



EAST PARK ENERGY

East Park Energy

EN010141

Applicant Response to Examining Authority's Second Written Questions

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Author:	BSSL Cambsbed 1 Ltd / Axis PED Ltd / Burges Salmon LLP

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1.0 INTRODUCTION

1.1 Purpose of this Document

- 1.1.1 The Examining Authority's (ExA's) second written questions **[PD-010]** which were issued on 23rd June 2026, as part of the examination of the application for development consent for the proposed East Park Energy project (the 'Scheme').
- 1.1.2 This response is issued at Deadline 4 in accordance with the **ExA's Rule 8 Letter [PD-006]** issued on 1st April 2026 detailing the examination timetable and procedure.

1.2 Approach

- 1.2.1 The Applicant has presented responses to the ExA's second written questions that are directed to it within **Table 1** of this document. The table provides the reference for the relevant ExA question, the question, and the Applicant's response. The Applicant has also, where it considers that it may be helpful to the ExA, provided comments on questions directed to other parties.
- 1.2.2 The documents submitted with the application and at previous examination deadlines are referenced using the reference number assigned by the Planning Inspectorate (PINS) i.e. **[APP-XXX]**. Where application documents have been updated based on feedback received at Deadline 3, this response document sets out that the relevant updated document is "**[as updated alongside this submission]**".

1.3 Note about National Policy Statements

- 1.3.1 Section 1.6 of the 2026 National Policy Statement (NPS) EN-1 confirms that for schemes accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs should have effect. East Park Energy was accepted for examination in October 2025 prior to the

final publication of the 2025 amendments. The 2024 NPSs therefore have effect for decision making.

- 1.3.2 All references to the NPSs in this document are to the 2024 NPSs unless stated otherwise.
- 1.3.3 The Applicant has prepared a separate **Note on updated National Policy Statements EN-1, EN-3 and EN-5 [PDA-018]**.

2.0 APPLICANT RESPONSES

2.1 Overview

2.1.1 The ExA has asked questions under the following themes / sub-headings, to which the Applicant has responded:

- General and cross-topic questions;
- Design, parameters and other details of the proposed development;
- Biodiversity, ecology and natural environment (including Habitats Regulations Assessment (HRA));
- Compulsory acquisition, temporary possession and other land or rights considerations;
- The draft Development Consent Order (DCO);
- Historic environment;
- Land use and soils;
- Landscape and visual;
- Noise and vibration;
- Water environment; and
- Waste.

2.1.2 The Applicant's responses are presented in **Table 1**, overleaf.

2.2 Applicant Responses

Table 1: Applicant's Response to ExA's second written questions

ExQ2 Ref.	Question:	Applicant's Response
General and cross-topic questions		
Q2.1.1	Construction Duration: Para 2.5.2 of ES – Vol 1 Chapter 2 [APP-038] states that 'it is possible the construction phase could be slightly shorter or longer than 30 months, however for the purposes of this ES, a 30-month programme has been assessed'. The Outline CEMP [REP3-048] at para 2.4.1 also suggests 'approximately 30 months'. Please explain with reference to this whether the ES has assessed a reasonable worst case construction duration? If the construction period were to exceed 30 months would the effects, conclusions, mitigations be different to that which have been concluded in the ES? How will this be secured in the DCO?	The Applicant confirms that the ES is based on a 30-month construction programme, based on experience of constructing other similar-scale installations, and the specifics of this particular Site. This represents a reasonable worst-case construction scenario principally in terms of the intensity and concurrency of construction activity, rather than because 30 months is the longest conceivable programme. As explained at paragraph 2.5.4 of ES Vol 1 Chapter 2 [REP3-023], a number of construction activities and phases have been assumed to take place in parallel. The assessment therefore captures the greatest reasonable concentration of construction plant, workforce, traffic movements and other construction activity. The reference to the programme being "slightly shorter or longer" was intended to recognise ordinary programme contingency and was not intended to provide for an undefined or materially longer construction period. For the purposes of EIA, it is necessary for the Applicant to define a sufficiently clear and consistent assessment scenario so that likely significant effects can be assessed coherently across all technical disciplines. It would not be appropriate for each ES chapter to adopt a different construction duration or programme assumption, as this would risk inconsistency between assessments, particularly where effects are interrelated. The 30-month programme therefore provides a common construction envelope for the ES, including for traffic and transport, noise and vibration, air quality, landscape and

ExQ2 Ref.	Question:	Applicant's Response
		visual effects, ecology, soils, water environment, socio-economics, climate change and cumulative effects. The 30-month programme reflects the Applicant's anticipated construction strategy, including enabling works, access works, civil engineering works, installation of solar infrastructure, BESS and electrical infrastructure, commissioning, restoration and reinstatement. For many construction-related effects, the reasonable worst case is driven by the peak intensity, location and concurrency of activity rather than by the overall calendar duration of the construction phase. An extension beyond 30 months would not necessarily increase the total quantum or peak intensity of construction activity. Where the same works were spread over a longer period, effects determined principally by the intensity or concurrency of activity would remain within, or be less than, those assessed in the ES. However, the Applicant recognises that a longer programme could prolong temporary effects and could be relevant to duration-sensitive matters, seasonal restrictions, and cumulative effects. The Applicant therefore considers that any extension beyond the 30-month period assessed in the ES should require reconsideration of whether the environmental conclusions remain valid. In addition to the existing Requirement 2 of the draft DCO [REP3-009] which requires the submission of a written scheme to the local planning authorities setting out the phases of construction and the timetable for these phases, the Applicant has now amended Section 2.4 and Section 6.0 of the outline Construction Environmental Management Plan [as updated alongside this submission] to include an amendment requiring the final CEMP(s) to include a detailed construction programme and, if the final or revised programme would exceed the 30-month construction programme assessed in the ES, a further environmental assessment. That

ExQ2 Ref.	Question:	Applicant's Response
		further environmental assessment would need to demonstrate that the revised programme remains within the construction assessment envelope assessed in the ES and would not give rise to any materially new or materially different environmental effects. The outline Construction Environmental Management Plan is secured through Requirement 5 of the draft DCO [REP3-009] .
Q2.1.2	Replacement Phase: The Technical Note on Replacement Works [REP3-075] assumes the replacement of infrastructure such as the solar panels and battery storage units (BSU) at least once during the lifespan of the project. At that time: 1) What assurances are there that the frames / solar panels / BSU will be the same size as those being replaced? 2) If there is no guarantee of the replacement size, would this mean that there may be a need for additional piling, foundations or other works to be carried out at this time? 3) If the output of the solar farm PV is restricted to 400MW and the 100MW of Battery Energy Storage System (BESS) as per the connection agreement, would using more efficient infrastructure or more productive panels result in wasted energy? How would this be managed? Would the connection agreement have to be reviewed or revised as part of the operational phase planned maintenance? Alternatively, would there be a reduction in number of panels or BSU in order to limit the exporting / importing of electricity?	1 & 2) The Applicant is required to carry out the development in accordance with Requirement 3 of Schedule 1 of the draft DCO [REP3-009]. The Applicant cannot guarantee that every replacement component installed during the operational life of the Scheme would have identical dimensions to the component being replaced. Solar panels, inverters, transformer and battery storage technologies are expected to continue to evolve over the lifetime of the Scheme, although the Applicant does not expect the typical dimensions available on the market today to change significantly in the future, given the widespread market adoption and that the Scheme will not be unique in requiring future replacements. However, the Applicant notes that the replacement works described in the Technical Note on Replacement Works [REP3-075] set out the replacement of panels and other operational equipment within an already constructed and operational solar farm, principally using the site infrastructure established during the construction phase. The Scheme would not require the wholesale replacement of solar panel mounting structures, new internal tracks, new accesses, new panel support foundations, additional piling, new cable route excavation, new earthworks, or new BESS foundations. The Technical Note on Replacement Works [REP3-075] explains that replacement works would instead comprise the removal and

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		replacement of panels and other equipment within the already authorised and operational Scheme. The Applicant does not expect to replace the solar panel mounting structures wholesale during the operational phase. The mounting structures are passive metal components and, unlike PV modules and active electrical equipment, are not expected to require systematic replacement during the 40-year operational period. Should any individual mounting structures ultimately require replacement then they would be expected to be replaced on a like-for-like basis, and any associated construction would be localised, short-term and undertaken as general maintenance of part of the authorised development. Where solar panels are replaced, replacement panels would be selected so far as reasonably practicable to be compatible with the existing mounting structures, and the Applicant does not expect there to be any future procurement issues which would prevent this. If future panels are not identical in dimensions, this would ordinarily be addressed through alternative rails, clamps or fixings, rather than through the installation of new mounting structures or new panel support foundations. The controlling parameters for the Scheme are therefore the authorised location of Work No. 1 as shown on the Works Plan [APP-009], the minimum and maximum panel heights, the pitch and layout parameters, and the other design parameters and mitigation secured by the Design Parameters and Principles Statement [as updated alongside this submission], rather than a fixed manufacturer module size. Centralised inverters, transformers and BSUs may vary in manufacturer dimensions or specification at the point of replacement. Any replacement would be required to remain within the relevant Work No. 1 or Work No. 2 area as defined on the Works Plan [APP-009], and the maximum parameters set out in

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		Tables 1 and 2 of the Design Parameters and Principles Statement [as updated alongside this submission]. For the BESS, replacement would also be controlled by the Battery Safety Management Plan approved under Requirement 10 of the draft DCO [REP3-009]. Replacement equipment would be selected and installed to fit the existing foundation arrangement, rather than requiring a new or materially different foundation strategy. Whilst the Applicant does not expect this to occur – if a future replacement proposal were to require widespread new mounting structures, new panel support foundations, additional piling, new hardstanding, or other materially different intrusive works, that would not be the replacement scenario assessed in the ES. Such works could only proceed under the DCO where they remained within the authorised development, the relevant design parameters and the maintenance powers in the Order, including the restriction that maintenance works <u>must not give rise to materially new or materially different environmental effects compared with those assessed in the ES</u> (as per Article 4(3) of the draft DCO [REP3-009]). If that could not be demonstrated, the works would not be authorised by the DCO without further consent or approval as applicable. 3) The 400MW export capacity for the solar generating station and the 100MW BESS capacity referred to for the grid connection are not the same as the installed DC nameplate capacity of the solar panels, nor do they require the number or rating of individual panels to be fixed for the lifetime of the Scheme. Paragraph 2.10.55 of NPS EN-3 recognises that the installed generating capacity of a solar farm declines over time as panel efficiency reduces, and that applicants may account for this through overplanting. The Applicant has addressed this point at paragraphs 5.6.5 to 5.6.6 of the Design

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		Approach Document [APP-034]; for ease of reference, the Applicant has repeated these paragraphs here: <i>“The Applicant’s indicative design shown on ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3] is based on utilising 690 watt solar panels, which are now becoming readily available on the UK market. The efficiency and generation capacity of solar panels has been increasing as manufacturing processes improve, and research yields new technologies. It is possible that solar panels could achieve further generation improvements in advance of construction, or through the operational phase, and if commercially viable the Applicant has ensured there is flexibility within the draft DCO [EN010141/DR/3.1] to install them as part of the Scheme. Any improvements to the generation capacity and efficiency of solar panels would allow the Applicant to further maximise the utilisation of the connection agreement.</i> <i>The indicative design shown on ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3] would have an installed capacity of circa 485 MW, which equates to approximately 21.3% overplanting. To maximise the efficiency and commercial viability of the Scheme, the Applicant has been seeking to ensure there would be a minimum of 20% overplanting, but anything over 40% overplanting would likely not make commercial sense to install given the cost / benefit over the course of a full year.”</i> The environmental effects of the Scheme have therefore been assessed by reference to the full physical extent and design parameters of Work No. 1 rather than simply by reference to the 400MW export limit.

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		If panels with a higher wattage are installed at the outset or as replacements during the operational phase, this would be managed through detailed design and operational control systems. The use of more efficient panels would not result in uncontrolled export or require export above the connection agreement. Some inverter clipping or curtailment may occur during peak generating conditions, as is inherent in an overplanted design, but this is a normal part of optimising annual yield and grid-connection utilisation. Excess electricity generated by the solar arrays can also be used to charge the BESS, rather than being exported immediately. The BESS therefore provides an additional means of managing generation and reducing curtailment, by storing electricity generated by the Scheme for later export. The purpose of overplanting is to increase the amount of renewable electricity generated across the year and over the operational lifetime of the Scheme, including by accounting for panel degradation, seasonal variation and system losses. The connection agreement would only need to be reviewed or revised if the Applicant wished to change the agreed export (or import) capacity, or otherwise alter the grid connection arrangements. This would be at the discretion of and require agreement from National Grid. Replacement with more efficient panels within the existing authorised envelope would not, of itself, require a revision to the connection agreement. If at the detailed design or replacement stage fewer panels or a smaller BESS were preferred, that would be permissible provided the final design remained within the authorised maximum parameters, complied with the relevant approved management plans (including the final BSMP for the BESS), and did not give rise to materially new or materially different environmental effects from those assessed in the ES.
Q2.1.3	Outline Battery Safety Management Plan [APP-162]	The Applicant has consulted Cambridgeshire Fire & Rescue Service (CFRS) on this ExA question to check if they require specific details

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	During ISH3, there was reference to a site inspection of the BESS on an annual basis, should this be included in the oBSMP [APP-162]? If not, why not? Is an annual occurrence sufficient?	for site inspections, site familiarisation, or CFRS training exercises to be included in the outline Battery Safety Management Plan (oBSMP) [APP-162] and CFRS has responded to confirm that they do not require this to be included in the oBSMP. The Applicant's position is that oBSMP already covers this issue in sufficient detail. Final site inspection requirements, Emergency Response Plans, and CFRS training programs will be defined at the detailed design stage when a BESS system is selected, in the final Battery Safety Management Plan. The oBSMP [APP-162] already includes details on the following safety and emergency response requirements which must be established / finalised with CFRS before construction commences: • Emergency Response Plan training drills for site operatives, and CFRS engagement for site familiarisation and training drills; • The Applicant will work closely with CFRS to provide all relevant information on BESS and site design features to inform all necessary hazard and risk analysis studies and assist in the development of comprehensive Risk Management Plan and Emergency Response Plans; and • Information will be supplied as early as possible in the detailed design stage to allow an initial appraisal of the BESS to be made. This information will be provided to CFRS with appropriate evidence provided to support any claims made on performance, and with appropriate standards cited for installation. Such information should also be made available to CFRS for inclusion in Site Specific Risk Information (SSRI) records. Section 5.1.9 of the oBSMP [APP-162] states: "<i>The detailed design phase will determine the approach to addressing the following specific requirements, which will be updated prior to construction of</i>

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		the BESS and submitted to Huntingdon District Council and Cambridgeshire County Council as a BSMP, prior to the commencement of construction. The BSMP must include: • A statement on operational procedures and training requirements, including emergency operations; • Emergency Response Plan(s) covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation with CFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community." CFRS confirmed that the BESS site would be classified as risk level 3 which will be visited on completion of construction and reviewed every four years. CFRS crews which are identified to be involved in potential incident response will make between 1-4 site inspections / visits per year (depending on the number of stations involved). The Applicant confirms that training will be provided and can be included as part of these inspections or conducted separately depending on local CFRS resources and availability, this will be agreed at the detailed design stage with CFRS.
Design, parameters and other details of the proposed development		
Q2.2.1	Design Parameters Clarification: The design parameters set out in section 2.0 of the Design Parameters and Principles Statement [REP1-030] includes the maximum dimension for each of the works. In some instances (i.e.	The Applicant has reviewed and updated the Design Parameters and Principles Statement [as updated alongside this submission] as requested to provide greater clarity around the reference point for the different Scheme components.

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	the Solar PV modules, substation control building) in the scale specification it states the height / depth is measured 'above / below ground level', however for other equipment, including the battery storage units, BESS control building, substation fencing etc, under Works No 2 and Works No 3 this baseline is not stated. Please review the document and for all equipment, where relevant, state the baseline from which the height is measured (e.g. existing ground level, finished platform level, ordnance datum).	
<i>Biodiversity, ecology and natural environment (including Habitats Regulations Assessment (HRA))</i>		
Q2.3.1	BNG Trading With respect to the proposed compulsory acquisition of land for BNG, would the proposed BNG provision exclusively serve the proposed development or would some of it be used to facilitate the trading of BNG credits capable of being traded with and purchased by other developers unable to accommodate onsite BNG provision within their proposed developments?	The Applicant is not proposing compulsory acquisition of any land for the purpose of BNG. The Applicant is not proposing to trade any BNG credits for purchase by other developers unable to accommodate on-site BNG provision within other proposed developments.
<i>Compulsory acquisition, temporary possession and other land or rights considerations</i>		
Q2.4.1	BNG and Compulsory Acquisition Noting the minimum level of 10% provision which is due to be enacted via s99 and Schedule 15 of the Environment Act 2021. Explain why it is considered the proposals for BNG provision, which would significantly exceed the statutory minimum requirement, when in force, would satisfy the conditions stated in subparagraph (3) of s122 of PA2008 and meet the guidance included in the "Planning Act 2008 Guidance related to procedures for the compulsory acquisition of land" (Department for Communities and Local Government, September 2013), most particularly the condition	The Applicant does not seek compulsory acquisition powers to acquire land or rights for the purpose of providing BNG.

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	under s122(3) that there would be a compelling case in the public interest for the land to be acquired compulsorily.	
The draft Development Consent Order (DCO)		
Q2.5.0.1	Soil Management Plan: Requirement 7 of the dDCO [REP3-009] does not include within the clause any wording to ensure maintenance over the lifetime of the development, such as including at the end of (3) ...and maintained in accordance with the approved plan throughout the relevant phase of the authorised development to which the plan relates. Why is maintenance not a requirement for the lifetime of the development	The Applicant considers that the existing wording of requirement 7(3) (i.e. "Each phase of the authorised development must be carried out in accordance with the approved soil management plan for that phase.") would imply that the plan would need to be implemented throughout the lifespan of the authorised development. However, the Applicant plans to amend the draft DCO [REP3-009] at Deadline 5 to include explicit reference in the requirement to maintain the Soil Management Plan throughout each phase of the authorised development to which the plan relates.
Q2.5.0.2	Surface Water Management Plan Requirement 14 (1) of the dDCO [REP3-009] – should this also include consultation with Anglian Water Services? In addition, should part (3) include wording to ensure the development is maintained in accordance with the approved plan, such as ...and maintained for each phase of the authorised development unless... Why is maintenance not a requirement for this plan?	In respect of the first point, the Applicant does not consider that Anglian Water Services Ltd should be added as a consultee in relation to the final surface water management plan as there is no intention to discharge water into the public sewer network. In the unlikely event that the Applicant will need to discharge into the public sewer network, Article 18(3) of the draft DCO requires the consent of AWS before any water is discharged into a public sewer or drain owned by AWS. If relevant, AWS will be able to impose any reasonable conditions. In relation to the wording of requirement 14(3), as with the response to Q.2.5.0.1 above, the Applicant considers that the existing wording of the requirement would imply that the plan would need to be implemented throughout the lifespan of the authorised development. However, the Applicant plans to amend the draft DCO [REP3-009] at Deadline 5 to include reference in the requirement to maintain the

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		Surface Water Management Plan throughout each phase of the authorised development to which the plan relates.
Historic environment		
Q2.6.1	Good Practice Guide: The Archaeology and Solar Farms Good Practice Guide was recently published - Archaeology and Solar Farms - Good Practice Guide. Have you reviewed this document, and does it have any implications for the archaeological assessment or the conclusions in the ES? If so, please provide further details and clarification.	The Applicant can confirm that it has reviewed the published Archaeology and Solar Farms Good Practice Guide. The Applicant notes that the approach taken to archaeological assessment (and therefore conclusions presented in the ES) strongly correlate with the Principles for good practice set out in the Good Practice Guide, as set out below. The assessment, therefore, remains robust and there are no implications for the conclusions in the ES. <i>Good Practice Guide Principle 1: Solar Farm Development Plays an Important Role in Delivering Government Renewable Energy Targets</i> The Applicant notes this Principle recognises the need for solar development, but does not have any implications for the archaeological assessment undertaken. <i>Good Practice Guide Principle 2 Archaeological Remains Are A Valued Cultural Resource Worthy Of Protection</i> The Applicant would highlight that a thorough and robust assessment of the potential for, and importance of archaeological remains has been undertaken in order to allow for strategies to be developed to allow for their protection. The assessment work was underpinned by full desk-based assessment ([APP-081]) which was supported by geophysical survey ([APP-084] to [APP-086]) and a settings impact assessment [APP-083]. These assessments were supported by a full gazetteer ([APP-080]) documenting all of the heritage assets identified during the works, photographs taken

ExQ2 Ref.	Question:	Applicant's Response
		during the walkover survey ([APP-082]) and illustrations ([APP-143] to [APP-144]). Along with the above further intrusive works in the form of an archaeological evaluation trenching (results of which are provided in ([REP2-015] to [REP2-018]) have allowed for the identification of Areas of Archaeological Constraint (AACs) which have future management/mitigation proposals detailed within Sections 6.1 and 6.2 of the outline Archaeological Mitigation Strategy [REP2-034]. These included the removal of proposed solar infrastructure within the area of greatest archaeological importance identified within the Scheme which was subsequently scheduled as the 'Small Roman town at Great Staughton'. The Applicant has, therefore, acknowledged that archaeological remains are a valued cultural heritage resource and suggested measures allowing for the protection of remains of greatest significance (principally via the identification of AACs and scheduling of the Roman town, as noted above). <i>Good Practice Guide Principle 3 - Consultation should occur early and be integrated into solar farm planning processes</i> The Applicant would highlight that early and regular consultation with stakeholders (Bedford Borough Historic Environment Team (BBHET), Cambridgeshire Historic Environment Team (CHET) and Historic England) has been undertaken prior to, and during, the assessment as is detailed in Section 6.3 of the Cultural Heritage and Archaeology chapter of the ES [APP-042]. <i>Good Practice Guide Principle 4 - design flexibility can be utilised to protect the significance of archaeological remains</i> The Applicant would highlight that design flexibility has been utilised at various stages throughout the assessment works. This most obviously resulted in the removal of proposed solar infrastructure

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		within the area of archaeological importance identified and scheduled as the 'Small Roman town at Great Staughton'. The design flexibility has also allowed for the proposed utilisation non-intrusive surface-mounted pre-cast concrete ground anchors in twenty-nine of the identified 'Areas of Archaeological Constraint' (AACs). Beyond this, no-dig solutions in relation to temporary access tracks and horizontal directional drilling (HDD) to avoid known areas of archaeological remains have also been proposed. Details of the mitigation approach (which is largely driven by design flexibility) are included within Sections 6.1 and 6.2 of the outline Archaeological Mitigation Strategy (oAMS) [REP2-034]. <i>Good Practice Guide Principle 5 - Defining ground disturbance zones and sensitivity areas provides opportunities to streamline archaeological management and</i> <i>Good Practice Guide Principle 6 - Archaeological Methodologies Should Be Aligned To Specific Site Conditions And Project Impacts</i> The Applicant would highlight that ground disturbance zones (i.e. areas of higher versus lower construction impact) and areas of high archaeological potential (based upon the desk-based research and geophysical survey results) were identified prior to the Phase 1 archaeological evaluation trenching. The Phase 1 evaluation trenching works were undertaken in line with an approved written scheme of investigation (WSI) (approved by CHET, BBHET and HE), which had been developed in line with a brief provided by BBHET and CHET, which allowed for a proportionate approach to the trial trenching based upon the anticipated construction impact and areas of highest archaeological potential. Details of the trenching percentages utilised (and justifications) are included within Section 5 of each of the Trial Trench Evaluation reports ([REP2-015] to [REP2-018]).

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		As noted above the results of the assessment completed to date have been utilised to identify Areas of Archaeological Constraint (AACs) which have future management/mitigation proposals detailed within Sections 6.1 and 6.2 of the oAMS [REP2-034]. <i>Good Practice Guide Principle 7 - High quality non-intrusive evaluation is critical to developing understanding of archaeological potential</i> The Applicant would highlight that high quality non-intrusive evaluation has been undertaken during the assessment which has included a full desk-based assessment ([APP-081]) (utilising HER data, NHLE data, historic map regression, LiDAR data, aerial photographic sources, walkover survey and documentary research) which was supported by geophysical survey ([APP-084] to [APP-086]) and a settings impact assessment [APP-083]. These assessments were supported by a full gazetteer ([APP-080]) documenting all of the heritage assets identified during the works, photographs taken during the walkover survey ([APP-082]) and illustrations ([APP-143] to [APP-144]). These works, as noted above, allowed for the identification of areas of highest archaeological potential, which then informed the brief (produced by BBHET and CHET) provided prior to undertaking the Phase 1 intrusive trial trench evaluation. <i>Good Practice Guide Principle 8 - A pragmatic approach to trial trenching will enhance confidence while enabling development</i> The Applicant notes that a pragmatic approach has been undertaken so far in relation to the Phase 1 evaluation trenching works which, as noted above, utilised a proportionate approach to the trial trenching based upon the anticipated areas of construction impact and areas of highest archaeological potential.

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		The Applicant would further suggest that the Phase 1 trenching completed to date has gone further than the guidance suggests as para 2.8.7 of the guidance indicates that <i>'Untargeted trenching across large areas should be avoided, provided that a wide range of other non-intrusive techniques have been used, the techniques used are considered reliable in that context and the results have not indicated the potential for important archaeological remains'</i>. The Applicant would highlight that areas with limited evidence (i.e. geophysical anomalies or other documented remains) were investigated with a c.1.5% sample of trial trenching, as is detailed in Section 5 of the Trial Trench Evaluation reports ([REP2-015] to [REP2-018]). The Applicant anticipates that the briefs for future phases of investigation (to be provided by BBHET, CHET and HE), and subsequent WSIs for those stage of investigation, will make reference to and follow the principles outlined in the Archaeology and Solar Farms Good Practice Guide and has updated the oAMS [as updated alongside this submission] to include reference to this expectation. <i>Good Practice Guide Principle 9 - Mitigation options should balance archaeological sensitivity with relative impact</i> The Applicant would highlight that the suggested mitigation options outlined in Sections 6.1 and 6.2 of the oAMS [REP2-034] have reference to the archaeological sensitivity of the remains (with areas of highest sensitivity identified as AACs) and the relative impacts (i.e. different suggested approaches for areas of woodland planting which cannot use no-dig solution versus areas where no-dig solution can be utilised). <i>Good Practice Guide Principle - 10 Public benefit and knowledge dissemination should be integrated into the delivery of solar farms</i>

ExQ2 Ref.	Question:	Applicant's Response
		The Applicant would highlight that they are committed to public benefit and the dissemination of knowledge and have produced an outline Heritage Enhancement Strategy (oHES) [REP3-066] which includes details of the already completed, and proposed, strategy relating to public benefit and knowledge dissemination. The oHES is secured by Requirement 16 of the draft DCO [REP3-009].
Q2.6.2	Class Consent Historic England commented in their written representation [REP1-079] that they consider that the long-term management of the roman town scheduled monument (NHLE 1491190) would benefit from a degree of additional control following decommissioning. A planning obligation would be the most appropriate mechanism to use in their opinion and confirms that it is understood reversion to previous land use would not be automatically possible under current legislation, as within 6 years of the establishment of grassland the land would lose its Class Consent. Has the applicant further considered the use of a planning obligation or Conservation Covenant to be the appropriate control in this instance?	The Applicant has further considered and consulted with Historic England on whether a planning obligation or Conservation Covenant would be an appropriate mechanism to secure additional control over the long-term management of the Roman town scheduled monument (NHLE 1491190) following decommissioning. The Applicant does not consider that either a planning obligation or a DCO Requirement to enter into a Conservation Covenant is necessary or appropriate in this instance. The likely effects of the Scheme on the scheduled monument have been assessed, and the mitigation required in respect of those effects is set out in the outline Archaeological Mitigation Strategy [REP2-034]. That document provides the framework for managing archaeological matters during each of the relevant phases of the Scheme and is agreed with Historic England. The additional post-decommissioning control referred to by Historic England would relate to the future stewardship of the scheduled monument beyond the lifetime of the Scheme, rather than mitigation required to address an adverse effect of the Scheme or to make the development acceptable. The Applicant has continued to engage with Historic England on this matter and understands, subject to Historic England's own confirmation, that Historic England no longer seeks a planning obligation or Conservation Covenant to be secured through the DCO in order to resolve this matter. This has been reflected in the updated Statement of Common Ground with Historic England

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		[as updated alongside this submission] where all matters with Historic England are now agreed. The Applicant and landowner are aware of the statutory position in relation to Class Consent. The Applicant understands that, following the establishment and maintenance of grassland within the scheduled area for the operational life of the Scheme, the previous arable operations would not simply be capable of resuming by reliance on Class Consent 1, where the relevant agricultural works had not been carried out in the same location within the previous six-year period. Any future resumption of agricultural works affecting the scheduled monument would therefore need to be considered through the Scheduled Monument Consent regime. This is an important distinction as if the Scheme is not consented, the existing arable use of the scheduled area could continue insofar as it benefits from Class Consent 1. If the Scheme is consented, the scheduled area would be taken out of arable cultivation and managed as grassland for the operational life of the Scheme. Following decommissioning, removal of the Scheme infrastructure would not itself authorise the resumption of arable cultivation within the scheduled area. Any such future change would remain subject to the statutory controls applicable to scheduled monuments at the time. The Applicant therefore considers that the statutory Scheduled Monument Consent regime provides an appropriate control in relation to any future works affecting the scheduled monument after decommissioning (which would not be as a result of the Scheme). In those circumstances, a planning obligation or Conservation Covenant are not necessary to make the Scheme acceptable, would not be directly related to the mitigation of an identified adverse effect of the Scheme, and would not be fairly and reasonably related in scale or kind to the development.

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		The Applicant nevertheless recognises that a Conservation Covenant could, in principle, provide a voluntary mechanism to support the long-term stewardship of the scheduled monument. Any such covenant would be a separate matter for the relevant landowner or qualifying landholder and an appropriate designated responsible body, with input from Historic England as appropriate. It would not need to be secured through the DCO. The Applicant would be willing to engage as an active stakeholder in any future discussions between the landowner, Historic England and any appropriate responsible body during the operational phase of the Scheme. The further archaeological research and investigation proposed in the outline Heritage Enhancement Strategy [REP3-066] could also inform the scope of any such future voluntary management arrangement.
Land use and soils		
Q2.7.1	Permanent or Temporary Loss: It is noted in the Applicant Response to Deadline 2 Submissions – Host Authorities and Statutory Environmental Bodies [REP3-073] at Deadline 3 to BBC-D2-083 and HDC-D2-18 that ‘areas of woodland should not be assessed as a permanent and irreversible loss of land from agricultural use’. - Can you clarify the degree of certainty that the land used for woodland, hedgerow, habitat creation would return to agricultural use and how would this be secured at the end of the operational lifespan and why without a secure commitment that this would not be a permanent loss? - If the land is not returned to agricultural use, can you quantify the extent of land affected, and explain how or whether this	The Applicant notes that the response to BBC-D2-83 and HDC-D2-18 in the Applicant Response to Deadline 2 Submissions – Host Authorities and Statutory Environmental Bodies [REP3-073] was addressing the question of whether woodland, hedgerow and habitat creation should be treated as a permanent and irreversible loss of the agricultural land and soil resource for the purposes of ES Vol 1 Chapter 13 Land and Soils [APP-049]. It was not intended to suggest that every area of woodland, hedgerow, tree planting or habitat creation would necessarily be removed and returned to arable cultivation at the end of the operational life of the Scheme. The Applicant confirms that the solar infrastructure will be removed and that the underlying soil resource will not be permanently sealed, excavated or removed in a way that would prevent future agricultural capability. This is secured through Requirement 18 of the draft DCO [REP3-009], which requires a final Decommissioning

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	would alter the assessment of effects outline in ES – Vol 1 Chapter 13 Land and Soils [APP-049]?	Environmental Management Plan to be submitted to and approved by the relevant local planning authority before decommissioning works are undertaken. The approved DEMP must be in substantial accordance with the outline Decommissioning Environmental Management Plan (oDEMP) [REP3-054] and must be implemented as approved. The oDEMP confirms that, at the end of the operational phase, the Scheme will require decommissioning and that solar PV modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, cable jointing chambers installed for the grid connection and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time. The oDEMP further states that the Site will be returned to a condition suitable for return to its original use after decommissioning. The Applicant does not, however, propose a commitment requiring all woodland, hedgerow, and tree planting to be removed at decommissioning. Such a commitment would not be appropriate, because those features are proposed as part of the landscape, ecological and biodiversity mitigation and enhancement for the Scheme, and would be mature features by the time of decommissioning. The oDEMP therefore sets out that native species woodland and woodland belt planting, native species hedgerow planting and individual native species tree planting would be retained and handed back to the relevant landowners. The oDEMP also states that proposed grazing pasture or neutral grassland and species-diverse grassland could either be retained or reverted to existing arable use at the discretion of the relevant landowners. The Applicant therefore distinguishes between a permanent and irreversible loss of soil function, soil volume or agricultural land

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		capability, and, a future land management decision to retain established woodland, hedgerows, and trees following decommissioning. The former is the matter assessed in ES Vol 1 Chapter 13 [APP-049], and the latter is not, in the Applicant's view, a permanent and irreversible loss of the agricultural land and soil resource. Woodland, hedgerow and grassland habitats do not seal the land or remove the soil resource in the way that permanent built development, hardstanding or access infrastructure may do because, subject to any separate consents or controls applicable at the time, the land would remain physically capable of reversion to agricultural management. The Applicant acknowledges that it cannot be certain that the woodland, hedgerow and tree planting would be reverted to agricultural land in the future due to its wider environmental benefits and current environmental legislation and policy; this could therefore be considered a 'permanent' change, but not one that should be described or assessed as 'irreversible'. The Applicant therefore recognises that this becomes a nuanced point with regard the assessment criteria for determining the magnitude of impact; as set out in Table 13.6 of ES Vol 1 Chapter 13 [APP-049], the difference between a medium and low impact is as follows: • Medium impact - Permanent, irreversible loss of one or more soil functions or soil volumes, over an area of between 5 and 20ha. • Low impact - Permanent, irreversible loss over less than 5ha or temporary, reversible loss of soil-related features (e.g. biomass production). The Applicant has assessed the magnitude of impact as 'low' for planting, meaning a 'temporary, reversible loss of soil-related

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		features'. The Applicant acknowledges that 'temporary' is potentially debatable as the planting is not assumed to be removed, but considers 'reversible' (in the strict sense) is not. The assessment of impact for planting is therefore one that has required professional judgement based on the characteristics of the impact, which has resulted in the conclusion of a low impact as set out at paragraph 13.8.12 [APP-049]. This professional judgement is acknowledged at paragraph 13.4.18 [APP-049] which states that "The IEMA guidance ... notes however that many assessment scenarios may not neatly fall within the definitions provided, and that in all cases professional judgement should be applied by experienced professionals in the context of the specific EIA being undertaken." The Applicant has designed the planting proposals such that at decommissioning, areas of woodland and hedgerows do not restrict the future viability or suitability of individual field parcels for a return to agricultural production. This has been consulted on and agreed with the landowners who the land would revert to at the time of decommissioning, to ensure that planting does not affect their future ability to farm the land once again. The woodland areas as shown on the Illustrative Landscape Proposals at Appendix A of the outline Landscape and Ecological Management Plan [REP3-056] are sited on the following agricultural land grades: • Total proposed woodland on grade 2 agricultural land – 5.74 hectares; • Total proposed woodland on grade 3a agricultural land – 7.69 hectares; and • Total proposed woodland on grade 3b agricultural land – 5.62 hectares.

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		The Scheme also includes approximately 17.4 km of native species hedgerow and 375 individual native species trees. These are linear and point features respectively and are proposed primarily along field boundaries, landscape edges and other locations where they would not prevent the practical agricultural management of adjoining field parcels following decommissioning. If, contrary to the Applicant's position, the proposed woodland areas were added to Table 13.14 of ES Vol 1 Chapter 13 [APP-049] which sets out land subject to permanent adverse impact then the updated values would be: • Grade 2 land – 7.14 ha, which would remain a medium impact and moderate adverse effect, with no change to the assessed level of effect; • Grade 3a land – 12.01 ha, which would become a medium impact and moderate adverse effect, compared with the minor adverse effect reported in ES Vol 1 Chapter 13; and • Grade 3b land – 11.38 ha, which would remain a medium impact and minor adverse effect, with no change to the assessed level of effect. This calculation is provided only as a sensitivity exercise in response to the ExA's question. It is not the Applicant's assessment position, because it assumes that woodland planting should be categorised in the same way as hardstanding or built infrastructure. The Applicant does not consider that to be appropriate as the proposed woodland would not result in the permanent irreversible loss of soil volumes or soil functions, and it would remain unsealed, would continue to perform soil, hydrological, carbon, biodiversity and landscape functions, and would be capable of future reversion to agricultural management if that were pursued by the landowner and any relevant consents were obtained at that time.

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		Accordingly, the Applicant does not consider that the retention of woodland following decommissioning would alter the conclusions of ES Vol 1 Chapter 13 [APP-049], even in the scenario where a different analysis is preferred by the ExA or SoS then impacts on Grade 3a land would only alter to become a medium impact and moderate adverse effect, which for woodland planting would not be judged as a significant adverse environmental effect. The assessment of permanent adverse effects in Chapter 13 relates to those areas where the Scheme would result in permanent built development, hardstanding or infrastructure such that the agricultural land and soil resource could not be easily restored. The proposed planting and habitat creation are materially different in character and effect, and should not in the Applicant's opinion be assessed as permanent irreversible loss of agricultural land.
Q2.7.2	Assessment of Effects: ES – Vol 1 Chapter 13 Land and Soils [APP-049], para 13.8.8 identifies permanent and irreversible impacts to high sensitivity Grade 2 agricultural land during construction, resulting in a moderate adverse, significant effect. However, at decommissioning, the effect is stated to be a similar or lesser magnitude to construction, and it is still assumed that there would be permanent impacts to soil conditions, yet the effect is assessed as negligible and not significant (para 13.8.28). Could you clarify how the permanent residual impacts have been accounted for in the decommissioning phase, and explain further why the decommissioning effects have been assessed as negligible?	The assessment of the decommissioning phase at paragraphs 13.8.27 and 13.8.28 of ES Vol 1 Chapter 13 [APP-049] is addressing whether the decommissioning works would give rise to any further or additional adverse effects on agricultural land and soils that have not been assessed at either the construction or operation phases. It is not intended to re-assess or double-count the same permanent residual impacts already identified at construction. This can be explained as: • Construction phase – this is when the Scheme is constructed and when the permanent residual impacts to agricultural land and soils arise; • Operational phase – there is no further impact or loss to agricultural land beyond that assessed at construction, because the change in land use has already occurred (as per paragraph 13.8.20 [APP-049]);

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		Decommissioning phase – there is again no further impact or loss to agricultural land beyond that assessed at construction, because the change in land use has already occurred. The reference in paragraph 13.8.28 of ES Vol 1 Chapter 13 [APP-049] to the effects at decommissioning being of a “similar or lesser magnitude” to construction considers the nature of the decommissioning activities, such as plant movements, removal of infrastructure, soil handling, backfilling and reinstatement. These activities may have similar types of temporary soil impacts as the construction phase (which would be controlled through a Soil Management Plan), but they would not introduce any new permanent built development or new permanent areas of land take. The purpose of decommissioning is to remove the relevant infrastructure, rather than to create additional permanent impacts. Where paragraph 13.8.28 [APP-049] states that “<i>it is assumed there would be permanent impacts to soil conditions (as assessed at the construction phase)</i>”, this is intended to make clear that the ES has retained a precautionary assessment of permanent residual impact where permanent adverse effects were identified at construction. It was not intended to suggest that the same permanent impacts arise again at decommissioning. The Applicant's position is that those impacts are counted once, at the point they occur, and remain part of the overall residual effects of the Scheme. They are not counted again at decommissioning because that would overstate the Scheme's effects by treating a single residual effect as if it occurred twice. The decommissioning phase has therefore been assessed as negligible because, over and above the permanent residual impacts already identified at construction, the decommissioning works would not result in any additional permanent loss or reduction of soil functions, soil volumes or agricultural land capability. Any potential

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		temporary impacts associated with decommissioning, such as compaction, excavation, soil handling or reinstatement, would be controlled through the final DEMP and associated decommissioning phase Soil Management Plan, secured through Requirements 18 and 7 respectively of the draft DCO [REP3-009] .
Q2.7.3	Decommissioning: The oDEMP [REP3-054] states that 'infrastructure that is more than 1m below ground level, such as cable conduit and casing will only be left in place where the damage caused by recovering them is considered greater than the environmental benefits of recovering and recycling them'. Please confirm, noting NPS EN-3 paragraph 2.10.60 which sets out an expectation to dig up cabling, whether this would allow for the prior use of the land to continue, including with any potential for future degradation of infrastructure remaining and any subsequent potential for future contamination of the land?	The Applicant confirms that the approach set out in the outline Decommissioning Environmental Management Plan (oDEMP) [REP3-054] does not provide for the routine retention of underground cabling and would not prevent the prior use of the land from continuing following decommissioning. The Applicant recognises that NPS EN-3 paragraph 2.10.68 sets out an expectation that, at decommissioning, panel arrays, mounting structures and underground cabling will be removed so that the prior use of the land can continue. The Applicant notes that paragraph 2.10.69 of NPS EN-3 recognises that there may be circumstances where retaining certain infrastructure, including underground cabling, may be less harmful than removal. The approach at paragraph 2.4.2 of the oDEMP [REP3-054] is consistent with that policy position, with the starting point being removal, and any retention limited to deeper below-ground infrastructure only where a site-specific assessment demonstrates that the environmental harm caused by removal would outweigh the benefits of recovering and recycling it. The Applicant notes that the ducting/conduit used is typically HDPE (or similar polyethylenes) and is used specifically because it is chemically resistant in soils and so would not be expected to result in long-term pollution. The final DEMP, to be submitted to the relevant local planning authorities for approval in accordance with Requirement 18 of the draft DCO (in consultation with the Environment Agency and the relevant nature conservation

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		body), will set out any below ground infrastructure to be retained along with any justification for its retention. The Applicant notes that the Environment Agency (EA) is satisfied with the approach set out in the oDEMP, as per Item EA008 of the Environment Agency's Deadline 3 submission [REP2-053], and confirmed in the Deadline 4 version of the Statement of Common Ground with the Environment Agency [as updated alongside this submission]. The final DEMP approval process provides for EA consultation, with the EA being the relevant statutory body for matters including controlled waters, waste regulation and contaminated land. The approach adopted by the Applicant and agreed by the EA allows any residual issue relating to degradation, contamination risk, waste management or the protection of controlled waters to be reviewed at the decommissioning stage, using the evidence and regulatory standards applicable at that time.
Landscape and visual		
Q2.8.1	Accuracy of document: Environmental Statement - Vol 1 Chapter 2 The Scheme [APP-038] Table 2.5 of ES - Vol 1 Chapter 2 The Scheme [APP-038] states the scale of the battery storage units would be a maximum height of 4.4m, however para 5.4.20 of ES - Vol 1 Chapter 5 Landscape and Visual [APP-041] refers to 4.0m above ground floor level when considering the zone of theoretical visibility (ZTV) of the BESS, whilst figure 5-3d of ES - Vol 3 Chapter 5 Landscape and Visual Figures - Part 1 of 14 [APP-129] which is referred to in para 5.4.20 of the ES - Vol 1 Chapter 5 Landscape and Visual [APP-041] states 4.4m in the key. Can you review the documents, update any	The Applicant has reviewed the referenced documents. Table 2.5 of ES Vol 1 Chapter 2 [APP-038] correctly states the maximum height of the Battery Energy Storage System (BESS) units as 4.4 m above ground level. ES Vol 3 Figure 5-3d [APP-129], which illustrates the Zone of Theoretical Visibility (ZTV) for the taller elements of the Scheme, also correctly identifies the BESS units as having a maximum height of 4.4 m above ground level. The reference to a maximum height of 4.0 m above ground level in paragraph 5.4.20 of ES Vol 1 Chapter 5 [APP-041] is a typographical error and should read 4.4 m above ground level. The ZTV presented in ES Vol 3 Figure 5-3d [APP-129] and the associated assessment have been undertaken using the correct

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	dimensions required and confirm the assessment has been carried out on the worst case?	worst-case height of 4.4 m. Accordingly, the error is confined to the text of paragraph 5.4.20 and does not affect the findings or conclusions of the LVIA. The Applicant has amended this error in an updated ES Vol 1 Chapter 5 [as updated alongside this submission] .
Noise and vibration		
Q2.9.1	Noise Mitigation for PRow In your LIR [REP1-075] you make reference to construction and decommissioning noise impacting on PRow users. How would you propose for this to be mitigated?	The Applicant notes this question is directed at Cambridgeshire County Council, but has elected to provide the following response. The Applicant recognises that users of public rights of way may experience construction and decommissioning noise where they pass close to working areas. However, any such effects would be temporary, localised and intermittent. PRow users would generally be moving through the area rather than remaining at a fixed receptor location for a prolonged period. The Applicant therefore considers that the appropriate mitigation is to manage the source of construction and decommissioning noise, maintain safe and clearly managed PRow routes, and provide temporary localised management where works are taking place close to PRowWs. Construction noise would be controlled through the final Construction Environmental Management Plan, secured by Requirement 5 of the draft DCO [REP3-009], which must be substantially in accordance with the oCEMP [REP3-048]. This would include the use of best practicable means for construction noise control, including measures such as the selection and maintenance of appropriate plant, switching off plant when not in use, avoiding unnecessary revving or idling, sensible siting of stationary plant and generators where practicable, and managing the timing and sequencing of particularly noisy activities. Table 5.6 of the oCEMP [REP3-048] includes measures to mitigate the potential impact of noise on equestrian users. The same general

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		approach would apply to decommissioning through the final Decommissioning Environmental Management Plan, secured by the draft DCO [REP3-009] and required to be substantially in accordance with the oDEMP [REP3-054] .
Water environment		
Q2.10.1	ES – Vol 1 Chapter 8 Hydrology and Flood Risk [REP3-025] The first bullet in ES Chapter 8, para 8.2.3 has an 'Error!Bookmark not defined' text after the Water Framework Directive Regulations, please review and update as necessary.	The Applicant has reviewed and updated ES Vol 1 Chapter 8 [as updated alongside this submission] to amend this error.
Q2.10.2	ES – Vol 1 Chapter 8 Hydrology and Flood Risk [REP3-025] – Study Area: Can you provide further details to those provided in paras 8.6.4 to 8.6.6 of ES – Vol 1 Chapter 8 Hydrology and Flood Risk [REP3-025] on the study area for assessing the water environment, including how this has been devised and the size and radius of the study area or outline where this information is included in the chapter.	In the absence of any specific guidance relating to solar developments, professional judgement has been used to estimate the likely extent of potential impacts and based upon previous experience assessing similar scale solar developments within lowland agricultural environments in England. Impacts upon water quality are generally considered on a catchment basis (using WFD catchments overlapping with the Site), which is considered to be a conservative scale. Beyond this (i.e. more downstream catchments), it can reasonably be assumed that solar development impacts, especially in lowland catchments, are unlikely to have any significant adverse impacts on the water environment, due to the attenuation, dilution and deposition processes that would occur. In the case of private water supplies (Section 8.6.35 of ES Vol 1 Chapter 8 [REP3-025]), a 5 km radius from the Site was applied, which is considered to be a very conservative study area. Flood risk is considered within the Site and to third parties outside of the Site which are hydrologically linked. This work has been supported by hydraulic modelling to assess surface water risk

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		(considered the dominant mechanism of flooding to the Site). The study area for this work (to determine contributing catchments and downstream impact) was determined through use of exiting EA flood maps, to delineate observable contributing areas and catchment delineation by ground elevation data. The Applicant notes that the Environment Agency is satisfied with the Applicant's assessment, with all matters agreed in the updated Statement of Common Ground with the Environment Agency [as updated alongside this submission].
Q2.10.3	Water Supply: Anglian Water (AW) in their RR [RR-069] requested further information on the water supply and demand requirements and how these will be sourced. It has been suggested that a piped connection will be secured with AW for the operational phase. Can the applicant update on the progress of securing this connection and if this is not secured how will water be supplied during the operational phase?	The Applicant has continued to engage with Anglian Water and has obtained a Pre-Planning Assessment Report: Domestic Foul Water Drainage Feasibility Study and Potable Water Supply Assessment for East Park Energy, dated 25 March 2026 and valid until 25 March 2027. The report confirms that Anglian Water has assessed the public water supply network to identify a sustainable point of connection for the Scheme, and that the water supply for the operational phase can be provided from the existing mains, with the connection point identified as the existing main in the B645, close to the existing pump house. The current position is therefore that the Applicant has secured an in-principle agreement from Anglian Water which identifies the connection point and the works required to provide a potable water connection. The final connection will be confirmed at the detailed design stage, post consent.

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Q2.10.4	Flood Maps – Surface Water Climate Change: The Environment Agency updated the Flood Map for Planning on 28 May 2026 to add surface water climate change events and depth layers. Have you reviewed this information, and does it have any implications for the scheme and submitted documentation? If so, please provide further details and comments.	The Applicant has reviewed the Environment Agency's updated Flood Map for Planning surface water spatial planning datasets, published on 28 May 2026, insofar as they relate to the Order Limits and the panelled areas of the Scheme. The update introduces surface water climate change extents and banded depth information within the Flood Map for Planning. The updated mapping uses the upper-end climate change allowance for the 2070s epoch, 2061 to 2125. This epoch is relevant to the lifetime of the Scheme, however, the Applicant has already undertaken bespoke site-specific pluvial hydraulic modelling for the Scheme because the national surface water mapping available at the time did not provide results for the 2070s climate change epoch. The site-specific modelling assessed the relevant surface water flood events, including the 1% AEP plus climate change event, and applied a 40% climate change allowance, corresponding to the upper-end allowance for the 2070s epoch. The outputs of the site-specific modelling have informed the design of the Scheme, including the identification of areas where the bottom edge of panels are required to be raised to provide 300 mm freeboard above the maximum modelled flood level. The submitted assessment therefore already considers the relevant future surface water flood risk scenario now reflected in the updated Flood Map for Planning. Accordingly, the updated Environment Agency mapping does not give rise to any change to the design of the Scheme, the proposed mitigation, the conclusions of the Flood Risk Assessment, or the conclusions of the ES. It also does not require any change to the draft DCO or to the secured management plans. For completeness, and to provide a transparent check against the new national mapping, the Applicant has prepared comparison plots

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		between the updated EA surface water flood mapping and the equivalent site-specific model outputs. These are included in an updated Hydraulic Modelling Report [as updated alongside this submission]. This confirms that the Applicant's site-specific modelling remains appropriate for the purposes of assessing flood risk and informing the design of the Scheme.
Q2.10.5	Access Track Crossings - Watercourses: With reference to the matter raised by BBC (Matter 38 in their LIR [REP1-071]) could the applicant point the ExA to where the removal of access track crossings over watercourses and drainage ditches would be ensured post construction or at decommissioning.	The Applicant has updated Section 2.4 of the outline Construction Environmental Management Plan [as updated alongside this submission] to confirm that temporary access tracks and temporary crossings over watercourses or drainage ditches used for construction would be removed following completion of the relevant construction works, with affected land and drainage features reinstated. The Applicant has also updated paragraph 2.4.2 of the outline Decommissioning Environmental Management Plan [as updated alongside this submission] to confirm that access tracks installed for the Scheme, new or modified junctions to the public highway, and associated crossings over watercourses or drainage ditches would be removed at decommissioning. A consequential amendment has also been made to paragraph 2.4.4 of the oDEMP to avoid any ambiguity regarding the retention of access tracks.

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Waste		
Q2.11.1	Waste from Solar PV: The figure for waste generated from PV panels during the operational phase in Table 2 of the oWMP [APP-164] exceeds the waste from PV panels during decommissioning. Please explain the basis for this conclusion and does this represent a reasonable worst-case scenario? If the replacement rate and contingency of 10% as set out in the Technical Note on Replacement Works [REP3-075] differs during the operational phase, what would be the implications for waste volumes, waste capacity, transport movements assessed in the ES?	The figures in Table 2 of the oWMP [APP-164] provide a cumulative estimate of PV module waste arising during the 40-year operational phase, whereas Table 3 provides an estimate of PV module waste arising on decommissioning at the end of the operational phase. The operational phase estimate for solar photovoltaic modules is approximately 29,000 tonnes, whereas the decommissioning phase estimate is approximately 26,400 tonnes. The difference arises because the operational phase estimate includes the assumed replacement of all installed PV panels once during the operational phase, together with a 10% contingency. By contrast, the decommissioning phase estimate assumes the removal of all PV modules present on the Site at the point of decommissioning. The Applicant considers this to represent a reasonable worst-case scenario for the purposes of the ES and the oWMP. It is conservative because it assumes, over the operational life of the Scheme, a full replacement of each installed PV panel, notwithstanding that some panels may continue to operate satisfactorily for longer, and it then applies a further 10% contingency to capture additional individual or localised replacements resulting from faults, damage, or other operational requirements. If the actual replacement rate during the operational phase were lower than the assessed assumption, there would be a corresponding reduction in PV panel waste arisings, waste management requirements and associated transport movements. If the actual replacement rate were higher, the implications would be expected to increase broadly in proportion to the number of additional panels replaced, including in respect of waste volumes, waste capacity requirements and transport movements. However, a

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		change in replacement rate would not, of itself, necessarily give rise to materially new or materially different environmental effects; this would depend on the scale, timing, duration and intensity of any replacement campaign and the waste management arrangements in place at that time. Should a future replacement scenario materially exceed the assessed basis, it would be managed through the controls secured by the final OEMP and WMP, including the major replacement campaign notification process where applicable. Where any future proposal has the potential to give rise to materially new or materially different likely significant effects, it would need to be subject to appropriate further assessment and any necessary approval before being undertaken.

