Planning Inspectorate

Application by The Droves Solar Farm Limited for The Droves Solar Farm

The Examining Authority's written questions and requests for information (ExQ1): Issued on 13 May 2026

Responses are due by deadline 1: Tuesday 2 June 2026

The following table sets out the Examining Authority's (ExA's) written questions and requests for information - ExQ1. If necessary, the examination timetable enables the ExA to issue a further round of written questions in due course. If this is done, the further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework derived from the initial assessment of principal issues provided as **annex D** to the Rule 6 Letter dated 8 April 2026. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which interested parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with 1 (indicating that it is from ExQ1) and then has an issue number and a question number. For example, the first question on air quality and emissions issues is identified as Q1.1.1. When you are answering a question, please start your answer by quoting the unique reference number.

You should respond to the questions by using the **Have your say** function on the project page of the National Infrastructure website and selecting 'Responses to Examining Authority's First Written Questions (ExQ1)' when asked.

If you are responding to a small number of questions, you can submit your answers by choosing 'Make a comment' and entering your answers in the 'Your comments' box. If you are answering a larger number of questions you should download a copy of the Microsoft Word version of the document, enter your answers and save the document using an appropriate file name. You can then submit the completed document by selecting 'Upload files'.

Microsoft Word version: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000413-Examining%20Authority's%20Written%20Questions%201%20(ExQ1)%20(Word).docx

Download a copy of this Microsoft Word version of the ExA's written questions, enter your answers and save the document using an appropriate file name. You can then submit the completed document by choosing 'Make a comment' and selecting 'Upload files'.

Abbreviations used:

PA2008	Planning Act 2008
AP	Affected Person
BESS	Battery Energy Storage System
BDC	Breckland District Council
BMV	Best and Most Versatile
BoR	Book of Reference
CA	Compulsory Acquisition
CAPC	Castle Acre Parish Council
dDCO	draft Development Consent Order
EA	Environment Agency
EM	Explanatory Memorandum
ES	Environmental Statement
ExA	Examining Authority
HDD	Horizontal Directional Drilling
NCC	Norfolk County Council
NPPF	National Planning Policy Framework
NPS	National Policy Statement – published in 2023 (came into force 17 January 2024)
NSIP	Nationally Significant Infrastructure Project
NWT	Norfolk Wildlife Trust
oBSMP	outline Battery Safety Management Plan
oCEMP	outline Construction Environmental Management Plan
oCTMP	outline Construction Traffic Management Plan
oDS	outline Decommissioning Strategy
oLEMP	outline Landscape and Ecological Management Plan
oOEMP	outline Operational Environmental Management Plan
oSMP	outline Soil Management Plan
PRoW	Public Right of Way
PV	Photo-voltaic
RR	Relevant Representation
R	Requirement
SoS	Secretary of State
SoR	Statement of Reason
TP	Temporary Possession

The Examination Library

References in these questions set out in square brackets (for example [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link: XCAT01 - Examination Library template

It will be updated as the examination progresses.

Citation of questions

Questions in this table should be cited as follows:

Question reference: issue reference: question number, for example ExQ1 1.0.1 – refers to question 1 in this table.

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ExQ1	Question to:	Question:
1.	**General and cross-topic questions**	
Q1.0.1	The applicant	**Environmental Statement (ES) Figure 2.1: Cumulative Schemes** Figure 2.1 [APP-068] shows there is an overlap of the proposed development's Order limits with the short list of cumulative schemes. Could the applicant update Figure 2.1 to annotate clearly each scheme from the short list (to include High Grove Solar Farm) and provide details of any interaction or overlaps.
Q1.0.2	The applicant	**Community Benefits** With reference to the Consultation Report [APP-025], Table 22 states: *"Throughout the pre-application process, the Applicant has consulted on community benefits and, based on feedback and ongoing discussions, will determine how best to distribute funding."* Could the applicant clarify what community benefits are proposed and how these would be secured?
Q1.0.3	The applicant	**Planning History – overlap with portion of cable route** Table 1.1, Planning Statement [APP-043], describes that a portion of the cable route from application reference Breckland District Council 3PL/2022/1215/F overlaps with the proposed development along the A1065 from the two southern land parcels to the land which lies in the field south of the junction between the A1065 and Southacre Road. With reference to paragraph 3.5.4, Planning Statement, could the applicant provide further details of its assessment that there are no significant implications arising from the location of the proposed development upon any of the identified planning permissions.
Q1.0.4	The applicant	**Project-level design principles – post consent** Table 1-1, Design Approach Document [APP-045], describes that where these plans and documents allow for flexibility within detailed design, project-level design principles may be secured within the outline management plans to inform future design choices (within the consented parameters) post-consent. (i) Could the applicant provide further detail on what specific measures would be implemented and secured to ensure that good design is achieved post-consent to include the topic of landscape and visual? (ii) Could the applicant confirm what post-consent arrangements are proposed for the design champion?
Q1.0.5	The applicant	**Castle Acre Parish Council's representations** Castle Acre Parish Council's (CAPC) concerns in its Relevant Representation (RR) [RR-013] include: *"In particular, the proposal fails to:* • *Demonstrate that reasonable alternatives, including less harmful locations for key infrastructure, have been properly assessed.* • *Provide sufficient evidence that the harm to identified heritage assets, their setting, and the wider cultural landscape of the Nar Valley are clearly outweighed by public benefits, as required by NPPF* (National Planning Policy Framework) *Paragraphs 199–202.* • *Adequately assess cumulative impacts within the Nar Valley and the wider context of extensive existing and proposed energy infrastructure.* • *Provide sufficient certainty that archaeological and ecological assets would not be irreversibly harmed."* Could the applicant comment on each of the above concerns.
2.	**Aviation**	
Q2.0.1	The applicant	**Proposed meeting with the Defence Infrastructure Organisation (DIO) to discuss effects on aviation** During the Issue Specific Hearing 1 [EV5-004], the applicant proposed a meeting with the DIO prior to deadline 1 to discuss the effects from the proposed development on aviation at RAF Marham. Following the above meeting, could the applicant include an update in its Statement of Common Ground (SoCG) with the DIO regarding its proposals to address the DIO's concerns referred to in its RR [RR-051] which includes: (i) Interference with the Precision Approach Radar (PAR) (ii) Safeguarding to manage birdstrike hazard to air traffic using RAF Marham (iii) RAF Marham's air traffic control staff in the air traffic control tower could be subject to the effects of glare from the proposed development and that glint or glare effects might impact on some aviation procedures
Q2.0.2	The applicant	**Cumulative effects for aviation receptors** Paragraph 16.6.37, ES Chapter 16 [APP-065], states that:

ExQ1	Question to:	Question:
		"For aviation receptors, cumulative effects are possible; however, modelling suggests that the glare intensity categorisation would not increase towards any of the aviation receptors when considering the schemes cumulatively (see Section 7.2.2 of ES Appendix 16.2:Solar Photovoltaic Glint and Glare Study [APP/6.4]). No significant impact is therefore predicted, though this will continue to be considered as further details emerge regarding High Grove Solar." Could the applicant provide an update regarding possible cumulative effects for aviation receptors from High Grove Solar Farm?
3.	**Biodiversity and Ecology (including Habitats Regulations Assessment)**	
Q3.0.1	The applicant Natural England	**Bird surveys – Stone Curlew** An IP RR [RR-058] includes concerns that: *"As stone curlew nesting on arable land is dependent on crop rotation (they will usually only nest in years when there are spring-sown root crops) they may only nest one year in every 4 or 5 years so a survey in a single year may not record any of this species. It is therefore unsafe to conclude that "no significant adverse effects on Breckland SPA in relation to functionally linked land are anticipated". Effects on stone curlew would not be limited to the construction phase; the operational phase may also deter nesting."* An IP [RR-019] also raises concerns regarding sightings of Stone Curlew in both 2024 and 2025, and refers to: *"The RSPB have also previously submitted on this Droves project & stated that a minimum of 3 years of Stone Curlew survey work should be enacted before any decisions are made about this industrial scale solar project. Please can you also confirm that this RSPB submission is being put into action?"* Could the applicant and Natural England comment on the above concerns, to include commenting on whether sufficient bird surveys have been undertaken to support the conclusion quoted above?
Q3.0.2	The applicant Natural England	**Sufficiency of Bird Surveys** CAPC [RR-013] is concerned that the bird surveys submitted are 'insufficiently' comprehensive to provide confidence that all protected and red-listed species which have previously been recorded on the proposed site and in the surrounding area have been fully identified. Could the applicant and Natural England comment on the above concern.
Q3.0.3	The applicant	**Ground-Nesting Bird Mitigation Habitat Sequencing** The outline Landscape and Ecological Management Plan (oLEMP) [APP-191] describes the Ground-Nesting Bird Mitigation Habitat from paragraphs 7.3.95 to 7.3.104. Could the applicant confirm the proposed phasing of these works in relation to the proposed construction sequencing and how this would be secured?
Q3.0.4	The applicant	**Biodiversity Net Gain Assessment Report** Paragraph 5.1.3, Biodiversity Net Gain (BNG) Assessment Report [APP-184], notes that the Norfolk Local Nature Recovery Strategy (LNRS) has been formally published/adopted on 31 October 2025 and accordingly, the BNG assessment will be updated in order to reflect the published LNRS and also ensure that the identified trading errors are resolved appropriately. Could the applicant please provide an update on when the BNG assessment will be updated to take account of the above points**.**
Q3.0.5	The applicant	**Protection of veteran trees** With reference to National Policy Statement (NPS) EN-1 paragraph 5.4.32, could the applicant provide further details on how it would address the following concerns from the Forestry Commission's RR [RR-131] and how these would be secured in the draft Development Consent Order (dDCO) [APP-018]. • some construction traffic will utilize [sic] existing access tracks that are in the root protection areas of some of the veteran trees. • an increase in traffic, particularly heavy construction traffic could lead to habitat degradation. • any effect from the incursion into root protection areas of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction.
Q3.0.6	The applicant	**The effect of decommissioning on Biodiversity Net Gain** ES Chapter 7 [APP-056], paragraph 7.11.21 includes that: *"following the implementation of the proposed mitigation and enhancement measures, ecologically valuable habitats will be entirely retained and protected with buffers maintained throughout the construction, operational and decommissioning phases."*

ExQ1	Question to:	Question:
		Draft DCO [APP-018] R20 (1) states: *"The date of decommissioning for each part of the authorised development must be no later than 60 years following the date of final commissioning*." Given the above inconsistency, could the applicant clarify whether the above proposed mitigation and enhancement measures, ecologically valuable habitats would be entirely retained and protected with buffers during the decommissioning phase and if so would remain insitu permanently; or would they be decommissioned.
Q3.0.7	The applicant	**Woodland Blocks** The Forestry Commission [RR-131] advise that it would ideally like to see woodland creation carried out in 5 hectare (ha) blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha. (i) Confirm the areas of the proposed individual woodland blocks. (ii) Can the Forestry Commission's advice be accommodated? If not, provide justification.
Q3.0.8	The applicant Natural England	**Effects on bat species** (i) An IP [RR-058] requests a review of the research from the University of Stirling's Article Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity, which concludes that "Ground-mounted solar photovoltaic developments have a significant negative effect on bat activity". (ii) Norfolk Wildlife Trust (NWT) [RR-045] raises a significant concern that the proposed siting of substations and Battery Energy Storage System (BESS) within Fields 24 and 27 coincide with some of the highest levels of bat activity recorded on site, as identified in the Baseline Ecology Report. In particular, it states: *"15. The presence of barbastelle bats, a protected species, within the red line boundary is of particular concern. Paragraph 7.7.25 (Chap 7, ES) states that no new lighting is proposed within the Solar PV* (Photo-Voltaic) *Site areas and that new lighting will be limited to locations essential to security, namely the Customer Substation, National Grid Substation, and Battery Energy Storage System (BESS).* *16. Currently, the BESS and substation are proposed to be located within fields 24 and 27. These are the fields with some of the highest recordings if* [sic] *bat activity."* Could the applicant and Natural England comment on each of the above concerns.
Q3.0.9	The applicant Natural England	**Skylark and curlew mitigation area - impact from new pylons** NWT [RR-045] raises concerns that new pylons would be installed and that this pylon route would run straight through the new area proposed for skylark and curlew mitigation. Furthermore, NWT is concerned that installing pylons in an area proposed for curlew mitigation could significantly undermine the success of the area by causing issues of collision for adult birds and by providing perches for predators; and that guidance is that new infrastructure such as pylons should not be placed in sensitive areas. Could the applicant and Natural England comment on the above concern regarding the impact from the proposed new pylons on the effectiveness of the skylark and curlew mitigation area.
Q3.0.10	The applicant Natural England	**River Nar - Biodiversity Action Plan** CAPC concerns [RR-013] include that the River Nar (a chalk stream of designated as a Site of Special Scientific Interest (SSSI)) supports an outstanding assemblage of dragonflies as well as the Biodiversity Action Plan mollusc species, Desmoulins' whorl snail, listed as 'endangered'. Could the applicant and Natural England comment on the above concern.
Q3.0.11	The applicant Natural England	**Deer presence and activity** Sporle with Palgrave Parish Council's (PC) RR [RR-054] includes concerns that despite the PC's request in its response to the statutory consultation, no survey of deer numbers has been undertaken, nor a deer management plan undertaken with surrounding landowners and the High Groves development. Could the applicant and Natural England comment on the above concern.
Q3.0.12	The applicant	**Habitats Regulations Assessment – Consideration of decommissioning phase activities** Could the applicant clarify how decommissioning phase activities have been assessed for the Habitats Regulations Assessment (HRA).

ExQ1	Question to:	Question:
4.	**Climate change**	
Q4.0.1	Breckland District Council (BDC) & Norfolk County Council (NCC)	**Greenhouse Gas (GHG) Impact Assessment Methodology** Are BDC and NCC content with the methodology, assumptions and limitations used in the Lifecycle GHG impact assessment as set out in the updated Chapter 13 of the ES [AS-020]?
Q4.0.2	The applicant	**GHG Reduction Strategy** Paragraph 5.3.7 of NPS EN-1 states that the steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy secured under the DCO; no GHG Reduction Strategy document was provided at application stage. The outline CEMP [APP-186] includes mitigation measures for reducing GHG emissions during construction, however the outline OEMP focuses mostly on measures for climate change adaptation. These two outline plans only focus on identified mitigation and do not set out all the steps taken, through design decisions, to minimise carbon emissions. In the absence of a GHG Reduction Strategy document, could the applicant provide further details on how they have met the policy requirement in paragraph 5.3.7 of NPS EN-1, detailing how design and layout decisions considered carbon minimisation, as well as how operational management will minimise carbon emissions? Could the applicant also confirm how the supply chain would be managed post-consent to ensure GHG emissions are minimised and the mechanism through which this would be secured in the dDCO?
Q4.0.3	The applicant	**Sourcing of Solar Panels and Batteries** Paragraph 5.3.9 of NPS EN-1 requires the Secretary of State (SoS) to be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development. The applicant states in the updated Chapter 13 of the ES [AS-020] that the manufacturer of the PV panels and BESS is assumed to be based in China with table 13-22 stating the transportation costs of these aspects from China equates to 6.76% of the total CO_2e emissions for the construction phase. (i) What reasonable steps are proposed to reduce the GHG emissions of the construction and decommissioning stage of the proposed development? (ii) Could the applicant set out how other options to source PV panels and batteries from locations nearer to the development site were considered and why these were discounted?
Q4.0.4	The applicant	**Non-road mobile machinery (NRMM) mitigation** Paragraph 13.4.15 of updated Chapter 13 of the ES [AS-020] refers to several measures for NRMM which, if assumed to be in place, the applicant considers there wouldn't be any significant emissions from tippers or other NRMM. However, the outline CEMP [APP-186] only refers to these measures as 'recommended' mitigation. Could the applicant consider rewording of the mitigation references for NRMM in the outline CEMP making commitment to them more explicit, given the reliance upon these measures being in place as part of the assumptions for the GHG emissions presented in Chapter 13 of the ES?
Q4.0.5	The applicant	**Carbon Equivalent Calculations** Updated chapter 13 of the ES [AS-020] sets out the carbon calculations used as part of the GHG impact assessment within section 13.9, however there is no appendix providing evidence of all the canulations undertaken. There are inconsistencies in some of the numbers presented within the chapter, for example paragraph 13.9.15 has inconsistencies in the weight of silicon assumed for the panels, and paragraph 13.9.25 appears to have an error in the quoted tCO_2e for the transformers and switchgear elements. The clarity of information available regards the Lifecyle carbon assessment is also raised by an IP [RR-002]. In the interest of transparency for all interested parties, could the applicant check that the all the calculations and numbers presented in section 13.9 are correct and where corrections are required, provide an updated chapter as necessary?
5.	**Compulsory acquisition, temporary possession and other land or rights considerations**	
Q5.0.1	The applicant	**Option Agreements** In the Statement of Reasons (SoR) [APP-021] the final paragraph of Section 4, includes that:

ExQ1	Question to:	Question:
		"In summary, at the time of submission of the DCO Application, Option Agreements have been entered into with the relevant landowners for the elements of the Site that comprise the Solar PV Site, the BESS, the Customer Substation and the National Grid Substation and heads of terms have been issued for the remainder of the rights required." Furthermore, paragraph 4.1.3 states: *"Notwithstanding where an agreement has been reached, it is necessary for the Applicant to be granted the compulsory acquisition powers included in the draft DCO [APP/3.1] so as to protect against a scenario whereby contracts are not adhered to or are otherwise set aside, for example: (i) freeholder owners of the land within the Order land (where agreement has been reached) do not grant a lease of the land in accordance with the terms of the completed option agreements; or (ii) the contracting party dies, is subject to divorce proceedings, or is declared insolvent. In those circumstances, it would be in the public interest for the Scheme to proceed and the interests in question effectively converted into a claim for compensation. The Applicant also needs powers to suspend rights and override easements and other rights in the Order land to the extent that they would conflict with the Scheme."* (i) Could the applicant confirm the durations of the lease included in the above Option Agreements for the Solar PV Site, the BESS and the Customer Substation? (ii) In the case of the National Grid Substation and the Grid Infrastructure, how does the option agreement take account of the outline Decommissioning Strategy [APP-190], paragraph 2.1.3 which states: "The National Grid Substation and the Grid Connection Infrastructure would remain in situ."?
Q5.0.2	The applicant	**Unknown ownership, occupation, or interests in land** In paragraph 4.1.4 of the SoR, the applicant notes: *"There are a number of plots within the Land Plan [APP/2.2] which are not registered at Land Registry. Following diligent inquiry, ownership of a number of these plots has been established, however, there are interests identified in the Book of Reference [APP/4.3] where it has not been possible to identify ownership. Three statements ("Unknown, The Occupier and The Owner") are given in the Book of Reference [APP/4.3] when diligent inquiry has been carried out and it has still not been possible to obtain information. The Applicant has carried out searches and enquiries with the Land Registry, site visits and notices have been and will be erected on site to seek to identify unknown landowners or persons with an interest in the land."* (i) Could the applicant set out what further steps will be undertaken up to the end of the Examination to identify unknown ownership, occupation, or interests in land?
Q5.0.3	The applicant	**Updates during the Examination** (i) Could the applicant provide updates to the matters requested in Appendix F of the Rule 6 letter [PD-006] at relevant Examination deadlines: a) Updates to the Book of Reference (BoR) [APP-023], SoR [APP-021] and Land Plan [APP-008]; b) Updates to the Land and Rights Negotiation tracker [APP-024] to include identifying progress with all unknown landowners (For example, plot number 2-25) or persons with an interest in the land; and (ii) Can the applicant ensure that any changes to the BoR [APP-023] are, where necessary, carried through to the SoR [APP-021].
Q5.0.4	The applicant	**Acquisition of freehold** With reference to the BoR [APP-023], the applicant seeks to acquire the freehold of plot numbers 1-01, 1-06, 1-11, 2-14, 2-17, 2-18, 2-20, 2-24, 2-25, 2-26, 2-29, 2-30, 3-38, 3-39, 3-41, 4-43, 4-45. (i) In each case, and in the context of the temporary nature of the proposed development, please could the applicant explain how it has minimised the powers sought? (ii) Why is it not sufficient to acquire rights and/ or impose restrictive covenants?
Q5.0.5	Affected Persons (APs)	**Affected Persons positions** APs are asked to please provide comments on the following: (i) If they are aware of any inaccuracies in the BoR [APP-023], SoR [APP-021] or Land Plans [APP-008]? If so, please indicate where these are and provide the correct details. (ii) Views on whether there may be any reasonable alternatives to the Compulsory Acquisition (CA) or Temporary Possession (TP) sought by the applicant. (iii) Views on whether there are any areas of land or rights that the applicant is seeking the power to acquire that you consider are not needed.

ExQ1	Question to:	Question:
		(iv) Details of any other concerns relating to the legitimacy, proportionality or necessity of the CA or TP powers sought by the applicant that would affect the land that you own or have an interest in.
Q5.0.6	The applicant Statutory Undertakers	**Statutory Undertakers interests** With reference to the BoR [APP-023] is any of the land that is proposed to be acquired Statutory Undertakers' land for the purposes of s127(3) of the Planning Act 2008 (PA2008)? (i) Provide an indication of whether any impediments to securing agreements are envisaged? (ii) Do the Statutory Undertakers have any concerns about whether the tests set out in s127(3)(a) or (b), s127(6)(a) or (b), and s138(4) of the PA2008 have been met?
Q5.0.7	The applicant	**Category 3 persons** Part 2 of the BoR [APP-023] lists 'Category 3' persons. The applicant is asked to please: (i) Provide further detail/justification of how you have identified Category 3 persons for the purposes of the BoR; (ii) Clarify if there are any persons who might be entitled to make a relevant claim if the DCO were to be made and fully implemented, and who therefore should be added to the BoR as a Category 3 person. This could include, but is not limited to, those who have provided representations on, or have interests in: • Noise, vibration, smell, fumes, smoke or artificial lighting; • The effect of the construction or operation of the proposed development on property values or rental incomes; • Concerns about subsidence or settlement; • Claims that someone may need to be temporarily or permanently relocated; • Impacts on a business; • Loss of rights eg. to a parking place or access to a private property; • Concerns about project financing; • Claims there may be viable alternatives; or • Blight
Q5.0.8	The applicant Breckland District Council Norfolk County Council	**Possible impediments** (i) Is the applicant aware of any land or rights being required in addition to those sought through the dDCO [APP-018] before the proposed development can become operational? (ii) Do BDC or NCC have any concerns about whether potential impediments to the development been properly identified and addressed? Are they aware of any matters within or outside the scope of the dDCO that may have a bearing on whether the development could become operational, or may not be satisfactorily resolved, including in relation to acquisitions, consents, resources, or other agreements?
Q5.0.9	National Highways and Norfolk County Council	**Highway land and interests** Are NCC and National Highways (NH) in their role as the Highway Authorities aware of: (i) Any reasonable alternatives to the CA or TP sought by the applicant; and/or (ii) Any areas of land or rights sought by the applicant that they consider would not be needed.
Q5.0.10	The applicant	**Book of Reference** Any person entitled to enjoy easements or other private rights over land which the applicant proposes to extinguish, suspend or interfere with identified in Part 3 of the BoR [APP-023] should also be recorded in Part 1 as a person within categories 1 or 2 as set out in section 57 of the Planning Act 2008. The applicant is asked to please confirm the BoR has been drafted accordingly?
Q5.0.11	The applicant	**Reasonable alternatives to CA** In the light of the relevant guidance "Planning Act 2008: procedures for the compulsory acquisition of land" (September 2013) and in particular paragraph 8, the applicant is asked to please explain how the Examining Authority (ExA) can be assured that all reasonable alternatives to CA (including modifications to the scheme) have been explored?

ExQ1	Question to:	Question:
		Please set out in summary form, with document references where appropriate, what assessment/comparison has been made of the alternatives to the proposed acquisition of land or interest in each case.
Q5.0.12	The applicant	**Grid Connection location** Paragraph 4.4.2 of the SoR [APP-021] states that: *"It cannot yet be confirmed exactly where within the Grid Connection Infrastructure the new pylons for the new overhead transmission electric line will be located, as the exact location will be determined following the detailed design of the Scheme. Compulsory acquisition powers are therefore being sought over the Grid Connection Infrastructure to enable the Applicant to carry out the relevant works with the minimum of inconvenience to affected landowners, and to allow for minor variances to the location of the new pylons to avoid potential engineering difficulties, or otherwise, to enable the construction of the Scheme within programme and with the minimum of disruption to landowners and the wider community."* The applicant is asked to please explain how this approach accords with the need for the SoS to be satisfied that the applicant is seeking no more land than is reasonably required for the purposes of the development.
Q5.0.13	The applicant	**Funding Statement** The Funding Statement [APP-022] identifies the current cost estimate for the scheme is approximately £900 million to £950 million, which includes construction costs, preparation costs, supervision costs, land acquisition costs (including compensation payable in respect of any compulsory acquisition), equipment purchase, installation, commissioning, and power export. Paragraph 17 of the guidance "Planning Act 2008: procedures for the compulsory acquisition of land" (September 2013) states the Funding Statement should provide as much information as possible about the resource implications of both acquiring the land and implementing the project for which the land is required. The applicant is therefore asked to please provide the following additional information: (i) Identification of the CA costs separately from the project costs with an explanation of how a figure for CA costs was arrived at. (ii) Paragraph 2.3.3 of the Funding Statement, states that assuming the SoS grants development consent for the Scheme, IGP would seek further funding with the support of its legal and financial advisors, as is common in privately funded infrastructure projects. What further information/evidence can be provided to demonstrate that adequate funding is likely to be available? (iii) What financial arrangements would be put in place to secure the decommissioning of the proposed development at the end of its operational lifetime and what allowance has been made for this in the current cost estimate?
Q5.0.14	The applicant	**Land Plans** The applicant is asked to please explain meanings of the references to 'temporary use of land' in relation to both pink and blue land shown in the key to the Land Plans [APP-008].
Q5.0.15	The applicant	**Protective Provisions** Provide an update on negotiations for protective provisions with each party set out in Schedule 15 of the dDCO [APP-018] to include the concerns raised by Anglian Water in its RR [RR-003]
6.	**Cultural Heritage and Archaeology**	
Q6.0.1	The applicant	**Potential overgrounding of cable runs in areas known to contain significant archaeological remains** Paragraph 8.7.8, ES Chapter 8: Cultural Heritage and Archaeology [APP-057], states: *"Embedded mitigation might also comprise the overgrounding of cable runs in areas known to contain significant archaeological remains."* Could the applicant provide further details on how they would propose to manage the decision process for considering the use of overground cables in the above circumstances, what has been assumed as a worst-case in ES Chapter 6: Landscape and Visual [APP-055] and what would be the implications for any other topic areas within the ES?
Q6.0.2	The applicant	**Significant In-combination Effects for Visual and Heritage** Table 17-3, Chapter 17: In-Combination Effects [APP-066], shows a significant adverse effect for visual and heritage for the decommissioning phase only for the Change to the heritage setting of Castle Acre Castle and Castle Acre Priory.

ExQ1	Question to:	Question:
		Could the applicant provide further information to support the above finding and in particular provide the reasoning as to why the effect is only in the decommissioning phase.
7.	**Draft Development Consent Order (DCO)**	
7.0	**Part 1 - (Preliminary), Article 2 Interpretation**	
Q7.0.1	The applicant	**"authorised development"** – this definition in the dDCO [APP-018] includes 'any other development within the meaning of Section 32 (meaning of "development") of the 2008 Act authorised by this Order'. Paragraph 4.2.2, EM [APP-019], describes that the approach to defining "Authorised Development" is consistent with other made Orders such as the Longfield Solar Park Order 2023, the Cottam Solar Project Order 2024, the West Burton Solar Project Order 2025 and the Tillbridge Solar Order 2025. The applicant is asked to please provide justification as to why this wording is required in addition to the development described in Schedule 1. Specifically, the applicant is asked to provide justification as to why this does not align with the approach adopted in the West Burton Solar Project Order 2025 made 24 January 2025 which included the wording below: *"authorised development" means the development and associated development, which is development within the meaning of section 32 (meaning of "development") of the 2008 Act, authorised by this Order and as described in Schedule 1 (authorised development);"*
Q7.0.2	The applicant	**"Maintain"** - Paragraph 4.2.2, EM [APP-019], provides examples of the activities anticipated to be covered by maintain. Is this approach to defining "maintain" consistent with other made Orders? If so, please provide the names of the Orders.
7.1	**Part 2 - Principal Powers**	
Q7.1.1	The applicant	**Article 3(2) (Development Consent etc. granted by this Order)** The EM [APP-019] sets out that the purpose of Article 3(2) of the dDCO [APP-018] is to provide the undertaker with a necessary, but proportionate, degree of flexibility when constructing the authorised development with particular reference being made to allow for variances in ground conditions and choice of appropriate equipment and technology. (i) Can the applicant please explain why it considers the degree of flexibility sought is necessary and proportionate for this proposed development? (ii) To improve clarity, could the applicant consider amending the dDCO to include the following in bold: *3.—(1) Subject to the provisions of this Order and the requirements* ***in Schedule 2 (requirements)****, the undertaker is granted development consent for the authorised development to be carried out within the Order limits.*
Q7.1.2	The applicant	**Article 4 – Operation of generating station** Regarding Article 4, could the applicant clarify the inconsistency between EM [APP-019] paragraph 1.4.1, which states "*It comprises a generating station of more than 50MW, being the NSIP* (Nationally Significant Infrastructure Project)*, and which is described in Work No. 1 in Schedule 1 to the draft DCO [APP/3.1]."* and paragraph 4.2.10 which refers to *""Generating station" in this Article would include the energy storage facility".*
Q7.1.3	The applicant	**Article 5 (Power to maintain the authorised development)** Article 5(3) of the dDCO [APP-018] does not authorise maintenance activities if they will give rise to any materially new or different environmental effects to those identified in the ES. Noting the wide-ranging nature of the definition of 'maintain', the applicant is asked to please explain how maintenance activities would be managed so as to ensure that they would not give rise to materially new or different environmental effects. References should be made to specific requirements, management plans and procedures.
Q7.1.4	The applicant	**Article 6 (Application and modification of statutory provisions)** The EM [APP-019] sets out that Article 6 of the dDCO [APP-018] seeks to disapply a number of statutory provisions listed at 6(1) on the basis that they address matters whose merits and acceptability can, and will, already have been sufficiently considered and resolved if the draft DCO [APP-018] is made. Noting the guidance set out in Advice Note 15, section 25, the applicant is requested to please redraft EM paragraphs 4.2.13 to 4.2.18 to provide clear justification for the inclusion of each of these provisions, including reference to the outcomes of engagement with any relevant authority or government department which would have responsibility for the provisions that would be modified.

ExQ1	Question to:	Question:
		With reference to Articles 6(2) and 6(3), the applicant is asked to please justify these provisions by explaining why it is necessary for this proposed development.
Q7.1.5	The applicant	**Article 7 (Defence to proceedings in respect of statutory nuisance)** With reference to Article 7 of the dDCO [APP-018], the applicant is asked to: (i) Expand on the explanation set out in paragraph 4.2.21 of the EM [APP-019] by setting out why the broad defence in Section 158 of the Planning Act 2008 is not sufficient, such that this additional provision is required. (ii) Confirm that the controls elsewhere in the dDCO are sufficient to justify the defence being provided by this article to statutory nuisance claims relating to noise. (iii) Review the wording at the start of 7(1)(c) as there is repetition of 'the nuisance' following on from the end of 7(1).
7.2	**Part 3 - Streets**	
Q7.2.1	Norfolk County Council	**Article 9 (Application of the permit scheme)** NCC is asked to please comment on the drafting of Article 9 of the dDCO [APP-018] and whether it raises any issues for it.
Q7.2.2	The applicant	**Article 10 (Power to alter layout, etc., of streets)** Regarding Article 10, could the applicant clarify the inconsistency between EM [APP-019] paragraph 4.3.4 which refers to this provision being necessary for, among other things, decommissioning, and article 10(2) which makes no mention of decommissioning as a purpose for which it can be used.
Q7.2.3	The applicant Norfolk County Council	**Article 10 (Power to alter layout, etc., of streets)** With reference to Article 10 of the dDCO [APP-018], paragraph (2) confers a general power enabling the undertaker to alter the layout of any street, subject to the consent of the street authority. The ExA notes National Highways comments in its RR [RR-037]. The applicant is asked to justify why this power is necessary and has consideration been given to whether or not it should be limited to identified streets. NCC is asked to comment on the breadth of the power and whether it raises any issues for it.
Q7.2.4	The applicant	**Article 12 (Temporary closure, restriction or prohibition of use of streets and public rights of way)** Could the applicant provide justification as to why the power is appropriate and proportionate having regard to the impacts on pedestrians and others of authorising temporary working sites in these streets.
Q7.2.5	The applicant	**Article 14 (Access to works)** With reference to Article 14 of the dDCO [APP-018], whilst 13(b) refers the power to form and layout temporary means of access, the applicant is asked to please consider whether it should include provision to restore any access that has temporarily been created.
7.3	**Part 4 – Supplemental Powers**	
Q7.3.1	The applicant	**Article 17 (Discharge of water)** With reference to Article 17 of the dDCO [APP-018], the EM [APP-019] refers that this article has precedent in the West Burton Solar Project Order 2025. For the Discharge of Water, Article 16 for the West Burton Solar Project Order 2025 includes 8 paragraphs whereas the Article 17 of the dDCO includes only 7 paragraphs. Article 17 of the dDCO excludes the wording in paragraph 5 of Article 16 of the West Burton Solar Project Order 2025. Could the applicant review all of the differences between the above articles and provide justification for any proposed changes from the West Burton Solar Project Order 2025.
Q7.3.2	The applicant	**Article 18 (Removal of Human Remains)** Could the applicant provide more specific detail, with references to supporting documents, to include the location of any burial features within the site, to support the justification included in paragraph 4.4.2 of the EM [APP-019] that there is a risk of human remains associated within the Order limits.
Q7.3.3	The applicant	**Article 19 (Protective works to buildings)** With reference to Article 19 of the dDCO [APP-018], paragraph 4.4.5 of the EM [APP-019] explains that this Article is required because there are buildings within, and in close proximity to, the Order Land that might feasibly require surveys and protective works as a result of the authorised development. The applicant is asked to please identify these buildings and explain the nature of protective works likely to be required. An update to the EM is also requested in this regard.

ExQ1	Question to:	Question:
7.4	**Part 5 – Powers of Acquisition**	
Q7.4.1	The applicant	**Article 21 (Compulsory acquisition of land)** With reference to Article 21 of the dDCO [APP-018], the EM [APP-019] refers that this article has precedent in the West Burton Solar Project Order 2025. For the Compulsory acquisition of land, Article 19 for the West Burton Solar Project Order 2025 excludes paragraph 1(b) included in the Article 21 of the dDCO. Could the applicant review all of the differences between the above articles and provide justification for any proposed changes from the West Burton Solar Project Order 2025 to include confirmation that the articles referenced in 21(2) of the dDCO are correct and complete.
Q7.4.2	The applicant	**Article 24 (Compulsory acquisition of rights)** Article 24 is drafted to enable compulsory acquisition of new rights over all of the Order land, with a schedule which limits the compulsory acquisition power in defined plots to the defined rights listed in that schedule (Schedule 9). (i) Could the applicant clearly identify its approach (allowing undefined rights in land not listed in that Schedule), explain the need for it and justify it in the Explanatory Memorandum (EM) and SoR. (ii) Could the applicant provide evidence to show that persons with an interest in the Order land were aware that undefined new rights were being sought over all of the Order land and were consulted on that basis.
Q7.4.3	The applicant	**Article 24 (Compulsory acquisition of rights)** With reference to Article 24 of the dDCO [APP-018], the EM [APP-019] refers that this article is well precedented drafting including the West Burton Solar Project Order 2025. For the Compulsory acquisition of rights, Article 22 for the West Burton Solar Project Order 2025 excludes paragraph 7 included in the Article 24 of the dDCO. Could the applicant review all of the differences between the above articles and provide justification for any proposed changes from the West Burton Solar Project Order 2025.
Q7.4.4	The applicant	**Article 25 (Private rights)** With reference to Article 25 of the dDCO [APP-018], the EM [APP-019] refers that this article is well precedented drafting including the West Burton Solar Project Order 2025. For Private rights, Article 23 for the West Burton Solar Project Order 2025 excludes the wording drafted in paragraph 8 of Article 24 of the dDCO. Could the applicant review all of the differences between the above articles and provide justification for any proposed changes from the West Burton Solar Project Order 2025.
Q7.4.5	The applicant	**Article 31 (Temporary use of land for constructing the authorised development) and Article 32** **(Temporary use of land for maintaining the authorised development)** Whilst Schedule 11 of the dDCO [APP-018] indicates land for which temporary possession may be taken, Article 31(1)(a)(ii) has the effect of extending this power to allow temporary possession of any Order land. Article 32 gives such powers over any land within the Order limits (which extends beyond the Order land). (i) Whilst the EM [APP-019] refers to this allowing a more proportionate approach to the extent of land and rights acquisition, the applicant is asked to please further justify the inclusion of these broad powers and to explain the steps that have been taken to alert all landowners/occupiers of land within the Order limits of this possibility. (ii) The applicant is asked to please justify the inclusion of 'buildings' in Article 31(1)(b). (iii) With reference to the 14 day notice of intended entry referred to in Article 31(3), the applicant is asked to please justify the reason for this short length of time. (iv) Regarding Article 31, whilst the EM [APP-019] paragraph 4.5.18 refers to land in Schedule 11, due to article 31(1)(a)(ii) temporary possession powers are not limited to land listed in Schedule 11. Could the applicant comment on this inconsistency. (v) The applicant is also asked to please explain why it considers that only 28 days' notice should be required before entering on and taking possession of land under Article 32(3).

ExQ1	Question to:	Question:
		(vi) Under the Neighbourhood Planning Act (NPA) 2017 (which, by virtue of article 6(1)(g), the applicant is seeking to disapply), the notice would also have to state the period for which the acquiring authority is to take possession. Should such a requirement be included in this case? (vii) The NPA 2017 Act provisions include the ability to serve a counter-notice objecting to the proposed temporary possession so that the landowner would have the option to choose whether temporary possession or permanent acquisition was desirable. Should this article make some such provision – whether or not in the form in the NPA 2017?
Q7.4.6	The applicant	**Article 39 (Planning Permission)** Could the applicant provide further justification as to why these provisions are necessary in this particular dDCO in the circumstances of the proposed development.
Q7.4.7	The applicant	**Article 40 (Felling or lopping of trees and removal of hedgerows)** Could the applicant provide further justification as to why it is necessary for the extent in 40(1) to refer to "near any part of the authorised development".
Q7.4.8	The applicant	**Article 49 (Maintenance of drainage works)** Could the applicant provide further justification as to why these provisions are necessary in this particular dDCO in the circumstances of the proposed development.
7.5	**Schedule 2 - Requirements**	
Q7.5.1	The applicant	**Requirements requiring submission of details for approval by the relevant planning authority** EM [APP-019] paragraph 5.2.3 in so far as it refers to the Relevant Planning Authority (rather than the applicant) needing to consult third parties in relation to the document submitted to them. Could the applicant to confirm whether this approach has been accepted in any previously made DCOs.
Q7.5.2	The applicant	**Requirement (R) 5 (Detailed design approval)** With reference to Schedule 2 R5 of the dDCO [APP-018], the requirement states that no parts of Works Nos.1, 2 or 3A may commence until details relating to the part have been submitted and approved by the relevant planning authority. (i) The applicant is requested to please explain how details of design approval are proposed in relation to the Works Nos. 4 to 11 inclusive. (ii) To improve clarity and for consistency with the EM [APP-019], paragraph 5.2.11, for the last sentence in 5(1) could the applicant consider adding the text in bold below: "*relating to that part have been submitted* ***to*** *and approved by the relevant planning authority for that part."*
Q7.5.3	The applicant	**R11 – Surface and foul water drainage** Could the applicant clarify if R11 regarding the approval of the surface and foul water drainage systems would include for: • two emergency water tanks referred to in Table 6.1, outline Battery Safety Management Plan [APP-194]; and • requirements for fire suppressant volume, paragraphs 12.4.38 to 12.4.44 from ES Appendix 12.2: Flood Risk Assessment [APP-170] which includes a penstock, linked to an automated system, and Sustainable Drainage System (SuDS) structures serving the BESS compound would be sized to accommodate the 1% Annual Exceedance Probability (AEP) +40% Climate Change (CC) and an additional 228m^3, and this would be sufficient for storing the full fire suppressant volume during an extreme rainfall event.
Q7.5.4	The applicant	**R11 – Surface and foul water drainage** As requested by BDC in its relevant representation [RR-011], could the applicant update the requirement wording to include for the Lead Local Flood Authority (LLFA) to be consulted on the surface and foul water drainage plan in addition to the EA and Anglian Water Services Ltd?
Q7.5.5	The applicant	**R16 - Public rights of way and permissive paths** 16(3) states "*Before approving the public right of way and permissive path management plan the relevant planning authority shall consult with the relevant highway authority."* For consistency with R15, could the applicant review if the use of 'shall' could be replaced with 'must'.
Q7.5.6	Breckland District Council Norfolk County Council	**R18 - Skills, supply chain and employment** Could the councils confirm if they are content with the wording for R18 regarding the Skills, supply chain and employment?

ExQ1	Question to:	Question:
Q7.5.7	The applicant	**R20 - Decommissioning and restoration** The dDCO [APP-018], R20 states: "20.—(1) The date of decommissioning for each part of the authorised development must be no later than 60 years following the date of final commissioning." The outline Decommissioning Strategy (oDS) [APP-190], paragraph 2.1.3 states: "*The National Grid Substation and the Grid Connection Infrastructure would remain in situ.*" Regarding decommissioning, the dDCO refers to each part of the authorised development, while the oDS excludes the National Grid Substation and the Grid Connection. Could the applicant review this inconsistency and update the relevant document accordingly?
7.6	**Explanatory Note**	
Q7.6.1	The applicant	***Explanatory Note*** Could the applicant confirm the location referred to as *"[TBC]*"
8.	**Flood risk, hydrology and water resources**	
Q8.0.1	The applicant	**Effects on groundwater during construction** ES Chapter 12: Water Resources [APP-061], Table 12-20 identifies that for groundwater additional mitigation of a piling foundation risk assessment is proposed to mitigate the effects of chemical pollution and erosion sedimentation. The outline Construction Environmental Management Plan (oCEMP) [APP-186] does not provide any further detail of a piling foundation risk assessment. Could the applicant provide further detail on how this risk assessment would mitigate the risk and how this would be secured in the dDCO?
Q8.0.2	The applicant	**Water Framework Directive (WFD) assessment figures** The WFD assessment [APP-171] presents two figures for Plate 12-3 which are both described as showing minimum groundwater depth; however, the two figures show different depth information; it is therefore not clear which figure represents the minimum depth to groundwater below ground level. Could the applicant clarify what the two figures are attempting to demonstrate and how they relate to statements made in row 1 of table 12-4 of the WFD assessment relating to interaction of the piling for Works Nos. 2 to 4 and groundwater body quantitative status?
Q8.0.3	Environment Agency (EA)	**Water Framework Directive assessment for groundwater bodies** In reference to paragraphs 5.16.2 and 5.16.14 of NPS EN-1, could the EA confirm whether it agrees with the conclusions of the WFD assessment [APP-171]? In particular, the ExA seeks confirmation as to whether comments made in the EA's RR [AS-062] regards the adequacy of the applicant's characterisation of groundwater levels and flow direction within Chapter 12 of the ES would have implications for the findings of the WFD assessment for groundwater bodies.
Q8.0.4	Environment Agency	**Flood Risk Assessment (FRA)** The ExA notes that BDC's RR [RR-011] defers to NCC and EA on matters of water resources and flood risk. Regarding the updated ES Appendix 12.2: Flood Risk Assessment [AS-053], does the EA agree with the conclusions in Section 12.6 and the rationale for the section on the sequential test, application of the sequential approach and the exception test (paragraphs 12.2.44 to 12.2.55)?
Q8.0.5	The applicant	**Norfolk County Council Lead Local Flood Authority (LLFA) Comments** During the Issue Specific Hearing 1, the applicant proposed a meeting with the LLFA prior to deadline 1 to discuss the LLFA's concerns with several aspects of the FRA submitted with the application [APP-170]. These concerns are set out at length in Appendix 1 to NCC's RR [RR-043]. Following the above meeting, could the applicant confirm whether they intend to submit an updated FRA to address the concerns?
Q8.0.6	The applicant	**Sequential approach to site layout** Bullet 3 of paragraph 5.8.36 of NPS EN-1 requires the SoS to be satisfied that a sequential approach has been applied at the site level to minimise flood risk by directing the most vulnerable uses to areas of lowest flood risk. The FRA [AS-053] identifies that the full extent of more vulnerable elements of Works Nos. 2 to 4 are partly located in surface water flow paths modelled by the applicant. At the Issue Specific Hearing 1, the applicant advised that the detailed design of the proposed development is likely to avoid the surface water flow paths.

ExQ1	Question to:	Question:
		Given that the detailed design is yet to be developed, could the applicant explain the approach that would be taken in the event that the detailed design process cannot avoid the modelled surface water flow paths, by: (i) providing clarity on why Work Nos 2 to 4 need to be located here to ensure policy in NPS EN-1 is satisfied (ii) identify how the identified surface water flow paths would be mitigated if they cannot be avoided
Q8.0.7	The applicant	**BESS unit flood risk** The FRA [AS-053] states two different minimum heights above ground level for the BESS units. For pluvial flood risk at paragraph 12.2.20, a minimum clearance of 0.1m between ground level and the BESS units is stated, whereas for groundwater flood risk, paragraph 12.2.42 states BESS units will be elevated by at least 0.3m above ground level. In its RR [RR-043], the LLFA state that their developer guidance requires a clearance of 0.15m. In reference to compliance with bullet 12 of paragraph 5.8.15 of NPS EN-1, could the applicant: (i) confirm the proposed minimum clearance above ground level of the BESS units (ii) comment on how the minimum clearance has been aligned to the LLFA's guidance (iii) confirm how commitment to this minimum clearance will be secured and comment on whether it could be included in the Design Principles, Parameters and Commitments document [APP-048] which is currently referenced in Schedule 13 of the dDCO [APP-018] as a document to be certified?
Q8.0.8	The applicant	**Maintenance of surface water drainage system** Paragraph 5.8.39 of NPS EN-1 states that the SoS should be satisfied that the most appropriate body is given responsibility for maintaining sustainable drainage systems (SuDS). The FRA [AS-053] describes that the proposed storage tank and infiltration basin for Work No.s 2 to 4 would capture runoff from both temporary aspects of the proposed development (the BESS) and permanent aspects (the NGET substation); these aspects would have different operators during the project lifetime. However, paragraph 12.4.31 of the FRA [AS-053] only states that the "Scheme operator" will be given SuDS maintenance responsibility. Could the applicant please clarify who will have the long term maintenance responsibility for the proposed storage tank and infiltration basins which jointly serve Work Nos. 2 to 4 and how this would be secured within the dDCO?
Q8.0.9	The applicant	**Flood Risk Activity Permit (FRAP)** Part 1 of dDCO, Article 6 (1) (e) provides for the disapplication of the requirement for the applicant to obtain a flood risk activity permit (FRAP) from the EA; however, the updated Flood Risk Assessment (FRA) [AS-053] does not indicate whether a FRAP may be required from the EA. In its relevant representation [AS-062] the EA state no discussions have taken place between the EA and the applicant regarding FRAPs or disapplication. To justify why the relevant part of the Environmental Permitting Regulations need to be disapplied and protective provisions agreed, could the applicant clearly explain where a FRAP is likely to be required particularly given the distance to the nearest main river?
Q8.0.10	The applicant	**Ordinary Watercourse land drainage consent disapplication** The OEMP [APP-188] states that works would ordinarily require Land Drainage Consents from the Lead Local Flood Authority (LLFA), and that it is intended that these requirements would be disapplied through the DCO. Could the applicant: (i) provide an update on progress with the LLFA in relation to legislative requirements proposed to be disapplied and included in the dDCO, as set out in Appendix 1 of the Consents and Agreements Position Statement [APP-185]? (ii) provide confirmation on whether land drainage consent may be required with the Norfolk Rivers Internal Drainage Board (IDB) or the East of the Ouse Polver and Nar IDB and whether discussions have been held with either IDB regards this requirement?
Q8.0.11	The applicant	**Hydrogeological Model and Assessment of Impacts** In appendix C of its RR [AS-062], the EA has provided comments on the outline Battery Safety Management Plan (oBSMP) [APP-194] which shows that for groundwater protection, the method and assumptions, results of assessment and mitigation / enhancements have not been agreed.

ExQ1	Question to:	Question:
		Could the applicant comment on these concerns and provide an update on progress.
Q8.0.12	The applicant	**Water Resource Assessment** Paragraph 12.8.99 of ES Chapter 12: Water Resources [APP-061] states that the proposed development is likely to be supplied, at least in part, by Anglian Water mains supply. To demonstrate compliance with paragraph 5.16.10 in NPS EN-1 and as requested in Anglian Water's RR [RR-003], could the applicant provide a Water Resource Assessment?
Q8.0.13	The applicant	**Options for all watercourse crossings and trenchless excavation activity** Could the Applicant clarify whether they have assessed the other options for all watercourse crossings and trenchless excavation activity apart from the use of Horizontal Directional Drilling (HDD) including the impacts from these options and any necessary mitigation or whether they have assessed and set out mitigation measures only for the potential use of HDD as set out in the oCEMP [APP-186].
9.	**Grid Connection**	
Q9.0.1	The applicant	**Scenario B (double turn in option)** ES Chapter 8 [APP-057] Paragraph 8.8.30 describes that: *"For completeness, an assessment has been presented in this chapter which covers the removal of the decommissioned pylons and overhead line (Scenario B). The ultimate conclusions, though, are as assessed from Scenario A, as the worst-case assessment."* (i) Could the applicant advise if discussions have been held with National Grid Electricity Transmission (NGET) plc to explore whether it agrees with the applicant's preferred solution of Scenario B (double turn in option) as stated in paragraph 8.8.30, ES Chapter 8? (ii) Can this topic be included in the Statement of Common Ground with NGET? (iii) Can the applicant comment on whether Scenario B has also been considered in other ES Chapters, in particular ES Chapter 6: Landscape and Visual [APP-055] and if so what changes in effects resulted? (iv) Could a drawing, showing plan views and elevations for Scenarios A and B be provided?
Q9.0.2	The applicant	**Potential new connections to the proposed substation** Table 7.1, Statement of Need [APP-042], presents National Energy System Operator's (NESO) Transmission Entry Capacity (TEC) Register entries for connection within 25km of New Swaffham. (i) Could the applicant confirm details of any other schemes that are proposed to connect to the proposed development's new Swaffham substation and confirm whether these have been included in the cumulative effects assessment in the ES? (ii) In relation to the proposed development, where is it envisaged that any such connections would take place and in particular is there any interaction with the proposed connection for High Grove Solar Farm?
Q9.0.3	National Grid	**Potential implications for delivery for scenarios during examination and Post-Consent** With reference to additional submission [AS-063], could National Grid comment on whether it agrees with the potential implications for delivery for the two scenarios (During examination and Post-Consent) that the applicant has set out if National Grid decide it would prefer to site its substation elsewhere?
10.	**Land and Soil**	
Q10.0.1	The applicant	**NPS EN-1, Best and Most Versatile Agricultural Land** The use of best and most versatile (BMV) agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification (ALC)) has been raised as a concern by CAPC [RR-013], NCC [RR-043], NE [RR-038] and Terry Jermy MP [RR-058], and numerous other IPs [too many to list]. The ExA notes that the applicant has set out its assessment of compliance with NPS EN-1 in its Policy Compliance Document [APP-044] and that R20, dDCO [APP-018] refers to a 60 year operational life for the proposed development.

ExQ1	Question to:	Question:
		Both before and after the applicant's Agricultural Land Classification, with reference to NPS EN-1 paragraph 5.11.12, could the applicant explain how it has aimed to minimise impacts on the BMV agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification ALC) and preferably use land in areas of poorer quality (grades 3b, 4 and 5). Can the applicant also comment in relation to the proposed NGET substation which would result in the permanent loss of Grade 2 land.
Q10.0.2	The applicant	**ALC survey extent** The ALC survey [APP-168] does not include all of the Grid Connection Infrastructure area within the Order limits on the east side of the A1065. It is not made clear in the ES why these areas have not been included in the ALC survey. Can the Applicant explain in more detail why the Grid Connection Infrastructure has not been included in the ALC survey?
Q10.0.3	The applicant	**Contaminated Land desk study** Can the Applicant clarify whether a Phase 1 Contaminated Land desk study has been undertaken for the proposed development to establish baseline conditions. If not, explain why and provide more detail on what assumptions have been made regarding the baseline with respect to contaminated land for the assessment.
Q10.0.4	The applicant	**Natural England's RR [RR-038]** Table 11.4 of ES Chapter 11 indicates that BMV agricultural land represents approximately 54% of the total Order limits area, with 38 hectares (ha) potentially being disturbed, and potentially 8.8 ha being permanently lost. Natural England (NE) in their RR [RR-038] advise that the ES should identify the sensitivity of affected soils using ALC and soil-function criteria, ensure that the full spatial extent of BESS-related land disturbance is accounted for, and commit to fully specified mitigation and monitoring measures within the final Soil Management Plan (SMP) to support a defensible evaluation of significance. Can the Applicant respond to NE's RR on this matter and explain whether the ES assessment of BMV land and soils handling is robust enough to reach the conclusions in the ES or if further assessment is required as advised by NE.
Q10.0.5	The applicant	**Indicative BESS footprint - distribution of BMV land** The distribution of BMV land (Grades 2, 3a and 3b) within the indicative BESS footprint has not been specifically assessed as the exact location has not yet been decided for the proposed development. The assessment in the ES assumes that adverse effects would be temporary and reversible through restoration, although unsuccessful reinstatement could result in permanent downgrading of land quality. Can the Applicant clarify whether soil handling and works would permanently affect the ALC of any BMV land that is required for the proposed development's BESS and the Substations respectively.
Q10.0.6	The applicant	**BMV Land Percentage of the Site** With reference to Policy Compliance Document [APP-044], in its assessment of compliance with NPS EN-3 paragraph 2.10.29, the applicant concludes that 48.3% of the Site is non-BMV and 51.7% of the Site is BMV. Could the applicant explain the reasons why the above percentages are inconsistent with the percentages presented in Table 11-4 ALC Survey Results of the Site [APP-060] which correspond with 54% of the Site is BMV with the remainder Non-BMV, Non-agricultural and woodland, and not surveyed and roads.
Q10.0.7	The applicant	**Alternative agricultural use during the operational phase** ES Chapter 14: Socio Economics [APP-063] paragraph 14.8.40 concludes that alternative agricultural use, such as sheep grazing and fodder production, could continue under and around the solar panels. Section 2.15 of the outline Operational Environmental Management Plan (oOEMP) [APP-188] assumes as a reasonable worst case there would be no grazing but that sheep grazing would be explored should consent be granted. (i) Could the applicant provide examples of solar farms where alternative uses such as sheep grazing and fodder production, have been implemented during the operational phase? (ii) Also, could the applicant indicate whether any additional measures would be required for the proposed development as a result and how these would be secured?
Q10.0.8	The applicant	**Land use after decommissioning of the proposed development** The final version of the oDS [APP-190] is secured via R20 of the dDCO [APP-018]. Paragraph 2.1.2 of the oDS includes that when the operation phase ends, the Solar PV Site would be decommissioned and the land returned to the landowner. Following decommissioning, should the oDS also set out what happens to the land in the event that Compulsory Acquisition powers would be used?
Q10.0.9	Breckland District Council	**Decommissioning of underground cables**

ExQ1	Question to:	Question:
	Norfolk County Council	Policy Compliance Document [APP-044] refers to paragraph 2.10.68 of NPS EN-3 stating that the nature and extent of decommissioning of a site can vary and generally it is expected that underground cabling will be dug out to ensure that prior use of the site can continue. In relation to the decommissioning of underground cables, the outline Decommissioning Strategy [APP-190] states that currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. (i) Do the parties have any comments on the applicant's suggested approach and whether it strikes an appropriate balance between the potential magnitude and duration of impacts during decommissioning and the longer-term implications for future site use? (ii) Should the oDS [APP-190] require the underground cables and ducting to be removed?
Q10.0.10	The applicant	**Cumulative effects during decommissioning phase** Table 18-3 [APP-067] presents that there is a residual moderate adverse significant cumulative effect during the decommissioning phase due to the permanent land loss of BMV quality from all the developments to exceed 20 ha. Table 11-7, ES Chapter 11 [APP-060] provides a breakdown of the areas disturbed by ALC Grade for the proposed development. Could a breakdown of the areas disturbed by ALC Grade and a total area be provided for all the developments assessed in the cumulative effects assessment?
11.	**Landscape and Visual**	
Q11.0.1	The applicant	**Vegetation Removal Plan** Appendix 2 – Vegetation Removal Plan, oLEMP [APP-191], shows both the Order limits and hedgerow removal as red lines. Could the applicant review if the hedgerow removal demarcation shown is sufficiently clear to avoid potential confusion with hedgerows situated on the Order limits?
Q11.0.2	The applicant	**Advance planting and associated temporary hoarding** Consultation Report [APP-025], Table 23 states: "Indicative area for solar PV panels (including glint and glare) – 'Justification for the scale of the development is set out in the Statement of Need [APP/5.4]. Provided that solar PV panels are not installed until advance planting has become established, no significant glint and glare impacts are anticipated." oCEMP [APP-186], Table 11, states for Glint and Glare effects that *"Temporary hoarding is to be erected on the A1065 in the areas shown on ES Figure 5.2: Construction Masterplan [APP/6.3], until the advanced planting (detailed in the oLEMP [APP/7.11] reaches 3m in height in these areas)."* (i) Since the DCO application was submitted, has the advance planting progressed and if so what further planting remains? (ii) How long is it envisaged that the temporary hoarding would need to be in place? (iii) What would be the appearance of the hoarding and how would the details be submitted for approval be secured in the dDCO? (iv) Could ES Figure 5.2: Construction Masterplan [APP-077] be updated to show the extent of the temporary hoarding as referred to above in Table 11?
Q11.0.3	The applicant	**Permanent area for Green Infrastructure and National Grid substation left after decommissioning** ES Figure 5.1: Concept Masterplan [APP-076] shows the indicative siting zone for National Grid substation in the northern part of field 27. The oLEMP [APP-191], Appendix 1, Key Plan, Green Infrastructure Strategy Plans, shows a permanent area for Green Infrastructure and National Grid substation left after decommissioning, in yellow outline. Could the applicant clarify if the extent of the yellow outline is shown correctly as it is shown on 3 sides of the southern part of field 27.
Q11.0.4	The applicant	**Impact on dark skies policies** CAPC's RR [RR-013] includes concerns that: *"Castle Acre Parish Council has adopted a Dark Skies Policy in line with national and county guidance. NPPF Section 15 Paragraph 198 and Norfolk County Councils Environmental Lighting Zones Policy. The impact of operational and security lighting from the proposed solar farm, regardless of mitigation, is an additional concern, adversely affecting the quality of our night skies and their value to nocturnal wildlife."* Could the applicant comment on this concern.
Q11.0.5	The applicant	**Glint and Glare Assessment** BDC's RR [RR-011] raises concerns regarding Glint and Glare in particular:

ExQ1	Question to:	Question:
		(i) paragraph 4.2, notes that BDC considers a site survey is necessary to ensure that the reported findings are sufficiently robust to withstand the scrutiny of examination; (ii) paragraph 4.4 notes that it is not considered that the concern in paragraph 4.3 (regarding cumulative impacts) has been addressed by the applicant within the DCO submission; and (iii) paragraph 4.6 notes that the applicant does not consider a complaints procedure to be necessary, however, the Council disagrees in this regard and requests such a procedure is secured via the DCO in the event consent is granted. Could the applicant comment on each of the above points.
Q11.0.6	The applicant	**Photovoltaic Panel Mounting Structures** Regarding the photovoltaic panel mounting structures, paragraph 5.3.8 of the ES Chapter 5 [APP-054], confirms that the option A - Single Axis trackers (which are 4.5m high) has been used in the environmental impact assessment as a worst case scenario. What change in landscape and visual effects would be result if Option B - 3.5m high fixed south facing arrays were used instead?
Q11.0.7	Sporle with Palgrave Parish Council	**Unaccompanied site inspection request by Sporle with Palgrave Parish Council** With reference to [PDA-004], could Sporle with Palgrave Parish Council's clarify its suggested locations (as noted below) from its plan on page 2 for an unaccompanied site inspection. The locations listed in the first plan are: • Peddar's Way from the A1065 to Great Palgrave including viewpoint 8 • public right of way from Palgrave Hall to A1065 (includes locations L2 to L7 inclusive) and L1 on Fincham Drove. • VP4 & VP6 are shown but these don't align with the locations in Figure 6.7 [APP-084] – please clarify locations The locations listed in the second plan are: • Viewpoints 1, 7, 8, 12, 13, 14 and 15 • Please clarify if annotations N1, N2, N3 and View 7 represent specific locations and if so provide more detail on their precise locations.
12.	**Need, site selection and alternatives**	
Q12.0.1	The applicant	**Generating capacity** Table 13-29, ES Chapter 13 [APP-062] states the predicted energy capacity (MWh) is 37,220,144. (i) Please clarify how this relates to paragraph 3.10.41 of NPS EN-3, which states that total capacity of a solar farm can be measured either in terms of the combined capacity of installed solar panels (measured in direct current) or in terms of combined capacity of installed inverters (measured in alternating current)? (ii) Is this the quantity of electricity generation that the ExA should consider for the planning balance?
Q12.0.2	The applicant	**Statement of Need, Overplanting** Paragraph 6.6.1, Statement of Need [APP-042] states: *"The ratio of overplanting considered at this scheme lies within the ranges described in this section and the impacts of the Scheme have been assessed including the overplanted capacity."* Could the applicant confirm the ratio of overplanting used for assessing the impacts on the proposed development?
Q12.0.3	The applicant	**Underground alternative for the proposed diversion of the existing dual circuit 400kV overhead line (OHL) into the new National Grid Substation** NCC's RR [RR-043] expresses its disappointment that the application does not include an underground alternative for the proposed diversion of the existing dual circuit 400kV overhead line (OHL) into the new National Grid Substation, as it had requested in response to the PIER statutory consultation. (i) Could the applicant provide more detail than is included in ES Chapter 4 [APP-053], paragraph 4.3.8, on why this underground alternative hasn't been explored as an option in the application. (ii) Regarding this underground alternative, could the applicant provide further evidence to demonstrate how it considers it has complied with the requirements of: NPS EN-1 in relation to the mitigation hierarchy; and NPS EN-5, paragraph 2.9.14, regarding due consideration to the costs and benefits of feasible alternatives to the overhead line.
Q12.0.4	The applicant	**Details of the BESS** The Grid Connection Statement [APP-181] states that:

ExQ1	Question to:	Question:
		"The Grid Connection Agreement allows the Applicant to export the electricity produced at the Scheme up to 500 MW (AC) through the new National Grid Substation known as the New Swaffham 400kV Substation. It also allows for the import of up to 500 MW (AC) of electrical energy to be stored in an Energy Storage Facility (for the purposes of the DCO Application, this is assumed to employ battery technology and is therefore referred to as a 'Battery Energy Storage System' or 'BESS' throughout this DCO Application) located on the Site to be exported at a different time, back to the NETS." Explain the justification for the proposed BESS having a capacity that would be the same as the grid connection limit. In answering this question, the applicant should: (i) Confirm the BESS storage capacity and duration of storage (rated in megawatt hours). (ii) Identify typically how long it would take to fully charge and fully discharge the proposed BESS. (iii) Comment on whether the generating station (solar arrays) element of the proposed development would or would not be financially viable without a BESS. (iv) If the answer to part (iii) of this question is no, identify the minimum capacity for a BESS that would be needed to render the generating station element of the proposed development viable. (v) In the case of the minimum capacity for a BESS, what would be the impact on the ES in terms of the significant effects. (vi) Comment on whether the BESS of the scale proposed within the submitted application would or would not accord with the principles for associated development set out in paragraph 5 of the 'Guidance on associated development applications for major infrastructure projects' (Department for Communities and Local Government, April 2013). (vii) In terms of the operational revenue expected to be earned by the proposed development identify the proportion (percentage) arising from: the generation of electricity on-site, inclusive of any of that electricity that would be stored in the BESS prior to it being exported to the national transmission system; and the importation and exportation of electricity generated by a generating station other than that forming part of the proposed development.
Q12.0.5	The applicant	**Alternatives including brownfield land, lower-grade agricultural land, rooftop solar, or dispersed schemes** An IP [RR-062] raises concerns that "No evidence is provided that equivalent or greater generating capacity could not be delivered through less harmful alternatives, including brownfield land, lower-grade agricultural land, rooftop solar, or dispersed schemes". NPS EN-3 paragraph 3.10.14 refers to, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Could the applicant comment on the above concern and explain why it is necessary to site the proposed development on agricultural land?
13.	**Noise and Vibration**	
Q13.0.1	Breckland District Council	**Noise and Vibration Assessment** Further to the comments regarding noise in its RR [RR-011] BDC is asked to please state whether it agrees with the assessment methodology set out in ES Chapter 10 Noise and Vibration [APP-059]. If not, please explain where you disagree and why. Where applicable please cross refer to relevant submissions.
Q13.0.2	The applicant	**High Grove Solar Farm additional mitigation** Section 10.11, ES Chapter 10 [APP-059] identifies that the cumulative effects would not be significant for all phases, providing that the proposed High Grove Solar Farm reduces noise effects at 'The Off Barn' (a high-sensitive receptor) during the operational phase by additional mitigation. (i) Could the applicant provide an update on what additional mitigation is proposed by High Grove Solar Farm and how this would be secured? (ii) Could the applicant comment on BDC's RR [RR-011] which states in paragraph 4.12 regarding 'The Off Barn' during the daytime that *"As such, it is considered that the onus should be on Drove Solar to achieve 35dBA".*
Q13.0.3	The applicant Norfolk County Council National Highways Breckland District Council	**Equality Impact Assessment – Noise and Vibration effects at The Splashes Campsite (Traveller Site)** Paragraph 7.4.10 of the Equality Impact Assessment (EqIA) [APP-182] determines that in relation to the noise and vibration effects at The Splashes Campsite (Traveller Site), no additional equality specific measure is appropriate or required. (i) Could the applicant provide more detail on the assumption regarding the *"very short duration of works*" quoted in paragraph 7.4.8, EqIA? (ii) How would the applicant secure the specific restrictions in the dDCO, as identified in paragraph 7.4.7, EqIA, ie these activities would be temporary, of short duration, and confined to normal working hours, with no evening or night-time activity expected?

ExQ1	Question to:	Question:
		(iii) Could the Highway Authorities and BDC confirm if they are in agreement with the applicant's view that a detailed noise assessment is not required for the reasons given in paragraph 7.4.8, EqIA?
Q13.0.4	The applicant	**Improvements to Health and Quality of life** Paragraph 5.12.17 of NPS EN-1 requires that proposals, where possible, contribute to improvements to health and quality of the life through the effective management and control of noise. The applicant is asked to please explain: (i) How the proposed development does this, cross referencing where necessary to existing documents. (ii) If it has not been possible for the proposed development to achieve this, then please explain why not.
Q13.0.5	The applicant	**Noise Pollution – impact on quality of life** CAPC [RR-013] raise concerns about operational noise, particularly the substation and the battery storage inverters and fans, and construction noise from piling, infrastructure installation and construction traffic on local roads. CAPC is concerned that construction noise in this rural and tranquil landscape will all be intrusive, constantly affecting the quality of life for residents and all those using the Public Rights of Way and Footpaths on or near the solar installations as well as being damaging to local wildlife. Could the applicant comment on this concern.
14.	**Population**	
Q14.0.1	Breckland District Council	**Outline employment, skills and supply chain strategy** The ExA notes NCC's comments in relation to Socio-Economic in its RR [RR-043]. Could BDC confirm if it is content with, or has any comments on, the Outline employment, skills and supply chain strategy [APP-195]?
Q14.0.2	The applicant	**Effects on land uses** ES Chapter 14: Socio-Economics [APP-063], Table 14.16 concludes that the residual effects for effects on land uses are not significant for the construction, operational and decommissioning phases. The description of the impact states: *"The Scheme will result in the loss of some agricultural activity. However, it is anticipated that alternative income and some of the agriculture practices, would help to offset some of the losses experienced by affected farmers."* Could the applicant clarify, in assessing the effects on land uses, what assumptions have been made above for offsetting some of the losses and whether its assessment complies with EN-1 NPS 4.2.12 in assessing the likely worst case for economic effects.
Q14.0.3	The applicant	**Recreational enhancements** ES Chapter 14: Socio-Economics [APP-063], paragraph 14.7.4 lists the following embedded mitigation measure: *"Recreational enhancements such as interpretation boards and the potential for new publicly accessible amenity space within the north-western site area, that is connected to the existing PRoW* (Public Right of Way*) network".* Appendix 1– Green Infrastructure Strategy Plans, oLEMP [APP-191] shows the potential locations for interpretation boards and a publicly accessible amenity space and interpretation boards (to be provided by others). Could the applicant confirm what further steps are proposed to confirm the provision and locations of the proposed boards and the amenity space?
Q14.0.4	The applicant Norfolk County Council Breckland District Council	**Proposed new permissive routes** ES Chapter 14: Socio-Economics [APP-063], paragraph 14.7.4 includes that *"In addition to this, a number of new permissive routes are proposed, of approximately 4.7km in total, which would link to the existing PRoW network within the study area to provide recreational benefits. This total number can be broken down to approximately 1.2km new offsite permissive route provision and approximately 3.5km new onsite permissive route provision (as will be secured within the outline Operational Environmental Management Plan (oOEMP) [APP/7.8] submitted as a requirement of the DCO Application."* (i) Could the applicant provide further details of the 1.2km of offsite permissive route provision to include how this would be secured? (ii) Could the Councils confirm if they are content with the proposed new permissive routes?

ExQ1	Question to:	Question:
Q14.0.5	The applicant	**Cumulative effects** Regarding cumulative effects, ES Chapter 14: Socio-Economics [APP-063], paragraph 14.11.14 states: "*Given High Grove Solar Farm and East Pye are not likely to coincide with construction of the Scheme as their construction phases are expected to be completed before the Scheme commences, the cumulative impact is considered to be low in magnitude. Given the medium sensitivity of the receptor, the cumulative effect is therefore assessed as direct, temporary, Minor Beneficial effect that is considered not significant.*" Could the applicant clarify what assumptions have been used regarding the construction phases for High Grove Solar Farm, East Pye and the proposed development?
Q14.0.6	The applicant	**Effects on The Peddars Way and the Nar Valley Way** CAPC [RR-013] includes concerns that The Peddars Way (a National Trail) and the Nar Valley Way would be significantly affected by the proposed development impacting the experience of users and that the proposed development would conflict with national planning objectives to promote access to high-quality landscapes and protect valued recreational assets (Refer, NPPF Section 6 "Supporting a prosperous rural economy" of tourist importance). Could the applicant comment on this concern.
Q14.0.7	The applicant	**Health concerns** An IP [RR-053] also raised concern that: *"World health authority suggests no one should live within 2 km of a solar factory. This is not the case at The Droves or High Grove sites with parts of Swaffham, Castle Acre, South Acre etc etc being within this guidelines. Why doesn't anyone care?"* Could the applicant comment on the above concern with reference to the above guidelines?
Q14.0.8	The applicant	**Electromagnetic Field well-being concerns** ES Chapter 15 [APP-064], paragraph 15.5.9 includes that: "*The applicant will provide clear information to the public on EMF* *levels and compliance through the Community Liaison Group (see the outline Construction Environmental Management Plan (oCEMP) [APP7.6], outline Operational Environmental Management Plan (oOEMP) [APP/7.8], and outline Decommissioning Strategy (oDS) [APP/7.10]."* Could the applicant provide specific references for the above commitment in the three plans described above?
Q14.0.9	The applicant	**Pre-existing Health Conditions** Can the Applicant explain how the approach in ES Chapter 15: Human Health [APP-064] addresses the potential for effects on pre-existing health conditions and if this has a bearing on the EqIA [APP-182].
Q14.0.10	The applicant	**Engagement with NCC Public Health, NHS – Norfolk and Waveney Integrated Care System and UK Health Security Agency** The ExA notes the comments on Health and Wellbeing in NCC's RR [RR-043]. Could the Applicant please summarise engagement with NCC Public Health, NHS – Norfolk and Waveney Integrated Care System and UK Health Security Agency to understand the Health and Wellbeing impacts the proposed development will have on the surrounding areas over its lifetime.
Q14.0.11	The applicant	**Design considerations resulting from the location of existing utilities** The dDCO [APP-018] includes protective provisions for Exolum pipeline systems. No details are shown for the Exolum pipeline system on ES Figure 16.1 Utilities Plan [APP-131]. Anglian Water raises concern in its RR [RR-003] that this figure does not show the two Anglian Water water mains along the A1065 corridor which are within the proposed Order Limits for the Off-Site Highway Works to A1065/A47 Fakenham Road interchange. (i) Could the applicant provide further details of the location of the Exolum pipeline system? (ii) Could the applicant advise whether there are any specific safety considerations for the design or layout of the proposed development that have been made as a result of the location of existing utilities, including pipelines? (iii) Could the applicant confirm whether the oBSMP [APP-194] takes account of the location and associated potential risks from existing utilities, including pipelines?
Q14.0.12	The applicant	**Potential chemical leaks from batteries or a fire** An IP [RR-008] cites concern that a chalkstream could be polluted if there is a chemical leak from Batteries or a fire. Could the applicant explain how this risk has been assessed, what mitigation measures are proposed and how they would be secured in the dDCO?
Q14.0.13	The applicant	**Outline Battery Safety Management Plan**

ExQ1	Question to:	Question:
		Could the applicant set out: (i) How is the applicant proposing to engage with Norfolk Fire and Rescue services during construction, operation and decommissioning phases in relation to the detailed Battery Safety Management Plan? (ii) How would the detailed Battery Safety Management Plan be secured in the DCO? (iii) Can the applicant provide a draft of the Emergency Response Plan referred to in the oBSMP [APP-194] during the examination? (iv) Can the applicant consider whether the requirement for an Emergency Response Plan should be set out in Requirement (R) 6 of the dDCO?
Q14.0.14	Breckland District Council The applicant	**Outline Battery Safety Management Plan** The ExA notes that: • NCC has provided Norfolk Fire and Rescue Service's comments in item (x) and Appendix 2 of its RR [RR-043]. • The EA has provided comments on the oBSMP [APP-194] in its RR [RR-021] which includes that the oBSMP is not agreed for surface water quality or ground water protection. (i) Could BDC confirm if they are content with the oBSMP [APP-194] or if they have any outstanding concerns? (ii) Could the applicant provide an update on progress with the agreement of the oBSMP with NCC (including Norfolk Fire and Rescue Service) and the EA.
Q14.0.15	The applicant	**Major Accidents & Disasters** Regarding Major Accidents and Disasters (MA&D), with reference to Section 3.14, ES Appendix 2.2 Scoping Opinion Response [APP-134], could the applicant provide a summary of which ES Chapters it has considered are relevant for the potential impacts from MA&D on sensitive receptors and has therefore assessed.
15.	**Transport and access**	
Q15.0.1	The applicant	**Transport Assessment Methodology and Mitigation** The ExA notes that NCC and National Highways (NH) have provided their comments relating to Traffic and Transport in RR [RR-043] and RR [RR-037] respectively. As requested by NH, could the applicant provide: (i) an additional explanation concerning the expected impact on the A47 Junctions, including the A47/A1065 and A47/Narborough Road during the peak hours to confirm if further assessment (modelling) is required. (ii) further detail concerning the monitoring regime in the oCEMP [APP-186], consistent with other consented DCOs. (iii) more detail in the oCEMP and the outline Construction Traffic Management Plan (oCTMP)[APP-187] in respect of control measures and enforcement, particularly regarding timescales for corrective measures to be implemented.
Q15.0.2	The applicant	**Abnormal Indivisible Loads** The ExA notes that NH's concern in its RR [RR-037] that the applicant has yet to undertake a Road Safety Audit for the minor works required on the junction of the A47/A1065 to accommodate the Abnormal Indivisible Load (AIL) movements. Regarding the above concern, could the applicant provide an update on whether a Road Safety Audit has now been completed for these proposed works and if so whether any highway safety issues were identified.
Q15.0.3	The applicant	**Construction vehicle routing** Section 4 of the oCTMP [APP-187] describes the construction vehicle routing. (i) Given that the routing also forms an important assumption for the assessment of noise and air quality from construction traffic, could the applicant provide more detail on how the vehicle tracking and identification proposed in Section 5.7 [APP-187] would be implemented to ensure compliance with the proposed routing? (ii) NCC in paragraph 4.39 of its RR [RR-043] notes that LGVs should not be using Route C. Could the applicant comment on this request.
Q15.0.4	The applicant	**Stage 1 Road Safety Audit** The oCTMP [APP-187], paragraph 2.3.4, states that: "*A Stage 1 Road Safety Audit (RSA) has also been undertaken of the access proposals that is included within the supporting ES Appendix 9.2: Traffic Assessment [APP-163], which identified no residual highway safety concerns.*"

ExQ1	Question to:	Question:
		ES Appendix 9.2: Traffic Assessment [APP-163], paragraph 3.4.3 which provides a summary of the key points raised within the Road Safety Audit and Designer's Response includes that: • the need to maintain the visibility splays will be secured through the DCO; and • the Applicant confirms that the internal haul roads will be suitable to accommodate the expected vehicles, details of which would be secured through the detailed design of the Scheme. Could the applicant provide more detail on how the two points above would be secured in the dDCO with reference to the relevant requirements and plans?
Q15.0.5	The applicant	**Potential increase in deer vehicle collisions** The Forestry Commission's RR [RR-022] states *"Large scale fencing will change how deer move through the landscape, which may also increase the numbers of deer crossing local roads, including the A1065 and therefore may increase the numbers of deer vehicle collisions in the area. If culls occur prior to development, the risks should reduce."* In light of the above concern regarding deer vehicle collision risks, could the applicant review the Road Safety Audit and provide an update on how this risk would be addressed.
Q15.0.6	Norfolk County Council	**Cumulative traffic using the A1065** Regarding cumulative traffic for other NSIPs using the A1065, with reference to ES Appendix 9.1 [APP-162], Table 9-21 (page 6), the applicant signposts that the future baseline is discussed within Section 9.6 and the approach to cumulative assessment within Section 9.11 of ES Chapter 9: Transport and Access [APP/6.2] [APP-058]. Could NCC advise whether it agrees with the applicant's future baseline and approach to cumulative assessment as referenced above?
16.	**Other Planning Matters**	
Q16.0.1	The applicant	**Strategic mitigation for air pollution** ES Chapter 16 [APP-065], paragraph 16.4.1 refers to: *" In Section 3.5 of ES Appendix 2.2: Scoping Opinion [APP/6.4], PINS confirmed that air quality effects are not likely to be significant, on the basis that the following information is provided in the ES."* This included: *"Ensure strategic mitigation for air pollution is taken into account throughout the design".* Could the applicant confirm how it has ensured strategic mitigation for air pollution is taken into account throughout the design (to include reference to specific documents)?
Q16.0.2	The applicant	**Use of sulphur hexafluoride (SF6) in electrical equipment** As the applicant intends to use sulphur hexafluoride (SF6) in electrical equipment such as switchgear and transformers for the proposed development, can the applicant explain whether alternative technology types have been considered or provide reasoning why SF6-type equipment cannot be avoided, in line with the requirements of the NPS EN-5. If SF6-type equipment is to be used in the electrical equipment, in line with the requirements of NPS EN-5, explain in detail any plans for monitoring and control of fugitive SF6 emissions and the mechanism by which these are secured through the dDCO and/or relevant control documents.
Q16.0.3	The applicant	**Redundant fuel pipeline** Consultation Report [APP-025], Table 22, refers to: *"10 Feb '25 Meeting with MoD - 'Meeting to discuss a now redundant fuel pipeline and confirm current ownership. It was agreed that the pipeline has been decommissioned, with MOD rights relinquished, and responsibility now lies with affected landowners."* Could the applicant clarify the location of the pipeline and whether it would be affected by the proposed development?
Q16.0.4	Breckland District Council Norfolk County Council	**Mitigation for cumulative effects from waste in the decommissioning stage** Regarding waste in the decommissioning phase, paragraph 16.9.147, ES Chapter 16 Other Environmental Matters [APP-065], includes: "*Together, the cumulative magnitude of impact to hazardous waste void capacity is therefore considered to be minor. Due to the receptor's very high sensitivity, the effect is a cumulative moderate or large adverse effect, which is considered significant."*

ExQ1	Question to:	Question:
		Additional mitigation described in paragraph 16.9.148 [APP-065] includes: *"The Decommissioning Waste Management Strategy must ensure that hazardous waste handling capabilities are assessed based on up-to-date information at the time of drafting prior to decommissioning works being undertaken. Where significant cumulative effects on hazardous waste handling facilities from decommissioning of multiple NSIPs are assessed as likely to occur, a coordinated approach between site operators of those relevant NSIPs should be secured ahead of the commencement of decommissioning activities."* The mitigation / enhancement measures and monitoring requirements, described for Waste in Table 11 Other Environmental Matters in the oDS [APP-190], would include a decommissioning waste management strategy to ensure decommissioning waste streams are sent to waste recycling and handling facilities that have sufficient capacity to handle waste arisings from the proposed development without adversely impacting upon their capacity to handle waste arisings for all other waste streams in the authority area. (i) Could BDC advise if they have any comments or concerns regarding the proposed mitigation measures for the effects from waste, particularly for the cumulative effects during the decommissioning stage? The ExA notes NCC's comments in relation to Minerals and Waste in its RR [RR-043]. (ii) Do NCC have any further comments or concerns regarding the proposed mitigation measures for the effects from waste, particularly for the cumulative effects during the decommissioning stage?