

# The Drovers Solar Farm

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## **Applicant's Response to ExQ2**

Prepared by: DWD

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# 1 Introduction

1.1.1 This document responds to the Examining Authority's (ExA) second written questions, issued on 2 July 2026 [\[PD-009\]](#). This document responds to each of the questions posed to the Applicant.

1.1.2 **Section 2** of this report is tabulated to include the ExA's questions and a response to each question as follows:

- General and Cross-topic Questions
- Aviation
- Biodiversity and Ecology (including Habitat Regulations Assessment)
- Climate Change
- Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations
- Cultural Heritage and Archaeology
- Draft Development Consent Order (DCO)
- Flood Risk, Hydrology and Water Resources
- Grid Connection
- Land and soil
- Landscape and Visual
- Need, Site Selection and Alternatives
- Population
- Transport and Access; and
- Other Planning Matters.



## 2 Topic Questions

Table 2.1: General and cross-topic questions

| ExQ           | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       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| <b>Q1.0.1</b> | The applicant | <p><b>Proposed ground levels - substations and battery energy storage system</b></p> <p>Note 7 of ES Figure 6.14 PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme Parts A, B and C [APP-103] [APP-104] [APP-105] states that:</p> <ul style="list-style-type: none"> <li>the siting and placement of both substations within field 27 takes account of a design solution that presents a reasonable worst-case scenario.</li> <li>the base of the National Grid Substation model has been modelled at 55m AOD.</li> <li>the base of the Customer Substation model has been modelled at 60.75m AOD.</li> </ul> <p>Figure 16.1 [APP-131] shows that the existing contour level at the north end of field 27 (adjacent to Bartholomew’s Hills plantation) is 45m and that this rises at the south end of field 24 to over 75m. ES Figure 5.1: Concept Masterplan [APP-076] shows that the substations and battery energy storage system (BESS) are proposed to be sited in these fields and that the Design Principles, Parameters Commitments [APP-048] states that the maximum height of the substations would be 13m to the top of the busbars (Table 3-3) and that the maximum height of the BESS would be 3.5m (Table 3-2).</p> <p>Could the applicant:</p> <ol style="list-style-type: none"> <li>Confirm what proposed ground level has been modelled for the base of the BESS.</li> <li>Describe the rationale for determining the above modelled levels for the base of the National Grid and Customer substations, and the BESS.</li> <li>Confirm how these modelled levels for the bases of the substations and the BESS would be secured as proposed ground levels in the draft Development Consent Order (dDCO).</li> <li>Confirm whether the existing ground levels would be reinstated following decommissioning of the Customer Substation and BESS, and if so how would this be secured in the dDCO.</li> <li>Confirm whether these modelled levels for the bases of the substations and the BESS have been considered consistently throughout the ES for the assessment of all topics. In particular, provide confirmation that the modelled levels for the bases have formed part of the worst-case</li> </ol> | <ol style="list-style-type: none"> <li>BESS is typically located on a development platform with a 0-3% slope, but it can be accommodated on up to a 5% slope. The Applicant acknowledges that there are varying gradients across Fields 27 and 24 and has sought flexibility for the location of the BESS to be within Field 27 and/or Field 24, as shown on the <b>Works Plan [APP/2.3.1]</b>, to account for the variance in gradient at this stage of the Scheme. The Applicant has therefore sought flexibility through the <b>Works Plan [APP/2.3.1]</b> to allow for either Solar PV Arrays or BESS to be constructed in Fields 27 and 24. Acknowledging this flexibility, and for the purposes of the landscape and visual impact assessment, the assessment has modelled the height of the Solar PV Arrays at 4.5m AGL where the BESS is located, which is 1m higher than the BESS as indicated by the dark blue shown on Sections BB, CC and DD, as a reasonable worst case scenario in <b>Appendix 1</b>. This approach would allow for up to 1m of ground reprofiling to create a development platform of suitable gradient for the BESS to be sited. Given the design stage of the Scheme, the Applicant has applied the Rochdale Envelope approach in assessing parameters for the Scheme. The Applicant does not consider it appropriate to fix ground levels or the degree of slope for the BESS platform at this stage of the Scheme’s design, as the final location, extents and detailed design layout of the BESS will influence the final ground levels. Notwithstanding this, the Applicant has shown on the drawing ‘<i>Field 24 &amp; 27 cross-sections</i>’, which is provided as <b>Appendix 1</b> to this document, a proposed ground level solution (shown via the green line) across the BESS area, which accords with the slope requirements set out at the start of this response. The Applicant is therefore confident that the BESS can be accommodated within the parameters assessed, and has updated the <b>Design Principles, Parameters and Commitments [APP/5.8.3]</b> at Deadline 3 to clarify the maximum height of the BESS will be within 4.5m of existing ground levels.</li> <li>Throughout the design process, the Applicant has sought to apply the IGP Global Design Principles and Project Principles set out within the <b>Design Approach Document [AS-009 - AS-011]</b>. The rationale for determining the above modelled levels for the National Grid Substation and the Customer Substation was influenced by Project Principles 2.2, 2.8 and 2.9, and the Applicant has sought to account for the slope within Field 27 and has allowed for a degree of ground engineering to provide flat development platforms. The Applicant has taken a pragmatic and proportionate approach to considering ground levels at this stage for the Scheme, given that the detailed design and layout is not fixed, and the Applicant has undertaken an assessment based upon the Rochdale Envelope approach. The Applicant has considered the Design Principles and has avoided the creation of a single development platform for both the Customer Substation and National Grid Substation, which (if constructed from the highest AOD point in Field 27) would increase the visibility of the Substation and would counter the Project Principles. The Applicant therefore chose AOD heights by reviewing the location of the concept design layouts for both the National Grid Substation and Customer Substation and set platform levels that sought to set the Substations within their topographical context. The Applicant notes that the final ground levels will depend on the final location, layout and design of the Customer Substation and National Grid Substation and whilst a level development platform has been considered for each of those substations for the purposes of the assessment, it is possible that a split level platform or a platform with a small degree of fall could be possible at the detailed design stage, neither of which have been modelled at this early stage. The Applicant has therefore assessed a reasonable worst case scenario and set maximum heights for these elements, which the detailed design of Scheme would be need to comply with as set out in Requirement 5 of <b>draft Development Consent Order (DCO) [APP/3.1.3]</b>.</li> </ol> <p>For the purposes of the landscape and visual assessment, the platform level for the National Grid Substation has been modelled at 55m AOD and the base level of the Customer Substation model has been modelled at 60.75m AOD, as indicated by the green line on Sections AA, BB and DD in <b>Appendix</b></p> |



| ExQ | Respondent | Question                                                                                                                                                                                                                                                                                                                                                                                                                                      | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|     |            | scenario for the flood risk assessment, landscape and visual assessment, and noise assessment.                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|     |            | vi) Annotate Figure 6.14 Parts A, B and C [APP-103] [APP-104] [APP-105] to show the extent of the proposed substations and BESS locations, together with the existing Bartholomew’s Hills plantation.                                                                                                                                                                                                                                         | <b>1</b> to this document. In order to assess a reasonable worst case scenario, the Applicant has modelled within the Parameter Wirelines to allow for +13m above the development platform (red and cyan dashed lines in <b>Appendix 1</b> to this document) or 13m above existing ground level (red and cyan solid lines in <b>Appendix 1</b> to this document) whichever is the greater. The modelled maximum parameter height is the highest of either the dashed or solid cyan and red lines as illustrated on the drawing in <b>Appendix 1</b> to this document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|     |            | vii) Provide three separate cross section drawings from west to east (from Fincham Drive at the western edge of the existing fields to the A1065), showing the modelled base levels for the National Grid substation, customer substation and the BESS, to include the existing ground levels, extent of screening from existing trees, Rochdale envelopes, proposed earthworks and the extent of the acoustic barrier.                       | iii. The Applicant has updated the <b>Design Principles, Parameters and Commitments [APP/5.8.3]</b> at Deadline 3 to secure the maximum heights of the Customer Substation at 79.0m AOD (66m + 13m) and the National Grid Substation at 73.4m AOD (60.4m + 13m) or 13m above existing ground level, whichever is the highest. This is to allow for flexibility in the detailed design of the proposed base levels and ground engineering whilst providing certainty regarding landscape and visual impact. These heights are already modelled within the Parameter Wirelines.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|     |            | viii) Provide a single cross section drawing from north to south (from the north side of Bartholomew’s Hills plantation red line boundary to the south end of field 24), showing the modelled base levels for the National Grid substation, customer substation and the BESS, to include the existing ground levels, extent of screening from existing trees, Rochdale envelopes, proposed earthworks and the extent of the acoustic barrier. | iv. Within the <b>outline Decommissioning Strategy (oDS) [APP/7.10.2]</b> the Applicant has made the following commitment: <i>“Land used temporarily will be reinstated where practicable to its pre-construction condition and use (or a condition agreed with the landowner). Hedgerows, fences, and walls (including associated earthworks and boundary features) will be reinstated to a similar style and quality to those that were removed, with landowner agreement”</i> . This commitment is also reinforced within the <b>outline Soil Management Plan (oSMP) [REP1-062]</b> at paragraph 6.1 which states that <i>“During the decommissioning phase, soils and land will be disturbed due to the removal of all infrastructure except for the National Grid Substation and Grid Connection Infrastructure, down to a depth of 1.2m from the ground level post decommissioning, accounting for any reprofiling (...)However, a detailed SMP will be needed to be in place to reflect weather, soil and land conditions, at the time of decommissioning, to ensure the Site is returned to its original use and condition as far as practicable, which will include consideration of its original topography”</i> .<br><br>v. The Applicant has set out above how the modelled levels for the BESS, Customer Substation and National Grid Substation have been considered within the ES, including in respect of the LVIA.<br><br>The noise model used to inform the assessment uses existing baseline topography, which represents worst-case predictions as the main noise source is the BESS compound which, based on the modelled topography, inclines to higher ground to the east. Where earth cuts or an elevated platform may be incorporated in the final design, the acoustic barrier (3.5m high) will be placed with the same base height as the battery units, i.e. on the same platform level, which would maintain the performance of the acoustic barrier at sensitive receptors as set out in the <b>outline Operational Environmental Management Plan (oOEMP) [APP/7.8.3]</b> , to be implemented in the detailed Construction Environmental Management Plan and secured as a DCO Requirement. Therefore, the assessment presents worst-case predictions, and should the BESS compound’s topography be modified (e.g. earth cut/levelled, or elevated platform), the acoustic barrier placed on the same ground level will likely provide better noise shielding than modelled in the assessment. The Customer Substation noise sources did not require acoustic barriers nor specific mitigation; as such, changes in height only (no change in position) due to elevated platform will have negligible changes to the predicted levels at receptors and will not change the outcome of the assessment. It should be noted that the model and assessment are based on the outline design of the Scheme and exact placement/specifications of the acoustic barriers, as well as the detailed noise levels and assessment, will be updated to reflect the final detailed design. Mitigation measures will be implemented as required to achieve equal or lower noise levels than the noise limits adopted in the assessment, which are secured as set out within Table 3.5 of <b>oOEMP [APP/7.8.3]</b> , which in turn is secured through Requirement 14 of the <b>draft DCO [APP/3.1.3]</b> .<br><br>Regarding the Flood Risk Assessment, the 2D direct rainfall modelling presented in <b>ES Appendix 12.2: Flood Risk Assessment [APP/6.4.3]</b> uses the existing ground profile and shows that the current land profile for a very minor section of Work No. 2: BESS is susceptible to a pluvial flow pathway within a topographical depression on the western extremity of that Work No. Should groundworks / enabling works for Work No. 2 level the area, this would alter the topographical profile which gives rise to the pluvial flow |



| ExQ           | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|               |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>pathway, meaning the baseline flooding scenario is unlikely to be representative of the development scenario. As the Scheme does not have a detailed design at this stage, there is a commitment in Table 3-2 of <b>Design Principles, Parameters and Commitments [APP/5.8.3]</b> to have a formal drainage system for the BESS area designed to the 1% AEP + 40% climate change allowance, with no flooding of the drainage system built into the design, as per National Standards. As such, the current pluvial flow pathway would enter the drainage system, rather than flow across or pond on the surface of Work No 2. This is secured through Requirement 11 of the <b>draft DCO [APP/3.1.3]</b>.</p> <p>The Applicant confirms that the potential for ground reprofiling has been proportionately considered throughout the ES, and appropriate controls have been included within the management plans as referenced throughout this response.</p> <ul style="list-style-type: none"> <li>vi. These have been updated and submitted at Deadline 3.</li> <li>vii. Please refer to ‘Field 24 &amp; 27 cross-sections’ in <b>Appendix 1</b> to this document.</li> <li>viii. Please refer to ‘Field 24 &amp; 27 cross-sections’ in <b>Appendix 1</b> to this document.</li> </ul> |
| <b>Q1.0.2</b> | The applicant | <p><b>Planning balance – cumulative impacts</b></p> <p>Regarding cumulative impacts, paragraph 9.4.17 of the Planning Statement [APP-043] states that it is considered that cumulative effects should be afforded neutral weight in the planning balance.</p> <p>Could the applicant provide additional detail for each component to explain further how its neutral weight is derived from consideration of the significant residual adverse impacts from Landscape and Visual, Noise and Vibration and Soils and Agriculture; and the significant residual beneficial impacts from Socio-Economics and Human Health.</p> | <p>The Applicant provides, at paragraph 9.4.15 of the <b>Planning Statement [REP1-012]</b>, a list of cumulative effects which, overall, should be afforded neutral weight in the planning balance. This recognises that the <b>ES Topic Chapters [APP/6.2]</b> conclude significant residual cumulative adverse effects on Landscape and Visual and Soils and Agriculture receptors; and significant residual cumulative beneficial effects on Socio-Economics and Human Health receptors.</p> <p>Paragraph 9.4.15 of the <b>Planning Statement [REP1-012]</b> also outlines, with regard for noise and vibration, that with additional mitigation measures in place, the effects on ‘The Off Barn’ receptor can be controlled, as stated within <b>ES Chapter 10: Noise and Vibration [APP/6.2.1]</b>. The residual impact would therefore represent, at most, a minor impact which is not significant in EIA terms.</p> <p>As a result, the overall cumulative balance when weighing these matters (two adverse, two beneficial and one neutral) is neutral.</p>                                                                                                                                                                                                                         |

Table 2.2: Aviation

| ExQ           | Respondent    | Question                                                                                                                                                                                                                                                                                                                           | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| <b>Q2.0.1</b> | The applicant | <p><b>Effects on aviation</b></p> <p>Further to the applicant’s response to Written Representations (WRs) and other Deadline (D) 1 submissions [REP2-028], item KLWN1-5, could the applicant provide an outline timetable for the next steps it has identified in engaging with the Defence Infrastructure Organisation (DIO).</p> | <p>The Applicant is continuing to engage with the MOD in relation to the various matters being discussed between the parties. In relation to Glint and Glare, the Applicant and the MOD are close to reaching an agreed position regarding the requirement for a Glint and Glare Management Plan. In relation to options for mitigating the potential impact upon the Precision Approach Radar (PAR) at RAF Marham, the Applicant has presented these options for the MOD’s consideration and is in the process of agreeing suitable conditions and requirements which would address the MOD’s concerns.</p> <p>The Applicant is awaiting the MOD’s response on these matters but remains confident of reaching an agreed position with the MOD, such that their objection to the Scheme can be withdrawn on all grounds.</p> |

**Table 2.3: Biodiversity and Ecology (including Habitats Regulations Assessment)**

| ExQ           | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant's Response                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <b>Q3.0.1</b> | The applicant | <b>Bird surveys – Stone Curlew (<i>Burhinus oedichnemus</i>)</b><br>Further to the applicant's response to WRs and other D1 submissions [REP2-028], item NE2-1, could the applicant confirm if a response has been received from the Royal Society for the Protection of Birds (RSPB) to confirm any additional records that may be held and advise of the proposed next steps.                                                                                                                                                             | The Applicant can confirm a request was sent to the Royal Society for the Protection of Birds (RSPB) requesting records of Stone-curlew <i>Burhinus oedichnemus</i> from within 500m of the Site, as requested by Natural England. The RSPB have responded to the Applicant and confirmed that there are no records of Stone-curlew within 500m of the Site. As such, no further survey would appear necessary at this time. |
| <b>Q3.0.2</b> | The applicant | <b>Ground-nesting bird mitigation habitat sequencing</b><br>The ExA notes the applicant's response to ExQ1 Q3.0.3 [REP1-069] which refers to the updated outline Landscape and Ecological Management Plan (oLEMP) [REP1-061] confirming that a suitable phasing schedule will be included within the detailed Landscape and Ecological Management Plan (LEMP) once the associated timescales for the construction phase become clear. Could the applicant provide a reference to the paragraph number where this is confirmed in the oLEMP. | The <b>outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11.2]</b> has been updated at Deadline 3 to include confirmation that a suitable phasing schedule will be included within the detailed Landscape and Ecological Management Plan in Section 7.3.                                                                                                                                                       |

**Table 2.4: Climate Change**

| ExQ           | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| <b>Q4.0.1</b> | The applicant | <b>Sourcing of solar panels and batteries</b><br>The applicant's response to ExQ1 Q4.0.3 [REP1-069], includes that efforts would be made to source products and materials locally wherever possible, and that this would be achieved through the applicant's commitments through the Solar Stewardship Initiative. Could the applicant explain how its commitments through the Solar Stewardship Initiative would be secured in the dDCO? | The Solar Stewardship Initiative (SSI) is an industry-based supply chain sustainability assurance scheme dedicated to the needs of the solar PV sector and its customers. The Applicant is 'Buyer Member' of the SSI, meaning that it is actively committing to responsible and ethical procurement of solar hardware, of which the most obvious is solar panels. This is a commitment that includes adherence to robust SSI standards. However, it is not appropriate for this membership to be secured in the <b>draft DCO [APP/3.1.3]</b> , as this would make it a criminal offence for the Applicant to no longer be a member of the SSI (including in circumstances that are out of the Applicant's control, e.g. if the SSI ceases to exist at any point in the future). |

**Table 2.5: Compulsory acquisition, temporary possession and other land or rights considerations**

| ExQ           | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                           | Applicant's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <b>Q5.0.1</b> | The applicant | <b>Funding statement - decommissioning cost estimate</b><br>Further to the applicant's response to ExQ1 Q5.0.13 [REP1-069], and given that the existing cost estimate (Section 2.2, Funding Statement [AS-006]) does not refer to decommissioning costs, could the applicant provide a revised funding statement or additional information that clearly demonstrates that decommissioning can be suitably funded by the applicant. | As noted by the ExA, the response provided by the Applicant to Q5.0.13 within the <b>Applicant's Response to ExQ1 [REP1-069]</b> references a requirement in the <b>draft DCO [APP/3.1.3]</b> requiring the decommissioning of the Scheme. Failure to comply with this requirement would be a criminal offence. Decommissioning securities, which will be regularly re-valued, will be in place to cover the cost of decommissioning. Therefore, the ExA should have sufficient confidence that the decommissioning can be suitably funded by the Applicant. |
| <b>Q5.0.2</b> | The applicant | <b>Option agreements</b><br>Further to the applicant's response to ExQ1 Q5.0.1 [REP1-069], does the applicant envisage that it would have the consent it requires to be able to confirm the durations of the lease included                                                                                                                                                                                                        | The Applicant remains subject to contractual confidentiality obligations in respect of the Option Agreements, including in respect of the durations of the lease. However, the Applicant is seeking to obtain consent from the landowner to permit the disclosure of this information prior to the end of examination, for the benefit of the ExA.                                                                                                                                                                                                           |



|               |                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|               |                          | in the Option Agreements for the Solar Photo-voltaic (PV) Site, the BESS and the National Grid and Customer Substations, before the end of the examination?                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Q5.0.3</b> | The applicant - Part (i) | <p><b>Possible impediments</b></p> <p>Further to Norfolk County Council's (NCC) response to ExQ1 Q5.0.8 [REP1-095], could the applicant and NCC provide updates to their previous responses to ExQ1 Q5.0.8 which has been updated below to take account that Breckland District Council's (BDC) responded for part (ii):</p> <p>i. Is the applicant aware of any land or rights being required in addition to those sought through the dDCO [REP1-005] before the proposed development can become operational?</p> <p>ii. (...)</p> | <p>The Applicant's response to Q5.0.8 within the <b>Applicant's Response to ExQ1 [REP1-069]</b> still stands.</p> <p>However, the Applicant is seeking a meeting with Norfolk County Council to clarify any uncertainties and has provided further details to Norfolk County Council in advance of any meeting to aid discussions around the Applicant's land rights sought.</p> <p>The Applicant will update the ExA regarding this matter once a meeting has taken place.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Q5.0.5</b> | The applicant            | <p><b>Protective provisions</b></p> <p>Further to the applicant's response to ExQ1 Q5.0.15 [REP1-069], could the applicant provide a further update on the progress of negotiations for protective provisions with each of the parties set out in Schedule 15 of the dDCO [REP1-005].</p>                                                                                                                                                                                                                                           | <p>The protective provisions in Parts 1, 2 and 7 (for the protection of electricity/gas/water/sewerage undertakers, operators of electronic communications code networks and drainage authorities respectively) of the <b>draft DCO [APP/3.1.3]</b> are standard protective provisions which are not subject to any ongoing negotiation in relation to the Scheme. Therefore, the Applicant provides updates on only the following protective provisions:</p> <ul style="list-style-type: none"> <li>Part 3 – for the protection of National Grid Electricity Transmission Plc (NGET) – the Applicant and NGET are in discussions regarding an agreed form of these protective provisions, and the Applicant is confident of reaching an agreed position for inclusion in the <b>draft DCO [APP/3.1.3]</b> before the close of examination</li> <li>Part 4 – for the protection of National Highways Limited (NH) – the Applicant and NH are in discussions regarding an agreed form of these protective provisions, and the Applicant is confident of reaching an agreed position for inclusion in the <b>draft DCO [APP/3.1.3]</b> before the close of examination</li> <li>Part 5 – for the protection of the Environment Agency (EA) – the Applicant updated the protective provisions for the benefit of the EA at Deadline 1 to mirror the EA's preferred wording (and the Applicant also refers to its response to EA20 in the <b>Applicant's Response to Written Representations and other Deadline 2 Submissions [APP/8.16]</b>)</li> <li>Part 6 – for the protection of Exolum Pipeline System Limited – the Applicant has removed these protective provisions from the <b>draft DCO [APP/3.1.3]</b> submitted at Deadline 3 after receiving final confirmation from Exolum that it does not own nor operate any assets relevant to the Scheme</li> <li>Part 8 – for the protection of Anglian Water Services Limited (AW) – the Applicant and AW have agreed the form of protective provisions (the wording of which remains included in Part 8 of Schedule 15 of the <b>draft DCO [APP/3.1.3]</b>) for the benefit of AW. AW withdrew its objection to the Scheme in relation to the protective provisions at Deadline 1 (see <b>[REP1-074]</b> and <b>[REP1-075]</b>); and</li> <li>Part 9 – for the protection of Eastern Power Networks Plc (EPN) – the Applicant notes that EPN has not objected to the Scheme and therefore does not expect to alter the protective provisions for the benefit of EPN.</li> </ul> |
| <b>Q5.0.6</b> | The applicant            | <p><b>Plot reference number 2-15 shown on the Land Plan</b></p> <p>With reference to Section 4.1.1, Book of Reference (BoR) [REP1-009], could the applicant provide clarification as to why CA of new rights and imposition of restrictions over land are required for the section of plot reference number 2-15 (Sheet 4, Land plans [APP-008]), which is located between Finger Hill cabin and the intersection of northern boundaries of fields 12 and 13.</p>                                                                   | <p>The Applicant is seeking new rights and imposition of restrictions over Plot 2-15 for the purpose of access rights – namely improving, maintaining and using an existing private track during the operational phase of the Scheme. Plot 2-15 also provides alternative access to the dwelling known as Finger Hill, should this be required.</p> <p>The Applicant also refers to the <b>Works Plan [APP/2.3.1]</b> and Schedule 9 of the <b>draft DCO [APP/3.1.3]</b> in this regard.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

**Table 2.6: Cultural Heritage and Archaeology**

| ExQ           | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Q6.0.1</b> | The applicant | <p><b>Scenario A (both existing and new pylons) and Scenario B (double turn in option)</b></p> <p>Environmental Statement (ES) ES Chapter 8 [APP-057], paragraph 8.8.29, sets out that the applicant’s preferred solution is the double turn in option which would allow for the decommissioning and removal of the existing section of overhead line (Scenario B), thereby reducing long term visual and heritage impacts on the local area. Could the applicant also set out its view on whether there are any disadvantages with Scenario B compared with Scenario A (both existing and new pylons).</p> | <p>As detailed in paragraphs 8.8.37, 8.8.41 and 8.8.44 of <b>ES Chapter 8: Cultural Heritage and Archaeology</b> [APP-057], whilst Scenario B would introduce additional pylons into certain views from heritage assets, these pylons would be located further away from the assets and those pylons in closer proximity would be removed. Therefore, it is considered that the increase in distance between the assets and the pylons balances out the increase in the number of pylons, thereby resulting in a neutral effect. In heritage terms, therefore, the Applicant does not consider that there are any disadvantages with Scenario B compared with Scenario A.</p> <p>In landscape and visual terms, the Applicant also does not consider there to be any disadvantages with regards Scenario B in comparison to Scenario A. Under Scenario B, the pylons and overhead lines would be located a greater distance from the Peddars Way and Norfolk Coast Path recreational trails and residents at Castle Acre in comparison to Scenario A.</p> |

**Table 2.7: Draft Development Consent Order (DCO)**

| ExQ                              | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                 | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>General</b>                   |               |                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Q7.0.1</b>                    | The applicant | <p><b>Changes to the dDCO if substation is located outside of Order limits</b></p> <p>Could the applicant explain what changes it believes should be made to the dDCO if National Grid Electricity Transmission (NGET) do decide that the sub-station should be located elsewhere i.e. not within the Drovers Order limits.</p>                                                                                          | <p>NGET has confirmed that it “<i>will not be in a position to provide any position regarding the size, design or location of the substation proposed in the Order application during the course of the Examination or prior to the decision of the Secretary of State</i>” [REP1-091].</p> <p>The Applicant’s expectation remains that NGET will determine that the proposed location for the National Grid Substation is suitable (given the Applicant’s site selection methodology being akin to NGET’s site selection process), as set out in the Applicant’s <b>Response to section 89(3) letter dated 17 March 2026</b> [AS-063]. The Applicant, therefore, does not consider that there should be any changes made to the <b>draft DCO</b> [APP/3.1.3] at this time.</p> <p>However, if NGET were to decide that the National Grid Substation should be located outside of the Order limits, the Applicant retains the ability to separately seek consent for the grid connection from the Customer Substation to the National Grid Substation. If this happens post-consent, then any future consent application made by the Applicant in this regard (whether as a change to the DCO or a separate planning application under the Town and Country Planning Act 1990) for the connection from the Customer Substation to that National Grid Substation would cumulatively assess that application with the works consented under the DCO. This will ensure there is no ‘gap’ in the assessment of environmental effects, and this could include the production of a new Environmental Statement for the separate connection application.</p> <p>The Applicant does not consider it helpful nor necessary to speculate as to what that separate application (including a change to the DCO, if that route is selected) would comprise at this stage, given its continuing expectation that NGET will determine that the proposed location for the National Grid Substation (i.e. within the Order limits) is suitable.</p> |
| <b>Part 2 - Principal Powers</b> |               |                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Q7.1.1</b>                    | The applicant | <p><b>Article 6 - Disapplication and modification of legislation, etc.</b></p> <p>In its WR at D2 [REP2-035], the Environment Agency (EA) states that under Section 150 of the Planning Act 2008, it does not consent to disapplication of Regulation 12 of the Environmental Permitting Regulations 2019 with respect to flood risk activities. It states it is not necessary to disapply Regulation 12, because no</p> | <p>The Applicant has been in discussions with the Environment Agency in relation to this matter. It is the Applicant’s position that, whilst the majority of the Order limits are located within Flood Zone 1, there is a minor section of Work No. 11: Mitigation and Enhancement Area, associated with Skylark plots, which is located in Flood Zones 2 and 3. As such, activities could be carried out on the floodplain of a main river, more than 8 metres from the river bank, such as stockpiling in this area. Therefore, in accordance with the Government’s guidance entitled ‘Flood risk activities: environmental permits’, such activities could require a FRAP.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |



| ExQ                                   | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicant's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                       |               | <p>Flood Risk Activity Permits (FRAP) are required given the Order limits are not within the floodplain of a main river.</p> <p>On the basis of the EA's position, does the applicant agree that sub-paragraph (e) of Article 6 and Part 6 of Schedule 15 (Protective Provisions) of the dDCO [REP2-004] are no longer required? If it disagrees, could the applicant give a clear explanation for retention of these parts of the dDCO and set out a timetable for seeking the EA's consent under Section 150 of the Planning Act prior to the end of the Examination?</p> | <p>The inclusion of disapplication therefore serves as a contingency to avoid unnecessary consenting duplication, rather than reflecting a substantive need for FRAP consent across the Scheme.</p> <p>In accordance with this approach, the Applicant updated the protective provisions for the benefit of the Environment Agency in Part 5 of Schedule 15 of the draft DCO at Deadline 1 to mirror the Environment Agency's preferred wording.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Q7.1.2</b>                         | The applicant | <p><b>Article 7 - Defence to proceedings in respect of statutory nuisance</b></p> <p>With reference to Article 7(2) of the dDCO [REP1-004], the applicant is asked to review the wording for consistency with title of Section 61 of the Control of Pollution Act 1974 which refers to 'Prior consent for work on construction sites' and consider whether 7(2) should be revised to include 'Prior' as shown below in bold:</p> <p><i>"Section 61(9) (Prior consent for work on construction sites..."</i></p>                                                             | <p>The Applicant agrees with this proposed amendment to the <b>draft DCO [APP/3.1.3]</b> and has updated the drafting accordingly at Deadline 3.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Part 3 - Streets</b>               |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Q7.2.1</b>                         | The applicant | <p><b>Article 8 - Streetworks</b></p> <p>The ExA notes the inclusion of paragraph 8(4) in the recently made Springwell Solar Farm Order. This provision was inserted by the Secretary of State (SoS) to make clear the meaning of apparatus. Please include a similar provision in the draft Order or explain why it is not necessary.</p>                                                                                                                                                                                                                                  | <p>The Applicant does not consider that this amendment is necessary. Article 8(4) of the Springwell Solar Farm Order 2026 states that <i>"in this article "apparatus" has the same meaning as in Part 3 (street works in England and Wales) of the 1991 Act"</i>. However, the definition of "apparatus" in Article 2 of the <b>draft DCO [APP/3.1.3]</b> already states that this <i>"has the same meaning as in Part 3 (street works in England and Wales) of the 1991 Act except that, unless otherwise provided, it further includes pipelines (and parts of them), aerial markers, cathodic protection test posts, field boundary markers, transformer rectifier kiosks, electricity cables, telecommunications equipment and electricity cabinets"</i> (emphasis added).</p> <p>Therefore, the Applicant considers that the definition of "apparatus" is sufficiently clear, and notes that this new article was not included in the recently-made Dean Moor Solar Farm Order 2026 nor the Peartree Hill Solar Farm Order 2026.</p> |
| <b>Q7.2.3</b>                         | The applicant | <p><b>Article 16 - Traffic Regulation Measures</b></p> <p>The ExA notes from the recently made Springwell Solar Farm Order, the amendment by the SoS to Article 17(6) to include Article 17(6)(c) which requires the undertaker to display a site notice with the information required by Article 17(6)(a)–(b). This is consistent with the position taken in previous DCOs. Please include a similar provision in the draft Order for Article 16(5) or explain why it is not necessary.</p>                                                                                | <p>The Applicant agrees with this proposed amendment to the <b>draft DCO [APP/3.1.3]</b> and has updated the drafting accordingly at Deadline 3.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Part 5 – Powers of acquisition</b> |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Q7.3.1</b>                         | The applicant | <p><b>Article 27 - Power to override easements and other rights</b></p> <p>The ExA notes from the recently made Springwell Solar Farm Order, the amendment to Article 27(4) by the SoS to include the words <i>'or any contractors, servants or agents of the undertaker'</i>. Please include a similar provision in the draft Order for Article 27(4) or explain why it is not necessary.</p>                                                                                                                                                                              | <p>The Applicant does not consider that this amendment is necessary. If a <i>"contractor, servant or agent of the undertaker"</i> derived title from the undertaker, then that person is already covered by the provisions of Article 27(4). If that person did not derive title (i.e. the undertaker still owns the relevant land), then the undertaker remains responsible for that person (including for liability and compensation) and therefore this sub-paragraph does not apply.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |



| ExQ                                                      | Respondent                       | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicant's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Q7.3.2</b>                                            | The applicant                    | <b>Article 39 - Planning permission, etc.</b><br>Could the applicant provide a more specific justification in the EM [REP2-007] as to why these provisions are necessary in this dDCO in the particular circumstances of the proposed development. Is the applicant able to provide examples of precedents in articles from other solar farm projects?                                                                                                                                                                                                                                                     | <p>The Applicant considers these provisions to be necessary in the <b>draft DCO [APP/3.1.3]</b> to address the potential scenario that, if the National Grid Substation (as associated development to the Scheme) is built by NGET pursuant to a separate planning permission rather than pursuant to the DCO, any separate consent would not invalidate the terms of the <b>draft DCO [APP/3.1.3]</b> for the Scheme. The Applicant refers to its <b>Response to section 89(3) letter dated 17 March 2026 [AS-063]</b> for an explanation of this possibility (albeit noting that the Applicant considers this to be unlikely) and the justification for this approach.</p> <p>Whilst not solar DCOs, these provisions have precedent in article 45 of the London Luton Airport Expansion Development Consent Order 2025 and article 56 of the A122 (Lower Thames Crossing) Development Consent Order 2025.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Q7.3.3</b>                                            | The applicant                    | <b>Article 41 - Trees subject to tree preservation orders</b><br>The ExA notes from the recently made Springwell Solar Farm Order, the amendment to Article 40 to include a new paragraph 5. This provision was inserted by the SoS to make clear the meaning of tree preservation order. Please include a similar provision in the draft Order for Article 41 or explain why it is not necessary.                                                                                                                                                                                                         | <p>The Applicant does not consider that this amendment is necessary, given that the terminology regarding tree preservation orders is set out in the Planning Act 2008 (including with reference to the Town and Country Planning Act 1990) and is therefore already incorporated into the <b>draft DCO [APP/3.1.3]</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Q7.3.4</b>                                            | The applicant - Parts (i) & (ii) | <b>Article 49 - Maintenance of drainage works</b><br><ul style="list-style-type: none"><li>i. Could the applicant provide a more detailed justification as to why these provisions are necessary in this particular dDCO in the circumstances of the proposed development, particularly given ES Chapter 11 [AS-019] notes in paragraph 11.6.23 that the soils are free-draining and there are no extensive under-field drainage schemes within the Order limits.</li><li>ii. Could the applicant confirm whether its approach has been accepted in any previously made DCOs.</li><li>iii. (...)</li></ul> | <ul style="list-style-type: none"><li>i. This provision makes it clear that any realignment of award drains or other works to them that are carried out as part of the Scheme do not affect the existing allocation of responsibility for maintenance of those drains, unless this is agreed between the Applicant and the responsible party. The provision gives certainty to both the Applicant and to those that possess that responsibility, and enables agreement on reallocation of responsibilities to be reached where it is appropriate. In relation to the Scheme specifically, while <b>ES Chapter 12: Water Resources [APP/6.2.2]</b> notes that no field drainage was observed during the Site walkovers and that the landowner knows of no field drainage systems within the Order limits, paragraph 12.6.66 of <b>ES Chapter 12: Water Resources [APP/6.2.2]</b> notes the presence of an irrigation system close to the Order limits (Field 4). Per Article 72(1)(b) of the Land Drainage Act 1991, 'drainage' includes 'irrigation'. Therefore, the <b>draft DCO [APP/3.1.3]</b>, via Article 49, retains the ability to ensure the function of this irrigation system, should the extent of the system encroach within the Order limits.</li><li>ii. The provision is well precedented, including in the M25 Junction 10/A3 Wisley Interchange Development Consent Order 2022, the A66 Northern Trans-Pennine Development Consent Order 2024, and the London Luton Airport Expansion Development Consent Order 2025, and the Applicant considers that it is a sensible inclusion to clarify who has responsibility for such works.</li></ul> |
| <b>Schedule 2 - Requirements</b>                         |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Q7.4.1</b>                                            | The applicant                    | <b>Requirement (R) 5 - Detailed design approval</b><br>Limits of deviation are not included in the dDCO [APP-018]. Could the applicant confirm whether the limits of deviation for the pylons are included within the parameters referred to in the Design Principles, Parameters and Commitments [APP-048] (to be certified in Schedule 13 of the dDCO).                                                                                                                                                                                                                                                  | <p>The spatial limits of deviation are incorporated within the spatial extents of Work No. 5 as shown on the <b>Works Plan [APP/2.3.1]</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Q7.4.4</b>                                            | The applicant                    | <b>R13 – Construction environmental management plan</b><br>R13 (1) Could the applicant explain what the approval process would be for the proposed permitted preliminary works environmental management plan which is referred to in R13(1) of the dDCO [REP2-005].                                                                                                                                                                                                                                                                                                                                        | <p>The Applicant notes that there is no approval process for the permitted preliminary works environmental management plan under Requirement 13 of Schedule 2 of the <b>draft DCO [APP/3.1.3]</b>. This is because this document will be submitted at Deadline 4 for comments from Interested Parties, with the final version to be submitted during the course of the examination. Therefore, no further approval process post-examination will be required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Schedule 13 – Documents and plans to be certified</b> |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |



| ExQ                                    | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>Q7.5.1</b>                          | The applicant | <p><b>Part 1 – Documents and Plans</b></p> <p>Could the applicant explain in the Explanatory Memorandum its rationale for its choice of including only certain ES chapters in Schedule 13, Part 1, of the dDCO [REP2-005].</p>                                                                                                                                                                                                                                                                                                                                                                       | <p>The Applicant notes that Part 1 of Schedule 13 of the <b>draft DCO [APP/3.1.3]</b> does not include specific ES chapters; rather, it refers to the entire “<i>Environmental Statement</i>” in the 4<sup>th</sup> row of the table.</p> <p>In relation to the specific ES chapters that are included in Part 2 of Schedule 13, these reflect the ES chapters that have been updated during the course of the examination, and are therefore listed to replace the versions of those documents that were submitted with the DCO Application, as is standard practice.</p> |
| <b>Schedule 14 – Arbitration rules</b> |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Q7.6.1</b>                          | The applicant | <p><b>Article 8 - Confidentiality</b></p> <p>The ExA notes from the recently made Springwell Solar Farm Order, the amendment to Article 7 by the SoS so that arbitration hearings and documentation are open to and accessible by the public (para 7(1)), with the arbitrator empowered to direct privacy or confidentiality to protect commercially sensitive information (para 7(2)) and an express carve-out for disclosures required by court order or enactment (para 7(3)).</p> <p>Please include a similar provision in the draft Order for Article 8 or explain why it is not necessary.</p> | <p>The Applicant notes that the ExA is referring to paragraph 7 of Schedule 14 of the Springwell Solar Farm Order 2026.</p> <p>The Applicant agrees with this proposed amendment to the <b>draft DCO [APP/3.1.3]</b> and has updated the drafting accordingly at Deadline 3.</p>                                                                                                                                                                                                                                                                                           |

Table 2.8: Flood Risk, hydrology and water resources

| ExQ           | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>Q8.0.2</b> | The applicant | <p><b>The Sequential Approach and mitigation pluvial flood risk</b></p> <p>In addition to the applicant’s response to ExQ1 Q8.0.6 [REP1-069], and noting that detailed design is not available pre-consent and hence cannot be relied upon, can the applicant:</p> <p>i. assist with demonstration of the sequential approach (and compliance with 5.8.29 and bullet 3 of 5.8.36 of NPS EN-1) by explaining clearly why more vulnerable elements of the proposed development have to be located in areas of pluvial flood risk, even where this pluvial risk encroachment is limited to a small section of the proposed works and/or may be avoided by detailed design? Can the applicant articulate what other factors require these more vulnerable aspects of the proposed development to be located where they are at this stage of design so that the specific requirements of the NPS sequential approach policy can be shown to be met?</p> <p>ii. in relation to the stated assertion in the applicant’s response to relevant representations (RRs) [REP1-067] that the pluvial flow paths can be managed by the proposed Sustainable Drainage System (SuDS) system, provide certainty that the SuDS drainage system would be designed to have sufficient capacity for rainfall generated by the impermeable areas of the proposed development catchment, the fire suppressant volume and rainfall originating outside of the calculated catchment area which manifests as the pluvial flow paths identified?</p> | <p>i. The Applicant wishes to note, at the outset of this response, that paragraph 5.8.21 of NPS EN-1 (2023) expressly references, through footnote 213, the Sequential Test requirements set out in the Planning Practice Guidance (PPG). Accordingly, NPS EN-1 does not establish a standalone Sequential Test regime for all forms of flood risk, but instead directs applicants and decision-makers to the Government’s detailed guidance on how the Sequential Test should be applied. Paragraph 027 of the Flood Risk and Coastal Change PPG states:</p> <p><i>“Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (...) without increasing flood risk elsewhere, then the sequential test need not be applied.”</i></p> <p>The PPG therefore draws a clear distinction between flood risk arising from rivers and the sea (i.e. fluvial flood risk) and surface water flood risk (i.e. pluvial flood risk). In relation to surface water flooding, national policy does not require a Sequential Test where the risks can be appropriately addressed through design and mitigation measures on the Site. <b>ES Appendix 12.2: Flood Risk Assessment [APP/6.4.3]</b> demonstrates that the Scheme can be made safe for its operational lifetime and will not increase flood risk elsewhere. Furthermore, the <b>Design Principles, Parameters and Commitments [APP/5.8.3]</b> have been updated at Deadline 3 to commit to locating the most vulnerable aspects of Work Nos. 2 - 4 outside modelled pluvial flood extents. The circumstances anticipated by PPG paragraph 027 are therefore satisfied and, accordingly, application of the Sequential Test is passed.</p> <p>The Applicant nevertheless recognises the requirements of paragraphs 5.8.29 and 5.8.36 of NPS EN-1 (2023) and has sought to avoid higher flood risk areas through site selection and Scheme design wherever reasonably practicable. Importantly, those provisions should be read in the context of paragraph 5.8.21 of NPS EN-1 (2023) and footnote 225, which direct the application of the Sequential Test back to the PPG. It would therefore be inconsistent with the policy framework established by NPS EN-1 (2023) to require a</p> |



| ExQ           | Respondent                | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Applicant's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|               |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Sequential Test exercise for surface water flood risk in circumstances where the PPG expressly states that such a test need not be applied.</p> <p>Paragraph 5.8.29 of NPS EN-1 (2023) states that the sequential approach should be applied to the layout and design of the project, with vulnerable elements located in parts of the site at lower flood risk where reasonably practicable. The Scheme accords with this requirement. <b>ES Figure 5.1: Concept Masterplan [AS-022]</b> is illustrative and retains reasonable flexibility within the Order limits. The final design will be developed post-consent and infrastructure can be micro-sited to avoid localised pluvial flow paths and depressions where these are identified through detailed design.</p> <p>Consequently, the Scheme already satisfies the objective in question through a combination of design flexibility, embedded avoidance measures and committed mitigation. There is, therefore, no policy basis within either NPS EN-1 or the PPG for requiring a separate Sequential Test solely in respect of mapped pluvial flood risk.</p> <p>ii. As outlined in paragraph 12.1.41 of <b>ES Appendix 12.2: Flood Risk Assessment [APP/6.4.3]</b>, observations from the Site walkover show superficial cover in Fields 24 and 27 to be free draining and are therefore unlikely to promote overland flow substantial enough to create a pluvial flow pathway. Section 12.3 of the same document outlines that the introduction of grassland in Work No. 1 upslope of Work Nos. 2 - 4 is likely to promote controlled runoff compared to the baseline agricultural scenario. The addition of planting immediately west of Work Nos. 2 - 4 will also act to slow overland flows, meaning the SuDS features to serve Work Nos. 2- 4 are unlikely to become overwhelmed in the unlikely event of a BESS fire occurring at the same time as the 1% AEP + 40% climate change event. Further, the sizing and location of the attenuation structure(s) will be reviewed following the grant of the DCO, and will be cognisant of factors (such as existing drainage pathways), which is secured through Requirement 11 of the <b>draft DCO [APP/3.1.3]</b>.</p> |
| <b>Q8.0.4</b> | The applicant - Part (ii) | <p><b>Ordinary watercourse land drainage consent</b></p> <p>The updated Operational Environmental Management Plan (oOEMP) [REP2-024] at table 3-7 states that works involving watercourses would ordinarily require Land Drainage Consents from the LLFA, and that it is intended that these requirements would be disapplied through the DCO; this is reflected in Article 6 (1) sub paragraphs a to b of the dDCO [REP2-004] which would disapply the relevant parts of the Land Drainage Act 1991. In its response to ExQ1 Q 8.0.10 [REP1-069], the applicant states that in-stream engineering works will not require Ordinary Watercourse consent from the LLFA; ES Chapter 12, section 12.8.58 states this is because the identified ditches within the Order limits are not connected to the wider hydrological network and so they are not classed as ordinary watercourses.</p> <p>i. (...)</p> <p>ii. Could the applicant confirm why, through Article 6, they are seeking to disapply the relevant parts of the Land Drainage Act through the draft DCO if they are of the view there are no ordinary watercourses affected by the proposed development and hence no works requiring land drainage consent from the LLFA?</p> | <p>ii. Whilst the majority of the watercourses within the Order limits are not connected to the wider hydrological network and are therefore not ordinary watercourses, there is a minor watercourse within Work No. 11: Mitigation and Enhancement Area, associated with Skylark plots, which is connected to the River Nar. It is not anticipated that the activities within Work No. 11 will require engineering works within the channel. However, the inclusion of disapplication serves as a contingency to avoid unnecessary consenting duplication, rather than reflecting a substantive need for Ordinary Watercourse consent across Work No. 11.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Q8.0.5</b> | The applicant             | <b>Update to flood mapping</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>The May 2026 updates to the Flood Map for Planning do not alter the extents of flooding from the River Nar and do not necessitate a requirement to update figures or text within <b>ES Appendix 12.2: Flood Risk Assessment</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |



| ExQ           | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                      | Applicant's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|               |               | The Environment Agency published an update to the Flood Map for Planning online data set in May 2026. Could the applicant comment on whether the updated data set would have implications for the FRA [AS-053] or the assessment of flood risk effects set out in ES Chapter 12 [APP-061]?                                                                                                                                    | <b>[APP/6.4.3]</b> nor the conclusions that the Scheme is at negligible risk of fluvial flooding and low risk of pluvial flooding (which remain unchanged).<br><br>Only Work No. 11, for skylark mitigation, is located in this area and the Applicant's proposed land use in this regard is appropriate in Flood Zones 2 and 3.                                                                                                                                                                                                                                                                                            |
| <b>Q8.0.7</b> | The applicant | <b>Resolving issues with the LLFA</b><br><br>At D1, the SoCG between the applicant and NCC [REP1-019] shows a number of unresolved issues in discussion (amber), and four issues rated red indicating both parties have reached a position that a matter cannot be agreed.<br><br>Could the applicant set out a timetable of proposed actions it intends to undertake to attempt to resolve these issues set out in the SoCG? | The Applicant is in regular dialogue with the LLFA. The updated <b>ES Appendix 12.2: Flood Risk Assessment [APP/6.4.3]</b> (submitted at Deadline 2) and the <b>Applicant's Response to Relevant Representations [REP1-067]</b> (submitted at Deadline 1) provide clarity on points raised by the LLFA.<br><br>The Applicant confirms that it will continue to work with the LLFA to resolve matters via the <b>SoCG with Norfolk County Council [APP/5.12.1]</b> . This SoCG has been updated at Deadline 3 and reflects the latest position of agreement, or otherwise, between the Applicant and Norfolk County Council. |

Table 2.9: Grid Connection

| ExQ           | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <b>Q9.0.2</b> | The applicant | <b>Scenario A (both existing and new pylons) and Scenario B (double turn in option)</b><br><br>Further to the applicant's response to ExQ1 Q9.0.1 part (iv) [REP1-069], the ExA notes that ES Appendix 5.1 Illustrative Technical Information (Tracked) Section 2: Illustrative Grid Connection Infrastructure Routing [REP1-047] provides a plan view showing the proposed double turn in diversion which shows the extent of the overhead line to be removed to the north of Bartholomew's Hill plantation.<br><br>i. Could the applicant confirm whether Scenario A (both existing and new pylons) is shown in its photomontages ES Figure 6.14 PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme Parts A, B and C [APP-103] [APP-104] [APP-105].<br><br>ii. Could the applicant confirm whether Scenario A (both existing and new pylons) is shown in its wirelines ES Figure 6.12 PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires Parts A, B, C and D [APP-095] [APP-096] [APP-097] [APP-098]. | The relevant references in relation to this matter have been updated to:<br><br><ul style="list-style-type: none"> <li>• <b>ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [AS-023] [AS-025] [AS-027] [AS-029]</b>; and</li> <li>• <b>ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [APP/6.3.2]</b>.</li> </ul> i) The Applicant confirms that for Scenario A, both the existing and new pylons are shown on the above referenced figures.<br><br>ii) The Applicant confirms that for Scenario A, both the existing and new pylons are indicated on the wirelines shown on <b>ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [AS-023] [AS-025] [AS-027] [AS-029]</b> . |



Table 2.10: Land and Soil

| ExQ            | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                       | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>Q10.0.2</b> | The applicant | <p><b>Outline Soil Management Plan</b></p> <p>Further to the applicant’s response to WRs and other D1 submissions [REP2-028], item NE1-3 Soils, which included concerns from Natural England that the outline Soil Management Plan is currently high-level and does not yet provide sufficient detail, could the applicant set out a timescale for engagement with Natural England and updates to the outline Soil Management Plan (oSMP).</p> | <p>The Applicant has written to Natural England on this matter (letter from LDA Design to Natural England dated 9 July 2026). This letter explained that the Applicant is in agreement that details of soil management can be provided through a detailed Soil Management Plan to be secured by DCO Requirement, such that the <b>oSMP [REP1-062]</b> does not need to be updated now and the <b>SoCG with Natural England [APP/5.15.1]</b> ought to be moved to agreed. In respect of other matters still at amber in <b>SoCG with Natural England [APP/5.15.1]</b>, the information has been provided and should be capable of being agreed.</p> <p>The Applicant agrees with Natural England that the details in respect of “<i>soil handling methods, stockpile design, reinstatement techniques, moisture-condition controls and construction phase monitoring are described only in general terms</i>” (see <b>[RR-038]</b>, Topic NE14). The <b>oSMP [REP1-062]</b> also provides information about reinstatement criteria and after care, and site-specific protection measures for areas such as BESS levelling, cable trenches and decommissioning only.</p> <p>The Applicant agrees that all these matters need to be provided in greater detail as the Site details are refined, and all these matters need to be provided within a detailed Soil Management Plan; which is secured via a requirement of the <b>draft DCO [APP/3.1.3]</b>.</p> <p>At Relevant Representations stage, Natural England commented that these matters would be expected “<i>to be addressed in the detailed SMP and secured through a DCO Requirement</i>” (see NE14 in <b>[RR-038]</b>). The Applicant agrees and considers that there appears to be agreement with Natural England on these matters.</p> |

Table 2.11: Landscape and Visual

| ExQ            | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <b>Q11.0.1</b> | The applicant | <p><b>Residential Visual Amenity Assessment</b></p> <p>ES Appendix 6.7 Residential Visual Amenity Assessment [APP-145], paragraph 7.3.31 references that the proposed development would be offset from P1 – Keeper’s cottage’s property curtilage, with a generous field margin proposed along the northern edge of Field 11 and that on balance the visual effect at this property would not reach the Residential Visual Amenity Threshold.</p> <p>For its assessment of Keeper’s cottage, could the applicant confirm the dimensions assumed for the proposed field margin, the threshold limit and how the proposed dimensions for the field margin would be secured in the dDCO.</p> | <p>Keepers Cottage is offset approximately 110 metres from the Solar PV Arrays to the south within Field 11 beyond a proposed hedge and generous field margin. The property is ‘involved’ and within the landowner’s estate. Keepers Cottage would remain within a generous field margin and a new hedge is proposed to mitigate the visual effects of the Solar PV Arrays within Field 11 approximately 110m to the south. The Solar PV Arrays area within Field 11 is parameter-bound and secured via Work No. 1 of the <b>draft DCO [APP/3.1.3]</b> which is spatially shown in <b>Works Plan [APP/2.3.1]</b> (which, in turn, is a certified document pursuant to Schedule 13 of the <b>draft DCO [APP/3.1.3]</b>).</p> <p>A significant visual impact has been identified within the <b>ES Appendix 6.7: Residential Visual Amenity Assessment [APP-145]</b> for the residents within Keepers Cottage and, accordingly, a further assessment of the RVAA threshold is provided within paragraphs 7.3.21 to 7.3.31 of that document. The further assessment summarises, in paragraph 7.3.31, that the visual impact on Keepers Cottage would not breach the RVAA threshold due to the distance, absence of an overbearing effect and the embedded mitigation.</p> <p>Whether or not a proposed development, such as the Scheme, is considered to surpass the RVAA threshold is a matter of professional judgment based on reasoned criteria as outlined within the methodology in <b>ES Appendix 6.7: Residential Visual Amenity Assessment [APP-145]</b>. Whether a proposed development, such as the Scheme, has surpassed the RVAA threshold is a professional judgement as to whether the visual impacts on the private views of residents are considered so overbearing or overwhelming that they would result in unacceptable effects on the living conditions of the residents within the property in question. This is a high bar in terms of the assessment and not simply a matter of whether particular resident is likely to experience a significant visual impact from a development.</p> |
| <b>Q11.0.2</b> | The applicant | <p><b>Landscape and visual effects for new pylons</b></p> <p>Table 3-5 of Design Principles, Parameters Commitments [APP-048] states that the new pylons would be a maximum height</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>i. The height of the proposed pylons are shown at 55m AOD within the Parameter Wirelines and 49m AOD for the Illustrative Photomontages based upon initial concept and design work. <b>ES Chapter 6: Landscape and Visual [AS-016]</b> has assessed the 55m AOD parameter as the ‘worse case’ scenario’ in accordance with Rochdale Envelope principles. The base height of all the proposed pylons is the existing ground level, with</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |



| ExQ            | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Applicant's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|                |               | <p>above ground level of 55m and that this is broadly similar to the existing pylons.</p> <p>i. Given the modelled ground levels discussed in ExQ2 Q1.0.1 above, could the applicant confirm if the maximum height above ground level is the maximum height above <u>existing</u> ground level, particularly for the pylons providing connections to the National Grid substation, and what the height of the existing pylons are?</p> <p>ii. For viewpoint VP12 Castle Acre Priory - Could the applicant explain why there appears to be a considerable difference between the height of the photowire shown in ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires (Part C) (Clean) (Revision 1) [AS-027] and the height of the pylons shown in the photomontage in ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme (Part B) (Revision 1) [AS-042] on the horizon behind the Priory?</p> <p>iii. Could the applicant explain its approach to the mitigation hierarchy for the grid connection infrastructure, and the new pylons in particular.</p>                                                                                                                                                                        | <p>exception of the pylon directly to the north-west of the National Grid Substation within Field 27, which would be located on the same base level or development platform at 55m AOD.</p> <p>ii. The reason for the difference from VP12 at Castle Acre Priory is that the Parameter Wirelines model the pylon heights at 55m AOD, whilst the Illustrative Photomontages model the pylons at 49m AOD as an initial design concept. The 55m AOD height pylons within the Parameter Wirelines illustrates the 'worst case scenario' in accordance with Rochdale Envelope principles.</p> <p>iii. The location of the Grid Connection Infrastructure follows the mitigation hierarchy in terms of avoiding more elevated and visible part of the Site and minimising the effects through co-location of infrastructure. The Grid Connection Infrastructure must, as a functional requirement, be co-located with the existing pylons and overhead transmission lines. Co-location with the existing pylons and transmission lines avoids and reduces the landscape and visual effects elsewhere within the Site, which are less influenced by the existing infrastructure. Initial landscape and visual analysis has informed the location of the Grid Infrastructure within Fields 24 and 27 within the north-west of the Order limits. These fields occupy a relatively low-lying area enclosed by local landform, hedges and woodland to reduce the effects on the surrounding landscape. The effects would be further mitigated by proposed hedge and woodland planting as secured within the <b>oLEMP [APP/7.11.2]</b>.</p> |
| <b>Q11.0.3</b> | The applicant | <p><b>ES Figure 6.12 Viewpoint 6 - Public Right of Way (PRoW) South Acre RB2</b></p> <p>ES Figure 6.12 Viewpoint 6 - ProW South Acre RB2 Part A [APP-095] shows the legends for and the maximum extents of both the siting zones for Solar PV Array (modelled at 4.5m high) and for Grid Connection Infrastructure (modelled at 55m high). The legends are also shown for the maximum extents of siting zones for the BESS (modelled at 3.5m high), Customer Substation (modelled at 13m high), and National Grid Substation (modelled at 13m high).</p> <p>i. Could the applicant confirm whether the wirelines views in ES Figure 6.12 Part A [APP-095] are correct in that the BESS, Customer Substation and National Grid Substation would not be visible from this viewpoint.</p> <p>ii. Could the horizon on Figure 6.12 [APP-095] be annotated to show the extent of the proposed substations and BESS locations, together with the existing Bartholomew's Hill plantation.</p> <p>iii. Could the applicant confirm if the right side of Wireline (right) is modelled correctly as the right hand edge terminates before the existing woodland whereas works plan [APP-009] shows that the extent of the solar PV array area continues to meet the existing woodland.</p> | <p>i. The Winter Parameter Wirelines for ES Figure 6.12 for Viewpoint 6 has not changed. The reference has been updated to: <b>ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires (Part A) [AS-023]</b>. The BESS, Customer Substation and National Grid Substation would not be visible from VP6 due to the intervening distance, rising landform, hedges and woodland.</p> <p>ii. The photopanel for VP6 in winter have been updated within <b>ES Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels (Part A) [APP/6.3.1]</b> and in summer within <b>ES Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels (Part A) [APP/6.3.1]</b> at Deadline 3 to identify the existing woodland and treebelt annotations on the horizon within Viewpoint 6.</p> <p>iii. The wireline has been modelled correctly. The extent of the Solar PV Array does not extend into the north-western corner of Field 4, as shown on the <b>Works Plan [APP/2.3.1]</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Q11.0.4</b> | The applicant | <p><b>Protection of key landscape features</b></p> <p>i. Further to the applicant's response to LIRs [REP2-027], item BKLWN13 paragraph 2.4.3 could the applicant also provide additional information to address how the protection of key</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>i. Key landscape features within the Order limits will be protected during the construction, operation and decommissioning phases of the Scheme through implementation of the <b>oLEMP [APP/7.11.2]</b>. Bartholomew's Hill Plantation is not located within the Order limits and is, therefore, not within the Applicant's control. As with</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |



| ExQ            | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|                |               | <p>landscape features (including Bartholomew’s Hill Plantation) adjoining the Order limits would be secured in the dDCO.</p> <p>ii. Further to the applicant’s response to WRs and other D1 submissions [REP2-028], item HE50, could the applicant comment on Historic England’s point that any consent should also require the proposed maintenance and strengthening of the planting which screens and filters the impact of the development, in particular that at Bartholomew’s Hill Plantation.</p> | <p>many other areas of woodland in the wider study area, there is no reason to suggest that Bartholomew’s Hill Plantation would be removed.</p> <p>ii. The existing and proposed vegetation within the Order limits will be managed to encourage visual screening, as outlined within the <b>oLEMP [APP/7.11.2]</b>. Bartholomew’s Hill Plantation is not located within the Order limits and is, therefore, not able to be managed via the <b>oLEMP [APP/7.11.2]</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Q11.0.5</b> | The applicant | <p><b>Landscape and visual cumulative effects assessment</b></p> <p>In addition to its explanation in ES Chapter 6 [APP-055], could the applicant provide further justification as to why it does not consider future development outside its 3km search area needs to be considered in the landscape and visual cumulative effects assessment relative to landscape character areas (local and national).</p>                                                                                           | <p><b>ES Chapter 6: Landscape and Visual [AS-016]</b> has considered the potential for cumulative effects beyond the 3km study area. Section 6.11 of <b>ES Chapter 6: Landscape and Visual [AS-016]</b> sets out the cumulative landscape and visual effects which may arise from the Scheme in-combination with other developments in the locality.</p> <p>The cumulative assessment has been undertaken in accordance with the Planning Inspectorate’s guidance to identify all the potential cumulative schemes. A Long List within a 25km search area was then further refined to a Short List to focus on those schemes which may give rise to significant cumulative effects. <b>ES Appendix 2.4: Cumulative Schemes [APP/6.4.1]</b> sets out the Long List and Short List of schemes in Table 2-3 which have been considered as part the assessment of cumulative landscape and visual effects. <b>ES Appendix 2.4: Cumulative Schemes [APP/6.4.1]</b> has been updated at Deadline 3 to update the Long and Short Lists.</p> <p>The rationale for the inclusion of other developments within the cumulative assessment has been based on professional judgement as to the likelihood of significant cumulative effects arising from the additionality of the Scheme, as informed by the ZTV, field observations and desk-based assessments. The discounted schemes in the Long List and Short List are considered to be of a nature and/or distance from the Order limits such that significant cumulative landscape and visual effects are unlikely to occur. The cumulative assessment sieving process is considered sufficiently detailed to inform the decision-making process.</p> <p>Given the cumulative shortlisting process which has been undertaken for the Scheme, the Applicant does not consider it necessary to consider the cumulative effects of the Scheme in-combination with other developments across the entire LCA, County or region, where character areas / types or cumulative schemes are not intervisible with each other or perceived in the same context, as they are unlikely to result in significant cumulative effects.</p> |

Table 2.12: Need, site selection and alternatives

| ExQ            | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Applicant’s Response                                                                                                                                                                                                                                          |
|----------------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Q12.0.1</b> | The applicant | <p><b>Choice of technology</b></p> <p>The Planning Statement [REP1-013], paragraph 8.2.25, refers to “<i>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology.</i>”</p> <p>Could the applicant signpost to specific paragraphs within ES Chapter 4 [APP-053], which describes the consideration of reasonable alternatives in relation to choice of technology.</p> | <p>The Applicant has updated <b>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1.1]</b> at Deadline 3 to further clarify the consideration of alternative technologies that are set out within the <b>Statement of Need [APP-042]</b>.</p> |



Table 2.13: Population

| ExQ            | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Q14.0.1</b> | The applicant | <p><b>Planning balance – permissive paths</b></p> <p>Paragraph 9.4.8 of the Planning Statement [APP-043] states that the PRoW should be afforded moderate positive weight in the planning balance.</p> <ol style="list-style-type: none"> <li>Could the applicant provide further detailed information with specific references to the ES to support its weighting.</li> <li>Does the weighting take account of the view raised below by BDC in its LIR [REP1-079] paragraph 2.18, that: <i>“The Applicant proposes permissive paths and enhancements to the access network. While these measures provide public benefit, they do not alter the fact that the Scheme would materially change the experience of moving through this part of the Breckland landscape.”</i></li> <li>Does the weighting include the new permissive paths outside of the Order limits?</li> </ol> | <ol style="list-style-type: none"> <li>As outlined within <b>ES Chapter 6: Landscape and Visual [AS-016]</b>, a number of new permissive routes are proposed across the Site, which would link to the existing PRoW network within the study area to provide recreational benefits. Details with regards to the on-Site permissive paths are shown on Appendix 1 – Green Infrastructure Parameter Plans to the <b>oLEMP [APP/7.11.2]</b> and <b>outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP-192]</b>. These documents are secured via Requirements 7 and 16 respectively of the <b>draft DCO [APP/3.1.3]</b>. It is also of note that within <b>ES Chapter 9: Transport and Access [REP1-036]</b>, there are no residual significant adverse effects anticipated on the existing PRoW network from a transport perspective.</li> </ol> <p>The Applicant notes that when referring to PRoW within paragraph 9.4.8 of the <b>Planning Statement [REP1-012]</b>, it is referring to permissive paths within the Order limits as well as PRoW, and these (together) should be afforded moderate positive weight in the planning balance. Furthermore, given the recreational benefits of the new permissive paths within the Order limits, as well as the lack of significant effects on existing PRoW in terms of connectivity identified within the Environmental Statement, it is considered that moderate positive weight is an appropriate weighting against, in particular, paragraphs 2.10.40 to 2.10.45 of NPS EN-3 (2023).</p> <ol style="list-style-type: none"> <li>The consideration of the experience of PRoW and permissive path uses and the weighting of these impacts is addressed through the landscape and visual impacts (as set out in <b>ES Chapter 6: Landscape and Visual [AS-016]</b>), in respect of which it is considered that there should be moderate negative weight in the planning balance. However, this does not mean that the conclusion in (i) above is changed where it concludes moderate positive weight as that weighting conclusion and the conclusion drawn here should be considered unique to one another. The permissive paths outside of the Order limits are not included within the weighting of paragraph 9.4.8 of the <b>Planning Statement [REP1-012]</b>, as they are not secured by the DCO Application.</li> </ol> |

Table 2.14: Transport and access

| ExQ            | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Q15.0.1</b> | The applicant | <p><b>Deer fencing design</b></p> <p>Further to the applicant’s response to ExQ1 Q15.0.5 [REP1-069], could the applicant provide further detail to support its response that <i>“it is considered that any concerns about deer collisions would be mitigated appropriately through the alignment of any deer fencing, which would be strategically placed to secure routes that avoid directing deer towards roads and the A1065”</i>. In particular, please provide reference to details of deer fencing design, to include alignment, within the ES or other documents and how this would be secured in the dDCO.</p> | <p>The Applicant makes note of the concerns regarding traffic collisions associated with deer. However, it is noted that a review of collision data is provided for within <b>ES Appendix 9.2: Traffic Assessment [APP-163]</b>, which identifies that there are no apparent highway safety issues within the study area along the A1065 and around the Scheme that would suggest an increased propensity for any collisions to occur, particularly those associated with deer.</p> <p>The alignment of the fencing surrounding the Solar PV Arrays is illustrated on the Green Infrastructure Strategy Plans which are appended to the <b>oLEMP [APP/7.11.2]</b> (which, in turn, is secured via Requirement 7 of the <b>draft DCO [APP/3.1.3]</b>). The Applicant has also updated the <b>Design Principles, Parameters and Commitments [APP/5.8.3]</b> (a certified document under Schedule 13 of the <b>draft DCO [APP/3.1.3]</b>) at Deadline 3 to secure this measure along the A1065. The <b>Design Principles, Parameters and Commitments [APP/5.8.3]</b> commit the deer fencing to be offset by 8-10m from the hedgerows that run parallel to the A1065 and west away from the A1065. This will allow deer to move east west through the Site and away from the A1065, instead of channeling deer north south along the A1065 until they reach the northern and southern extents of the Site.</p> |

**Table 2.15: Other Planning Matters**

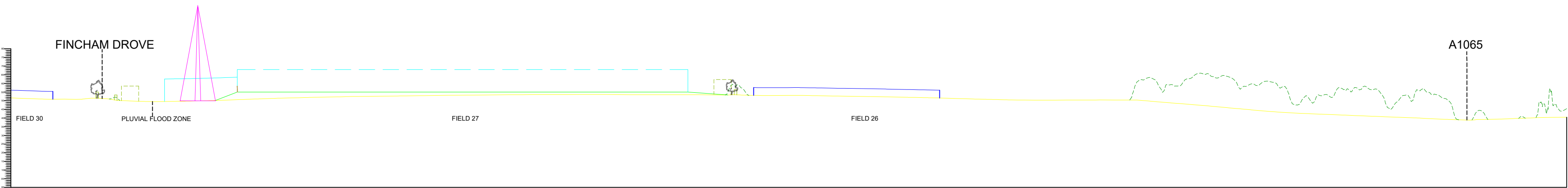
| ExQ            | Respondent    | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Applicant’s Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Q16.0.1</b> | The applicant | <p><b>Natural England’s standard advice on air quality</b></p> <p>Table 4.2, SoCG – Natural England [REP1-092] notes that for International and National Designated Sites that the status is agreed but Natural England’s standard advice on air quality should be considered. In addition to the applicant’s response to WRs and other D1 submissions [REP2-028], item NE1-2, could the applicant comment specifically on whether Natural England’s standard advice has been considered?</p> | <p>In line with Natural England’s standing advice, the screening steps were undertaken in order to assess whether the Scheme would have an effect on the air quality of protected sites. This included checking if emissions would reach protected sites, checking relevant ‘critical loads’ and ‘critical levels’, and considering the Scheme in combination with other projects. The details of these assessments can be found within <b>ES Chapter 7: Ecology and Biodiversity [APP/6.2.2]</b> at paragraphs: 7.5.2, 7.5.11 (first bullet), 7.8.6, 7.8.8, 7.8.12, 7.8.15, 7.8.17, 7.8.22, 7.8.26, 7.8.29, 7.8.72, 7.8.78, 7.8.110, 7.8.114, 7.8.116, 7.8.119, 7.9.121, 7.8.130, 7.8.132, 7.11.14, 7.11.18, and within Table 7-12, and within the shadow Habitats Regulations Assessment (<b>Shadow Habitats Regulations Assessment [AS-057]</b>).</p> |



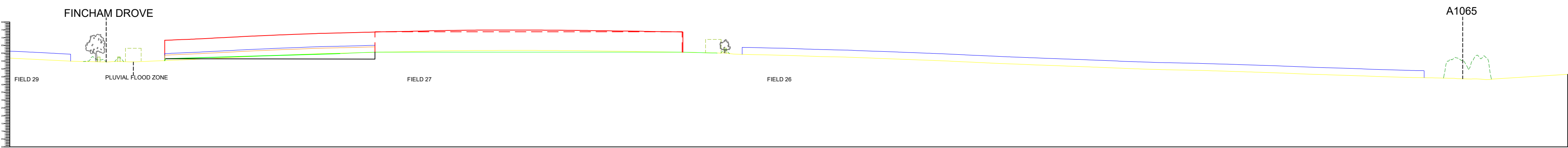
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## Appendix 1: Field 24 & 27 Cross-Sections

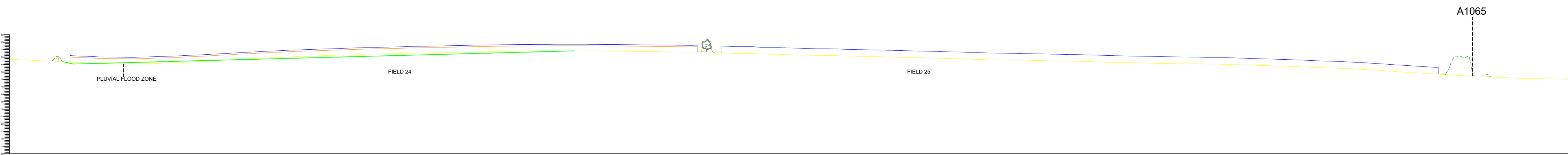
Z:\9485\_KINGS\_LYNN\_SOLAR\_PARK\CA\DRAWINGS\EXAMINATION\UPDATES\13\_SECTIONS\9485\_A\_SECTIONS.DWG



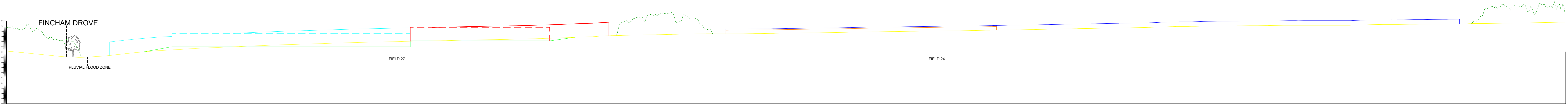
SECTION AA



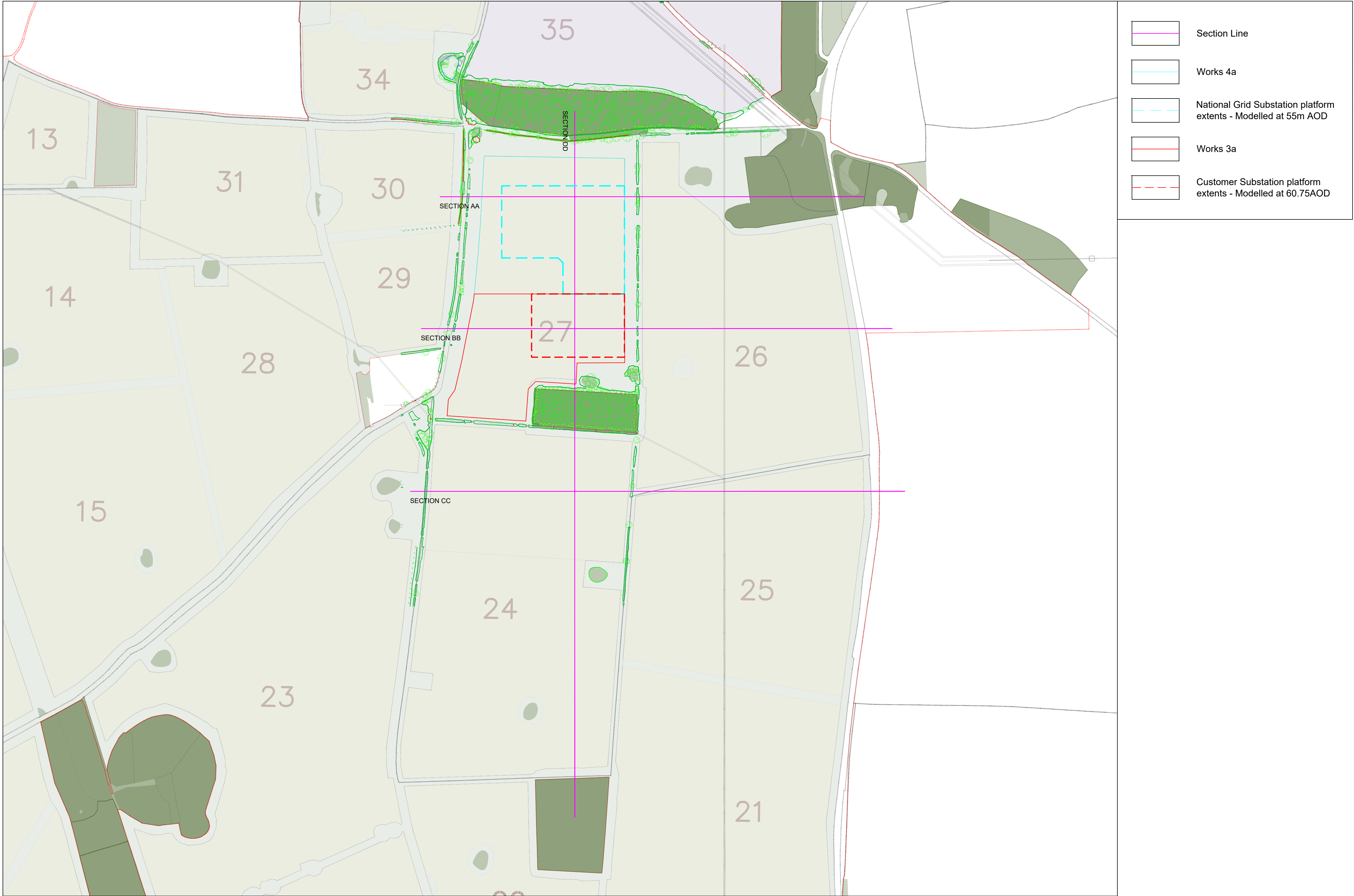
SECTION BB



SECTION CC



SECTION DD



| DRAWING TITLE:               |                                                            |
|------------------------------|------------------------------------------------------------|
| Field 24 & 27 cross-sections |                                                            |
| DOCUMENT:                    |                                                            |
|                              |                                                            |
| LEGEND:                      |                                                            |
|                              | Existing ground level                                      |
|                              | Indicative proposed ground level                           |
|                              | National Grid Substation - 13m above existing ground level |
|                              | National Grid Substation - 68m AOD parameter               |
|                              | Customer Substation - 13m above existing ground level      |
|                              | Customer Substation - 73.75m AOD parameter                 |
|                              | BESS - 3.5m above existing ground level parameter          |
|                              | Solar Panel - 4.5m above existing ground level parameter   |
|                              | Pylon - 55m height above existing ground level parameter   |
|                              | Existing vegetation                                        |
|                              | Proposed tree belt planting height at year 15              |
|                              | Existing and proposed hedgerows height at 3.5m             |



**THE DROVES**  
SOLAR FARM