THE DROVES
SOLAR FARM

The Droves Solar Farm

Statement of Commonality (Tracked)

Prepared by: DWD
Date: October 2026
PINS reference: EN0110013
Document reference: APP/5.10.5 (Revision 5)
APFP Regulation Reg 5(2)(q)
Infrastructure Planning (Examination Procedure) Rules 2010



Contents

1 Introduction 1
1.1 Overview 1
1.2 Structure of the Statement of Commonality 1
2 Position 2
2.1 Structure of the SoCGs 2
2.2 List of SoCGs 2
3 Current Status of SoCGs 4
3.1 Summary of Current Position 4
4 Summary 9

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 ~~5~~ 6 to reflect the final~~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.~~7~~8]** 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~~The final list of SoCGs is reflected ~~in the updated list of SoCGs~~ below:

- SoCG with Breckland Council [APP/5.11.~~3~~4]
- SoCG with Norfolk County Council [APP/5.12.~~3~~4]
- SoCG with Environment Agency [APP/5.~~1332~~13.4]
- SoCG with Historic England **[REP5-018]**~~[APP/5.14.1]~~
- SoCG with Natural England [APP/5.15.~~3~~4]
- SoCG with National Grid Electricity Transmission Plc [APP/5.16.~~1~~2]
- SoCG with National Highways [APP/5.17.~~2~~3]

- SoCG with Anglian Water Services Limited **[REP5-026]**~~[APP/5.18.2]~~
- SoCG with Norfolk Wildlife Trust [APP/5.19.~~1~~2]
- SoCG with Borough Council of King's Lynn and West Norfolk [APP/5.20.~~3~~4]
- SoCG with National Energy System Operator Limited (NESO) [APP/5.21.2~~1~~]; and
- SoCG with Defence Infrastructure Organisation ~~[~~**[REP5-034]**~~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 ~~5~~6.

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~~3.1.3 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.~~3~~ 4	Breckland Council (BC)	A ~~revised draft~~final SoCG has been submitted at Deadline ~~5~~6. The 'not agreed' matters within this final SoCG are with regards to: Cumulative Impact, Land Use / Agriculture, Community Benefit, Landscape and Visual, draft DCO and Grid Connection and Uncertainty of Development. ~~While the Applicant and BC have reached agreement on a~~

Document Ref.	Relevant Party	Position for this Deadline
		~~number of matters within the SoCG, there are still several matters still under discussion which relate to landscape and visual and the Draft DCO.~~ ~~The Applicant and BC are actively engaging to resolve these matters.~~This final SoCG has not been signed as BC did not have any available persons to sign this into Deadline 6. BC has indicated that it is possible to sign this final SoCG following Deadline 6 and ahead of the close of Examination on 6 November 2026. The Applicant will work with BC to submit a signed SoCG ahead of the close of examination, acknowledging that acceptance of this is at the ExA's discretion.
APP/5.12.~~3~~4	Norfolk County Council (NCC)	A ~~revised draft~~final and signed SoCG has been submitted at Deadline ~~5~~ 6. ~~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 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.~~ ~~A number of matters~~ The 'not agreed' matters within this final SoCG are with regards to:~~within the~~ Landscape and Visual, Ecology and Biodiversity, and water, flood risk and drainage ~~sections are confirmed to be 'not agreed'~~.
APP/5.13.~~3~~4	Environment Agency (EA)	A final and signed SoCG has been submitted at Deadline 6. ~~The Applicant has submitted a revised draft SoCG at Deadline 5.~~ The only matters 'not agreed' within this final SoCG are with regards to the draft DCO. There are also some matters which have been left as 'under discussion', related to rainwater harvesting (EA52) and permitted preliminary works (EA48). The Applicant

Document Ref.	Relevant Party	Position for this Deadline
		considers that it has addressed the EA's concerns on these matters within updates to DCO Application documents submitted at Deadline 6; however, the EA is unable to confirm agreement until it has reviewed the submitted documents, despite the Applicant offering to share the updated versions prior to submitting them. As such, these matters remain 'under discussion' in the final version of the SoCG. ~~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, fire safety and the draft DCO. The Applicant is continuing to engage with the EA on these matters.~~
REP5-018~~APP/5.14.1~~	Historic England (HE)	A final and signed SoCG has been submitted at Deadline 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.
APP/5.15.~~3~~4	Natural England (NE)	A final and signed SoCG has been submitted at Deadline 6. ~~The Applicant has submitted a revised draft SoCG at Deadline 5.~~ The only matters which remain 'not agreed' are related to land use and agriculture, specifically 1-1(2) temporary impacts, 1-1(4) magnitude criteria, and 1-3 siting of permanent infrastructure. ~~While the Applicant an NE have reached agreement on a number of matters within the SoCG, there are still several outstanding matters relating to land use and agriculture matters. The Applicant is continuing to engage with NE on these matters.~~
APP/5.16.~~1~~2	National Grid Electricity Transmission Plc (NGET)	A final and signed SoCG has been submitted at Deadline 6. ~~The Applicant has submitted a revised draft SoCG at Deadline 5.~~

Document Ref.	Relevant Party	Position for this Deadline
		All matters within this SoCG remain 'under discussion' and the Applicant and NGET will continue to engage on these matters after the close of the Examination.
APP/5.17.~~2~~3	National Highways (NH)	A final and signed SoCG has been submitted at Deadline 6. ~~The Applicant has submitted a revised draft SoCG at Deadline 5.~~ The only matters which remain 'not agreed' are related to Lands and Compulsory Acquisition: Issues not relating to Protective Provisions, and Legal and DCO: Issues not relating to Protective Provisions. ~~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 to 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.~~
REP5-026~~APP/5.18.2~~	Anglian Water Services Ltd (AW)	A final and signed SoCG has been submitted at Deadline 5, with all matters 'agreed'.
APP/5.19.~~1~~2	Norfolk Wildlife Trust (NWT)	A final and signed SoCG has been submitted at Deadline 6. ~~A revised draft SoCG was submitted at Deadline 5.~~ ~~While the Applicant and NWT have reached agreement on the majority of matters within the SoCG, there are two~~The only matters ~~matters~~ which ~~are~~remain 'not agreed' are related to Curlew Mitigation and post construction monitoring. ~~The Applicant will submit a final version of this SoCG at Deadline 6.~~
APP/5.20.~~3~~4	Borough Council of King's Lynn	A final and signed SoCG has been submitted at Deadline 6.

Document Ref.	Relevant Party	Position for this Deadline
	and West Norfolk (BCKLWN)	~~A revised draft SoCG has been submitted at Deadline 5.~~ The 'not agreed' matters within this final SoCG are with regards to ~~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 to 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, Land Use / Agriculture / Soil and the draft DCO ~~to 'not agreed'~~.
APP/5.21.~~1~~2	National Energy System Operator Ltd (NESO)	A final and signed SoCG has been submitted at Deadline 6. ~~A revised draft SoCG has been submitted at Deadline 5.~~ ~~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.~~This version does not have any matters 'not agreed'; however, the grid connection agreement matter at GC-02 remains 'under discussion' until the Scheme receives its 'Gate 2 status' and a subsequent Gate 2 offer is signed.
REP5-034~~APP/5.22.1~~	Defence Infrastructure Organisation	A final and signed SoCG has been submitted at Deadline 5, with all matters 'agreed'

4 Summary

4.1.1 This section provides a summary of the main topics covered by the SoCGs submitted at Deadline 6 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/ Protective Provisions	Land contamination	Ecology and Biodiversity	Population/Economic Impacts	Grid Connection	Design	Approach to EIA	Community Benefit	Amenity
APP/5.11.~~34~~	Breckland Council																													
APP/5.12.~~34~~	Norfolk County Council																													
APP/5.13.~~34~~	Environment Agency																													
[REP5-018]~~APP/5.14.1~~	Historic England																													
APP/5.15.~~34~~	Natural England																													
APP/5.16.~~12~~	National Grid Electricity Transmission Plc																													
APP/5.17.~~23~~	National Highways																													
[REP5-026]~~APP/5.18.2~~	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/ Protective Provisions	Land contamination	Ecology and Biodiversity	Population/Economic Impacts	Grid Connection	Design	Approach to EIA	Community Benefit	Amenity
APP/5.19.~~2~~1	Norfolk Wildlife Trust																													
APP/5.20.~~3~~4	Borough Council of King's Lynn and West Norfolk																													
APP/5.21.~~1~~2	National Energy System Operator Limited																													
[REP5-034]~~APP/5.22.1~~	Defence Infrastructure Organisation																													

THE DROVES

SOLAR FARM