THE DROVES
SOLAR FARM

The Droves Solar Farm

Statement of Common Ground (SoCG) with Defence Infrastructure Organisation (Tracked)

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Date: October 2026
PINS reference: EN0110013
Document reference: APP/5.22.1 (Revision 1)
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) ~~where agreement has been reached between the parties, and where agreement has not yet been reached~~at Deadline 5 as a final position between both parties, reflecting that all matters are agreed.

1.2 Parties to this Statement of Common Ground

1.2.0 This SoCG has been prepared by the Applicant and Defence Infrastructure Organisation (DIO), Safeguarding Department (representing the Ministry of Defence (MOD)).

1.2.1 Collectively, the Applicant and the MOD 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 the MOD, in order to enable a~~ final ~~version to be~~position between both parties, reflecting that all matters are agreed, being 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 July 2025.

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 the MOD have engaged extensively throughout the Environmental Impact Assessment stages of the Scheme. The key engagement has included discussions regarding Glint and Glare, and impacts upon Precision Approach Radar (PAR).

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

Table 3.1 – Record of Engagement

Date	Form of Correspondence	Key topics discussed and key outcomes
06/06/25	Email	The Defence Infrastructure Organisation (DIO) was contacted by email as part of statutory consultation
31/06/25	Email	Initial contact made with the DIO to arrange a meeting.
01/08/25	Email	MOD provided safeguarding maps for RAF Marham.

15/08/25	Videoconference	MOD concerns regarding Glint and Glare and the PAR were discussed. It was agreed that further analysis would be conducted by the Applicant to investigate impacts.
03/09/25	Email	The Applicant requested further information relating to the PAR, in order to enable further analysis and requested information on the dimensions of circuits/flightpaths to be assessed for Glint and Glare.
16/10/25	Email	Details of the Glint and Glare receptors to be assessed were provided to the Applicant by the MOD. It was advised that internal engagement was ongoing with the radar engineers to determine details of the PAR.
02/02/26	Email	The Applicant shared the updated Glint and Glare modelling with the MOD. Details of the PAR were again requested. MOD acknowledged receipt of the additional modelling and the ongoing request for further details on the PAR.
09/02/26	Email	MOD responded with queries on the additional Glint and Glare modelling and requested further details.
23/02/26 - 26/02/26	Telephone and email	The additional Glint and Glare modelling was discussed, and further details were provided by email regarding the visibility of the Air Traffic Control tower. Full modelling data for all receptors was provided to the MOD.
27/02/26	Relevant Representation	Relevant Representation submitted by the MOD, detailing concerns with regard to the PAR, glint and glare, aerodrome height safeguarding, and bird wildlife hazard.

23/04/26	Email	The Applicant followed up on its request for data relating to the PAR, and shared a set of assumptions which had been made for initial analysis.
01/05/26	Email	The draft Statement of Common Ground was shared by the Applicant with the MOD for their comment. The Applicant requested a meeting to further discuss the outstanding issues.
06/05/26	Email	The MOD confirmed receipt of the draft Statement of Common Ground and advised that they would review this prior to Deadline 1.
13/05/26	Email	The Applicant followed up on the request for the PAR data and invited the MOD to suggest a date for a meeting following the Issue Specific Hearing.
14/06/26 - 26/05/26	Telephone and email	The Applicant regularly followed up by email and telephone to attempt to arrange a meeting with the MOD.
28/05/26	Email	The Applicant followed up on the proposed meeting and the Statement of Common Ground.
01/06/26	Email	PAR data was provided by the MOD to the Applicant, and a video meeting was organised to be held on 3 June 2026.
June – October 2026	Emails and calls	Various emails and calls between the parties in relation to the requirements sought in the **draft DCO [APP/3.1.5]** by the MOD, all of which are now agreed.

3.1.4 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Applicant and the MOD 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~~ that all matters are agreed~~, under discussion, or not agreed~~ between the Applicant and the MOD 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].~~

Reference	Topic	Consultee's Position	Applicant's Position	Status
1-1	Aerodrome Height Safeguarding	Based upon the information submitted about the general layout and scale of the proposed development, it is not anticipated that it will cause any physical impacts upon aerodrome height safeguarding requirements. However, before any electrical work begins, up to 10 new pylons will be built along the proposed diversion route leading into the new National Grid Substation along with potentially temporary pylon structures. The applicant is currently engaging with National Grid over the reconfiguration of the overhead transmission line. Once the transmission line details are available, the MOD will need to be consulted to enable a detailed assessment of the temporary and new pylon structures to be undertaken, details of the locations and height of each electricity transmission tower and associated cable will be needed.	The Applicant agrees that it is not anticipated that there would be any vertical infringement of aerodrome height safeguarding requirements and will consult with the MOD once the transmission line details are available, as secured through the ~~updated~~ **oCEMP [APP/7.6.5~~1~~]**. The Applicant and the MOD have also agreed a form of wording for a requirement in the **draft DCO [APP/3.1.5]** in relation to this matter, which the Applicant has included in its update to the **draft DCO [APP/3.1.5]** at Deadline 5.	
1-2	Construction Management Plan	In addition, the possible use of cranes, high reaching plant equipment or temporal structures that may be used during the construction and decommissioning phases of the proposed development may introduce physical obstruction hazards to aerodrome operations or might impact upon the effective operation of the PAR. It will therefore be necessary for any DCO that may be granted to contain a requirement for a construction management plan to be	The Applicant ~~has~~, at the MOD's request, updated the **oCEMP [APP/7.6.5~~1~~]** at Deadline 1 to clarify that the Applicant will consult with the MOD regarding the design methodology for the possible use of cranes, high reaching plant equipment or temporal structure during the construction phase of the Scheme. The Applicant and the MOD have also agreed a form of wording for a requirement in the	~~Medium~~

		submitted prior to construction and decommissioning works being undertaken.	**draft DCO [APP/3.1.5]** in relation to this matter, which the Applicant has included in its update to the **draft DCO [APP/3.1.5]** at Deadline 5.~~The Applicant, therefore, does not consider that a separate requirement in Schedule 2 of the **draft DCO [APP/3.1.1]** is necessary for this provision to be secured, but is in discussions regarding this matter with the MOD.~~	
1-3	Precision Approach Radar	The MOD, has determined that due to the metallic content and highly reflective nature of the materials used in the construction of the arrays, those areas of PV arrays that will be in radar line of sight to the PAR will be a source of multi-path reflections of the radars transmissions. This would cause interference to the PAR impacting upon its ability to accurately detect and track aircraft during critical stages of their approach to runway 23.	~~The Applicant is conducting further analysis of potential impacts upon the Precision Approach Radar (PAR) at RAF Marham. The results of this analysis will be used to engage further with the MOD in order to resolve this matter.~~ ~~Technical details of the PAR have been requested from the MOD in order to enable this analysis to be conducted as accurately as possible.~~The Applicant and the MOD have agreed a form of wording for a requirement in the **draft DCO [APP/3.1.5]** in relation to this matter, which the Applicant has included in its update to the **draft DCO [APP/3.1.5]** at Deadline 5.	~~Medium~~
1-4	Glint and Glare	The MOD has concerns that its air traffic control staff in the ATCT could be subject to the effects of glare from this development and that glint or glare effects might impact on some aviation procedures. Therefore, it is considered necessary that a glint and glare management	The Applicant and the MOD have agreed a form of wording for a requirement in the **draft DCO [APP/3.1.5]** in relation to this matter, which the Applicant has included in its update to the **draft DCO [APP/3.1.5]** at Deadline 5.~~The Applicant has~~	~~Medium~~

		plan is secured via a Requirement which would provide means to address any such adverse effects that might arise.	~~conducted modelling which identifies that short durations of 'yellow' glare are predicted towards sections of the visual circuits for both fixed and single axis tracking panel options. 'Yellow' glare is also possible towards vertical landing pads from fixed panels only. This glare is considered likely to be operationally accommodatable without the need for additional mitigation.~~ ~~Glare is also predicted towards the ATCT tower, for fixed panels only. Full modelling data has been provided to the MOD and this matter is under discussion.~~ ~~The Applicant therefore does not believe that a Glint and Glare Management Plan is necessary.~~	
1-5	Birdstrike Safeguarding	The proposed development is within the area surrounding the aerodrome which is safeguarded to manage birdstrike hazard to air traffic using RAF Marham. Within this area the principal concern of the MOD relates to the creation of new habitats which may attract and support populations of large and/or flocking bird species hazardous to air traffic. The development for which consent is sought includes provision to create field habitats for skylark and curlew to offset existing habitats that will be lost to the development. Proposed wetland features are shown in proximity to the mitigation areas for nesting birds which might consist of swales or potentially an open water	The Applicant acknowledges that the Scheme is within RAF Marham's wildlife hazard safeguarding area and could therefore impact upon birdstrike risk at the aerodrome if hazardous birds were to be attracted to the site. The Applicant agrees to consult with the MOD on birdstrike safeguarding measures (including siting, design and management of any berms, swales, ponds, surface water drainage systems, storm water attenuation systems including storage basins and channels or other wetland features, as requested by the MOD) before construction and during	~~Medium~~

		body. As such these should be designed to limit the attractants, they may provide to hazardous birds to maintain air traffic safety. It is possible that other waterbodies or wetland features that may be created as part of the development scheme may also provide an attractant to large and or flocking birds. At this stage details of the water bodies or wetland features that will be created to manage drainage are not provided. Accordingly, the MOD considers it necessary that provision is made in any DCO that may be granted to ensure that the MOD is consulted upon the siting, design and management of any berms, swales, ponds, surface water drainage systems, storm water attenuation systems including storage basins and channels or other wetland features that may be included in the development, to ensure these will not introduce a birdstrike hazard to aircraft operating at RAF Marham. To implement this, the MOD considers it appropriate to include a requirement in any DCO that may be granted.	operation, and the Applicant has therefore updated the **oOEMP [~~APP/7.8.1~~APP/7.8.5]** and the **oCEMP [APP/7.6.5~~1~~]** to reflect this. The Applicant and the MOD have also agreed a form of wording for a requirement in the **draft DCO [APP/3.1.5]** in relation to this matter, which the Applicant has included in its update to the **draft DCO [APP/3.1.5]** at Deadline 5.~~The Applicant, therefore, does not consider that a separate requirement in Schedule 2 of the **draft DCO [APP/3.1.1]** is necessary for this provision to be secured, but is in discussions regarding this matter with the MOD.~~	

5 Signatories

5.1 Overview

5.1.0 The above SoCG is agreed between The Droves Solar Farm Limited (the Applicant) and the Defence Infrastructure Organisation, 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 the **Defence Infrastructure Organisation**.

Name:	
Job Title:	
Date:	
Signature:	

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