THE DROVES
SOLAR FARM

The Droves Solar Farm

Statement of Common Ground (SoCG) with Norfolk County Council (Clean)

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1 Introduction

1.1 Overview

1.1.1 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.

1.1.2 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.

1.1.3 This SoCG is being submitted to the Examining Authority (the ExA) at Deadline 6 to reflect the final position between the parties.

1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared by the Applicant and Norfolk County Council ('NCC')**.**

1.2.2 Collectively, the Applicant and NCC are referred to as 'the parties.'

1.3 Purpose of this Document

1.3.1 This SoCG represents the final position between both parties being submitted to the ExA.

1.3.2 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

1.4.1 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

2.1.1 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.

2.1.2 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

3.1.1 The parties have been engaged in consultation since 19 September 2024.

3.1.2 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.

3.1.3 The Applicant and NCC have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has included discussions in relation to landscape and visual, population/economic impacts, glint and glare, ecology and biodiversity, cultural heritage/historic environment, traffic and transport, public rights of way and permissive footpaths, draft DCO, water, flood risk and drainage, waste management, and BESS/fire safety.

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

Table 3.1 – Record of Engagement

Date	Form of Correspondence	Key topics discussed and key outcomes
29/10/2024	Monthly Planning Catch-Up Meeting	• Scoping stage programme • Summary of Co:Design • Progress update on environmental surveys
14/11/2024	Email correspondence from NCC	• Review of survey scope to inform the application • Agreed need for additional follow up surveys in summer 2025
26/11/2024	Monthly Planning Catch-Up Meeting	• Publishing of workshop summary report • Drafting of Statement of Community Consultation • Agricultural Land Classification grading process
07/01/2025	Consultation letter and Email Correspondence from the Applicant	• Consultation on the LVIA methodology, assessment approach, cumulative and viewpoint locations • No response was received from NCC; therefore, the Applicant's assessment progressed on the

		assumption that the proposed approach was acceptable
21/01/2025	Informal SoCC discussion	• NCC keen to engage with the Applicant from an early stage and to get feedback on the SOCC feedback • NCC planning to draft this next year, and will share the full document for the Applicant to comment on
24/02/2025	Workshop	• Discussion on health assessment methodology for EIA • NCC confirmed agreement
03/03/2025	Workshop	• Discussion to inform development of Employment and Skills Strategy
29/04/2025	Monthly Planning Catch-Up Meeting	• Design update and introduction to design principles • Percentage of BMV land use • Introduction to the strategies underpinning the concept masterplan (placemaking, access and biodiversity) • Location and delivery of National Grid Substation
08/05/2025	Briefing	• Pylons and height of solar panels addressed • Lifecycle clarified and panel height options detailed
29/07/2025	Monthly Planning Catch-Up Meeting	• Cumulative impact of solar farm applications within Norfolk County Council • Statutory Consultation summary and debrief • Sharing that a targeted consultation will take place 3 September 2026 until 1 October 2026
19/08/2025	Monthly Planning Catch-Up Meeting	• Presentation to set out the changes included in targeted consultation • The Applicant set out intention to share the Adequacy of Consultation Milestone (AoCM) with PINS and the LPAs • Submission programme update
09/09/2025	Follow Up on LLFA Comments from PEIR	• Climate change allowances – Flood risk and SuDS design • 2D rainfall model / information to be presented

		• SuDS principles and how these are secured • Firewater management
30/09/2025	Monthly Planning Catch-Up Meeting	• Update on progress of target consultation
29/10/2025	Monthly Planning Catch-Up Meeting	• Update on progress of submission
18/05/2026	Meeting with the LLFA	• Flood risk and drainage resolution status
15/06/2026	Meeting with the LLFA	• Flood risk and drainage resolution status
06/07/2026	Meeting with the LLFA	• Flood risk and drainage resolution status
26/08/2026	Meeting with the LLFA	• Flood risk and drainage resolution status
14/09/2026	Letter from the LLFA providing more detailed responses to issues regarding the updated Environmental Statement Chapter 12, The Design Principles, Parameters and Commitments Report and Flood Risk Assessment (FRA) including the Modelling Report Appendix and supporting responses document	• The LLFA provides detailed comments in a table. • The LLFA has reviewed the previous comments against the updated documents to compare whether alterations and additional information have been provided.
October 2026	Emails	• Discussions to finalise SoCG.

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

4 Matters of Discussion

4.1 Overview

4.1.1 The following tables set out, by topic, the matters agreed or not agreed between Applicant and NCC at the point of this document being submitted.

1 – Landscape and Visual

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 1-1	Key Views	NCC raises concerns about the impact of the height of the infrastructure involved in the Scheme, and how this has the potential to have a significant impact on visibility across a sensitive environmental and historic area.	Assessed landscape and visual effects are detailed within **ES Chapter 6: Landscape and Visual [APP/6.2.2]**, which outlines potential landscape and visual impacts upon receptors within the Nar Valley and Castle Acre, as a result of the Scheme. The assessment concludes that there would be no potential long term significant adverse visual effects upon visual receptors within the Site and wider LVIA study area, including those within Castle Acre and the Nar Valley. With regard to landscape character, the assessment concludes that there would be potential long term significant adverse landscape effects upon LCA D1 Swaffham Heath and LCA E6 North Pickenham Plateau. However, these effects upon the LCA's are only judged to be significant where they fall within the Site. There are no potential long term significant adverse landscape effects beyond the Order Limits. A **Technical Information Note – Landscape and Visual [REP3-083]** was submitted at Deadline 3. This document includes additional assessment and baseline information with regard to landscape and visual amenity. The document also includes additional viewpoints and visualisations that have been undertaken at the request of	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			other local councils. An updated version of the **Technical Information Note – Landscape and Visual [APP/8.18.1]** has been submitted at Deadline 5 to reflect updates in respect of PAR Mitigation.	
NCC 1-2	Solar modules	NCC are disappointed that the height of the solar modules is retained at 4.5m, and that a height of 3.5m would have less of a landscape and visual impact.	The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 5: The Scheme [APP/6.1.3]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The Scheme will likely comprise a mixture of fixed and tracker panels, although it is envisaged that the solar element of the project would contain fewer tracker panels. The tracker panels allow for maximising the efficiency of the panels as they track the movement of the sun.	Not Agreed
NCC 1-3	Mitigation	NCC comment that the absence of undergrounding leaves a significant gap in mitigation for landscape and visual impacts.	As set out in **ES Chapter 4: Reasonable Alternatives and Design Evolution [REP3-028]** there are no significant effects arising from the proposed new OHL reported within the ES, and the Site is not within a National Landscape, as such it was not considered necessary to	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			further explore undergrounding as an alternative option.	
NCC 1-4	Landscape character sensitivity and value	NCC are concerned that subsequent judgements on landscape amenity do not appear to fully reflect the increased susceptibility of the characteristics in the study area. Where susceptibility is underplayed, there is a risk that significant landscape effects also become understated. NCC also request the applicant to: • Provide further justification explaining how the identified susceptibility factors have been weighted in reaching the overall landscape sensitivity judgements; • Clarify how perceptual qualities such as tranquillity, enclosure, skyline integrity and recreational function have influenced sensitivity conclusions; and • Confirm that sensitivity judgements are considering baseline online and not including assumptions about mitigation effectiveness.	**ES Chapter 6: Landscape and Visual [APP/6.2.2]** outlines potential landscape and visual impacts because of the Scheme. Paragraph 6.5.18 and Table 6-3 outlines the approach in determining the susceptibility, and therefore sensitivity, of landscape and visual receptors within the study area. The Site falls within numerous Landscape Character Areas (LCA) as outlined within the Breckland Landscape Character Assessment (2007) and confirmed and validated through fieldwork. A review of published assessments and fieldwork to Site and the surrounding study area informed a professional judgement of the identified susceptibility factors and the landscape sensitivity judgements made. The variation in identified susceptibility factors for different LCA's, informed the weighting of the overall landscape sensitivity judgements. Perceptual qualities such as, but not limited to, tranquillity, enclosure, skyline integrity and recreational function have influenced sensitivity conclusions through an assessment of landscape value included	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			within **ES Appendix 6.5: Evaluation of Landscape Value [APP-143]**. The perceptual characteristics of other LCAs within the wider Study Area were also identified through desktop studies of published material and numerous extensive fieldwork visits within summer and winter months. It is confirmed that sensitivity judgements consider baseline conditions only and do not include assumptions regarding mitigation effectiveness. The methodology for assessment is detailed within Section 6.5 of **ES Chapter 6: Landscape and Visual [APP/6.2.2]**. A **Technical Information Note – Landscape and Visual [REP3-083]** was submitted at Deadline 3. This document includes additional assessment and baseline information with regard to landscape and visual amenity. The document also includes additional viewpoints and visualisations that have been undertaken at the request of other local councils. An updated version of the **Technical Information Note – Landscape and Visual [APP/8.18.1]** has been submitted at Deadline 5 to reflect updates in respect of PAR Mitigation.	

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 1-5	Landscape value	NCC note that the Applicant has put an emphasis on the lack of national or local designations, but NCC feel this approach risks underrepresenting values such as experiential and perceptual value, recreational value, and the contribution of historical landscape features. NCC ask the Applicant to: • Clarify how experiential and recreational qualities that have been identified in the baseline have been considered when determining landscape value, particularly where landscapes are not formally designated but contribute to the perceived value and enjoyment of the area; • Consider recognition of higher community value in sensitivity judgements; and • Consider additional mitigation or enhancement measures where effects are identified.	The methodology for assessing landscape value is detailed within Section 6.5 of **ES Chapter 6: Landscape and Visual [APP/6.2.2]**. Definitions of varying levels of landscape value are detailed within Table 6-2. Experiential and recreational qualities identified in the baseline have been considered when determining landscape value and have influenced sensitivity conclusions through an assessment of landscape value included within **Table 3** of **ES Appendix 6.5: Evaluation of Landscape Value [APP-143].** This value assessment considered a number of factors such as Natural Heritage, Cultural Heritage, Landscape Condition, Associations, Distinctiveness, Recreational, Perceptual (scenic), Perceptual (wilderness and tranquillity) and Functional. The value rating for these factors varied between local value, community value and limited value – reflecting the presence and value of respective qualities within the Site and its context. The ratings used for the evaluation of landscape value are set out clearly within the LVIA assessment methodology section 6.5 of **ES Chapter 6: Landscape and Visual [APP/6.2.2]**. In decreasing order, the ratings	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			include national/International (highest landscape value), local/district value, community value and lastly limited value (lowest landscape value). This methodological approach was included within **ES Appendix 2.1: EIA Scoping Opinion Request [APP-133]**. With regard to consideration of 'higher community value', this terminology doesn't align with the assessed methodology. The next highest value rating is 'local', of which the landscape would not be regarded of local value which is defined as having locally designated landscapes (of which there are none). There are a number of different mitigation measures embedded within the Scheme which have been included to limit potentially adverse effects upon the landscape. These mitigation measures are secured by the **Design Principles, Parameters and Commitments [APP/5.8.5]**, the spatial extents shown on the **Works Plan [REP3-004]**, the **outline Operational Environmental Management Plan (oOEMP) [APP/7.8.5]** and the **outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11.3]**. A **Technical Information Note – Landscape and Visual [REP3-083]** was submitted at Deadline 3. This document	

Reference	Topic	Consultee's Position	Applicant's Position	Status
			includes additional assessment and baseline information with regard to landscape and visual amenity. The document also includes additional viewpoints and visualisations that have been undertaken at the request of other local councils. An updated version of the **Technical Information Note – Landscape and Visual [APP/8.18.1]** has been submitted at Deadline 5 to reflect updates in respect of PAR Mitigation.	
NCC 1-6	Recreational Receptors	NCC are concerned that the change in landscape character may be more substantial than reflected in the Applicant's conclusions, as the effect for recreational users is cumulative rather than experienced at individual viewpoints. NCC request clarity on how experiential change along the routes has been assessed, outside of individual viewpoints, and for the Applicant to consider route specific mitigation measures through planting or landscape enhancements to offset experiential change.	The Applicant does not agree that the change in landscape character experienced along the routes may be more [substantial] than is reflected in the conclusions. **ES Chapter 6: Landscape and Visual [APP/6.2.2]** outlines potential landscape and visual impacts as a result of the Scheme. ES Chapter 6 assessed the potential sequential visual effects upon visual receptors within the Site and study area. Para 6.6.71 of **ES Chapter 6: Landscape and Visual [APP/6.2.2]** states *"The different types of groups assessed within this ES chapter encompass local residents; people using key longer distance routes such as roads, cycle ways, recreational routes and navigable waterways; people within accessible or recreational landscapes; people using PRoW; or people visiting key*	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			viewpoints. In assessing areas of settlement, PRoW and local roads, receptors are grouped into areas where effects might be expected to be broadly similar, or areas which share particular factors in common. Longer distance routes and specific viewpoints are not included within these groupings, to allow the sequential experience of travelling along the routes or the key elements that make up a specific view to be considered in a coherent way." Generally, the assessment considers visual effects upon routes as part of their wider respective Visual Receptor Group (VRG). A total number of 7 VRGs have been identified within the Site and Study Area. Para 6.6.84 of ES Chapter 6 states "*Where receptors overlap with one or more VRGs, i.e. PRoW within the Site that extend across both VRG 1 and VRG 2, they are considered within both VRG's. This approach highlights any variations in effect upon a Receptor across the Site which may occur due to proximity to new development and the type of new development proposed at certain points along a route, for example."* For longer distance routes, i.e the Peddars Way and Norfolk Coast Path, routes are assessed as a "standalone" receptor with narrative on potential sequential views.	

Reference	Topic	Consultee's Position	Applicant's Position	Status
			Route specific mitigation is included within mitigation measures embedded within the Scheme which have been included to limit potentially adverse effects upon landscape and visual receptors. These mitigation measures are secured **Design Principles, Parameters and Commitments [APP/5.8.5]**, the spatial extents shown on the **Works Plan [REP3-004]**, the **oOEMP [APP/7.8.5]** and the **oLEMP [APP/7.11.3]**. A **Technical Information Note – Landscape and Visual [REP3-083]** was submitted at Deadline 3. This document includes additional assessment and baseline information with regard to landscape and visual amenity. The document also includes additional viewpoints and visualisations that have been undertaken at the request of other local councils. An updated version of the **Technical Information Note – Landscape and Visual [APP/8.18.1]** has been submitted at Deadline 5 to reflect updates in respect of PAR Mitigation.	
NCC 1-7	Recreational Receptors	NCC also requests further clarification on the advanced planting and phasing of landscape mitigation to ensure the prevention of significant effects.	One of the aims of the advanced planting is to increase visual screening from year 1 of the operational phase. Advanced planting works have taken place in winter 2025/2026. The linear length of advanced planting approximately 3.8km. Details of the	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			advanced planting areas are included within **oLEMP [APP/7.11.3].** Phasing of the remaining landscape mitigation areas would be confirmed during detailed design and post consent. It is envisaged that all proposed planting would be undertaken during the construction phase as soon as practically possible, to maximise growing time before operation and the effectiveness of visual screening.	

Table 2 – Population / Economic Impacts

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 2-1	Compensation	NCC note that compensation packages mentioned in the PEIR stage have not been included in the application. NCC therefore expects Droves Solar Farm Limited to fully engage with those local communities affected by this development; and for the EIA and Environmental Statement (ES) to reflect that engagement. NCC notes that the Deadline 1 submissions, in respect of employment and skills, include no substantive changes and the Council's position as set out in the Local Impact Report remains unchanged: Norfolk County Council welcomes the	The **Planning Statement [AS-076]** confirms that community benefits would be realised at a local level, should consent be granted for the DCO Application. For example, the **oLEMP [APP/7.11.3]** establishes how permissive paths proposed as part of the Scheme will be designed and implemented to improve accessibility across the Site. The **outline Employment, Skills and Supply Chain Strategy (oESSCS) [APP-195]** sets out proposals to promote local apprenticeships and training	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		inclusion of the Outline Employment and Skills Plan and the requirement for a full Employment, Skills and Supply Chain Strategy (ESSCS), approved by Norfolk County Council, prior to commencement. The full Employment and Skills Plan will be produced in consultation with the County Council's Skills and Employment Team.	schemes, with the aim of enhancing local skills and qualification rates. The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining the DCO Application. However, it will be available to fund local projects. The Applicant will continue engagement post-application, to support the development and delivery of community benefits.	
NCC 2-2	Community Benefits	NCC note that a Community Benefit Fund was mentioned in the PIER stage but has not been included in the application. NCC therefore expects Droves Solar Farm Limited to establish such a fund.	The **Planning Statement [AS-076]** confirms that the Applicant has committed to providing a Community Benefit Fund, should consent be granted for the DCO Application. The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining the DCO Application. However, it will be available to fund local projects.	Agreed

Table 3 – Glint and Glare

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 3-1	Consultation	NCC has raised concerns over the need to consider the impacts of glint and glare as recommended by the Ministry of Defence and Civil Aviation Authority.	It has been subsequently confirmed that solar reflections with 'potential for temporary alter-image' are predicted to be geometrically possible towards the ATC Tower at RAF Marham for the Fixed South Facing PV Array configuration; however, consideration of Zones of Theoretical Visibility (ZTV) modelling indicates that views of the Site are unlikely to be possible in practice. Nonetheless, the Applicant and the MOD have agreed a form of wording for a requirement in the **draft DCO [APP/3.1.5]** which requires a Glint and Glare Management Plan to be produced before any solar PV modules are installed, and the Applicant has included this requirement in Schedule 2 of the updated **draft DCO [APP/3.1.5]** at Deadline 5.	Agreed

Table 4 – Ecology and Biodiversity

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 4-1	Buffers	NCC remains concerned that adequate buffer areas round badger setts should be maintained, in line with guidance from the Badger Trust and that any works which has the potential to disturb badgers may require a licence.	Safeguards with regard to Badger are detailed within the **ES Appendix 7.2: Baseline Ecological Survey Report [APP-148]**. Badger within the site are habituated to disturbance within close vicinity to their setts given the current agricultural use, with fields adjacent to these setts being regularly disturbed by ploughing etc.	Not Agreed
NCC 4-2	BNG	NCC advises that the Applicant should be aware of upcoming changes to BNG in relation to NSIPs, as they are concerned about how they will influence the design of the proposed BNG. Further detail as to how BNG will be secured is also needed.	The Applicant notes this comment and can confirm the BNG Assessment and Report have been updated at Deadline 1 where applicable.	Agreed
NCC 4-3	Arboriculture	NCC consider that there are foreseeable negative impacts to trees adjacent to the highway that do not appear to be considered within section 16.4 of the Environmental Statement or the AIA and has identified potential conflict across certain documents. If the impacts are not avoided or insufficiently mitigated then alternative access routes will need to be considered.	The Applicant disagrees with NCC's assertion that there are foreseeable negative impacts to trees adjacent to the highway that have not been assessed within Section 16.4 of the Environmental Statement. **The Arboricultural Impact Assessment (ES Appendix 16.4 [REP2-014])** provides a comprehensive assessment of the likely impacts on existing trees, groups of trees,	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		Update: Constructive meeting held online (9th Oct '26) where applicant demonstrated that the highway requirements (eg visibility splays noted as problems within 6.4 ES Appendix 9.2 Traffic Assessment) had been considered and incorporated into the vegetation management recommendations withing the AIA.	woodlands and hedgerows. This assessment has been informed by, and is consistent with, the tree removal and management approaches set out on the **Vegetation Removal Plan, Appendix 2** of the **oLEMP [APP/7.11.3].**	

Table 5 – Cultural Heritage/Historic Environment

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 5-1	Archaeology	NCC note that an amended version of ES Chapter 8, Appendix 8.7: Outline Archaeological Mitigation Strategy (APP-161) has been agreed which includes the undertaking of further trenching with the amount and location of any additional trenching being proportionate to the overall cumulative impacts, and to be confirmed following completion of the detailed design.	The Applicant agrees that sufficient information has been provided in order to formulate a mitigation strategy for the potential impacts of the Scheme upon the archaeological resource.	Agreed

Table 6 – Traffic and Transport

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 6-1	Construction Traffic	NCC deem that Route C (via South Acre Road) is not appropriate for construction or operational traffic, including both LGVS and HGVs, so that all traffic should instead route via the A1065 to the east.	The Applicant notes the NCC position regarding Route C and vehicle routing as part of the relevant representations – the routing has been amended in both the **outline Construction Traffic Management Plan (oCTMP) [APP/7.7.4]** and **outline Operational Traffic Management Plan (oOTMP) [REP3-079]** to reflect NCC's request, with updated versions of these documents submitted at Deadline 1. The assessments within **ES Chapter 9: Transport and Access [REP1-036]** have also been updated at Deadline 1 to reflect this change and it remains the case that no significant effects are anticipated.	Agreed
NCC 6-2	Cumulative traffic impacts	NCC raised comments regarding the methodology applied in assessing the cumulative transport impact from the Scheme in relation to the nearby High Grove solar farm.	NCC has recorded in paragraph 10.14 of its **Local Impact Report [REP1-094]** and **Response to ExQ1 [REP1-095]** response reference Q15.0.6 that cumulative traffic impacts are unlikely to be significant and requested continued collaboration with all cumulative sites. Section 5.15 of	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			the **oCTMP [APP/7.7.4]** includes a commitment to coordinating with High Grove and any other relevant cumulative schemes. In the event that construction programmes overlap, the **oCTMP [APP/7.7.4]** secures a joint detailed Construction Traffic Management Plan that would be prepared to identify mitigation measures and coordinated working arrangements to minimise impacts.	
NCC 6-3	Access	NCC raised queries on the requirements and purpose for each of the access junctions that are associated with the Scheme, for both construction and operational access, as well as clarifications on the routing of traffic from each access point.	The Applicant updated Table 2-1 of the **oCTMP [REP3-075]** at Deadline 3 to include further clarity on each of the individual access points, including their purpose in the overall access strategy and whether the access is required during construction and operation of the Scheme. Table 2-1 of the **oCTMP [REP3-075]**, submitted at Deadline 3 confirmed, confirms that only Access A, B and C will be utilised for direct access from the A1065, with all other access points	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			serving as internal haul roads only.	

Table 7 – Public Rights of Way and permissive footpaths

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 7-1	PRoW Management	NCC has no comments on the Outline Public Right of Way and Permissive Path Management Plan at this stage. A more detailed discussion regarding the scope and nature of the works will be required.	The Applicant welcomes future discussion on the **outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP-192]** that is secured by way of requirement in the DCO.	Agreed
NCC 7-2	Access	NCC note that all PRoWs and Byways should be kept open or diverted if unable to open, and requested further detail required on what the stopping up would consist off and for how long it would last.	It is anticipated that all PRoWs will be kept open during construction, otherwise a suitable diversion will be provided. However, it is not possible to confirm this until the contractor is appointed and the construction methodology is confirmed. The details for any closures required and management strategy is initially provided in the **oPRoWPPMP [APP-192]**, and the corresponding detailed plan will be secured by way of a	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			requirement in the DCO and provided prior to the commencement of the construction phase.	

Table 8 – Draft DCO

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 8-1	Protective Provisions	NCC would expect any temporary or permanent highway mitigation to be secured through Protective Provisions in the DCO; and by the developer entering into a Section 278 or a Small Highway Works Agreement.	The detailed design of any highway works within the public highway are to be agreed with Norfolk County Council via the process in the **draft DCO [APP/3.1.5]** that effectively mirrors a typical Section 278 or Small Highway Works agreement. The details of these works would be confirmed with Norfolk County Council post-consent, prior to the commencement of the construction phase.	Agreed

Table 9 – Water, Flood Risk & Drainage

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-1	Completeness of FRA and Evidence Base	The LLFA considers that the FRA and associated evidence base are incomplete and inconsistent. Key elements are missing or insufficiently evidenced, including surface water risk assessment across all Works and phases, pre and post development comparisons, consistent modelling outputs and clear demonstration of policy compliance. The LLFA notes reliance on assumptions and future submissions rather than a robust application stage assessment. The LLFA has demonstrated the Solar DCO applications such as the consented West Burton Solar Farm and Great North Road Solar and Biodiversity Park are not relevant to this application and that no information about the methods used in these schemes has been provided as part of this	The Applicant does not agree that **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** is incomplete. The FRA provides a proportionate, risk-based assessment in line with NPS EN-1 and the NPPG, appropriate to the outline nature of the Scheme. Where detail is not yet fixed, the Applicant considers it reasonable for this to be refined post-consent, with conservative assumptions applied at this stage, as secured through **oCEMP [APP/7.6.5], Design Principles, Parameters and Commitments [APP/5.8.5]** and **oLEMP [APP/7.11.3]**. This approach is consistent with other Solar DCO applications such as the consented West Burton Solar Farm and Great North Road Solar & Biodiversity Park. The **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** provides a proportionate assessment appropriate to the parameter-based nature of the Scheme and is supported by site walkovers, infiltration testing, hydraulic modelling, geotechnical investigations and drainage feasibility assessments. Further clarification has been provided at Deadline 5 regarding modelling	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		application and examination. Therefore, there is a lack of evidence of the relevance to referring to these schemes. The LLFA continues to consider the FRA to be incomplete due to a lack of support evidence and gaps within the preliminary design. The LLFA has provided a response to demonstrates this and the further work is required. The LLFA considers that it is not possible to assess all of the risks when there are only limited scheme details provided. Further information will be needed to demonstrate the various assessments have been based on adequate evidence. Various documents including the FRA, oCEMP, oLEMP and chapter 12 of the ES have had some amendments. However, frequently these amendments do not include new or updated technical information or evidence to resolve these gaps.	assumptions, catchment definitions, infiltration testing, exceedance routing, firewater management, construction flood risk and drainage commitments. Further detail to Deadline 5 updates in response to the LLFA's concerns can be found within the response to the LLFA's September comments that have been produced by the Applicant at Deadline 5. The Applicant maintains that sufficient information has been provided to demonstrate that flood risk has been appropriately managed, with detailed design secured through DCO Requirement and its associated management plans. Furthermore, the Applicant is confident in the robustness of the assessment methodologies used within the ES Chapter and FRA, which follow the same approach as the recently consented Great North Road Solar and Biodiversity Park, in which the Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Energy Security and Net Zero states "*the applicant has provided a robust FRA and WFD assessment, as required under section 5.8 of EN-1 and paragraph 2.10.86 of EN-3*."	

Reference	Topic	Consultee's Position	Applicant's Position	Status
		Therefore, no new information has been provided for consideration. Design Principles, Parameters and Commitments [APP/5.8.1] has been updated since the LLFA has provided comments. However, there are notable gaps within the design commitments as identified in the comments and response documents between the LLFA and the applicant. Therefore, no new information has been provided for consideration. The oLEMP [APP/7.11.1] does not provide substantial information in relation to flood risk even through the Design Principles, Parameters and Commitments document indicates that may contain this information. Therefore, there is no new evidence to review relating to the design principles, parameters and commitments in the oLEMP.		

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-2	Lifetime of Development	The LLFA considers that the assessment adopts an inadequately short lifetime, relying on a 60 year operational period that does not reflect the full development lifetime. Further discussion points around the lifetime of the development have been provided in ExA Q3 as requested and notes the NG Substation is proposed to be permanent, while a substantial amount of the key equipment elements (such as solar PV Panels, BESS Units and other pieces electrical equipment are to be replace between 1 and 5 times in the 60 year lifetime. Therefore, as the applicant has proven that it is possible to continue the life of the proposed development, the proposed development could be considered to be a permanent development and should be treated as such.	The Applicant considers a 60-year operational lifetime to be appropriate and proportionate for the Scheme.https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000658-7.10.2 outline Decommissioning Strategy (Clean).pdf The operational lifetime of the Scheme is 60 years, which represents the period during which the infrastructure will be operational and exposed to long-term climate change effects. Construction and decommissioning are temporary phases that occur either side of the operational period and are separately assessed and managed through the **oCEMP [APP/7.6.5]** and **oDS [APP/7.10.2].** As such, the development lifetime has not been excluded from the assessment. Furthermore, the climate change allowances used within the FRA uses the 2070s epoch which extends beyond the anticipated operational phase (suitable for development with a lifespan operating into 2061 - 2125) and therefore encompasses the decommissioning phase. The assessment therefore considers climate change effects over the full duration of	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		No new information provided in relation to the outline Decommissioning Strategy (oDS) [APP/7.10.1].	the Scheme and adopts a precautionary appropriate to future flood risk. The Applicant has also provided a response to the matter relating to the lifetime of the Scheme within the **Applicant's Response to Deadline 5 Submissions [APP/8.34]**.	
NCC 9-3	Climate Change Allowances	The LLFA states that the FRA has not sufficiently justified the selection of a 40% climate change allowance for pluvial flood risk and is not explained to the same level as fluvial allowances. Different climate change allowances appear to be applied to fluvial risk, pluvial risk, and SuDS surface water management, and the LLFA consider this as inconsistent. The climate change allowances should reflect the full lifetime of the development which typically expects at least 75 years for non-residential development.	The Applicant considers the application of a 40% climate change allowance represents a conservative and proportionate approach in accordance with Paragraph 13.1.5 of the Norfolk LLFA Statutory Consultee Guidance (Document Version 7.3, April 2025). The allowance has been applied within the surface water modelling and drainage strategy design and is consistent with the approach adopted for the assessment of the Scheme. **Paragraphs 12.1.20-12.1.22 of ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** has been updated at Deadline 5 to provide additional justification for the climate change allowances adopted. The Applicant does not agree that inconsistent allowances have been applied. Different climate change allowances are applied to different flood mechanisms in accordance with the relevant national guidance and	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		It is unclear whether climate change allowances have been embedded within modelling, temporary works, construction and decommissioning phases.	assessment methodologies. The FRA explains the basis of the allowances adopted for fluvial and pluvial flood risk and how they have been applied within the assessment and drainage strategy. The climate change assessment in regard to the full lifetime of the development is discussed within Reference NCC 9-2 of this document.	
NCC 9-4	Sequential Test and Site Layout	The LLFA considers that the Sequential Test has not been adequately applied, particularly in relation to pluvial flood risk. The LLFA notes inconsistencies within the FRA and ES and whether infrastructure is avoided or mitigated within identified flow paths. The rationale for locating elements within areas of surface water flood risk is not clearly justified nor demonstrated that reasonable alternatives have been exhausted. Therefore, the LLFA are unconvinced that the Sequential Test has been fully	The Applicant maintains that the Scheme has been sequentially designed to avoid areas at highest flood risk where practicable, with all infrastructure located in Flood Zone 1 and outside of identified surface water flow paths, as identified within **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]**. Where minor encroachments occur, these are justified through design mitigation and the operational requirements of the Scheme, secured within **Design Principles, Parameters and Commitments [APP/5.8.5]**. Updates at Deadline 3 clarified that the BESS, Customer Substation and National Grid Substation will be located outside identified pluvial flood pathways following post development modelling, as secured through	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		or correctly applied across all Works and flood risk sources.	Table 3-2, Table 3-3, and Table 3-4 of the **Design Principles, Parameters and Commitments [APP/5.8.5].** Further clarification has been provided within the FRA regarding the distinction between avoidance measures and residual risk mitigation measures at Deadline 4. Further detail to Deadline 5 updates can be found within the Applicant's response to the LLFA's September 2026 comments.	
NCC 9-5	Ordinary Watercourses	The LLFA raises concerns of the lack of clarity and supporting evidence of the presence of ordinary watercourses. Conflicting statements are made about whether ditches connect to the wider hydrological network, and insufficient mapping investigation to clearly evidence disconnection. The LLFA also notes uncertainty around where access tracks cross water features and whether ordinary watercourse consents may be required.	The Applicant's position is that no Ordinary Watercourses are affected by the Scheme. Features identified on site are described as man-made ditches or blind ditches that are not hydraulically connected to the wider watercourse network and therefore do not require an Ordinary Watercourse Consent, as outlined within **ES Chapter 12: Water Resources [APP/6.2.4]**. The Applicant considers this position supported by site walkovers and mapping provided in **ES Figure 12.1: Ephemeral Ditches [APP-115]** and **ES Figure 12.2: Indicative Watercourse Crossing [APP-116]**. 12.6.77 of **ES Chapter 12: Water Resources [APP/6.2.4]** states that there are no natural	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		No new or additional work was undertaken during the examination. There is no new evidence of information provided in the various document updates.	watercourses within the CSA. Site walkovers have been undertaken to confirm that the 'dead-end' shallow agricultural ditches shown in the Ephemeral ditches plan (**ES Figure 12.1: Ephemeral Ditches [APP-115])** and Plate 12-8 and 12-9 are persistently dry following rainfall events, and therefore is not only based on a desk top study. 12.6.78 of **ES Chapter 12: Water Resources [APP/6.2.4]** states another site walkover has been undertaken 8/9/2026 to confirm the ditches have blind ends as no buried culverts were observed using a 3m metal avalanche probe, as shown within the second image of Plate 12-9. There is no mention within **ES Chapter 12: Water Resources [APP/6.2.4] or ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** of these ephemeral ditches being hydrologically connected to any ordinary watercourse. The Master mapping shows that there are no ordinary watercourses within the Order limits, therefore Ordinary watercourse consents are not required.	

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-6	Surface Water Flood Risk	The LLFA considers that surface water flood risk has not been comprehensively or consistently assessed. Key concerns include missing evidence base, such as runoff rate assessment, inconsistent or limited commitment to management of surface water runoff or unclear assessment of pre and post development conditions, limited consideration of surface water in earlier ES chapters and incomplete coverage of all Works and phases. The LLFA identify gaps in how flow paths, exceedance routing and interaction with site layout are addressed.	The Applicant states that all sources of flood risk, including surface water flood risk, have been assessed within **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]**. The Scheme will be designed to ensure no increase to surface water flood risk on or off site, with runoff managed through greenfield runoff principles, infiltration where feasible, and the future provision of SuDS secured through the **oCEMP [APP/7.6.5]** and **oOEMP [APP/7.8.5]**. The Applicant considers the assessment proportionate given the current design stage, with further detail secured through DCO requirements. The Applicant maintains that surface water flood risk has been comprehensively assessed through site-specific pluvial modelling, drainage feasibility assessments and flood risk appraisal. Updates at Deadline 5 provide additional clarification regarding catchment definitions, exceedance routing, access track drainage, interaction with pluvial flow routes and the role of the post-development drainage system in managing pluvial runoff. The Applicant maintains that the Scheme will not increase flood risk on site or elsewhere.	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-7	Hydraulic Modelling	The LLFA expresses low confidence in the hydraulic modelling to support the FRA. The LLFA does not consider the model suitable to validate flood extents, depths or mitigation effectiveness due to a surface water hydraulic model being prepared for an ordinary watercourse but without including site specific watercourse channel information such as the channel or the culvert There are also some other technical concerns around the model build and application of the hydrology discussed in more detail in the technical responses between the LLFA and the applicant.	The Applicant considers the hydraulic modelling approach to be appropriate and proportionate given the scale and nature of the Scheme and the available data for a pluvial flood risk assessment. The model is intended to provide a risk-based assessment, rather than a fully calibrated predictive model. The model was developed to assess overland flow pathways and ponding behaviour and was not intended to represent a detailed fluvial model of the catchment. Updates at Deadline 5 within **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** clarify the model objectives, catchment definitions, critical storm duration selection, use of EA mapping for reasonableness checking, model limitations and the distinction between the pluvial assessment and a fluvial modelling exercise. Additional sensitivity testing undertaken with the culvert represented in the model demonstrated no material change to the predicted flood extents or depths. Post development scenario modelling has already been committed to as shown within Table 3-2, 3-3, and 3-4 of the **Design Principles, Parameters and Commitments**	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			[APP/5.8.5] which will help inform location of Works Nos. 2-4 infrastructure at detailed design. Work Nos. 2-4 will have a drainage system designed to 1% AEP plus 40% climate change to manage flood risk from this area of the development. The Applicant has produced a surface water model that is concerned with overland flow generated by rainfall across the contributing catchment and is not intended to represent a detailed fluvial hydraulic model. The Applicant maintains that the risk of surface water flooding is appropriately assessed and mitigated.	
NCC 9-8	Construction Phase Flood Risk	The LLFA considers that construction phase flood risk has not been sufficiently assessed or mitigated. Temporary works present flood risk, yet surface water management plans are deferred to future plans or insufficiently detailed. The timing of drainage installation relative to construction activities is unclear,	The Applicant accepts that construction presents temporary flood risk, but considers this adequately managed through mitigation commitments secured in the **oCEMP [APP/7.6.5]**. Temporary drainage, SuDS, sediment control, and water management measures will be implemented prior to and during construction. Further detail of the Applicant's responses to the LLFA's outstanding concerns can be	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		and climate change allowances are not transparently embedded for temporary phases.	found within the **Applicant's Response to Deadline 4 Submissions [APP/8.28]**, where the LLFA's comments are specifically addressed.	
NCC 9-9	Access Tracks and Crossings	The LLFA raises concerns regarding the flood risk implications of access tracks and crossings, particularly where tracks are described as semi-permeable or potentially permanent. The LLFA does not accept that compacted aggregate tracks can be considered permeable. The applicant has now acknowledged the tracks are impermeable and included a commitment to provide surface water drainage ditches along the access road (temporary and permanent). There continues to be uncertainty of where and whether access tracks will cross watercourses, whether an appropriate drainage discharge location has been demonstrated	The Applicant's position is that access tracks are designed with drainage in mind, using reduced permeability materials and trackside drainage ditches, swales and cross-drainage to manage runoff, as secured through the **oCEMP [APP/7.6.5]** and **oOEMP [APP/7.8.5]**. Any crossings are over man-made ditches rather than Ordinary Watercourses. Final design, including culverts and drainage, will be confirmed at detailed design stage and secured by requirement. The Applicant maintains that access tracks will be served by drainage infrastructure designed to accommodate the 1% AEP event plus 40% climate change allowance. Updates at Deadline 5 include Paragraph 12.3.31 of ES **Appendix 12.2: Flood Risk Assessment** to clarify that runoff from access track drainage systems will discharge to adjacent permeable and vegetated areas to infiltrate, as requested by the LLFA.	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		as viable and how long term design life is being considered.		
NCC 9-10	Mapping, Figures and Referencing	The LLFA identifies issues with mapping quality, figure clarity and document referencing, undermining confidence in the evidence. The applicant has made some amendments however, the applicant has not provided updated plans that show all aspects of the mitigation measures that would influence the proposed design such as the PAR mitigation. In addition, there is no change in flood risk plan provided as supporting evidence to the applicant's statements to demonstrate the amount of change in flood risk. The LLFA considers that these presentation issues affect the interpretation of flood risk and mitigation proposals.	At Deadline 5, the Applicant does not acknowledge any figures or tables that require clarification or correction and that all updates have been made at previous deadlines. The Applicant considers these to be presentation issues rather than substantive assessment flaw and does not accept that they undermine the conclusions of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** or **ES Chapter 12: Water Resources [APP/6.2.4**.	Not Agreed
NCC 9-11	SuDS and Drainage Strategy	The LLFA considers the incomplete evidence and information demonstrating a viable discharge location across the proposed site for the	The Applicant does not agree that there is no clear site-wide drainage strategy. The **ES** Appendix **12.2: Flood Risk Assessment [APP/6.4.5]** demonstrates an infiltration-led drainage strategy supported by SuDS	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		sustainable drainage strategy. Commitments to SuDS are inconsistent between the ES and FRA and are limited to certain Works or indicate that the development of design information and parameter is deferred to post-consent design stages without sufficient evidence of space, feasibility or coverage.	measures where appropriate. Drainage commitments are also located within the **DPPC [APP/5.8.5]**. The Applicant does not agree that there is inconsistency between commitments to SuDS in the ES and FRA. Both **ES Chapter 12: Water Resources [APP/6.2.4]** and **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** confirm a commitment to SuDS across relevant Works, designed to the 1 % AEP plus climate change allowance, with drainage principles set out in both documents. Given the outline nature of the Scheme at DCO stage, the Applicant considers it appropriate that detailed SuDS design is secured through requirements within the **oCEMP [APP/7.6.5]** and **oOEMP [APP/7.8.5]** rather than fixed at application stage. Updates at Deadline 5 provided additional clarification regarding drainage catchments, infiltration assumptions, maintenance access and drainage commitments across the application documents**.** Further detail of the Applicant's responses to the LLFA's outstanding concerns can be found within the **Applicant's Response to**	

Reference	Topic	Consultee's Position	Applicant's Position	Status
			Deadline 4 Submissions [APP/8.28], where the LLFA's comments are specifically addressed.	
NCC 9-12	Impermeable Areas and Infrastructure	The LLFA notes that the FRA and ES do not consistently or transparently address the extent and implications of impermeable areas. There are uncertainties about finished ground levels, the proposed development platform levels, consolidation platforms and the long term retention of infrastructure. There is limited information regarding the surface water drainage of the veracious construction compounds and the proposed discharge location for these areas. The LLFA notes most Work Nos have either drainage or impermeable areas indicated in the Works No. item list. However not all the Works No.s have commitments for the	**ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** states that impermeable areas have been assessed conservatively often assuming worst case impermeability for outline drainage calculations. Runoff from infrastructure such as substation, BESS, access tracks and conversion units will be managed through infiltration, filter drains, swales and attenuation as required, as secured through **oCEMP [APP/7.6.5]** and **oOEMP [APP/7.8.5]**. A drainage system for these Work Nos. will be designed to 1% AEP plus 40% climate change, as stated within the **DPPC [APP/5.8.5].** Final layouts and finished floor levels and drainage measures will be confirmed at detailed design, with compliance secured through the DCO.	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		design parameters that are associated to drainage.		
NCC 9-13	Infiltration and Ground Conditions	The LLFA considers that infiltration evidence is insufficient and the applicant has not undertaken any additional infiltration tests to provide evidence to support this scheme. The FRA assessment of ground conditions is limited a combination of observations of surface level of soil, a few localised (and in some places incomplete) infiltration tests and a national scale desk top analysis of land and soil type. The site specific information (infiltration testing) obtained is very localised to just a small area of the proposed development site (parts of Works Nos. 2 to 4) due to the investigating the potential for infiltration for the drainage strategy. However, other areas of development way from this location are proposing to	The Applicant maintains that infiltration is viable and appropriate, supported by site-specific testing. Infiltration testing was not extended to the wide site areas as infiltration will continue to occur as per baseline conditions. The Scheme does not increase surface water runoff in these areas, as outlined in section 12.3.16 of the **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]**. Updates at Deadline 5 clarify that infiltration testing was intentionally targeted at Work Nos. 2 – 4 and was undertaken to establish outline viability rather than provide detailed drainage design parameters. The wider evidence base, including geological mapping, Soilscape information, intrusive investigations and infiltration testing, indicates that the Site is generally characterised by freely draining sandy and chalk-derived soils. Further site-specific investigations will be undertaken where infiltration drainage features are proposed as part of detailed design.	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		infiltrate to ground without any relevant supporting scientific site specific evidence to determine whether discharge is viable. Of the infiltration tests undertaken, some were not completed due to running out of time to complete the tests on site. There is notable variability between some of the infiltration test locations in close proximity. The uncompleted infiltration tests due to lack of time combined with the variability in the results over short distances indicates there may be limitations to the infiltration potential contrary to the desk top study. Assumptions on ground conditions and infiltration are viewed as unsupported. A more comprehensive infiltration testing strategy is required.	Further detail of the Applicant's responses to the LLFA's outstanding concerns can be found within the **Applicant's Response to Deadline 4 Submissions [APP/8.28]**, where the LLFA's comments are specifically addressed.	

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-14	Ground Levels and Decommissioning	The LLFA have concerns that ground levels, earthworks and decommissioning outcomes are unclear and inconsistently described. It is not clear whether ground reinstatement relates to pre-development or finished ground levels, nor whether imported materials used to create platforms will be fully removed. The applicant has introduced the PAR Mitigation during the examination process and as yet it is unconfirmed whether the design will use fences or large earth bunds for the mitigation, each of which would have notable impacts on surface water flows and drainage. The LLFA considered that retained materials or altered levels could permanently affect surface water flow paths and flood risk beyond the operational phase.	Ground levels and decommissioning have been adequately addressed at a proportionate level. The majority of below-ground infrastructure will be removed or cut down to 1.2 m below ground, allowing the land to be reinstated for agricultural use and restoring baseline drainage conditions as far as practicable, as outlined within the **oDS [APP/7.10.2]**. The **oDS [APP/7.10.2]** states in Paragraph 2.1.6 the excavations would be backfilled and that land would be contoured to a profile approximately similar to the existing topography in agreement with the landowner. The Applicant does not anticipate permanent changes to site-wide surface water drainage patterns following decommissioning. Detailed decommissioning methodologies, including any earthworks, soil profiling and land reinstatement measures, would be developed and agreed through the detailed Decommissioning Strategy secured by Requirement 20 of the draft DCO. The **Design Principles, Parameters and Commitments [APP/5.8.6]** was updated at Deadline 5 to include provision for the	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			management of surface water from PAR mitigation, should bunds be used. The Applicant therefore considers that sufficient information has been provided at this stage, proportionate to the outline nature of the decommissioning proposals and the fact that decommissioning would not occur until the end of the Scheme's operational life.	
NCC 9-15	Battery and Fire Water Management	The LLFA considers that battery safety and firewater management have not been sufficiently assessed of integrated with flood risk considerations in part due to a lack of development design information at this time. Specifically, there is inadequate evidence showing how firefighting water and contaminated runoff from BESS and substations would be managed, contained and prevented from increasing flood risk or polluting watercourses. The LLFA also notes limited consideration of the interaction between the Battery Safety	Battery safety and fire water risks are appropriately addressed through the **outline Battery Safety Management Plan (oBSMP) [APP/7.14.2]** and **oCEMP [APP/7.6.5]**. Fire prevention, suppression, and containment measures will be implemented to ensure fire water runoff is managed and controlled. The Applicant disagrees with the LLFA on the limited interaction between the Battery Safety Management Plan and Flood Risk Assessment, noting consistency in measures and procedures across both documents as well as with the measures secured in the management plans. Both documents outline that fire suppressant would be entirely contained in dedicated tank structures and that a penstock would prevent interaction with infiltration structures.	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		Management Plan and the Flood Risk Assessment, reducing confidence that emergency scenarios have been fully and consistently addressed. The LLFA also notes the water in some of the fire suppressant system will need to be deionised. Norfolk is a water stressed area where a large number of abstraction licences for agricultural purposes are being removed. The new National Standards for SuDS supports the Norfolk LLFA Developer Guidance that requires runoff from a development to consider rainwater capture and reuse as priority 1 before the discharge of surface water to ground. This has not yet been full considered as the applicant can demonstrate a need and potential reuse for surface water on site it is appropriate for the applicant to assess and priories this source of water along with	The Applicant disagrees that battery safety and firewater management have not been sufficiently assessed. The **oBSMP [APP/7.6.4]** confirms that in the unlikely event of a BESS fire, all firefighting water will be contained within a purpose-built containment system incorporating a penstock arrangement designed to prevent the release of contaminated firewater to the surrounding environment, The document acknowledges that the application of large volumes of water to lithium-ion battery fires can create contaminated runoff and identifies the importance of runoff containment to protect aquatic environments. The preferred fire suppression approach relies on integrated battery safety systems, including battery management systems, off-gas detection and bespoke fire detection and suppression systems, reducing reliance on external firefighting water where practicable. Paragraph 5.6.1 of the **oBSMP [APP/7.6.2]** commits to the incorporation of an onsite fire containment strategy within the detailed drainage design, with full details to be included within the detailed Battery Safety	

Reference	Topic	Consultee's Position	Applicant's Position	Status
		the provision of the appropriate equipment necessary to facilitate the water's use.	Management Plan (BSMP) and Emergency Response Plan (ERP) prepared prior to construction. The detailed BSMP and ERP will therefore provide site-specific arrangements for the collection, containment, management and disposal of any contaminated firewater, ensuring that such runoff cannot enter surrounding drainage systems, watercourses or flood storage areas. **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** confirms that runoff at Works No.2-4 will drain to dedicated containment infrastructure designed to provide both surface water attenuation and firewater storage. In the unlikely event of a battery fire, an automatic penstock with a manual backup) would isolate the drainage system, preventing contaminated firewater from reaching infiltration features. Any firewater will be removed from site by tanker and disposed of appropriately. The containment system has been designed to accommodate both the 1% AEP event with 40% climate change allowance and the expected fire suppressant volume, ensuring emergency response scenarios do not increase flood risk. Additional measures	

Reference	Topic	Consultee's Position	Applicant's Position	Status
			including impermeable lining beneath drainage infrastructure and perimeter containment measures around the BESS, will prevent contaminated runoff infiltrating to the aquifer. Therefore, the oBSMP and FRA have been developed in a coordinated manner, demonstrating that firefighting water and contaminated runoff can be safely contained, managed and removed within increasing flood risk or causing pollution to groundwater or surface waters. The LLFA is incorrect in stating that '*LLFA also notes the water in some of the fire suppressant system will need to be deionised*'. The **Design Principles, Parameters and Commitments [APP/5.8.5]** was updated at Deadline 5 to include the potential for rainwater harvesting and the use of deionising plant to supply water for PV array cleaning if feasible. As such, the Applicant considers the Scheme accords with the hierarchy of water disposal in the new National Standards for SuDS.	

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 9-16	Ecology Mitigation Areas	The LLFA raises concerns that ecology mitigation areas are being relied upon to deliver flood risk benefits without sufficient evidence. In particular, areas proposed for skylark and curlew mitigation are currently subject to arable cropping and pig farming, which can increase compaction and surface water runoff. The LLFA notes uncertainty over future land management, grazing intensity, crop rotation, and whether pig farming will be removed. The FRA assessment of ground conditions is limited a combination of observations of surface level of soil, a few localised (and in some places incomplete) infiltration tests in parts of Works Nos. 2 to 4 and a national scale desk top analysis of land and soil type. It is not clear what site specific evidence that applicant has for the environmental mitigation areas infiltration potential to support their drainage strategy to	The Applicant considers that ecology mitigation areas are appropriately designed and will be managed to deliver ecological benefits without increasing flood risk. The Applicant does not agree that the ecology mitigation areas are relied upon as primary flood mitigation measures. As clarified within **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.5]** in Deadline 5, these areas are proposed for biodiversity and habitat enhancement and not necessary to demonstrate compliance with flood risk policy. The mitigation and enhancement areas will remain predominantly permeable and undeveloped and are therefore not expected to increase runoff or flood risk relative to the existing baseline. The Scheme's flood risk strategy relies on the drainage strategy, SuDS measures and infiltration led runoff management rather than ecological mitigation land. As outlined in ISH3, areas in Work No. 1 will be vegetated, therefore controlling runoff from the Scheme in accordance with recognised standard industry practice.	Not Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
		determine whether discharge is viable. Without clarification, site specific evidence and secured commitments, the LLFA considers the claimed surface water and flood risk benefits from ecological mitigation areas may be overstated or not realised in practice.	Further detail of the Applicant's responses to the LLFA's outstanding concerns can be found within the **Applicant's Response to Deadline 4 Submissions [APP/8.28]**, where the LLFA's comments are specifically addressed.	
NCC 9-17	Grassland, Grazing and Agriculture	The LLFA considers that reliance on grassland establishment and grazing to manage surface water runoff is uncertain. It notes that grassland typically requires 12 – 18 months to establish, during which flood risk benefits may not be realised. Concerns are raised that grazing could lead to soil compaction, bare ground and increased runoff. The LLFA also highlights that existing pig farming may limit the claimed	The Applicant does not rely upon fully established grassland as the sole or primary means of managing flood risk. Vegetation establishment will commence at the earliest practicable opportunity and may include cover crops, early seeding and phased establishment, as outline within the **oLEMP [APP/7.11.3]**. Flood risk management is achieved through a combination of permeable land use, infiltration, soil management, drainage infrastructure and long-term vegetation management.	Not Agreed.

Reference	Topic	Consultee's Position	Applicant's Position	Status
		flood risk benefits unless clearly removed or managed. During the examination, the applicant has introduced the PAR Mitigation and as yet it is unconfirmed whether the proposed mitigation design will use fences or large earth bunds for the mitigation, each of which would have notable impacts on surface water flows and drainage. The inclusion of bunds would mean that a positive drainage system would be required within these areas of the Solar PV Arrays. While the impact of tall fences is undefined as the type of fencing is unclear, however it is likely to have an impact on the surface water flow paths and drainage.	The Applicant does not rely on grassland as primary flood mitigation but considers it contributes to maintaining baseline conditions. The **Design Principles, Parameters and Commitments [APP/5.8.6]** was updated at Deadline 5 to include provision for the management of surface water from PAR mitigation, should bunds be used.	

Table 10 – Waste Management

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 10-1	Minerals	NCC highlights it does not consider that the proposed development will result in needless sterilisation of safeguarded mineral resources. This is due to the temporary nature of the project, the founding methods to be used for the project, and the limited areas of safeguarded mineral resources within the project boundary.	The Applicant is pleased to have reach agreement with NCC on the impact of the Scheme on safeguarded mineral resources.	Agreed
NCC 10-2	Re-use of materials	NCC notes that a Site Waste Management Plan (SWMP) will be developed as part of an Operational Environmental Plan to address waste prevention, reuse, recycling and recovery during the Operational Phase. It will be submitted under a requirement of DCO. NCC agrees that the measures are appropriate at this stage and will provide any further comments on the details contained within the draft DCO and the requirements of the DCO at a future date.	The Applicant is pleased to have reached agreement with NCC regarding the effects of the Scheme on waste management capacity in the vicinity of the Site, the measures to control waste within the **oCEMP [APP/7.6.5]**, and the commitment to prepare a Site Waste Management Plan (SWMP). The Applicant also welcomes NCC's comments on the draft DCO, when available.	Agreed

Table 11 – BESS / Fire Safety

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 11-1	Infrastructure	The LLFA notes that there is no information for either of the substations or the wider BESS site platforms (although an individual battery storage unit is included). There is also no information relating to the proposed design of the 10 new pylons and additional grid connection infrastructure.	Typical BESS system layout and an indicative substation layout has been provided within **ES Chapter 5: The Scheme [APP/6.1.3]** at Plate 9 and Plate 11, respectively. Visualisations of the Scheme, both parameter based and the illustrative design, from a number of assessed viewpoints within the wider study area are included within **ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [AS-023] [AS-025] [AS-027] [AS-029], ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [AS-031] [AS-033] [AS-035] [AS-037], ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [REP3-058] [REP3-059] REP3-060]** and **ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [AS-045] [AS-047] [AS-049]**.	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
NCC 11-2	Infrastructure	There is also no information relating to the proposed design of the 10 new pylons and additional grid connection infrastructure.	The assessment of the Scheme has been based on the Rochdale Envelope and the maximum and minimum parameters within it; should consent be granted, the detailed design of the Scheme would be undertaken in accordance with the **Design Principles, Parameters and Commitments [APP/5.8.5]**. Indicative information has been provided as part of the DCO Application to aid in understanding and visualising these parameters but does not form part of the design being sought for approval.	Agreed
NCC 11-3	Infrastructure	A route plan is provided in Appendix 5.1 Plate 7, although due to the lack of symbology or legend on the plan combined with limited labelling, it is not possible to determine what is being shown / depicted or where this extract is in relation to the proposed development. Further information is required.	**ES Appendix 5.1: Illustrative Technical Information [REP2-020]** has been updated at Deadline 1 to replace Plate 7 with an updated Illustrative Grid Connection Routing drawing, capturing tweaks to the illustrative layout, that also includes a key to aid in interpreting the drawing. Updates to this Appendix have also been made to provide indicative	Agreed

Reference	Topic	Consultee's Position	Applicant's Position	Status
			pylon and pylon foundation design information.	

5 Signatories

5.1 Overview

5.1.1 The above SoCG is agreed between The Droves Solar Farm Limited (the Applicant) and Norfolk County Council, as specified below.

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

Name:	[redacted]
Job Title:	
Date:	
Signature:	[redacted]

5.1.3 Duly authorised for and on behalf of **Norfolk County Council**.

Name:	[redacted]
Job Title:	NSIP Team Leader
Date:	29/10/2026
Signature:	[redacted]

THE DROVES

SOLAR FARM

5.12.4 Statement of Common Ground with Norfolk County Council (Clean)

Final Audit Report 2026-10-29

Created:	2026-10-29
By:	[redacted]
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