THE DROVES
SOLAR FARM

The Droves Solar Farm

Statement of Commonality (Tracked)

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1 Introduction

1.1 Overview

1.1.1 This Statement of Commonality has been prepared as part of the application for a Development Consent Order (DCO) (the DCO Application) for The 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.

1.1.2 This document provides the Examining Authority (the ExA) with the latest position on the Statements of Common Ground (SoCG) between the Applicant and relevant consultees and Interested Parties in relation to the Scheme. This Statement of Commonality will be updated at each Deadline throughout the course of the Examination, as a record of progress being made with the SoCG parties.

1.1.3 This document has been updated at Deadline ~~4~~ 5 to reflect the latest positions of the Statements of Common Ground submitted at this Deadline. The document references have not been updated from the original submission. Please refer to the **Guide to the Application [APP/1.3.~~6~~7]** for the list of current versions of documents.

1.2 Structure of the Statement of Commonality

1.2.1 This Statement of Commonality document is structured as follows:

- Section 2 details the structure of each SoCG document and provides a list of the SoCGs that have being produced to date;
- Section 3 addresses the current status of each SoCG; and
- Section 4 sets out the commonality between topics covered in SoCGs.

2 Position

2.1 Structure of the SoCGs

2.1.1 Each SoCG adopts a standard format to ensure consistency in the approach taken to documenting the matters agreed, matters subject to ongoing discussion, or matters that are not agreed upon.

2.1.2 Each of the SoCGs are structured in the following way:

- Section 1 provides an introduction to the SoCG, including a description of the document and the relevant SoCG party;
- Section 2 provides a description of the Scheme;
- Section 3 provides a summary of engagement between the Applicant and the relevant party so far; and
- Section 4 details those matters agreed, those matters under discussion and those matters which have not been agreed.

2.2 List of SoCGs

2.2.1. Following continuous and ongoing engagement with relevant statutory and non-statutory consultees, the Applicant prepared eleven SoCGs which were submitted at Deadline 1. As outlined within the **Deadline 2 Cover Letter [REP2-001]**, a twelfth SoCG with Breckland Council was promised for submission at Deadline 3, which the Applicant provided. A number of SoCGs that were submitted at Deadline 1 have also been updated during examination. This is reflected in the updated list of SoCGs below:

- SoCG with Breckland Council [APP/5.11.~~2~~3]
- SoCG with Norfolk County Council [APP/5.12.~~2~~]3]
- SoCG with Environment Agency [APP/5.13.~~3~~2]
- SoCG with Historic England [APP/5.14.1]
- SoCG with Natural England [APP/5.15.~~2~~3]
- SoCG with National Grid Electricity Transmission Plc [APP/5.16.1]
- SoCG with National Highways [APP/5.17.~~1~~2]

- SoCG with Anglian Water Services Limited [APP/5.18.21]
- SoCG with Norfolk Wildlife Trust [APP/5.19.1]
- SoCG with Borough Council of King's Lynn and West Norfolk [APP/5.20.32]
- SoCG with National Energy System Operator Limited (NESO) [APP/5.21.1]; and
- SoCG with Defence Infrastructure Organisation [APP/5.22.1].

3 Current Status of SoCGs

3.1 Summary of Current Position

3.1.1 This section confirms the current status of each SoCG at Deadline 45.

3.1.2 Table 3.1 provides a high-level position on the status of each SoCG and, where necessary, includes further detail to aid the understanding of the status.

3.1.3 Item 1 of Annex F, as contained within the Rule 6 Letter **[PD-006]**, requests that the Applicant summarises *"when it is anticipated that any draft Statements of Common Ground will be finalised and when the finalised signed and dated copies will be submitted to the examination"*. The Applicant considers that a response to this request is difficult to precisely quantify, as the finalisation of each SoCG relies upon reaching full agreement with each corresponding party. However, the Applicant can confirm that good progress is being made with regard to each of the SoCGs and, therefore, the Applicant is confident that all SoCGs will be agreed and finalised before the close of the Examination.

3.1.4 The terms used in **Table 3.1** are as follows:

- Final SoCG – the SoCG has been agreed upon by both parties, with no outstanding matters to resolve.
- Draft SoCG – the SoCG has been discussed between both parties but there are a number of issues still outstanding and are yet to be signed off on.
- Initial SoCG – the SoCG has been drafted by the Applicant (using matters identified from meetings with the party alongside responses to Statutory Consultation and Relevant Representations) and is with the consultee for review. This initial draft has not yet had feedback from the consultee and is therefore not signed off.
- Not yet submitted – the Applicant is progressing these SoCGs with the intent to submit drafts at subsequent deadlines.

Table 3.1 – Current Status of SoCGs

Document Ref.	Relevant Party	Position for this Deadline
APP/5.11.~~2~~ 3	Breckland Council (BC)	A revised draft SoCG has been submitted at Deadline 45. While the Applicant and BC have reached agreement on a number of matters within the SoCG, there are still several matters ~~the main matters~~ still under discussion which relate to ~~cumulative effects,~~ landscape and visual~~, glint and glare, ecology and biodiversity~~ and the Draft DCO.

Document Ref.	Relevant Party	Position for this Deadline
		The Applicant and BC are actively engaging to resolve these matters. ~~BC has also now amended a number of matters within cumulative effects, land use/agriculture, community benefits, landscape and visual and grid connection and uncertainty of development to 'not agreed'. BC has confirmed that they do not consider that there is a benefit in discussing these items further for the remainder of the examination.~~
APP/5.12.~~3~~2	Norfolk County Council (NCC)	A revised draft SoCG has been submitted at Deadline 54 While the Applicant and NCC have reached agreement on a number of matters within the SoCG, there are still several matters still under discussion which relate to ~~This revised version includes the agreement of traffic and transport matters. Otherwise, the outstanding matters remain the same from Deadline 3 and as detailed below.~~ cumulative methodology and the long and short lists, landscape and visual, water, flood risk and drainage and ecology and biodiversity matters. The Applicant is continuing to reach agreement with NCC on these matters. NCC's Natural Environment Team has not been able to provide comments on matters of landscape and visual and ecology and biodiversity. Notwithstanding this, the Applicant and NCC have agreed to submit the SoCG without these comments informing the SoCG with an agreed view that these points will be captured in an SoCG submitted at a future deadline. ~~In line with Annex F of the **Rule 6 Letter [PD-006]**, the Applicant notes the main outstanding concerns held by NCC are in relation to the cumulative methodology and the long and short lists, landscape and visual, glint and glare, water, flood risk and drainage and ecology and biodiversity matters. The Applicant is continuing to reach agreement with NCC on these matters.~~A number of matters within the water, flood risk and drainage sections are confirmed to be 'not agreed'.
APP/5.13.~~2~~3	Environment Agency (EA)	The Applicant has submitted a revised draft SoCG at Deadline 54. While the Applicant and the EA have reached agreement on the majority of matters within the SoCG, there are still a few matters under discussion which relate to BESS, ~~and~~ fire safety and the draft DCO. ~~In line with Annex F of the **Rule 6 Letter [PD-006]**, the Applicant notes the main outstanding concerns relate to BESS / fire safety and the Draft DCO.~~ The

Document Ref.	Relevant Party	Position for this Deadline
		Applicant is continuing to engage with the EA on these matters.
APP/5.14.1	Historic England (HE)	A ~~Draft~~ final and signed SoCG ~~was~~has been submitted at Deadline ~~1~~5. The only matters not agreed within this Final SoCG are with regards to; HER 1-12: Impacts to Designated Heritage Assets, HER 1-13: Impacts to Castle Acre Castle and Castle Acre Priory, and HER 1-14: Impacts to Castle Acre Conservation Area. As set out in the note to HER 1-12 to 1-14 in the SoCG, this disagreement is in a difference of professional judgement on the perceived levels of impact and effect. ~~The ExA's request within Annex H of the **Rule 6 Letter [PD-006]**, to provide information on the likelihood of resolution on each matter, is not yet included within this version, as the parties are still discussing these matters. The Applicant will aim to work with HE to provide this information at a subsequent deadline.~~
APP/5.15.~~2~~3	Natural England (NE)	The Applicant has submitted a revised draft SoCG ~~between Deadlines 3 and 4, further to the revised SoCG provided~~ at Deadline ~~3~~5. ~~In line with Annex F of the **Rule 6 Letter [PD-006]**, the Applicant notes the~~While the Applicant an NE have reached agreement on a number of matters within the SoCG, there are still several ~~main~~ outstanding matters ~~concerns~~ relate~~s~~ing to land use and agriculture matters. The Applicant is continuing to ~~reach agreement~~engage with NE on these matters.
APP/5.16.1	National Grid Electricity Transmission Plc (NGET)	~~An Initial SoCG was~~ The Applicant has submitted a revised draft SoCG at Deadline 5~~1~~. ~~This Initial SoCG was issued to the stakeholder on 5 May 2026. The Applicant has not yet received a response to this Initial SoCG, though the Applicant's lawyers and NGET's lawyers have been engaging on a form of protective provisions.~~ ~~The ExA's request within Annex H of the **Rule 6 Letter [PD-006]**, to provide information on the likelihood of resolution on each matter, is therefore not yet included within this version. The Applicant will aim to work with NGET to provide this information at a subsequent deadline~~All matters within this

Document Ref.	Relevant Party	Position for this Deadline
		SoCG are under discussion and the Applicant and NGET will continue to engage on these matters.
APP/5.17.2~~1~~	National Highways (NH)	The Applicant has submitted a revised draft SoCG ~~between Deadlines 3 and 4, further to the Initial SoCG that was submitted~~ at Deadline ~~1~~5. While the Applicant and NH have reached agreement on a number of matters within the SoCG, there are still several matters still under discussion which relate ~~In line with Annex F of the Rule 6 Letter **[PD-006]**, the Applicant notes the main outstanding concerns relate~~ to ~~wording in~~ the draft DCO and land matters (relating to protective provisions). The Applicant anticipates reaching agreement with NH on these matters and will provide an updated SoCG to reflect this, when possible. A number of matters within the lands and compulsory acquisition, and legal and DCO sections (issues which do not relation to protective provisions) are confirmed to be 'not agreed'. The Applicant has 'split out' this SoCG to reflect matters which do and do not relate to protective provisions, as requested by the ExA.
APP/5.18.2~~1~~	Anglian Water Services Ltd (AW)	A final and signed SoCG has been submitted at Deadline 5, with all matters agreed. ~~revised draft SoCG has been submitted at Deadline 4.~~ ~~The Final and signed SoCG has all matters agreed.~~ ~~The ExA's request within Annex H of the **Rule 6 Letter [PD-006]**, to provide information on the likelihood of resolution on each matter, is included within this version. Planning policy on water resources is noted as a medium likelihood of resolution, whilst firefighting water supply, the CEMP, and BESS firewater management are a low likelihood of resolution..~~ ~~The Applicant and AW are actively engaging to resolve these matters.~~
APP/5.19.1	Norfolk Wildlife Trust (NWT)	A ~~Draft~~ revised draft SoCG was submitted at Deadline ~~1~~5. While the Applicant and NWT have reached agreement on the majority of matters within the SoCG, there are two matters which are 'not agreed' related to Curlew Mitigation and post construction monitoring. The Applicant will submit a final version of this SoCG at Deadline 6.~~The ExA's request~~

Document Ref.	Relevant Party	Position for this Deadline
		~~within Annex H of the **Rule 6 Letter [PD-006]**, to provide information on the likelihood of resolution on each matter, is not yet included within this version, as the parties are still discussing these matters. The Applicant will aim to work with NWT to provide this information at a subsequent deadline.~~
APP/5.20.~~2~~3	Borough Council of King's Lynn and West Norfolk (BCKLWN)	A revised draft SoCG has been submitted at Deadline 45. While the Applicant and BCKLWN have reached agreement on a number of matters within the SoCG, there are still several matters still under discussion which relate ~~In line with Annex F of the **Rule 6 Letter [PD-006]**, the Applicant notes the main outstanding concerns held by BCKLWN relate~~ to ~~skylark mitigation,~~ impacts on RAF Marham, and some details and definitions contained within the draft DCO. The Applicant and BCKLWN are actively engaging to resolve these matters. BCKLWN has also now amended several items within Cultural Heritage / Historic Environment, Landscape and Visual, ~~and~~ Land Use / Agriculture / Soil and the draft DCO to 'not agreed'.
APP/5.21.1	National Energy System Operator Ltd (NESO)	A revised ~~D~~draft SoCG has been~~was~~ submitted at Deadline 5~~1~~. ~~The ExA's request within Annex H of the **Rule 6 Letter [PD-006]**, to provide information on the likelihood of resolution on each matter, is not yet included within this version, as the parties are still discussing these matters. The Applicant will aim to work with NESO to provide this information at a subsequent deadline.~~This revision does not update the position of either of the matters, but includes updates to the record of engagement table. The Applicant continues to engage with NESO and will submit an updated version of this SoCG at Deadline 6.
APP/5.22.1	Defence Infrastructure Organisation	A final and signed SoCG has been submitted at Deadline 5, with all matters agreed.~~A Draft SoCG was submitted at Deadline 1. The Applicant has not yet received a response to this.~~ ~~The Final and signed SoCG has all matters agreed.~~

4 Summary

4.1.1 This section provides a summary of the main topics covered by the SoCGs submitted at Deadline and identifies where there is commonality in topics between the SoCG parties.

4.1.2 **Table 4.1** has been produced to set out the topics covered across the SoCGs and the status of the matter at the submission stage with the relevant party. The colour coding used within this **Table 4.1** is outlined below.

4.1.3 The colours of each cell correspond to the status table in each individual SoCG.

Cell	Status
	Agreed
	Subject to further discussion
	Currently subject to disagreement
	Not Applicable

Table 4.1 – Summary of Commonality with relevant stakeholders

Document Ref.	Party	Topics																												
		Planning Policy	BESS/ Fire Safety	Cumulative Impacts	Location of the Substation	Cultural Heritage / Historic Environment	Aerodrome Height Safeguarding	Land Use / Agriculture	Consultation	Construction	Glint and Glare	Precision Approach Radar	Landscape and Visual	PRoW and Permissive Footpaths	Traffic and Transport	Bird Strike Safeguarding	Water, Flood Risk & Drainage	Waste Management	Decommissioning	Lands and Compulsory Acquisition	Draft DCO	Impact on existing apparatus/infrastructure	Land contamination	Ecology and Biodiversity	Population/Economic Impacts	Grid Connection	Design	Approach to EIA	Community Benefit	Amenity
APP/5.11.32	Breckland Council																													
APP/5.12.32	Norfolk County Council																													
APP/5.13.32	Environment Agency																													
APP/5.14.1	Historic England																													
APP/5.15.32	Natural England																													
APP/5.16.1	National Grid Electricity Transmission Plc																													
APP/5.17.24	National Highways																													
APP/5.18.24	Anglian Water Services Ltd																													

Document Ref.	Party	Topics																												
		Planning Policy	BESS/ Fire Safety	Cumulative Impacts	Location of the Substation	Cultural Heritage / Historic Environment	Aerodrome Height Safeguarding	Land Use / Agriculture	Consultation	Construction	Glint and Glare	Precision Approach Radar	Landscape and Visual	PRoW and Permissive Footpaths	Traffic and Transport	Bird Strike Safeguarding	Water, Flood Risk & Drainage	Waste Management	Decommissioning	Lands and Compulsory Acquisition	Draft DCO	Impact on existing apparatus/infrastructure	Land contamination	Ecology and Biodiversity	Population/Economic Impacts	Grid Connection	Design	Approach to EIA	Community Benefit	Amenity
APP/5.19.1	Norfolk Wildlife Trust																													
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