

## **White Elm Solar Farm - EN0110003 ELMYA RPC UK Grange Road Limited**

### **Section 51 Advice Log Version: 27 February 2025**

There is a statutory duty under [section 51 \(s51\) of the Planning Act 2008](#) for the Planning Inspectorate to record the advice that it gives in relation to an application or potential application, and to make this publicly available.

This document comprises a record of the advice that has been provided by the Inspectorate to the applicant (ELMYA RPC UK Grange Road Limited) and their consultants during the pre-application stage. It will be updated by the Inspectorate after every interaction with the applicant during which s51 has been provided. The applicant will always be given the opportunity to comment on the Inspectorate's draft record of advice before it is published.

The applicant will use this Advice Log as the basis for demonstrating regard to section 51 advice within the application.

Project name s51 Advice Log - Index	
Date of meeting	Meeting overview
<a href="#">1 November 2024</a>	EMAIL Programme Document feedback
<a href="#">18 February 2025</a>	Project Update Meeting

Project name -s51 Advice Library	
Topic	Email 1 November 2024
Programme Document	<p>Thank you for submitting your Programme Document alongside your EoI response to request a tier of service for the Pre-Application stage.</p> <p>The document has been reviewed in line with the guidance for Applicants on the following two webpages:</p> <p><a href="https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects">Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects - GOV.UK (www.gov.uk)</a></p> <p><a href="https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus">Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK (www.gov.uk)</a></p> <p>The Adequacy of Consultation Milestone (AoCM) seems to be missing from the project timeline. As one of primary service features to be engaged with in the pre-application stage, it is considered a fundamental general requirement. The Planning Inspectorate considers submitting the AoCM three months prior to the intended application submission to be reasonable. Please advise when we should expect to receive yours, update your Programme Documents project timeline accordingly, and publish the updated Programme Document to your project website.</p>
Topic	Meeting date: 18 February 2025
Project Programme (post-meeting advice)	<p>The applicant revised its Programme Document in December 2024, which has been reviewed by the Inspectorate against its 2024 Pre-application Prospectus and the government's guidance on the pre-application stage.</p> <p>The Inspectorate advises that the revised Programme Document should include:</p> <ul style="list-style-type: none"> <li>• a clear description of the proposed development and its location;</li> <li>• the applicant's view on the main issues, even at the early stage, for resolution and the pre-application activities the applicant will undertake to address those;</li> </ul>

	<ul style="list-style-type: none"> <li>• the applicant's proposals for engaging with statutory consultees and local authorities during the pre-application period and any intended financial support agreements; and</li> <li>• the applicant's identification of risks to achieving the pre-application stage and the process by which these risks are to be tracked and managed.</li> </ul> <p>It is understood that the information provided will continue to be refined and expanded upon, in future editions of the Programme Document as an iterative process, as the proposed development progresses through the pre-application stage.</p> <p>It would also be helpful if the applicant could:</p> <ul style="list-style-type: none"> <li>• explain whether any non-DCO consents or licences will be needed;</li> <li>• add any indicative dates for Project Update Meetings to be held with the Inspectorate in its programme timetable;</li> <li>• explain whether the Programme Document has or will be shared with relevant statutory bodies for their views on its proposed programme; and</li> <li>• add any dates for holding multiparty meetings (if these are to be pursued by the applicant) or under the Evidence Plan process (if relevant).</li> </ul> <p>Under the 'standard' pre-application service tier, the Inspectorate can attend multiparty meetings (outside of the Evidence Plan process) on an observer or advisory basis, as explained in its 2024 Pre-application Prospectus.</p> <p>It would also be useful if the applicant could indicate in its Programme Document, whether it intends to submit a Design Approach Document (to explain its design principles and the evolution of the proposed development) and a Policy and Compliance Document with its application, as well as how the local authorities will provide views and any supporting material in relation to the Adequacy of Consultation Milestone.</p> <p>In respect of the 'standard' pre-application tier and its draft document review service, the Inspectorate advises that it aims to provide s51 advice within six weeks of receipt of any draft documents submitted for review. The Inspectorate respectfully asks that applicants provide advance notice, within its programme timetable, of when draft documents are expected to be submitted to ensure appropriate resources at the Inspectorate are in place.</p>
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National Grid Substation	<p>White Elm Solar Farm has accepted a grid connection offer from NGESO (now called NESO), enabling it to connect to the existing Bramford to Norwich 400kV transmission circuit (Bramford-Norwich Main 400kV Circuit 1). This connection will be facilitated through a new 400kV National Grid Electricity Transmission (NGET) owned substation, named “Elmya Grange”, which is yet to be consented as its final location is being considered by NGET. This new substation is planned to be built along the existing Bramford to Norwich circuit, a portion of which traverses the proposed White Elm Solar Farm in a north-east to south-west direction. The Applicant is proceeding on the basis that this substation will be located within or adjacent to the Order Limits. The applicant is not seeking development consent for the substation (albeit it will seek consent for the on-site 400kV cables required to connect to it) as the substation will be developed and owned separately by NGET using a separate consenting process.</p> <p>The applicant was advised that if it intends to consult the public and statutory consultees on a zone of options in relation to its grid connection, the information should be sufficient enough to allow for intelligent consideration and response (in view of the Gunning principles). The applicant was also advised that any optionality under the Rochdale Envelope in relation to the grid connection should be clearly outlined and assessed in its submitted Environmental Statement on a ‘worst case’ scenario basis.</p>
Scoping Opinion	<p>The applicant was advised that no late responses had been received to date from consultees to the scoping process. The Inspectorate advised that any late responses received will be shared with the applicant and published accordingly.</p> <p>The Inspectorate advised that the scoping opinion published is a formal opinion that takes into account the consultation responses received. However, the Inspectorate’s scoping opinion is its own view of the matters arising from the scheme and does not need to align with all views received during the consultation process. The final scoping opinion is a proportional response to the proposed development.</p> <p>The applicant was advised to sign post to where human health has been assessed in the Environmental Statement (ES), rather than presenting a stand-alone chapter on the topic.</p> <p>The Inspectorate further advised that a table should be included at the start of each chapter of the ES outlining what consultation responses were received in connection to the</p>

	<p>topic and provide a summary of how comments received have been considered.</p> <p>The applicant was advised that the Inspectorate does not have communication with the consultation bodies that provided scoping responses. The applicant was advised that it is their responsibility to discuss and agree with the consultation bodies on any information they deem to be required or methodology to be used, or explain any departures from such recommendations or requirements in its application documents.</p>
Principal Areas of Disagreement Summary Statements (PADSS)	<p>The Inspectorate advised the applicant that they could consider using PADSS as a mechanism for consultees to present unfettered evidence to the pre-application process, and clearly set out any key areas of disagreement. It would be the applicant's role to initiate pre-application PADSS with relevant consultees, should this be a suitable option for its proposed development. PADSS are then owned and authored by the consultees moving forward. However, it is for the applicant (where the 'standard' pre-application service tier is being followed) to decide whether it would be beneficial to employ PADSS in addition to Statements of Common Ground (SOCG). Further information on PADSS (and the differences between PADSS and SOCG) can be found in the Inspectorate's <a href="#">2024 Pre-application Prospectus</a>.</p>