity grounds on the basis of the measures within the Outline Construction Environmental Management Plan (oCEMP), which will be secured as final document by a requirement of the DCO.	This is noted by the Applicant.	Agreed

KLWN 8-6	Air Quality and Construction Traffic	The Council agree that the construction traffic levels in their area are less than the IAQM screen for further air quality assessment. Therefore, as long as the CTMP is implemented as set out, they have no objection.	This is noted by the Applicant.	Agreed

Table 9- DCO

Reference	Topic	Consultee's Position	Applicant's Position	Status
KLWN 9-1	Definition of 'Permitted Preliminary Works'	The Council raise concerns that the definition of 'Permitted Preliminary Works' in the context of the draft DCO has the opportunity to allow significant works, for example to pylon lines or site clearance before the detail of works or management plans have been confirmed. The Council suggest that where permitted preliminary works have the potential to impact upon available or appropriate mitigation, the definition of Commencement within each requirement is qualified appropriately. For example, a sub-paragraph could be added to Requirements 7, 9, 10, stating that 'For the purposes of subparagraph (1), "commence" includes any permitted preliminary works.' The Council also suggest that any advanced planting is specifically included as a 'permitted preliminary work'.	Rather than update the Requirements suggested by KLWN individually, in relation to permitted preliminary works, the Applicant submitted a **Permitted Preliminary Works Environmental Management Plan [REP4-038]** at Deadline 4. This sets out the methodology to be used for any permitted preliminary works, which the Applicant trusts will address the concern of KLWN in this regard. In anticipation of this plan, the Applicant updated Requirement 13 in Schedule 2 of the **draft DCO [APP/3.1.5]** at Deadline 2 to require that the permitted preliminary works are carried out in accordance with the **Permitted Preliminary Works Environmental Management Plan [REP4-038]**. The Applicant does not consider that the proposed amendment to the definition of	Under Discussion

		The latest update is that the Council confirm receipt of the permitted preliminary works environmental management plan (PPWEMP) and will comment on this as part of our response to Deadline 5.	"*permitted preliminary works*" is necessary. The planting mitigation is secured via the **oLEMP [REP3-069]** and this includes details (at Appendix 3) of the advanced planting (totalling 2.8km) that has already taken place in winter 2025/26. The Applicant awaits the Council's comments on the **Permitted Preliminary Works Environmental Management Plan [REP4-038]** submitted at Deadline 4.	
KLWN 9-2	Definition of maintain	For the avoidance of doubt, the Council also suggest that the definition of Maintain is amended, to state 'inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace and improve any part of, but not remove, reconstruct or replace the whole of, the authorised development and "maintenance" and "maintaining" are to be construed accordingly;'.	The Applicant does not consider that the proposed amendment to the definition of "*maintain*" is necessary. The Applicant has fully assessed the complete replacement of the solar panels, meaning the definition of "*maintain*" is not required to be amended to exclude this. The Applicant also refers to the **Applicant's Response to Deadline 4 Submissions [APP/8.28]** and the **Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO [APP/8.30]** where it addresses this point in further detail. The Applicant accepts that the parties will 'agree to disagree' on this matter.	Not agreed
KLWN 9-3	Details of Soft Landscaping	In relation to Schedule 2, Requirement 5 and whilst the requirements of the Landscape and Ecological Management Plan controlled by Requirement 7 are noted, the Council suggest that given the importance of landscape	The Applicant does not consider that the proposed amendments to Requirement 5 are necessary. The drafting is well-precedented across made solar DCOs and, as KLWN rightly points out, the	Agreed

		screening, that this provision should be reworded to include specific details of soft landscaping. It is assumed that any bunds required would be fully detailed as part of para 5.c.	relevant landscaping requirements are secured via Requirement 7 – indeed, Requirement 7 states that no part of the Scheme may commence until a written landscape and ecological management plan (which must be substantially in accordance with the **oLEMP [REP3-069]**) has been submitted to and approved by the relevant planning authority. The Applicant does not consider it necessary to duplicate the drafting by updating Requirement 5 as proposed. In relation to KLWN's final point, regarding bunds, the Applicant notes that mitigation in relation to Precision Approach Radar interference (in respect of the three specific mitigation areas agreed with the Mininstry of Defence, shown on the **RAF Marham Mitigation Areas Plan [APP/8.26]** submitted at Deadline 4) would take the form of bunds and/or fences at detailed design stage. This mitigation will be secured through a Requirement in the **draft DCO [APP/3.1.5]** and the Applicant updated the **Design Principles, Parameters and Commitments [REP4-019]** (which, in turn, are secured via the **draft DCO [APP/3.1.5]**) at Deadline 4 to include commitments in relation to these bunds and/or fences.	

KLWN 9-4	Protection of vegetation outside of the Order Limits	In Regard to Schedule 1, Part 6, Article 40, the Council has serious concerns with the flexibility provided by the current wording in regard to felling or lopping of trees and removal of hedgerows outside of the order limits. The Council requests that the wording is amended to remove ambiguity and scope of allowances of the phrase 'near to any part of the authorised development' and suggest the wording is revised to that which reflects that of the Springwell DCO granted in April 2026, or similar.	The drafting in Article 40 of the **draft DCO [APP/3.1.4]** reads "*near any part of the authorised development*". The meaning of 'near' is ascertained through the context of the remainder of paragraph (1). In order to have the power to lop a tree or shrub, the Applicant must reasonably believe it necessary to do so because of obstruction or interference with the construction, maintenance or operation of the Scheme, is a danger to persons using the Scheme, or obstructs construction vehicles. The tree must therefore be of such proximity to the Order limits that it is causing such an interference and would therefore only apply to trees that are effectively adjacent to the Order limits, rather than anything broader. If this wording was amended, an unhelpful situation could arise – for example, a tree could become damaged such that it is liable to fall towards the Scheme, presenting a danger to persons using the Scheme; however, that tree could, until it falls, remain wholly outside the Order limits. It is considered preferable to restrict the ambit of this power by reference to the harm that the tree is causing, as opposed to restricting the power geographically. The Applicant also refers to the **Applicant's Response to Deadline 4 Submissions [APP/8.28]** and the **Applicant's Response to the Examining Authority's Schedule**	Not agreed

			of Changes to the draft DCO [APP/8.30] where it addresses this point in further detail. The Applicant accepts that the parties will 'agree to disagree' on this matter.	

THE DROVES
SOLAR FARM