THE DROVES
SOLAR FARM

# The Droves Solar Farm

## Applicant's Response to Deadline 3 Submissions

Prepared by: DWD
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# Contents

# 1. Introduction

## 1.1. Purpose of the Document

1.1.1. This document has been prepared on behalf of The Droves Solar Farm Limited (the Applicant) in relation to an application (the DCO Application) for a Development Consent Order (DCO) to be made to the Secretary of State (SoS) to construct, operate and maintain, and decommission The Droves Solar Farm (the Scheme), pursuant to the Planning Act 2008 (PA 2008).

1.1.2. This document provides the Applicant's response to representations submitted to the Examining Authority (the ExA) at Deadline 3 of the Examination of the DCO Application.

1.1.3. A total of 14 documents were submitted at Deadline 3 by Interested Parties. All submissions were published on the Planning Inspectorate's website on 28 July 2026. On 12 August 2026, a project update was published notifying that the ExA had accepted an additional submission from National Highways. The Applicant considers this update to reflect National Highways' Deadline 3 submission **[REP3-096]**.

1.1.4. Where paragraphs or sections of the above submissions have not been included, this has been done where the Applicant does not have any commentary to make on the text provided. This is done only for passages where submissions refer to factual statements, make repetition of text from the Applicant's documents, or where there is direct quoting of local policy or guidance to which the Applicant has already responded to within the DCO Application documents.

1.1.5. Where topics have been raised at Issue Specific Hearing 2 (ISH2), Issue Specific Hearing 3 (ISH3), Compulsory Acquisition Hearing 1 (CAH1) or Open Floor Hearing 2 (OFH2) (held on 8 and 9 September 2026), summaries of oral submissions and the Applicant's responses to Action Points can be found in:

- **Written Summary of Applicant's Oral Submissions and Responses to Action Points at ISH2 and ISH3 [APP/8.22]**
- **Written Summary of Applicant's Oral Submissions and Responses to Action Points at CAH1 [APP/8.23]**; and
- **Written Summary of Applicant's Oral Submissions at OFH2 [APP/8.24]**.

## 1.2. Structure and Scope of the Report

1.2.1. This document provides a response from the Applicant to the matters raised at Deadline 3 and is structured as follows:

- **Section 2** presents the submissions by the local authorities and are responded to in full by the Applicant
- **Section 3** presents the submissions by prescribed bodies and are responded to in full by the Applicant; and
- **Section 4** presents the submissions by members of the public and are responded to in full by the Applicant.

1.2.2. **Table 1-1** provides a breakdown of the scope of this document and details where a Deadline 3 submission, if relevant, has been responded to.

## Table 1-1: Table of Deadline 3 submissions, as organised by the sections of this document

| Deadline 3 Submission Reference | Responded to in this document? | Reason |
|---|---|---|
| **Section 2** | | |
| Breckland District Council (Responses to ExQ2) [REP3-092] | No | The Applicant does not have any comments to make on this submission. |
| Breckland District Council (Responses to ExQ2) [REP3-090] | Yes | The Applicant wishes to respond to points made in this submission. |
| Borough Council of King's Lynn and West Norfolk (Comments on the Deadline 2 submissions and any other information requested by the ExA for Deadline 4) [REP3-100] | Yes | The Applicant wishes to respond to points made in this submission. |
| Borough Council of Kings Lynn and West Norfolk (Responses to ExQ2) [REP3-089] | No | The Applicant does not have any comments to make on this submission. |
| Norfolk County Council (Responses to ExQ2) [REP3-091] | Yes | The Applicant wishes to respond to points made in this submission. |
| Castle Acre Parish Council (Responses to ExQ2) [REP3-097] | Yes | The Applicant wishes to respond to points made in this submission. |
| **Section 3** | | |
| Environment Agency (Responses to ExQ2) [REP3-095] | Yes | The Applicant wishes to respond to points made in this submission. |

| | | |
|---|---|---|
| Environment Agency (Comments on the Deadline 2 submissions and any other information requested by the ExA for Deadline 5) **[REP3-101]** | Yes | The Applicant wishes to respond to points made in this submission. |
| National Highways (Responses to ExQ2) **[REP3-096]** | Yes | The Applicant wishes to respond to points made in this submission. |
| National Grid Electricity Transmission plc (Responses to ExQ2) **[REP3-094]** | No | The Applicant does not have any comments to make on this submission. |
| Natural England (Responses to ExQ2) **[REP3-093]** | No | The Applicant does not have any comments to make on this submission. |
| **Section 4** | | |
| Antony Morgan (Responses to ExQ2) **[REP3-098]** | Yes | The Applicant wishes to respond to points made in this submission. |
| Sharron Morgan (Comments on the Deadline 2 submissions and any other information requested by the ExA for Deadline 5) **[REP3-102]** | Yes | The Applicant wishes to respond to points made in this submission. |
| Dr. Mark Holmes (Comments on the Deadline 2 submissions and any other information requested by the ExA for Deadline 3) **[REP3-099]** | Yes | The Applicant wishes to respond to points made in this submission. |

# 2. The Applicant's responses to Host and Neighbouring Local Authorities

| Reference | Comments | Applicant's Response |
|---|---|---|
| **Borough Council of Kings Lynn and West Norfolk (Comments on the Deadline 2 submissions and any other information requested by the ExA for Deadline 4) [REP3-100]** | | |
| BCKLWN1 | **APP/8.12 - Applicant's Response to Local Impact Reports (LIR) BCKLWN 34-35**<br>*Summary of issue*<br>The Applicant has responded to the BCKLWN LIR points 5.1.1 and 5.3.1-5.3.3 on contaminated land and confirmed agreement.<br>*Comments*<br>Comment 5.1.2 appears to refer to air quality and may belong in section BCKLWN38. | The Applicant ordered points from the Local Impact Reports (LIR) in chronological order; therefore, 5.1.2 was grouped with 5.1.1 in row BKLWN34 of the **Applicant's Response to Local Impact Reports [REP2-027]**. The Applicant notes that there is nothing further to respond to on this point, and that more detailed comments on air quality are included in row BKLWN36 of that document. |
| BCKLWN2 | **APP/8.12 - Applicant's Response to Local Impact Reports (LIR) - BKLWN36-37**<br>*Summary of issue*<br>The Applicant has responded to the BCKLWN LIR points 5.4.2 to 5.4.5 that related to construction dust risks and monitoring. The Applicant has confirmed in APP/8.12 that this is agreed and will be discussed with relevant local authorities as needed.<br>*Comments*<br>The Applicant has confirmed in APP/8.12 that this is agreed and will be discussed with relevant LAs as needed. However, Appendix 1 of the oCEMP (APP/7.6.2 (Revision 2)) previously included the dust assessment and mitigation measures as referred to in the Applicant's response to the LIR and this has been removed from the most recent version of the document. This should be re-instated within the oCEMP. | The Construction and Decommissioning Phase Dust Assessment has been reinstated as **Appendix 1** within the **outline Construction Environmental Management Plan (oCEMP) [APP/7.6.4]** submitted at Deadline 3. |
| BCKLWN3 | **APP/8.12 - Applicant's Response to Local Impact Reports (LIR) - BKLWN23**<br>*Summary of issue*<br>The Council acknowledge an excel version of the BNG metric provided directly from the Applicants as referenced in their LIR response.<br>*Comments*<br>There are two inputs within the Onsite Habitat Enhancement (Tab A-3) six inputted as Formally Identified in Local Strategy. It is not agreed that Cell E23 (Habitat Ref W22a) Formally Identified in Local Strategy for the habitat enhancement proposed. This area is covered by a polygon for Still Water Restoration rather than woodland measures. | The Applicant has reviewed the Biodiversity Net Gain (BNG) metric and agrees that there is an error in respect of Habitat Ref W22a. As such, the **Biodiversity Net Gain Assessment Report [APP/7.4.2]** and BNG metric have been updated at Deadline 4 to correct this error. The Applicant can confirm that this change has not significantly affected the outcome of the BNG Assessment and that the magnitude of BNG gains will remain above 20%. |

| Reference | Comments | Applicant's Response |
|---|---|---|
| BCKLWN4 | REP1-052/053 - 7.7.1 outline Construction Traffic Management Plan (Clean)/(Tracked)<br>*Summary of issue*<br>In our response to Deadline 1 Submissions (REP2-030), the Council made specific comments in relation to the travel plan, stating that consideration is given to shuttle bus trips being made via electric vehicles. We have yet to receive a response.<br>*Comments*<br>BCKLWN Request a response from the Applicants. | The Travel Plan that forms **Appendix 1** to the **outline Construction Traffic Management Plan (oCTMP) [AS-082]** that was updated at Deadline 3 included a commitment to investigating the use of an electric shuttle service for construction within section 4.2 of the document. |
| **Breckland District Council (Responses to ExQ2) [REP3-090] [REP3-092]** | | |
| BC1 | **ExQ2 Q7.4.2 Response**<br>Norfolk County Council is not "the relevant planning authority" for the DCO. Applications for the discharge of requirements would be submitted to, and determined by, Breckland District Council. However, the Council considers that Norfolk County Council should be expressly named as a consultee in Requirement 11 in its capacity as Lead Local Flood Authority.<br>The applicant's response [REP1-074] to ExQ1 Q7.5.4 [REP1-086] states that it is not necessary to directly name the LLFA directly. However, given that the protective provisions in Part 7 of Schedule 15 of the draft DCO [APP/3.1.1] already require the submission of plans relating to works proximate to drainage works or ordinary watercourses to the LLFA, the Council considers that an express consultation requirement would provide helpful clarity and would assist the effective discharge of Requirement 11.<br>The Council's concern is a practical one. In its experience, it can be difficult to secure timely consultee comments where the consultee is not expressly identified in the relevant requirement. The Council does not hold the specialist drainage expertise necessary to assess such matters independently without LLFA advice. | As set out in the **Applicant's Response to ExQ1 [REP1-069]**, the Applicant agrees that Requirement 11 of Schedule 2 of the **draft Development Consent Order (DCO) [APP/3.1.4]** requires the Applicant to submit *"to the relevant planning authority"* (i.e. Breckland Council) the written details of the surface water drainage scheme and (if any) foul water drainage system.<br>Breckland Council is entitled to consult with any other organisation if they deem it necessary to do so, as part of its approval of this surface water drainage scheme – this can include Norfolk County Council in its role as the Lead Local Flood Authority.<br>Breckland Council's point, that protective provisions in Part 6 of Schedule 15 of the **draft DCO [APP/3.1.4]** require the Applicant to submit plans relating to any works proximate to any drainage work or ordinary watercourse for approval, is precisely the reason why Requirement 11 of Schedule 2 does not need updating in the manner proposed by Breckland Council. This would simply duplicate an existing commitment in the **draft DCO [APP/3.1.4]** and is unnecessary. |
| BC2 | **ExQ2 Q10.0.3 Response**<br>The Council is supportive of the principle of an environmental risk assessment for any buried cables proposed to be left in situ and implementation of the Best Practicable Environmental Option.<br>(…)<br>However, the Council considers that the acceptability of this approach will depend on whether the long-term use of the land, including agricultural use, would be materially constrained, and whether any future constraints are capable of being adequately managed and secured through the decommissioning process. (…) | The Applicant welcomes Breckland Council's support of an environmental risk assessment being undertaken. As set out in the **outline Decommissioning Strategy (oDS) [REP3-067]**, the mode of removing the cabling would be dependent upon government policy and good practice at that time which would encompass consideration of government agricultural policy and best practices. |
| BC3 | **ExQ2 Q11.0.6 Response** | As set out in the **Applicant's Response to ExQ1 [REP1-069]**, it is common practice that only the most significant works require details to be submitted and approved by the relevant planning authority – the Applicant refers to the corresponding requirement in the Longfield Solar Park Order 2023, the Cottam Solar |

| Reference | Comments | Applicant's Response |
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| | (…) some additional detail would be welcomed to assist in further understanding.<br><br>The Council notes that paragraph 1.3.1 of the Design Principles, Parameters and Commitments document states that Tables 3.1 to 3.9 are secured by Requirement 5. However, Requirement 5 appears to apply only to Work Nos. 1, 2 and 3A and requires submitted details to accord only with Tables 3-1, 3-2 and 3-3, as applicable.<br><br>The Council therefore seeks clarification as to the mechanism by which the parameters and commitments in table 3-4 (National Grid Substation), table 3-5 (pylons, overhead lines etc), table 3-6 (cabling), table 3-8 (access points - Req 5 only requires details of access points for Work Nos. 1, 2 and 3a) are secured, discharged and enforced. It is noted that tables 3-7 (construction and decommissioning compounds) and 3-9 (permissive paths) are secured via alternative draft DCO requirements. | Project Order 2024, the West Burton Solar Project Order 2025 and the Tillbridge Solar Order 2025 for examples of this approach being accepted. Further, the Applicant notes that some of the works, including in relation to landscaping, fencing and drainage, are already addressed by corresponding Requirements in Schedule 2 of the **draft DCO [APP/3.1.4]** (see Requirements 7, 10 and 11 respectively), meaning there is no need to duplicate the provisions by referring to Requirement 5 in this regard. The Applicant also notes that the **Design Principles, Parameters and Commitments [APP/5.8.4]** contain details for all Work Nos., and the **oCEMP [APP/7.6.4]**, the **outline Operational Environmental Management Plan (oOEMP) [APP/7.8.4]** and the **oDS [REP3-067]** all reference these parameters which must be met by the Applicant and its contractors. |
| BC4 | **ExQ2 Q11.0.6 Response Cont.**<br><br>The Council considers that either Requirement 5, the Design Principles, Parameters and Commitments document, or another appropriate DCO mechanism should be amended or clarified to ensure consistency between the certified document and the operative requirements of the DCO.<br><br>Additionally, details of the proposed bund parameters would be helpful (max length, width, height). | For the reasons set out in the Applicant's response to **BC3** above, the Applicant does not propose to alter the drafting (which would mean departing from well-precedented wording) of the **draft DCO [APP/3.1.4]** in this regard, nor does it currently consider that the **Design Principles, Parameters and Commitments [APP/5.8.4]** require any further updates at this time (further to updates made at Deadline 3).<br><br>The mechanisms in the **draft DCO [APP/3.1.4]** provide precedented and clear procedures under which the relevant detailed design matters are secured and approved at the appropriate stage.<br><br>In relation to Breckland Council's comment regarding bund parameters, the Applicant remains in helpful discussions with the Ministry of Defence (MOD) regarding potential mitigation solutions for the impact on Precision Approach Radar (PAR). Following the conclusions of these discussions (i.e. once an agreed mitigation solution has been decided upon between the parties) the Applicant will update the **Design Principles, Parameters and Commitments [APP/5.8.4]** (where necessary) to reflect this agreed approach. |
| BC5 | **ExQ2 Q11.0.7 Response**<br><br>[The Breckland Landscape Character Assessment (May 2007)] is nearly 20 years old and, while it does make reference to the capacity of the landscape to accommodate wind turbines, it does not make reference to the capacity of the landscape to accommodate solar farms along with other energy infrastructure projects. Since the publication of this document a number of substantial solar/energy developments have been built or have been consented within the district and the wider county area. The Council would expect some further work/analysis of the landscape to be undertaken by the applicant to understand the changes in the landscape since the 2007 assessment.<br><br>While existing and consented schemes are considered to be part of the baseline, the landscape only has so much capacity to absorb further developments of this nature before giving rise to significant adverse effects on a wider area. As such, developments of this nature, taken together with those already in existence, cumulatively affect the character of the area.<br><br>(…) | The Applicant has provided a cumulative landscape and visual assessment within Section 6.11 of **ES Chapter 6: Landscape and Visual [AS-016]**. The cumulative assessment has been undertaken in accordance with the Planning Inspectorate's Guidance on cumulative assessment[1]. **ES Appendix 2.4: Cumulative Schemes [REP3-063]** identifies all the potential cumulative schemes as a Long List within a 25km search area, which was then further refined to a Short List to focus on those schemes which are likely to give rise to significant cumulative landscape and visual effects.<br><br>Table 2-3 of **ES Appendix 2.4: Cumulative Schemes [REP3-063]** sets out the Long List and Short List of schemes which have been considered as part the cumulative assessment. The criteria for establishing the Long List and Short List of cumulative schemes is set out within paragraphs 2.4.1 to 2.4.9 of **ES Appendix 2.4: Cumulative Schemes [REP3-063]**. All schemes that are existing, operational and under construction are treated as part of the baseline condition.<br><br>The rationale for the inclusion of the other schemes within the cumulative landscape and visual assessment was based on professional judgement as to the likelihood of significant cumulative effects informed by the Zone of Theoretical Visibility (ZTV) for the Scheme, as well as desk-based assessments and field observations. As outlined in paragraphs 6.9.2 and 6.9.8 of **ES Chapter 6: Landscape and Visual [AS-016],** the discounted schemes in the Long List and Short List were judged to be of a nature and/or distance from |

[1] Planning Inspectorate's Guidance, Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment

| Reference | Comments | Applicant's Response |
|---|---|---|
| | The Council considers that there should be an assessment of the cumulative effects of energy infrastructure in relation to the following Breckland Landscape Character Areas:<br>• D1 - Swaffham Heath; and<br>• E6 - North Pickenham Plateau | the Site 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.<br><br>Best practice guidance within Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) advises in:<br>• Paragraph 7.3 (bullet one) that cumulative effects are *"the additional changes caused by a proposed development in conjunction with other similar developments."* (our emphasis)<br>• Paragraph 7.5 that *"the challenge is to keep the task reasonable and in proportion to the nature of the project under consideration. Common sense has an important part to play in reaching agreement about the scope of the assessment."* (our emphasis)<br><br>Section 6.11 of **ES Chapter 6: Landscape and Visual [AS-016]** provides a proportionate assessment of cumulative landscape and visual effects, including a sieving process and review of the **ES Appendix 2.4: Cumulative Schemes [REP3-063]** within the Long List and Short List in Table 2-3. **ES Chapter 6: Landscape and Visual [AS-016]** has assessed the cumulative effects on the published LCAs as requested by Breckland Council. As advised by best practice, the cumulative landscape and visual assessment has focused on the likely significant effects in relation to the additionality of the proposed Scheme. In this respect, the High Grove Solar DCO was the only scheme considered to potentially give rise to significant cumulative effects.<br><br>Potential significant cumulative effects in relation to the High Grove Solar DCO to the south-east of the Site have been identified within Section 6.11 of **ES Chapter 6: Landscape and Visual [AS-016]**. The assessment concludes:<br>• Significant adverse landscape effects during the construction and operation (short and long term) stages on the E6 North Pickenham Plateau LCA; and<br>• Significant adverse visual effects during the construction stage for receptors within Visual Receptor Group 4: Great Palgrave and Little Palgrave.<br><br>LCA D1 Swaffham Heath was scoped into the LVIA and cumulative assessment. When taking account of High Grove Solar Farm, there would be no potentially significant cumulative landscape effects upon LCA D1 Swaffham Heath.<br><br>Although the schemes are located adjacent to each other, the proposed Solar PV Arrays within both projects appear set back from the field boundaries and roadside hedges. The proposed Solar PV Arrays are similarly compartmentalised and subdivided by their respective field boundary hedges, tree shelterbelts and woodland blocks. Opportunities to observe both projects together on the ground would be restricted within sequential or in succession views when travelling along the A1065 and West Acre Road between the two projects. Where the projects are visible in-combination from the higher ground to the east at Representative Viewpoint 8 on the South Acre Road, for example, only a proportion of both projects would be visible within the same field of view.<br><br>The Applicant does not consider it appropriate to consider the cumulative effects across the entire LCA where the Scheme is not intervisible with the other developments or perceived in the same landscape character context. Sequential or in-succession views of the Scheme with other solar developments when travelling over long distances are unlikely to give rise to perceptible cumulative effects, as there would be distant separation between the other developments in the wider area. |

| Reference | Comments | Applicant's Response |
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| BC6 | **ExQ2 Q11.0.7 Response Cont.**<br><br>The Council considers that there should be an assessment of any areas where the Zone of Theoretical Visibility (ZTV) studies of proposed or existing solar farms intersect with the ZTV for the application site in order to assist in the assessment of cumulative visual effects. | The Applicant has provided a cumulative landscape and visual assessment within Section 6.11 of **ES Chapter 6: Landscape and Visual [AS-016]**. The ZTV studies have their limitations as a 'binary' visible or not visible model. The ZTV studies do not account for local variations in visual screening provided by woodland, hedges or individual trees or provide an indication of the extent of the development which may be visible for any particular viewpoint.<br><br>With regards to the provision of cumulative ZTVs, paragraph 7.31 of GLVIA3 advises that:<br><br>*"The initial study area may include overlapping ZTV's of all the relevant projects. This approach has been particularly important in assessing wind farms, which can be visible over considerable distances…and so the study areas for the cumulative effects can be very extensive. This may not necessarily be the case for other forms of development."* (our emphasis)<br><br>The proposed Solar PV Arrays are of a lower visual profile compared to other forms of renewable development, such as wind turbines, and due to the visual containment provided by landform, hedges and woodland, the ZTVs are typically less extensive or aligned with the actual extent of visibility. For these reasons, the provision of overlapping ZTVs of the Scheme with the High Grove Solar DCO are not considered necessary to provide a greater understanding of the cumulative effects when travelling through the landscape. |
| BC7 | **ExQ2 Q11.0.8**<br><br>The Council considers that the following views have been underplayed:<br><br>Views along the A1065 (slight effect in the short term/slight-minimal in the long term) (…)<br><br>Viewpoint Group 1 (within the site) (Major-Moderate to Moderate (significant) in the short term/moderate in the long term)<br><br>Viewpoint Group 2 (within the site) (Major-Moderate (significant) in the short term/moderate in the long term)<br><br>The Council considers that the significant visual effects experienced within and in the immediate vicinity of the application site would remain significant adverse in the long term (…)<br><br>While the Council acknowledges the ecological benefits of restoring these hedgerows and, should the development come forward, would welcome the screening function they would provide, it considers, nonetheless, that the loss of these open, panoramic views which characterise the area, has not been fully accounted for and thus the effects have been underplayed. | The Applicant does not consider that the assessment has underplayed any assessment related to views.<br><br>Additional assessment at the request of Breckland Council is included within **Technical Information Note - Landscape and Visual [REP3-083]**.<br><br>The overall effect on the A1065 is detailed in Section 6.8 of **ES Chapter 6: Landscape and Visual [AS-016]**, taking account of motorists travelling between using the A1065 between Swaffham and Castle Acre. Advance planting has been implemented along the A1065 roadside to provide visual screening along gappy or defunct sections of hedge which historically would have been dense and enclosed. The proposed Solar PV Arrays would be visible within transient and intermittent views from motorists travelling along the A1065 on what is considered to be a low sensitivity receptor. On balance, the effects on the A1065 would be medium-small scale over a limited extent resulting in low-negligible magnitude and a Slight-Minimal Adverse and Not Significant effect in the long term. Considering the offsets of the proposed Solar PV Arrays from the road, along with the advance planting already implemented and the mitigation measures outlined above, the Scheme would present a limited visual effect on the overall A1065 route in the long term.<br><br>The effects on Visual Receptor Group 1 covering the Solar PV Site itself are judged to be Major-Moderate Significant in the short-term and Moderate Not Significant in the long term. Visibility of the Solar PV panels would reduce in the long term from many of the visual receptors within the Site, including the Drove routes and existing PRoW, once the hedge gapping and embedded mitigation has established.<br><br>The effects on Visual Receptor Group 2 covering the Customer Substation, National Grid Substation and BESS are judged to be Major-Moderate Significant in the short-term and Moderate Not Significant in the long term. Similarly to Visual Receptor Group 1, visibility of the Grid Connection Infrastructure would reduce in the long term from many of the visual receptors within the Site, including the Drove routes and existing PRoW, once the hedge gapping and embedded mitigation has established.<br><br>The Applicant does not consider that "open, panoramic views", as suggested by Breckland Council, characterises all parts of the Site. There are some wider views in places, but in other locations views are foreshortened or channelled by local variation in landform, hedgerow, treebelts and woodland blocks. Open views to very distant horizons are relatively limited and would not be fully obstructed by the proposed Solar |

| Reference | Comments | Applicant's Response |
|---|---|---|
| | | PV Arrays which are set back from the Droves routes by a minimum distance of 25 metres and from PRoW by distance of approximately 15m. The proposed Solar PV Arrays would not appear at close proximity to these receptors and in many instances would be partially screened by an intervening hedge and/or located beyond a field margin of visually attractive wildflower meadow providing seasonal interest and biodiversity enrichment. |
| BC8 | **ExQ2 Q11.0.8 Cont.**<br><br>Viewpoint Group 4 V<br><br>RG 4 has been updated to include a new viewpoint (No 17) on PRoW Sporle and Palgrave BR2, Hungry Hill. The effect previously recorded for VRG4 was moderate slight in the long term (as a result of a low-negligible magnitude of impact). The notes on the Viewpoint 17 photograph record a medium-small scale of effect in the Short, Medium and Long term. In the absence of updated tables, the Council seeks clarification of the recorded results for this Viewpoint Group. | The Applicant clarifies no change to the assessment of Visual Receptor Group 4: Great Palgrave and Little Palgrave following the inclusion of Viewpoint 17. For Figure 6.16 Viewpoint 17 provided in **Appendix 1** of the **Technical Information Note - Landscape and Visual [REP3-083]**, the scale of effects in the short, medium and long term would be Medium-Small. |
| BC9 | **ExQ2 Q11.0.10**<br><br>ii) concern regarding cumulative impacts<br><br>In relation to cumulative impacts, dwelling receptor 20 is the only property identified as falling within the cumulative effects area. Whilst the Council notes that the effects would not be observed at the same time and from the same windows, the resident may potentially be affected more frequently and from more areas of their home. The Council therefore welcomes the proposal for further work on panel configurations to complete geometric modelling of the impacts. | There is currently insufficient information available regarding High Grove Solar to determine the extent of any cumulative impact. Currently, it is only possible to confirm that there is a potential for cumulative impacts based on dwelling receptor 20 having views of both solar projects. If further information is released regarding High Grove Solar, it may be possible to revisit this and accurately determine whether there is the potential for the resident to be affected by both projects, and if so whether this could affect the overall level of impact upon this dwelling receptor. |
| BC10 | **ExQ2 Q11.0.10 Cont.**<br><br>iii) complaints procedure<br><br>Given the lack of site survey discussed in ExQ1 Q11.0.5, part i), and the fact that residual effects have not been entirely ruled out for aforementioned dwelling receptor 20 (Q11.0.5, part ii), the Council strongly considers that a glint and glare complaints procedure must be secured. | Section 2.17 'Public Consultation and Liaison' of the **oOEMP [APP/7.8.4]** includes details of the process which would be put in place to ensure community concerns are heard, responded to and suitably addressed throughout the duration of the Scheme's operational phase. Any concerns or complaints, including those relating to glint and glare, can be raised through this process. |
| **Castle Acre Parish Council (Responses to ExQ2) [REP3-097]** | | |
| CAPC1 | **Q1.0.2 General and cross topic- Human Health**<br><br>Looking at the Applicant's document Chapter 15 Human Health, I would request more detail on their statements. The document emphasises how the scheme would provide training and jobs to help improve health and wellbeing. I would request the Applicant provides actual numbers on how many additional local people will actually gain employment or apprenticeship from this scheme, and for what duration, so that positive impact on the local population can be gauged. | **ES Chapter 15: Human Health [REP3-032]**, paragraph 15.8.4, states that between 155 and 310 construction jobs per annum are expected to be taken up by residents within the Labour Catchment Area during the construction period, which will be up to 24 months. During operation, the Scheme will support a limited number of employment opportunities, including operation and maintenance crews, technical professionals, landscaping staff and occasional repair teams over the 60-year period. Decommissioning is anticipated to commence in 2093 and last up to 24 months and is expected to require a smaller workforce than construction, estimated at approximately 75–80% of the peak construction workforce.<br><br>In relation to training and apprenticeships, paragraph 15.8.10 confirms that the **outline Employment, Skills and Supply Chain Strategy (oESSCS) [APP-195]** includes provision for apprenticeships, local employment, partnerships with schools and colleges, and site visits, although the |

| Reference | Comments | Applicant's Response |
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| | | specific number of apprenticeship opportunities would be confirmed through the detailed ESSCS (which is secured through a requirement of the DCO). |
| CAPC2 | **Q1.0.2 General and cross topic- Human Health Cont.**<br>Mental health is listed as part of health, but no further review or mitigation is offered in this document. I would ask the applicant to provide relevant research information on the effects on mental health of the loss of green spaces, more traffic, more noise over years of construction and operation.<br>In my opinion no compelling benefits for mental health are evident from the loss of the current landscape, so I wish to question how the Applicant can conclude in 15.9.1. that no significant adverse effects are identified after mitigation ( by some training and employment spots and PRoWs through an industrialised setting). | Mental health has been considered within **ES Chapter 15: Human Health [REP3-032]** through the relevant pathways by which the Scheme may influence health and wellbeing, including physical activity, access to PRoW, visual amenity, employment, and education, skills and training.<br>In relation to the concern regarding the loss of green space, the Site is not existing publicly accessible green space. It is primarily private agricultural land, with public access currently limited to the existing PRoW network. The assessment therefore does not identify the loss of publicly accessible recreational green space.<br>**ES Chapter 15: Human Health [REP3-032]** identifies that, during construction, there may be temporary adverse effects for some PRoW users arising from visual disturbance and, to a lesser extent, noise, dust and vibration where routes pass close to active works. However, no permanent extinguishment of PRoW is proposed, and any temporary closures or diversions would be limited and managed through the **oCEMP [APP/7.6.4]**. These effects are assessed as temporary and not significant.<br>During operation, access to existing PRoW would be retained and the Scheme would provide approximately 3.5km of new on-site permissive routes, together with associated recreational enhancements, which would improve access to land that is not currently publicly accessible as secured within the **outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP-192]** and **outline Landscape and Ecological Management Plan (oLEMP) [REP3-069]**.<br>**ES Chapter 15: Human Health [REP3-032]** also takes account of the findings of the technical assessments. The transport and noise assessments do not identify significant adverse effects and, accordingly, no significant adverse health effects are predicted through those pathways. The transport and noise assessments have been undertaken in accordance with relevant technical guidance and assessment criteria, which reflect established evidence regarding potential effects of environmental exposures.<br>For these reasons, the conclusion in paragraph 15.9.1 that no significant adverse residual effects on human health are identified after mitigation is considered robust. |
| CAPC3 | **Q1.0.2 General and cross topic- Human Health Cont.**<br>The Applicant mainly offers improving health by better provision of Public Rights of Way (PRoW), suggesting that this single activity would help raise local health indicators. But I would request that the Applicant provides written evidence of whether and how much PRoWs sited through or next to large fenced-in newly established solar farms have been of benefit elsewhere, compared to PRoW through intact countryside. Figures on what proportion of people actually engage in rambling to improve health are also required | The Applicant does not rely on PRoW improvements alone to demonstrate health benefits. **ES Chapter 15: Human Health [REP3-032]** considers a range of health pathways, including employment, education, skills and training, and physical activity.<br>In relation to PRoW, the assessment considers whether the Scheme would affect opportunities for walking and recreation, which are recognised determinants of physical and mental health. As set out in **ES Chapter 15: Human Health [REP3-032]**, there is established evidence of the relationship between access to PRoW and health outcomes, and a growing body of literature linking access to nature with positive mental health and wellbeing outcomes. This is also reflected in a survey commissioned by Living Streets, which found that 54% of people who walk reported doing so to improve their mental health and happiness.[2] Other commonly reported reasons for walking included getting fresh air (57%), getting more active (53%) and connecting with nature (28%).<br>The Site is not currently publicly accessible green space, other than the existing PRoW network. The Scheme would retain access to existing PRoW and provide approximately 3.5km of new on-site permissive routes, together with associated recreational enhancements. While some routes would experience a change in character, **ES Figure 6.8: Amenity and Recreation [APP-085]** concludes that overall access would not be adversely affected and some routes would be enhanced.<br>The assessment concludes proportionately that the Scheme would provide additional opportunities for walking and recreation, which are capable of giving rise to the beneficial effects identified. |

[2] Living Streets, 2024. Over half of Brits walk to improve their mental health

| Reference | Comments | Applicant's Response |
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| CAPC4 | **Q2 Aviation**<br>Being aware that the risk from solar farm glare etc to military aviation has not yet been resolved and may need consecutive adjustments, I would ask the Applicant to clarify how certain they can be to mitigate and avoid potential future air accidents or near misses as a consequence of siting a large solar farm in an area used by military aircraft. | The Applicant is currently in discussions with the MOD to determine how the risk of glare towards RAF Marham can be adequately mitigated. The Applicant is close to reaching an agreed position with the MOD regarding the requirement for a Glint and Glare Management Plan (GGMP) and will update the examination (including all Interested Parties) once available.<br>Similar plans have been adopted for other developments in the vicinity of military and civil aerodromes, including for Scruton Solar Farm, in the vicinity of RAF Leeming, and the Applicant is also aware of GGMPs which have been implemented for solar farms in the vicinity of Cardiff Airport and Norwich Airport. This is therefore a reliable and deliverable mechanism for safeguarding the operational requirements of aerodromes from significant glint and glare impacts. |
| CAPC5 | **Q6 Cultural heritage and archaeology**<br>[The Party references text in paragraph 8.5.5 of the Cultural Heritage Chapter of in the ES]<br>I wish to question the validity of these stated benefits listed, given that removal of fields from agricultural use in no way benefits the archaeology below these fields, as they are then filled up with steel and cement from the proposed construction projects. | Removal of land from arable regimes is recognised as being beneficial to below ground archaeological remains and is recognised by Historic England, who state:<br>*"The best way to protect a ploughed archaeological site is to remove it from cultivation. Instead of cultivation, consider putting it down to permanent grass or long-term, non-rotational set-aside. This can also help to reduce soil erosion and provide a wildlife habitat."* (https://historicengland.org.uk/advice/technical-advice/monuments-and-sites/management-of-archaeological-sites-on-arable-land/)<br>The below ground impact within the areas of panel arrays is very low, with the impact of piles typically ranging between 0.1% and 0.05% of the area. Cabling within the Solar PV Site will have a greater impact than piling, yet will still be relatively low, typically involving c.110m in length per hectare at widths of between 1.6m and 0.6m. Unlike piles, however, this impact will not be evenly spread and has potential to cause more localised impact. It should be noted that these impacts are by area and that archaeological remains are spread out within these areas, meaning that the actual impact upon the archaeology is even less. The ground that lies between these very localised impacts will be removed from arable cultivation for the operational lifespan of the project. Where below ground impacts will occur, these will be mitigated in accordance with the measures outlined in **ES Appendix 8.7: outline Archaeological Mitigation Strategy [REP2-016]**. |
| CAPC6 | **Q6 Cultural heritage and archaeology Cont.**<br>[The Party references text in paragraphs 8.6.44 and 8.6.45 of the Cultural Heritage Chapter of in the ES]<br>I question the validity of the second paragraph, given the many pages describing the very significant historic and archaeological importance of all the Castle Acre, South Acre, West Acre and Newton features, and the Castle Acre Conservation Area. The suggestion is made that the Applicant's proposal will have little if any effect on the multiple features of this area and its surroundings, a reason of historic significance and much valued by residents and visitors. | Paragraph 8.6.45 of **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** is concerned with Castle Acre Conservation Area and describes its setting in relation to visibility of the Order limits from the Conservation Area. The paragraph makes no comment regarding potential impacts of the Scheme. |
| CAPC7 | **Q6 Cultural heritage and archaeology Cont.**<br>[The Party references text in paragraph 8.6.93 of the Cultural Heritage Chapter of in the ES]<br>I wish to question the applicant whether this cannot be considered misleading, as if putting in a solar farm for 60 years were the better option for any archaeological preservation or future research, currently in open countryside. | Paragraph 8.6.93 of **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** makes no judgement upon whether remaining in agricultural use or under a solar farm would be better for the archaeological remains. The paragraph simply states the fact that arable cultivation results in a deterioration of archaeological remains and that is the likely scenario should the Scheme not proceed. |
| CAPC8 | **Q8 Flood risk, hydrology and water resources**<br>I have not seen any documents regarding the issues of low water levels and low water pressures that have become very common in Castle Acre and probably other areas surrounding the proposed site. The water requirements of | Section 7.3.34 of the **oLEMP [REP3-069]** outlines that all trees and shrubs will be regularly watered for a minimum of two growing seasons and as required thereafter to ensure successful establishment. There will |

| Reference | Comments | Applicant's Response |
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| | the proposed solar farm will be considerable and water levels are likely reduced since previous studies; we even have a hosepipe ban in place currently. I would like to get written assurance from the Applicant that their water will be sourced from outside Norfolk and that it will not affect other water levels elsewhere.<br>(…)<br>I would ask the Applicant to confirm that irrigation measures will be used where required to maintain healthy vegetation and that regular surveys and action would be taken to have a healthy hedge and tree population for the full duration of the project. | be ongoing monitoring of new planting and replacement of failures during the first two years of the operational phase.<br><br>Given the water use for arable crop irrigation will no longer be required when the Scheme is operational, it is anticipated that the water requirement for successful habitat establishment and maintenance will be similar to that of the baseline scenario. As such, there should be no perceptible difference in the availability of the groundwater resource.<br><br>Should more water be required than the 20 $m^3$/day there is a commitment within the **oCEMP [APP/7.6.4]** to tanker water from an area that is not deemed water stressed. |
| CAPC9 | **Q15 Transport and access**<br>I would ask the Applicant for evidence that the deer fencing is actually appropriate and effective in this area, given increasing numbers of deer and their unpredictable behaviour with roads, traffic and obstructions. I would envisage that there is a real risk of trapped deer on the road from fencing , even with some gaps, leading to more accidents and vehicle damage | The deer fencing would be set back 8m from the roadside hedge, as secured within the **Design Principles, Parameters and Commitments [APP/5.8.4]**. The Applicant has also committed that the *'deer fencing will be placed around each individual field (Fields 20, 21, 25 and 26) so as to not bisect the hedgerow boundaries and to allow for the continued free movement of deer along the existing hedgerows away from the A1065.'* The Applicant considers that these measures will ensure that deer are not 'trapped' on the A1065, as the strategy allows for deer to move along the boundary and through the Site. |
| **Norfolk County Council (Responses to ExQ2) [REP3-091]** | | |
| NCC1 | **ExQ2 Q5.0.4**<br>(…)<br>In general, the land identified is associated with public highways (including Public Rights of Way (PRoWs)), but NCC does not need to have an interest in the land to operate the highway and PRoWs because our operation of the public highway is on a statutory footing. We suggest that where land is within the public highway, the applicant likewise will not need to obtain an interest in land forming the public highway because it can rely on powers sought in the article 10(2) of the draft DCO. | The Applicant notes Norfolk County Council's position and remains in discussions with Norfolk County Council on the matter to satisfy all parties. The Applicant also notes that this matter relates to areas of land associated with public highways.<br>The Applicant identified plots 1-03, 2-22 and 2-23 as those within the public highway which it requires rights over to ensure that the associated works with these plots (Work Nos. 1(b), 1(d), 6 and 8(b)) can be carried out for the purpose of the construction, operation, maintenance and decommissioning of the Scheme without impediment.<br>The same applies for plots 2-12, 2-33, 2-34, 2-35, 4-46, 5-47, 5-49, 5-50, 5-51, 5-54, 5-55 and 5-56, which the Applicant has identified as those within the public highway which it requires temporary possession of to ensure the necessary works related to these plots (Work Nos. 4(c), 5(c), 5(d), 6, 8(a), 8(b) and 10) for the purpose of the construction of the Scheme without impediment.<br>As stated above, the Applicant has been seeking to acquire the relevant land, new rights and temporary use of land by voluntary agreement, in order to ensure implementation of the Scheme, but it does require these compulsory acquisition and temporary possession powers to be included in the DCO as a fallback position to ensure that the Scheme's progression, once consented, is unimpeded. |
| NCC2 | **ExQ2 Q7.4.3**<br>(…)<br>At present, the drainage strategy is not able to confirm where the proposed surface water drainage system would discharge due to a lack of information about the site conditions and it is not possible to determine whether the drainage is viable at this time. Therefore currently, it is not possible for the flood risk assessment to confirm that there is no increase in flood risk. | **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]** is unambiguous in the proposed strategy to drain the Scheme via infiltration. Further, infiltration testing presented in Table 3 of Annex B shows that 8 of the 9 locations tested showed 'Good' Drainage Characteristics, i.e. infiltration is possible and surface water can be managed in a sustainable way, for its lifetime, without increasing flood risk elsewhere. This is further supported by the trial pit records in **ES Appendix 8.6: Archaeological Trial Trenching Report [APP-160]**, where sandy / silty soils were observed in the majority of trial pits.<br>Annex C of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]** illustrates that, under a worst-case scenario in which Work Nos. 2 – 4 are assumed to be entirely impermeable, sufficient space is available to accommodate an infiltration basin of the required size within the Order limits. |
| NCC3 | **ExQ2 Q7.4.3 Cont.**<br>NCC notes that R11 of REP1-004 (dated June 2026, Rev 1) does not reference the NCC as a consultee. As the Environment Agency and Anglian Water do not | The Applicant refers to its response to **BC1** above for a full explanation of its position on this matter. |

| Reference | Comments | Applicant's Response |
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| | hold the responsibility of statutory consultee on surface water flood risk or the management of local flood risk associated with surface water flooding, they are not the appropriate bodies to comment on surface water flood risk and its management. Therefore, to ensure consistency with the national and local planning policies, the LLFA require that R11 includes reference to the NCC as a consultee. | |
| NCC4 | **ExQ2 Q7.4.3 Cont.**<br><br>NCC notes that there is no mention of the different phases of the proposed development in relation to the drainage system. At present, the current wording would require both the construction and operation phase drainage design is required prior to any site enabling works could begin. This approach is likely to delay the construction phase from starting as at present, the applicant is proposing to delay the data collection that the design is based upon until they have consent (should it be obtained). The data collection to inform the proposed drainage design could take between 3-12 months. (…) | The wording of Requirement 11 of the **draft DCO [APP/3.1.4]** represents standard practice across many consented solar DCOs, and the Applicant is content that there is sufficient time to discharge the Requirement following the detailed design of the Scheme. |
| NCC5 | **ExQ2 Q8.0.3**<br><br>A present, the filter drains, drainage ditches and swales are undefined in size. The applicant has undertaken some initial infiltration testing, although this is only in the area of the BESS and Substation platforms. These infiltration tests are not in the approximate locations of the where the access tracks are to be located. The applicant has undertaken preliminary calculations in the FRA for the sizing the attenuation basin that serves the BESS and / or National Grid Substation (although the calculations are not clear on which area is associated to which works). There are no preliminary calculations for a typical arrangement of operational access track. Therefore, it is not possible to determine where infiltration is viable across the whole site or where the alternative discharge location (Plan B) from these features is.<br><br>[Reference is made to the requirements of NPS EN-1 (paragraph 5.8.15)]<br><br>At present, the FRA and the proposed works descriptions are not clear on this and therefore, it is difficult for the scheme to include a suitable and consistent provision based upon this information. NCC as the LLFA, requests that some further evidence is provided to demonstrate the viability of the proposed approach as there is a gap in the preliminary design on this matter. | The Scheme has Work Nos. and does not have a detailed design at this stage, which is a standard approach across DCOs, such as Great North Road Biodiversity Park. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (as consented), and is secured by Requirement 11 of the **draft DCO [APP/3.1.4]**.<br><br>As outlined in paragraph 12.6.78 of **ES Chapter 12: Water Resources [APP/6.2.3]**, rainwater is anticipated to infiltrate rapidly, rather than generate substantial run-off. This was evident during the Site walkover in September 2025 where pooling of water was observed within compacted agricultural routes within the Core Study Area but not within the agricultural fields, which are free draining due to the high sand content of the overlying soils, as shown in Plate 12-10 and Plate 12-11. As such, the infiltration rates observed in the test locations in Work Nos. 2 – 4, as outlined in Table 3 of Annex B of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]**, described as 'Good' infiltration potential, are anticipated to be representative of the wider Order limits given the lithology is mostly homogenous, as shown within the trial pit records in **ES Appendix 8.6: Archaeological Trial Trenching Report [APP-160]**, where sandy / silty soils were observed in the majority of trial pits. Additionally, the absence of surface water drainage features within the Order limits also supports the conclusion that the Site is free draining and therefore the proposed use of swales, filter drains and ditches to drain access track is appropriate, given the free draining nature of the Site.<br><br>Paragraph 12.1.24 of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]** simply references the requirements of NPS EN-1 (paragraph 5.8.15). |
| NCC6 | **ExQ2 Q8.0.4**<br><br>In relation to the ephemeral watercourses, the applicant has not provided evidence to demonstrate that a watercourse tracing investigation has been undertaken. There are no photos and no evidence of ongoing monitoring of the watercourses provided. It has not been determined where these ephemeral watercourses discharge to. These watercourses are in the vicinity of existing ponds, and it is not clear if these watercourses are hydraulically connected to the ponds. | Plates 12-8 and 12-9 in **ES Chapter 12: Water Resources [APP/6.2.3]** show the nature of the blind ditches onsite, and these were dry during the Site walkovers undertaken by a chartered hydrologist in 2024 and 2025. Further tracing investigations would not conclude otherwise. It should also be noted that observations from separate Site walkovers in 2024 and 2025 to inform **ES Chapter 7: Ecology and Biodiversity [REP3-038]** also noted ditches onsite to be dry, as outlined in paragraph 7.8.127. As such, there is no need for 'ongoing monitoring' of the blind ditches. |
| NCC7 | **ExQ2 Q8.0.4 Cont.**<br><br>NCC notes that the applicant has undertaken modelling on an ordinary watercourse near the A1065 and the Southacre Road that is within the order limits and is shown to connect to the River Nar. This confirms that ordinary | The Applicant has not 'undertaken modelling on an ordinary watercourse'.<br><br>There are no ordinary watercourses within the Order limits – this has been confirmed by Site observations and Ordnance Survey Mastermapping data, which details the course of drains and ordinary watercourses. |

| Reference | Comments | Applicant's Response |
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| | watercourses are within the site area, and therefore, the Land Drainage Act would apply to even in the event that sufficient evidence is able to confirm that other watercourses on site are not connected to the wider network. (…)<br><br>The applicant's proposed disapplication of the Land Drainage Act appears to be a premature and disproportionate approach when the applicant has not undertaken sufficient investigation and design development at this time to adequately define the works proposed and their location. It should be noted that if there is no need for works in a watercourse, then there would be no requirement for an application under the Land Drainage Act. NCC encourages applicants to discuss their potential in-channel works with our consenting officers to determine whether a consent is required. | **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]** was informed by a 2D direct rain on grid model which was utilised to verify the overland surface water pathway identified on the Environment Agency Flood Map for Planning, which drains from south to north along the western extent of Work Nos. 2 - 4.<br><br>There are no in-channel works proposed for ordinary watercourses outside the Order limits.<br><br>Therefore, the Applicant considers its proposed disapplication of the relevant provisions of the Land Drainage Act 1991 to be proportionate and in accordance with standard practice for solar DCOs. |
| NCC8 | **ExQ2 Q8.0.6**<br><br>NCC, as the LLFA, confirms that the applicant has modelled a watercourse (a stream) using a surface water model rather than in a fluvial model. At the time, the applicant had not included any information about the culvert under the road in the model and were assessing the watercourse in the same manner as overland flow. In relation to the policies, this model would provide the evidence base for the assessment of the consequences of flood risk and the impact that climate change could have directly and indirectly to the site and elsewhere once the proposed development is in place (Policy 4.10.8) such as on the adjacent public highway. The approach of using a surface water model for assessing fluvial flood risk is not a typical one used in industry (Policy 4.10.9). In relation to policy 4.10.10, the applicant has applied climate change to the pluvial model of the watercourse, however, the climate change allowances vary between surface water modelling and fluvial modelling as defined in The Climate Change Allowances for Flood Risk Assessments guidance. At present, with the limitations of the model, it is difficult for the applicant to demonstrate that "that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes" in accordance with policy 4.10.11. It is also not clear where along this watercourse, the surface water runoff from the proposed development BESS and Substations will discharge and at what rates as this information is not available at this time. Therefore, it is not possible for it to be included in the hydraulic model (relates back to policy 4.10.8 and 4.10.10). Consequently, it is difficult for the applicant to demonstrate accordance with relevant policies after 4.10.11 but also in relation to the Environmental Statement policy 4.3.4 and some of the subsequent policies as the evidence base is limited on this matter. | The Applicant refers NCC to the response to **NCC90** within **Applicant's Response to Relevant Representations [REP1-067]**.<br><br>**ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]** was informed by a 2D direct rain on grid model which was utilised to verify the overland surface water pathway identified on the Environment Agency Flood Map for Planning. The model extent covers the ephemeral linear drainage ditch to the north of Southacre Road. The linear nature of the ditch / watercourse is shown in Plate 12-7 of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]** and section 12.1.38 notes that there is a topographical rise of 5m from the southern bank of the unnamed watercourse to the proposed access point in Field 26 to the Scheme. As such, there is negligible risk to the Scheme from the ephemeral ditch which responds to heavy or prolonged rainfall, as concluded in Section 12.2.4 to 12.2.7 of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]**.<br><br>The 2D simulation incorporated a 40% climate change uplift for the 1% AEP event, which sees 18.018mm rain falling at the peak. A 57% uplift, in accordance with North West Norfolk Management Catchment peak river flow allowances, would see 20.21mm falling at the peak of the event. Given the negligible risk to electrically sensitive aspects of the Scheme during the 1% AEP + 40% climate change, the addition of 2.1mm of rainfall into the model will not perceptibly increase the flood extents or risk to the Scheme.<br><br>As shown on the EA's map, the surface water flood extents for the 1 in 1000 Year Event is confined to a narrow strip along Southacre Road and does not encroach substantially within the Order limits, and therefore will not directly interact with electrically sensitive infrastructure within Work Nos. 2 – 4.<br><br>Additionally, the exclusion of a culvert carrying the A1065 means that more water is retained closer to the Scheme, rather than being transferred downstream, meaning the results provide a conservative estimate of flood extents and depths for the ephemeral ditch.<br><br>Regarding the statement from the Council that "*it is also not clear where along this watercourse, the surface water runoff from the proposed development BESS and Substations will discharge and at what rates as this information is not available at this time*", the Applicant's proposed drainage strategy does not rely on discharge to the watercourse north of Southacre Road. As set out in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]**, the Scheme has been designed on the basis of infiltration drainage. Infiltration testing results presented in Appendix B of the FRA demonstrate that 8 of the 9 test locations exhibit 'Good' drainage characteristics, confirming that infiltration is a viable means of managing surface water runoff. These findings are further supported by the results of trial trenching undertaken across the Scheme, which identified similar sandy, free-draining soils. The infiltration testing and ground investigation data provide a consistent evidence base demonstrating favourable ground conditions for infiltration and supporting the feasibility of an infiltration-led drainage strategy, and is intended to manage runoff at source, rather than discharge flows to adjacent watercourses.<br><br>Detailed drainage design will be undertaken following the issue of the DCO (as consented) and is secured by Requirement 11 of the **draft DCO [APP/3.1.4]**. This design will refine the final drainage infrastructure, |

| Reference | Comments | Applicant's Response |
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| | | including any required attenuation volumes, infiltration features and associated discharge arrangements. Final discharge locations and rates are not yet fixed and will be determined through detailed design; however, the infiltration testing evidence demonstrated that infiltration drainage is feasible and provides confidence that surface water runoff can be managed within the Site without increasing flood risk elsewhere.<br><br>The Applicant considers the evidence presented within **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]** provides an appropriate and proportionate evidence base to demonstrate compliance within Policies 4.10.8 to 4.10.11 and The Climate Change Allowances for Flood Risk Assessments guidance. The FRA has identified and assessed the relevant sources of flood risk to and from the Scheme, including overland flow pathways associated with the ephemeral ditch north of Southacre Road, and has considered the potential effects of climate change.<br><br>The assessment concludes that the Scheme is not at an unacceptable risk of flooding and will not increase flood risk elsewhere, consistent with Policy 4.10.8 in particular. |
| NCC9 | **ExQ2 Q8.0.6 Cont.**<br><br>The applicant has undertaken a pluvial (surface water) model as the Environment Agency's surface water modelling is only suitable at a strategic level and not for a site specific flood risk assessment, due to the lack on site details such as topographic survey and / or watercourse channel survey cross sections, condition of the flowpath/watercourse channel, variability in hydrological approaches and better understanding of various other site parameters such as structures (like existing culverts) in the watercourse.<br><br>The applicant initially undertook this work as a preliminary comparison exercise. However, NCC notes the applicant has prepared a surface water model rather than a watercourse model for the ordinary watercourse near the A1065 and the Southacre Road that is within the order limits and is shown to connect to the River Nar. | **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]** was informed by a 2D direct rain on grid model which was utilised to verify the overland surface water pathway identified on the Environment Agency Flood Map for Planning.<br><br>As outlined in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]**, the ordinary watercourse to the north east of the A1065 is ephemeral and responds to heavy or prolonged rainfall rather than sustained fluvial flow and has been observed to be dry during Site walkovers (see Plate 12-7 of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]**). Whilst the ditch forms part of the wider catchment draining towards the River Nar, the flood mechanism relevant to the Scheme is local pluvial runoff within the ditch corridor rather than flooding associated with a larger fluvial system. As such, bespoke 2D direct rainfall modelling was undertaken to assess worst-case pluvial conditions in the absence of a detailed hydraulic model for this small ordinary watercourse, confirming that flooding remains confined to the ditch corridor and does not interact with Scheme infrastructure. The Scheme avoids any encroachment, culverting or modification of the watercourse and therefore does not affect conveyance or flood storage. On this basis, the conclusions drawn in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]** are evidence-led, precautionary and consistent with national and local guidance for the assessment of minor ordinary watercourses.<br><br>The 2D model uses well established principles and appropriate parameters, indicated by the extents closely matching those of the Environment Agency, demonstrating an acceptable approach to modelling pluvial flood risk as a proxy for 1D/2D modelling of an ephemeral ditch.<br><br>Culverts and other structures were excluded from the model as a conservative, worst-case assumption. By not representing culverts and any associated conveyance capacity, the modelling assumes less efficient drainage of runoff along the ditch corridor, resulting in more extensive ponding and flood extents than would be expected where these structures are operating as designed, ensuring the model does not underestimate potential flood risk. |
| NCC10 | **ExQ2 Q.10.0.3**<br><br>NCC would prefer to see the buried cables removed in order to minimise any risk of contamination to habitats, soils and groundwater, although it accepts that removal of any ducting has the potential to give rise to extensive ground and habitat disturbance. It would therefore agree that an environmental risk assessment should be carried out and that the Best Practicable Environmental Option (BPEO) should be implemented. | The Applicant welcomes this comment. |

# 3. The Applicant's responses to Prescribed Bodies

| Reference | Comments | Applicant's Response |
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| **National Highways (Responses to ExQ2) [REP3-096].<br>This response was also received from PINS on the 12 August. However, it is a duplicate of REP3-096** | | |
| NH1 | **EXQ2 Q5.0.4**<br>*(ii) (…)*<br>NH considers the Applicant does not need any temporary possession rights whatsoever over the NH plots set out in the Book of Reference. As set out above, all works in this location can be undertaken under via NH's normal processes for permitting works of this type on the highway. NH does not object in principle to the Applicant obtaining access to the SRN utilising this approach. | The Applicant has used an approach followed by other solar DCOs such as Green Hill Solar Farm (currently in the Decision phase), Lime Down Solar Park (currently in examination) and Light Valley Solar (currently in examination) all of whom are seeking temporary possession over National Highways' land. The Applicant has also reviewed consented DCOs which have taken this approach such as London Luton Airport Expansion and Yorkshire Green. The Applicant's general approach of seeking powers of compulsory acquisition and temporary possession in the **draft DCO [APP/3.1.4]** and, in parallel, conducting negotiations to acquire land and rights by agreement, accords with paragraph 26 of the Department for Communities and Local Government Planning Act 2008: Guidance related to procedures for compulsory acquisition of land (2013) (the CA Guidance). This approach is reflected in the Applicant's engagement with NH around protective provisions and a side agreement as set out in the **Land and Rights Negotiation Tracker [APP/4.4.3]**.<br>In any event, further to the form of protective provisions included for the benefit of NH in Part 4 of Schedule 15 of the **draft DCO [APP/3.1.4]**, the Applicant also notes that NH has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, and NH has confirmed its in-principle agreement to taking the same approach to the drafting of these protective provisions for this Scheme, which the Applicant understands will address NH's concerns in relation to this matter. The Applicant and NH remain in discussions on this matter, and the Applicant will update the **draft DCO [APP/3.1.4]** to reflect this mirrored approach once finalised with NH, which the Applicant anticipates being able to do before the end of the examination. |
| NH2 | **EXQ2 Q5.0.4 Cont.**<br>*(ii) (…)*<br>1. (…)it is clear that the proposal to acquire temporary possession over NH's land does not accord with the Government guidance on the basis that it not necessary or proportionate for these powers to be included in the DCO when clearly an alternative approach is available to the Applicant as set out above. A preference to rely on temporary possession rights, just in case these are needed because precise extent of works is not known until the detailed design stage, does not meet the necessary and proportionate test.<br>In light of the above, the inclusion of NH's plots in the Book of Reference is neither necessary or proportionate. | The Applicant's response to **NH1** above sets out why the approach of seeking powers of compulsory acquisition and temporary possession is in accordance with Government guidance. The Applicant's preference is to reach voluntary agreement with National Highways, rather than having to exercise its proposed powers of temporary possession, and the Applicant refers to its response to NH1 above on the matter of protective provisions in this regard. However, the temporary possession powers included by the Applicant in the **draft DCO [APP/3.1.4]** represent a necessary fall-back position to ensure that there is no impediment to the deliverability of the Scheme, as is standard practice. |
| NH3 | **Appendix 1 – EXQ1 Q5.0.9**<br>ii) The Applicant seeks temporary rights over eight plots of land on the slip roads at the A47 junction with the A1065 for which NH owns the title and/or has an interest. NH objects to the temporary acquisition of all these plots as it would fetter its duties in respect of road safety. As set out in response to Q5.0.9(i) if it is accepted that temporary rights are not required, all works in this location can be undertaken under via NH's normal processes for permitting works of this type on the highway. NH does not object in principle to the Applicant obtaining access to the SRN utilising this approach. | The Applicant notes this comment and refers to its responses to **NH1** and **NH2** above. |

| Reference | Comments | Applicant's Response |
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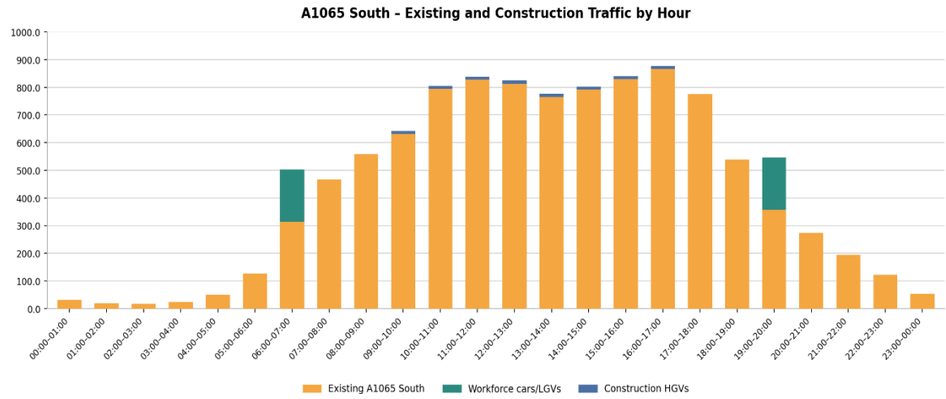
| NH4 | **Appendix 1 – EXQ1 Q13.0.3**<br>3. (…) NH's understanding is that the works on the SRN adjacent to The Splashes is to facilitate the movement of Abnormal Indivisible Loads and is minor in nature, for example, the temporary removal of street furniture. This would be expected to be of short duration and similar in practice to highway maintenance works, which are routinely carried out without detailed noise assessments being undertaken.<br>However, if the works proposed are not as understood and/or are more extensive and/or of a longer duration a detailed noise assessment may be required in accordance with DMRB. | The Applicant confirms that the works adjacent to The Splashes would be to facilitate the Abnormal Indivisible Load (AIL) deliveries only and are limited to temporary works, such as minor widening or reinforcement of kerbs or the removal of street furniture. These works are not required as permanent mitigation (they are only temporary), as secured through the section 7 of the **oCTMP [AS-082]**. |
| NH5 | **Appendix 2 – Paras. 2.1.1 to 2.1.3**<br>NH requires junction impact assessments where peak traffic increases by 30 trips. Forecast construction traffic (532 LGVs and 96 HGVs daily) is likely to exceed this, but without trip distribution information it is unclear if peak-period impacts on the SRN will occur.<br>NH therefore requests further clarification of impacts on the A47 junctions (A47/A1065 and A47/Narford Road) during peak hours to determine if modelling is needed. Given the high trip volumes, further junction performance analysis may be required, including consideration of impacts just outside peak periods potentially shifting peak times.<br>The cumulative impacts of construction traffic from this development in combination with that arising from the High Grove Solar Farm could have a significant adverse impact on the A47 and should be properly considered. | This matter was discussed with NH at a meeting on 14 July 2026, where additional information was provided to NH to confirm the requirement for junction modelling. As detailed within the **SoCG with National Highways [AS-074]**, it has been confirmed by NH that modelling would not be required, based on the expected impacts not being sufficient to warrant further assessment.<br>As detailed within **ES Appendix 9.2: Traffic Assessment [APP-163]**, construction staff will work in 12 hour shifts (07:00-19:00), with staff typically arriving before 07:00 and departing after 19:00 outside of peak hours.<br>All deliveries and trips will be restricted to avoid the AM peak (08:00-09:00) and PM peak (17:00-18:00) hours as secured through the **oCTMP [AS-082]**, thus there would be no material impact from the Scheme during peak hours. On a worst-case assumption that all 266 staff vehicles arrive in the AM and depart in the PM, the comparison of the impact is provided in the figure below. HGVs are restricted to be between 09:00-17:00 (equivalent circa 12 two-way vehicles per hour associated with the Scheme).<br>  <br>With the addition of the temporary construction traffic flows being added to the baseline flows along the A1065 between 06:00-07:00 and 19:00-20:00, the overall number of vehicles expected still falls below the level of traffic that would otherwise happen during the day from 08:00 to 18:00. On this basis, the impact associated with construction traffic from staff is unlikely to lead to any material change from what happens on the network or the existing queuing on the A47 slip roads.<br>With respect to cumulative traffic, it is considered that any overlap would be temporary in nature and still fall below what would otherwise be generated on the A1065 and thus the A47 slip roads. The assessment shows that even if the cumulative schemes generated the same amount of traffic as the Scheme (effectively doubling the additional traffic added to the baseline flows), it would still fall below what otherwise happens on the A1065 |

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| | | on a typical day and well within typical levels of daily traffic fluctuation, which are recognised within **ES Chapter 9: Transport and Access [REP1-036]** as being in the order of 10% on a typical day. |
| NH6 | **Appendix 2 – Paras. 2.2.1 to 2.2.4**<br>(…) NH requires a clear monitoring and enforcement regime, with further detail to be included in the OCEMP.<br>NH supports sustainable travel measures but considers the current Construction Travel Plan lacks sufficient detail, particularly on controls, enforcement, and NH's role in safeguarding the A47 junctions.<br>Mitigation measures such as signage require further detail on locations and will need NH approval and a Road Safety Audit.<br>The proposed Road Condition Survey should cover full construction routes, including the A47/A1065 and A47/Narborough Road junctions, due to increased HGV movements and potential for damage. | This matter was discussed with NH at a meeting on 14 July 2026, where confirmation was provided to NH to confirm the vehicle caps and monitoring protocol. The **oCTMP [AS-082]** was updated at Deadline 3 to confirm that the daily vehicle cap applies to both total vehicles and HGVs. With the additional restrictions on daily vehicular activity secured through the **oCTMP [AS-082]**. The **oCTMP [AS-082]** also included the additional details on the monitoring and enforcement protocol to assist with managing construction traffic, as requested by NH.<br>As detailed within the **SoCG with National Highways [AS-074]**, NH was satisfied that this was sufficient assurance that the appropriate measures would be implemented via the detailed Travel Plan to ensure the vehicle cap is not exceeded, as the vehicle cap restriction inherently requires the contractor to reduce daily vehicle traffic and promote sustainable transport, through measures such as the shuttle service or promoting car sharing. Further details on the implementation, monitoring and review of construction vehicle activity is included within section 8 of the **oCTMP [AS-082]** at NH's request.<br>In the event that physical mitigation measures are required on the NH network, including signage, the details of this would be subject to a Road Safety Audit which would be included within the detailed CTMP that is secured by way of requirement in the **draft DCO [APP/3.1.4]** and is initially secured through section 7 of the **oCTMP [AS-082]**. However, as these details are not yet available and construction is not at an appropriately advanced enough stage to agree signage, this would be addressed as part of the detailed CTMP once details are known and confirmed by the contractor.<br>The scope of the condition survey section within the **oCTMP [AS-082]** has been updated to include both the A47 / A1065 and the A47 / Narborough Road junctions. |
| NH7 | **Appendix 2 – Paras. 2.2.6 to 2.2.8**<br>NH supports measures to reduce trips, such as car sharing, but notes the assumed occupancy (1.5) exceeds the typical 1.4 used in similar schemes, which could increase vehicle numbers if unmet. Further detail is required on how sustainable measures will be implemented, monitored, and enforced.<br>NH also seeks a more detailed outline Construction Workforce Travel Plan to ensure these measures are actively enforced and effective.<br>Finally, NH requests that DCO wording be amended to reflect consultation with all relevant highway authorities, including NH, not just the local authority. | The Applicant refers to response **NH6** in relation to the vehicle cap, secured via the **oCTMP [AS-082],** to provide the required sustainable transport measures, which was agreed via the **SoCG with National Highways [AS-074]**.<br>In relation to NH's request to be a named consultee in relation to the detailed CTMP, it is noted that Requirement 15(2) of Schedule 2 of the **draft DCO [APP/3.1.4]** states that "*before approving the construction traffic management plan the relevant planning authority must consult with the relevant highway authority*". This wording is standard practice across many consented solar DCOs. As part of this approval, the relevant planning authority must consult with the relevant highway authority. However, the relevant planning authority is also entitled to consult with any other organisation if they deem it necessary to do so (though consultation with the relevant highway authority is already prescribed). It is therefore unnecessary to amend the **draft DCO [APP/3.1.4]** in the manner suggested by NH. |
| NH8 | **Appendix 2 – Paras. 2.3.1 to 2.3.2**<br>Requirement 20 of the DCO (point 4) states the Decommissioning Strategy will be agreed with local planning authorities. NH requests this is amended to include NH as the SRN highway authority.<br>A Decommissioning Traffic Management Plan (DTMP) is also expected to be prepared by the contractor prior to decommissioning. | The Applicant understands that an approach to consultation with NH under the various Requirements in Schedule 2 of the Green Hill Solar Farm DCO is nearly agreed with NH. Should that agreement be reached, the Applicant will discuss with NH whether the same approach is agreed for this Scheme and, if so, would update the **draft DCO [APP/3.1.4]** to replicate the relevant wording of those Requirements. These discussions remain ongoing between the parties.<br>In relation to the proposed DTMP, the **oDS [REP3-067]** states, at paragraph 2.3.2, that "*the traffic management mitigation measures set out in the **outline Construction Traffic Management Plan [REP3-075]** are also applicable to decommissioning and will be secured via a requirement in the DCO*". Further, at paragraph 2.6.2, it states that "*a Decommissioning Traffic Management Plan (DTMP) will be developed by a contractor prior to decommissioning in consultation with the appropriate Local Planning Authority. The DTMP will use the detailed CTMP to reflect the circumstances prevailing during the period in which decommissioning is to be carried out*" and at paragraph 2.6.3 that "*the measures defined in the DTMP will ensure that the* |

| Reference | Comments | Applicant's Response |
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| | | *impacts from decommissioning traffic on the local community (including local residents and businesses and users of the surrounding transport network) are minimised, where reasonably practicable*". See further references in Tables 4 and 15 of the **oDS [REP3-067]** which confirms that the contractor must prepare a DTMP prior to decommissioning. |
| NH9 | **Appendix 2 – Para. 2.2.3**<br>[Comments made in relation to land interests]<br>(…) The Applicant is asked to confirm whether NH has any interest in any other plots beyond those listed. | The Applicant can confirm NH does not have any interest in any other plots beyond those listed but welcomes the ongoing engagement on the matter. |
| NH10 | **Appendix 2 – Para. 3.1**<br>NH objects to numerous articles (…) on the basis that they grant the Applicant powers over the SRN or NH's land without requiring NH's consent.<br>Key concerns include:<br>- Street works and highway powers (…)<br>- Land and access powers (…)<br>- Trees (…)<br>- Deemed consent (…)<br>- Schedule 2 Requirements (…); and<br>- Schedule 16 (…).<br>NH's consistent position is that inclusion of paragraph 7(2) of its proposed protective provisions (...) would resolve these objections by requiring the Applicant to obtain NH's prior consent before exercising any DCO powers affecting the SRN or NH's land interests. | Further to the form of protective provisions included for the benefit of NH in Part 4 of Schedule 15 of the **draft DCO [APP/3.1.4]**, the Applicant also notes that NH has recently agreed to the form of protective provisions for its benefit found in Part 6 of Schedule 15 of the Green Hill Solar Farm DCO, and NH has confirmed its in-principle agreement to taking the same approach to the drafting of these protective provisions for this Scheme. The Applicant and NH remain in discussions on this matter, and the Applicant will update the **draft DCO [APP/3.1.4]** to reflect this mirrored approach once finalised with NH, which the Applicant anticipates being able to do before the end of the examination.<br>Crucially, and in any event, the Applicant notes that these protective provisions include an agreed form of the wording in paragraph 7(2) of NH's proposed protective provisions, which NH state will address their objection to these articles. |
| NH11 | **Appendix 2 – Para. 4.1**<br>The proposed protective provisions in Schedule 15, Part 4 are unacceptable to NH and do not provide sufficient protection to the SRN. | The Applicant refers to its response to **NH10** above on this matter (with the ongoing negotiations regarding an agreed form of protective provisions also covering the impact on the SRN). |
| **Environment Agency (Responses to ExQ2) [REP3-095]** | | |
| EA1-1 | **ExQ2 Q8.0.1**<br>(i) (…) We hold residual concerns that groundwater conditions could locally be shallower than indicated by modelling. However, the Applicant has committed to pre construction groundwater monitoring within the CSA and the refinement of foundation design based on these data should this be the case. | The Applicant can confirm that the **oCEMP [APP/7.6.4]** includes the provision of groundwater monitoring within the Order limits to ensure there is limited potential for direct interaction of belowground aspects of the Scheme with the underlying aquifer. |
| **Environment Agency (Comments on the Deadline 2 submissions and any other information requested by the ExA for Deadline 5) [REP3-101]** | | |
| EA2-1 | **EA01 (Source Protection Zone)**<br>We were concerned that 6.3 Environmental Statement Figure 12.5 [APP-119] is unclear in regard to how the draft Order Limits, Battery Energy Storage System (BESS) sites, substation sites and SPZs intersect. | Figures associated with **ES Chapter 12: Water Resources [APP/6.2.3]** were updated at Deadline 3 to reflect the EA's comments. This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Response Letter **[AS-087]**.<br>**ES Figure 12.5: Source Protection Zones [APP/6.3.2]** has been updated at Deadline 4. |

| Reference | Comments | Applicant's Response |
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| | We are unable to find any amended figures in the updated documents. | |
| EA2-2 | **EA02 (Drinking Water Protected Area)**<br>We were concerned that Figure 12.12 [APP-126] does not show all of the drinking water protection designations, including the Drinking Water Surface Water Safeguard Zone and Drinking Water Groundwater Safeguard Zone. The reader is therefore unable to see these designations in the context of the draft Order Limits.<br>We are unable to find any amended figures in the updated documents. | Figures associated with **ES Chapter 12: Water Resources [APP/6.2.3]** were updated at Deadline 3 to reflect the EA's comments. This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Response Letter **[AS-087]**. |
| EA2-3 | **EA03 (3D Representation of Groundwater)**<br>We were concerned that 6.3 Environmental Statement Figure 12.7 3D Representation of Groundwater [APP-121] is difficult to interpret, which limits it's value. We requested additional views of the modelled area, with a clearer indication of view orientation and contouring of the groundwater surface, if applicable.<br>We are unable to find any amended figures in the updated documents. | Figures associated with **ES Chapter 12: Water Resources [APP/6.2.3]** were updated at Deadline 3 to reflect the EA's comments. This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Response Letter **[AS-087]**. |
| EA2-4 | **EA04 (Groundwater Flow Direction)**<br>We were concerned that the groundwater flow direction shown in figures 12.7 to 12.16 may be inaccurate. We advised that the claims made in sections 12.6.37 and 12.6.38 of 6.2 Environmental Statement Chapter 12: Water Resources [APP-061] should be revised, supported by new evidence.<br>We are unable to find any amended figures in the updated documents. | Figures associated with **ES Chapter 12: Water Resources [APP/6.2.3]** were updated at Deadline 3 to reflect the EA's comments. This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Follow-up Response Letter **[AS-088]**. |
| EA2-5 | **EA05 (Maximum Foundation Extents)**<br>We were concerned that figures 12.13 [APP-127], 12.14 [APP-128], 12.15 [APP-129] and 12.16 [APP-130] do not clearly define the area represented by the drawings, including view orientation, or the elevation values.<br>We are unable to find any amended figures in the updated documents.<br>We note that figure A12-1-10 provided in the 6.4.2 Appendix 12.2 Flood Risk Assessment (Tracked) [REP2-019], appears to show no interaction between any of the Work Nos to a depth of 15m. This contradicts the statement in 6.2.1 Chapter 12 Water Resources (Tracked) [REP2-011] Section 12.8.20, which states that a potential interaction of up to 1m has been determined for a small section of Work No. 4. | Figures associated with **ES Chapter 12: Water Resources [APP/6.2.3]** were updated at Deadline 3 to reflect the EA's comments.<br>It should be noted that there is a very minor area of interaction between Work No. 4 and the maximal groundwater elevation, which may not be perceptible at the scale produced within Plate 12-22 of **ES Appendix 12.2 Flood Risk Assessment [APP/6.4.4]**. As such, there is no contradiction between the two documents referenced.<br>This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Response Letter **[AS-087]**. |
| EA2-6 | **EA06 (Avoidance of Pipelines)**<br>We were concerned that figure 16.1 of [APP-131] didn't show the approximate routes of the former Ministry of Defence (MoD) oil pipeline or Exolum pipeline, which traverse the draft Order Limits.<br>Section 12.6.19 confirms that the Exolum pipeline does not run through the Scheme, however no further information is provided regarding the abandoned | The Applicant updated **ES Figure 16.1: Utilities Plan [REP3-051]** at Deadline 3 to include the approximate location of the abandoned MoD fuel pipeline.<br>This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Response Letter **[AS-087]**. |

| Reference | Comments | Applicant's Response |
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| | MoD fuel pipeline. We require the figure 16.1 to be updated with the approximate route of the MoD pipeline. | |
| EA2-7 | **EA21 (Trenchless Installation Methods)**<br>We were concerned that the definition provided in table 6 [APP-186] was vague in regard to the trenchless crossing techniques, and therefore, mitigation measures to avoid impacts to groundwater may not be sufficient.<br>We require the 7.6.2 Outline Construction Environmental Management Plan (Tracked).pdf [REP2-023] to be updated to state that Horizontal Directional Drilling (HDD) works would be supported by a Hydrogeological Impact Assessment and Drilling Fluid Breakout Plan.<br>Please note this issue is linked with EA27. | The **oCEMP [APP/7.6.4]** was updated at Deadline 3 to include a commitment to undertaking a Hydrogeological Impact Assessment and Drilling Fluid Breakout Plan.<br>This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Response Letter **[AS-087]**. |
| EA2-8 | **EA24 (Foundation Work Risk Assessment)**<br>(…)<br>We strongly recommend that Chapter 12 [REP2-011] and 6.4.1 ES Appendix 12.3 Water Framework Directive Assessment (Tracked) [REP2-013] are updated to make it unambiguously clear that a FWRA will be carried out for all piling and foundation works. This would be consistent with the statements in the 7.6.2 Outline Construction Environmental Management Plan (Tracked).pdf [REP2-023] and Flood Risk Assessment [REP2-019]. We expect a FWRA to be carried out for PV piling works, should post-consent ground investigation and monitoring demonstrate that these may interact with groundwater. | **ES Chapter 12: Water Resources [APP/6.2.3]** was updated at Deadline 3 to remove the word 'likely' and confirm that a foundation works risk assessment (FWRA) will be undertaken prior to the construction phase once the detailed design of the Scheme has progressed.<br>This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Response Letter **[AS-087]**. |
| EA2-9 | **EA27 (Hydrogeological Impact Assessment)**<br>We were concerned that the definition provided in table 6 [APP-186] was vague in regard to the trenchless crossing techniques, and mitigation measures to avoid impacts to groundwater may not be sufficient.<br>We require the 7.6.2 Outline Construction Environmental Management Plan (Tracked).pdf [REP2-023] to be updated to state that Horizontal Directional Drilling (HDD) works would be supported by a Hydrogeological Impact Assessment and Drilling Fluid Breakout Plan.<br>Please note this issue is linked with EA21. | The Applicant refers to its response to **EA2-7** above.<br>This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Response Letter **[AS-087]**. |
| EA2-10 | **EA34 (Penstock Valve)**<br>(…)<br>There is no reference within the current 7.14 outline Battery Safety Management Plan [APP-194] to the inclusion of an automated penstocks with a manual override. We require the outline Battery Safety Management Plan (BSMP) to be updated to include this commitment. | The **outline Battery Safety Management Plan (oBSMP) [APP/7.14.2]** was updated at Deadline 3 to include reference to a manual override.<br>This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Response Letter **[AS-087]**. |
| EA2-11 | **EA36 (Underground contaminated water tanks)**<br>An outstanding item from the 8.4 Applicant's Response to Relevant Representations [REP1-067] for this issue is the following: ES Appendix 12.2: | **ES Appendix 12.2 Flood Risk Assessment [APP/6.4.4]** has been updated at Deadline 4 to reflect the wording regarding aboveground storage for spent firefighting water requested by the Environment Agency. |

| Reference | Comments | Applicant's Response |
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| | Flood Risk Assessment [AS-053] will be updated at a future Deadline to confirm that, should there be space following the detailed design of the Scheme, then aboveground, impermeably lined detention basins will be favoured over belowground structures. We have not been able to locate this statement in the updated 6.4.2 Appendix 12.2 Flood Risk Assessment (Tracked) [REP2-019]. | |
| EA2-12 | **EA42 (Missing Legislation)**<br>To ensure that contractors act in accordance with the guidance, we request that the "EA – Approach to Groundwater Protection" and "National standard for sustainable drainage systems (SuDs)" are included within the 7.6.2 Outline Construction Environmental Management Plan (Tracked).pdf [REP2-023]. | The **oCEMP [APP/7.6.4]** was updated at Deadline 3 to include reference to the "EA – Approach to Groundwater Protection" and "National standard for sustainable drainage systems (SuDs)".<br>This matter is now agreed with the EA, per the EA's Deadline 3 Submissions Response Letter **[AS-087]**. |
| EA2-13 | **EA46 (Environment Agency Protective Provisions)**<br>We note that protective provisions are still included for the Environment Agency within Schedule 15 part 5 of the 3.1.2 draft Development Consent Order (Tracked) [REP2-005]. We request the removal of this wording to resolve this issue.<br>(…)<br>We note that the Applicant is seeking disapplication for workings within work no.11, which falls within the floodplain of an ordinary watercourse. As previously stated, we do not believe these works would require an environmental permit.<br>(…)<br>The Applicant should provide sufficient information with their request to disapply for the Environment Agency to be able to make the above decisions about the activity.<br>When the Environment Agency have agreed to disapply their legislation they have developed a set of standard Protective Provisions, that are available upon request. It is important for the Applicant to note that the Environment Agency holds the ultimate decision and the right to refuse any request to disapply. | As stated in the **Applicant's Response to Written Representations and other Deadline 2 Submissions [REP3-087]**, 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 Flood Risk Activity Permit (FRAP).<br>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.<br>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 [APP/3.1.4]** at Deadline 1 to mirror the Environment Agency's preferred wording. Given that the Applicant seeks the disapplication, as explained above, the Applicant will retain these protective provisions in the **draft DCO [APP/3.1.4]**.<br>The Applicant notes and understands the Environment Agency's position, but considers that the parties have reached a position whereby they 'agree to disagree'. |
| EA2-14 | **EA46 (Environment Agency Protective Provisions) Cont.**<br>The Applicant stated that work in work no.11, may require a Flood Risk Activity Permit (FRAP). As highlighted above, we do not believe these works would require an environmental permit. The area in question is the floodplain of an ordinary watercourse, rather than a main river, so a FRAP will not be required. | The Applicant refers to its response to **EA2-13** above in relation to this matter. The Applicant also notes that there are no ordinary watercourses within the Order limits – this has been confirmed by Site observations and Ordnance Survey Mastermapping data, which details the course of drains and ordinary watercourses. |
| EA2-15 | **EA48 (Permitted Preliminary Works)**<br>(…) The CEMP secured via Requirement 13, only requires submission of a detailed CEMP prior to commencement. This means that remediation of the site could take place without the CEMP being approved or in place, and therefore without the controls and mitigation commitments offered by the CEMP.<br>(…) | The Applicant has responded to this matter in the **Applicant's Response to Written Representations and other Deadline 2 Submissions [REP3-087]** (reference EA22). In summary, though, the Applicant notes the Environment Agency's concerns regarding remediation prior to the detailed CEMP being approved and will therefore (as also set out in the **Applicant's Response to Local Impact Reports [REP2-027]**) submit a permitted preliminary works environmental management plan at Deadline 4. This will set out the methodology to be used for any permitted preliminary works, and the Applicant will welcome comments from Interested Parties, including the Environment Agency, on this plan. |

| Reference | Comments | Applicant's Response |
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| | We request that the Environment Agency is consulted on this permitted preliminary works environmental management plan. If an outline version of it is made available, then we also request to be consulted on this document. | In respect of the Environment Agency's request to be consulted on this plan, 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 **draft DCO [APP/3.1.4]**. This is because this document will be submitted at Deadline 4 for comments from Interested Parties, including the Environment Agency, with the final version to be submitted during the course of the examination. Therefore, no further approval process post-examination will be required. |
| EA2-16 | **EA48 (Permitted Preliminary Works) Cont.**<br>[The issue and impact of the drafted text within the draft DCO in relation to Permitted Preliminary Works is outlined]<br>We request that either '(d) remedial work in respect of any contamination or other adverse ground conditions' is removed from the "permitted preliminary works" definition, or Requirement 13 is amended to include the following clause, "for the purposes of 13(1) "commence" must include 'remedial work in respect of any contamination or adverse ground conditions'.<br>*Additional Comments*<br>If the Applicant can point to an alternative satisfactory control to the CEMP then we will consider that. | The Applicant notes the Environment Agency's submissions in relation to this matter and also notes that they state that "*the permitted preliminary works environmental management plan would have relevance to this issue*". The Applicant therefore refers to its response to **EA2-15** above and looks forward to receiving the Environment Agency's comments on this document, which has been submitted at Deadline 4, including in respect of this remedial work. |
| EA2-17 | **Draft Development Consent Order**<br>As a named consultee on the discharge of several Requirements, we request that the provision of at least 15 working days (21 calendar days) to respond to the discharge authority is reflected in the draft Development Consent Order (APP-018). | The Applicant has responded to this specific matter in the **Applicant's Response to Written Representations and other Deadline 2 Submissions [REP3-087]** (reference EA23). Rather than repeating its submissions in this regard, the Applicant refers to Environment Agency to that previous submission. |

# 4. The Applicant's Responses to Members of the Public

| Reference | Comments | Applicant's Response |
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| **Dr. Mark Holmes (Comments on the Deadline 2 submissions and any other information requested by the ExA for Deadline 3) [REP3-099]** | | |
| MH1 | **Question 1**<br>Can the applicant confirm that previous & ongoing survey work covers all of the Droves site ? | The extent of the bird surveys across the Site is documented in **ES Appendix 7.2: Baseline Ecological Survey Report [APP-148].** Owing to its size, in order to provide adequate coverage, the Site survey was split into five similarly sized sectors: North, East, South, West, and North-West as shown on Plan 6806/ECO7a-f contained within **ES Appendix 7.2: Baseline Ecological Survey Report [APP-148].**<br>Parts of the 'Area for skylark mitigation' as shown on the **ES Figure 5.1: Concept Masterplan [AS-022]** and Field 39 as shown on the **ES Figure 3.3: Field Numbering Plan [APP-071]** were not surveyed as the 'area for Skylark mitigation' will be subject to measures to benefit Skylark (and therefore will not be subject to any adverse effects in regard to breeding birds, including Stone-curlew, such that further/additional surveys were not considered necessary in regard to this group). Similarly in regard to Field 39, this field is included within the Order limits in order to facilitate works in connection with a connection to the existing overhead transmission electric lines. The vast majority of this field will therefore remain unaffected in the long term. New infrastructure will be limited to Works 5A, which would include new pylons and gantries in proximity to the existing Pylons, which would remain over 100m from the majority of land within Field 39 and would therefore be unlikely to result in significant additional effects on ground nesting birds including Stone-curlew. |
| MH2 | **Question 2**<br>Can the applicant provide Stone Curlew breeding/territory records for the whole Droves site, drawing on the Norfolk Biodiversity Information Service, RSPB & Breckland Stone Curlew recording scheme data, for at least the last 5 years. Also can the applicant confirm whether any records exist for fields not covered by the applicant's survey work to date ? | The Applicant can confirm that records have been requested and received from the RSPB and the Norfolk Biodiversity Information Service (NBIS) in respect of Stone-curlew *Burhinus oedicnemus*. There are no background records of Stone-curlew held by RSPB or NBIS, from within the Site or the 500m buffer (including fields not covered by the Applicant's own survey work). |
| MH3 | **Question 3**<br>Could the applicant confirm what buffer distance from active, potentially active or historic stone curlew nesting sites has been applied across the whole site & how this is secured within the detailed Landscape & Ecological plan ? | As discussed in the Applicant's response to **MH2** above, there are no background records of Stone-curlew within the Site or the 500m buffer held by RSPB or NBIS. |
| MH4 | **Question 4**<br>I am again asking for clarification of what further licensed survey work is planned annually over a minimum of 5 years from the latest apparent breeding records for Stone Curlews in 2025 ? It is especially important that there is liaison with Natural England (who provide licences) & the RSPB who monitor the endangered Breckland Stone Curlew population. Can the applicant confirm that a survey licence was previously obtained from NE in view of the know presence of Schedule 1 protected Stone Curlews on this site ? | The Applicant notes that confirmation has been received from Natural England, as set out in the **SoCG with Natural England [AS-072]** that the information provided is sufficient to conclude that the Scheme would not result in any likely significant adverse effects on the interest features of Breckland SPA (including Stone-curlew). As discussed in the Applicant's response to **MH2** and **MH3** above, there are no background records of Stone-curlew within the Site or the 500m buffer held by RSPB or NBIS. Nonetheless, it is noted (in line with comments from Natural England) that Stone-curlew is a protected species in its own right under Section 1 of the Wildlife and Countryside Act 1981 (in line with all wild bird species), such that any intentional or reckless killing, injury, taking, damage or destruction of nests, obstruction or prevention of access to nests or damage or destruction of eggs would represent an offence. In addition, Stone-curlew is listed on Schedule 1 of that Act (in line with a number of bird species), such that it is also protected from disturbance whilst building a nest, in or near a nest containing eggs or young, or disturbance of dependent young. In line with other bird species, mitigation measures (including timing of works) are set out in the **oCEMP [APP/7.6.4]**, which would prevent any potential offence in regard to Stone-curlew or any other bird species.<br>As such, no licensing is necessary in relation to Stone-curlew as no offence will be committed. |

| Reference | Comments | Applicant's Response |
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| MH5 | **Question 5**<br>Can the applicant confirm what post-construction monitoring & reporting for Stone Curlews is proposed across the whole site, for how many breeding seasons, and to whom the results would be reported ? | As set out within the **oLEMP [REP3-069]**, post construction monitoring of bird populations across the Order limits, both within the Solar PV Array areas and potential mitigation areas, will be undertaken and compared to baseline bird survey data collected for the Scheme. This will be fully set out within the detailed LEMP, including details on to whom this data would be reported. |
| MH6 | **Page 2**<br>can the applicant confirm that they have continued to consult with NATURAL ENGLAND & the RSPB on what further licensed survey work etc. is needed going forward ? In fact the applicant needs to ask NE & the RSPB whether any current mitigation is relevant for Stone Curlews - my understanding is that it would NOT be, as Stone Curlews move breeding sites with the crop rotation. | Please see the Applicant's response to **MH4** above. |
| MH7 | **Page 3**<br>Can the applicant confirm that NITROGEN DEPOSITION IMPACTS have been completely addressed ? These impacts form one of the qualifying features of adjacent Breckland SPA which the Droves site is functionally linked to. The Breckland SPA could be severely & adversely affected by transportation of materials to & from the Droves site. | The Applicant can confirm that nitrogen deposition impacts in respect of Breckland Special Protection Area (SPA) have been fully considered, as set out within the **Shadow Habitats Regulations Assessment [AS-057]**. As previously confirmed, Natural England have stated within its **Relevant Representation [RR-038]** and in the corresponding **SoCG with Natural England [AS-072]** that *"we concur with the conclusion of the Shadow Habitats Regulations Assessment (SHRA)(APP/7.3) that likely significant effects on European sites can be ruled out, either alone or in combination with other plans or projects and that there is therefore no need to progress to Stage 2 Appropriate Assessment".*<br>Natural England has also confirmed that the Site does not constitute functionally linked land in relation to Breckland SPA. |
| **Antony Morgan (Responses to ExQ2) [REP3-098]** | | |
| AM1 | **Q11.0.1, Q11.0.2, Q11.0.4, Q11.0.5 Landscape and visual effects**<br>I ask the applicant to provide clear and consistent evidence on: (i) the dimensions and permanence of the field margin relied upon for residential visual amenity assessment at Keeper's Cottage; (ii) the apparent discrepancy in pylon heights shown at Viewpoint 12 between the photowire and photomontage figures; (iii) how protection of Bartholomew's Hill Plantation, including long-term maintenance of screening planting, will be secured in the dDCO; and (iv) why the cumulative landscape and visual effects assessment excludes development beyond a 3km search area, which in my view does not adequately capture the cumulative change to this part of the landscape. | The Applicant provides the following responses to the various points raised:<br>(i) The Solar PV Site areas are set on the **Works Plan [REP3-004]** as a development parameter. This means that the areas containing the proposed Solar PV arrays are fixed through the DCO and, as such, the offset distance and field margin from Keeper's Cottage would be as assessed within the RVAA.<br>(ii) 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. Parameter wirelines are included within **ES Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires (Part A,B,C,D) [AS-023] AS-025] [AS-027] [AS-029]** and **ES Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires (Part A,B,C,D) [AS-031] [AS-033] [AS-035] [AS-037].** Illustrative Photomontages are included within **ES Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme (Part A,B,C) [REP3-058] [REP3-059] [REP3-060]** and **ES Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme (Part A,B,C) [AS-045] [AS-047] [AS-049].** Additional visualisations requested by Breckland Council are included within **Technical Information Note - Landscape and Visual [REP3-083]. ES Chapter 6: Landscape and Visual [AS-016]** 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 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, with a maximum height of 55m Above Ground Level (AGL), as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.4]**.<br>(iii) Bartholomew's Hill Plantation is not located within the Order limits for the Scheme. The Applicant is not applying to undertake any works or maintenance operations within Bartholomew's Hill Plantation. |

| Reference | Comments | Applicant's Response |
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| | | The Applicant has provided a cumulative landscape and visual assessment within Section 6.11 of **ES Chapter 6: Landscape and Visual [AS-016]**. The cumulative assessment has been undertaken in accordance with the Planning Inspectorate's Guidance on cumulative assessment. **ES Appendix 2.4: Cumulative Schemes [REP3-063]** identifies all the potential cumulative schemes as a Long List within a 25km search area, which was then further refined to a Short List to focus on those schemes which are likely to give rise to significant cumulative landscape and visual effects. |
| AM2 | **Q5.0.1 Decommissioning funding**<br>I ask that the applicant be required to provide a revised funding statement demonstrating decommissioning is adequately funded before the examination closes. | As set out in the **Applicant's Response to ExQ2 [REP3-088]**, a requirement to decommission the Scheme is set out in Requirement 20 of the **draft DCO [APP/3.1.4]**; failing to comply with that requirement would be a criminal offence.<br>Decommissioning is also covered in the agreements with landowners, which include decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security will be regularly re-valued throughout the lifecycle of the Scheme and topped up if necessary.<br>Therefore, all parties should have sufficient confidence that the decommissioning can be suitably funded by the Applicant. |
| AM3 | **Flooding at the BESS and substation compound**<br>(1) Could the applicant confirm the Flood Zone classification and the specific pluvial and fluvial flood risk (in mm/hr and return period terms) applicable to the footprint of the BESS and both substations, as distinct from the site-wide assessment? | Work Nos. 2 to 4 (BESS and substations) are located within Flood Zone 1 i.e. land having a less than 0.1% (1 in 1000) annual probability of flooding form fluvial sources, as shown in Figure A12-1-1 of **ES Appendix 12.2 Flood Risk Assessment [APP/6.4.4]**.<br>Regarding pluvial risk, the EA Flood Map for Planning (2026) shows that Work Nos. 2 – 4 are not at risk of flooding during the 1% annual exceedance probability event (AEP) i.e. 1 in 100 year event. The 'upper end' climate change allowance for the 2070s epoch (2061 to 2125) for the 1% AEP shows a minor section of Work No. 2 is located within a pluvial flow pathway which is modelled to flood to a depth of less than 150 mm. There is a commitment within the **Design Principles, Parameters and Commitments [APP/5.8.4]** at Deadline 3 to locate aboveground aspects of Work Nos. 2 to 4 outside of the pluvial flooding extent. |
| AM4 | **Flooding at the BESS and substation compound Cont.**<br>(2) Given the vulnerability classification of the BESS and substations under NPS EN-1 (essential infrastructure), could the applicant confirm what flood mitigation measures (e.g. raised plinth levels, bunding, sealed cable ducts, sub-surface drainage) are proposed specifically at these structures, and how these would be secured as requirements in the dDCO? | The **Design Principles, Parameters and Commitments [APP/5.8.4]** were updated at Deadline 3 to commit the aboveground aspects of Work Nos. 2 to 4 to be located outside the extent of pluvial flooding. As such, this is secured in the **draft DCO [APP/3.1.4]**. |
| AM5 | **Flooding at the BESS and substation compound Cont.**<br>(3) Could the applicant confirm whether the SuDS capacity calculations referenced in response to Q8.0.2(ii) have been modelled separately for the BESS/substation compound, accounting for its own impermeable area and fire suppressant water volumes, rather than only as part of an aggregate site-wide calculation? | As outlined in **Design Principles, Parameters and Commitments [APP/5.8.4]** all impermeable areas of the BESS and substation compounds will be served by a SuDS network designed to the 1% AEP event plus 40% climate change allowance plus an appropriate volume for firefighting water, based on guidance at the time of the detailed design of the Scheme. |
| AM6 | **Flooding at the BESS and substation compound Cont.**<br>(4) Could the applicant confirm whether the Environment Agency's updated Flood Map for Planning (May 2026, referenced at Q8.0.5) has been used to re-assess flood risk specifically at the BESS and substation footprint, and if not, when this will be done? | The EA Flood Map for Planning (2026) shows no increase in the extent of fluvial flood zones associated with the River Nar and Work Nos. 2 to 4 remain in Flood Zone 1. As such, **ES Appendix 12.2: Flood Risk Assessment [APP/6.4.4]** does not require updating on this basis. |

| Reference | Comments | Applicant's Response |
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| AM7 | **Flooding at the BESS and substation compound Cont.**<br>(5) In the event of a flood event coinciding with a BESS fire incident, could the applicant set out what contingency drainage or containment measures are proposed to prevent contaminated fire-suppressant water combining with flood water and reaching watercourses? | As outlined in **Design Principles, Parameters and Commitments [APP/5.8.4]**, the BESS will be served by a SuDS network designed to the 1% AEP event plus 40% climate change allowance plus an appropriate volume for firefighting water, based on guidance at the time of the detailed design of the Scheme.<br>Contaminated firewater will be prevented from entering the wider drainage network and nearby watercourses through the provision of a dedicated contaminated water tank, designed to contain spent fire-suppression water, allowing for removal and disposal via tankering off site by a suitably licensed contractor. |
| AM8 | **Ministry of Defence / RAF Marham objection**<br>(1) Could the applicant confirm the current, up-to-date position of the Ministry of Defence/DIO, specifically whether its objection to the proposed development has been formally withdrawn and, if not, what outstanding matters remain unresolved? | The Applicant can confirm that engagement is ongoing with the MOD and their objection has not yet been formally withdrawn, but the Applicant is confident of reaching an agreed position with the MOD which would result in the withdrawal of their objection.<br>Currently, discussions are ongoing regarding the mechanisms by which commitments will be secured, though the parties are in agreement regarding the principle of the matters to be addressed. |
| AM9 | **Ministry of Defence / RAF Marham objection Cont.**<br>(2) Could the applicant provide the technical evidence and assessments (including any glint and glare study and any radar impact assessment) submitted to the MoD in support of its case, and confirm whether the MoD's own technical experts have reviewed and formally accepted these assessments? | **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP-176]** was submitted as part of the DCO Application. The Applicant remains in helpful discussions with the MOD regarding an appropriate solution to the concerns raised by the MOD, both in relation to mitigation of the potential impact of the Scheme on the PAR and in relation to glint and glare effects. This includes discussions in relation to technical evidence and assessments, which remain subject to the privacy of these discussions at this time.<br>The Applicant is confident of reaching an agreed position with the MOD and will inform the examination (including all Interested Parties), once these matters are resolved (including in relation to agreed mechanisms and next steps). |
| AM10 | **Ministry of Defence / RAF Marham objection Cont.**<br>(3) Could the applicant confirm the specific content and current status of the 'management plan' that the MoD has indicated is required, and confirm whether this would be secured as a requirement in the dDCO, rather than as an informal or non-binding commitment? | The Applicant remains in helpful discussions with the MOD regarding an appropriate solution to the concerns raised by the MOD, both in relation to mitigation of the potential impact of the Scheme on the PAR and in relation to glint and glare effects.<br>The Applicant is confident of reaching an agreed position with the MOD and will inform the examination (including all Interested Parties), including updating the **draft DCO [APP/3.1.4]** as necessary, once these matters are resolved. |
| AM11 | **Ministry of Defence / RAF Marham objection Cont.**<br>(4) Given that the MoD is the recognised technical authority on operational safety for RAF Marham and the F-35 Lightning force based there, could the applicant explain what its position would be, and what the implications for the development would be, if the MoD's objection remains unresolved by the close of the examination? | The Applicant remains in helpful discussions with the MOD and is confident of reaching an agreed position with the MOD in relation to all matters during the examination. As such, the Applicant does not consider it likely that the scenario proposed by this Interested Party comes to fruition. |
| AM12 | **Ministry of Defence / RAF Marham objection Cont.**<br>(5) Could the applicant confirm whether any changes to panel specification, orientation, layout, or removal or the design or siting of new pylons have been made, or are proposed, specifically to address the MoD's radar interference and glint/glare concerns, and where in the application documents this is recorded? | The Applicant refers to its responses to **AM8 – AM11** above, which it considers provides a comprehensive response in relation to this question. |
| **Sharron Morgan (Comments on the Deadline 2 submissions and any other information requested by the ExA for Deadline 5) [REP3-102]** | | |

| Reference | Comments | Applicant's Response |
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| SM1 | **Grid Connection and Carbon Benefits – Question A1**<br>The Environmental Statement assumes the Scheme will become operational during 2033. The Applicant is asked to confirm:<br>a. the date used within the GHG calculations for first electricity export;<br>b. whether the calculations assume unrestricted export from commissioning onwards; and<br>c. whether any allowance has been made for delayed energisation resulting from National Grid transmission constraints or connection queue reform. | The Applicant is grateful to the Interested Party for their submission and has endeavoured to respond to the numerous questions posed to the Applicant in the corresponding rows below. Given that this submission is technical in nature, though, the Applicant politely requests that the Interested Party be kind enough to provide their credentials for the technical analysis that this submission comprises of (including in relation to the various data sources that are referenced throughout), in the same way that the Applicant has done for its Climate Change expert in **ES Appendix 1.1: Statement of Competence [APP-132]**.<br>In any event, **ES Chapter 13: Climate Change [REP1-040]** confirms at paragraph 13.4.7 that the Scheme is anticipated to energise in Q4 2033, or as early as National Grid can offer, with the assessment based on an anticipated energisation date of Q3 2033 for GHG accounting purposes (para 13.9.9). The lifetime generation output used in the assessment (37.22 TWh over the 60-year operational phase, Table 13-29) assumes unrestricted export from the point of energisation onwards; no allowance has been made within the GHG calculations for delayed energisation, or reduced/restricted export resulting from National Grid transmission constraints or connection queue reform.<br>Chapter 7 of the **Statement of Need [APP-042]** explains that the Scheme proposes to connect to a well-connected section of the National Energy Transmission System which has available transmission capacity and is geographically distant from areas of the network which currently are constrained. As such, transmission constraints are less likely to cause curtailment at the Scheme during its operational life than may be experienced at other locations. Further, the commissioning of a BESS (as is proposed as associated development to the Scheme) would allow the Scheme to provide its own operational flexibility to the electricity system, reducing the potential for transmission constraints to restrict exports.<br>The Applicant therefore considers the lifetime generation output used in the Climate Assessment is appropriate for the purposes of assessing the carbon benefits of the Scheme. |
| SM2 | **Grid Connection and Carbon Benefits – Question A2**<br>Given the well-documented transmission constraints affecting East Anglia, has the Applicant undertaken any sensitivity assessment based upon:<br>a. a 2-year grid connection delay;<br>b. a 5-year grid connection delay;<br>c. staged energisation;<br>d. temporary export restrictions; or<br>e. reduced export capacity?<br>If so, the revised carbon payback period and lifetime GHG savings under each scenario are requested. If not, an explanation is sought as to why such scenarios have not been assessed. | Paragraph 5.4.1 of **ES Chapter 5: The Scheme [REP1-032]** explains that the Scheme is anticipated to energise in Q4 2033 or as early as National Grid are able to offer, that construction phase will be up to 24 months, i.e. commencing 24 months before anticipated connection; and (Paragraph 5.5.1) that the operational phase of the Scheme is anticipated to be 60 years from the date of the final commissioning phase of the Scheme.<br>No sensitivity assessment has been undertaken modelling 2-year or 5-year grid connection delay, staged energisation, temporary export restriction, or reduced export capacity scenarios. The GHG assessment in **ES Chapter 13: Climate Change [REP1-040]** presents a reasonable worst-case, static assessment based on the anticipated Q3 2033 energisation date and unrestricted export thereafter, in line with ISEP guidance (Ref 13-6) which does not require multiple energisation-delay scenarios to be modelled.<br>It is noted that a delay to the anticipated grid connection date of the Scheme would not alter the Scheme's construction-phase embodied carbon emissions and would not materially alter the Scheme's operational-phase carbon benefits, because it would shift the whole construction-operation phase later rather than extend one and shorten the other. The Applicant does not consider this materially affects the conclusion that the Scheme delivers a net beneficial and significant effect over its 60-year operational lifetime, as set out at paragraphs 13.9.131–13.9.134.<br>The Applicant refers to its response to **SM1** above in relation to why it considers that its assessment is appropriate in relation to potential effects of temporary export restrictions (transmission constraints) to output.<br>The **Grid Connection Statement [APP-181]** explains that the Applicant has a grid connection agreement for 500MW with the National Energy System Operator. It does not therefore consider that a reduced export capacity (which would be a breach of that agreement) is a necessary or likely scenario requiring a sensitivity analysis to be carried out. |

| Reference | Comments | Applicant's Response |
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| SM3 | **Grid Connection and Carbon Benefits – Question A3**<br>The Applicant is asked to provide the calculated carbon payback period for the Scheme, showing:<br>a. construction emissions;<br>b. operational emissions;<br>c. avoided emissions; and<br>d. the year in which cumulative carbon savings are calculated to exceed lifecycle emissions. | The construction, operation, and decommissioning of energy infrastructure will inevitably lead to GHG emissions (e.g. embodied carbon in products, transport, replacements and end-of-life processing) and **ES Chapter 13: Climate Change [REP1-040]** quantifies these. However, the Scheme does not actively remove GHG emissions from the atmosphere. Significance is therefore judged on alignment with the net-zero trajectory and evidence that all reasonable measures to reduce emissions have been taken, not on achieving a particular "payback year". Over its 60-year operational phase generating 37.22 TWh (para 13.9.92), the Scheme demonstrates significant net carbon benefits when compared to grid-average generation, contributing meaningfully to UK carbon budgets and the Net Zero 2050 target (para 13.9.131-134).<br><br>To provide context on the Scheme's contribution to decarbonisation, **ES Chapter 13: Climate Change [REP1-040]** includes a transparent comparison between the Scheme's operational carbon intensity and electricity supplied by the UK grid in the Scheme's anticipated opening year (2033). The difference is presented as "avoided" grid emissions. This contextual comparison does not form part of the Scheme's GHG inventory and is not used to determine significance.<br><br>However, it is important to note that the DESNZ grid carbon intensity used for comparison does not include GHG emissions from imported materials as part of the UK's national inventory, i.e. the grid emissions considered are UK territorial emissions only. This means that the emissions generated outside of the UK territory are not accounted for in the DESNZ grid carbon intensity projections used to assess the Scheme savings.<br><br>In contrast, the Scheme's lifecycle assessment accounts for global embodied and freight emissions for products such as BESS (Battery Energy Storage Systems), PV modules, transformers, and cabling. This discrepancy results in an asymmetrical comparison that underestimates the Scheme's GHG savings. Specifically:<br><br>The Scheme's assessment includes: Global embodied carbon (e.g. BESS manufacturing in China: 264,000 tCO2e), international freight (29,380 tCO2e), and all lifecycle emissions (paragraph 13.9.107).<br><br>The DESNZ grid factor includes only UK territorial operational emissions from electricity generation.<br><br>This means the Scheme is assessed against a baseline that excludes the very emissions categories (embodied carbon, WTT, international supply chains) that dominate the Scheme's own inventory. The comparison therefore systematically understates the Scheme's carbon savings relative to grid-average generation.<br><br>Moreover, the GHG emissions methodology used in the assessment is limited in that it only compares electricity generated by the Scheme to the equivalent electricity available via the national grid. This approach does not fully account for the broader carbon benefits that accrue from the provision of renewable energy as part of an extensive electricity supply system.<br><br>The limited comparison of generated electricity against equivalent grid intensity ignores the broader benefits of displacing fossil fuel use in transport, heating, and industrial processes. In practice, the energy use from these sectors that the Scheme displaces may be significantly more carbon-intensive than the national grid at any given time. This means the carbon savings of the Scheme presented in **ES Chapter 13: Climate Change [REP1-040]** is likely to be much greater than estimated. |
| SM4 | **Supply Chain Emissions - Question B1**<br>The Environmental Statement includes embodied carbon figures for photovoltaic modules.<br>The Applicant is asked to identify:<br>a. the assumed country of manufacture;<br>b. the electricity grid carbon intensity used during manufacture; | a. The Applicant provided the country of manufacture in Section 13.4.12 in **ES Chapter 13: Climate Change [REP1-040]**. The assumed country of manufacture is China, specifically from LONGi Solar Technology Co (paragraph 13.4.12).<br>b. Section 13.9.93 of the **ES Chapter 13: Climate Change [REP1-040]** outlines the grid carbon intensity for the construction, operational and decommissioning phase is estimated to be 51.44 gCO2e/kWh. |

| Reference | Comments | Applicant's Response |
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| | c. the manufacturing database or lifecycle inventory used;<br>d. the assumed transport route; shipping emissions; and<br>e. road transport emissions. | c. Multiple databases and reports are used depending on material. Sections 13.9.9 – 13.9.104 of **ES Chapter 13: Climate Change [REP1-040]** outline the methodology used to calculate the total embodied carbon emissions from the manufacture, operation and decommissioning phases of the Scheme.<br>d. The Applicant provides the transport routes in Section 13.4.13 of **ES Chapter 13: Climate Change [REP1-040]**. Sea freight distance from China to England is assumed to be 24,582 km (Shanghai to King's Lynn).<br>e. Section 13.9.43, Table 13-16, in **ES Chapter 13: Climate Change [REP1-040]** provides the HGV GHG emissions from transport of materials. The total emissions from vehicle movements associated with the Scheme during the construction phase has been estimated as 6,096 tCO2e. |
| SM5 | **Supply Chain Emissions - Question B2**<br><br>Has the Applicant undertaken any sensitivity analysis comparing manufacture in China, Europe, or via lower-carbon manufacturing routes, and the effect of each upon lifecycle emissions? If not, an explanation is requested. | No sensitivity analysis has been undertaken comparing manufacture in China, Europe, or lower-carbon manufacturing routes. As set out at paragraph 13.4.13 in **ES Chapter 13: Climate Change [REP1-040]**, a conservative assumption has been applied whereby all materials are assumed to be shipped from China, representing the furthest plausible manufacturing origin and therefore a reasonable worst-case for transport-related emissions. In practice, the Applicant would seek to source materials and products locally or from closer manufacturing hubs where feasible, meaning actual emissions are more likely to be lower than reported. |
| SM6 | **Supply Chain Emissions - Question B3**<br><br>The Applicant is asked to provide the embodied carbon contribution, expressed in tonnes CO2e, separately for:<br><br>a. PV modules;<br>b. aluminium frames;<br>c. steel supports;<br>d. transformers;<br>e. inverters;<br>f. battery storage;<br>g. substations;<br>h. underground cables;<br>i. concrete; and<br>j. fencing. | a. The Applicant provides, in **ES Chapter 13: Climate Change [REP1-040]** Table 13-22, that the embodied carbon emissions for PV modules are 8,785 tCO2e.<br>b. The Applicant provides, in **ES Chapter 13: Climate Change [REP1-040]** section 13.9.17, that the embodied carbon emissions for aluminium are 36,819 tCO2e.<br>c. The Applicant provides, in **ES Chapter 13: Climate Change [REP1-040]** Section 13.9.19, that the embodied carbon emissions for steel supports are 45,211 tCO2e.<br>d. The Applicant provides, in **ES Chapter 13: Climate Change [REP1-040]** Table 13-22, that the embodied carbon emissions for transformers are 2,410 tCO2e.<br>e. The Applicant provides, in **ES Chapter 13: Climate Change [REP1-040]** Section 13.9.29, that the embodied carbon emissions of the inverters are 2,990 tCO2e.<br>f. The Applicant provides, in **ES Chapter 13: Climate Change [REP1-040]** Section 13.9.36, that the embodied carbon emissions for the batteries in totality are 264,000 tCO2e.<br>g. Table 13-12 in **ES Chapter 13: Climate Change) [REP1-040]** presents embodied carbon emissions data for key substation components, including transformers and switchgear.<br>h. The Applicant provides, in **ES Chapter 13: Climate Change [REP1-040]** Section 13.9.33, that the embodied carbon emissions associated with the underground cables are 1,107 tCO2e, derived from the three materials comprising the cables (copper, aluminium and polyethylene).<br>i. According to the ISEP guidance, activities that do not significantly change the result of the assessment can be excluded where the expected emissions are less than 1% of the total emissions, and where all such exclusions total a maximum of 5% of the total emissions. In the case of the GHG assessment, the emissions associated with ancillaries (including concrete) are considered minor and are expected to contribute less than 1% of the total emissions.<br>j. According to the ISEP guidance, activities that do not significantly change the result of the assessment can be excluded where the expected emissions are less than 1% of the total emissions, and where all such exclusions total a maximum of 5% of the total emissions. In the case of the GHG assessment, the emissions associated with ancillaries (including fencing) are considered minor and are expected to contribute less than 1% of the total emissions. |
| SM7 | **Battery Energy Storage System - Question C1**<br><br>The Applicant is asked to confirm:<br><br>a. the battery chemistry assumed;<br>b. the expected operational lifespan of the BESS; | a) The assumed battery chemistry is Lithium-Ion.<br><br>b) The assessment assumptions set out in Section 13.4 of **ES Chapter 13: Climate Change [REP1-040]** assume an operational lifespan of up to 10 years for each BESS. It is assumed that there will be up to 5 BESS replacements during the 60 year operational lifespan of the Scheme. |

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| | c. the number of battery replacements assumed over the project lifetime; and<br>d. the embodied carbon associated with each replacement. | c) The assessment assumptions set out in Section 13.4 of **ES Chapter 13: Climate Change [REP1-040]** assume that the BESS batteries could be replaced up to five times during the operational phase.<br><br>d) The assessment sets out, in Section 13.9.90, Table 13-26 of **ES Chapter 13: Climate Change [REP1-040]**, the embodied carbon associated with each of the replacements. |
| SM8 | **Battery Energy Storage System - Question C2**<br><br>The Applicant is asked to provide the evidence base supporting the assumed battery recycling rates, and to confirm whether transport emissions associated with recycling have been included within the assessment. | Under current UK legislation, end-of-life BESS infrastructure is controlled under The Waste Batteries and Accumulators Regulations 2009. These require battery producers to receive, sort, and suitably handle batteries and deliver to an approved battery treatment operator for treatment and recycling. This requirement will be secured ahead of the Scheme's operational phase, based on the detail provided in the **oOEMP [APP/7.8.4]**, to ensure it is undertaken as legally required throughout the operational phase of the Scheme.<br><br>An estimated 80% recycling or recover rate for BESS has been included in **ES Chapter 16: Other Environmental Matters [REP3-034]** (Section 16.9: Waste). This is based on reported recovery rates of 80-90% from existing companies working in the battery / ESS recovery sector in the UK, such as but not limited to RSBruce, Recover, Ennovus, and Recyclus Group. Whilst these are self-reported figures by private companies, these are consistent with legislative limits being enshrined in the European Union through Regulation EU 2023/1542 concerning batteries and waste batteries. At Annex XII therein, prescriptive targets for recycling and material recovery from batteries are given. The Applicant assumes that the either the UK government will adopt these or similar targets into UK law, or BESS suppliers and recycling firms operating across the EU and UK will adopt these targets across both areas. The most pertinent are:<br><br>• Part B: Targets for recycling efficiency; 2. No later than 31 December 2030, recycling shall achieve at least the following targets for recycling efficiency: (b) recycling of 70 % by average weight of lithium-based batteries; and<br><br>• Part C: Targets for recovery of materials; 2. No later than 31 December 2031, all recycling shall achieve at least the following targets for recovery of materials: (d) 80% for lithium.<br><br>**ES Chapter 13: Climate Change [REP1-040]** assesses greenhouse gas (GHG) emissions across the full life cycle of the Scheme, including the embodied carbon associated with materials and components, transport of materials, installation, operation, maintenance and decommissioning of Scheme. While the decommissioning-phase calculations do not explicitly isolate "transport emissions associated with recycling" as a distinct line item, these are captured within the total HGV and worker movement emissions reported for the decommissioning phase (Table 13-27). |
| SM9 | **Battery Energy Storage System - Question C3**<br><br>Has any sensitivity analysis been undertaken on the basis that battery replacement may be required earlier than currently anticipated? | Lithium Iron Phosphate (LFP) cells have between 4000 - 10000 cycles before the capacity degrades to 70-80%. A cycle being a full discharge followed by a full charge. Given that the modus operandi envisaged is, at most, 2 cycles per day, it is conceivable that, at worst, the batteries will be at peak capacity for 2000 days of operation minimum. This equates to 5.5 years of operation. A median number of cycles, 7000, would extrapolate out to approximately 9.5 years of operation.<br><br>No formal sensitivity analysis modelling earlier battery replacement has been undertaken in **ES Chapter 13: Climate Change [REP1-040]**. The 10-year design life adopted at paragraph 13.9.70 was selected based on manufacturer guidance available at the time of assessment and was considered representative of the expected operational performance of LFP battery systems.<br><br>Notwithstanding this, the greenhouse gas assessment already adopts a conservative approach by assuming up to five battery replacements over the 60-year operational lifetime of the Scheme (paragraph 13.4.22). This equates to an average replacement interval of approximately 10 years. Consequently, the assessment already |

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| | | accounts for multiple replacement events throughout the operational phase and is considered sufficiently precautionary. |
| SM10 | **Soil Carbon - Question D1**<br><br>Paragraph 13.7.2 of the Environmental Statement states that, as a conservative approach, baseline agricultural activities have been assumed to generate zero CO2e. The Applicant is asked to explain:<br><br>a. the basis on which agricultural emissions have been assumed to be zero;<br>b. whether existing soil carbon stocks on the Site have been quantified; and<br>c. whether projected changes in soil organic carbon have been modelled. | Baseline agricultural emissions were assumed to be zero CO2e as a conservative approach, because the assessment does not seek to credit the Scheme with any reduction in emissions arising from changes to existing agricultural activities. In reality, the baseline comprises existing carbon stock and sources of GHG emissions within the Site from the existing activities.<br><br>Existing soil carbon stocks within the Site have not been quantified as part of the greenhouse gas assessment. Similarly, projected changes in soil organic carbon have not been modelled. The assessment therefore does not seek to account for either potential increases or decreases in soil carbon stocks that may result from operation of the Scheme. As a result, the assessment presents a conservative position and does not rely on any potential soil carbon benefits in reaching its conclusions. |
| SM11 | **Soil Carbon - Question D2**<br><br>The Applicant is asked to provide:<br><br>a. baseline soil carbon storage;<br>b. predicted soil carbon following construction;<br>c. predicted soil carbon after 10 years of operation;<br>d. predicted soil carbon after 30 years of operation; and<br>e. predicted soil carbon following decommissioning. | The information requested is not available. Soil carbon storage and predicted soil carbon was not required for this assessment as all baseline agricultural emissions were assumed to be zero CO2e as a conservative approach. The greenhouse gas assessment presented in **ES Chapter 13: Climate Change [REP1-040]** did not include quantification of baseline soil carbon stocks or modelling of changes in soil carbon over the lifetime of the Scheme.<br><br>As explained in the Applicant's response to **SM10** above, the climate change assessment adopted a conservative approach and did not account for potential changes in soil carbon stocks. The assessment therefore does not rely upon potential soil carbon sequestration benefits in reaching its conclusions.<br><br>The Applicant also refers to responses AM13 and AM14 in the **Applicant's Response to Written Representations and other Deadline 1 Submissions [REP2-028]** in relation to these matters. |
| SM12 | **Soil Carbon - Question D3**<br><br>The Applicant is asked to confirm whether permanent changes in soil structure arising from driven piles, access tracks and other construction activities have been incorporated into the lifecycle assessment. | Permanent changes in soil structure arising from driven piles, access tracks and other construction activities have not been explicitly quantified or incorporated into the lifecycle greenhouse gas assessment within **ES Chapter 13: Climate Change [REP1-040]**. All baseline agricultural emissions were assumed to be zero CO2e as a conservative approach, as the assessment does not seek to credit the Scheme with any reduction in emissions arising from changes to existing agricultural activities.<br><br>The Applicant also refers to responses AM13 and AM14 in the **Applicant's Response to Written Representations and other Deadline 1 Submissions [REP2-028]** in relation to these matters. |
| SM13 | **Construction Traffic – Question E1**<br><br>The Applicant is asked to confirm whether the GHG assessment includes emissions arising from imported construction materials, abnormal loads, construction workforce travel, maintenance vehicles, waste removal and excavated soil removal. | **ES Chapter 13: Climate Change [REP1-040]** estimates in Section 13.9.42 that there will be approximately 3,191 two-way HGV trips to the Site during the construction phase associated with the transport of materials. This considers trips from China. The total road distance (130 km) was estimated from industrial areas around Shanghai, and then from King's Lynn to the Site. A conversion factor for 'All HGVs, 50% Laden' was used to account for variation in HGV types and for differences in HGV load during delivery to and from the Sites. The total emissions from vehicle movements associated with the Scheme during the construction phase has been estimated as 6,096 tCO2e. |
| SM14 | **Construction Traffic – Question E2**<br><br>Where excavated material cannot be reused on Site, the Applicant is asked to provide:<br><br>a. the maximum volume of material requiring export;<br>b. the number of HGV movements required;<br>c. the haulage distances assumed; and | Section 13.9.46 of the **ES Chapter 13: Climate Change [REP1-040]** calculates ground material expected to be excavated which will not be suitable for refill or compaction at 157,693 $m^3$. Using a typical density value for mixed construction and demolition of 1.2 tonnes per $m^3$, and a conversion factor for average construction of 1.00835 kgCO2e/tonne, the total estimated emissions from excavation material waste have been calculated as 193.2 tCO2e. |

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| | d. the additional tonnes of CO2e generated as a result. | **ES Chapter 13: Climate Change [REP1-040]** estimates in Section 13.9.42 that there will be approximately 3,191 two-way HGV trips to the Site during the construction phase. However, the specific number of HGV movements and haulage distance assumed for exporting this excavated material is not separately reported within the Chapter. Regarding the methodology and assumptions to understand the number of overall HGV movements, to the Applicant refers to its response to **SM15** below.<br><br>The total emissions from vehicle movements associated with the Scheme during the construction phase has been estimated as 6,096 tCO2e. |
| SM15 | **Construction Traffic – Question E3**<br><br>Has contaminated soil disposal been assessed as a reasonable worst-case scenario within the GHG and traffic assessments? If not, the Applicant is asked to explain why not. | Within the construction traffic forecasts detailed within **ES Appendix 9.2: Traffic Assessment [APP-163]**, robust assumptions have been made to generate both the daily vehicle peak and daily HGV peak, with it assumed as a worst-case scenario that both of these vehicle peaks would overlap at the same time, when in reality they are likely to be separate and peak at different points throughout the programme.<br><br>The assessment within **ES Appendix 9.2: Traffic Assessment [APP-163]** also assumes that the peak in construction traffic would be consistent across the entirety of the construction programme, when in reality there would be periods that would be substantially below the peak. Notably, through the daily vehicle caps secured within the **oCTMP [AS-082]**, the daily level of vehicle activity cannot exceed the agreed caps without express agreement of the relevant local authorities and will be a requirement for the appointed contractor to comply with, being specified within their contract. Failure to comply with the requirements of a DCO is a criminal offence, so the cap would not be exceeded, with further information on how the cap will be monitored and reported on included within section 8 of the **oCTMP [AS-082].**<br><br>On that basis, if there is a need for contaminated soil removal, it would be the responsibility of the contractor to align these works with the wider construction works and ensure it does not exceed the agreed vehicle cap at any point, which could involve reprofiling deliveries or delaying certain Site activities to ensure the cap is adhered to at all times.<br><br>Contaminated soil disposal has not been separately assessed as a distinct reasonable worst-case scenario within the GHG assessment in **ES Chapter 13: Climate Change [REP1-040]**. The excavated material emissions figure (190.8 tCO2e, paragraph 13.9.46) assumes standard mixed construction and demolition factors, rather than a contaminated-waste-specific factor or extended haulage distance to a specialist disposal facility. |
| SM16 | **Green Transport Credentials - Question F1**<br><br>The Applicant is asked to confirm whether construction contractors will be contractually required to use Euro VI HGVs, HVO renewable diesel, electric construction plant, electric HGVs where available, hydrogen-powered equipment, and anti-idling monitoring. | Tables 3.11 and 4.11 of the **oCEMP [APP/7.6.4]** and **oOEMP [APP/7.8.4]** commit that:<br><br>'*All plant and vehicles will be required to switch off their engines when not in use and when it is safe to do so. In addition, plant and vehicles will conform to relevant applicable standards for the vehicle type as follows:*<br><br>• *Euro 4 (Oxides of Nitrogen (NOx)) for petrol cars, vans and minibuses*<br><br>• *Euro 6 (NOx and PM) for diesel cars, vans and minibuses; and*<br><br>• *Euro VI (NOx and PM) for lorries, buses, coaches and Heavy Goods Vehicles (excluding specialist abnormal indivisible loads).'* |
| SM17 | **Green Transport Credentials - Question F2**<br><br>The Applicant is asked to identify any contractual carbon reduction requirements to be imposed upon haulage contractors. | The Applicant has set out carbon reduction measures to be implemented during the construction and operational phases of the Scheme within Tables 3.9 and 4.9 of the **oCEMP [APP/7.6.4]** and the **oOEMP [APP/7.8.4]**. |

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| SM18 | **Green Transport Credentials - Question F3**<br><br>Will contractors be required to report actual construction emissions during the construction period, and if so, how will this be secured and monitored? | Appointed contractors are obliged to comply with DCO requirements, including adherence to all of the commitments within the secured management plans. The detailed CEMP will set out the control measures for GHG emissions from construction traffic and equipment. This will form part of the contractor's adherence to the various Environmental, Social and Governance (ESG) targets set out by the Applicant/operator. |
| SM19 | **Climate Assessment Methodology - Question G1**<br><br>The GHG assessment compares Scheme emissions against forecast future grid carbon intensity. The Applicant is asked to explain how the assessment, and its conclusions, would remain valid should the UK electricity grid decarbonise more rapidly than forecast. | The Applicant's assessment of significance is not solely dependent on the comparison to forecast grid carbon intensity. As set out in ISEP guidance (paragraph 13.6.17 of **ES Chapter 13: Climate Change [REP1-040]**), significance is determined by whether the Scheme contributes to reducing GHG emissions relative to a trajectory consistent with net zero by 2050, rather than by the specific comparative margin against a forecast grid baseline at any point in time. The Scheme's own operational carbon intensity (39.63 gCO2e/kWh, paragraph 13.9.96) is assessed against carbon budgets (Table 13-23, Table 13-28) which are independent of grid decarbonisation speed, and the Scheme's contribution to enabling downstream electrification (paragraphs 13.9.120–13.9.130) remains valid regardless of the pace of grid decarbonisation. The conclusion of a Beneficial and Significant effect (paragraph 13.9.134) is therefore considered robust to this uncertainty.<br><br>This is consistent with the Secretary of State's Decision Letter for the One Earth DCO (EN010159) of July 2026 which discusses, at paragraphs 4.65 – 4.69, the carbon benefits of the One Earth development against different grid average carbon intensities and concludes that he is "*satisfied that the Proposed Development would result in carbon savings during operation and would support the trajectory to net zero.*"<br><br>Section 2.9 of the **Statement of Need [APP-042]** describes that delivering the Clean Power 2030 Action Plan would pave the way to decarbonising the wider economy by 2050 as the electrification of heat in buildings, transport, and industry is pursued, thereby leading to an expected rapid growth of power demand over the 2030s and 40s. Further, section 4.4 of the **Statement of Need [APP-042]** illustrates the significant carbon reductions which will be delivered by swapping fossil fuels for electricity in cars and homes. These emission reductions will only be delivered if supplies of low-carbon electricity increase to meet growing demand. For this reason, the need for new clean power does not stop at 2030, and a more rapid grid decarbonisation than forecast, if delivered, does not diminish the need for or the benefits delivered by the Scheme. |
| SM20 | **Climate Assessment Methodology - Question G2**<br><br>The Applicant is asked to provide a sensitivity assessment using:<br><br>a. current DESNZ marginal grid emissions factors;<br>b. an accelerated decarbonisation scenario; and<br>c. a slower decarbonisation scenario. | The Applicant refers to its response to **SM19** above. |
| SM21 | **Carbon Budgets - Question H1**<br><br>The Applicant is asked to quantify the percentage contribution of the Scheme's construction emissions against (a) the relevant UK Carbon Budget, and (b) the Electricity Supply Sector Carbon Budget. | The Applicant refers to Tables 13-23 and 13-28 of **ES Chapter 13: Climate Change [REP1-040]** which set out the construction emissions for the Scheme in relation to the relevant UK and sectoral carbon budgets. |
| SM22 | **Carbon Budgets - Question H2**<br><br>The Applicant is asked to explain whether delayed energisation of the Scheme would alter its compliance with, or contribution to, those carbon budgets. | Delayed energisation would not change the Scheme's total construction-phase emissions, as these are determined by the materials and activities required for construction, rather than the timing of delivery. However, it would change the period in which those emissions occur. As the annual Electricity Supply Sectoral Carbon Budget reduces over time, a delay may increase the Scheme's relative contribution to the annual budgets reported in the assessment within **ES Chapter 13: Climate Change [REP1-040]**.<br><br>A delay would defer the start of operational-phase carbon savings (paragraphs 13.9.108 – 13.9.116), reducing the portion of the Scheme's net benefit realised within the currently-quantified 5th/6th/7th Budget periods |

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| | | (2028–2042), and pushing more of that benefit into future budget periods. The Scheme itself is not responsible for achieving compliance with UK carbon budgets, which are set and monitored at a national level.<br><br>No quantified delay sensitivity assessment has been undertaken. The Applicant's position is that a modest delay would not alter the overall Beneficial and Significant conclusion (paragraph 13.9.134), as the Scheme would continue to provide substantial renewable electricity generation and associated lifecycle greenhouse gas savings over its operational lifetime. |
| SM23 | **Comparative Lifecycle Emissions: Solar, Wind and Small Modular Reactors**<br><br>(…) The Applicant is invited to confirm whether it agrees with this comparative data and, if not, to provide its own sourced figures.<br><br>**Lifecycle Greenhouse Gas Intensity - Question I1**<br><br>[A table summarising published median/central lifecycle GHG intensity estimates by technology is provided]<br><br>The Applicant is asked to confirm whether the module-manufacturing assumptions used in the Scheme's own embodied carbon calculations (see Section B above) fall within, above, or below the published range for solar PV set out above, and to explain any material deviation. | The Applicant refers to Table 13-8 of **ES Chapter 13: Climate Change [REP1-040]** which sets out the Applicant's assessment of the Lifecycle GHG Emissions of different Electricity Sources. |
| SM24 | **Typical Capacity (Load) Factors - Question I2**<br><br>The Applicant is asked to confirm the capacity factor assumed for the Scheme and to state how this compares with the following published typical UK figures [A table summarising published median/central lifecycle GHG intensity estimates by technology is provided].<br><br>(…) the Applicant is asked to confirm how the Scheme's claimed carbon payback period and lifetime GHG savings (see Question A3) account for the comparatively lower annual energy yield per hectare and per MW installed, relative to these alternative low carbon technologies.<br><br>**Land Use Intensity - Question I3**<br><br>The Applicant is asked to provide the Scheme's generation output per hectare (MWh/ha/year) and to state how this compares with published land-use intensity figures for onshore and offshore wind and nuclear/SMR generation, in order to assist the Examining Authority in weighing the Scheme's land-take (approximately 840 hectares) against its lifetime generation output. | **Question I2.**<br><br>The Applicant refers to Table 8.1 of the **Statement of Need [APP-042]** which sets out a comparison of assumed load factors with independent data sources for onshore wind, offshore wind and solar generation technologies.<br><br>Paragraph 8.5.23 of the **Statement of Need [APP-042]** includes the Applicant's Capacity Factor assumption for all low-carbon baseload technologies in aggregate (50.6% in summer, 54.1% in winter). These values incorporate the Applicant's assumption for nuclear facilities alone, and although not specifically stated in the **Statement of Need [APP-042]**, the Applicant can confirm that its assumed nuclear generation capacity factor lies within the range included in this representation.<br><br>The Applicant confirms that the Scheme's carbon payback period and lifetime GHG savings are a function of the Scheme's estimated carbon costs and carbon benefits, and are not a function of the energy yields of other low-carbon technologies.<br><br>**Question I3.**<br><br>Section 6.7 of the Statement of Need provides the Applicant's assessment of generation output per hectare per year for solar technology when compared to selected other technologies. The Applicant concludes that *"solar can generate between 25 and 50 times the energy output per unit area of growing crops for energy. By following good design principles, solar schemes can generate a similar amount of energy per hectare of land as onshore wind."*<br><br>The Applicant has not provided a comparison of the Scheme's generation output per hectare against land-use intensity figures for offshore wind because the Applicant does not deem these technologies to be in competition with each other for land use. Paragraph 3.3.20 of NPS EN-1 states that *"A secure, reliable,* |

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| | | *affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar".* Figure 8-2 of the **Statement of Need [APP-042]** and associated narrative provides evidence explains that without solar, an even larger national wind-only portfolio would be required to deliver an appropriate level of reliability.<br><br>The Applicant has not provided a comparison of the Scheme's generation output per hectare against land-use intensity figures for nuclear schemes. Section 5.6 of the **Statement of Need [APP-042]** explains that Great British Nuclear is aiming to support the first SMR schemes to deliver, at best, in the mid-2030s. No new nuclear sites have yet been permitted for either large or small-scale reactors, implying that any trailblazer schemes which may deliver in comparable timeframes to the Scheme, may only be located on sites with existing nuclear permits, and are therefore not available for the development of renewable facilities. |
| SM25 | **Status of Comparator Technologies - Question I4**<br><br>The Applicant is asked to confirm whether, in preparing the Environmental Statement, any assessment was made of the relative merits of delivering equivalent low-carbon generation capacity through offshore wind or SMR deployment, and if so, to summarise the conclusions reached. If no such assessment was undertaken, the Applicant is asked to explain why not, noting that the Government's overarching National Policy Statements for energy infrastructure treat solar, wind and nuclear as complementary rather than mutually exclusive means of achieving Net Zero, and that this comparative context may assist the Examining Authority in assessing the necessity and proportionality of the Scheme's land take. | The Applicant notes that it is a solar and BESS developer and as such is proposing a solar and BESS scheme. However, the Applicant has set out its assessment of other generation technologies within the **Statement of Need [APP-042]** and the **ES Chapter 4: Reasonable Alternatives and Design Evolution [REP3-028]**. Table 2.1 of the **Statement of Need [APP-042]** shows that the government has set challenging capacity ranges for the development of new capacity of all low-carbon technologies to achieve its Clean Power target. This supports the Applicant's view (which is consistent with NPS EN-1 paragraph 4.3.24) that schemes of other generation technologies should not be considered as alternatives to the Scheme, because they may also be needed. Further, paragraph 3.3.20 of NPS EN-1 states that *"A secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"*, demonstrating the government's strong support for established and deliverable renewable generation technologies to come forward alongside other technologies to deliver Clean Power on the way to achieving Net Zero by 2050. |
| SM26 | **Whole-Life Carbon Transparency**<br><br>The Applicant is asked to provide a full lifecycle carbon table, expressed in tonnes CO2e, showing separately: manufacturing; shipping; road transport; construction machinery; concrete; steel; aluminium; battery manufacture; maintenance; inverter replacement; battery replacement; decommissioning; recycling; and avoided emissions. | Construction, operational and decommissioning embodied carbon emissions are presented in **ES Chapter 13: Climate Change [REP1-040]** Table 13-22, Table 13-26 and Table 13-27. "Avoided emissions" are not presented as a discrete line item within these lifecycle tables, as this comparison is treated as contextual information only (paragraphs 13.9.108–13.9.116) rather than forming part of the Scheme's GHG inventory. Shipping (Table 13-14) and worker/HGV transport are reported separately, rather than embedded within material categories. |
| SM27 | **Residual Uncertainty**<br><br>The Applicant is asked to identify the five largest sources of uncertainty within the greenhouse gas assessment and to quantify the possible variation each could introduce into the final lifecycle emissions figures. | The Applicant considers the overall methodology presented in **ES Chapter 13: Climate Change [REP1-040]** employs a conservative methodology that accounts for all residual uncertainties, such that these uncertainties are more likely to result in lower actual emissions than reported, rather than higher. |

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