

In previous solar DCO Examinations, ISH1 would normally cover procedural matters such as the dDCO, extent of order limits (including NGNS in this case) and the description of development. It might also cover high level points on specific topics, where there was to be subsequent detailed topic specific ISHs to follow. It is noted that procedural matters around the dDCO are not programmed to be heard at all in an ISH and would be grateful for guidance on when these might be considered.

According to the draft programme, it is noted that ISH1 would be heard before either the Council's LIR or WR are to be submitted / fully drafted therefore any discussion at ISH1 would be premature especially as the ExA is required to take account of the Council's LIR in decision-making. We have concerns that the agenda would not be framed around points that the LPA intend to make. We appreciate that the Council has submitted a relevant representation, however, that is a high level summary and not an in-depth analysis of the issues.

Another point that the Council wishes to be noted is that the sheer number of topics to be covered in ISH1 means that there is not enough time for these topics to be given the depth of scrutiny that they warrant. We have concerns that members of the public or local interest groups would have an expectation of a greater level of consideration especially given the amount of interest in the proposals with over 400 relevant representations having been submitted by individuals and groups covering a range of topic areas.

Given the suggested list of topics in the Rule 6 letter, the maximum range of topics that NKDC would consider on ISH1 are air quality, traffic and transport and water environment since they are more discrete matters and may be the single subject of concern by other interested parties.

We'd expect there to be further ISHs to allow more detailed discussion on these topics:

- alternatives and site selection
- cumulative effects
- grid connection
- landscape and visual impacts
- cultural heritage
- traffic and transport
- soils and BMV agricultural land
- ecology

If the ExA intends to proceed with ISH1 as programmed, we would welcome further clarity on specific points or questions that are to be discussed under each topic heading in order that the Council may assist the ExA better at the hearing. For example, is ISH1 to be structured around the draft ExQ1 questions? We would appreciate advance notice of these points or questions of least 5 working days in order to prepare.