East Pye Solar

Consultation Report Appendix 11: Section 42 Applicant Response Table

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Contents

1 Section 42 Applicant Response Table – Phase Two Consultation 4
1.1 Aplington with Yelverton Parish Council 4
1.2 Wacton Parish Council 5
1.3 Topcroft Parish Council 6
1.4 Royal Mail Group 8
1.5 Norfolk Rivers Internal Drainage Board 10
1.6 NATS Safeguarding 13
1.7 National Gas 14
1.8 Health and Safety Executive 15
1.9 Kirstead Parish Council 18
1.10 Hedenham Parish Meeting 22
1.11 Hempnall Parish Council 36
1.12 National Highways 41
1.13 Historic England 48
1.14 National Grid Electricity Transmission 61
1.15 Saxlingham Nethergate Parish Council 65
1.16 Suffolk County Council 69
1.17 Shotesham Parish Council 81
1.18 Woodton Parish Council 88
1.19 Anglian Water 95
1.20 Environment Agency 106
1.21 Natural England 146
1.22 Norfolk County Council 164
1.23 Norfolk Wildlife Trust 224
1.24 Wacton Parish Council 252
1.25 Forestry Commission 252
1.26 Seething Parish Council 262
1.27 South Norfolk Council 268
2 Section 42 Applicant Response Table – Targeted Consultation 301
2.1 Anglian Water 301
2.2 Forestry Commission 305
2.3 Hempnall Parish Council 305
2.4 Norfolk County Council 314
2.5 Norfolk Wildlife Trust 333
2.6 Saxlingham Nethergate Parish Council 335
2.7 Seething Parish Council 344
2.8 South Norfolk Council 345
2.9 Stoke Holy Cross Parish Council 349
2.10 Suffolk County Council 352
2.11 Shotesham Parish Council 353

2.12 Woodton Parish Council 362
2.13 Natural England 365

1 Section 42 Applicant Response Table – Phase Two Consultation

1.1 Aplington with Yelverton Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Reasons able Alternative and Design Evolution	Our main concern is the sheer scale of this project. It's not only the areas that will be used for the solar panels, substations, and BESS but the amount of land that will be used for the Cable Route Corridors (CRC).	Yes	Since Phase Two consultation and the targeted consultation, the Applicant has undertaken further refinement of the Scheme design in line with the iterative design process (including the refinement of the CRC). This has resulted in a number of reductions to the Scheme boundary, as set out in **ES Volume 1, Chapter 5 - Alternatives and Design Evolution [EN0110014 /APP/6.1.5]**. Notable removals of land from the Solar PV sites following statutory consultation are listed in that chapter, with all removals shown in Table 5.1: Summary of key design changes through the Evolution of the Scheme.
Cable Route Corridor	You state the CRC will be a maximum of 50m wide, but we presume whilst it's under construction the whole of the fields in which it is situated will be out of use for farming purposes.	No	As noted in **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]**, the indicative working width of the CRC is 25m. Following the installation of the cable route and temporary construction compounds, the area would be reinstated.
Transport and Access	Although our parish isn't directly impacted by this, during the construction phase (which is likely to last two years) anyone living in the surrounding area is likely to suffer from disruption to local roads and routes into and out of the area on the A140 and Bungay Road and other smaller roads. We should also draw attention to the likelihood of further disruption from the proposed major work putting in new pylons for the major upgrade to the grid proposed by the National Grid.	No	The **ES [EN0110014/APP/6.1]** identifies the transport and access study area which includes an assessment of all highway links within it. Vehicle routeing has been designed to seek to avoid sensitive receptors where possible, and appropriate mitigation and management measures have been identified in the **ES Volume 1, Chapter 7 - Transport and Access [EN0110014/APP/6.1.7]** and **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]** to accommodate this. The ES provides a cumulative assessment of effects in association with other major developments in the area including Norwich to Tilbury DCO. These developments have been agreed with Norfolk County Council. A list of proposed schemes that overlap the Order Limits or are located close enough to the Scheme that they have the potential to generate significant cumulative effects have been identified in **ES Chapter 2, Figure 2 - Cumulative Developments [EN0110014/APP/6.2.2.1]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Compulsory Purchase / Acquisition	Whilst there is no mention this in your literature, we understand that some residents in Hempnall, Tasburgh and Saxlingham have been sent letters from Island Green Energy saying that their properties may be subject to Compulsory Purchase Orders. Whether this will be necessary if the project is approved remains to be seen, but this will be a source of great concern for these people and blight the local property market.	No	The Applicant acknowledges that the wording in letters sent to landowners and properties containing the LIQs may have caused concern and confusion. The Applicant provided further information regarding this process in a letter to properties on 9 July 2025. This letter reassured landowners that the Applicant does not intend to seek compulsory acquisition powers for any homes or buildings and that this has never formed part of the proposal. The Applicant's preference is to secure necessary land rights under voluntary agreement. However, it is standard practice for developers of NSIPs to seek compulsory acquisition powers to ensure delivery of the project in absence of those agreements.
Cumulative Impact	Our local MP Ben Goldsborough has previously said he supports this project but in a recent news article regarding a further large solar farm proposal for South Norfolk he stated that he was concerned about the number of solar projects proposed "carpeting South Norfolk in solar panels".	No	The Applicant notes this comment.

1.2 Wacton Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Landscape and visual	We do not wish to see our area blighted by this application and the danger it will provide to parishioners, local economy and local wildlife which is our main concern along with the	No	Concerns raised in this submission have been noted by the Applicant. Impacts on the local economy have been assessed in **ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14]**. During the construction and operational phase, the Applicant will implement employment and skills measures

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	procedural issues detailed in the main document.		designed to maximise local benefit from the Scheme. These will include the creation of apprenticeships and trainee opportunities. This is detailed further in an **Outline Employment, Skills and Supply Chain Strategy (OESSCS) [EN0110014/APP/7.10]**. Effects on wildlife have been assessed in detail in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]**, and ecological measures such as wildlife enhancement features, Skylark mitigation, Ghost Pond restoration and community accessible spaces are detailed in the **Outline Landscape and Ecology Management Plan (OLEMP) [EN0110014/APP/7.4]**, a detailed version of the management plan wo;; be created prior to the implementation of the Scheme and is secured via a Requirement within the **draft DCO [EN0110014/APP/3.1]**.

1.3 Topcroft Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Landscape and visual	In general terms Rural River Valley LCAs (e.g. Market Lane, Shotesham and Fairstead Lane, Hempnall) are considered more sensitive to solar PV proposals than plateau farmland LCAs (e.g. the area around Tivetshall / Great Moulton). Therefore, the danger for all of us fighting the East Pye proposal in its entirety is that while it may help some parishes to build a case for certain fields to be excluded the developer could seek to replace those lost fields by including extra sites elsewhere.	No	The Applicant notes this.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Cumulative Impact	*"The study relates to the following solar photovoltaic schemes: "small scale up to 5MW, medium-field scale up to 15MW, and larger-scale 15to 50MW" i.e. it does not specifically cover NSIPS - however it states that part of the funding for the project: "has enabled the council to commission a study to assess the sensitivities and capacities of the various landscapes of South Norfolk district to accommodate energy-related NSIP and non-NSIP projects."* So, it does mention a relevance to NSIP projects. Furthermore, it does not specifically say (at any point in the text) that NSIP schemes should be considered unacceptable due to their huge impacts on the South Norfolk landscape.	Yes	The assessment of cumulative scheme is set out within the technical chapters of the (**ES: Chapters 6 - 18 [EN0110014/APP/6.1.6 - 6.1.8]**), with the full list of cumulative schemes assessed provided in **ES: Appendix 2.4 Cumulative Schemes [EN0110014/APP/6.1.6 - 6.3.2.4]** which sets out the approach to identifying cumulative schemes.
Landscape and Visual	*4) The parameters assumed in the study include coverage of the impacts of : "Ground mounted panels up to a maximum of 4m high"* (this should be 4.5 metres) and a: "*25 year life, followed by full decommissioning and removal of all structures and a return to an agricultural land use or habitat creation typical of the LCA"* (East Pye is 40 to 60 years). The study also fails to take account of the fact that the threshold for NSIP schemes is increasing from 50mw to 100mw and therefore in the near future it will be LPAs like SNC that will be covering solar PV applications up to 100mw - the sensitivity analysis conducted in this study does not cover the 50mw to 100mw range. The document should not be adopted until this range of potential developments is included.	No	The Applicant notes this.

1.4 Royal Mail Group

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and Access	Royal Mail has 5 operational sites within 10 km of the proposed solar farm and associated infrastructure, including at the following locations (with approximate distances to the route): • Long Stratton SUDO – c. 1km • Framlingham Earl PAR – c. 4.9km • Bungay DO – 5.5km • Diss DO/FPO – 10km • Diss RTW/ST – 10km Every day, in exercising its statutory duties Royal Mail vehicles use the A140, B1527 and other roads which may potentially be affected by the construction phase of the scheme. Any periods of road disruption / closure, night or day, on or to the surrounding highway network has the potential to impact operations and may consequently disrupt Royal Mail's ability to meet its Universal Obligation service delivery targets. The construction works for this solar scheme will be of a scale, nature and duration that has potential to impact Royal Mail's road-based distribution and delivery services. Advanced knowledge of any Traffic Management, road closures or other works affecting the public highway, its capacity or journey times is usually the key to enable Royal Mail to manage impacts on its operations and business. To this end Royal	No	The Applicant notes this point. During construction of the Scheme, temporary amendments to the operation of the road network will be the subject of notices through the NCC Highways Street Works permitting procedures. Works will be published on the One.Network database. **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]** details temporary amends to the road network including closures. Measures contained within the detailed CTMP will be secured via a Requirement in the DCO. The operational period of the Scheme would not materially affect the operation of the road network.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	Mail will require commitment to advanced notification of works affecting the highway by East Pye Solar Ltd or its contractors.		
Transport and Access	Royal Mail supports East Pye Solar and does not wish to stop or delay the construction works for this important infrastructure project from occurring. However, Royal Mail does wish to ensure the protection of its future ability to provide an efficient mail sorting and delivering service to the public in accordance with its statutory obligations.	No	The Applicant makes note of this comment. The operational period of the Scheme would not materially affect the operation of the road network.
	In order to protect Royal Mail's position, it is requested that the draft Construction Traffic Management Plan includes the following mitigations, which if included would address Royal Mail's concerns: 1. a requirement that during the construction phase Royal Mail is notified by East Pye Solar Ltd or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working; 2. where road closures / diversions are proposed, East Pye Solar Ltd or its contractors should be required to liaise and consult with Royal Mail at least two month in advance to identify and make available alternative highway routes for operational use, where possible; and 3. a mechanism that informs Royal Mail about any other works affecting the local highways network (having regard in particular to the above identified	Yes	The Applicant has prepared **an Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]**. This provides an indication of a construction programme which will be refined through the development of a detailed CTMP, to be secured through a Requirement of the DCO. South Norfolk Council (SNC) as the relevant planning authority will approve the CTMP in consultation with Norfolk County Council (NCC) as a relevant planning authority. NCC Highways is anticipated to be responsible for discharging the detailed CTMP. During construction of the Scheme, temporary amendments to the operation of the road network will be the subject of notices through the NCC Highways Street Works permitting procedures – including the submission of Provisional Advance Authorisation (PAA) notices three months in advance of major works. Permit applications will be made in accordance with the process adopted by NCC Highways (Major Works - 10 days prior; Standard works - three days; and Minor works – two days prior). Works and permit consents will be published on the One.Network database. The operational period of the Scheme would not materially affect the operation of the road network.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	operational Royal Mail sites in the area surrounding the proposed new electricity transmission line)		

1.5 Norfolk Rivers Internal Drainage Board

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Water Environment	The outline Surface Water Drainage Strategy within the project's Flood Risk Assessment (Appendix 9.1 of the Preliminary Environmental Impact Report) proposes that for the majority of the development (including the PV array sites), surface water is disposed of via infiltration. We recommend that the viability of this proposal is evidenced. We would therefore recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.	Yes	Infiltration testing will be undertaken across the Order Limits post consent. The majority of the Scheme consists of Solar PV Arrays which are raised above the ground on narrow supports. As such, the natural ground cover is retained and improved through grass cover, allowing the natural percolation through the soil to continue as per the existing scenario. Further information is provided in **ES Volume 3, Appendix 9.1 Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Water Environment	It is noted that the use of formalised shallow infiltration drainage features (permeable surfaces/infiltration trenches) may be feasible for substations (excluding the National Grid substation), and that this will be supported by ground investigations including infiltration testing to BRE 365 standards.	Yes	It is assumed that the BESS and all Project Substations will be lined with an impermeable membrane for pollution management purposes and as such will not infiltrate to ground. Further information is provided in **ES Volume 3, Appendix 9.1 Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	For the substations, BESS and National Grid substation, it is noted that a strategy wholly reliant on infiltration is not viable and a controlled surface water discharge is proposed to a watercourse. Should the receiving watercourse lie within the watershed catchment of the Board's IDD then we request that this be in line with the National standards for sustainable drainage systems (SuDS). Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.	Yes	The surface water drainage strategy for the BESS and Substations has been prepared in accordance with the National Standards for SuDS. Further information is provided in **ES Volume 3, Appendix 9.1 Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Water Environment	If the development does propose to discharge water into the internal Drainage District of the IDB, the Board's consent may be required under Byelaw 3 and we would welcome consultation early in the drainage design process.	No	The Applicant notes this comment. Amongst other things, the **draft DCO [EN0110014/APP/3.1]** disapplies the provisions of any byelaws made under section 66 (powers to make byelaws) of the Land Drainage Act 1991 and the provisions of any byelaws made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 (byelaw making powers of the appropriate agency) to the Water Resources Act 1991. The Applicant has included draft protective provisions for the benefit of drainage authorities in lieu of those provisions.
Water Environment	We welcome the Project's commitment to maintain a minimum 9m buffer between any project works and IDB-maintained watercourses, as is required by Byelaw 10 (no works within 9 metres of flood risk / drainage infrastructure).	Yes	Maintenance buffers have been set to a minimum of 10m as requested by the Environment Agency for consistency purposes. This is secured through the **Design Principles Parameters and Commitments** document **[EN0110014/APP/7.18]**.
Water Environment	We request further details of the proposed project layout at Site 4A, which in its southwest corner is situated very close (c.15m) to a Board-maintained watercourse. We would seek to ensure the Board's maintenance vehicles are able to access this watercourse without passing through any PV array areas.	Yes	A minimum 10m buffer will be provided from any works, and the River Tas adjacent to Sub-Site 4A. It is envisaged that access to the watercourse for maintenance by the IDB would be from Brand's Lane to the south, however internal access is available through Sub-Site 4A. This is secured through the **Design Principles Parameters and Commitments document [EN0110014/APP/7.18]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	If any works are proposed within 9 metres of a Board maintained watercourse, this would require the Board's consent under Byelaw 10 and we would welcome discussion prior to detailed design.		
Water Environment	We also note the commitment to use trenchless crossings for any cable works beneath watercourse beds. This could be significant to the Board (in relation to minimising impacts on downstream watercourses) for cable works crossing watercourses upstream of the IDD, for example within Cable Route Corridos 6 and 7 crossing Hempnall Beck.	No	Trenchless crossings will be utilized for certain sensitive areas (identified as Avoidance Areas which include CRC6 and CRC7 for Hempnall Beck), however other areas there will be open trench crossings. Where open trench crossings are utilized for ordinary watercourses, the ground will be restored to existing level post installation so as not to impact on floodplain storage. The details of the cable route, including the start and end points of the different construction methods (being open cut trench and trenchless technologies) for the CRC will be confirmed at the detailed design stage, as secured through the **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]**.
Water Environment	The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 167 of the National Planning Policy Framework). For further information regarding the Board's involvement in the planning process please see our Planning and Byelaw Strategy, available online.	No	The Applicant notes this comment.

1.6 NATS Safeguarding

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
General	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	No	The Applicant welcomes this confirmation.
General	However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.	No	The Applicant has undertaken the required consultation in relation to the Scheme and would welcome any future consultation with NATS and/or NERL if those organisations deem it to be necessary.

1.7 National Gas

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Other Environmental Matters	NGT has 1 feeder main located within or in proximity to the Order limits. Details of this infrastructure is as follows: • Feeder Main – FM05 – Yelverton to Stowmarket • Cathodic Protection Ground beds/TR • Ancillary apparatus Please note that NGT has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.	No	Mapping showing utilities is provided in **ES Volume 2, Figure 18.1Utilities Plan [EN0110014/APP/6.1.18.1]**. **ES Volume 1, Chapter 18 - Other Environmental Matters [EN0110014/APP/6.1.18]** includes provisions for the mapped high pressure gas main which passes through sites 5A, 5B, 7B, 7E, 7F and CRC7. A suitable buffer has been provided between any infrastructure/works and the high-pressure gas main. This is detailed in **the Outline Construction Environmental Management Plan (OCEMP) [EN00110014/APP/7.1]**, which is secured via a Requirement of the **draft DCO [EN0110014/APP/3.1]**. The Applicant intends to continue close engagement and consultation with National Gas on any assets that may interact with the Scheme proposals.
Protected Provisions	Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGT apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGT requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. Adequate access to NGT pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.	No	This is noted by the Applicant.

1.8 Health and Safety Executive

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Reasonable Alternatives and Design Evolution	According to HSE's records, the proposed application boundary for this Nationally Significant Infrastructure Project is within the consultation zones of a major accident hazard site and a major accident hazard pipeline. This is based on the indicative site boundary in the drawing Indicative Masterplan June 2025 received by email 19 June 2025. The major accident hazard site ['MAHS'] is: Gas Power Services Ltd., Harveys Lane, Seething, HSE Site Ref. H3561. The major accident hazard pipeline ['MAHP'] is: National Gas's 5 Feeder Yelverton / Diss Comp Tee, HSE Ref. 7447, Transco Ref. 1706	Yes	The applicant has engaged with HSE to identify relevant HSE consultation zones for the Scheme. The Applicant has provided / applied an easement for identified utilities. Data has been incorporated into the design of the Scheme and appropriate buffers will be embedded into the design. The **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]** to be submitted with the ES, sets out measures used to reduce potential impact on identified utilities.
Reasonable Alternatives and Design Evolution	The Applicant should make contact with the above pipeline operators to verify and inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this: • The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline. • The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently,	No	The risk of major accidents and disasters is considered **within ES Volume 1, Chapter 18 - Other Environmental Matters [EN0110014/APP5/6.1.18]**. Considering the mitigation measures embedded into the Scheme, no significant major accident and disaster effects are considered likely to arise. The Applicant intends to continue robust consultation and engagement with all parties who have assets within the Scheme boundary areas, including pipeline operators. The Applicant has included Protective Provisions at Schedule 14 of the **draft DCO [E0110014/APP/3.1]** to ensure protection of existing statutory undertakers' assets or apparatus within the Order Limits.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	there may be a need for the operator to modify the pipeline or its operation, if the development proceeds. • To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.		
Reasonable Alternatives and Design Evolution	HSE's Land Use Planning advice [HSE: Land use planning - HSE's land use planning methodology] is dependent on the location of areas where people may be present within HSE's land-use planning zones. Based on the information in the PEIR June 2025 it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.	No	This is noted by the Applicant.
Other Environmental Matters	Based on the PEIR, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no relevant hazardous substances. Hazard classification is relevant to the potential for accidents. For example, hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is	Yes	The potential need to apply for Hazardous Substance Consent under The Planning (Hazardous Substances) Regulations 2015 is identified within Section 2 of the **Consents and Agreements Position Statement [EN0110014/APP/7.22]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	an 'addition rule' in Part 4 of Schedule 1 for below-threshold substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.		
Other Environmental Matters	As the major accident hazard site within the draft order limits, Mogden sewer treatment works, is also operated by the NSIP applicant, HSE advise the following for siting buildings if required. HSE would expect the risk to people at the development to be managed and mitigated through the application of the Health and Safety at Work Act and COMAH Regulations. This takes account of the need for the Operator of the major hazard installation to carry out an Occupied Buildings Risk Assessment, and for them to determine the most suitable location and design of proposed buildings, including the Local Equipment Room. HSE, acting in its regulatory role, may decide to engage with the operator to ensure they are fulfilling their duties, but the duty of risk management resides with the operator.	Yes	The Hempnall-Fritton Rd Sewage Treatment Works is no longer within the site boundary, it is to the northeast of Cable Route Corridor 7. The Applicant doesn't operate any sewer treatment works.
Other Environmental Matters	Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development. In Appendix 4.1 of the PEIR, Section A.3 provides some possible major accidents and disasters. Note, that there are no requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE.	No	This is noted by the Applicant

1.9 Kirstead Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
EIA Methodology	Colleagues in other parishes have examined the current submission documents and have highlighted the omissions and lack of information. Many environmental surveys have not been completed and many questions remain unanswered.	Yes	The PEIR does not constitute the final submission and/or environmental data. A full suite of surveys has been completed and an assessment of effects on each identified receptor/s is detailed in each relevant chapter of **the ES [EN0110014/APP/6.1]**.
Soils and Agriculture	Our parish objects to the scheme for many reasons. Firstly this scheme and others proposed for vast swathes of East Anglian farmland are unnecessary	No	The **Statement of Need [EN0110014 /APP/7.11]** sets out a full justification for the Scheme and explains that in its Clean Power 2030 Action Plan, the Government has set capacity ranges for large-scale solar in 2030 and 2035 to chart a path towards achieving its Clean Power Target. In June 2025 the Government published its UK Solar Roadmap, the Roadmap confirms that "Solar energy is one of the cheapest forms of electricity generation and will play a key role in reaching clean power. It will enable cheap, efficient electricity to drive other sectors of the economy" (p15). The Roadmap talks to the benefits of increasing small scale / rooftop solar generation in the UK to directly support reducing consumer bills, as well as the further deployment of ground mounted solar because "Ground-mounted solar is one of our cheapest electricity sources to build and operate at scale" and "Speed of deployment is also a huge benefit of solar" for both ground mounted and rooftop schemes (p15). These publications make it clear, and the Applicant agrees, that ground-mounted solar infrastructure is vital in ensuring the government's targets are met.
Needs Case	Furthermore it is unlikely that the grid in this part of East Anglia will be able to accommodate the additional intermittent power. On sunny days the solar farm would be "constrained off" and paid not to supply the grid.	No	In Section 7.2 of **the Statement of Need [EN0110014/APP/7.11]** the Applicant has provided a transmission network regional capacity assessment. This concludes that the network has sufficient capacity to transmit the energy the Scheme will generate to consumers nationally as well as into local distribution networks. This is a key benefit of the Scheme. The capacity of schemes in the planning pipeline in the region is at a level which will, if delivered, provide significant support to the government's Clean Power target. This underpins the

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			suitability of these transmission network regions for the development of large scale solar schemes. The inclusion of BESS as part of the Scheme means that it will be able to store low carbon energy when generation is in abundance and release it when demand for energy is higher.
Soils and Agriculture	Living in a rural farming area we strongly object to industrialising many acres of our best and most versatile land. 80% of the land required by East Pye falls into this BMV category.	No	Detailed Agricultural Land Classification surveys (ALC) have been undertaken to identify the grade of the land within the Sites and are reported **in ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15]**. As set out in Table 15-7, almost 80% of the land in Areas 1-10 is of BMV quality. The majority of the land will not be adversely affected, however, with fixed infrastructure and planting accounting for a small proportion of the land within the Order Limits, as described and quantified in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.1.15]**. Much of the area affected by infrastructure will be capable of full restoration after the decommissioning phase.
Soils and Agriculture	Given that climate change can randomly affect crop yields it seems that preserving our farmland is vital for food security in the future. Our farmland, under crops for many generations, stores carbon dioxide. Disturbing the soil to the depth required by the cable corridors would release this co2.	No	The land used for the Scheme makes up only a negligible proportion of the agricultural land in the UK used for food production. The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) in 2024. The agricultural land taken for the Scheme represents less than 0.01% of the UAA and is not expected to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. Furthermore, soil health is expected to improve over the Scheme's 60-year lifespan as the land transitions away from intensive arable farming.
Transport and Access	Much of the area around the site is served at best by narrow roads, in some cases only single vehicle width. There are weight restrictions on some which preclude their use by HGVs particularly those bringing the many tons of concrete required by the supports. We do not wish	No	Vehicle routeing has been designed to seek to avoid sensitive receptors where possible, and appropriate mitigation and management measures have been identified in the **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** and the **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	to see these tranquil lanes blocked and broken up by heavy traffic.		
Cultural Heritage	Part of the charm of this area are the lovely open views and the high number of grade 2 listed buildings. Hundreds of them of them are within 1 or 2 km of parts of the site (EPS own research) If the scheme goes ahead they would be impacted visually and possibly damaged by the vibration of the construction.	Yes	Embedded mitigation in the form of setbacks and landscape initiatives for screening has been incorporated into the Scheme where adverse impacts on views and settings have been identified. There is no evidence that listed buildings are more susceptible to vibration impacts than other buildings, and there are no significant effects of vibration from construction identified for any structures. A series of mitigation measures including visual screening and landscape integration have been detailed in the **Outline Landscape and Ecology Management Plan (OLEMP) [EN0110014/APP/7.4]**. Proposed measures will be further outlined in a detailed version of the LEMP which will be secured via a Requirement of the **draft DCO [EN0110014/APP/3.1]**.
Landscape and Visual	EPS suggests tree planting and new hedgerows (suggesting that existing hedgerows will be grubbed out to facilitate construction) but it takes 20 to 30 years for a substantial hedge to develop. Our councils own planning guidelines suggest that it will be impossible to accommodate the proposed development without unacceptable adverse effects. This scheme would adversely affect the lives of residents, deter tourists and damage wildlife.	No	The Applicant respectfully disagrees with the suggestion that it will be impossible to accommodate the Scheme without adverse effects, including to tourism, ecology, and residents. The Applicant has undertaken an iterative design process which has taken into account the views of the local community through three stages of consultation, alongside rigorous environmental impact assessments. The results of both of these activities have been used to develop and refine the design as to minimise impacts across all Scheme aspects. Not all impacts have been determined to be adverse, such as that to tourism, anticipated to be low in impact, as further explained in **ES Volume 1, Chapter 14 – Socio-Economics [EN0110014/APP/6.1.14]**. Similarly, impacts, such as visual, have been, in some cases, deemed significant and adverse, however these change as planted mitigation and enhancement measures mature. A number of more significant impacts, especially regarding traffic, are primarily associated with the construction phase, and would not persist into the operational phase.

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			The **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]** and **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]** have been prepared to secure mitigation measures to minimise impacts arising from the construction phase. The Applicant agrees that hedgerows would take a long time to establish. The **Outline Landscape Environmental Management Plan (OLEMP) [EN0110014/APP/7.4]** includes measures regarding proposed new hedgerows and enhancement of existing hedgerows, to ensure a balance between current and future mitigation. Existing hedgerows would only be removed if required as part of the construction. As far as practicable the Applicant will avoid the removal of vegetation.
Reasonable Alternatives and Design Evolution	We are not anti-solar and strongly support the CPRE rooftop first approach as well as already industrialised sites probably nearer to where the demand for power is greater. We hope greater consideration will be shown to the local residents and this scheme be dropped.	No	The **Statement of Need [EN0110014/APP/7.11]** explains why these alternatives are not feasible. It is set out in full in Section 6.3 but summarised below. Many sites, including brownfield sites and rooftops, may simply not be suitable. They may be in areas of low solar irradiance, have unfavourable topography or be too small to develop effectively. Many brownfield sites, including those in more built-up areas, may be needed for other uses and may therefore already allocated in local plans for housing or commercial development. Others may have remediation issues which render sites unavailable for solar development given potential costs or liabilities associated with cleaning up after prior activities. Others may be located far away from existing grid infrastructure or refused planning consent. In relation to roof space, larger commercial structures or buildings with shared roof space may have contractual issues relating to ownership, occupation, and upkeep which must be resolved prior to any solar development or may not be resolvable in a timely and efficient way. Any roof space sloping to the north will be unsuitable for solar panels. Smaller buildings listed buildings or those with period features are also likely to be less suitable for rooftop solar panels.

1.10 Hedenham Parish Meeting

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
General	This formal objection is submitted in response to the statutory consultation on the East Pye Solar Project. It is submitted on the basis that the Preliminary Environmental Information Report (PEIR) fails to meet the standards required under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the Planning Act 2008, and the relevant National Policy Statements EN-1 and EN-3.	No	This is noted by the Applicant.
Consultation and Engagement	It [the PEIR] fails to respond adequately to the Planning Inspectorate's Scoping Opinion or to provide statutory consultees and the local community with sufficient information to enable informed consultation, as required under section 47 of the Act.	No	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the PA2008, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant's Phase Two consultation (which was statutory under section 47 of the PA2008) was carried out in line with the commitments and principles established in the Applicant's published Statement of Community Consultation (SoCC). As required by s47 of the PA2008, the Applicant consulted with South Norfolk Council and Norfolk County Council on a draft of the SoCC and had due regard to their comments in updating the SoCC for publication ahead of commencing statutory consultation. Chapter 6 (Preparation for Statutory Section 47 Consultation) of **the Consultation Report [EN0110014/APP.5.1]** describes the process of preparing the SoCC, including the Applicant's consideration of comments received by South Norfolk Council and Norfolk County Council (Table 6-1, Table 6-2 and Table 6-3) and adherence to commitments made in the published SoCC (Table 6-5). The Preliminary Environmental Information Report (PEIR) set out the initial findings of the EIA. PINS' Nationally Significant Infrastructure Projects – Advice Note Seven: Environmental Impact Assessment: Process, preliminary

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			environmental information and environmental statements (Advice Note Seven) advises that preliminary environmental information is not expected to replicate or be a draft of the Environmental Statement and acknowledges the level of detail and type of information may vary. The PEIR provided at the statutory consultation presented 'preliminary' information, upon which the Applicant has sought consultee's comments. In accordance with Advice Note Seven, the PEIR clearly states that the information is 'preliminary'. The EIA is an ongoing process. The ES has had regard to comments received through the statutory consultation and targeted consultation, to inform the design of the Scheme, where possible. The findings of the EIA are presented in the ES chapters, and a summary of the main design changes to the Scheme can be found in **ES Volume 1, Chapter 4 - Alternatives and Design Evolution [EN0110014/APP.6.1.4]**. The ES was undertaken in accordance with the EIA Regulations and was based upon the Scoping Opinion. The Applicant has complied with both the EIA Regulations and Advice Note Seven by providing preliminary environmental information which outlines the likely significant effects of the Scheme. The Applicant's **Section 55 Checklist [EN0110014/APP/1.4]** also demonstrates compliance in general.
Other Environmental Matters	The high-pressure gas main, which crossed several of the proposed sites, has been omitted entirely from the assessment. This undermines compliance with EN-1 4.11 and EIA Regs Schedule 4(8).	Yes	Mapping showing utilities is provided in **ES Volume 2, Figure 18.1 -Utilities Plan [EN0110014/APP/6.1.18.1]**. **ES Volume 1, Chapter 18 - Other Environmental Matters** includes provisions for the mapped high pressure gas main which passes through sites 5A, 5B, 7B, 7E, 7F and CRC7. The Applicant has provided / applied an easement for identified utilities, which are at risk of causing a major accident or disaster. The easement has been provided to reduce interaction between the Scheme and identified utilities, mitigating the risk of Major Accident and Disasters. Further consultation was undertaken with National Gas Transmission (NGT) regarding the proposals for the Cable Route Corridor (CRC). It was concluded

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			that track and cable crossings should cross the identified pipelines perpendicular to their route of travel, which has consequently been incorporated into the design of the CRCs. Further engagement is being sought with NGT regarding protective provisions for the identified assets and will be incorporated into the detailed Construction Environmental Management Plan (CEMP), which will be secured via a Requirement in the DCO. An **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]** has been provided as part of the DCO Submission. The **draft DCO [EN0110014/APP/3.1]** also includes protective provisions at Schedule 14 for the protection of, amongst others, gas undertakers, to ensure protection of gas assets and apparatus.
Needs Case	We wish to preface our formal objection to the PEIR by explaining that we object fundamentally to the East Pye Solar NSIP because there are already adequate solar energy and BESS projects either built, under construction or in planning to meet DESNZ's CP2030 or CP2035 targets for East Anglia (OFGEM TM04+ Impact Assessment, April 2025; NESO Connections Reform Data Impact Assessment, December 2024). As such, the East Pye Solar project is not essential to fulfil national renewable energy objectives. Indeed, it would unnecessarily take up capacity on the transmission grid which will be required for other types of generation needed in our area.	No	The **Statement of Need [EN0110014/APP/7/11]** explains how the Scheme contributes towards the 2030 Clean Power Action Plan. The Clean Power target is an outcome-focused target, defined in the Clean Power 2030 Action Plan. The Clean Power 2030 Action Plan recognises that there are multiple different possible pathways to achieving the Clean Power target, and that future pathways will be informed as progress is made. The Capacity Ranges set out in the Clean Power 2030 Action Plan are “a foundation to guide rapid policy development and focus delivery” but “the scenarios developed now cannot be exhaustive or definitive, and it is only right that some optionality is retained”. Therefore, flexibility in government’s plan allows that “potential challenges in some areas of clean power delivery can be compensated by deployment elsewhere”. The Government is therefore not targeting specific capacities of specific technologies by specific future years. Rather, the Government recognises that latitude is required to facilitate the development of sufficient future generation capacity to meet its Clean Power target.
Needs case	The extreme and wide-ranging harms posed by this scheme - to the landscape, community, wildlife, farmland, and nationally significant heritage - are not justified by any demonstratable	No	The Applicant notes this, however there is justifiable need for this Scheme. The **Statement of Need [EN0110014/APP/7/11]** explains the need for the Scheme.

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	critical need of it. This proposal represents an unjustifiable assault on rural Norfolk that fails to balance national policy with local environmental protection.		The Clean Power target is an outcome-focused target, defined in the Clean Power 2030 Action Plan. The Clean Power 2030 Action Plan recognises that there are multiple different possible pathways to achieving the Clean Power target, and that future pathways will be informed as progress is made. The Capacity Ranges set out in the Clean Power 2030 Action Plan are "a foundation to guide rapid policy development and focus delivery" but "the scenarios developed now cannot be exhaustive or definitive, and it is only right that some optionality is retained". Therefore, flexibility in government's plan allows that "potential challenges in some areas of clean power delivery can be compensated by deployment elsewhere". Local environmental protection has been considered in a proportional manner by the Applicant. this is shown in Further details on the potential impacts of the scheme, including contributions to Biodiversity Net Gain (BNG), are set out in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]**, and supported by the **Biodiversity Net Gain Report [EN0110014/APP/7.23]**.
General	This submission constitutes a formal objection to the East Pye Solar Nationally Significant Infrastructure Project (NSIP) at the statutory consultation stage. Based on a comprehensive review of the Preliminary Environmental Information Report (PEIR) and its associated volumes, we conclude that the PEIR is legally and procedurally deficient and does not enable meaningful consultation as required by the Planning Act 2008 and the Environmental Impact Assessment Regulations 2017.	No	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the PA2008, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant's Phase Two consultation (which was statutory under section 47 of the PA2008) was carried out in line with the commitments and principles established in the Applicant's published Statement of Community Consultation (SoCC). As required by s47 of the PA2008, the Applicant consulted with South Norfolk Council and Norfolk County Council on a draft of the SoCC and had due regard to their comments in updating the SoCC for publication ahead of commencing statutory consultation. Chapter 6 (Preparation for Statutory Section 47 Consultation) of the **Consultation Report [EN0110014/APP.5.1]** describes the process of preparing the SoCC, including the Applicant's consideration of comments received by South Norfolk Council

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			and Norfolk County Council (Table 6-1, Table 6-2 and Table 6-3) and adherence to commitments made in the published SoCC (Table 6-5). The EIA is an ongoing process. The ES has had regard to comments received through the statutory consultation and targeted consultation, to inform the design of the Scheme, where possible. The findings of the EIA are presented in the ES chapters, and a summary of the main design changes to the Scheme can be found **in ES Volume 1, Chapter 4 - Alternatives and Design Evolution [EN0110014/APP.6.1.4]**. The ES was undertaken in accordance with the EIA Regulations and was based upon the Scoping Opinion.
Ecology and Biodiversity	Key surveys (e.g. great crested newts, turtles, doves, lapwing, bats) are incomplete, with critical data deferred or missing. Surveys have not adhered to Natural England Guidelines or been undertaken at the advised times of year (GCN).	Yes	Species specific surveys have now been completed and provided within **ES Volume 3, Appendix 8.1 – 8.9 [EN0110014/APP/6.3.8.1 – 8.9]** which detail survey results and methodology.
Cumulative Impacts	There is no lawful cumulative impact assessment in breach of NPS EN-1 4.2.5 and EIA Regs Schedule 4(5) (PINS Scoping Opinion 3.19.4, 3.21.2, 3.21.3). The PEIR fails to consider adjacent or overlapping NSIPs such as Tasway Energy Park, Ecopower Yaxley, The Droves or High Grove Solar.	Yes	The assessment of cumulative scheme is set out within the technical chapters of the (**ES Volume 1, Chapters 6-18 [EN0110014/APP/6.1.6 - 6.1.8]**), with the full list of cumulative schemes assessed provided in **ES Volume 3, Appendix 2.4 - Cumulative Schemes [EN0110014/APP/6.3.2.4]**. This includes the other relevant NSIP projects.
Water Environment	The PEIR does not assess impacts chalk streams, private drinking water supplies or Source Protection Zones.	Yes	**ES Volume 3, Appendix 9.2 - Water Framework Directive Assessment [EN0110014/APP/6.3.9.2]** has been provided as part of the DCO application. This details assessments on chalk streams and drinking water safeguard zones.
Water Environment	No strategy for construction or operational water access has been presented, despite Anglia Water refusing supply (PINS SO 3.2.2).	Yes	Details of water supply plans for the duration of the construction and operational phases are highlighted in **Outline Operational Environmental Management Plan (OOEMP) [EN0110014/APP/7.2]** and Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1].
Water Environment	No Flood Risk Assessment analysis has been provided (PINS SO 3.2.3)	Yes	**ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** has been provided as part of the DCO application.

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Electromagnetic Fields	EMF impacts on River Tas fish and local bat roosts have not been assessed (PINS SO 3.4.1 and 3.15.17).	Yes	NPS EN-5 states 'There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.' Electric fields from underground cables are contained within the cable's protective insulation and sheath, so there are no external electric fields. The magnetic field strength of underground cables, understood to be buried 5m underground, is of a negligible magnitude as suggested by the data in **ES Volume 3, Appendix 17.1 - High-Level Electromagnetic Fields Assessment [EN0110014/APP/6.3.17.1]**. Therefore, no significant impact upon River Tas fish is predicted. The source of data considered for the electromagnetic impacts upon human health states 'Bats use echolocation to detect prey and to aid navigation. This operates in the frequency range of 20 kHz to 200 kHz. Power lines do not produce significant fields at these frequencies and are therefore highly unlikely to interfere with the bats' navigation or foraging. Nor are there any reports of this happening with existing power lines'.
BESS	The assessment of major accidents and disasters, especially the risk of BESS fires, is based on flawed or outdated statistics. There is no modelling of toxic plume, water contamination, or health impacts (PINS SO 3.11.1). No probabilistic risk modelling or thermal runaway containment strategy is provided, despite the proximity of sensitive receptors including private water supplies and homes. This undermines compliance with EN-1 4.11, EIA Regs Schedule 4(8) and BS EN 62446-1.	Yes	The Applicant has submitted an **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]** which outlines the key fire safety provisions for the Battery Energy Storage System (BESS) proposed to be installed as part of the Scheme, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. The **OBSMP [EN0110014/APP/7.5]** confirms that a robust and validated Emergency Response Plan (ERP) will be developed at the detailed design stage in consultation with Norfolk Fire and Rescue Service (NFRS). Section 4.4 of the OBSMP covers all key aspects of Emergency Planning for the BESS site. The Applicant has also commissioned a Plume Study (BESS Fire Emissions Modelling report [EN00110014/APP/7.5]) assesses the battery fire emissions to air impacts at six worst case BESS fire locations (using the indicative BESS design) on sensitive receptors within a 1 km radius of the BESS Compound. Through the implementation of the **OBSMP [EN0110014/APP/7.5]**

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			and ERP, it is considered that the potential risk of air quality impacts resulting from a BESS fire will be effectively controlled.
Cultural Heritage	The PEIR fails to protect nationally important listed buildings and heritage assets, especially timber-framed buildings without foundations, and neither respects nor preserves the South Norfolk Claylands landscape.	Yes	Potential impacts on designated and non-designated assets along with the historic landscape have been assessed within **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014 /APP/6.1.10]** and it is considered that, following embedded mitigation, there will be no significant effects on any heritage asset of historic landscape. Although there are timber-framed buildings identified as potentially sensitive to the Scheme, these types of buildings in this region typically have foundations of flint, clay and lime mortar and there have been no timber-framed buildings without foundations identified as part of the assessment. There is no evidence that timber-framing is more susceptible to structural issues from construction nearby and indeed, both the Historic England and the Society for the Protection of Ancient Buildings note that timber-framed constructions are remarkably durable. Their main risk comes from flooding and water ingress, which is not considered as a potential risk to heritage assets within the study area. Where potential cultural heritage sensitivities have been identified, particularly indirect impacts to their settings, mitigation including setbacks and landscaping initiatives have been embedded into the design to minimise/avoid any effects
Glint and Glare	Night-time lighting impacts on dark-landscapes are omitted (PINS SO 3.14.6).	No	The Order Limits are not located within an International Dark Sky Nature reserve, but at the regional level the Order Limits are within a Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy. This is detailed in **Design Approach Document [EN0110014/APP/7.17]**. CPRE England's Light Pollution and Dark Skies Plan has also been considered in **ES Volume 2, Figure 7.4 [EN0110014/APP/6.2.7.4]**.
Landscape and Visual	The Visual Impact Assessment does not use photography from summer or address private views or tranquil areas (PINS SO 3.4.2).	No	Summer survey has now been carried out. Summer photography is presented in **ES Volume 3, Appendix 7.5.1–7.5.12 Photosheets [EN0110014/APP/6.3.7.5]**. Private views are not considered as part of LVIA, as LVIA is an assessment of public amenity.

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			Tranquillity is considered as part **of ES Volume 3, Appendix 7.2 - Landscape Baseline [EN0110014/APP/6.3.7.4]**, with support from **ES Volume 2, Figure 7.8 - Tranquillity [EN0110014/APP/6.2.7.8]**.
Cultural Heritage	Heritage settings are not assessed in tandem with visual effects, or cumulative landscape changes (PINS SO 3.5.3).	No	Heritage settings have been assessed within **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014 /APP/6.1.10]** and **ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3.10.1]**, including impacts to views and cumulative landscape changes.
Cultural Heritage	Impacts to settings of Grade II Listed Buildings are still only assessed within 100m despite 2KM visibility of the panels (PINS SO 3.16.6).	No	The Scoping Report stated a 2km study area for Grade II Listed Buildings (with a flexible approach to any identified listed buildings that may be sensitive outside of these areas). This study area has also been adopted for the ES, as outlined in **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014 /APP/6.1.10]** and **ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3.10.1]**.
Public Rights of Way and Recreation	There is no lawful assessment of impacts on public rights of way, or the consequences of compulsorily widening rural lanes. Norfolk County Council's PRoW Policy and Guidance and Access Improvement Plan, BS5709:2018 or the Street Works Code are not referenced.	No	It is anticipated that the PRoW mentioned in Table 4.1 of **Outline Public Rights of Way and Permissive Paths Management Plan [EN0110014/APP/7.8]** together with sections of the Boudicca Way and Via Beata within the order Limits will remain open to users wherever possible throughout the construction period, temporary measures management measures will be utilised. This is secured within the management plan, a detailed version of which will be submitted to the relevant planning authority for approval. Effects on all assessed PRoWs are considered in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** with the latter also considering the widening of rural lanes.
Socio-Economics	Inclusive design must be addressed at the PEIR stage under the Equality Act 2010, yet it is entirely absent, as is any reference to NCC's Highways Development Management Guidance Note 2, Drainage Design Standard, Manual for Streets or Design Manual for Roads and Bridges.	Yes	An **Equality Impact Assessment [EN0110014/APP/7.19] and Design Approach Document [EN0110014/APP/7.17]** have been produced and submitted with the application which considers these matters.

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Noise and Vibration	There is no vibration modelling or impact assessment on historic structures, rural infrastructure, or adjacent properties, despite proposed use of HGVs on single-track lanes.	Yes	The impact of vibration generated by construction traffic movements is considered and assessed **within ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]**.
Noise and Vibration	There is no specific assessment of BESS notice, nor any receptor-level analysis (PINS SO 3.18.3).	Yes	The potential impact of noise generated by the BESS is considered and assessed within **ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]**. Noise requirements for the BESS are outlined within **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**. Noise emissions from the Scheme will be controlled via measures set out within the **Outline Operational Environmental Management Plan [EN0110014/APP/7.2]**.
Reasonable Alternatives and Design Evolution	Key infrastructure is sited near high-pressure gas mains, private water supplies and close to the London to Norwich mainline railway, none of which are properly assessed in the PEIR.	No	As detailed within the **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]**, mitigation measures have been incorporated into the construction phase to identify and manage Impacts on utilities, telecommunications, and television receptors. These measures include but are not limited to: • Above and below-ground infrastructure as part of the Scheme located with adequate offsets/buffers from existing telecommunications and utility infrastructure, where practicable; and • Use of geophysical data alongside mapping provided by telecommunication and utilities providers to ensure underground and overground utilities are adequately offset; Measures in relation to safe working near buried utilities, particularly gas pipelines, will be in place at all phases of the Scheme.
Other Environmental Matters	UXO Desk Study identified moderate-high risk, but PEIR gives no survey timetable (PINS SO 3.3.2)	No	The UXO constraints assessment, provided as an annex **to ES Volume 1, Appendix 16.1 - Phase 1 Ground Conditions Assessment [EN0110014/APP/6.3.16.1]** identifies areas of Moderate to High UXO hazard constraint.

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			A detailed UXO desk study will be procured post-consent prior to construction to confirm the UXO constraint level. Where a potential UXO hazard is identified by the detailed UXO desk study, the detailed study will include further recommended mitigation measures (e.g., non-intrusive surveys to further delineate potential UXO hazards, and investigation and removal of targets identified by the non-intrusive survey) for the intended types of development and anticipated working practices and could also include non-intrusive surveys.
Air Quality	There is no air quality modelling for construction traffic or cumulative effects (PINS SO 3.1.3), and vulnerable receptors are ignored, contrary to EN-1 5.11 and IAQM guidance.	Yes	The assessment presented in **ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13]** has been undertaken in accordance with best practice guidance including Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) 'Guidance on land-use planning and development control: planning for air quality' v1.2 (2017). **ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13]** includes an assessment of construction traffic and cumulative air quality effects on sensitive receptors. The potential for air quality impacts from construction road traffic emissions has initially been screened against relevant guidance thresholds (which take into account changes in traffic flows resulting from a development) to determine if dispersion modelling is required. If the screening criteria set out in relevant guidance are not exceeded, then dispersion modelling of air quality impacts is not required as the impacts are deemed to be 'not significant'.
Soils and Agriculture	Long-term harm to soils and agricultural productivity is not property assessed (PINS SO 3.20.3). No mitigation nor restoration plan is in place for best and most versatile land.	No	Impacts on soil quality and agricultural matters as well as soil restoration and management have been assessed in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15]** and **Outline Soil Resource and Management Plan (OSRMP) [EN0110014/APP/7.9]**.
Consultation and Engagement	The statutory consultation is flawed. The Non-Technical Summary is misleading, and the consultation does not comply with S47 of the Planning Act or Regulation 12 of the EIA regulations.	No	The Applicant considers that the statutory consultation and associated documents has been robust, thorough and undertaken in accordance with the requirements of the PA2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			The Applicant's Phase Two consultation (which was statutory under section 47 of the PA2008) was carried out in line with the commitments and principles established in the Applicant's published Statement of Community Consultation (SoCC). As required by s47 of the PA2008, the Applicant consulted with South Norfolk Council and Norfolk County Council on a draft of the SoCC and had due regard to their comments in updating the SoCC for publication ahead of commencing statutory consultation. Chapter 6 (Preparation for Statutory Section 47 Consultation) of the **Consultation Report [EN0110014/APP.5.1]** describes the process of preparing the SoCC, including the Applicant's consideration of comments received by South Norfolk Council and Norfolk County Council (Table 6-1, Table 6-2 and Table 6-3) and adherence to commitments made in the published SoCC (Table 6-5). The Preliminary Environmental Information Report (PEIR) set out the initial findings of the EIA. PINS' Nationally Significant Infrastructure Projects – Advice Note Seven: Environmental Impact Assessment: Process, preliminary environmental information and environmental statements (Advice Note Seven) advises that preliminary environmental information is not expected to replicate or be a draft of the Environmental Statement and acknowledges the level of detail and type of information may vary. The PEIR provided at the statutory consultation presented 'preliminary' information, upon which the Applicant has sought consultee's comments. In accordance with Advice Note Seven, the PEIR clearly states that the information is 'preliminary'. The EIA is an ongoing process. The ES has had regard to comments received through the statutory consultation and targeted consultation, to inform the design of the Scheme, where possible. The findings of the EIA are presented in the ES chapters, and a summary of the main design changes to the Scheme can be found in **ES Volume 1, Chapter 4 - Alternatives and Design Evolution [EN0110014/APP.6.1.4]**. The ES was undertaken in accordance with the EIA Regulations and was based upon the Scoping Opinion.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			The Applicant has complied with both the EIA Regulations and Advice Note Seven by providing preliminary environmental information which outlines the likely significant effects of the Scheme.
BESS	No probabilistic risk modelling or thermal runaway containment strategy is provided, despite the proximity to sensitive receptors including private water supplies and homes.	Yes	Risk assessments in relation to the BESS has been presented by the Applicant in the **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]**. The same management plan details the potential effects of Thermal Runaway and appropriate embedded safety requirements for BESS design to prevent this. A detailed version of a BESS Site plan will be provided to Norfolk Fire and Rescue Service that will include containment system information amongst other safety measures. Appendix A to the **OBSMP [EN0110014/APP/7.5]** has been conducted using the indicative BESS design to assess the potential air quality impacts of a BESS thermal runaway incident to sensitive receptors within a 1km radius of the BESS area. Through the implementation of the **OBSMP [EN0110014/APP/7.5]** and ERP, it is considered that the potential risk of air quality impacts resulting from a BESS fire will be effectively controlled.
Other Environmental Matters	Omitting the presence of the high-pressure gas main from assessment in the PEIR is a particularly grave failure. This undermines compliance with EN-1 4.11 and EIA Regs Schedule 4(8).	No	The high-pressure gas pipeline and other relevant utilities are presented on **ES Volume 2, Figure 18.1 Utilities Plan [EN0110014/APP/6.2.18.1].** The Applicant has provided / applied an easement for identified utilities, which are at risk of causing a major accident or disaster. The easement has been provided to reduce interaction between the scheme and identified utilities, mitigating the risk. The **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]**, mitigation measures have been incorporated into the construction phase to identify and manage Impacts on utilities, telecommunications, and television receptors. These measures include but are not limited to:

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			• Above and below-ground infrastructure as part of the Scheme located with adequate offsets/buffers from existing telecommunications and utility infrastructure, where practicable; and • Use of geophysical data alongside mapping provided by telecommunication and utilities providers to ensure underground and overground utilities are adequately offset; • Measures in relation to safe working near buried utilities, particularly gas pipelines, will be in place at all phases of the Scheme The **draft DCO [EN0110014/APP/3.1]** also includes protective provisions at Schedule 14 for the protection of, amongst others, gas undertakers, to ensure protection of gas assets and apparatus.
Consultation and Engagement	We therefore respectfully request that: • A revised and legally compliant PEIR be issued, including complete data and proper assessments; We therefore respectfully request that: • A fresh consultation period be initiated in accordance with statutory requirements and best practice.	No	The statutory consultation has been undertaken in accordance with the requirements of the PA2008, the EIA regulations and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant's **Section 55 Checklist [EN0110014/APP/1.4]** confirms the consideration and compliance of the Scheme overall. On this basis, a second statutory consultation will not be undertaken.
Compulsory Purchase / Acquisition	We would also like to bring to the Planning Inspectorate's attention that many residents across multiple parishes, including elderly and vulnerable parishioners, have been receiving letters from East Pye Solar's land agent, Dalcour Maclaren, informing them that their property 'may be required' for this project. The letter provides no indication of exactly why their property may be needed or whether this is on a temporary or permanent basis. This is causing enormous distress and anxiety to residents and	No	The Applicant confirms that there is no intention to compulsory purchase any homes for the Scheme. Part of the purpose of the land referencing activities undertaken is to enable the Applicant to understand land interests so that impact to homes and gardens can be avoided. The Applicant is consequently sorry for any distress caused to residents who may have been contacted multiple times for the purposes of land referencing, this is a statutory process that the Applicant was intending to fulfil to the best of their duty.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	has been reported extensively in national and local press ('Domesday villagers face being forced to sell homes make way for UK's biggest solar farm' Daily Express, Mon, Jun 9, 2025; 'Britain's biggest solar farm threatens Domesday villages', Telegraph, Mon, Jun 9, 2025). Despite this, neither East Pye nor Dalcour Maclaren have provided any reassurance to individual residents. The residents have been contacted multiple times by post and by telephone. The situation has become so distressing that Hempnall Parish Council has passed a motion to report the issue to the Police as causing Harassment, Anxiety and Distress. We hope that you agree that the project should be from the start to avoid these kinds of impacts on private residential properties. This is an entirely inappropriate way to treat the local community and their private property rights, which are protected under Article 1 of Protocol 1 of the Human Rights Act 1998, standards set out in Section 122 of the Planning Act 2008, Section 47 of the Planning Act and EIA Regulation 12(3)(b).		The communications relations team made an effort to liaise with the lands referencing team in cases where individual concerns were raised through the Scheme communications channels.

1.11 Hempnall Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Needs Case	There is a far better way of addressing the requirement to reach net zero by 2050. The Climate Change Committee assesses that 85GW is the contribution needed from solar energy to meet the 2050 target. This can all be provided from roofs and artificial surfaces and a report produced by the UCL Energy Institute for CPRE demonstrates that 117GW could be made available from these sources by 2050. Solar on land is not needed.	No	The **Statement of Need [EN0110014/APP/7.11]** explains why these alternatives are not feasible. It is set out in full in Section 6.3 but summarised below. Many sites, including brownfield sites and rooftops, may simply not be suitable. They may be in areas of low solar irradiance, have unfavourable topography or be too small to develop effectively. Many brownfield sites, including those in more built-up areas, may be needed for other uses and may therefore already allocated in local plans for housing or commercial development. Others may have remediation issues which render sites unavailable for solar development given potential costs or liabilities associated with cleaning up after prior activities. Others may be located far away from existing grid infrastructure or refused planning consent. In relation to roof space, larger commercial structures or buildings with shared roof space may have contractual issues relating to ownership, occupation, and upkeep which must be resolved prior to any solar development or may not be resolvable in a timely and efficient way. Any roof space sloping to the north will be unsuitable for solar panels. Smaller buildings listed buildings or those with period features are also likely to be less suitable for rooftop solar panels.
Needs Case	In spite of claims made by Island Green, the scheme is not relevant to the implementation of the 2030 Clean Power Act because the grid connection will not take place until at least 2031.	No	The **Statement of Need [EN0110014/APP/7/11]** explains how the Scheme contributes towards the 2030 Clean Power Action Plan. The Clean Power target is an outcome-focussed target, defined in the Clean Power 2030 Action Plan. The Clean Power 2030 Action Plan recognises that there are multiple different possible pathways to achieving the Clean Power target, and that future pathways will be informed as progress is made. The Capacity Ranges set out in the Clean Power 2030 Action Plan are “a foundation to guide rapid policy development and focus delivery” but “the scenarios developed now cannot be exhaustive or definitive, and it is only right that some optionality is retained”. Therefore, flexibility in government’s plan allows that “potential challenges in some areas of clean power delivery can be compensated by deployment elsewhere”

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			The Government is therefore not targeting specific capacities of specific technologies by specific future years. Rather, the Government recognises that latitude is required to facilitate the development of sufficient future generation capacity to meet its Clean Power target.
Landscape and Visual	The Scheme would industrialise large sections of countryside in South Norfolk, including numerous fields and meadows in and around Hempnall. The presence of solar panels up to 4.5m in height, security fences, security cameras, security lights, inverter buildings, substations and access tracks covering almost 100 large fields and meadows is absolutely unacceptable to Hempnall Parish Council and its parishioners. The mitigation on offer to reduce these impacts is inadequate and frankly meaningless, in particular, really pleasant walks along green lanes such as Pymers Lane and Nobbs Loke in Hempnall will be ruined. Nobbs Lane passes through one of the most tranquil areas in lowland England as identified on the CPRE tranquillity maps. Tranquillity is defined not only as an absence of noise, but also as an absence of manmade structures in the landscape. Introducing a power station into such locations is an outrageous idea.	No	Pymer's Lane and Nobb's Lane are located outside the Order Limits, along the Site boundary, with both recognised as having medium sensitivity for the purposes of the Landscape and Visual Impact Assessment (LVIA); further detail regarding the results of the LVIA and the potential visual effects on these lanes are considered in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and **ES Volume 3, Appendix 7.4 - Visual Baseline [EN0110014/APP/6.3.7.4].** For Nobb's Lane, it is acknowledged that during construction the Lane would experience moderate significant visual impact, however this reduces negligible (not significant) at both years 1 and 15 of operation. The Applicant has embedded a number of visual mitigation measures, including retention of existing trees throughout the Order Limits, wherever possible and as identified in **ES Volume 3, Appendix 7.10 -Preliminary Arboriculture Impact Assessment (Preliminary AIA) [EN0110014APP/6.3.7.10]**, and the use of visual screening, such as hoardings, would be implemented for more sensitive visual receptors in proximity to the Order Limits, including residential and PRoW receptors that have the greatest potential to be affected by the Scheme. These measures are further outlined in and secured through the **Outline Construction and Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]** and shown on the **Works Plan [EN0110014/APP/2.3].** For Pymar's Lane, it is anticipated that during construction the lane would experience minor adverse (not significant) visual impact, reducing to negligible adverse (not significant) throughout operation. Visibility of construction activity would be limited by intervening vegetation and built form along the course of the PRoW. Glimpses towards activity, generally of large moving vehicles, would be possible as users emerge from the farm across agricultural fields, however for the most part the linear woodland would either screen or filter clear views. Mitigation proposed would entail retention of existing vegetation along field boundaries and retention of existing linear and block woodland. Further

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			detail regarding impacts to and visual mitigation for Pymar's Lane is included within **ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [EN0110014/APP/6.3.7.9]**, with mitigation secured through the **OCEMP [EN0110014/APP/7.1]**. The tranquillity of the surrounding landscape is addressed within the landscape baseline in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]**, **ES Volume 3, Appendix 7.2 - Landscape Baseline [EN00110014/APP/6.3.7.2]** and summarised in **ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [EN0110014/APP/6.3.7.3]**.
PRoW and Recreation	The total length of pubic rights of way (PROW) directly affected by the proposal is just under 30km (these PROWs will have solar infrastructure either on both sides or along one side) but many other PROWs in the area (including sections of Boudica's Way) will have disturbing views towards solar infrastructure. The landscape will suffer long term disastrous alteration.	Yes	This is noted by the Applicant. The DCO Application includes the **Outline Public Rights of Way and Permissive Paths Management Plan [EN0110014/APP/7.8]**, which details how access to open spaces will be maintained and enhanced throughout the delivery of the Scheme. In addition, effects on PRoW are considered, and proposed mitigation outlined, in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11**]. While mitigation measures would vary by PRoW, mitigation in relation to the potentially affected sections of the Boudicca Way include the retention of existing vegetation where practicable; planting of native hedgerow along the southern boundary of Sub-Site 7A; planting of hedgerow with hedgerow trees and native broadleaf woodland to the northern boundaries of Sub-Site 7F; and infill planting to the western boundary of Sub-Site 8B. Impacts to the Boudicca Way and mitigation measures are further explained in **ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [EN0110014/APP/6.3.7.9**], with mitigation secured through the **OCEMP [EN0110014/APP/7.1]** and **OLEMP [EN0110014/APP/7.4].** In addition, all PRoWs that pass by solar infrastructure would include appropriate buffers and offsets, such as an offset of up to 50m for PRoW Great Moulton; The **Design Approach**

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			Document [EN0110014APP/7.17] further defines the minimum offsets and buffers from existing features within Table 3.2.
Cultural Heritage	The proposed mitigation is inconsistent, ill thought out and grossly inadequate. For example, site 6 is being suggested as one of the mitigation sites where solar panels would not be placed because of impacts on listed buildings. This site is adjacent to 2 mega poultry farms. Other sites such as 7F close to the conservation area of Saxlingham Green and the numerous listed buildings in that area remain part of the proposals! The whole scheme area contains hundreds of listed buildings and numerous conservation areas. If a site alongside a poultry farm is to be removed because of listed building impact, then all sites should be taken out of the scheme.	Yes	Embedded mitigation in the form of setbacks and landscape initiatives for screening have been incorporated into the Scheme where potential setting issues have been identified, providing a consistent response to mitigation of likely effects on Cultural Heritage. Mitigation of heritage impacts is included within **ES Volume 1, Chapter 10 Cultural Heritage [EN0110014/APP/6.1.10]** and **ES Volume 3, Appendix 10.6 Outline Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6].** Measures are secured through relevant management plans including the **OCEMP [EN0110014/APP/7.1]**, **OLEMP [EN0110014/APP/7.4]**, and **OCTMP [EN0110014/APP/7.6].**
Cumulative Impact	There is a complete failure to assess correctly the cumulative impact of the East Pye Scheme, not only because new developments have been proposed since the launch of the statutory consultation (e.g. Tasway) but also because there is a cumulative impact from all the constituent parts of the East Pye Scheme acting in combination. The quantity of land impacted in terms of visual impact, impact on PROWs, hydrological issues, loss of farmland, glint and glare, impact on tourist businesses etc.., is enormous. Assessing these impacts individually is in no way a proper analysis of the total combined impact of all these aspects on the area. The statutory consultation doesn't even begin to analysis these overlapping cumulative impacts. Hempnall Parish Council asked for these combined impacts to be assessed in our response to the scoping opinion.	Yes	The impact of solar developments (both existing and forthcoming) in the areas surrounding the Scheme has been fully assessed in each relevant chapter and summarised in **ES Volume 1, Chapter 19 - In-Combination Effects Assessment [EN0110014/APP/6.1.19]**. The potential impacts from the Tasway Energy Park were not included at the PEIR stage as the project entered the public domain during the statutory consultation period for this project. The project has now been placed on an indefinite hold.

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Socio-Economics	The proposals grossly underestimate the importance of the tourist industry in South Norfolk. In total tourism contributes almost £3Billion annually to the Norfolk economy, a very significant proportion of this is generated in South Norfolk. The presence of over 2500 acres of solar panels and associated infrastructure would seriously harm this very important element of the local economy. Visitors to South Norfolk come to experience a tranquil unspoilt countryside, this scheme would ruin that experience.	No	**ES Volume 1, Chapter 14 - Socioeconomics [EN0110014/APP/6.1.14]** considers environmental effects arising as a result of the Scheme, in relation to tourism and accessibility and desirability of recreational facilities. This includes a detailed assessment of the likely impacts from the Scheme on the tourism economy and on individual tourism and recreation facilities and assets in the Scheme's Zone of Influence. This accounts for potential impacts on PRoW, impacts on tourism and visitor destinations, potential impact businesses in the areas immediately impacted by the Scheme. During the construction phase there is the potential for the Scheme to have some disruption to the tourism industry relating to visits to attractions within immediate proximity of the Order Limits associated with reduced amenity value. However, there is the potential for some beneficial effects to the tourism industry, associated with additional expenditure created by the construction workforce. For example, there is the potential for the Scheme's construction workers to visit restaurants and cafes in the local area, providing additional revenue for these businesses and in turn supporting the local tourism sector. It is therefore anticipated that the Scheme will have a low magnitude of impact on the tourism industry in South Norfolk. This would continue during the operational phase, where impacts associated with construction activities, such as HGV movements and construction plant noise, would no longer be present. The **OCEMP [EN0110014/APP/7.1]** commits to targeted construction mitigation measures such as offsets from roads, PRoWs, and selective removal of parts of the Scheme to ensure impacts on the landscape as an asset for the desirability of the area for tourism is minimised.

1.12 National Highways

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and Access	National Highways is concerned that the project could have significant implications for the SRN during construction, most notably on the A47. It is, however, considered unlikely that once East Pye Solar Farm is complete there will be any impact upon the SRN, except for maintenance access.	Yes	The Applicant has engaged with National Highways (NH) during the preparation of the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES [EN0110014/APP/6.1].** That engagement has indicated to NH that the forecast effects on the SRN (at A47) during the construction period; operational period; and decommissioning will be negligible. In accordance with the ES Transport and Access assessment, which follows IEMA guidance, the effects would be deemed not significant. That assessment is captured within the TA and ES and will be captured within a Statement of Common Ground between NH and the Applicant.
Statement of Common Ground	National Highways is keen to work collaboratively with the Applicant to consider and address the potential impacts of the proposal and ensure the SRN is not adversely affected, particularly during the construction period. It is anticipated that these issues (not exhaustive) will inform future discussions and form the basis of a Statement of Common Ground between National Highways and the Applicant. The Statement of Common Ground will then reflect progress made and clarify outstanding issues for resolution	No	The Applicant intends to prepare and agree a Statement of Common Ground with NH during the Examination.
Transport and Access	Due to the proximity of the project to, and interactions with, the A47, National Highways seeks to continue active engagement and discussions with the developer of the scheme to overcome potential issues and areas of concern that need to be resolved in advance of the DCO application being submitted.	Yes	The Applicant has engaged, and will continue to engage, with NH; however, it is shown in the **ES [EN0110014/APP/6.1]** that effects on the SRN will be negligible and that there are no discernible transport and access impacts on the SRN during the construction, operational or decommissioning phases of the Scheme.
Transport and Access	Section 11.2.65 sets out the scope for the personal injury collisions (PIC) within the study	No	Accident data has been obtained from NCC for the five-year period between 2019 and 2024. That data considers apparent clusters and trends and

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	area. National Highways would recommend obtaining the accident data from the local highway authorities based on the study area and include the relevant junctions linking to the SRN. The data should be inclusive of the full STATS-19 dataset including locations, timings and causation, and it is important to note that the assessment year of 2020 (this includes the period from March 2020 until August 2021 (inclusive)) will not be accepted as representative due to the COVID-19 pandemic.		reports on those within the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** and **Environmental Statement [EN0110014/APP/6.1]**. The transport and access evidence shows that there are no discernible effects or impacts on the SRN and as such no effects on PICs on that network. On the basis of not identifying an impact or safety concern on the relevant links and junctions on the SRN the STATS-19 dataset was not utilised.
Transport and Access	Section 11.3 set out the study area for the assessment for Transport and Access Assessment, which has been defined based on the area where there are likely to be transport effects resulting from the construction of the project. This approach is considered appropriate by National Highways	No	The Applicant notes this comment and thanks NH for their agreement.
Transport and Access	This approach is considered appropriate by National Highways. National Highways recommends the Study Area is extended to any SRN junctions that have been identified as likely to experience an uplift in traffic during construction in the AM and PM peaks. National Highways requires junction impact assessments to be undertaken on junctions experiencing an increase of 30 additional trips during the peak periods, at this stage of the review, the trip generation and trip distribution is unknown. National Highways recommends the applicant seeks to agree the scope with us of junction modelling in each of these locations.	Yes	The Applicant notes this comment and thanks NH for their agreement. The **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES [EN0110014/APP/6.1]** set out the assessment of the distribution of traffic associated with the Scheme during construction, operation and decommissioning forecasts that there will be negligible changes to traffic on the SRN during daily peak periods. No traffic modelling is therefore proposed. Whilst the Study Area was not formally extended, a future year (2029 peak construction year) cumulative assessment of the relevant links and junctions on the A47/A11 was undertaken and discussed with NH in November 2025.
Transport and Access	National Highways is not currently aware of the project's requirements for Abnormal Indivisible	Yes	The Applicant acknowledges this policy in relation to the movement of transformers and high voltage electrical cabling, where those items are

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	Loads (AILs). Should the project require AIL deliveries, it should be noted that National Highways follows a government Water Preferred Policy, which means we would expect the loads to arrive via the nearest suitable port of entry.		manufactured outside of the UK or are of UK origin and marine transportation represents a viable sustainable alternative to road movement. Analysis has been undertaken of the anticipated routeing of the transformers and high voltage cable drums which will form the primary AILs associated with the construction of the Scheme. Those items are forecast to arrive in the UK by marine transport at either Harwich, Lowestoft, Felixstowe or Ipswich. They will then be transported to the Scheme by road along corridors researched by expert AIL advisors, Wynns. The road corridors will be confirmed with the affected Highway Authorities; police; and affected structures owners, in accordance with the standard Movement Order notification processes for STGO classed loads. Initial engagement with NCC and NH has been undertaken as part of the initial planning for the final approaches on the LRN. Final plans for routeing, including the use of NH roads, will be secured through Articles and Requirements of the DCO. An AIL summary report is provided as part of the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** appended to the **ES [EN0110014/APP/6.1].** AIL management measures are set out in the **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]**.
Transport and Access	National Highways will need to agree the routeing of any AILs that intended to use the SRN. further guidance can be found at https://nationalhighways.co.uk/road-safety/abnormal-loads-and-the-esdal-system/. National Highways recommends discussing this matter before a decision is made on the proposed route to agree a workable and acceptable strategy in principle.	Yes	The road corridors to be used for AIL movements will be confirmed with the affected Highway Authorities; police; and affected structures owners, in accordance with the standard Movement Order notification processes for STGO classed loads. Initial engagement with NCC and NH has been undertaken as part of the initial planning for the final approaches on the LRN. Final plans for routeing, including the use of NH roads, will be secured through Articles and Requirements of the DCO including a Requirement to produce a CTMP confirming AIL routeing and management measures. An AIL summary report is provided as part of the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** appended to the **ES [EN0110014/APP/6.1].** AIL management measures are set out in the **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]**.

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Transport and Access	Table 11.14 of the Transport and Access chapter of the PEIR sets out the anticipated Construction Traffic Data for the project. The impact on specific junctions, including on the A47 are currently unknown, and therefore National Highways requires additional assessments of the junctions to understand the impact the project may have and if any physical mitigation is required.	Yes	Assessment through **the ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** has demonstrated that forecast traffic distribution will have negligible effects on the SRN, well within the daily variation of the A47 and its junctions. That assessment is reported within the TA and ES. No further analysis is therefore proposed of the effects and impacts on the SRN.
Cumulative Impact	National Highways welcomes this approach to consider the cumulative impact of other projects within the draft order limits and zone of influence. National Highways will be particularly concerned around the cumulative impact of projects on the SRN, notably the A47.	Yes	The potential cumulative effect of major foreseen projects has been confirmed with NCC and is to be reported within the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11].** The ES has considered trip generation on the SRN including A47 and A11. Analysis has concluded that percentage impact on these links is well below IEMA Guidance thresholds (30%) and is therefore not considered significant.
Transport and Access	It is recognised that an Outline Construction Traffic Management Plan will be prepared and submitted in support of the DCO application, setting out management, mitigation and monitoring strategy for construction traffic for the scheme. As part of this process, National Highways will need to understand the impact of the development would have on the A47 during the construction period of the development and measures to manage and monitor the impact. National Highways recommends engagement with us regarding the Outline Construction Traffic	Yes	The Applicant welcomes on-going engagement with NH and has provided an **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]** as part of the evidence for the DCO Submission. Further, a detailed CTMP, substantially in accordance with the oCTMP, is secured through a Requirement of the DCO. It is shown, within the assessments of the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** that the effects on the SRN are, however, negligible. No direct mitigation is therefore proposed for the SRN.

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	Management Plan and the proposed measures to ensure these are suitable for the A47.		
Transport and Access	It is understood that a Worker Travel Plan will be incorporated within the Construction Traffic Management Plan. This section of the document should set out the strategy to reduce the vehicular impact of construction workers trips on the highway network through encouraging construction workers to travel to and from site via sustainable modes. National Highways will need to understand the impact that the development would have on the A47 during the construction period of the development and measures to manage and monitor the impact. National Highways recommends engagement with us regarding the Outline Travel Plan and the proposed measures to ensure these are suitable for the A47.	Yes	The Applicant welcomes on-going engagement with NH and has provided an Outline Construction Worker Travel Plan (Outline CWTP) as part of the **OCTMP [EN0110014/APP/7.6]**, as part of the evidence for the DCO Submission. The detailed CTMP secured through a Requirement of the DCO will incorporate a detailed CWTP. It is shown, within the assessments of the ES **Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES [EN0110014/APP/6.1]** that the effects on the SRN are negligible. No direct mitigation is therefore proposed for the SRN.
Transport and Access	In addition, National Highways will need to be satisfied that there are sufficient processes in place to ensure enforcement of the measures and the action that will be taken if these prove to be unsuccessful in ensuring forecast traffic numbers are not exceeded and where the Workers Travel Plan is not adhered to.	Yes	The Applicant has provided an Outline Construction Worker Travel Plan (Outline CWTP) as part of the **OCTMP [EN0110014/APP/7.6]**, as part of the evidence for the DCO Submission. The detailed CTMP secured through a Requirement of the DCO will incorporate a detailed CWTP. The detailed CWTP will include commitments to monitoring and review of targets. The monitoring and review governance process will allow NCC to feedback on the progress to targets such that adaptation can be agreed between the Applicant and NCC. It is shown, within the assessments of the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** that the effects on the SRN are, however, negligible. No direct mitigation is therefore proposed for the SRN. No specific measures are therefore proposed which will directly affect the SRN.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and Access	It should be noted that the signage strategy for the Construction Route is yet to be agreed. National Highways will need to agree any proposed signage to be located on the SRN.	Yes	A commitment to a signing strategy for approaches to the construction works is confirmed within the **OCTMP [EN0110014/APP/7.6]**. A detailed CTMP secured through the DCO will agree the final signage with NCC and NH. Seeking to avoid unwarranted infrastructure and maintenance burden on the Highway Authorities or Principal Contractor, it is not anticipated that signs will be required on the SRN. Routeing will be confirmed through the contractors' and hauliers' information to be provided at the time of contract.
Transport and Access	Please note that any proposals for monitoring equipment and measures that need to be implemented along the SRN will need to be agreed with National Highways. National Highways will need to be satisfied that there are sufficient processes in place to ensure enforcement of the measures and the action that will be taken if these prove to be unsuccessful in ensuring forecast traffic numbers are not exceeded.	Yes	It is shown, within the assessments of the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** that the effects on the SRN are, however, negligible. No direct mitigation is therefore proposed for the SRN. No monitoring equipment is therefore proposed for the SRN.
Construction and Decommissioning	More details on the decommissioning activities and methods should be provided within the Decommissioning Environmental Management Plan prior to the decommissioning phase commencing, addressing the impacts on the A47. It is expected that this will be developed in consultation with the Local Planning Authorities. National Highways requests to be consulted prior to decommissioning.	Yes	Further details on decommissioning activities have been set out in the **Outline Decommissioning Environmental Management Plan (ODEMP) [EN01100141/APP/7.3]**, submitted as part of the DCO application. Subject to the DCO being granted, the **ODEMP [EN01100141/APP/7.3]** will be developed into a detailed DEMP. This will be prepared in consultation with the Local Planning Authorities and relevant statutory consultees, including National Highways.
Transport and Access	Please note that any works along the SRN are to be subject to Walking, Cycling and Horse-Riding Assessment and Review (WCHAR), Road Safety Audit (RSA) in strict accordance with GG119 and environmental audits as detailed in the DMRB. The RSA 1 should not commence until the end of the preliminary design stage, when the design has been accepted in principle by us. The draft RSA brief should be shared with National Highways and	Yes	It is shown, within the assessments of the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** that the effects on the SRN are, however, negligible. No direct mitigation is therefore proposed for the SRN. RSAs will not be required on the SRN.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	the RSA should be undertaken before the DCO application is submitted, in line with DMRB requirements.		
Transport and Access	Any design hazards are to be assessed with a Safety Risk Assessment (SRA), prepared in accordance with DMRB GG104, with the view to eliminating the risk, where possible, or, if unavoidable, reducing it to as low as reasonably practicable.	Yes	It is shown, within the assessments of the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** that the effects on the SRN are, however, negligible. No direct mitigation is therefore proposed for the SRN. SRAs will not be required on the SRN.
Transport and Access	The map identifies Historic Railways Estate (HRE) assets within the study area for the proposed development. Further consideration of the proposal and associated development, such as construction traffic routes and cabling and must ensure the protection of these structures. National Highways recommends further engagement regarding this matter to ensure that assets (Historic Railway Estate) can be appropriately considered.	No	The Applicant has engaged with the Historic Railways Estate department at NH to establish whether its assets are affected by the Scheme. It was confirmed by email exchange that the Scheme will not be impacting any HRE assets.
Compulsory Purchase / Acquisition	National Highways will object to the compulsory acquisition of any of its land to safeguard our interests and the safety and integrity of the SRN. Further discussion regarding land requirements is recommended prior to submission of the DCO application.	No	It is not proposed that any land is acquired from NH as part of the construction, operation or decommissioning of the Scheme.
Protected Provisions	National Highways would welcome early discussions with the Applicant to work together to reach agreement on Protective Provisions. A copy of the National Highways' current standard Protective Provisions, which we would expect to be included on the face of the Order, is appended to this letter for your information.	No	Protective Provisions for the benefit of NH have been included at Schedule 14 to the **draft DCO [EN0110014/APP/3.1]**. The Applicant welcomes comments from NH on these protective provisions and will engage in discussions regarding these.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	National Highways reserves the right to expand, amend or clarify the protective provisions during the progressing of the Development Consent Order.		
Consultation and Engagement	Whilst National Highways remains supportive of the principle of the development, we would object to this scheme for the reasons given above should those matters not be resolved satisfactorily. National Highways reserves the right to expand, amend or clarify any of the issues in this Section 42 Consultation Response, and to produce additional grounds of objection to an Examining Authority during the Relevant Representations submission.	No	The Applicant makes note of this comment. The Applicant will engage closely with NH on any arising issues throughout the DCO process.

1.13 Historic England

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Cultural Heritage	Broadly speaking we support the approach taken by the applicant towards the historic environment. We appreciate it is a complicated scheme which encompasses a large area and spans across different heritage environments. This will encompass a complex range of heritage receptors including buried archaeological remains and above ground heritage assets. The impacts are likely to be both physical impacts through construction elements and changes to the significance of assets through development within	No	The Applicant welcomes this comment.

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	their setting. We are therefore pleased with the way the assessment presented within the PEIR chapters are progressing, and we acknowledge there are gaps in the data and analysis that has been presented, and that this is to be anticipated at this stage.		
Cultural Heritage	We note for example the Desk Based Assessment, Geophysical survey report, Settings assessment, the AP survey and the Gazetteer of Setting Assessment (Preliminary Environmental Information Report Volume 3 Appendix 10.1 to 10.14). We haven't seen these reports prior to the submission of the PEIR and we have not provided detail comments in relation to these reports. We note however that trial trenching has not been undertaken, and we would recommend further evaluation of the non-designated archaeology within the panel and substation areas. The substation site for example would be a priority. This is to ensure that any non-designated heritage assets with a policy equivalence are identified early in the development and whilst there is time to identify suitable mitigation.	Yes	A scheme of informative trial trenching agreed with NHES was undertaken to inform the **ES [EN0110014/APP/6.1]** the results of which are included as **ES Volume 3, Appendix 10.5 - Evaluation Trenching Report [EN0110014/APP/6.3.10.5]**.
Cultural Heritage	We note outline mitigation measures are presented within the Cultural Heritage and Archaeology (Chapters 10) of the PEIR. We recommend that the details of these measures are specified in the ES.	Yes	An Archaeological Mitigation Strategy has been submitted as **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]** and the measures contained within are outlined within the Additional Mitigation section of the **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**.
Cultural Heritage	All proposed mitigation must be secured through an appropriate mechanism. The key document would be a suitable worded requirement within the DCO supported by and Outline WSI, REAC and CoCP documents.	Yes	An Archaeological Mitigation Strategy has been submitted as **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]** (otherwise referred to as an outline WSI).
Consultation and Engagement	We recommend Historic England is a named party with the DCO and that we are consulted on the DCO wording in due course. We would also welcome the	No	The Applicant notes this and intends to coordinate and consult with Historic England on further engagement and details of the Scheme throughout the DCO examination.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	opportunity to comment on these approaches and the mechanisms for securing them prior to the submission of the ES.		
	We can also confirm we have not been consulted to date by the applicant and recommend that Historic England are engaged as a statutory consultee prior to the case being examined.	No	Historic England has been identified as a Statutory Consultee, and the Applicant has consulted appropriately with Historic England throughout the process and will continue to be so.
Cultural Heritage	This chapter *[Chapter 5: The Scheme]* includes basic description of solar arrays, substations, battery storage and underground cabling. The PEIR is based on limited intrusive archaeological works. The following comments are limited by this. We understand that additional investigative works are going to inform the ES and the various elements of the design of the scheme might yet change.	Yes	Trial trench evaluation results have been used to inform the design of the Scheme, and the **ES [EN0110014/APP/6.1]** has been progressed accordingly in comparison with the PEIR. The location of elements with greater below ground impacts including the final location of the National Grid Substation, Project Substations and BESS in less archaeologically sensitive areas where possible. The results of the initial trial trench evaluation are included as **ES Volume 3, Appendix 10.5 - Evaluation Trenching Report (EN0110014/APP/6.3.10.5)**
Cultural Heritage	We acknowledge that the PEIR is a preliminary assessment, and we agree on the need for further works to improve the heritage baseline, calculations of the Significance of Effects and mitigation strategies. We look forward to reviewing the ES prior to submission to the DCO.	No	The Applicant notes this comment and agrees.
Cultural Heritage	5.1.6 summarises the elements included in the proposed scheme. Several of these elements would have a below-ground impact, which in turn could affect buried archaeological remains.	No	The Applicant notes this comment and agrees.
Cultural Heritage	It is noted that the mounting structures for the PV arrays would be secured either using pile-driven or screw-mounted foundations (Section 5.2.10), or through the use of concrete ballast foundations in areas of archaeological sensitivities (Section 5.2.11). We are pleased to see that avoidance of archaeological remains forms part of the embedded mitigation strategy.	No	The Applicant welcomes this comment.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Cultural Heritage	Several of the elements of the proposed scheme could have quite deep impacts. For example, some of the structures may require piled foundations up to a maximum depth of 12m. This includes the Substations, the National Grid Substation, Grid Connection Infrastructure and the BESS (Table 5.2). If piling options are going to be used, then the impacts that this may have on buried archaeological and paleoenvironmental remains needs to be considered.	Yes	Comments raised have been assessed within Section 10.8 Assessment of Likely Affects included in **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]** and mitigation of impacts on the archaeological resource is outlined in the **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]**.
Cultural Heritage	The below ground impacts of some of the elements have not been defined. This includes the Conversion units/Inverters, the Switchgears and the Pylons. Information is needed so that it is clear if/how buried archaeological remains may be impacted by the proposed development.	Yes	Below-ground impacts are assessed in **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]** and mitigation is covered in **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]**.
Cultural Heritage	5.2.58 states that the Cable Route Corridor will be between 1.2m and 1.7m wide and 2m deep. Excavation of the cable trenches could impact below ground archaeology and paleoenvironmental remains. It is understood that the desk-based assessment of the Cable Route Corridor has not yet been completed and so at this stage the potential impact of this element is not clear.	Yes	A desk-based assessment of the CRC forms part of **ES Volume 3, Appendix 10.2 - Archaeological DBA** [**EN0110014/APP/6.3.10.2** and the potential impacts of the CRC are assessed within Section 10.8 Assessment of Likely Affects included in **ES Volume 1 Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]** Further evaluation of the CRC comprising geophysical survey has been agreed with the NCCHES and will be carried out Pre-Consent to inform the need for and extent of further mitigatory works, as outlined in the **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]**.
Cultural Heritage	5.2.63 states that trenchless cable route crossings may be required at key locations, constructed using Horizontal Directional Drilling (HDD). The use of HDD will require the excavation of a launch pit and a reception pit. The pits will be 2m deep, 8m long and 4m wide (Section 5.2.64), and so the potential impact on heritage will need to be considered not only for the HDD cable route, but also for the launch and reception pits.	Yes	The use of HDD has been addressed in paragraph 10.8.12 **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**.
Cultural Heritage	A lubricant is needed during the HDD process, bentonite slurry, which can result in bentonite slurry outbreak. The	Yes	Potential effects of bentonite has been addressed in paragraph 10.8.12 of **ES Volume 1, Chapter 10 - Cultural Heritage**

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	potential impacts of bentonite slurry on heritage will need to be considered in terms of both the direct and indirect impacts that this may have. This needs to be considered in the Environmental Statement, and mitigation included in the Written Scheme of Investigation for archaeological mitigation where necessary.		**[EN0110014/APP/6.1.10].** it is not considered that bentonite poses any significant risk to below ground archaeological remains.
Cultural Heritage	5.2.76 states that new woodland belts and tree planting will be created as part of the Green Infrastructure. In addition to the position of planting, the choice of trees will need to be considered due to the way the root systems of different species of trees grow (e.g. see the Oxford Archaeology report 'Assessing the Impact of Tree Roots on Archaeology' (2024), Chapter 6: https://knowledge.oxfordarchaeology.com/library/12564).	Yes	This is covered in **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]** and **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]** and an indicative species list is included in the **outline Landscape and Ecological Management Plan (oLEMP) [EN0110014/APP/7.4**], which has been informed by Historic England guidance and the Oxford Archaeology report referenced in this comment. Species will be finalised during requirement of discharge at detail design.
Cultural Heritage	It is noted that the scheme will be in operation for 60 years (Section 5.5.13) and that the cables, foundations and below ground infrastructure will be left in situ during the decommissioning phase (Section 5.5.28 & 5.2.59). It should be stated in the Cultural Heritage chapter if this may impact the future application of geophysical surveys in the area.	No	Engagement on this point is ongoing to seek clarification. The Sites have already been subject to geophysical survey and any impacts on significant remains will have been mitigated prior to the operational phase. We also cannot predict what technological advances will be made in the intervening period.
Landscape and Visual	Historic England is content with the general approach taken to the landscape and visual assessment. The assessment of the View Locations (Figure 7.5 – 7.7, Volume II) is helpful and gives sufficient information of what would be provided, and we welcome use of photomontages (Volume III, Appendix 7.6).	No	Photomontages have been produced as part of the ES and can be found in **ES Volume 1, Chapter 10 - Cultural Heritage, Figures 10.1** to **Figure 10.32 [EN0110014/APP/6.2.10.1** to **EN0110014/APP/6.2.10.32]**.
Cultural Heritage	However, we strongly recommend that heritage-specific View Locations are agreed with Historic England prior to the publication of the ES and that the ES provides a heritage-specific viewpoint assessment, either as an addendum to the LVIA or as a standalone document. This should also include heritage-specific photomontages and wirelines as part of the	No	Heritage specific view locations were the subject of further consultation with Historic England during a Teams meeting, the Applicant also sent follow-up plans showing the specific viewpoints and received no further correspondence from Historic England on this. The above mentioned, has been included within **ES Volume 3, Appendix 10.1 – Heritage Statement [EN0110014/APP/6.3/10/1].**

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	Visualisations. Cumulative views across historic landscapes should also be taken into consideration.		
Landscape and Visual	The quality of reproduction, scale and colour schemes used in these above-named figures is not providing clarity for users. We request that this be improved.	No	The Applicant notes this. The figures have been prepared in line with current industry standards for visualisation, including resolution, colour accuracy, and presentation format. At the document scale required for submission, some fine detail may appear reduced; however, all figures can be viewed digitally at full resolution, where the clarity, legibility, and intended level of detail are fully maintained. Care has also been taken to ensure that heritage visualisation and wireline figures follow the same format as the landscape figures.
Landscape and Visual	Furthermore, the South Norfolk Draft Landscape Susceptibility SPD is a material consideration and should be used in assessing the site's landscape sensitivity, as required by South Norfolk's Local Plan.	No	South Norfolk Landscape Susceptibility SPD has been reviewed as part of **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]**. The SPD has been used to inform the sensitivity assessment of the Landscape Baseline. However, please note that the SPD cannot be directly applied to this Scheme due to differences in the overall methodology.
Cultural Heritage	9.2.15 states that there is the potential for contaminants to be mobilised during the construction works. It should be noted that contaminants can impact buried archaeological remains by making sites inaccessible for further work due to health and safety issues. The presence of contaminants can also limit the scientific assessments that could be applied to archaeological remains in the future, such as radiocarbon dating.	No	Potential contamination is addressed by **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**. This concluded that potential impacts on archaeological remains from contaminants is not a significant risk.
Cultural Heritage	We would recommend that the potential impacts of contamination on heritage is considered, and that the Historic England document 'Land Contamination and Archaeology' (2017) is referred to: https://historicengland.org.uk/images-books/publications/land-contamination-and-archaeology/.	No	The Applicant notes this and has referred to this document within **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**.
Cultural Heritage	9.4.21 outlines the geology recorded in the Study Area, which includes peat and alluvium. It should be noted that	No	Further consultation on this point is ongoing. Discrete peat deposits are recorded only within CRC7. These deposits are present only within

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	peat has high potential to preserve archaeological and paleoenvironmental remains of value that can contribute to our understanding of landscape and environmental change over time.		CRC7, adjacent to the Hempnall Beck. A trenchless crossing will be used at this location, beneath the peat deposits (if present) will in any event be considered to be used in this area. Further, no features of geoarchaeological interest were identified during the evaluation, the results of which are detailed in **ES Volume 3, Appendix 10.5 - Evaluation Trenching Report [EN0110014/APP/6.3.10.5]**.
Cultural Heritage	9.6.5 states that works associated with the construction and decommissioning of the Scheme, such as the movement of construction vehicles and soil stripping, can contribute to ground compaction. The potential impact of compaction on buried archaeological remains should be considered as this could result in physical damage and potentially changes to the preservation of an archaeological site.	No	Potential impact of compaction on buried archaeological remains are addressed in Section 10.8 of **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10].** Where possible, elements of the construction phase of the Scheme with the potential to cause compaction have been sited away from archaeologically sensitive areas, and where not feasible to do so, will be subject to an appropriate level of mitigation as outlined in the **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]**.
Cultural Heritage	10.3 Study Area – We agree with the proposed extents of the study areas for different heritage assets and welcome the flexible approach based on the Zones of Theoretical Visibility and ground-truthed walkover surveys	No	The Applicant welcomes this comment.
Cultural Heritage	We agree that there are no designated heritage assets within the application site boundary (10.4.2).	No	The Applicant welcomes this comment.
Cultural Heritage	10.2.2 refers to the sources that were consulted to inform the chapter. The Regional Research Framework was referenced, but it should be noted that a revised version was published online in 2021 and that this supersedes the 2011 version: https://researchframeworks.org/eoe/. We would recommend that the research themes and questions within the more recent version are considered for the archaeological work.	No	The Applicant notes this and has considered which research themes and questions are relevant to the Scheme. These are detailed in the **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6].**
Cultural Heritage	It was noted that the BGS borehole data was not consulted as part of the archaeological assessment. Information about the geology of an area can help understand the archaeological potential and the likelihood for different types of preservation environments (e.g. waterlogging/anaerobic preservation) to be present in an area. We feel that this is a missed opportunity,	No	BGS borehole data has been consulted but is extremely limited for the Order Limits. This is listed and explained as part of the assessment methodology in **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**.

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	particularly as the presence of peat and other organic deposits has been highlighted in other chapters (e.g. Chapter 9 (Water Environment) and Chapter 16 (Ground Conditions)).		
Cultural Heritage	We therefore recommend this is addressed as a matter of priority for this development and that an approach which integrates GI testing data and geoarchaeology is combined to create a preliminary deposit model. This would need to be supplied as an appendix in the ES.	No	Consultation on this point is ongoing. GI testing will be undertaken for post-determination of the Scheme. As GI will be undertaken post-consent (this was also stated at PEIR stage in the relevant chapter), and there is no particular geoarchaeological sensitivity identified, a deposit model would not have been a useful addition to the Applicant's assessment at this stage. Peat deposits are recorded within CRC7 but any potential impact on these have been subject to embedded mitigation in the form of trenchless crossings. There is generally low geoarchaeological potential identified to date throughout the rest of the Order Limits. The need for and extent of geoarchaeological assessment is covered by **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]**.
Cultural Heritage	It is noted that a programme of pre-determination trial-trenching has not yet been completed, but that the results will be presented in the Environmental Statement (Section 10.2.20 & 10.5.3). We are pleased that this work will be carried out ahead of the examination, but can it be clarified if trial-trench evaluations will be carried out over the array and the cable route corridor pre-determination?	No	Following conversations with the NHES, trial trenching of the Sites has been completed to inform the **ES [EN0110014/APP/6.1]** but the evaluation of the CRC has been agreed for post-submission of the DCO.
Ground Conditions	It is noted that a geophysics survey was completed in March 2025, but that additional work will be required in areas where the scheme has been extended (Section 10.2.22). It is noted that the geophysical survey has so far focused on the PV Array areas (Appendix 10.12) and not on the Cable Route Corridor (Section 10.2.23). Can it be clarified if a geophysical survey will be carried out on the Cable Route Corridor as well?	No	Geophysical survey of the Cable Route Corridor is being completed in February to April 2026.
Cultural Heritage	10.2.5 We welcome the decision to scope indirect impacts (Solar PV Arrays, BESS and Substation areas)	No	The Applicant welcomes this comment.

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	to designated and non-designated heritage assets during the decommissioning phase into the ES.		
Cultural Heritage	Section 10.4 presents the Baseline Conditions of the proposed development area. It is noted that the summary discusses the known archaeological sites and finds that have been discovered but does not discuss the paleoenvironmental potential. This should be included in the Environmental Statement to ensure that the full archaeological potential is understood.	No	A total of 82 environmental samples were taken during the trial trench evaluation undertaken to inform the ES to determine the environmental potential of the Sites. Palaeoenvironmental potential is generally low and preservation levels within the collected samples was very poor. Details of this are included within **ES Volume 3, Appendix 10.5 - Evaluation Trenching Report [EN0110014/APP/6.3.10.5]**
Cultural Heritage	It is noted in Chapter 16 (Ground Conditions) that there is the potential for organic deposits, such as peat to be present in key areas. This includes Site 5, where Head has been recorded that can locally include lenses of peat; Site 7 where Alluvium has been recorded that can contain layers of peat, and the Cable Route Corridor where Head, Alluvium, River Terrace Deposits and peat has been recorded (Table 16.7). All of these deposits have the potential to preserve evidence of how the landscape and environment changed over time, placing the archaeological sites into context. The River Terrace Deposits may also contain palaeolithic archaeological remains.	Yes	The design of the Scheme will be informed by a ground investigation, to be undertaken post-consent, which will identify the ground conditions present within each Sub-Site as relevant. Discrete peat deposits are recorded only within CRC7. These deposits are present only within CRC7, adjacent to the Hempnall Beck, within a County Wildlife Site that is also a designated area of irreplaceable fenland habitat. Whilst the ecological constraints in this area alone would prevent the use of shallow trenching, the practical considerations of CRC7 mean that a trenchless crossing, beneath the peat deposits (if present) will in any event be considered to be used in this area. The design of the Scheme will therefore provide mitigation against damage to peat deposits. This is detailed in **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]**.
Cultural Heritage	It is stated in Section 10.5.7 that avoidance will form part of the embedded mitigation process through the design process, which is good to see. It is noted that work is continuing and will evolve as more information becomes available.	No	The Applicant welcomes this comment.
Cultural Heritage	10.7.3 lists the additional mitigation that may be required, which includes open area excavations, archaeological watching briefs and preservation. It is noted that geoarchaeological work and deposit modelling have not been included in the list of additional mitigation, but we	No	It is not possible to firmly identify the need for and location of any geoarchaeological assessment at this stage. Once details are available the need for and scope of any geoarchaeological assessment will be agreed with NHES. This is noted within the **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**

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	feel that this may be required to investigate the areas where piling and HDD will be utilised. This would help to characterise and understand the deposits that may be impacted by the proposed works and their archaeological and paleoenvironmental potential.		**and ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]**.
Cultural Heritage	10.7.3 states that a full mitigation strategy will be presented in the Environmental Statement once the Trial Trench evaluation work has been completed. We would expect to see an Outline WSI included in the DCO submission that makes it clear what work will be carried out post-consent and how it will be carried out. This should include a scientific sampling strategy (e.g. environmental, dating and geoarchaeology) and should refer to the following Historic England documents: •Environmental Archaeology (2011): https://historicengland.org.uk/images-books/publications/environmental-archaeology-2nd/. • Radiocarbon Dating and Chronological Modelling (2022): https://historicengland.org.uk/images-books/publications/radiocarbon-dating-chronological-modelling. • Geoarchaeology (2015): https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/. • Deposit Modelling and Archaeology (2020): https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/.	Yes	An Archaeological Mitigation Strategy (fulfilling the same role as an outline WSI) is included in **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]** and was prepared in line with the stated guidance documents.
Cultural Heritage	10.9 Cumulative Effects – we welcome the assessment of cumulative effects of the scheme upon designated and non-designated heritage assets and below ground archaeological remains. Table 10.7 presents the	No	The Applicant welcomes this comment.

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	preliminary assessment of the impact of cumulative schemes on the historic environment.		
Cumulative Impact	Whilst we acknowledge that this is based on professional judgement and standard guidelines, we recommend that the cumulative assessment should include adjacent overlapping solar/BESS projects, specifically Tasway Energy Park; High Grove; The Droves; and Long Stratton BESS, in line with NPS EN 1 §4.2.5, EIA Regs Schedule 4(5) and PINS Scoping Opinion requirement 3.21.2; 3.21.3.	No	The identified schemes have been included, with the exception of the Tasway Energy Park which has been placed on indefinite hold. This is detailed further in **ES Volume 3, Appendix 2.4 - Cumulative Schemes [EN0110014/APP/6.3.2.4]**.
Cultural Heritage	Chapter 16 includes information of value to the archaeological assessment, including the details of the geology and the peat soils. We would recommend that this information is included in the archaeological assessments and discussions.	Yes	The archaeological baseline assessments include details of geology and soils, included within **ES Volume 3, Appendix 10.2 -Archaeological Desk Based Assessment [EN0110014/APP/6.3.10.2]**.
Ground Conditions	16.3.9 states that the potential of the scheme to impact on peat soils is limited to the loss of function due to excavation or compaction, drying due to loss of groundwater and wetting due to runoff from solar PV arrays. The loss of function of the peat and the drying of peat could impact the preservation of archaeological or paleoenvironmental remains that may be present. We would recommend that this issue is considered and that the Historic England document 'Preserving Archaeological Remains' (2015: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/).	Yes	Matters relating to archaeology are assessed within **ES Volume 1, Chapter 10 -Cultural Heritage [EN0110014/APP/6.1.10]**. It is noted that the only area within the Order Limits where the BGS record peat deposits is within CRC7. The peat deposits are co-incident with the area of the County Wildlife Site (CWS) and are immediately adjacent to the Hempnall Beck. As such the only works to be undertaken in the vicinity of the peat deposits are the trenchless crossing, which will happen at depth beneath the peat deposits and CWS.
Ground Conditions	Table 16.7 summarises the geology, as recorded by the BGS. This includes a number of deposits that could preserve evidence of value to understanding the landscape and environmental change over time (e.g. Head, Alluvium, Peat and River Terrace Deposits). The information needs to be incorporated into the archaeological assessment in Chapter 10.	Yes	Matters relating to archaeology are assessed within **ES Volume 1 Chapter 10 -Cultural Heritage [EN0110014/APP/6.1.10]**. The Historic England document 'Preserving Archaeological Remains' has been considered in **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Ground Conditions	It is stated in Section 16.5.1 that intrusive ground investigations (GI) and assessment will be undertaken prior to construction, and that the results of the work will inform the detailed design of the scheme. The GI works will also be of value to the archaeological assessments, particularly in the areas where HDD has been proposed. It will help to characterise and understand the sequence of deposits and their archaeological and paleoenvironmental potential. We would recommend that a Geoarchaeologists is included in designing the scope of this work and in the assessment of the results in order to maximise the value of the obtained information.	Yes	The Applicant notes this. This will be considered as part of the post-consent ground investigation works. Details in relation to geoarchaeological work is included in **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]**, however this work is the subject of ongoing consultation and engagement.
Cultural Heritage	16.5.1 also states that temporary dewatering may be required. It will be important to understand where this may be needed and the potential impact that it may have on the preservation of buried archaeological and paleoenvironmental remains, particularly if there is the potential for waterlogged remains to be present in the areas where peat has been recorded.	No	Any requirements for temporary dewatering are likely to be limited to trenchless crossing works only, with the design of these and requirement (if any) for temporary dewatering to be refined following the completion of the post-consent GI works. As noted above, the only area within the Order Limits where the BGS record peat deposits is within CRC7. The peat deposits are co-incident with the area of the County Wildlife Site (CWS) and are immediately adjacent to Hempnall Beck. As such the only works to be undertaken in the vicinity of the peat deposits are the trenchless crossing, which will happen at depth beneath the peat deposits and CWS and thus drying of the peat is considered highly unlikely, especially given its immediate proximity to Hempnall Beck.
Cultural Heritage	Historic England has concerns about the current level of uncertainty that exists regarding the nature and magnitude of potential impacts on designated heritage assets set out in the PEIR. This is due in part to aspects of the design and layout of the proposed development still being established at this stage	Yes	The findings of the PEIR has been updated for the purposes of the ES. Assessments on heritage assets are found in **ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10]** and supporting **ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3.10.1].** The Applicant's progress with the evolution and design refinement of the Scheme proposals after the Phase Two consultation has been informed with the findings of the ES.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Cultural Heritage	We note that further surveys and assessments are being undertaken with the results to be included in the final DCO application. We recommend that the outstanding archaeological surveys and assessments are completed as soon as possible so that they can fully inform the design and layout of the proposed development.	Yes	These have been undertaken and, where relevant, have influenced the final design and layout of the Scheme. The suite of applications documents submitted by the Applicant includes **ES Volume 3, Appendix 10.2 - Archaeological Desk Based Assessment [EN0110014/APP/6.3.10.2]**, **ES Volume 3, Appendix 10.3 - Archaeological Geophysical Survey Report [EN0110014/APP/6.3.10.3]** and **ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/5.3.10.6].** **ES Volume 3, Appendix 10.3 - Heritage Assessment [EN0110014/APP/6.3.10.3]**, **ES Volume 3, Appendix 10.4 - Aerial Investigation Mapping Survey [EN0110014/APP/6.3.10.4]** and **ES Volume 3, Appendix 10.5 - Evaluation Trenching Report [EN0110014/APP/6.3.10.5]** are also included with the application.
Ground Conditions	Of particular concern in relation to ground survey and further evaluation would be: Further assessment of the cable route in order to develop an appropriate and informed approach to mitigation.	No	The design of the Scheme, including the CRC, will be informed by a ground investigation, to be undertaken post-consent.
Cultural Heritage	Of particular concern in relation to ground survey and further evaluation would be: Further assessment of the paleoenvironmental and geoarchaeological deposits in order to inform the archaeological chapter of the ES mitigation, and design of cable installation	No	Further engagement is ongoing on this point.
Cultural Heritage	We have also identified the following main areas which in our opinion require further assessment and need to be addressed in the ES: The cumulative impact of adjacent solar/BESS projects.	Yes	Cumulative impacts are addressed in Section 10.11 of **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**
Cultural Heritage	We have also identified the following main areas which in our opinion require further assessment and need to be addressed in the ES:	Yes	Further consultation has been undertaken with Historic England on this comment and effort has been made to increase the clarity of figures included within **ES Volume 3, Appendix 10.1 - Heritage**

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	The quality of reproduction, scale and colour schemes used in the Historic Environment maps provided does not providing clarity for users and could be improved.		**Statement [EN0110014/APP/6.3.10.1]** and **ES Volume 3, Appendix 10.2 - Archaeological Desk Based Assessment [EN0110014/APP/6.3.10.2]**.
Culture and heritage	We have also identified the following main areas which in our opinion require further assessment and need to be addressed in the ES: We have also recommend that the LVIA approach is amended to include heritage specific viewpoints. This is to ensure the information provided is easily accessible. Historic England should be consulted on the proposed viewpoints.	Yes	Heritage specific viewpoint locations have been agreed during a Teams meeting with Historic England and are included within **ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3.10.1]**.

1.14 National Grid Electricity Transmission

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Consultation and Engagement	Due to the proximity of some of our existing or future assets, NGET wishes to express their interest in further consultation while the impact on our assets is still being assessed.	No	The Applicant has engaged constructively with NGET, from the initial non-statutory Stage One consultation through to the preparation of the DCO application. During the statutory Phase Two consultation, the Applicant undertook consultation with NGET under the Planning Act 2008. This is evidenced throughout the **Consultation Report [EN0110014/APP/5.1]**. The Applicant notes the importance of NGET assets in case of interaction with Scheme infrastructure and will aim to continuously engage and consult with NGET on this issue.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Protected Provisions	Where the Promoter intends to acquire land, extinguish rights, or interfere with or work within close proximity to any of NGET's apparatus and land, this will require appropriate protection and further discussions on the impact of its apparatus and rights.	No	Protective Provisions in favour of NGET have been included in Schedule 14 to the **draft DCO [EN0110014/APP/3.1]**. The Applicant welcomes comments from NGET on these protective provisions.
Cumulative Impact	It should be noted that there may be further interactions with additional new strategic infrastructure where the projects are in their early development.	No	An assessment of cumulative effects of the Scheme and cumulative schemes (as shown in **ES Figure 2.1 - Cumulative Developments [EN0110014/APP/6.2.2.1]**) is assessed within **ES Volume 1, Chapters 6 – 18 [EN0110014/APP/6.1.6 – 6.1.18]**). A summary is also provided in **ES Volume 3, Appendix 2.4 - Cumulative Schemes [EN0110014/APP/6.3.2.4**]. Which has found there are likely no significant effects. The assessment is based on the data available from other proposed and committed developments and associated information which is currently in the public domain. The assessment of in-combination effects is presented in **ES Volume 1, Chapter 19 – In-Combination Effects Assessment [EN0110014/APP/6.1.19]**.
Cumulative Impact	NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.	No	The Applicant has engaged constructively with NGET, from the initial non-statutory Stage One consultation through to the preparation of the DCO application. During the statutory Stage Two consultation, the Applicant undertook consultation with NGET under the Planning Act 2008. This is evidenced throughout **the Consultation Report [EN0110014/APP/5.1]**. The Applicant notes the importance of NGET assets in case of interaction with Scheme infrastructure and will aim to continuously engage and consult with NGET on this issue.
General	If any changes in ground levels are proposed either beneath or in close proximity to our existing	No	The Applicant will consider the proposed requirements.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances. The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance. Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.		
Landscape and Visual	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	No	Trees and woodland planting are offsets away from existing overhead lines applied. Only grass seeding is proposed under existing overhead lines. Details of the Scheme is presented in **ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1].**
General	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support")	No	The Applicant notes this comment. None such works are currently anticipated by the Applicant to be necessary.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	drawings can be obtained using the contact details above. National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place. Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.		

1.15 Saxlingham Nethergate Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Cultural Heritage	In addition to the fundamental objections set out above, the Parish Council has detailed objections to the impact of the scheme on the Saxlingham Green Conservation Area, some listed buildings, the public rights of way that will be affected by the scheme and on the potential for the scheme to increase flooding of The Street and houses fronting it.	Yes	Likely effects on designated heritage assets have been assessed in **ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10]**. Embedded mitigation in the form of setbacks and landscape screening has been incorporated to minimise any impact on the conservation area. **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** concludes that there are no significant residual effects on non-motorised users despite some PRoWs intersecting the road network around the Scheme. The **Outline Public Rights of Way and Permissive Paths Management Plan [EN0110014/APP/7.8]** has been prepared to support the DCO and sets out the overarching principles, management measures and commitments for protecting and managing Public Rights of Way during the operational, maintenance and replacement activities associated with the Scheme. The LVIA (presented in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7]**) has assessed effect on local Landscape Character and visual effects on receptors using PRoWs, including those around Saxlingham Nethergate and Hempnall (Sites 5 and 7) Old Hall Farm in Woodton (Site 10). Mitigation includes woodland blocks, tree belts, and hedgerow planting to screen views and reduce visual intrusion. While a 500m buffer is not feasible due to land constraints, enhanced planting and careful siting will help protect views and the recreational experience. Detail of landscape mitigation is presented in **Outline Landscape and Ecological Management Plan (OLEMP), Appendix 2 - Figure 2 Green Infrastructure Strategy [EN0110014/7.4]**. The Order Limits is mostly located within Flood Zone 1, with limited areas of Flood Zones 2 and 3.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Strategy [EN0110014/APP/6.3.9.1] demonstrates that electrical infrastructure has a suitable freeboard above the modelled floodplains, up to and including the 1 in 1000 (0.1%) AP plus allowance for climate change floodplain. The Scheme within Sub-Site 8A has been amended so that Solar PV Arrays have been located outside of the eastern surface water flow route (combined Flood Zones 2/3), and outside of areas of 'low' to 'high' surface water flood risk as far as practicable. The Scheme complies with paragraph 027 of the NPPF PPG Flood Risk and Coastal Change in that the **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Strategy [EN0110014/APP/6.3.9.1]** demonstrates that the proposed Scheme has been designed so that electrical infrastructure has been located within areas of lowest flood risk as far as reasonably practicable and the design and embedded mitigation ensure that the infrastructure remains safe and operational from current and future surface water flood risk for its lifetime.
Scheme Description	There are also specific objections with regard to a proposed construction compound on Broaden Lane and the substation in the corner of field 7.	Yes	**ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4]** provides detail on the temporary construction compounds associated with the Scheme. Temporary construction compounds would be established in the locations set out in **ES Volume 2, Figure 4.2 - Indicative Construction Compound Locations [EN0110014/APP/6.2.4.2]**. The **ES [EN0110014/APP/6.1]** assesses the likely effects arising during construction of the Scheme and identifies appropriate mitigation where required. Landscape screening and development setbacks are proposed to minimise potential visual effects, and further information is presented in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7]**.
Cultural Heritage	The Conservation Area sits within a typically attractive Norfolk arable landscape. The proposed panels in sites 7c, 7e and 7g will radically and adversely change the landscape setting of the Conservation Area when viewed from the south, demonstrating that the applicants have not paid any regard to the statutory duty imposed by	Yes	Likely effects on designated heritage assets have been assessed in **ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10]**. Embedded mitigation in the form of setbacks and landscape screening has been incorporated to minimise any impact on the conservation area.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 that "…special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area…" We object to the detrimental impact of the scheme on the setting of the conservation area. The scheme may impact on the settings on listed buildings in or close to the Saxlingham Green Conservation Area but the full potential impact cannot be determined from the limited detail submitted with the scheme. The buildings whose settings might be particularly affected are listed grade 11 and are on The Green, Manor Farm Cottage, Manor Farmhouse and Manor Farm Barn, demonstrating that the applicants have not paid any regard to the statutory duty imposed by section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990 that "…special attention shall be paid to the desirability of preserving the building or its setting …" We object to the detrimental impact of the scheme on the settings of these listed buildings.		
PRoW and Recreation	There are no detailed plans showing how the PRoWs are to be accommodated within the scheme. It is already clear that footpaths FP5, FP12, FP13, FP27 will be very seriously and adversely affected by the proposals. Pleasant walks through an arable and treed landscape will be replaced by "walks in cuttings" between rows of 4.5m high panels that will industrialize the landscape. We object to the detrimental impact of the scheme on the PRoWs listed above.	Yes	Effects on PRoW are considered in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7]** and in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**. As detailed in the **Design Principles, Parameters and Commitments document [EN0110014/APP/7.18]**, a 15m buffer will be applied to PRoWs near the placement of Solar PV panels. As detailed in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7]**, offset and exclusion of solar PV panel development has been applied when in proximity to PRoWs, namely Hempnall FP2, FP3, FP4, Saxlingham Nethergate FP9, FP10, FP12, FP13, FP14

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			and FP27, and Woodton RB10 to reduce proximity of development allowing for sufficient space for landscape mitigation planting , and reduce potential effects to visual amenity for users of these routes.
Water Environment	The Parish Council and the residents on The Street are deeply concerned that the scheme will lead to increased flooding of The Street during periods of high rainfall, which are becoming more frequent with climate change. The last flooding of The Street, to a depth of some 15cm, occurred in December 2020 when two houses were also flooded. The Street is at the bottom of a catchment of some 7.25 sq km that includes the scheme site 7 to the south of Saxlingham Green. Any increased run off from these areas will exacerbate the flooding of The Street in times of heavy rain. In the absence of a properly worked flood risk assessment the Parish Council objects to the scheme as being likely to increase food risk.	Yes	The areas of the Order Limits within or near Saxlingham Nethergate Parish will mostly consist of PV Solar Arrays. These areas will have a grass cover maintained at suitable height which will promote soil stability and increase ground roughness, slowing down flow of runoff across the fields. Further details are set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**. Surface water management in relation to construction and decommissioning is covered in **the Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]** and **Outline Decommissioning Environmental Management Plan (ODEMP) [EN0110014/APP/7.3]**.
Scheme Description	The scheme proposes a construction compound on Broaden Lane adjacent to FP 12 on the main approach to the village from the south. This compound will have a negative effect on the appearance of the village when approached from the south and its traffic implications for the narrow lanes in the village have not been modelled.	Yes	The several chapters in Volume 1 of the **ES [EN0110014/APP/6.1]** assess the likely effects arising during construction of the Scheme and identify appropriate mitigation where required. Landscape screening and development setbacks are proposed to minimise potential visual effects. Construction effects are likely to be temporary in nature. **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.14]** provides details on what can be expected within the temporary construction of compounds. Temporary construction compounds would be established in the locations set out in **ES Volume 2, Figure 4.2 - Indicative Temporary Construction Compound Locations [EN0110014/APP/6.2.4.2]**). The temporary construction compounds would comprise: • Areas of hardstanding; • Car parking; • Site and welfare offices and workshops;

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			• Security infrastructure, including cameras, perimeter fencing and lighting; • Area to store materials and equipment; • Site drainage and waste management infrastructure (including sewerage); and • Electricity, water, waste water and telecommunications connections.
Scheme Description	The scheme proposes a substation in the corner of field 7F. This substation will be 43m x 65m x 6.5m high and will be prominent and have a negative effect on the appearance on the southern approach to the village.	Yes	Potential effects on Landscape Character have been assessed in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7].** Landscape screening and development setbacks are proposed to minimise potential visual effects. Sub-Site 7F includes areas around the edge of the land parcel for potential mitigation and enhancement – this area may include measures such as scrub planting, broadleaf woodland and the restoration of ghost ponds. As set out in the **OLEMP [EN0110014/APP/7.4**] Sub-Site 7F has been identified as an opportunity for an amenity space which could include dog walking. Within Sub-Site 7F opportunities for ecological enhancements also exist by diverting footfall from the existing PRoW away from the neighbouring SSSI through the creation of permitted paths through grassland.

1.16 Suffolk County Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Cumulative Impact	3.3 The Council is conscious that a significant number of renewable energy and other large scale infrastructure projects are under construction or being proposed in Suffolk, or in	Yes	The full list of cumulative schemes assessed is provided in **ES Volume 3, Appendix 2.4 - Cumulative Schemes [EN0110014/APP/6.1.6 - 6.3.2.4].**

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	nearby areas, resulting in impacts on Suffolk. This includes those within the general vicinity of the location of the proposed East Pye Solar project. 3.4 The Council is aware of several other projects in the area which may surface during the determination of this application and create effects that combine or interact with the East Pye Solar proposals. The Council considers it essential that the promoter's assessment of cumulative impacts includes all reasonably foreseeable projects, as per the Norfolk Vanguard judgement. 3.6 The Council notes that the promoter proposes to address cumulative effects in a separate chapter within the Environmental Statement (ES). SCC considers that it is necessary for assessments which are likely to have cross-boundary effects, such as those relating to transport, AILs and skills and employment, to include the relevant parts of Suffolk in their geographical scope.		Norfolk Vanguard is included in the list of cumulative schemes, presented in **ES Volume 3, Appendix 2.4 - Cumulative Schemes [EN0110014/APP/6.3.2.4]**. **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** provides the assessment of cumulative effects for transport and access. No Significant Effects have been identified across several areas (for example, 'severance', driver delay, amenity, road safety) during the construction and decommissioning phase. As no significant effects have been identified for receptors during any phase of the Scheme once embedded and secondary mitigation is taken into account, no additional mitigation measures for the Scheme are required. The cumulative effects on socio-economic aspects have been provided in a separate response in this document.
Socio-Economics	3.7 The Council has reviewed the East Pye Solar Preliminary Environment Information Report and provides the following comments with respect to skills, supply chain, tourism and broader socio-economic impacts. This response applies SCC's Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance (Appendix C), which establishes a framework for appropriately assessing the socio-economic impacts and making evidenced judgements against areas set out in NPS EN-1(5.13.4). The Applicant is expected (with the support of the local authorities and Suffolk County Council) to use and follow the supplementary guidance to develop an	No	The Applicant notes this positive response in relation to acknowledgement of methodological improvement within the socio-economic assessment. **ES Volume 1, Chapter 16 - Socio-Economics [EN0110014 /APP/6.1.14]** has included Suffolk County within consideration of baseline conditions and the **Outline Employment, Skills and Supply Chain Strategy (OESSCS) [EN0110014/APP7.10]** sets out a strategy for how local opportunities will be maximised, including consideration of skill requirements across Norfolk and Suffolk. The relevant ES Chapter gives due consideration to Suffolk County Council supplementary guidance on likely effects on Socioeconomic matters. Suffolk is included in assessments for this chapter alongside Norfolk and South Norfolk.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	appropriate and robust socio-economic impact assessment. 3.8 SCC recognises that the Applicant has now adopted an improved methodological framework as outlined in SCC's Energy and Climate Adaptive Infrastructure Policy Socio-Economic Supplementary Guidance (Appendix C) as requested by SCC in response to Scoping. 3.9 The PEIR now includes detailed estimates of employment by phase (construction, operation, and decommissioning), with breakdowns of gross, net, displaced, and indirect/induced jobs.. Section 14.6.22–14.6.23 and Table 14.21 provide a breakdown of the types of roles and their required skillsets during construction. SCC considers this a positive step towards what it expects in terms of assessment of socio-economic effects. 3.10 SCC is happy to see a socio-economic baseline assessment which covers several important points of data. However, this assessment should be improved in several ways. The geographical scope excludes Suffolk as a neighbouring authority, which can limit regional coordination. Additionally, there should be more specific data on supply chain capability and education assets that would enhance mitigation planning.		
Socio-Economics	3.11 SCC stated in response to Scoping that it expects the Applicant to conduct further analysis of cumulative impacts, including proactively assessing workforce displacement and competition, supply chain overlap, and housing and accommodation effects. The Regional Skills		**ES Volume 1, Chapter 14 – Socio-Economics [EN0110014/APP/6.1.14]** details the assessment of cumulative effects of the Scheme in respect of socioeconomics. The conclusion of this assessment is presented below: Construction phase

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	Co-ordination Function at Suffolk County Council can provide support for NSIP collaboration and identifying regional skills shortages. 3.12 The PEIR includes a dedicated section titled "14.9 Cumulative Effects", which addresses cumulative socio-economic impacts for: i. Jobs, Employment and Supply Chain ii. Skills and the Labour Market iii. Temporary Accommodation iv. Tourism 3.13 SCC considers this a positive step but would like to draw attention to some shortcomings which SCC expects to be rectified in the ES.		• It is considered that during the construction phase, there will be a Major Beneficial (Significant in EIA terms) cumulative effect on jobs, employment and the supply chain in South Norfolk, a Moderate Beneficial (Significant in EIA terms) cumulative effect in Norfolk and a Moderate Beneficial (Significant in EIA terms) cumulative effect in the East of England region. • Given the high sensitivity of skills and labour market in South Norfolk, and the large potential for upskilling opportunities to be created by the Scheme and cumulative schemes, it is considered that there will be a Moderate Beneficial (Significant in EIA terms) cumulative effect on skills in South Norfolk during the construction phase. • Given the low sensitivity of the receptor it is assessed that there will be a Minor Adverse cumulative effect on the temporary accommodation market in South Norfolk during the construction phase. • It is considered that there will be a Minor Adverse cumulative effect on the tourism industry in South Norfolk during the construction phase. Operation and maintenance • Given the number of cumulative schemes that will be supporting operational employment, with some of these incorporating large employment sites, it is considered that there is a potential for at least a Moderate Beneficial (Significant in EIA terms) cumulative effect on jobs, employment and supply chain in South Norfolk during the operation and maintenance phase. • There is potential for a Moderate Beneficial (Significant in EIA terms) cumulative effect on skills and the labour market in South Norfolk during the operation and maintenance phase. • It is considered that there will be a Negligible cumulative effect on the temporary accommodation market in South Norfolk during the operation and maintenance phase. • It is considered that there will be a Minor Adverse cumulative effect on the tourism industry in South Norfolk during operation and maintenance.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Cumulative Impact	3.14 Suffolk is not mentioned at all in the cumulative assessment, despite: i. Being a neighbouring labour market ii. Having existing NSIP activity (e.g. Sizewell C, Sea link, Lion link, National Grid Norwich to Tilbury) iii. Hosting affected commuter settlements and housing stock. 3.15 The PEIR's "cumulative effects" are scoped almost entirely around South Norfolk and Norfolk, omitting potential cross-border effects on Suffolk's skills, housing, and economy. This contradicts SCC's request to include Suffolk in spatial assessments and risks underestimating displacement or cross-boundary strain.	Yes	The assessment of cumulative scheme is in relation to other DCOs (including Norwich to Tilbury National Grid Project, The Droves Solar Farm and High Grove Solar has been set out within the technical chapters of the (ES: **Chapters 6-18 [EN0110014/APP/6.1.6 - 6.1.8]),** with the full list of cumulative schemes assessed provided in **ES Volume 2, Appendix 2.4 - Cumulative Schemes [EN0110014/APP/6.1.6 - 6.3.2.4]** which sets out the approach to identifying cumulative schemes. In principle, cumulative schemes have been identified on the basis of their potential to have a cumulative effect with the Scheme in accordance with Planning Inspectorate best practice guidance, irrespective of which local authority the scheme is within.
Cumulative Impact	3.16 There is no evidence of coordination with other NSIPs or engagement with SCC's Regional Skills Coordination Function (RSCF) or neighbouring promoters. The "collaborative" opportunities described remain speculative.	Yes	The Applicant has engaged with several developers within the region. This includes fortnightly meetings with The Droves Solar Farm from February 2025 to October 2025 during the pre-application period of these schemes, as well as a meeting in September 2025 with Aukera Energy regarding Tasway Energy Park. These meetings are detailed in the **Consultation Report [EN0110014/APP/5.1]**. The Applicant will continue to work closely with other developers in South Norfolk and Norfolk.
Cumulative Impact	3.17 While the PEIR makes broad assumptions (e.g. overlapping peaks, full workforce pressure), there is no scenario modelling or probability-based analysis.	Yes	**ES Volume 1, Chapter 14 – Socio-Economics [EN0110014APP/6.1.14]** contains scenario modelling and probability-based analysis for a range of categories, including employment and effects on tourism.
Cumulative Impact	3.18 Although significant cumulative effects are identified (e.g. major adverse impact on accommodation), no additional mitigation is proposed.	Yes	**ES Volume 1, Chapter 14 – Socio-Economics [EN0110014/APP/6.1.14]** presents the consideration of cumulative effects on temporary accommodation and other socio-economic impacts. The impact on the temporary accommodation market during construction and operation is considered to be a Minor Adverse Effect. As no significant adverse effects have been identified in this Chapter for receptors during any phase of the Scheme once embedded mitigation is taken into account, no additional mitigation measures for the Scheme are required.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Socio-Economics	3.19 The Council is concerned that the Applicant has underestimated the likely pressure on local accommodation markets, particularly during peak construction phases, and has not accounted for seasonal tourism pressures or cumulative NSIP demand. The Council requests that housing and accommodation impacts remain within the scope of the ES and that an independent assessment is undertaken.	Yes	The assessment of jobs, employment and the supply chain in **ES Volume 1, Chapter 14 – Socio-Economics [EN0110014APP/6.1.14]** concludes that 50% (worst case assumption) of the Scheme's construction workers is likely to be sourced from outside the East of England region. These workers may need to temporarily relocate to the local area for the duration of the construction period and therefore may require temporary accommodation. It is anticipated that these construction workers who already live in the East of England region will not need to temporarily locate. **ES Volume 1, Chapter 14 – Socio-Economics [EN0110014/APP/6.1.14]** details that 360 construction workers may need to seek temporary accommodation during peak construction activity. This is a reasonable worst-case scenario given that potential displacement of workers from other construction projects in the local and regional area is not factored into this calculation. Table 14.5 of **ES Volume 1, Chapter 14 – Socio-Economics [EN0110014/APP/6.1.14]** identified that the temporary accommodation market in South Norfolk is considered to be Low Sensitivity due to baseline conditions identify that there are a range of temporary accommodation options within South Norfolk, ranging from rooms in hotels, B&Bs, AirBnBs, for which there is availability. The Scheme will have a Medium magnitude on the temporary accommodation market, because even with accommodating all of the Scheme's peak construction workforce of 360 workers who are estimated to require temporary accommodation, there remains in the region of 374 rooms across South Norfolk that could be available for the wider market, indicating that the temporary accommodation market receptor is able to absorb some changes without fundamentally changing the baseline position. On this basis, the Scheme is considered to have a Minor Adverse effect on the temporary accommodation market in South Norfolk during the construction phase
Socio-Economics	3.20 The Applicant assumes that 50% of the construction workforce will be drawn from within the region but provides insufficient evidence. The	Yes	**ES Volume 1, Chapter 14 – Socio-Economics [EN0110014APP/6.1.14]** details that it is anticipated that a number of constructions jobs will be taken by

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	Council consider that further work is needed to assess the potential for workforce displacement and competition with existing projects and local employers.		people living outside of South Norfolk, particularly specialised solar PV professionals. Leakage factors are typically informed by commuting data. However, due to the specialised nature of large-scale renewable projects, such data is not reflective of the spatial distribution of jobs for such projects, as typically labour is sourced from across the country. There is currently uncertainty around estimating leakage for large-scale renewable energy projects. Reference to socio-economic assessments produced for other large-scale solar DCO projects (including Cottam, West Burton, and Heckington Fen) estimate between 50% to 75% leakage, noting that the size of the study area to which the leakage factor is applied varies considerably. The Applicant has taken a tiered approach of district, county and regional effects for the assessment of the net employment effects. The indicative spatial distribution of jobs is derived through reference to data on employment in the construction of utility projects sourced from BRES. The data shows that in 2024, there were 40 people employed in this sector in South Norfolk, a further 160 people in the rest of Norfolk, and a further 2,260 people in the rest of the East of England. The 40 people employed in this construction sector working in South Norfolk accounts for 6% of the gross direct number of workers supported by the construction of the Scheme (720 workers) and the 160 people from the rest of Norfolk accounts for 22% of the Scheme's gross direct workers. However, because it is unlikely that all current workers working in the sector of the construction of utility projects would be available to work on the Scheme, the proportion has been reduced to 50% (comparable to the displacement factor applied). This suggests that 3% of the construction workers of the Scheme would come from South Norfolk, 11% would come from the rest of Norfolk and 25% from the East of England, which reflects a leakage factor of between 50% and 70% from the regional and local level respectively. In total, the construction of the Scheme will support 1,044 net direct and indirect jobs. Of those, 29 are anticipated to be for people living in South Norfolk, 116 elsewhere in Norfolk, 261 in the rest of East of England, and 638 outside of the region.

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Socio-Economics	3.21 The Council expects the Applicant to provide early engagement on a draft Outline Skills, Supply Chain and Employment Plan (OSSCEP), including quantified targets and measurable commitments for local labour, SME procurement, and education or training contributions. SCC considers that a commitment to ongoing engagement and collaboration with SCC's Regional Skills Coordination Function in the relevant control document would be beneficial to the project in terms of maximising skills and employment initiatives through coordination with those of other NSIPs.	No	The Applicant has engaged with host local authorities (South Norfolk Council and Norfolk County Council) on the contents and commitments provided in the **OESSCS [EN0110014/APP/7.10]**. The importance of the interrelation between the supply chain strategy and the employment and skills strategy is recognised by the Applicant. Where feasible and appropriate, supply chain strategy and procurement processed will be utilised by the Applicant as a means of securing and implementing employment and skills initiatives. The Applicant welcomes further engagement with Suffolk County Council on the **OESSCS [EN0110014/APP/7.10]**.
Community Benefits	3.22 The Council expects a clear strategy for local economic benefit, including proposals for a Community Benefits Fund in line with SCC guidance, and for the Applicant to co-develop local investment priorities with community stakeholders.	Yes	The Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Information on the Community Benefit Fund and what this can contribute towards will be consulted upon with host local authorities, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefiting from the available funds. The Community Benefit Fund is separate from the DCO process and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it will not add favourable weight in the planning balance

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Transport and Access	3.24 The Council is concerned about the cumulative impacts of a number of NSIPs adjacent to the A140 being delivered concurrently, including Norwich to Tilbury and Ecopower Solar Farm.	Yes	**ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** assesses impact on transport and access utilising IEMA guidelines. The percentage impact on A140 south of B1134 from traffic associated with cumulative developments and Proposed Development traffic (as indicated by ATC 21 in Table 11.23 of **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**) is 8% for all vehicles, and 29% for HGVs. This percentage change sits below IEMA Guidance thresholds and is therefore not requiring further assessment. For the purpose of assessing a worst-case scenario, the cumulative assessment is based on all Scheme sites being active simultaneously during the construction phase, whereas in reality, construction activities will be staggered across the programme. A list of cumulative schemes was agreed with NCC, and is detailed in **ES Volume 3, Appendix 2.4 - Cumulative Schemes [EN0110014/APP/6.3.2.4]**.
Transport and Access	3.27 A number of NSIPs adjacent to the A140 between Norwich and Ipswich may be delivered concurrently, namely: i. Norwich to Tilbury (Transmission) ii. Ecopower Suffolk 3.28 SCC recognises that Norwich to Tilbury has been scoped into the list of projects considered when assessing cumulative impacts but reiterates the importance of assessing the cumulative and in-combination highways impacts, including those of AILs. 3.29 Ecopower Suffolk has undertaken non-statutory consultation in Spring 2025 and intends to submit its application in Autumn 2026. Therefore, it meets the requirement of being reasonably foreseeable as per the Norfolk Vanguard judgement.	No	A list of cumulative schemes was agreed with NCC. **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** has considered the impact of the Scheme on the LRN, including an assessment of cumulative effects in line with IEMA guidance. Traffic generated by cumulative schemes which are anticipated to route along the transport and access study area, including A140, is detailed in Section 11 of **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**. This includes estimates of construction vehicles and a full assessment of impact on the road network associated with traffic generated from Proposed Development plus from cumulative schemes. The Applicant acknowledges the Ecopower Suffolk scheme, however it is not clear at the current stage whether construction activities with the Scheme and Ecopower Suffolk will overlap. This will continue to be monitored as more information becomes available.

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	3.30 SCC expects developers to provide programmes and estimates of construction vehicles for study by stakeholders to allow informed comments regarding the scoping of documents such as the Transport Assessment.		
Transport and Access	3.31 The Council is aware of weight restrictions on bridges north of the site which may require large loads to be routed via the A140 to the south. 3.32 The Council is concerned about traffic impacts and weight restrictions for Abnormal Loads on the A1145, A12 and A146. The Council understands that weight restrictions on bridges north of the site may require large loads such as transformers to be routed via the A140 to the south. Whilst accepting there is a notification process (ESDAL) this is a reactive, case-by-case method which does not proactively assess AIL routes. 3.33 SCC recognises that the promoter will include assessments of AIL routes in the Environmental Statement. SCC expects these assessments to include robust investigations into proposed abnormal indivisible load (AIL) routes in order to identify any weight restrictions and, where necessary, identify appropriate measures to resolve these issues. There should be a commitment to early engagement with SCC well in advance of any AIL movements which affect the Suffolk highway network.	No	An assessment of AIL routes has been undertaken, involving liaising with National Highways. Outcomes have been reported in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11], ES Volume 3, Appendix 11.1 - Traffic Assessment [EN0110014/6.3.11.1]** and the **OCTMP [EN0110014/APP/7.6]**. Suitable management and mitigation measures have also been identified in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11] and** the **OCTMP [EN0110014/APP/7.6]**. All AIL movements will be managed by a specialist haulage contractor to ensure safety and compliance. Traffic management arrangements will be agreed in advance with NH, LHA and other relevant local highway authorities, structures' owners and the Police, where necessary, before any AIL movements take place. This is detailed in the **OCTMP [EN0110014/APP/7.6]**.
Transport and Access	3.34 The bridge on the A140 in Brockford requires overbridging to allow transformers to cross. Construction of the temporary bridge requires	Yes	The Applicant is aware of this issue and will be taken into consideration in the final routeing and decision-making process.

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	closure of the A140 for many hours, disrupting regional and local traffic. The latter typically does not follow approved diversion routes, causing disruption to communities adjacent to the A140. Frequent disruption to the A140 due to AIL movements associated with this and other NSIPs would, in the Council's view, necessitate investigation and repair of this and potentially other structures.		Final plans for routeing, including the use of the A140, will be secured through Articles and Requirements of the DCO including a Requirement to produce a CTMP confirming AIL routeing and management measures. An assessment of proposed AIL routes has been undertaken, and has been reported in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11],** alongside an AIL report detailed in **ES Volume 3, Appendix 11.1 - Traffic Assessment [EN0110014/APP/6.3.11.1]**. Suitable AIL management and mitigation measures have also been identified in the **OCTMP [EN0110014/APP/7.6]**.
Other Environmental Matters	4.1 As a neighbouring authority, SCC defers to Norfolk County Council as the responsible authority for minerals and waste matters.	Yes	The Applicant notes this comment and is engaging with Norfolk County Council as the minerals and waste planning authority.
General	4.4 There are several policies from the Babergh and Mid Suffolk Joint Local Plan relevant to the proposals, including: • Policy SP05 – Employment Land, which notes the Council's support for proposals for new employment development to provide skills and training packages which are supported by the relevant Local Planning Authority. This policy also notes the need for proposals to demonstrate adequate highway capacity. • Policy LP25 – Energy Sources, Storage and Distribution, which notes that the Council's support for renewable and low carbon, decentralised and community energy generating proposals will be subject to their impact on a range of factors, including highway safety,	No	The Scheme is located entirely within the jurisdiction of Norfolk County Council and South Norfolk District Council, and the principle of development is assessed primarily against the relevant National Policy Statements and the development plan of the host authority. The development plans of neighboring authorities do not form part of the statutory policy framework for the determination of the Application. Cumulative effects, including those arising from other existing and reasonably foreseeable developments within neighboring authority areas, have been identified and assessed throughout the **ES [EN0110014/APP/6.1]** in accordance with topic-specific methodologies. Where likely significant cumulative effects are identified, appropriate mitigation is proposed.

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	residential amenity, and the local community being considered and mitigated against, where appropriate. • Policy LP29 – Safe, Sustainable and Active Transport, which notes the importance of proposals demonstrating safe and suitable access for all and prioritising sustainable and active transport. Any significant impacts on highway safety or the function of the highway network must be mitigated. 4.6 There are also relevant policies within East Suffolk Council's Waveney Local Plan, including: • Policy WLP8.21 – Sustainable Transport, which notes that the cumulative impact of new development must not create severe impacts on the transport network, and proposals should include measures to promote travel using non-car modes. • Policy WLP8.27 – Renewable and Low Carbon Energy, which states that renewable and low carbon energy schemes must not create significant adverse impacts on the amenities of nearby properties/businesses, adverse safety impacts, or significant adverse effects on the transport network. This policy also notes the requirement for decommissioning and site restoration to its original condition at the end of the development's operational lifetime.		

1.17 Shotesham Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Reasonable Alternative and Design Evolution	In particular, we object to: i) The inclusion of Site 8 as a location for a solar farm	Yes	The Applicant notes this comment. The **Site Selection Assessment [EN0110014/APP/7.20]** explains the full approach undertaken to site selection and demonstrates that it is policy-compliant and robust. As set out in **Design Approach Document [EN0110014/APP/7.17],** Solar PV arrays were removed from the western part of Sub-Site 8B owing to the rising topography and visibility from a residential property on Market Lane. Solar PV Arrays have also been removed from Flood Zones 2 and 3 within the Sub-Site. Solar PV arrays have been removed from a field adjacent to Ringers Grove Ancient Woodland and owing to a discrete parcel of Grade 2 BMV quality.
Transport and Access	In particular, we object to: ii) The completely inadequate traffic management plan for Sites 7,8 and 9	Yes	The Applicant has prepared an **Outline Construction Traffic Management Plan [EN0110014/APP/7.6]** which includes management and mitigation measures including the use of internal haul routes through and between sites to lessen the impact of construction traffic, including Sites 7, 8 and 9.
Reasonable Alternatives and Design Evolution	The Parish Council has previously indicated it regarded Site 8 as unacceptable and inappropriate for solar power. We believe the sensitivity of this site is extremely high and that no amount of mitigation can be adequate, including the very limited mitigation now proposed in this consultation.	Yes	As set out in **Design Approach Document [EN0110014/APP/7.17],** Solar PV arrays were removed from the western part of Sub-Site 8B owing to the rising topography and visibility from a residential property on Market Lane. Solar PV Arrays have also been removed from Flood Zones 2 and 3 within the Sub-Site. Solar PV arrays have been removed from a field adjacent to Ringers Grove Ancient Woodland and owing to a discrete parcel of Grade 2 BMV quality.
Water Environment	East Pye is proposing to place several acres of solar panels on Site 8 which is situated on both sides of Shotesham Beck which is already subject to high levels of flood risk as shown in the Preliminary Environmental Impact Report (PEIR). The provisional Flood Risk Analysis (FRA) also shows that part of the site will be subject to a high risk of flooding. The PEIR also shows that the	No	All electrical infrastructure is located outside of areas of Flood Zones 2 and 3 (including eastern combined fluvial/surface water flow route) and outside of the 1 in 1000 (0.1%) annual probability plus allowance for climate change floodplain. Electrical infrastructure has been located within areas of lowest surface water flood risk as far as practicable.

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	flood risk will increase in future due to Climate Change.		More details are set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment [EN0110014/APP/6.3.9.1]**.
Water Environment	No flood mitigation appears to be proposed and the suggestion that there will be no incremental run off from the sloping site due to compacting during construction and from large solar panels appears unjustified.	No	Flood mitigation measures for the construction and decommissioning phases are set out in the **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]** and the **Outline Decommissioning Environmental Management Plan (ODEMP) [EN0110014/APP/7.3]**. The panels will be raised above the ground on narrow supports so they will not impede the flow of runoff across the fields. More details are set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment [EN0110014/APP/6.3.1.9]**.
Water Environment	Inadequate consideration has been given to the impact of flood risk on Market Lane and at Market Lane Farm – both locations are already subject to flash floods. The incremental flow will cause additional problems further down the River Tas at Falgate Farm and Brookfields in the centre of the village. Both properties are close to the Tas and are already at medium risk of flood; this risk is projected to increase to high over the next 15-20 years by the Environment Agency	Yes	As set out in **Design Approach Document [EN0110014/APP/7.17],** Solar PV arrays were removed from the western part of Sub-Site 8B owing to the rising topography and visibility from a residential property on Market Lane. Solar PV Arrays have also been removed from Flood Zones 2 and 3 within the Sub-Site. Solar PV arrays have been removed from a field adjacent to Ringers Grove Ancient Woodland and owing to a discrete parcel of Grade 2 BMV quality. The Solar PV Arrays within Sub-Sites 8A and 8B are located outside the floodplain of the River Tas tributary (Shotesham Beck) and are raised at a suitable freeboard above the ground so they will not impede the flow of runoff across the fields. The Solar PV fields will have a grass cover which will promote soil stability and increase ground roughness/slow the flow of runoff across the fields. More details are set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment [EN0110014/APP/6.3.9.1]**.
Water Environment	Under paragraph 170 of the National Planning Policy Framework (NPPF), development should be directed away from areas at the highest risk of flooding (now or in future). Given the number of more appropriate solar farm sites being identified by East Pye and other developers	Yes	All electrical infrastructure is located outside of areas of Flood Zones 2 and 3 (including eastern combined fluvial/surface water flow route) and outside of the 1 in 1000 (0.1%) annual probability plus allowance for climate change floodplain. Electrical infrastructure has been located within areas of lowest surface water flood risk as far as practicable in accordance with the sequential approach.

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	in Norfolk, it is clear that the use of Site 8 for solar is inconsistent with NPPF paragraph 170.		Some Solar PV Arrays are located within areas of higher surface water flood risk, however they are set at a suitable freeboard above the ground so as not to impede surface water flows and to be flood resilient. More details are set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment [EN0110014/APP/6.3.9.1]**.
Reasonable Alternatives and Design Evolution	At least 13 households close to Site 8 rely on boreholes for their water supply. There are material concerns about pollution risk to water supply arising from the commissioning, operation and decommissioning of the site which have not been addressed in the Statutory Consultation.	Yes	**ES Volume 3, Appendix 16.1 – Ground Condition Assessment [EN0110014/APP/6.3.16.1]** has been updated to identify additional private water supplies. The study area for identification of private water supplies has been set at 1km from any structure which could require deep piled foundations (i.e., the 132kV and 400kV substations). For all areas where deep piled foundations will not be utilised, e.g., PV arrays and cable trenching, a 250m study area has been used for identification of private water supplies.
Landscape and Visual	The NPPF expects developments to recognise the intrinsic character and beauty of the countryside and to conserve and enhance the natural landscape. Site 8 and its surrounding area is part of the highly valued landscape of Shotesham and Shotesham Beck, much loved by residents and non-residents alike. The gently sloping nature of the site is visible from Brooke Road, Baxters Lane, Market Lane and Wash Lane and from the network of PRoW that criss-cross the area. Site 8 sits across South Norfolk Landscape Character Areas A1(Tas Rural River Valley) and B1 (Tas Tributary Farmland) and is a fine unspoilt example of many of the important characteristics of these areas. The open valley side, the pastoral flat valley floor, narrow lanes and seasonal ford with scattered woodland all providing framed views of the countryside explain just why this landscape is so valued. Placing solar panels in	Yes	Solar PV arrays which could not be effectively mitigated are removed from Sub-Site 8B. Further details are presented in **ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1]**. As set out in **Design Approach Document [EN0110014/APP/7.17],** Solar PV arrays were removed from the western part of Sub-Site 8B owing to the rising topography and visibility from a residential property on Market Lane. Solar PV Arrays have also been removed from Flood Zones 2 and 3 within the Sub-Site. Solar PV arrays have been removed from a field adjacent to Ringers Grove Ancient Woodland and owing to a discrete parcel of Grade 2 BMV quality.

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	this area will fundamentally alter the valued characteristics of this area.		
Landscape and Visual	South Norfolk Council is currently consulting on a draft Supplementary Planning Document entitled Landscape susceptibility in relation to energy generation, storage and transmission (Draft SPD). This shows that the susceptibility of the landscape to large solar developments is high, meaning that the area has low potential for the solar development proposed.	No	The Draft SPD has been reviewed as part of the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 7 – Landscape and Visual [EN010168/APP/6.1.7]** and landscape susceptibility has been adjusted to reflect findings of the SPD. However, the SPD cannot be directly applied onto DCO projects or this Scheme due to differences in methodology.
Landscape and Visual	It should be noted that the Draft SPD assumes smaller solar panels in place for 25 years. The landscape impact of the East Pye proposal, with its taller panels in place for 60 years, would be even more detrimental that indicated by the draft SPD.	No	It is noted that the SPD has been written based on different parameters. However, the SPD cannot be directly applied to DCO projects or this Scheme due to differences in methodology. Details are presented in **ES Volume 1, Chapter 7 – Landscape and Visual [EN010168/APP/6.1.7]**.
Landscape and Visual	East Pye's own landscape assessment highlights the high value and sensitivity of Site 8 and the significant detriment that solar panels will cause in this area. This is despite the landscape sensitivity analysis being carried out without discussion with the village and excluding one of the most popular locations for enjoying this special location (Grid Reference 25930 97530 – the field boundary part way along Shotesham FP 22).	Yes	Landscape mitigation along Shotesham FP22 is proposed to reduce the potential visual impact of the Scheme. A permissive path is also proposed within Sub-Site 8B to improve the enjoyment of the landscape. Details of landscape mitigation are included in **the Outline Landscape and Ecological Management Plan (OLEMP) Appendix 2, Figure 2 - Green Infrastructure Strategy [EN0110014/APP/7.4]**.
Landscape and Visual	The proposed use of Site 8 runs completely contrary to the advice in the draft SPD: " • *Locate development on lower slopes/within folds in gently undulating lowland landscapes or on flat plateau sites, rather than on slopes, especially higher slopes, crests and plateau edges.* • *Site solar development in landscapes with a sense of enclosure (e.g. provided by woodland or high hedges) rather than in open and unenclosed*	Yes	Solar PV arrays within unsuitable locations are removed from Sub-Site 8B. Details of landscape mitigation are included in O**LEMP Appendix 2, Figure 2 - Green Infrastructure Strategy [EN0110014/APP/7.4]**. SPD has been written based on parameters different to East Pye Solar. The SPD cannot be directly applied to DCO projects or this Scheme due to differences in methodology and parameters.

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	landscapes (unless on an elevated plateau lacking intervisibility with surrounding landscapes)."		
Landscape and Visual	Site 8 will be visible from several neighbouring properties, most obviously Market Lane Farm which appears to be within 50m of the proposed panels. The sloping nature of Site 8 will heighten the permanent visual impact for neighbours whether living in the valley floor along Market Lane and Wash Lane or along Brooke Road and Baxter's Lane along the top of the valley. Noise from the movement of the tilting of the panels will be a further negative impact for those living closest in this most tranquil of neighbourhoods.	Yes	Solar PV Panels proposed close to Market Lane Farm have been removed from the Scheme. Details of the Scheme are presented in **ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1]**.
Landscape and Visual	Walkers, cyclists and horse riders are drawn to the area around Site 8 due to its beauty, tranquillity. and accessibility. The solar proposal, even with normal levels of mitigation, will fundamentally change the area for the worse and discourage recreation in one of the few natural spaces close to Norwich. The village of Shotesham, with its street parking and car parks at All Saints and St Mary's Church welcomes many visitors who enjoy its history, nature and quiet undulating character. The village has published two books of walks, many featuring Site 8. The impact of this proposal on the amenity value of those outside the immediate area is almost impossible to measure but is clearly negative and another reason why this site is inappropriate for solar development.	Yes	The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 7 - Landscape and Visual [EN011014/APP/6.1.7]**. The scale of development within the red line boundary has significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) as part of the iterative design process, in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. The LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. Specific mitigation measures and enhancement plans are included in the relevant ES chapter. The **OLEMP [EN0110014/7.4]** provides details of the proposed mitigation and enhancement. The design will incorporate minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland and hedgerows, public rights of way and watercourses.
Transport and Access	The Transport and Access sections of the PEIR show that access to Sites 7,8 and 9 would be via Fairstead Lane (Unclassified) from the A140 and via Shotesham Road (C371)/B1527 and	Yes	The access strategy is set out in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**. **ES Volume 2, Figure 11.2 to Figure 11.8 EN0110014/APP/6.2.11.2-11.8],** shows the Likely and Suitable Routes to the Scheme together with the Transport **ES Volume 2, Appendix 11.1 –**

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	via Littlebeck Lane from the B1132 and then using the local lane network as far as possible including more unclassified roads.		**Transport Assessment [EN0110014/APP/6.3.11.1] and the Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6].** The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. NCC has advised that the strategy is adjusted to use The Krons, in preference to Fairstead Lane (between A140 and site 7a access). The strategy uses A140, B1527 and B1332 as the feeder corridors for construction traffic to minimise the use of other local roads except for the final connection to the land parcels. Where feasible, the strategy uses internal haul routes, to further reduce the use of the existing local road network. That strategy avoids movements through communities, such as Saxlingham Nethergate and Hempnall.
Transport and Access	In contrast, the scoping documents for the PEIR assumed no use of the local lane network other than to exit/leave the B1132 and A140. Instead, internal haul roads were proposed through the sites and the cable corridor.	Yes	The access strategy is set out in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**. **ES Volume 2, Figure 11.2 to Figure 11.8 EN0110014/APP/6.2.11.2-11.8],** shows the Likely and Suitable Routes to the Scheme together with the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1] and the Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6].** The strategy uses A140, B1527 and B1332 as the feeder corridors for construction traffic to minimise the use of other local roads except for the final connection to the land parcels. Where feasible, the strategy uses internal haul routes, to further reduce the use of the existing local road network.
Transport and Access	The PEIR proposals appear to have been developed without sufficient regards to the limitations of the A140, the B1132 and the local lane network. In particular neither Fairstead Lane or Littlebeck Lane have the width to cope with significant additional 2-way traffic flows; there is not the width for 2-way traffic and few adequate passing spaces. The lanes are used by travellers on foot, cycle and horseback as well as by delivery drivers, local residents and agricultural traffic. The proposals will lead to danger, harm to	Yes	**ES Volume 1 Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** and the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** set out the assessment of effects of transport and access on the road network during the construction and operational periods. Those assessments indicate the reasonable worst-case scenario forecast for the construction and operation of the Scheme. It is shown that effects on the road network will be Negligible or Minor Adverse and are therefore deemed to be Not Significant, when judged against the IEMA Guidelines Rule 1 and Rule 2.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	the hedges and hedgerows and material disruption to normal traffic flows, including the regular use of the lane network by very large agricultural equipment.		
Transport and Access	The sub-station in the middle of Site 7 appears to have no obvious point of access for emergency services in the event of a substation fire. Again, local lanes will not be adequate for the emergency services.	No	Where practicable, existing field accesses will be utilised to minimise the impact on vegetation. As detailed in the **Outline Operational Traffic Management Plan [EN0110014/APP/7.7],** appropriate widening and formalisation will be undertaken, where necessary. Access for Sub-Sites and access tracks within the Sites will be retained post-construction phase to be utilised for the operational phase. Some, or all, accesses will be utilised for the decommissioning phase. Broaden Lane (A42) is the proposed access route for Sub-Site 7F, which contains the 132kV Project Substation. This is an existing route and will be used for Highway Access during Construction and Operation. This access will allow for necessary operational and maintenance vehicles and for emergency services vehicles. Those vehicles would use the adjoining road network in accordance with existing traffic.
Transport and Access	A separate direct access to the proposed East Pye sites from the A140 and B1132 is required to allow proper management of the traffic volumes associated with this scheme.	No	The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. NCC has advised that the strategy is adjusted to use The Krons, in preference to Fairstead Lane (between A140 and Sub-Site 7A access). The strategy uses A140, B1527 and B1332 as the feeder corridors for construction traffic to minimise the use of other local roads except for the final connection to the land parcels. This is shown in **ES Volume 2, Figures 11.2 - 11.8 Likely and Suitable Routes to the Scheme [EN0110014/APP/6.2.11.2-11.8] and** is detailed further in the **OCTMP [EN0110014/APP/7.6].**
Transport and Access	Other NSIPs such as the National Grid Upgrade, the Orsted Hornsea 3 development and the proposed Norwich Tilbury project have all successfully made extensive use of internal haul roads to minimise the impact on narrow local	Yes	There are several proposed internal haul routes to connect Site 7 and Site 8 that will be temporary for construction vehicles. These are shown in **ES Volume 2, Figure 11.2 - 11.8 Likely and Suitable Routes to the Scheme [EN0110014/APP/6.2.11.2 - 11.8]**.

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	transport routes. The same approach is required in this area. This was the original proposition in the PEIR scoping document.		There are three proposed internal haul routes to connect to the Sites. These are described in Table 5.1 of the **OCTMP [EN0110014/APP/7.6]** and will be utilised to connect Sub-Sites 7A-7F including using CRC11 and CRC12, Sub-Sites 7G-L and Sub-Sites 8A-8B. The Hornsea 3 and Norwich to Tilbury electricity transmission projects are long distance linear projects which are suited to internalised haul routes along the project trace.

1.18 Woodton Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
EIA Methodology	We consider that the Phase Two consultation study and the details provided are inadequate.	No	Environmental information presented during the statutory phase of the Scheme consultation process (Phase Two) was provided with adequate and proportionate input from various EIA teams. This process was communicated as being iterative and subject to being updated as the Scheme progresses, as is standard for Schemes undergoing a DCO application. The statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the PA2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant's Phase Two consultation (which was statutory under section 47 of the PA2008) was carried out in line with the commitments and principles established in the Applicant's published Statement of Community Consultation (SoCC), provided in **Consultation Report, Appendix 5 - Statement of Community Consultation Materials [EN0110014/APP/5.6]**. As required by s47 of the PA2008, the Applicant consulted with South Norfolk Council and Norfolk County Council on a draft of the SoCC and had due regard

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			to their comments in updating the SoCC for publication ahead of commencing statutory consultation. Chapter 6 (Preparation for Statutory Section 47 Consultation) of the **Consultation Report [EN0110014/APP/5.1]** describes the process of preparing the SoCC, including the Applicant's consideration of comments received by South Norfolk Council and Norfolk County Council (Table 6-1, Table 6-2 and Table 6-3) and adherence to commitments made in the published SoCC (Table 6-5). The Applicant is firmly of the belief that the PEIR published for the purposes of the Phase Two Consultation was adequate and detailed in its presentation of environmental assessments. The **ES [EN0110014/APP/6.1]** presents updated EIA findings.
EIA Methodology	East Pye Solar has not taken into consideration fully the risks and mitigation needed for a project of this size.	No	The Scheme has sought to provide comprehensive mitigation, this is detailed in each chapter of the **ES [EN0110014/APP/6.1]**. Any mitigation strategy presented within the PEIR was subject to be updated and detailed further in the ES. The mitigation measures identified in the ES are embedded within the project's management and control documents (including, where relevant, the Construction Environmental Management Plan, Landscape and Ecological Management Plan and other certified plans). These documents are secured through Requirements within the **draft DCO [EN0110014/APP/3.1]**. Accordingly, the mitigation is not merely proposed but will be legally secured and enforceable. Compliance with the Requirements will be mandatory, and any breach of a Requirement would constitute a breach of the DCO and may amount to a criminal offence.
Cultural Heritage	Insufficient consideration for the Heritage properties within the catchment of Woodton.	No	Heritage properties within the catchment of Woodton have been considered as part of the EIA process and specifically addressed in **ES Volume 3, Appendix 10.1 Heritage Assessment [EN0110014/APP/6.3.10.1]**.
Water Environment	Flood risk assessment does not take into account the recent flooding events in the village.	Yes	Historic flooding is included in the assessment in ES Volume 3, Appendix 9.1 Flood Risk Assessment [EN0110014/APP/6.3.9.1]. Appropriate mitigation has been incorporated into the Scheme so that flood risk is not increased elsewhere.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Water Environment	Concern over the water supply to the project as Anglian Water has said it will not supply the development.	Yes	Tankering is going to supply water to the Site. This is addressed in **ES Volume 3, Appendix 9.3 Water Resources Assessment [EN0110014/APP/6.3.9.3]**. The specific nature of water tankering will evolve and be confirmed by the Applicant at a later date after further engagement with tankering companies.
Transport and Access	Vehicle access on narrow lanes surrounding Woodton and other South Norfolk villages.	Yes	The **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** has considered construction vehicle routeing and access proposals, alongside identifying appropriate management and mitigation measures in the **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]**. Vehicle routing proposals and measures have been developed in consultation with NCC. Changes in traffic volumes and significance of effects have been assessed in line with IEMA guidance thresholds.
Construction and Decommissioning	Very great concern about the location of Construction Compounds which are currently sited to the East of B1332 (site 10C) and on the Shotesham Road (site 7L) which would both have a major impact on transport links for residents of Woodton for the duration of the construction phase.	Yes	Several chapters included in ES Volume 1 assess the likely significant effects arising during construction of the Scheme and identify appropriate mitigation where required. Landscape screening and development setbacks are proposed to minimise potential visual effects. This is outlined in the **Design Principles, Parameters, and Commitments** document **[EN0110014/APP/7.18]**. Construction effects are likely to be temporary in nature. **ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4]** provides details on what can be expected of the temporary construction compounds. Temporary construction compounds would be established in locations presented in **ES Volume 2, Figure 4.2 Indicative Temporary Construction Compound Locations [EN0110014/APP/6.2.4.2]**. The temporary construction compounds would comprise: • Areas of hardstanding; • Car parking; • Site and welfare offices and workshops;

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			• Security infrastructure, including cameras, perimeter fencing and lighting; • Area to store materials and equipment; • Site drainage and waste management infrastructure (including sewerage); and • Electricity, water, waste water and telecommunications connections.
Transport and Access	There will also be a cable corridor compound sited next to the Hempnall Road (opposite CRC8/6). This means that potentially all three routes from Woodton to the north will be blighted for many months - you state that times of operation will be 7am to 6pm.	Yes	**ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** has considered construction vehicle routeing and access proposals, alongside identifying appropriate management and mitigation measures in the **OCTMP [EN0110014/APP/7.6]**. This includes a commitment that construction deliveries and collections by HGV will be scheduled to arrive and depart between 09.30 and 16.30 to avoid peak traffic periods. Vehicle routeing proposals and measures have been developed in consultation with NCC. Changes in traffic volumes and significance of effects has been assessed in line with IEMA guidance thresholds.
Landscape and Visual	Impact on the landscape of South Norfolk for environmental reasons and quality of life.	No	The Applicant notes this and respectfully disagrees. The LVIA presented in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7]** recognises that there will be long term changes to the character of parts of the landscape and on some people's views of the landscape for the duration of the operation of the Scheme. This is consistent with paragraph 5.10.5 of the Overarching National Policy Statement for Energy (NPS EN-1), which states that *"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."* The Applicant has continued to develop the design presented in the application for development consent, to seek opportunities to further reduce effects on the local landscape. The scale of development within the red line boundary has significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) as part of the iterative design process, in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			and mitigate adverse effects. The **OLEMP [EN0110014/7.4]** provides details of the proposed mitigation and enhancement. The design will incorporate minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland and hedgerows, public rights of way and watercourses.
Soils and Agriculture	Loss of good Agricultural land in south Norfolk. The mitigation offered is insignificant in comparison to the size of the project.	No	The areas of each ALC grade affected by the Scheme are set out in the **ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.1.15]**. Agricultural land loss has been minimised so far as possible, This Chapter considers the loss to infrastructure, which is a small proportion of the Order Limits, and considers the land use changes and implications. The effects on the local economy and on food production from the Scheme and cumulatively with other proposals are set out in Chapter 15. **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5]** sets out the methodology for site selection, including brownfield sites, and alternative layouts, as well as for alternative cable route corridors, alternative sites for the BESS and alternative construction compounds in addition to alternative technologies. The Applicant has considered ALC grade in its site selection for the Scheme, seeking to avoid BMV land when assessing appropriate sites, as much as practicable.
Scheme Description	Projects have a usual lifespan of 25 years but this one is stated as 40-60 years before Agricultural land and habitats are to be restored.	No	The Applicant is seeking a time limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 21 of the Development Consent Order (DCO). It is therefore the intention to restore agricultural land and habitats. This is detailed in the Outline Decommissioning Environmental Management Plan (ODEMP) [EN0110014/APP/7.3].
BESS	Risk factors associated with the BESS installations.	No	The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which assess short-term air quality impacts on sensitive receptors. The Plume Assessment Study in Appendix B of the **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]** assesses the battery fire

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			emission impacts to air quality at six worst case fire locations (using the illustrative BESS design) on sensitive receptors within a 1km radius of the BESS area. Typically, a BESS fire would be a relatively short-term incident. The Plume Study therefore compared predicted concentrations against Acute Exposure Guidance Levels (AEGLs) and Emergency Response Planning Guidelines (ERPGs) which are relevant to short term releases, in addition to National Air Quality Objectives (NAQOs). The Plume Study demonstrated that there were no significant impacts on any sensitive residential receptor location with 1km of the BESS compound. A risk assessment of the potential impact on visibility has also been undertaken for nearby road and rail receptors. The predicted visibility distances in the event of a BESS fire are greater than safe stopping distances for roads and rail. An **OBSMP [EN0110014/APP/7.5]** has been prepared for the Scheme, using the guidance provided by Norfolk Fire and Rescue Service and fully incorporating the recommendations of the National Fire Chiefs Council (NFCC), to ensure that any risks relating to batteries are properly mitigated. Section 5.1.1 of the **OBSMP [EN0110014/APP/7.5]** confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. Section 4 of the **OBSMP [EN0110014/APP/7.5]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The implementation of the **OBSMP [EN0110014/APP/7.5]** is secured through a Requirement in Schedule 2 of the **draft DCO [EN0110014/APP/3.1].** This stipulates that a detailed Battery Safety Management Plan (BSMP) is to

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			be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency (EA) prior to the commencement of the works for the BESS. The BMSP will be substantially in accordance with the **OBSMP [EN0110014/APP/7.5]**.
Construction and Decommissioning	Concern that East Pye may sell on the development to other investors/developers once planning is agreed which would mean no empathy with local communities in the future.	No	The Applicant confirms that, if consent is granted, they have the capability to build, own, and operate the Scheme. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker is defined in the Development Consent Order (DCO) and will remain bound by the legally enforceable requirements of the DCO (d**raft DCO [EN0110014/APP/3.1]**). The DCO contains mechanisms that govern the transfer of the undertaker's obligations in the event that the Scheme was sold (Article 37 (Consent to transfer the benefit of the Order)). As such, any future undertaker would be bound by the same commitments contained within the management plans / DCO Requirements - breach of which would be a criminal offence.
Consultation and Engagement	As the preliminary environmental report stands, we do not think that it meets the standards of adequacy required for nationally significant infrastructure projects in terms of key environmental, safety, and local impact. The information presented is not sufficient to inform the public and statutory consultees. For this reason Woodton Parish Council strongly objects to the East Pye proposal at the Statutory Consultation stage. We would ask that the applicant should be required to revise and resubmit the Preliminary Environmental Report to include full baseline survey data, cumulative impact assessments and detailed land and risk management plans.	No	The Applicant considers that the PEIR has been robust, thorough, and undertaken in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations 2017. The EIA is an ongoing process. The ES has had regard to comments received through the statutory consultation and targeted consultation, to inform the design of the Scheme, where possible. The findings of the EIA are presented in the ES chapters, and a summary of the main design changes to the Scheme can be found in **ES Volume 1, Chapter 4 – Alternatives and Design Evolution [EN0110014/APP.6.1.4]**. The ES was undertaken in accordance with the EIA Regulations and was based upon the Scoping Opinion. On this basis, a revised PEIR would not be appropriate – the ES provides more detail.

1.19 Anglian Water

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Consultation and engagement	It is noted that the PEIR references the meetings the Applicant has held to date including an introductory meeting with Anglian Water [1.8.8] following our representation on the scoping consultation. Anglian Water would welcome further engagement with the Applicant to discuss the matters raised in our response	No	The Applicant welcomes further engagement with Anglian Water to discuss the matters raised in its statutory consultation response. The Applicant met with Anglian Water in April 2025 to discuss the response to the Scoping Report and the upcoming statutory consultation. The Applicant will continue to liaise with Anglian Water after this DCO submission.
Scheme description	Cable Trenching: The range and type of cable trenching is noted in the PEIR [5.1.7, 5.2.41 and 5.2.63]. Anglian Water would welcome further clarification and discussion around the method of trenching and voltage of the cables in terms of heat dispersion from the cables, and method of trenching employed at interfaces with our assets. Whilst 5.1.8 states that appropriate setbacks and buffers will be included, as far as possible, some crossing of our assets will be inevitable, and the appropriate measures undertaken	No	**ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]** outlines the method of trenching and voltage of cables for the Cable Route Corridor (CRC). The construction working width of the CRC will be 25m wide and will narrow at hedgerow crossings. The voltage of the cables and the number of circuits will affect the width and number of cable trenches required. The width and spacing of the cable trenches will depend on environmental constraints, engineering requirements, and cross third-party apparatus. The cable route will need to cross a range of existing infrastructure such as roads and tracks, PRoWs, existing buried/underground utilities and watercourses. As detailed in **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]**, open cut trenching will be primarily utilised for crossings. The open cut technique may require the temporary closure of PRoWs, minor roads and tracks. In terms of installation, the cables will be laid directly into the trenches, or ducting will be laid, and the cables pulled through the ducting. There will be no need to trenchless crossing for the underground cabling at some locations within the Site, for example, to cross beneath existing buried utilities and watercourses. Trenchless crossings could be undertaken, for example, using the HDD method. These are set out in the **Outline Cable Route Construction Statement [EN0110014/APP/7.21]**. The Applicant has included protective provisions for the benefit of Anglian Water in its draft DCO and will liaise with Anglian water to seek to agree the form of those protective provisions.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Scheme layout	There are a number of factors in terms of depth and size of our asset, operating pressure of water mains, pipeline material, potential impacts from heave pressures etc to be aware of when considering such crossings. We would advise that further technical and design assurance is undertaken to ensure the appropriate mitigation/best practice measures are identified in the outline Construction Environment Management Plan (oCEMP).	No	Since statutory consultation, further technical and design assurance has been undertaken by the Applicant to ensure the appropriate mitigation and best practice measures. This can be found in the O**CEMP [EN0110014/APP/7.2]**.
BESS	Battery Energy Storage System (BESS): It is noted that the PEIR states that the BESS will comply with any relevant fire protection guidelines at the time of detailed design. Anglian Water advise that any water resources required for fire suppression are identified and a pre-planning enquiry submitted to our Inflow platform to assess the connection requirements (see our response below on the Water Environment – Chapter 9).	No	An **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]** has been submitted, which includes measures regarding the design of the BESS to reduce the risk of fire and manage any potential fire events, section 4 of the OBSMP covers all requisite firefighting requirements for the Scheme. The OBSMP stipulates: • The firefighting water requirement will be fully assessed at the detailed design stage based upon based upon analysis of LSFT of the BESS design, plus any additional fire and explosion test data provided by an independent Fire Protection Engineer;. • Water storage volumes will be fully agreed with NFRS. The BESS area will contain a minimum of two firefighting water storage units tanks of no less than 230,000 litres in capacity, capable of delivering 1,900 litres per minute for 4 hours (exceeding NFCC guidance); • If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures, a dedicated water supply from separate water tanks and separate containment arrangement will be provided. Runoff from internal suppression systems has the potential to contain elevated pollutant concentrations and will therefore be managed independently of the external surface water system. Backflow prevention measures, including check valves or equivalent devices, will be incorporated to prevent contamination of potable water supplies in accordance with relevant regulations.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			This oBSMP is secured under the DCO Requirements, a breach of which would constitute a criminal offence.
Water environment	The PEIR correctly identifies that the Project is within the Norfolk Norwich & the Broads WRZ, and Norfolk Harleston WRZ; both of which are currently in deficit under the baseline scenario [9.4.16]. Our WRZ summaries explain that the baseline supply demand balance for these WRZs are expected to go into deficit by 2025 under Dry Year Annual Average conditions. The summaries explain how demand management options and supply options will bring the WRZs into balance. It is noted that the PEIR identifies that the embedded mitigation measures will mean any effects on the supply demand balance will be of low magnitude and minor – based on the current understanding of climate change and future water demand.	Yes	The Construction and Decommissioning Phases of the Scheme are considered to be those with the higher water demand, due to the East Anglia region being classified as “seriously water stressed”. Both private and public water supplies could be at risk of a reduction in water quality or quantity, particularly during summer or drought events. With the inclusion of the embedded mitigation described in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**, the potential construction effects identified on the Water Resource Zones (High and Medium sensitivity) are considered to be of a Low magnitude of impact and are assessed as Minor. The operational phase of the Scheme has a lower water demand. With the inclusion of the embedded mitigation measures described in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]** the effects in EIA terms are not significant, based on current understanding of climate change and future water demand in the region.
Water environment	In addition, we agree that the operational phase of the Project will have a lower water demand, but a minor risk may still arise on impacts to public water supply. Anglian Water’s current position on new unplanned non-domestic water requests is to decline requests that exceed 20m3/day. Our non-domestic water requests position statement can be found here. It is noted that the demand for water during construction, is outlined in Appendix 9.3. We would encourage the Applicant to use our pre-planning enquiry service through our InFlow platform to ensure the Project's water supply requirements can be appropriately addressed, and whether network reinforcement is needed to provide any domestic water requirements at the substations, and fire-suppression water storage	Yes	The operational phase of the Scheme has a lower water demand. With the inclusion of the embedded mitigation measures described in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]** the effects in EIA terms are not significant, based on current understanding of climate change and future water demand in the region. Network reinforcement is therefore not required

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	infrastructure for the BESS. Further commentary on the water resource assessment scoping in Appendix 9.3 is provided below.		
Water environment	There is no reference to how wastewater flows through the Project phases will be managed - regarding the storage method for wastewater prior to disposal, the number of staff likely to be onsite during each Phase and the frequency of visits. Anglian Water would encourage pre-planning engagement regarding any temporary or permanent connections to our wastewater network.	Yes	The Applicant proposes wastewater to be stored on-site, with any wastewater generated from welfare facilities to be removed by tanker to an approved wastewater and sewage treatment centre. During the operational phase of the Scheme, this is likely to consist of a septic tank arrangement at a single onsite welfare facility. As such, no permanent connection to the wastewater network is proposed. Detail of wastewater handling is to be set out in the Site Waste Management Plan, which has been committed to through the o**CEMP [EN0110014/APP/7.1]** which is secured by requirement in Schedule 2 to the **Draft DCO [EN0110014/APP/3.1]**.
Water environment	5.5 Sewer flooding: The sewer records identified through the utilities search demonstrate that there are a limited number of sewer assets within the proposed Project boundary. Whilst the risk of sewer flooding is low, surface water flooding can have a detrimental impact on our sewers that might lead to a sewer flooding event as a result of infiltration. The FRA should ensure that any increase in surface water flood risk identified by the Project construction or operation, including alteration of flow routes, does not have a detrimental impact on our sewer network.	Yes	**ES Volume 3, Appendix 9.1 - Flood Risk Assessment (FRA) [EN0110014/APP/6.3.9.1]** specifies mitigation for surface water management for the BESS, Substations and standalone inverter units. Construction and decommissioning surface water management is outlined in the **oCEMP [EN0110014/APP/7.1]** and **oDEMP [EN0110014/APP/7.3]**.
Water environment	8. Outline Surface Water Drainage Strategy (oSWDS): It is noted that the design of the Project is continuing to evolve with no fixed location for the substations and BESS, and these will be considered in further detail in the ES. We agree that the drainage hierarchy should be adhered to, and the use of SuDS infiltration for the substations would be supported. As a result of the FRA and oSWDS, it is not anticipated that any connection to a surface water sewer will be proposed by the project due to its rural location and limited	No	The potential for rainwater re-use will be considered at the detailed design as mentioned in **ES Volume 3, Appendix 9.3 - Water Resources Assessment [EN0110014/APP/6.3.9.3]**. The Solar PV Arrays are raised above the ground with the natural ground cover beneath retained and as such runoff would drip off the Arrays and percolate naturally into the soil as per the existing regime. BESS and Substation drainage will be lined for pollution management with a controlled discharge to watercourse.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	proximity to our surface water sewer network, but we would seek confirmation through the updated FRA and DS for the DCO application. The updated FRA and DS should also demonstrate how any SuDS attenuation schemes or rainwater harvesting and reuse would link to reducing demands for water resources – particularly potable water – and signpost to the Water Resources Assessment, which identifies these measures.		Standalone inverter units/welfare cabins will have an aggregate filter drain or surface with underlying sub-base, with natural percolation into the ground. An overflow outlet will be included as required. As such, no connections to AW assets are proposed as confirmed in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Drainage Strategy Report [EN0110014/APP/6.3.9.1]**.
Water environment	Anglian Water welcomes the Water Resource Assessment Scoping in Appendix 9.3, which accompanies PEIR Chapter 9 - Water Environment, and pleased to note that our Water Resources Management Plan and Drought Plan have been reviewed to inform this assessment.	No	The Applicant welcomes this comment.
Water environment	As previously explained to the Applicant, Anglian Water's Non-Domestic Water position statement sets out that where there are new and unplanned non domestic requests are received, which exceed 20,000 litres per day (0.020 Ml/d or 20m3/day) (this may be less, dependent on the availability of water in that area) Anglian Water will need to decline the request for more water, in order to protect existing supplies and the environment. For NSIPs, where requirements exceed 20m3/day a water resources assessment (WRA) will need to be submitted for Anglian Water to consider on a case-by-case basis whether there will be sufficient water resource available.	No	The Applicant has taken this into account when assessing the options of water supply for the site in an options appraisal within **ES Volume 3, Appendix 9.3 - Water Resources Assessment [EN0110014/APP/6.3.9.3].** Tankering was concluded as the main option for water supply to the site.
Water environment	The approach set out in Appendix 9.3 demonstrates the Applicant's intention to manage the supply/demand balance and develop embedded mitigation measures to ensure overall water demand is not increased in the area. Section 2.5 Embedded Mitigation sets out the	No	The Applicant has continued to include water neutrality options e.g. rainwater harvesting to reduce water demand where possible. This is covered in **ES Volume 3, Appendix 9.3 - Water Resources Assessment [EN0110014/APP/6.3.9.3]**.

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	approach to reach water neutrality through various off-setting measures including rainwater harvesting and reuse, and measures to reduce demand wherever possible.		
Water environment	Anglian Water supports the approach set out in Appendix 9.3 and how the WRA will be further developed for submission with the Environmental Statement (ES) - this should include the breakdown of water used for domestic purposes (sanitation etc), fire suppression, and nondomestic purposes (separating out non-potable and potable requirements).	No	The Applicant welcomes this comment. A breakdown of the water used has been included in the **ES Volume 3, Appendix 9.3 - Water Resources Assessment [EN0110014/APP/6.3.9.3]**.
Water environment	As identified in para 3.1.3, the Applicant is encouraged to complete and submit the WRA form to Anglian Water if the non-domestic water requirements will exceed 20m3/day for potable water -even if this is on a temporary basis during construction. The outcome of Anglian Water's consideration of the WRA submission would then inform the ES or whether any specific requirements are needed in the draft DCO to manage water resources once the Project moves into delivery.	No	The Applicant welcomes this comment and has taken this into consideration when assessing the options of water supply for the site outlined in the **ES Volume 3, Appendix 9.3 - Water Resources Assessment [EN0110014/APP/6.3.9.3]**.
Water environment	The water demands through the three stages of the Project (construction, operation and decommissioning) appear to be very high - with over 41 Ml/d (megalitres per day) quoted for construction and decommissioning [2.3.6]. Even if potable water makes up 20% of this demand, there would still be a need for 8.3 Ml/d during construction - 8,300,000 litres a day or 8,300 m3/day which significantly exceeds our current non-domestic water position of 20m3/day. Anglian Water suggests that these amounts or rates are reviewed for accuracy.	No	The Applicant has reviewed and refined these values. This is outlined in the **ES Volume 3, Appendix 9.3 - Water Resources Assessment [EN0110014/APP/6.3.9.3]**.

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Other Environmental Matters	The references and responses to Anglian Water's comments on the Scoping Consultation with regard to ground conditions and our assets [listed in Table 16.2] are welcomed. The Utilities Plan in Figure 18.1 shows the various utilities interfacing with the Project area, and further reference to this is provided in relation to other environmental matters in.	No	This is noted by the Applicant.
Other Environmental Matters	Potentially contaminative land uses reference Hempnall Fritton Rd WRC in Table 16.12. Anglian Water confirms that this WRC is still operational. In addition, there are rising mains across CRC7, which are also potentially contaminative land uses if any utility strike should occur during the laying of underground cables. These rising mains should also be identified as potential contaminative uses in the ES, and appropriate mitigation measures identified in the oCEMP. Anglian Water agrees that intrusive ground investigations and assessment will help to locate our assets and inform the detailed design to avoid potential hazards to human health and releases of contamination to groundwater through the construction phase.	No	The rising mains that cross CRC7 are not considered as Sources of Potential Contamination within **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [EN0110014/APP/6.3.16.1]** and **ES Volume 1, Chapter 16 - Ground Conditions [EN0110014/APP/6.1.16]** as these are assumed to be suitably maintained by Anglian Water such that leaks of sewage onto / into the land do not occur. There are also no recorded pollution incidents within the EA's dataset associated with these mains. Whilst there is potential for contamination to occur as a result of a strike to these mains during construction. While there is potential for contamination to occur as a result of a strike to these mains during construction, adherence to the measures outlined in the o**CEMP [EN0110014/APP/7.1]** will ensure the risk of service strikes is minimised and contamination risks avoided. An Emergency Response Plan will include details for pollution prevention and will be prepared and included alongside the detailed CEMP(s). A protocol for dealing within any unexpected contamination will be developed by the Principal Contractor and will include: • Details of a watching brief and toolbox talks; • Details regarding how any affected area will be delineated, protected, investigated and assessed; • The qualifications and competencies of the person appointed to oversee the works;

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			• The preparation of a method statement for how the contamination will be dealt with or remediated (as appropriate); • An escalation policy describing when and how any notifications and approvals will be agreed with the relevant planning authority; and • Details of verification procedures for any mitigation or remediation works.
Scheme Description	Section 18.3 identifies that a desk-based search has been undertaken to assess the likelihood of significant effects on telecommunications, utilities, and television reception. Anglian Water's assets are included and identified in Figure 18.1. Anglian Water agrees that there is the potential for our assets to be affected during the construction of the Project, and precautionary measures will need to be employed as part of the embedded mitigation measures. Anglian Water supports the inclusion of Protective Provisions for third parties in the DCO and would seek to ensure there are bespoke Protective Provisions for Anglian Water – template provisions have been provided to the Applicant.	No	The potential exists for utilities shown in **ES Volume 2, Figure 18.1 [EN0110014/APP/6.2.18.1]** to be affected during the construction of the Scheme through damage caused by excavation and engineering operations. Precautionary measures will be included as part of the embedded mitigation for the Scheme, which includes developing the detailed design of the Scheme having regard to utilities protection zones, the use of ground penetrating radar before excavation to identify any unknown utilities, the use of HDD to avoid excessive trenching where practicable and the inclusion of protective provisions for third parties in the DCO which ensure appropriate protections are in place. These measures would reduce the likelihood of effects on utilities during construction and are detailed in the **oCEMP [EN0110014/APP/7.1]**. Protective Provisions in favour of Anglian Water have been included within Schedule 14 (Protective Provisions) to the **Draft DCO [EN0110014/APP/3.1]** The Applicant welcomes Anglian Water's comments in relation to these.
Water environment	Anglian Water is also supportive embedded mitigation, and implementation of the relevant Management Plans (e.g. the CEMP, DEMP and OEMP). It is recommended that further advice should be sought from Anglian Water on the asset interfaces of the Project – this advice can include: • Clash detection and resolution • Early design and technical assurance • Asset protection and diversion planning • Review of red line boundary implications	No	The Applicant notes this comment and the topics or areas for which advice can be sought. The Applicant welcomes further engagement with Anglian Water, if required.

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Water environment	Whilst, costs would be incurred to support project development and internal planning, this can be discussed further with the Applicant. This would provide a high-level desktop assessment of each interface between the Project and Anglian Water assets or projects, and will be dependent on project size, complexity and requirement from the Project. Typically, this includes input from both Anglian Water Services and our delivery teams. This process will also help to inform mitigation measures in the outline Construction and Environment Management Plan (oCEMP) to be included in the ES.	No	The Applicant notes this comment and acknowledges that costs are incurred as part of the statutory consultation process. The Applicant welcomes further engagement with Anglian Water and will be in contact in the future.
Water environment	Sufficient and practical offsets and/or suitable mitigation measures (e.g. buffers) would need to be included into the oCEMP to ensure construction work is carried out such that impacts on services are minimised. We support direct collaboration with the Applicant on the crossing of utilities.	No	The Applicant welcomes these comments and confirms that the **oCEMP [EN0110014/APP/7.6]** submitted as part of the Development Consent Order (DCO) Application sets out mitigation measures to minimise the effects on water resources during construction. The Applicant has also included a set of protective provisions for the benefit of Anglian Water in **Schedule 14 of the draft DCO [EN0110014/APP/3.1]** and the Applicant welcomes Anglian Water's comments on these.
Water environment	Anglian Water has held initial discussions with the Applicant and looks forward to progressing negotiations prior to the submission of the DCO Application, to ensure safeguarding distances and measures for working in proximity to our assets will be incorporated into the development parameters for the Scheme and protective provisions agreed where required. The template Protective Provisions for Anglian Water has been sent to the Applicant for inclusion in the DCO. Anglian Water welcomes the assurance that any safeguarding areas that are in place for existing infrastructure will be observed and incorporated	No	The Applicant notes this comment and welcomes further engagement, where required. The Applicant has included a set of protective provisions for the benefit of Anglian Water in **Schedule 14 to the draft DCO [EN0110014/APP/3.1]** and the Applicant welcomes Anglian Water's comments on these.

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	into the design of the Scheme assessed in the ES.		
Water environment	Anglian Water requires the following standoff distances are applied for working each side of the medial line of Anglian Water pipes. This information is taken from our Protective Provisions template which will need to be agreed with Anglian Water prior to the DCO Application submission. • 4 metres where the diameter of the pipe is less than 250 millimetres; • 5 metres where the diameter of the pipe is between 250 and 400 millimetres; and • A distance to be agreed on a case-by-case basis and before the submission of the plan under sub-paragraph (1) is submitted where the diameter of the of the pipe exceeds 400 millimetres.	No	The Applicant has included a set of protective provisions for the benefit of Anglian Water in **Schedule 14 to the draft DCO [EN0110014/APP/3.1]** and the Applicant welcomes Anglian Water's comments on these.
Cumulative impact	It is noted in para 18.3.19 that the Project has been assessed as having no likely significant effects on utilities, and no cumulative effects are expected.	No	This is noted by the Applicant.
Cumulative impact	Anglian Water's PR24 Business Plan represents £11 billion investment across the region in AMP8 (2025-2030) – this includes a number of investment schemes within South Norfolk. Specifically in relation to the Project, Anglian Water will be delivering nutrient removal schemes at Hempnall Fritton Rd WRC, which are part of our Water Industry National Environment Programme (WINEP) environmental obligations. It is considered that these schemes should be recorded as developments that have been identified but have not yet received planning approval. As environmental obligations these schemes must be delivered by 31 March 2030.	No	These schemes have not received planning approval and fall outside the Planning Inspectorate best practice guidance on cumulative assessment. As such, they're not included within the list of cumulative schemes.

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	This would potentially coincide with the construction of the Project and may result in cumulative and in-combination effects of a temporary nature – such as localised effects on transport and access around Hempnall.		
Cumulative Impact	The nutrient removal schemes still need to go through development milestones to agree design and delivery phases. However, the Applicant should be aware of the potential overlap of delivery timescales, and the potential need for cooperation and collaboration between both parties to manage any in-combination effects that might arise as a result.	No	These schemes have not received planning approval and fall outside the Planning Inspectorate best practice guidance on cumulative assessment. The Applicant will continue to engage with Anglian water.
Water Environment	Anglian Water will seek to engage further with the Applicant through the pre-application phase to discuss, amongst other matters: • Impact of construction/operation of the Project on Anglian Water's water and water recycling assets • The design of the project to minimise interfaces with Anglian Water's existing and proposed assets and specifically to avoid the need for diversions which have carbon costs • The need for potable water supply connections (including tankering requirements) • Draft Protective Provisions and Requirements, and • The preparation of a draft Statement of Common Ground prior to submission.	No	The Applicant welcomes further engagement with Anglian Water and notes the matters outlined.

1.20 Environment Agency

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
General	We have reviewed the report and consider that further information is required for the Environment Agency (EA) to provide a definitive response to relevant environmental impacts and provide the best possible advice to the Planning Inspectorate (PINS). It is strongly recommended that any further reports, statements or surveys that require our review and/or agreement are submitted as soon as possible to resolve any issues before the Development Consent Order (DCO) is submitted.	No	The Applicant has and will continue to engage with the Environment Agency. The Applicant met with the EA on 15 December to discuss the surveys and assessments that require review or agreement ahead of the DCO Application. The Applicant has shared relevant documents with the EA in advance of the submission where practicable.
Water environment	We are satisfied that there are no significant flood risk implications from this proposal. However, there are still some points of detail that need to be considered as the proposal is further developed.	No	The Applicant welcomes this comment.
Ecology and biodiversity	There are specific aquatic species and habitats that need further consideration, and some aspects of the assessment criteria should be reviewed.	No	An assessment of impacts upon aquatic invertebrates, white-clawed crayfish freshwater fish, water vole and otter is provided within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**.
Ecology and biodiversity	Fisheries: We are satisfied with the proposed approach regarding eDNA surveys and habitat assessment for fish species to be presented in the Environmental Statement.	No	The Applicant welcomes this comment.
Ecology and biodiversity	Fisheries: We are satisfied that any impacts of EMF on fish will be discussed in the Environmental Statement.	No	The Applicant welcomes this comment.
Ecology and biodiversity	Fisheries: We request the opportunity to review further habitat and species surveys as these are progressed.	No	The Applicant welcomes Environment Agency engagement with the further information provided in the **ES [EN0110014/APP/6.1]** and associated appendices.
Ecology and biodiversity	We consider that the valuation given here to chalk stream habitat does not reflect its national/ international importance and should be reviewed.	Yes	The River Tas is classified as a chalk stream. Due to the habitat's international rarity (85% of the world population is found in the south and east of England) it is attributed Regional ecological importance. Whilst the Hempnall Beck (CRC7), and its tributary (CRC6), and Tas tributary (Sub-Sites 8A/8B) (and other watercourses)

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			are not considered to be chalk streams as such, it is considered that these are of Regional importance due to their linkage to the Tas catchment. The river is assessed in full in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**.
Water environment	Surface Water Quality: We request the opportunity to review the outline Environment Management Plans and associated topic plans as they are developed. Additional information is required to ensure potential impacts on surface water quality are mitigated.	No	Outline Environmental Management Plans for all phases of the Scheme have been prepared for the application, and the EA will have the opportunity to engage and comment throughout the examination period.
Other environmental matters	Water Resources: We welcome the inclusion of a water resources assessment, and we acknowledge that further detail will accompany the ES	No	The Applicant welcomes this comment.
Other environmental matters	Water Resources: We support the early consideration of water resource requirements in this water-restricted location, to avoid potential delays in development post DCO.	No	The Applicant welcomes this comment.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Water Environment	Document Reference: PIER Chapter 9 – Water Environment Table 9.3: Flood Risk has been scoped out within the Water Environment assessment. Impacts on watercourses and the floodplain from the construction, operation, and decommissioning of the proposed development have not been considered. Flood risk impacts that have been identified within the FRA should be included within the Water Environment chapter to assess the environmental significance of these aspects of the development. Design mitigation measures are set out in Paragraph 9.2.9. These do not include reference to the design flood event (including appropriate allowance for climate change). It is therefore not clear what impact the development will have under this scenario. Impact: on watercourses and the floodplain from the construction, operation and decommissioning of the proposed development have not been considered	Yes	Assessment on flood risk using the NaFRA2 mapping and detailed Yare-Tas hydraulic modelling has been undertaken including climate change. All electrical infrastructure has been located outside of Flood Zones 2 and 3, and as far as practicable, outside of areas of 'low' to 'high' surface water flood risk. Solar PV Arrays are raised on narrow supports so as to not impede flood flow routes See **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** for further information.
Water Environment	Document Reference: Appendix 9.1 – Flood Risk Assessment Section 5.7.8: Impacts of climate change have not been assessed for the Starston Brook, adjacent to the potential siting of the National Grid Substation. There is the potential for inadequate mitigation against future flooding of critical infrastructure. A flood level for Flood Zone 2 has been derived using LiDAR at this location. This does not include an allowance for climate change. A more detailed assessment of the flood extents and climate change impacts for this watercourse should	Yes	Order Limits have been amended so that they no longer include areas of Flood Zones 2 and 3 associated with the Starston Brook. **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** outlines that any works are located a significant distance and elevation above the floodplain of the Starston Brook.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	be completed to assess suitable mitigation measures for the National Grid Substation. Alternatively, this area of the site should be considered unsuitable for locating critical infrastructure. Impact: There is the potential for inadequate mitigation against future flooding of critical infrastructure.		
Water Environment	Document Reference(s): Appendix 9.1 – Flood Risk Assessment Section 5.7.10, 5.8.5, 6.2.6: It is not clear what extent of solar panels will be located within the design flood extent (including appropriate allowance for climate change). Therefore, it is not possible to assess the level of flood mitigation that will be required. Potential flood risk associated with infrastructure located in the design flood extent. Flood mitigation measures cannot be adequately assessed. The above referenced sections of the FRA state that: 1. Solar panels will be located in low flood risk areas as far as reasonable practicable, 2. Solar panels (and associated infrastructure) will be raised on supports at significant freeboard above ground, 3. Flood Zones 2 and 3 will be left as open landscaped buffers to watercourses. Further detail should be supplied showing layouts of solar panels and the design flood extent. A sequential approach should be followed in order to locate all panels outside of this extent, where feasible. Flood mitigation may be required where panels are located within the design flood extent. Impact: Potential flood risk	Yes	All above ground electrical infrastructure is located outside of areas of Flood Zones 2 and 3, and the modelled 1 in 1000 (0.1%) annual probability plus allowance for climate change floodplain The extent of Solar PV Array supports within surface water flood risk areas has been quantified within **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** and is shown to be negligible.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	associated with infrastructure located in the design flood extent. Flood mitigation measures cannot be adequately assessed.		
Water Environment	Document Reference: Appendix 9.1 – Flood Risk Assessment Section 7.1.3: The impact of solar panel support piles located within the design flood extent, has not be quantified. The locating of panel supports within the design flood extent has a potential impact on floodplain storage volumes. There may therefore be a requirement for floodplain compensation. It is acknowledged that the impact on floodplain storage volumes from support piles is likely to be negligible, however for completeness, this should be quantified and confirmed within the FRA. Impact: The locating of panel supports within the design flood extent has a potential impact on floodplain storage volumes. There may therefore be a requirement for floodplain compensation.	Yes	The extent of Solar PV Array supports within surface water flood risk areas has been quantified within **ES, Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** and is shown to be negligible.
Water Environment	Document Reference: Appendix 9.1 – Flood Risk Assessment Section 7.3.2: Reference is made to the requirement for access crossings over, and cable route crossings beneath, watercourses. No further detail on locations and methodologies has been provided. Crossings, both under and over Main River Watercourses, have the potential to increase flood risk, which must be assessed and avoided. In addition to increased flood risk, culverting can have an adverse effect on aquatic habitat, habitat connectivity and flow regime. Culverting existing watercourses/drainage ditches should be avoided in favour of clear span bridges. Where culverting for access is unavoidable, applicants should demonstrate that no reasonable	No	Methodologies and locations for cable crossings (including Avoidance Areas) are provided in **Outline Cable Route Construction Statement [EN0110014/APP/7.21]** Watercourse crossings schedule will be prepared post-consent and is secured through **OCEMP [EN0110014/APP/7.1]** and **OOEMP [EN0110014/APP/7.2]**

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	alternatives exist and where necessary it will only be in place temporarily for the construction period. [paragraph 2.10.87 and 2.10.88 of NPS EN-3]. Where underground cables are proposed beneath watercourses, we would require HDD for main rivers.		
Protective provisions	If any of the works are likely to require a FRAP under the Environmental Permitting Regulations, we recommend the applicant consider early on whether they might consider the disapplication of the EPR and matters pertaining to FRAPs be considered as Protective Provisions under the DCO.	Yes	The Applicant is seeking to disapply the Environmental Permitting (England and Wales) Regulations 2016 in respect of a flood risk activity. The Applicant has included protective provisions for the benefit of the EA in the draft DCO and will engage with the EA to seek to agree the form of protective provisions.
Water Environment	The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culvert (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.	Yes	The Applicant is seeking to disapply the Environmental Permitting (England and Wales) Regulations 2016 in respect of a flood risk activity. The Applicant has included protective provisions for the benefit of the EA in the draft DCO and will engage with the EA to seek to agree the form of protective provisions.
Ecology and biodiversity	Issue: The assessment methodology does not comply with industry standard guidelines (CIEEM Guidelines for Ecological Impact Assessment, 2024). For example: Table 8.6 sets out the characteristics for consideration when assessing effects, however the preliminary assessment makes little reference to these characteristics.	Yes	This has been taken into account and amended within the **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**.

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	Table 8.7 sets out 'Magnitude criteria' which don't relate to industry standard guidance and are considered somewhat subjective. The approach to determining the significance of impacts in 'EIA terms' with all effects below 'Moderate' considered not significant does not to adhere to CIEEM guidance. Impact: The impact assessment conclusions may underestimate ecological impacts, resulting in insufficient mitigation.		
Ecology and biodiversity	Issue: The proposal to use eDNA survey methodologies for presence/ absence surveys is not sufficient to establish the absence of these species. Impact: Risk that the presence of species on site will not be identified, and therefore any impacts will not be mitigated.	Yes	Ponds within the Order Limits were subject to eDNA survey. Those ponds that were returned as Positive for GCN were buffered by 50m to reduce direct impacts to GCN and their habitats. Ponds that were returned as conclusively negative i.e. suitable quality water sample, were considered absent of GCN. These were buffered by 30m. For ponds where the eDNA surveys were returned as inconclusive (water clarity was too poor for an accurate result) or if access to the ponds was not possible, a precautionary 50m buffer was applied to those ponds. The CIEEM (2018) In Practice (https://cieem.net/wp-content/uploads/2020/03/InPractice99_Mar2018.pdf) publication suggested that eDNA surveys recorded positive results for known GCN ponds in 99.3% of survey visits compared to 95% using traditional survey methods. eDNA should be considered a valid survey methodology and it should be acknowledged that inconclusive results were not taken as GCN absence and those ponds have been afforded the same 50m buffer as positive ponds. A full suite of GCN eDNA survey results is found in **ES Volume 3, Appendix 8.3 - Great Crested Newt Survey Report [EN0110014/APP/6.1.8.3]**.
Ecology and biodiversity	Issue: There is insufficient qualification provided to support the assessments of importance of ecological receptors. In some cases (e.g. Lowland Fen, Rivers) these receptors may be undervalued (eg. local importance). Aquatic invertebrates may be under-rated at 'Local' importance. The summarised records include notable species such as Norfolk Hawker	Yes	Irreplaceable Habitat (i.e. Lowland Fen) has been given the receptor value of County and Rivers have been given the receptor value of Regional. Aquatic Invertebrates have retained their receptor value of Local. While legally protected and priority invertebrate species are present within the wider landscape, there is no evidence that the Order Limits support populations of County, Regional, National or International importance. The ecological importance of

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	which would imply a higher valuation for this species group. Impact: Undervaluation of ecological features would result in a negative impact on conclusions of impact assessment. EIA should present detailed survey data to fully justify assessments.		protected invertebrates in relation to the proposed development is therefore assessed as Local. These have been assessed within the **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**.
Ecology and biodiversity	Issue: There is a lack of baseline information provided on aquatic invertebrates, and the potential risks to invertebrate receptors have not been adequately assessed. Invertebrate attraction to solar panels is not listed as an impact pathway. Impact: There is a risk of potential impacts on notable aquatic invertebrate species (Norfolk Hawker), for which there are local records close to the site.	Yes	See survey details and results in the **ES Volume 3, Appendix 8.9 - Aquatic Habitat Assessment Report [EN0110014/APP/6.1.8.9]**. A detailed assessment is found in section 8.6 of the **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**. During operation, there will be no routine in-channel works or direct disturbance to aquatic habitats.
Ecology and biodiversity	Issue: The habitat loss or change impact pathway for construction does not mention aquatic habitats which may be affected by watercourse crossings for access. Impact: Potential impacts of watercourse crossings on aquatic/ riparian species and habitats may be unassessed and unmitigated.	Yes	Aquatic and riparian species and habitats have been assessed as part of the **ES Volume 3, Appendix 8.9 - Aquatic Habitat Assessment Report [EN0110014/APP/6.1.8.9]**.
Ecology and biodiversity	Issue: There is inconsistency throughout the document regarding the quoted buffers for ditches and watercourses. e.g. Table 5.1 States 10m for ditches and minor watercourses and 30 m for 'major' watercourse (undefined), but paragraph 8.7.81 quotes 15m for minor watercourses, and 30m specifically for Hempnall Beck. Lack of clarity. Risk of insufficient protection of watercourse habitats and species. Review proposals and ensure a consistent approach to providing buffers alongside watercourse.	Yes	As detailed within **ES Volume 3, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]**, all watercourses and ditches are buffered to 10m. No 'major' watercourses are located within the Order Limits.
Ecology and biodiversity	Para 8.7.28 The Ancient woodland at Spring Wood is classed as irreplaceable habitat under the NPPF, and is	Yes	To create a varied structure at the edge of Spring Wood Ancient Woodland, the Green Infrastructure Strategy includes mixed scrub planting and tussocky grassland habitat provided immediately adjacent to the ancient woodland

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	identified as an area of Particular Importance for Biodiversity (APIB) in the Norfolk Local Habitat Map. The area of Site 3 (next to Spring wood) is identified within this Local Habitat Map as an area that 'Could become of Particular importance for Biodiversity' (ACB). The developer should consider using the land parcels adjacent to the woodland for restoring woodland and planting trees. This would give greater uplift in unit value under the BNG metric due to strategic significance multiplier being applied subject to the final version of the LNRS published later this year 2025.		habitat. Provisions of these habitats are detailed in the **OLEMP [EN0110014/APP/7.4]** and **Biodiversity Net Gain Assessment [EN0110014/APP/7.23]** and associated **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24].**
Ecology and biodiversity	8.7.140 Ponds are an important and threatened feature of the agricultural landscape in Norfolk and we welcome the intention to protect and restore ponds within the project area. The Norfolk Ghost Ponds project should be contacted for advice regarding the restoration of farmland ponds	Yes	No direct effects on ponds are anticipated. The retention of all ponds within the Order Limits, and implementation of extensive buffer zones surrounding all ponds within the operational land parcels, will avoid all direct impacts during the construction phase. Adopted pond buffer zones applied to the design of the Scheme are provided within the **Design Principles, Parameters and Commitments [EN011014/ APP/7.18]**
Water Environment	Document Reference: Chapter 8 – Table 8.5 and Chapter 9 - Section 9.4.1: Chalk stream (river) habitats have been wrongly valued as "Medium" sensitivity. This does not reflect the national/ international importance of chalk stream habitat, as 85% of the world's chalk rivers/streams are found in England. Undervaluation of the habitat will negatively affect any impact assessment and may result in deterioration of the habitat.	Yes	The sensitivity of chalk streams has been amended in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**.
Water Environment	If river crossings (bridges/culverts) are required as part of the development, we would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.	Yes	This comment is noted by the applicant. River crossings for internal haul routes for cable installation will be temporary ramp (form to be confirmed) with design to prioritise open span features that do not interfere with watercourse banks over culverts as far as possible as outlined in the **oCEMP [EN0110014/APP/7.1]**. The ramps will be removed following installation of the cables. The type of crossing will be identified at the detailed design stage.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Water Environment	Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the EA. WFD applies to all surface waterbodies, not just those designated for monitoring purposes. Small watercourses and WFD - watercourses with a catchment less than 10km/2 connected to a downstream WFD waterbody take the classification of that waterbody.	Yes	A WFD assessment has been completed which addresses potential impacts across the project life cycle and considers relevant surface waterbodies which may be impacted by the Scheme: **ES Volume 3, Appendix 9.2 -Water Framework Directive Assessment [EN0110014/APP/6.3.9.2].**
Ecology and biodiversity	BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric. [BNG guidance is mentioned here because the EA usual buffer for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of banktop to be encroaching on the watercourse.]	Yes	This is noted by the Applicant. There will be a minimum buffer of at least 10m from all watercourses, except where the watercourses are crossed. Although the aim is to avoid watercourse crossings within the Order Limits, there are several locations where crossings will be necessary. Where there are any access routes or CRC crossings across field drains or WFD waterbodies, these have been assessed within **Es Volume 3, Appendix 9.2 - Water Framework Directive Assessment [EN0110014/APP/6.3.9.2]**.
Water Environment	• Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.	Yes	This is noted by the Applicant. Q95 scores have not been used in **ES Volume 1, Chapter 9 – Water Environment [EN0110014/APP/6.1.9]** and have been replaced by Water Supply/Deficit balance. Watercourse sensitivity is defined predominantly by the Water Framework Directive classification, however other factors as outlined in Table 9.3 of ES Chapter 9 have been considered.

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	• WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated. • Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.		
Ground Conditions	Document Reference: Volume I Chapter 3 Section 3.12.1 and 3.12.2: The overview for Site 10 does not reference the historic use of the eastern part of the Site as part of the former RAF Seething / USAAF Station 146. Potential for contaminants to be present associated with historic land use which have not been adequately considered with respect to risk posed to groundwater.	Yes	It is noted that this comment relates to PEIR Volume 1 Chapter 3 Section 3.12.1 and 3.12.2 (The Site - Site 10 Overview) not to the ground conditions chapter. **ES Volume 1, Chapter 3 - The Order Limits [EN0110014/APP/6.1.3]** has been amended to reference RAF Seething within the overview for Site 10. Potential contamination associated with former RAF Seething is addressed in the **ES Volume 3, Appendix 16.1 - Ground Conditions Assessment [EN0110014/APP/6.3.16.1]**, Phase 1 Ground Conditions Assessment. This Chapter includes assessment of the former RAF Seething.
Ground Conditions	Document Reference: Volume I Chapter 3 Section 3.5.19, Volume I Chapter 9 Section 9.4.17. There is a lack of consistency between the number of private water abstractions indicated in Chapter 9 of the PEIR and Appendix 16.1. The assessment of risks posed to private groundwater abstractions cannot be adequately assessed.	Yes	Assessment of potential risks and impacts to private water supplies from mobilisation of existing contamination in the ground are provided in **ES Volume 3, Appendix 16.1 -Ground Conditions Assessment [EN0110014/APP/6.3.16.1]** and **ES Volume 1, Chapter 16 - Ground Conditions [EN0110014/APP/6.1.16]** respectively. Additional work has been undertaken to identify private water supplies and licenced abstractions in **ES Volume 3, Appendix 9.3 - Water Resources Assessment [EN011014/APP/6.3.9.3].**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			Due to new groundwater or surface water abstraction options being scoped out, there is no potential impact from abstraction on existing lawful water users in the area including both licenced abstractions and unlicenced (private) water supplies.
Water Environment	Sub-Site 3A is stated to have a number of private water supplies in its vicinity, however no further information is provided on these including whether these are from surface water or groundwater sources, and the strata from which these abstractions take place. We note that Sub-Site 3A is no longer proposed to hold solar farm infrastructure. Several wells are indicated on British Geological Survey mapping and are evident across the Proposed Development in historic Ordnance Survey maps appended to Volume III Appendix 16.1, some of which may remain in active use. The PEIR and appendices do not appear to consider these potential receptors.	Yes	Sub-Site 3A is no longer included within the Order Limits/Scheme.
Water Environment	In Section 9.4.17 of Chapter 9 the Applicant refers to 33 private water supplies in the area, assessed as having varied sensitivity between Very High and Medium based on proximity to the site. There is no indication of how many of these are abstractions from groundwater or surface water. We note that Table 9.1 of Volume I Chapter 9 states that information on abstraction quantities from the private water supplies is awaited and that assessment of potential impacts to private water supplies will be undertaken as part of the Water Resources Assessment and ES.	No	The Applicant has looked into this as part of **ES Volume 3, Appendix 9.3 - Water Resources Assessment [EN011014/APP/6.3.9.3].** and **ES Volume 1, Chapter 16 - Ground Conditions [EN0110014/APP/6.1.16]**. Due to new groundwater or surface water abstraction options being scoped out, there is no potential impact on existing lawful water users in the area including both licenced abstractions and unlicenced (private) water supplies. This is outlined in **ES Volume 3, Appendix 9.3 -Water Resources Assessment [EN011014/APP/6.3.9.3].**
Ground Conditions	Sections 2.6.1 to 2.6.4 of the Phase 1 Ground Conditions Assessment (Appendix 16.1) discusses the result of consultation with South Norfolk and Broadland District Council. This identifies 35 private	Yes	Assessment of potential risks and impacts to private water supplies from mobilisation of existing contamination in the ground are provided in **ES Volume 3, Appendix 16.1 - Ground Conditions Assessment**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	water supplies within 250m of the then-current boundary of the Proposed Development – indicating an additional two private abstractions. The Applicant was not provided coordinates for the abstractions, or details of the abstracted strata. We understand that the Applicant is awaiting further detail of these private abstractions, and potential impacts from the Proposed Development to these abstractions should be considered in the ES. If the Applicant is unable to acquire more accurate positional data for private groundwater abstractions than is available from South Norfolk and Broadlands District Council (Annex 4 of Appendix 16.1) then a precautionary approach should be adopted based on the information available. This issue was previously raised by the Environment Agency during Scoping as item GWCL3. Further information is provided in the supporting Ground Conditions Assessment (Appendix 16.1) and this should be cross-referenced.		**[EN0110014/APP/6.3.16.1]** and **ES Volume 1, Chapter 16 - Ground Conditions [EN0110014/APP/6.1.16]** respectively. The potentially active private water supplies within the study area have been identified from a review of EA abstraction data (on the basis that a formerly permitted abstraction for farming purposes may now still be utilised for domestic supply – i.e., below the 20m3 per day permit limit), a review of the BGS' water wells dataset, and information provided by the LPA. It is noted that due to the LPA's concerns regarding GDPR, the Applicant has not been able to state the co-ordinates of these supplies, or to show the locations of these supplies on drawings.
Water Environment	Document Reference(s): Volume III Appendix 16.1 Section 2.6.8: The Ground Conditions Assessment provides information provided by the Environment Agency, which found that there were no abstraction licenses within the shapefile area (i.e. the Scoping boundary) and none within a 250m buffer. The potential for water quality impacts to abstractions over 250m from the Proposed Development boundary cannot be fully discounted, particularly where Principal aquifers with high groundwater transmissivity are present (chalk and Norwich Crag Formation bedrock).	Yes	Assessment of potential risks and impacts to private water supplies from mobilisation of existing contamination in the ground are provided in **ES Volume 3, Appendix 16.1 - Ground Conditions Assessment [EN0110014/APP/6.3.16.1]** and **ES Volume 1, Chapter 16 - Ground Conditions [EN0110014/APP/6.1.16]** respectively. As described in **ES Volume 3, Appendix 16.1 - Ground Conditions Assessment [EN0110014/APP/6.3.16.1]** and **ES Volume 1, Chapter 16 - Ground Conditions [EN0110014/APP/6.1.16]** the study area for identification of groundwater abstractions, private water supplies and groundwater source protection zones has been set at 1km from the BESS and any Project Substation (where deeper piled foundations might be required). For all areas where deep piled foundations will not be utilised, e.g., PV arrays and cable trenching, a 250m study area has been used for identification of groundwater abstractions, private water supplies and groundwater source protection zones.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Water Environment	Document Reference(s): Volume I Chapter 9 Table 9.4 and Table 9.5, Volume I Chapter 16 Table 16.4 and 16.5: The tables do not define sensitivity categories or impact magnitudes for groundwater dependent terrestrial ecosystems (GWDTEs). Potential impacts on GWDTEs may not be adequately assessed.	Yes	GWDTEs have been added as receptors in **ES, Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**.
Ground Conditions Water Environment	Document Reference(s): Volume I Chapter 9 Section 9.5.7, Volume III Appendix 9.1 Flood Risk Assessment and Outline Surface Water Drainage Strategy Section 8.4.4 and Section 8.9.5, Volume III Appendix 16.1 Ground Conditions Assessment Tables 5.4 and 5.5: The report includes measures to control surface water runoff from the BESS compound and to contain firefighting water in the event of a fire. There are no measures to monitor for, and respond to, pollutants from leaks and spills during operation at the BESS compound and Substations, or for the control of firefighting runoff from fires at Substations. Potential risk to groundwater quality from the operation of BESS compound; National Grid Substation and other Substations; and from firefighting impacts from substations where no containment is provided. The use of shallow infiltration drainage could result in contaminants entering the underlying Principal aquifer if there is an insufficient thickness of underlying low permeability superficial deposits, or if piling activities create a new migration pathway. Provide adequate mitigation to manage pollution impacts to controlled waters from spills and leaks and firefighting activities at the BESS and all Substations. Describe the anticipated ground conditions at the substation sites and associated	Yes	Detail on the proposed surface water drainage strategy for the Substation areas is provided in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.The drainage systems will be lined with an impermeable membrane to prevent leaching of any potential contaminants to the underlying geology/aquifers Measures to control risk from leaks/spills during operation are provided in **OOEMP [EN0110014/APP/7.2]**.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	measures to prevent significant impacts to groundwater quality from any oil containing plant at these sites. Where oil filled plant are proposed at substation sites, the drainage infrastructure should be lined and provide sufficient containment to prevent direct infiltration of potentially contaminated operational runoff and firefighting water.		
Other Environmental Matters	The following scenario should be taken forward into any detailed design stage for BESS drainage design: A fire takes place in a BES battery container and the fire suppression system is activated, automatically closing the drainage system. The suppression system ultimately extinguishes the fire but the fire water is contaminated by the fire damaged batteries. If a gravel attenuation substrate is used, how would any sorbed contamination in this substrate be managed, as this could act as an ongoing secondary source of contamination of rainwater runoff following the removal of contaminated fire-water post-event? If the substrate is found to have an ongoing issue would all containers need to be removed to enable remediation of this material? Catchment zoning and isolation should be considered in this case. Alternatively, an above-ground attenuation system would make managing sediment or surface contamination easier. The system should incorporate a penstock valve automatically triggered in the event of a BESS fire. The oOEMP should include ongoing maintenance and testing of penstock valve(s) as traditional penstocks, when not operated for a long period of time, have historically been known to seize up and thus be inoperable at times of emergency.	Yes	The Scheme commits to having a lined drainage system with an auto-shut off/self-actuating penstock valve as set out in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Drainage Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**. The valve will be inspected on a regular basis as set out in **OOEMP [EN0110014/APP/7.2]**. Further information on the BESS safety management measures is provided in **Outline Battery Safety Management Plan [EN0110014/APP/7.2]**.

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Water Environment	The Applicant indicates in Appendix 9.1 that surface water runoff from the proposed Substations (excluding the National Grid Substation) represents a low pollution risk to water receptors and that shallow infiltration drainage features may be a viable drainage solution for this and for certain elements of the National Grid Substation.	Yes	It is no longer proposed to utilise infiltration/natural percolation for the Project Substations. It is proposed to utilise the same approach across the whole Scheme with the inclusion of drainage systems lined with an impermeable membrane.
Water Environment	Section 8.8.4 of Appendix 9.1 states that drainage arrangements for the 132kV and 400kV Substations would incorporate a 300mm aggregate sub-base, lined with an impermeable geotextile to allow infiltration to ground. Section 8.9.5 of Appendix 9.1 states that the National Grid Substation may incorporate infiltration drainage for elements such as the inverter units and building arrangements.	No	Standalone inverter/converter units and cabins will drain to a permeable surface with underlying aggregate sub-base or filter drain, with overflow outlet as required.
Other Environmental Matters	Spills and leaks or firefighting runoff from oil-containing plant in substation infrastructure such as transformers could pose a significant pollution risk if not suitably designed and managed. The distribution of proposed Substation developments across the Proposed Development may include sites where a credible migration pathway from any infiltration feature to the underlying Principal aquifer could be present, particularly if piled foundation construction introduces a new migration pathway.	Yes	Transformers will be set on a plinth and bunded to contain any oil leaks. Runoff with any oil spills from these areas will drain to a dump tank or similar filtering facility. The wider surface water drainage system will be lined with an impermeable membrane.
Water Environment	Document Reference(s): Volume III Appendix 9.1 Section 3.4.11: Section 3.4.11 of Appendix 9.1 states that piled foundations in excess of 20m length are highly unlikely to be required at the BESS and National Grid Substation (Site 1) and therefore these are unlikely to pose a hazard to the underlying aquifer or associated abstractions. There is insufficient information currently available at present to fully discount the risks from deep piled foundations. Impact: Risk of creating contaminant migration pathway to groundwater.	Yes	On the basis of the information available and that has been reviewed it is considered highly unlikely that development of the structures that could potentially require piled foundations, within land with a longstanding history of agricultural use, would present a hazard to groundwater at depth within the underlying chalk. As described within the **OCEMP [EN0110014/APP/7.1]** ground investigation and interpretative assessment will be undertaken post-consent, with the results used to inform the detailed design of the proposed development, including selection of an appropriate piling methodology, should piled foundations be required.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Water Environment	Document Reference(s): Volume I Chapter 9 Sections 9.6.8, 9.6.14, 9.6.16 and 9.6.18: Possible copy/paste error with repeated reference to potential construction phase impacts from ground compaction, which is not relevant to the specific paragraphs.	Yes	Wording has been corrected within **ES, Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**.
Water Environment	Document Reference(s): Volume I Chapter 9 Section 9.6.11 and 9.6.12: Section 9.6.12 (Operation Phase) erroneously refers to effects from construction and decommissioning activities on water resource zones rather than effects from operation. The text in Section 9.6.2 appears identical to that in 9.6.12 hence it is unclear whether this represents the Applicant's assessment or a copy and paste error. Lack of clarity. It is unclear which development phase is being assessed, which raises doubt about whether the impact significance presented is correct. Correct this error and check that the assessed significance is correct.	Yes	Wording has been corrected within **ES, Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**.
Water Environment	The Environment Agency regulates the abstraction of water from surface water and underground sources. An abstraction licence is not needed to install and test a borehole solely for the purpose of firefighting (including training and testing). It is recommended the operator of the site obtains a groundwater investigation consent (under section 32/3 of the Water Resources Act 1991) so they can find out whether there is adequate water available.	No	Due to new groundwater or surface water abstraction options have been scoped out due to the water scarcity in the region. This is outlined in **ES Volume 3, Appendix 9.3 - Water Resources Assessment [EN011014/APP/6.3.9.3].**
Ground Conditions	Document Reference(s): Volume I Chapter 16 Table 16.3 Ground Conditions Scoping Summary: Figure 16.3 contradicts stated distances between Sources of Potential Contamination (SPCs) and the presence of on-site property. The rationale for discounting effects from SPC3 and SPC8 due to distance may be inaccurate.	Yes	The former SPC3 (now SPC5 – Landfill – "Off west side of Shelton Airfield Disused") is now located wholly off-Site, the nearest sub-Site in which construction is proposed is 3B, located approximately 160m to the north. As SPC5 is now wholly off-site, the Phase 1 GCA now only the risks to on-site receptors are considered. The assessment of the risks of off-site sources to off-site receptors is outside of the scope of the Phase 1 GCA.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			There are no proposed enclosed structures into which landfill gases (were any to be present) could migrate and accumulate within 250m of SPC5, with the nearest potential such structure being a 132kV substation located some 800m north of SPC5. The former SPC8 (now SPC4 – Former Refuse Tip) is located within sub-Site 4B and is greater than 250m from any existing property. It is noted that the area of the refuse tip, as shown on the historical mapping, has been excluded from the area in which PV arrays are to be installed. The nearest off-Site property remains the farm approximately 280m to the north-east. It is noted that there are no proposed enclosed structures into which landfill gases (were any to be present) could migrate and accumulate within 250m of SPC4, with the nearest potential such structure being a 132kV substation located some 280m south of SPC4. SPC / PSC Inconsistency between the chapter and the accompanying figures has been resolved.
Water Environment	Document Reference(s): Volume I Chapter 5 Section 5.5.28 and Volume III Appendix 9.2 Water Framework Assessment Section 2.4.14: The Applicant indicates that the current most environmentally acceptable option is to leave buried cables in situ, to avoid disturbance to overlying habits and communities. Potential for buried cables left in-situ following decommissioning to pose an ongoing pollution risk to Controlled Waters.	Yes	Cables will be left in situ post-decommissioning of the Scheme as this is considered to be less damaging to the wider environment. In addition, the cables will not be fluid filled and will therefore not create a significant impact to the wider environment - see embedded mitigation in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**.
Water Environment	Issue: The Applicant indicates that the current most environmentally acceptable option is to leave buried cables in situ, to avoid disturbance to overlying habits and communities. Impact: If used as part of the development, fluid filled cables would pose an increased pollution risk to controlled waters. Fluid filled cables would represent a potentially significant source of	Yes	Cables will not be fluid filled – see embedded mitigation in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	contamination if retained in-situ following the decommissioning phase, as these would ultimately degrade over time resulting in mobile pollutant release. The applicant should avoid the use of fluid filled cables as part of the development.		
Decommissioning and construction	Following decommissioning, any electrical cables present within potential ploughing depth on future agricultural land would be at risk of mechanical damage. This could result in the accelerated release of pollutants including metals and microplastics into the environment from these cables.	Yes	The **Outline Decommissioning Environmental Management Plan (ODEMP) [EN0110014/APP/7.3]** discusses how cables will be handled during decommissioning. The approach to decommissioning for the Interconnecting Cables and Grid Connection Cables would be dependent upon Government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in-situ, as this avoids disturbance to overlying land, habitats and to neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the Grid Connection Cables.
Water Environment	Document Reference(s): Volume I Chapter 5 Section 5.5.28 and Volume III Appendix 9.2 Water Framework Assessment Section 2.4.14: Limited information is currently available on proposed cable construction materials. If used as part of the development, fluid filled cables would pose an increased pollution risk to Controlled Waters. The Applicant should avoid the use of fluid filled cables as part of the development.	Yes	Cables will not be fluid filled - see embedded mitigation in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**.
Reasonable alternatives and design evolution	Volume I Chapter 9 Section 9.5.9 states that the cables to be installed on the site will have standard cross-linked polyethylene (XLPE) insulation. Full details of proposed underground cable design are not currently provided. We urge the developer to avoid the use of fluid-filled cables within the Proposed Development. In accordance with Position	Yes	Cables will not be fluid filled – see embedded mitigation **in ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	Statement C5 of 'the Environment Agency's approach to groundwater protection' the Environment Agency will normally object to pipelines or fluid filled cables that transport pollutants, particularly hazardous substances that: • Pass through SPZ1 or SPZ2 where this is avoidable; • Are below the water table* in principal or secondary aquifers. *For the purposes of the position statement, the term 'water table' is taken to mean any laterally continuous groundwater including perched groundwater. Operators should consider the lifetime of the pipeline or cable in their assessment of the depth to groundwater. Fluid filled cables would represent a potentially significant source of contamination if retained in-situ following the decommissioning phase, as these would ultimately degrade over time resulting in mobile pollutant release.		
Water Environment	Document Reference(s): Volume III Appendix 9.1 Ground Conditions Assessment Section 3.4.5 and 3.4.19: There is no discussion of the anticipated foundation solution for non-National Grid Substations proposed on Sites 1, 3, 4, 5, 7 or 10. If piled foundations are required and not designed appropriately they could mobilise contamination if present, or act as a preferential pathway for contamination to groundwater. The Applicant should provide anticipated foundation design information for all proposed Substation infrastructure and assess the risks posed by these to groundwater quality. The Applicant should commit to the preparation of a	Yes	It is noted that this comment is stated to relate to PEIR Volume III Appendix 9.1 (Flood Risk Assessment & Outline Surface Water Drainage Strategy) but appears to relate to Appendix 16.1. All 6No. Project Substations are assumed (worst-case) to require piled foundations. As described within the **OCEMP [EN0110014/APP/7.1]** ground investigation will be undertaken post-consent to inform the detailed design of the Proposed Development. If the ground conditions are found to be such that piled foundations may be required, and that the piles would penetrate the Diamicton (i.e., would extend through a low-permeability layer into an underlying aquifer), then FWRA will be undertaken.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	Foundation Works Risk Assessment (FWRA) for all parts of the development requiring piling or deep foundation construction. Foundation Works Risk Assessments should be undertaken prior to making any decisions on pile type selection. The FWRA, in line with CL:AIRE guidance, should be a principal determining factor in which pile types are selected, rather than being an afterthought. The Applicant should note that CL:AIRE's piling guidance was updated in March 2025		
Water Environment	Document Reference(s): Volume I Chapter 9 Water Environment Table 9.2, Volume I Chapter 20 Summary of Residual Significant Effects: There is no discussion of the potential impacts of heat emissions from buried high voltage cables on groundwater quality and groundwater dependent terrestrial ecosystems (GWDTEs); and this is not considered as a possible residual significant effect during the operational phase. Potential impacts to sensitive water environment receptors such as GWDTEs may not be considered by the Applicant.	Yes	The cables will be laid at a minimum of 5 metres below the bed of surveyed main rivers. The thermal dynamics of the cables are limited to their immediate proximity and will therefore have no significant effect on receptors. This is secured within the **Design Principles Parameters and Commitments Register [EN0110014/APP/7.18]**
Water Environment	As described in Table 9.2 the EA has raised concerns in the Scoping Opinion on the impact of heat emissions from buried cables to water environment receptors, particularly at the proposed HDD crossing in CRC7. No reference to heat as a pollutant is apparent in Chapter 9 Water Environment, Chapter 16 Ground Conditions or Chapter 18 Other Environmental Matters, and this is not identified as a potential residual significant effect in Chapter 20.	Yes	The potential impacts of heat pollution from cables on water receptors have been assessed within **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**. The assessment concludes that thermal dynamics of the cables are limited to their immediate proximity and will therefore have no significant effect on receptors.
Construction and Decommissioning	Document Reference(s): Volume I Chapter 3 Section 5.5.31: The applicant states that an outline Decommissioning Environmental Management Plan (ODEMP) will be submitted as part of the DCO	Yes	An **ODEMP [EN0110014/APP/7.3]** has been provided by the Applicant as part of the Application. This management plan details potential impacts and mitigations in respect of ground contamination.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	application however little information is provided as to its proposed content. The ODEMP should incorporate measures to prevent contamination and cross-contamination of soils, surface water and groundwater should any source of pollution be identified during decommissioning. We suggest that a Discovery Protocol should be embedded in the ODEMP, similar to the OCEMP. This issue was previously raised by the Environment Agency during Scoping as item GWCL5.		In respect of existing ground contamination, the potential for unexpected contamination will be managed and remediated appropriately such that hazards present during construction are unlikely to be present during decommissioning. Measures during the construction stage outlined in the **OCEMP [EN0110014/APP/7.1]** would apply during the decommissioning phase in principle, considering good practice at the point of decommissioning. These include, but not limited to: • Occupational health and safety measures e.g. PPE and statutory health and safety compliance in relation to ground gas from working in confined spaces or trenches; • Appropriate training of workers in the handling and use of potentially hazardous substances; • An awareness briefing regarding ground conditions and appropriate methods of working to limit disturbance of potentially contaminated soil or water, where practicable; • Measures to minimise exposure to contaminated soils e.g. by controlling dust generation and the adoption of PPE will prevent prolonged skin contact, inhalation, and ingestion of soils during decommissioning; • Measures to minimise and control runoff and/or leaching to controlled waters; • Any temporary dewatering activities during decommissioning would be undertaken in accordance with best practice guidance and would include appropriate assessment undertaken as required by the guidance; • Pollution prevention measures such as bunded storage, designated wheel washing areas, screening stockpiles of materials and dampening exposed soils as appropriate; and • A protocol for dealing within any unexpected contamination will be developed by the Contractor. • Decommissioning of the trenchless crossing beneath the peat would comprise either pulling of the cable only but leaving the ducting in place (i.e., no excavation works would be undertaken within the trenchless crossing) or not undertaking any decommissioning of the trenchless crossing.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Ground Conditions	Document Reference(s): Volume I Chapter 16 Section 16.3.5: The depth of cable installation as described could potentially be misleading to the reader – although the maximum depth stated is indeed likely to apply to the majority of the Proposed Development, it should be clarified that there would likely cable installation to greater depths locally where HDD is proposed.	Yes	Additional text has been added to Section 16.5.8 (equivalent of PEIR Section 16.3.5) to clarify that whilst the majority of the cable route would comprise shallow trenches, there will also be very limited (within the scale of the wider Proposed Development) areas of deeper HDDs.
Water Environment	Document Reference(s): Volume I Chapter 16 Table 16.2: For consultation response GWCL9 the Applicant states that a summary of the potential sources of contamination is included in Tables 16.10 and 16.11. This should presumably refer to Tables 16.11 and 16.12, as Table 16.10 provides a summary of surface water bodies within sub-sites and CRCs.	Yes	Correct. The corresponding table within **ES Volume 1, Chapter 16 - Ground Conditions [EN0110014/APP/6.1.16]** is Table 16.10.
Water Environment	Document Reference(s): Volume III Appendix 9.2 Water Framework Assessment Section 3.8.3: The Applicant proposes to Screen Out the Broadland Rivers Chalk and Crag WFD Groundwater body from further Water Framework Directive Assessment based on the relatively minor area of the site to be excavated, but that connection with groundwater would be assessed as part of surface water waterbody catchment assessment. We agree that the WFD Groundwater Body can be screened out of further assessment provided sufficient mitigation is provided and secured via the OCEMP, and subsequently CEMP, to prevent significant contaminative impact from occurring to the underlying Principal aquifer.	No	Mitigation measures for construction are outlined in **OCEMP [EN0110014/APP/7.1].**
Ground Conditions	Document Reference(s): Volume III Appendix 16.1 Ground Conditions Assessment Table 3.7, Table 5.3 and Section 3.4.17: The Applicant provides a list of the identified lithological units present on the component sub-Sites and CRC areas of the Proposed Development. This does not identify the	Yes	This point for consideration is assumed to relate to Table 3.1 of the GCA presented alongside the PEIR. The superficial and bedrock geology tables within **ES Volume 1, Chapter 16 - Ground Conditions [EN0110014/APP/6.1.16]** have been revised

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	indicated presence of Happisburgh Glacigenic Formation and Lowestoft Formation (Undifferentiated - Sand and Gravel) within sub-Sites 4A, 4B, 5A and CRC6 according to British Geological Survey mapping. The information presented in Table 3.7, 3.8 and 5.3 as appropriate, should be checked and updated as necessary. Section 3.4.7 states that the majority of the site is directly underlain by Diamicton at a thickness in excess of 10m and therefore it is unlikely that any large scale functional permeability through the Diamicton to the underlying Chalk and Crag Group Principal aquifers is present. Although the presence of low permeability Diamicton may be broadly true, BGS mapping of these deposits is often inferred. We note that existing ground investigation coverage of a significant proportion of the Proposed Development is of moderate, low and negligible sufficiency and therefore consider that this assumption should be supported with intrusive ground investigations as the design of the scheme progresses. Ground investigation may be particularly pertinent in areas in which foundation works are proposed (i.e. BESS and Substation developments) and HDD may require more thorough investigation of nearby site sensitivity or designations such as SPZs.		and the undifferentiated deposits of the Happisburgh Glacigenic Formation have been included as part of the Diamicton. As described within the **OCEMP [EN0110014/APP/7.1]** ground investigation will be undertaken post-consent and will inform the detailed design of the Proposed Development, including foundation and HDD design.
Water Environment	Document Reference(s): Volume I Chapter 9 Section 9.5.8: We welcome the Applicant's commitment to the use of PFAS-free Solar PV panels and the use of cables which do not inherently contain PFAS. We look forward to seeing further details of the proposed cable design, including whether PFAS may be present linked with associated components or	Yes	The Applicant welcomes this comment, PFAS will not be used in the manufacturing process of the Solar PV Arrays as detailed in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**. The Applicant will avoid the use of components that involve PFAS in their manufacturing in other components of the Scheme if there is a reasonable alternative.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	manufacturing steps. The Applicant should also seek to avoid PFAS coatings on batteries to be used at the BESS compound, as this would be at increased risk of release into the environment in the event of a fire both as airborne emissions and within firefighting runoff.		
Scheme Description	Document Reference(s): Chapter 5: Scheme Description: Certain elements of the infrastructure aspects will require a concrete base. Concrete is a known source of hazardous substances and its use in construction can pose a risk to water quality as. The risks of pollution from concrete should be managed through the Construction Environmental Management Plan, which is not yet available for review. Risk of pollution to water. Provide a draft Outline Construction Environmental Management Plan (OCEMP) for review and comment, to ensure that environmental risks, including those caused by the use of concrete, are adequately managed.	No	An **OCEMP [EN0110014/APP/7.1]** has been prepared to support the draft DCO Application. The CEMP describes the framework of mitigation measures to be followed and to be carried forward to a detailed CEMP prior to construction. The **OCEMP [EN0110014/APP/7.1]** will be used as the basis for the contractor to prepare a detailed CEMP prior to construction and following the detailed design of the Scheme. The Solar PV Arrays will be constructed on metal frameworks and with either metal pile foundations or metal screw foundations. Concrete and cement are not anticipated to be used in these elements, apart from a potential option to use concrete blocks as ballast for Solar PV mounting structures in an archaeologically sensitive areas (i.e., where it is desirable to not penetrate the ground) if present. These would be cured concrete blocks, not cast in-situ. Concrete and cement may be used to form the piled foundations (if these are found to be required) for the BESS and the 132kV and 400kV substations. The OCEMP will include a requirement for FWRA to be undertaken for any structures requiring deep foundations/piling. If piled foundations are found to be required, the FWRA(s) will be undertaken post-consent and will be informed by the results of the ground investigation. The detailed CEMP would be approved by Norfolk County Council following the grant of the DCO prior to the start of construction. It would identify the procedures to be adhered to and managed by the contractor throughout construction and would clearly define roles and responsibilities. Production of the detailed CEMP is secured through a requirement in Schedule 2 of the **draft DCO [EN0110013/APP/3.1]**.

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Water Environment	Document Reference(s): Chapter 5: Scheme Description and Chapter 9: Water Environment: Further details required about the locations of HDD. There is no draft drilling / bentonite breakout management plan. HDD, or other trenchless installation methods, and in particular the breakout of drilling muds, could have a significant impact on water quality. Para 5.2.64 Provide clarity to the statement "Both launch and reception pits will be a minimum distance of 10m from a watercourse", to ensure this is measured from top of bank. 5.2.63 We look forward to being able to review the Crossings Schedule which will provide further detail regarding the location of trenchless crossings. Carry out water quality monitoring upstream and downstream of proposed crossing sites to provide adequate baseline data. This would also provide evidence to ascertain that, post-decommissioning, the site has been returned to its pre-development state, or sufficiently improved. Provide an outline bentonite breakout plan as a supporting document to the Outline Construction Environmental Management Plan.	Yes	Trenchless crossings will be located in the areas marked as Avoidance Areas within the **Outline Cable Route Construction Statement [EN0110014/APP/7.21].** The trenchless installation methods will be confirmed post consent. A Hydrogeological Risk Assessment is a requirement of the CEMP and will ensure the use of bentonite is appropriately managed.
Water Environment	Document Reference(s): Chapter 5: Scheme Description, section 5.5.3: Issue: Compounds will include temporary hardstanding and wheel washing facilities. There is lacking information about how the pollution risks arising from activities at these locations will be managed. Impact: Risk of detrimental impact to water quality due to poor management of surface water runoff eg arising from wheel washing activities or vehicles parked on hardstandings.	Yes	Pollution management measures are addressed in **OCEMP [EN0110014/APP/7.1] OPEMP [EN0110014/APP/7.2]** and within the drainage strategy set out in **Appendix 9.1: Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Water Environment	Document Reference(s): Chapter 9: Water Environment, section 9.2.9: Section 9.2.9 says that "A minimum 9m buffer from IDB drains and a minimum 10m buffer for other watercourses that are not IDB maintained will be incorporated between infrastructure and watercourse top of banks." For consistency, and in line with other best practice, we would recommend the distance of 10m is also used for IDB drains. Risk that insufficient buffer distances are applied if there is lack of clarity on-site regarding a "ditch or minor watercourse" versus an "IDB drain".		Buffers have been amended to 10m for all watercourses. This is reflected in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**. This is secured within the **Design Principles Parameters and Commitments Register [EN0110014/APP/7.18]**
Water Environment	Document Reference(s): Chapter 9: Water Environment, section 9.2.12: We understand that "wastewater from welfare facilities will be contained within a septic tank and removed by tanker to an approved wastewater and sewage treatment centre", however further detail about wastewater management remain unknown. If wastewater is not managed correctly, it can increase the amount of nutrients, and other contamination, in receiving water courses and water bodies. This is especially important considering there are a number of Nitrate Vulnerable Zones within the sites. Details about wastewater removal from the welfare facilities are required.	Yes	The Applicant proposes wastewater to be stored on-site, with any wastewater generated from welfare facilities to be removed by tanker to an approved wastewater and sewage treatment centre. During the operational phase of the Scheme, this is likely to consist of a septic tank arrangement at a single onsite welfare facility. As such, no permanent connection to the wastewater network is proposed. Detail of wastewater handling is to be set out in the Site Waste Management Plan, which has been committed to through the **OCEMP [EN0110014/APP/7.1]** which is secured by requirement in Schedule 2 to the **Draft DCO [EN0110014/APP/3.1]**.
Water Environment	Consider if the sewage can first be discharged to public sewer. You should consult with the local water company to ensure that adequate sewer capacity is available, and no adverse effects will occur because of the connection. If this is not a viable option then this should be explained. Septic tanks may still require a permit if you intend to discharge sewage to ground. If the septic tank will not be discharging to ground, evidence of how any	Yes	The Applicant proposes wastewater to be stored on-site, with any wastewater generated from welfare facilities to be removed by tanker to an approved wastewater and sewage treatment centre. During the operational phase of the Scheme, this is likely to consist of a septic tank arrangement at a single onsite welfare facility. As such, no permanent connection to the wastewater network is proposed. Consultation with Anglian Water as the local water company has been undertaken on this matter.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	impacts will be mitigated during the removal of wastewater should be provided i.e. consider frequency of tanker removal and how the septic tank could accommodate wastewater in heavy rainfall events. If road transport to an offsite disposal facility is required, then there should be regard for this within the waste management procedures.		Detail of wastewater handling is to be set out in the Site Waste Management Plan, which has been committed to through the **OCEMP [EN0110014/APP/7.1]** which is secured by requirement in Schedule 2 to the d**raft DCO [EN0110014/APP/3.1]**.
Water Environment	Document Reference(s): Chapter 9: Water Environment, section 9.2.15 & 9.2.16: This section mentions impacts from the BESS, and from the National Grid substation, but does not include impacts from the smaller substations. The impacts of surface water runoff and the impacts from contaminated firewater from the smaller (non-National Grid) substations have not been scoped in and should be included in the final ES. Risk of pollution to the water environment. Include drainage from all substations in the ES. We acknowledge that it says that "further details such as the surface water drainage strategy and management plans in relation to fire water and construction surface water runoff management are not provided at this stage as the Scheme design is still being developed". We look forward to further discussions on drainage design and the opportunity to review detailed management documents as they are developed.	Yes	The impacts from all of the Project Substations is considered within **ES Volume 3, Appendix 9.1: Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** and the **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]**.
Water Environment	Document Reference(s): Chapter 9: Water Environment, section 9.5.7 and Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy, section 8.4.5: Additional measures taken from best practice and guidance should be incorporated to manage contaminated surface water and firewater from the BESS. Risk of pollution to the water environment.		This is considered within **ES Volume 3, Appendix 9.1 Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** and the **OBSMP [EN0110014/APP/7.5]**.
BESS	Chapter 9: Water Environment, section 9.5.7 states that firewater is proposed to be tankered from the	Yes	Section 4.3.2 of the **OBSMP [EN0110014/APP/7.5]** stipulates:

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	Site following a fire incident, if necessary. This is our preferred strategy, however, Appendix 9.1, section 8.4.5 mentions BESS surface water runoff with a controlled discharge to a nearby watercourse/ditch. The treatment and discharge of firewater would require a permit. Additional management practice/designs for the containment of firewater which could be integrated: A firewater containment area, possibly in the structure of a bunded lagoon, is recommended. An outfall from the firewater containment area to the site drainage system may be required to ensure the containment area does not fill up with rainwater, ensuring the containment area is empty and ready to accommodate fire water. Section 9.5.7 describes having “an auto shut-off valve that activates in the event of the fire alarms”. Please specify where this valve is located, i.e. on the firewater containment area to prevent discharge of firewater to the wider water environment. The containment area and drainage system would need to be cleaned after a firefighting event, before the valve from the containment area is reopened.		The BESS scheme will integrate an external firefighting water capture drainage system. In the event of a fire, a system of automatically self-actuating valves at the outfalls from the BESS area will be closed, isolating the BESS area drainage from the wider environment. Following any fire event, retained water within the isolated drainage and containment system will be sampled and analysed to determine the presence and concentration of contaminants. No discharge will occur until appropriate testing has been completed. Where contamination is identified, the retained water will be removed from site by tanker and transported to an appropriately permitted facility for treatment and disposal. Where testing confirms that water quality is suitable for release, discharge will take place in a controlled manner and only following consultation and agreement with the relevant statutory authority. Any discharge of retained water to a watercourse, groundwater or surface water sewer will be subject to the relevant regulatory regime in force at the time. Where required, an Environmental Permit or other applicable consent will be obtained prior to discharge. No release will occur without prior approval from the relevant regulator, and all actions will be undertaken in accordance with applicable environmental permitting and pollution control legislation. If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures, a dedicated water supply from separate water tanks and separate containment arrangement will be provided. Runoff from internal suppression systems has the potential to contain elevated pollutant concentrations and will therefore be managed independently of the external surface water system. Backflow prevention measures, including check valves or equivalent devices, will be incorporated to prevent contamination of potable water supplies in accordance with relevant regulations. Section 4.5.5 of the **OBSMP [EN0110014/APP/7.5]** stipulates: Outfalls from the BESS drainage system will be fitted with automatically actuated / penstock valves, which are connected to the BESS fire alarm system. In the event of a fire, these self-actuating / penstock valves will close, isolating the BESS drainage system and containing firewater runoff locally, the system will have a back-up manual shut off capability. Isolation controls shall be subject to a documented inspection, testing and maintenance regime. This shall include defined test frequency in the approved Battery Storage Safety Management Plan, an inspection checklist, record keeping of tests and inspections, defined remedial actions where

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			defects are identified, and an escalation procedure where a test failure is recorded. Section 4.5.8 of the **OBSMP [EN0110014/APP/7.5]** confirms: Following any fire event, retained water within the isolated drainage and containment system will be sampled and analysed to determine the presence and concentration of contaminants. No discharge will occur until appropriate testing has been completed. Where contamination is identified, the retained water will be removed from site by tanker and transported to an appropriately permitted facility for treatment and disposal. Where testing confirms that water quality is suitable for release, discharge will take place in a controlled manner and only following consultation and agreement with the relevant statutory authority. Any discharge of retained water to a watercourse, groundwater or surface water sewer will be subject to the relevant regulatory regime in force at the time. Where required, an Environmental Permit or other applicable consent will be obtained prior to discharge. No release will occur without prior approval from the relevant regulator, and all actions will be undertaken in accordance with applicable environmental permitting and pollution control legislation.
Water Environment	Document Reference(s): Chapter 9: Water Environment, section 9.5.11 and Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy, sections 8.4.3 and 8.8.5/8.8.5: It is unclear if the National Grid Substation will have its own area separate from the BESS, lined with impermeable membrane, to contain any contaminants that could be mobilised in the event of a fire. The drainage arrangements around the other substations do not appear to be adequate in the event of a substation fire, especially if they contain transformers that rely on oil as a cooling and insulating medium. Risk of pollution to the water environment from contaminated firewater.	Yes	The areas designated for the BESS and the National Grid Substation are shown on the Works Plans. The corresponding works numbers in Schedule 1 of the DCO explain clearly which works are intended for those works areas. This is considered within **ES Volume 3, Appendix 9.1 Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**. Transformer areas will be bunded to contain any oil leaks from their structures. Substations will have a surface water drainage system lined with an impermeable membrane
Other Environmental Matters	For your reference, we have included a number of management measures to	No	The Applicant acknowledges this advice and appropriate measures similar to those advised by the Environment Agency are included in the **OCEMP [EN0110014/APP/7.1]**.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	minimise the risk from fuel, oil and other chemicals associated with vehicles and/or storage. Where there are instances of either fuel, oil or chemicals being stored temporarily on Site, their containers should be stored within suitably bunded areas located on impermeable surfaces, a minimum of 10m from bank top for all watercourses or site drainage system to prevent leaching of contaminants. The containers and bunded areas should be covered, where possible, to prevent the accumulation of rainwater and to prevent accidental damage. Where fuel and oil are stored in these bunded areas on impermeable surfaces, an oil separator (interceptor), or other device to remove oil from water, may be required. If vehicle re-fuelling is required, could this be limited to designated re-fuelling areas away from sensitive receptors. The use of biodegradable oils and lubricants should be used, where practicable. All plant, vehicles and machinery will be inspected regularly for leaks and vehicle drip trays should be used. An emergency response plan and pollution prevention plan should be produced prior to construction activities commencing, this should include provisions such as spill kits.		
Water Environment	Document Reference: Appendix 9.3 – Water Resources Assessment (WRA): Section 2.3.5 describes groundwater (GW) sources as intended for supply to the area. It is unclear if this is in reference to the planned use of Anglian Water sources of supply (predominantly from Chalk in this supply zone) or intended new abstraction on site. New consumptive Groundwater abstraction in this catchment is closed to new abstraction. (This is	No	Due to new groundwater or surface water abstraction options have been scoped out due to the water scarcity in the region. This is outlined in **ES Volume 3, Appendix 9.3 Water Resources Assessment [EN011014/APP/6.3.9.3].**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	acknowledged in Vol 1 Chapter 9). If new (consumptive) GW abstraction is planned, there would be presumption of refusal. It is likely that more extensive modelling than that currently described in 2.3.5 would be required as evidence, in order to prove no unacceptable impacts.		
Water Environment	Non-consumptive abstraction – for example for dewatering may be possible if water is returned to the same source of supply via discharge. A Groundwater investigation consent would be issued as part of the permitting process in order to evaluate environmental impact including connected surface water features; risk of derogation to other licence holders or private water supplies.	No	Due to new groundwater or surface water abstraction options have been scoped out due to the water scarcity in the region. This is outlined in **ES Volume 3, Appendix 9.3 Water Resources Assessment [EN011014/APP/6.3.9.3].**
Water Environment	Document Reference(s): Volume 1 – Chapter 9 Water Environment; Appendix 9.3 – Water Resources Assessment (WRA): We commend the commitment to water efficiency and embedded mitigation to minimise the impact to water resources and the environment. However the impacts of water scarcity on the scheme itself are not considered. A number of options for supply to the project have been described which include groundwater (GW) abstraction and surface water (SW) abstraction. A review of the licensing strategy has been undertaken in chapter 9 of the main PEIR report and notes that there is no GW availability, which is closed to new abstraction. The practical implications of a GW licence being refused, or of SW abstraction being issued with conditions that restrict abstraction to high flow periods in the winter, have not been acknowledged fully. A fuller appraisal of sources of supply and specific implications should be provided with the ES which includes options such as Water company supply (e.g. limited by domestic use	Yes	The applicant has included an appraisal of all options in **ES Volume 3, Appendix 9.3 Water Resources Framework [EN011014/APP/6.3.9.3]**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	only); tankering (e.g. subject to numbers of HGVs on local roads); rainwater harvesting (e.g. subject to averages and seasonal variability) groundwater abstraction (e.g. prevented by licensing strategy); surface water abstraction (e.g. limited by high hands off flow conditions); on site storage (e.g volume requirement to meet demands outside of licence restriction) and licence trading might be something needed to be explored in the case that none of the above are practical.		
Water Environment	Document Reference(s): Appendix 9.3 – Water Resources Assessment (WRA): Section 2.3.8 lists some of the demands described in the previous Scoping report and the PEIR. However, some likely water demands are not listed here and it is unclear if the quantities specified refer to the use of water for dust suppression and HDD drilling fluids described elsewhere in the report. Risk that water demand could be significantly underestimated as these activities may require significant volumes of water compared to those listed. We would like to see a more detailed breakdown of demands to accompany the ES which itemises all consumptive activities.	No	The water demand outlined in **ES Volume 3, Appendix 9.3 Water Resources Assessment [EN011014/APP/6.3.9.3]** does not include an allowance for dust suppression and HDD drilling fluids. This will be supplied by the contractor, who will be supplying Bore-Gel and EZ Mud as outlined in the **Outline Cable Route Construction Statement [EN0110014/APP/7.21]**
Water Environment	Document Reference(s): Appendix 9.3 – Water Resources Assessment (WRA): Section 2.3.6 specified quantities of water required for the various phases of the development. The units for these figures may be incorrect. The stated average water requirements of c.40Mld per phase (construction, operation, decommission) equates to 40,000m3 per day. This seems disproportionately high for a solar project. We would like to see a more detailed breakdown of quantities estimated to accompany the ES. The breakdown should itemise	No	The applicant has revised the water requirements of the scheme as part of **ES Volume 3, Appendix 9.3 Water Resources Assessment [EN0110014/APP/6.3.9.3]** and included a breakdown of the consumptive activities.

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	all consumptive activities and confirm total water requirements.		
Water Environment	A number of permits and licenses may be required to facilitate this scheme. Should you wish to disapply any element of these proposals and bring within the scope of the Development Consent Order (DCO) details of this should be provided to the Environment Agency a minimum of 6 months prior to DCO submission. We will require a consenting strategy document to be submitted in support of the proposals which outlines what consents are required and a programme of managing the various consents and permits, and confirmation of whether this will be subsumed within the DCO process or as standalone permits. We recommend early engagement with our National Permitting Service (NPS) and full use of their enhanced pre-application advice service to ensure the permitting requirements and implications are fully understood and addressed in good time to inform the Planning Inspectorate (PINS) decision making process. Twin tracking is recommended for those applications considered fundamental to the DCO. The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place: on or within 8 metres of a main river (16 metres if tidal) on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal) on or within 16 metres of a sea defence	No	Due to new groundwater or surface water abstraction options have been scoped out due to the water scarcity in the region. This is outlined in **ES Volume 3, Appendix 9.3 Water Resources Assessment [EN011014/APP/6.3.9.3].** The Applicant is seeking to disapply Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016 in respect of a flood risk activity only. The Applicant has included protective provisions for the benefit of the EA in the draft DCO and will engage with the EA to seek to agree the form of protective provisions. The permits/licenses that will or may be required are outlined in the **Consents and Agreements Position Statement [EN0110014/APP/7.22]**.

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	involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert on the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission The proposals may require Water Resource Licences in respect of the construction activities required. Advice on regulated activities and licence requirements is given below. Water Resource (Impoundment and Abstraction) Licences are issued by the Environment Agency under the terms of the Water Resources Act 1991 and the provisions of the Water Resources (Abstraction and Impounding) Regulations 2006. No other Environment Agency administered Regulatory Regime provides consent to create or modify an impoundment and / or abstracted water at volumes greater than 20m3/day. You should seek to fully understand the permissions required for your proposal and not assume consent for abstraction and impoundment activity is provided by other regulatory documents. If dewatering is required, you may require an abstraction licence if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. If you do not meet the exemption and requires a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. Please note		

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	that the typical timescale to process a licence application is 9-12 months. You may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning. If you intend to impound a watercourse then you are likely to need an impounding licence from the Environment Agency. An impoundment is any dam, weir or other structure that can raise the water level of a water body above its natural level. 'On-line' impoundments hold back water in rivers, stream, wetlands and estuaries, and consequently affect downstream flows, sediment transport and migration of fish. Impoundments could be created through works to modify or change existing watercourses. An Impoundment Licence could also be required if you amend, modify or remove existing in channel structures. Effluent discharged from any premises carrying on a trade or industry and effluent generated by a commercial enterprise where the effluent is different to that which would arise from domestic activities in a normal home is described as trade effluent. If you are not able to discharge effluent, it will be classed as waste, and you must then comply with your duty of care responsibilities. If you wish to discharge effluent, after appropriately treating it, to groundwater or surface water a permit under the Environmental Permit Regulations will be required. Full characterisation of the effluent will be required, and modelling may		

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	be required at the planning stage to determine the impact of the effluent on the receiving watercourse. A trade effluent consent or a trade effluent agreement with your water and sewerage company must be obtained before you discharge trade effluent to a public foul sewer or a private sewer that connects to a public foul sewer. You do not require a permit if you are only discharging uncontaminated surface runoff. If you intend to discharge to surface water for dewatering purposes, this may be covered by a Regulatory Position Statement (RPS) for water discharge activities. If you can comply with all the conditions within the RPS, then a permit is not required for this activity. If any discharges do not fully comply with the RPS, then a bespoke discharge permit will be required.		
Other Environmental Matters	Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.	Yes	The Applicant confirms is commitment to reuse of contaminated soils and stone onsite wherever feasible in compliance with the CL:AIRE Code of Practice. The **OCEMP [EN0110014/APP/7.1]** commits to ensuring all contaminated materials are characterised and separated onsite. No on-site treatment is proposed, and as such, all hazardous or contaminated waste will be handled by an authorised carrier and a suitably qualified contractor, before being transported to approved, licensed third-party waste facilities for recycling or disposal.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	The Environment Agency recommends that developers should refer to our: Position statement on the Definition of Waste: Development Industry Code of Practice and;		
Other Environmental Matters	Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes: Duty of Care Regulations 1991 Hazardous Waste (England and Wales) Regulations 2005 Environmental Permitting (England and Wales) Regulations 2010 The Waste (England and Wales) Regulations 2011 Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer.	Yes	The **OCEMP [EN0110014/APP/7.1]** commits to ensuring all contaminated materials are handled, separated and treated in accordance with legislation and industry good practice guidance. No on-site treatment is proposed, and as such, all hazardous or contaminated waste will be handled by an authorised carrier and a suitably qualified contractor before being transported to approved, licensed third-party waste facilities for recycling or disposal.
Other Environmental Matters	The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes.	Yes	The **OCEMP [EN0110014/APP/7.1]** commits to production of a Site Waste Management Plan (SWMP) before construction begins. It will also outline the aims, objectives, and ongoing management responsibilities, including practices for management and storage, and set targets for waste reduction, landfill diversion,

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	The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales. The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it.		and reuse. Once appointed, details of the waste carriers and contractors for the Scheme, along with copies of their appropriate licenses, will be included in the SWMP.
Other Environmental Matters	In order to meet your objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood based products) may be either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments. Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility.	Yes	The **OCEMP [EN0110014/APP/7.1]** commits to production of a Site Waste Management Plan (SWMP) before construction begins. These measures include the separation of main waste streams on-site before transport to approved, licensed third-party waste facilities for recycling or disposal.
Other Environmental Matters	If materials that are potentially waste are to be used on-site, you will need to ensure you can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc…' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply. Where you cannot meet the criteria, you will be required to obtain the appropriate waste permit or exemption from us. A deposit of waste to land will either be a disposal or	Yes	The Applicant confirms is commitment to reuse of contaminated soils and stone onsite wherever feasible in compliance with the CL:AIRE Code of Practice. No on-site treatment or long-term waste storage is proposed on the Scheme, and as such, all materials considered to be waste will be handled by an authorised carrier and a suitably qualified contractor, before being transported to approved, licensed third-party waste facilities for recycling or disposal.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as: any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. We have produced guidance on the recovery test		
Other Environmental Matters	The developer must apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Site Waste Management Plans (SWMP) are no longer a legal requirement, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice.	Yes	The Applicant is committed to applying the waste hierarchy, which is secured through the **OCEMP [EN0110014/APP/7.1]**, both explicitly, and through commitment to production of a Site Waste Management Plan (SWMP) before construction begins. This is secured by requirement in Schedule 2 to the **draft DCO [EN0110014/APP/3.1]**.
Other Environmental Matters	Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in PAS402: 2013, or an appropriate equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations. Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the WFD). The 'Is it waste' tool, allows you to make an assessment.	Yes	The **OCEMP [EN0110014/APP/7.1]** commits to production of a Site Waste Management Plan (SWMP) before construction begins. These measures include the separation of main waste streams on-site before transport to approved, licensed third-party waste facilities for recycling or disposal. Furthermore, the **OCEMP [EN0110014/APP/7.1]** commits to production of a Construction Resource Management Plan (CRMP) by the appointed contractor, outlining the strategic approach to planning, coordinating, and managing the labour, materials and equipment. All waste management in connection with the Scheme will be undertaken in accordance with the most up-to-date legislation and industry guidance.

1.21 Natural England

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Ecology and biodiversity	Impact pathways where LSE cannot be screened out for Norfolk Valley Fens Special Area of Conservation (SAC), Broadland Ramsar, Broadland Special Protection Area (SPA), and The Broads SAC.	Yes	Given the lack of hydrological and air pollution (deposition) impact pathways between the Scheme and the above International/European sites, no direct effects associated from air quality impacts and hydrological impacts are anticipated, and the resulting magnitude of impacts is negligible, resulting in a Negligible effect which is not significant. This is assessed in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]** and considered further in the **Shadow Habitat Regulations Assessment (SHRA) Report [EN0110014/APP/7.25].**
Water environment	If likely significant effects (LSE) of the water quality impact pathway can be screened out, this should be recorded. If LSE cannot be screened out, further assessment is required as part of the appropriate assessment stage.	Yes	Potential impacts to designated sites from pollution mobilisation from the BESS and Substation elements of the Scheme have been scoped in and are assessed in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9].**
Water environment	Broadland Ramsar, Broadland SPA and The Broads SAC and potential hydrological impacts. Natural England supports that these sites will remain scoped in for hydrological impacts.	No	The Applicant has included a Hydrological Connectivity Assessment within **ES Volume 3 Appendix 9.1 Flood Risk Assessment and Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Ecology and biodiversity	Avian impact for Broadland Ramsar, Broadland SPA and The Broads SAC. Natural England agrees the risk of impact can be scoped out of further assessment. However, we advise that full justification and evidence is given to screening this out of the Habitat Regulations Assessment (HRA).	Yes	The Applicant makes note of this comment and has provided a full justification and evidence given to screening this out in the Habitat Regulations Assessment in **ES Volume 1 Chapter 8 - Ecology and Biodiversity [EN01100014/APP/6.1.8].**
Ecology and Biodiversity	Impacts from the development on the features designated for Shotesham-Woodton Hornbeam Woods Site of Special Scientific Interest (SSSI) and Pulham Market Big Wood SSSI. Natural England advise that the SSSI assessment for these designated sites includes an assessment of air and water quality impacts to the site's features. Impacts from the development on the	Yes	The Scheme has been designed to avoid all direct impacts to statutory designated sites. The design principles for the Scheme are set out in the **Design Principles, Parameters and Commitments document [EN011014/APP/7.18]** document which includes a series of environmentally led design principles, including in relation biodiversity. This includes restricting development in ecologically sensitive locations and applying appropriate offsets and buffers from important ecological receptors including the adherence to a minimum of 30m buffer from Shotesham-Woodton Hornbeam Woods SSSI.

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	features designated for Fritton Common SSSI. Natural England advise that the SSSI assessment includes an assessment of water quality impacts to features of Fritton Common SSSI.		The following statutory designated sites have identified in the **ES Vol 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy** as having hydrological connectivity to the Order Limits. They have the potential to be impacted by the Scheme through the mobilisation of contaminants to surface water and groundwater receptors without appropriate mitigation during all phases of the Scheme: • Shotesham Woodton Hornbeam Woods SSSI; • Hedenham Wood SSSI; • Fritton Common and Pulham Market SSSIs; • Shotesham Common SSSI; • Tindall Wood Ditchingham SSSI; and • Smockhill Common LNR.
Construction and decommissioning	Guidance document supporting CEMP. Natural England welcomes reference to BS5837:2012 Trees in relation to design, demolition and construction.	No	The Applicant welcomes this comment.
Landscape and visual	Natural England supports the soft landscape planting to provide connectivity with SSSIs around the site.	No	The Applicant welcomes this comment.
Landscape and visual	Natural England advise that 15m is considered a minimum buffer. This should be reflected in the Landscape and Environment Management Plan (LEMP), and we would advise providing evidence of applying Natural England's standing advice on working around ancient woodland, ancient trees and veteran trees.	Yes	**The Design Approach Document [EN0110014APP/7.17]** defines the minimum offsets and buffers from existing features within Table 3.2, including a minimum offset of 15m from trees. **ES Volume 3, Appendix 7.10 Preliminary Arboricultural Impact Assessment (AIA) [EN0110014/APP/6.3.7.10]** identifies a total of 737 tree features and that the majority of the tree resource which are located within the Order Limits will be protected during construction and operation of the Scheme. A total of 70 ancient or veteran trees within or adjacent to 15m of the Order Limits, consisting of 56 individual trees identified during the survey as ancient or veteran trees and 14 individual trees designated as ancient or veteran in the Ancient Tree Inventory. The Scheme will avoid the buffer zones (15 times larger than the stem diameter of the tree, or 5 metres from the edge of the tree's canopy, whichever

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			is greater) of all ancient or veteran trees identified within or adjacent to the Order Limits.
Ecology and Biodiversity	Buffers between ancient woodland parcels: Clarity is needed on buffer zones as reference is made to 15m and 30m.	Yes	The Scheme has been designed to avoid all direct impacts to Ancient Woodland parcels, with the 30m buffer zones set out in the **Design Parameters and Design Principles [EN011014/APP/7.18]** being retained and enhanced through sympathetic management practices detailed within the **OLEMP [EN0110014/APP/7.4].**
Ecology and biodiversity	Natural England commends the intention to include the delivery of a quantifiable BNG.	No	The Applicant welcomes this comment. Further details on the potential impacts of the scheme, including contributions to Biodiversity Net Gain (BNG), are set out in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8],** and supported by the **Biodiversity Net Gain Report [EN0110014/APP/7.23]**.
Water environment	Natural England welcome the intention to undertake a hydrological assessment as part of the Flood Risk Assessment (FRA).	No	The Applicant welcomes this comment.
Soils and agriculture	We welcome the additional ALC survey work that is being undertaken. We advise that they should be more detailed and cover the whole area of the draft order limits. Where Best and Most Versatile (BMV) land is identified and where proposed permanent infrastructure will be sited, 1 auger per hectare (plus representative pits), should be used.	No	These comments are noted. All the area within the Order Limits, except for the cable route corridor, has been surveyed at this density. The CRC has not been surveyed, but the works will involve a narrow trench and will be short term and fully reversible. The Applicant commits to survey the CRC pre-entry and to restore the narrow areas trenched to the comparable ALC grade after cables have been inserted. This will be secured through the **Outline Soil Resource Management Plan (OSRMP) [EN0110014/APP/7.9]** has been submitted as part of the **draft DCO [EN0110014/APP/3.1].** This is evidenced in **ES Volume 3, Appendix 15.1: Agricultural Land Classification [EN0110014/APP/6.3.15.1]**.
Soils and agriculture	Clarify if peat soils have been identified and if they have been found within the draft order limits, these areas should be avoided.	No	This is covered in the Agricultural Land Classification and **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15]**. No peat has been found.
Soils and agriculture	We support the applicant's commitments to providing an outline Soil Management Plan (oSMP) or an	Yes	The Applicant welcomes this comment.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	Outline Soil Resources and Management Plan (oSRMP), as part of the development consent order (DCO).		An **OSRMP [EN0110014/APP/7.9]** has been submitted as part of the **draft DCO [EN0110014/APP/3.1].**
Soils and agriculture	Natural England recommends the inclusion of rainfall criteria for handling in the soil handling strategy, which includes stop work criteria.	No	This rainfall criteria is included in the **OSRMP [EN0110014/APP/7.9]** as above.
Soils and agriculture	Natural England advise that the ALC survey data is used to ensure the soil is restored to its baseline condition (i.e. the soil profile as described during the ALC survey).	No	Detailled ALC has been completed and the Applicant commits to restoration to comparable ALC grade of any areas affected by physical works, such as cabling and infrastructure bases. This will be secured through a Soil Management Plan: an **OSRMP [EN0110014/APP/7.9]** has been submitted as part of the **draft DCO [EN0110014/APP/3.1].** This is evidenced in **ES Volume 3, Appendix 15.1: Agricultural Land Classification [EN0110014/APP/6.3.15.1]**
Soils and agriculture	Natural England welcome that a Cumulative and In-Combination Effects Assessment has been undertaken, which we will review as iterations become available.	No	The Applicant welcomes this comment.
Ecology and Biodiversity	The application site is in close proximity to European designated sites (also commonly referred to as Natura 2000 sites) and therefore has the potential to affect their interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations').	Yes	No international/European designated sites for nature conservation are present within the Order Limits. Internationally/European designated sites present within 10km of the Order Limits are described in Table 8.7 of **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**. Further detailed information regarding site descriptions and qualifying criteria is provided within **ES Volume 3, Appendix 8.1**. **Ecological Desk Study and Extended Habitat Survey [EN0110014/APP/6.3.8.1].**
Ecology and biodiversity	Paragraph 8.1.13 Chapter 8, Ecology and Biodiversity, Page 18 states that Likely Significant Effect (LSE), will be considered in a shadow Habitat Regulations Assessment (HRA) screening report, and if required a Shadow Appropriate Assessment report. This will	Yes	The Applicant welcomes Natural England's comments on the HRA. **Shadow Habitats Regulations Assessment [EN0110014/APP/7.25]** is provided as part of this Application.

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	be submitted as part of the DCO application. Natural England will provide comment on the HRA when it is available to review.		
Water environment	Norfolk Valley Fens SAC is located 7.4km north-west. Flordon Common is a component site of the Norfolk Valley Fens SAC and is 2.4km north-west of sub-Site 4A. The feature may be sensitive to changes in water quality. In our previous response (our ref 499672, dated 10 February 2025), we advised that impacts on water quality will need to be assessed as the proposed development may be hydrologically connected to the SAC.	Yes	An assessment of hydrological connectivity has been undertaken and set out in **ES Appendix 9.1 Flood Risk Assessment and Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Ecology and biodiversity	Table 8.4, Chapter 8, page 26 states that work is currently underway to establish hydrological linkage and detailed assessment of this will be included within the Environmental Statement (ES). Natural England advise that construction methods used in watercourse crossings are assessed for their impact on water quality.	No	An assessment of impacts upon watercourse crossings is provided within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8].**
Reasonable alternatives and design evolution	The Cable Route Corridor (CRC) cables will be retained in-situ beneath the ground during the operational period and following the decommissioning period and disturbance is unlikely to occur. Natural England agrees that the assessment of impacts in relation to the CRC during these periods can be scoped out. (table 8.3, Chapter 8, page 22). Please refer to our more detailed comments on soil management during the decommissioning phase in paragraph 8.3.6 of this letter.	No	The Applicant welcomes this comment and addresses the detailed comments below.
Water environment	There are five parcels of land that are within 10km of the Broads SAC and Broadland Ramsar. There are also several water courses in close proximity of the site. Natural England previously advised (our ref 499672, dated 10 February 2025) that further assessment is required to determine if the 5 parcels are hydrologically linked to the SAC and Ramsar.	Yes	An assessment of hydrological connectivity has been undertaken and set out in **ES Volume 3, Appendix 9.1 Flood Risk Assessment and Drainage Strategy [EN0110014/APP/6.3.9.1].** This concludes that the Broads SAC and Broadland Ramsar are located at a significant distance away from or topographically above the Scheme, and as such they would not be impacted by the Scheme.

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Water environment	Consideration should also be given to any possible effects of the cable works upon watercourses linked to the SAC and Ramsar (e.g. methodology used for watercourse crossings). Table 8.4 page 26 states that these sites will remain scoped in for hydrological impacts which Natural England supports.	Yes	Cable works will be trenchless crossings in Avoidance Areas or open trench in other locations with ground reinstated to existing level post installation. Further information is set out in **ES Volume 3, Appendix 9.1 Flood Risk Assessment and Drainage Strategy [EN0110014/APP/6.3.9.1].** The details of the cable route will be confirmed at the detailed design stage, as secured through the **OCEMP [EN0110014/APP/7.1].**
Ecology and biodiversity	Avian impact has been scoped out of the construction, operational and decommissioning phases as qualifying mobile species populations SPA/Ramsar (namely Whooper swan and Bewick's swan), are considered highly unlikely to regularly utilise habitats within and surrounding the Sites, due to unsuitable topography, and separation distance. (table 8.3 page 22). There are expansive areas of low-lying floodplains associated with the Yare and Chet catchments within and immediately surrounding the SPA/Ramsar site. Natural England agrees the risk of impact is relatively low and can be screened out from further assessment. However, we advise that full justification and evidence for this conclusion is provided in the HRA.	Yes	This comment is welcomed by the Applicant. **A Shadow Habitats Regulation Assessment [EN0110014/APP/7.25]** has been submitted with this Application. Justification and evidence for this conclusion has been provided in the sHRA; It is considered likely that the small numbers of Bewick's swans that overwinter in Norfolk would choose to roost and forage in more optimal habitats than those within the Order Limits, especially considering the undulating topography of the land. Accordingly, it is considered highly unlikely that the Scheme would have any impact on the distribution of Bewick's swan nor undermine the conservation objectives of the European Sites in respect of this qualifying species. Additionally, it is considered likely that the Whooper swans that overwinter in Norfolk would choose to roost and forage in more optimal habitats than those within the Order Limits, especially considering the undulating topography of the land. Accordingly, it is considered highly unlikely that the Scheme would have any impact on the distribution of Whooper swan nor undermine the conservation objectives of the European Sites in respect of this qualifying species.
Ecology and biodiversity	It is noted that the nationally designated sites listed above have been listed in Table 8.11 Chapter 8 page 41. Natural England advise that the ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.	No	An assessment of direct and indirect impacts upon statutory designated sites is provided within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8].** The Scheme has been designed to avoid all direct impacts to statutory designated sites. The design principles for the Scheme are set out in the **Design Principles, Parameters and Commitments [EN011014/APP/ 7.18]** document which includes a series of environmentally led design principles, including in relation biodiversity. This includes restricting development in ecologically sensitive locations

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			and applying appropriate offsets and buffers from important ecological receptors including the adherence to a minimum of 30m buffer from Shotesham-Woodton Hornbeam Woods SSSI. The O**CEMP [EN0110014/APP /7.1]** and the **Outline Cable Route Construction Statement [EN0110014/APP/7.21]** ensure that sufficient embedded mitigation is in place and that the above-mentioned SSSI buffer zones adhered to during construction, so that any residual construction related disturbance, degradation, fragmentation, and habitat loss effects upon SSSI parcels will be avoided are not significant.
Ecology and biodiversity	Shotesham-Woodton Hornbeam Woods SSSI is adjacent to sub-Sites 7F, 7G, 7H and CRC8, and Pulham Market Big Wood SSSI is located adjacent to CRC4. (paragraph 8.4.4 page 40). Fritton Common SSSI is also in an Impact Risk Zone. The other 7 SSSI's are located within 5km of the site but do not trigger Impact Risk Zones.	No	This is noted by the Applicant. All 11 SSSIs within 5km of the Order Limits are assessed within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8].**
Ecology and biodiversity	This site consists of a group of four ancient coppice-with-standards woodlands. There are variations in the acidity and drainage of the soils and these differences are reflected in the range of stand-types and in the ground flora. A condition assessment of the SSSI records that 82.38% of the site is in unfavourable recovering condition and 17.62% is in unfavourable no change.	No	This is noted by the Applicant. This has been factored into the relevant assessments.
Ecology and biodiversity	Pressures to the site include invasive non-native species and hydrological pollution. Information needs to be provided in the ES to determine if there is hydrological connectivity to the SSSI.	Yes	An assessment of hydrological connectivity in relation to SSSI has been undertaken and it is concluded that there is hydrological connectivity. This is set out in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**. Impacts from the Scheme have been assessed in the mentioned document for: Shotesham Woodton Hornbeam Woods SSSI; Hedenham Wood SSSI; Fritton Common and Pulham Market SSSIs; Shotesham Common SSSI; Tindall Wood Ditchingham SSSI; and Smockhill Common LNR.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Air quality	An assessment of air quality impacts from construction traffic should also be included in the ES.	No	A full assessment of the potential impacts on air quality as a result of the construction phase of the Scheme has been undertaken and set out in **ES Volume 1, Chapter 13 Air Quality [EN0110014/APP/6.1.13]**.
Water Environment	Pressures for the site include abstraction and water pollution and therefore information needs to be provided in the ES to determine if there is hydrological connectivity to the SSSI as well as air pollution impacts from construction traffic	Yes	Statutory designated sites have been identified in the **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** as having hydrological connectivity to the Order Limits. These include: Shotesham Woodton Hornbeam Woods SSSI; Hedenham Wood SSSI; Fritton Common and Pulham Market SSSIs; Shotesham Common SSSI; Tindall Wood Ditchingham SSSI; and Smockhill Common LNR.
Soils and agriculture	Fritton Common is one of only a few large grassy commons remaining in south Norfolk still under traditional management by light cattle grazing. The site forms an excellent example of the locally uncommon damp acidic grassland habitat developed over loess soils. Pressures to the site include freshwater impacts including extraction and is in an Impact Risk Zone for underground pipes and cables.	No	This is noted by the Applicant.
Water environment	Hydrological connectivity to the SSSI needs to be ascertained and included in the ES to determine impact.	Yes	An assessment of hydrological connectivity has been undertaken and set out in **ES Volume 3, Appendix 9.1 Flood Risk Assessment and Drainage Strategy [EN0110014/APP/6.3.9.1].** The assessment concludes that several SSSIs and Ancient Woodlands in the Study Area (5km from Order Limits) are hydrologically linked to the watercourses/aquifers within the Order Limits**.**
Air quality	The impact from construction dust emissions on local air quality were scoped out of the Air Quality assessment for the PEIR and ES via the scoping process. Natural England supports that a Construction Dust Risk Assessment has been included in Appendix 13.1 to identify the appropriate mitigation measures for inclusion in the Outline Construction Environmental Management Plan (OCEMP) and Outline Decommissioning Environmental Management Plan	No	An updated dust risk assessment and mitigation measures are provided in **ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [EN0110014/APP/6.3.13.1]** and secured within the **OCEMP [EN0110014/APP/7.1].**

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	(ODEMP), both of which will accompany the DCO Application.		
Landscape and visual	It is noted in paragraph 8.7.95 that a minimum of 15m buffer zones will be implemented to protect ancient woodland habitat. As detailed in our standing advice and as advised in our EIA scoping advice letter, 15m is considered a minimum buffer. Please refer to our standing advice for detailed recommendations on buffer zones when working around ancient woodlands, which includes advice on when a larger buffer area should be adopted.	Yes	The Applicant makes note of this comment. Further to review of the standing advice, the minimum offset to protect ancient woodland is ow 30m, as detailed in **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]**. Habitat enhancement and landscape mitigation within the buffer areas are presented in and the **OLEMP [EN0110014/APP/7.4]**.
Landscape and visual	Natural England supports the adherence to BS5837:2012 Trees in relation to design, demolition and construction and current guidance provided by NE and the soft landscape planting integrated within the Scheme designs to enhance ecological connectivity between Ringers Grove (paragraph 8.7.96).	No	The Applicant welcomes this comment.
Landscape and visual	Natural England note that good practice measures will be detailed in a LEMP, which will also include management of habitat buffers to strengthen habitat connectivity between the ancient woodland parcels and wider landscape (paragraph 8.7.102, page 79). However, clarity is needed with regards to the buffer areas that have been referenced. It is noted that for some woodland sites such as Shotesham-Woodton Hornbeam Woods SSSI, a 30m buffer will be implemented, whilst for other ancient woodland sites it will be a minimum of 15m. As advised in paragraph 3.2.2. of this letter, please refer to our standing advice for detailed recommendations on buffer zones when working around ancient woodlands.	No	The Applicant makes note of this comment. Further to review of the standing advice, the minimum offset to protect ancient woodland is now 30m, as detailed in **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]**. Habitat enhancement and landscape mitigation within the buffer areas are presented in and **OLEMP [EN0110014/APP/7.4]**.
Ecology and biodiversity	In Natural England's Environmental Impact Assessment Scoping advice letter (dated 10 February 2025, our ref: 499672), we referred the Applicant to our Standing advice for protected species which includes guidance on survey and mitigation measures.	Yes	The comments provided by Natural England have been considered by the Applicant as detailed in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8].**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	We advised that the ES should assess the impact of all phases of the development on protected species and where records can be obtained.		The ES has assessed the impact of all phases of the development on protected species.
Ecology and biodiversity	Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.	No	Priority habitats (as mapped on the Multi-Agency Geographic Information (MAGIC) website) are provided in **ES Volume 2, Figure 8.5 - Priority Habitats [EN0110014/APP/6.2.8.5].** Given that embedded measures to protect field boundary features (ditches and hedgerows) which also serve to protect arable field margins, will be incorporated into the Scheme during the construction phase, and additional habitat creation measures (within retained arable parcels) embedded into the Scheme design, the magnitude of impacts for priority habitats is therefore considered to be negligible, resulting in a Negligible effect, which is considered not significant.
Reasonable alternatives and Design Evolution	Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.	Yes	An assessment was carried out to identify brownfield land, industrial land, previously developed land, and low-grade agricultural land for use within the Scheme, in accordance with policy. As set out in the **Site Selection Assessment Report [EN0110014/APP/7.20]** the assessment to identify previously developed land found that there were no previously developed land sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or cumulatively.
Ecology and biodiversity	A list of Priority Habitats has been included in the PEIR report paragraph 8.7.109. Mitigation and enhancement measures have been included and will be detailed within the LEMP, CEMP, OOEMP (Outline Operation Environmental Management Plan), and ODEMP (Outline Decommissioning Environmental, Management Plan). Natural England will provide comment on the management plans when they are available for review.	No	Natural England's engagement with the mentioned documents is welcomed by the Applicant. The following documents can be found accompanying this application: • **Outline LEMP [EN0110014/APP/7.4]** • **Outline CEMP [EN0110014/APP/7.1]** • **Outline OEMP [EN0110014/APP/7.2]** • **Outline DEMP [EN0110014/APP/7.3]**
Ecology and biodiversity	It is acknowledged in paragraph 8.84 of the PEIR that protected species licences from Natural England or	No	This is noted by the Applicant.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	Defra may be required. Applicants should refer to the guidance at Wildlife licences: when you need to apply to check to see if a mitigation licence is required. Via our DAS, Natural England can review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. See Annex C – Natural England and the Planning Inspectorate for details of the LONI process.		The Applicant intends to comply with all relevant licence measures via Natural England or Defra, where appropriate.
Ecology and biodiversity	We advised the Applicant to commit to an uplift of at least 10% BNG across habitat, river and hedgerow units, illustrated via the use of the statutory biodiversity metric. We also advised that the Local Nature Recovery Strategies (LNRS), a new mandatory system of spatial strategies for nature established by the Environment Act 2021, could provide opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience. Since our previous advice was provided, there was a consultation seeking views on the implementation of BNG for NSIPs. This detailed that the proposed introduction of BNG for NSIPs has now moved to May 2026. We reiterate that Natural England would encourage the Applicant to commit to at least 10% BNG across habitat, river and hedgerow units.	Yes	The Applicant can confirm that the BNG assessment has identified that for the Order Limits of the Scheme, based on the baseline habitat surveys and the Hedgerow Removals Plan and Green Infrastructure Strategy within the **OLEMP [EN0110014/APP/7.4]** together with the assumptions described in this assessment, the Scheme is able to deliver the following predicted change of biodiversity units: • 37.42% (1,128.63 units) gain for habitats; • 31.35% (290.03 units) gain for hedgerows; and, • 16.08% (16.65 units) gain for watercourses Local Nature Recovery Strategies (LNRS) have been considered, as established by the Environment Act 2021, including the Norfolk LNRS (published in October 2025) in the **Biodiversity Net Gain Report [EN0110014/APP/7.23]**. At the time of the submission of the Application, a decision had not been made about the future BNG consideration for DCOs. There is currently no requirement for DCOs to submit a BNG assessment. However, this BNG assessment has been undertaken to demonstrate the Scheme does provide a net benefit for the biodiversity in accordance with NPS Policy EN-1.
Ecology and biodiversity	We note in chapter 8 paragraph 8.3.19 that for the purposes of impact assessment, the delivery of a quantifiable BNG will be considered as an inherent part of the Scheme.	No	The Applicant makes note of this comment. Further details on the potential impacts of the scheme, including contributions to Biodiversity Net Gain (BNG), are set out in **ES Volume 1, Chapter 8 - Ecology**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			and Biodiversity [EN0110014/APP/6.1.8], and supported by the **Biodiversity Net Gain Report [EN0110014/APP/7.23]**.
Ecology and biodiversity	We recommend that developers use the latest version of the Defra biodiversity metric to calculate BNG and adhere to the rules and principles set out within the metric guidance.	Yes	As detailed in **Biodiversity Net Gain Report [EN0110014/APP/7.23]** the following guidance has been used when undertaking the latest Metric calculations: • Statutory biodiversity metric calculation tool (Version 1.0.3) • Statutory biodiversity metric: user guide (July 2025); and • Statutory biodiversity metric condition assessments (July 2025).
Water environment	In Natural England's Environmental Impact Assessment Scoping advice letter (dated 10 February 2025, our ref:499672), we advised that the ES should assess the potential of any water bodies within the draft order limits being hydrologically linked to designated sites. The assessment should take account of the risks of water pollution and how these can be managed or reduced. Designated sites have the potential to be impacted by the Scheme through the mobilisation of contaminants to surface water and groundwater receptors without appropriate mitigation during all phases of the Scheme. (Appendix 9. paragraph 9.1.10). If there is a hydrological link to designated sites, then impacts to water quality should be further assessed as part of the appropriate assessment. Natural England welcome the intention to undertake a hydrological assessment as part of the Flood Risk Assessment (FRA). Should it be necessary, this assessment will use watercourse locations and Light Detection and Ranging (LiDAR) (for both topography and groundwater flow). (Table 9.2, page 10). Potential changes to water quality resulting from the BESS and National Grid Substation will specifically be considered. Natural England will review this once it has been completed. We reiterate that impacts to	Yes	An assessment of hydrological connectivity has been undertaken and set out in **ES Volume 3, Appendix 9.1 Flood Risk Assessment and Drainage Strategy [EN0110014/APP/6.3.9.1].** The assessment concludes that several SSSIs and Ancient Woodlands in the Study Area (5km from Order Limits) are hydrologically linked to the watercourses/aquifers within the Order Limits. **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]** concludes that with the incorporation of embedded mitigation, the impacts on the designated sites hydrologically linked to the Order Limits are not significant.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	water quality on the features of designated sites should be assessed and mitigation measures should be identified as may be required in order to avoid, minimise or reduce any adverse significant effects		
Water environment	Flood risk and quantity of surface water runoff and quality of surface water runoff arising from the Solar PV Panels and building roofs for all phases of the Scheme has been scoped out of further assessment. Natural England agrees that through appropriate embedded mitigation in the OCEMP, OOEMP and ODEMP there will be no significant effect to designated sites.	No	The Applicant welcomes this comment.
Air quality	In Natural England's Environmental Impact Assessment Scoping advice letter (dated 10 February 2025, our ref: 499672), we advised that the impacts of increased air pollution from construction traffic on nationally and internationally designated sites should be assessed as the exact number and distribution of construction traffic on the network had not yet been determined.	Yes	An assessment of air quality impacts on ecological sites from the Scheme alone and in-combination is presented in **ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13].**
Air quality	Natural England welcomes the use of our guidance on the assessment of road traffic emissions under the Habitats Regulations.	No	The Applicant welcomes this comment.
Air quality	Natural England notes that the figures provided in paragraph 13.6.5 and 13.6.8 of chapter 13 – Air Quality will be below the threshold of 200 heavy duty vehicles (HDV) annual average daily traffic flow (AADT) when considered alone. Natural England concurs with the conclusion that impacts from the proposed development are not significant subject to further evidence being provided. We advise that should there be significant changes to the traffic plans, then impacts from road traffic emissions should be reviewed. We also advise applying the advice provided in Natural England's guidance on the	Yes	An assessment of air quality impacts on ecological sites from the Scheme alone and in-combination is presented in **ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13].** The assessment has been undertaken in accordance with Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations in this assessment. As detailed in Table 13.1 of **ES Volume 1, Chapter 13 – Air Quality [EN0110014/APP/6.1.13]** Natural England's guidance assessments of construction traffic flows has been considered by the Applicant.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	assessment of road traffic emissions under the Habitats Regulations in this assessment.		
Air quality	Natural England welcomes that in-combination impacts will be assessed in the ES once traffic data is available.	Yes	The Applicant makes note of this comment. An assessment of cumulative and in-combination impacts as a result of construction traffic associated with the Scheme is set out in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11].**
Air quality	Dust emissions during construction and decommissioning have been scoped out of further assessment as they are judged to be not significant as appropriate mitigation measures will be included in an OCEMP and ODEMP. (Paragraph 13.2.2). A Dust Risk Assessment has been included in Appendix 13.1, which has been used to identify the appropriate construction dust mitigation measures for inclusion in the OCEMP.	Yes	The Applicant makes note of this comment. An updated dust risk assessment and mitigation measures are provided in **ES Volume 3, Appendix 13.1 Construction and Decommissioning Dust Risk Assessment [EN0110014/APP/6.3.13.1]** and secured within the **OCEMP [EN0110014/APP/7.1].**
Soils and agriculture	The PEIR states that the design and layout of the Scheme is evolving, and the ALC survey areas may need to be supplemented by additional survey as the design evolves. Natural England advise that where Best and Most Versatile (BMV) land is identified, 1 auger per hectare (plus representative pits), should be used. A semi-detailed survey (1 auger per 2ha, plus representative pits) is considered acceptable where the site is clearly not expected to be BMV agricultural land. We advise that a detailed ALC survey density is used for any proposed permanent infrastructure (i.e. substation). Natural England note that the ALC survey does not include the whole area within the draft order limits, including the grid connection route corridors (paragraph 15.4.8). The Applicant advises that surveys of the cable corridors will be undertaken once the cable routes are confirmed.	No	Detailed ALC work has been completed. Details can be found in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN01101114/APP/6.1.15]** and in the ALC report **[ES Volume 3, Appendix 15.1 Agricultural Land Classification [EN0110014/APP/6.3.15.1]** The CRC has not been surveyed, but the works will involve a narrow trench and will be short term and fully reversible. The Applicant commits to survey the CRC pre-entry and to restore the narrow areas trenched to the comparable ALC grade after cables have been inserted. This will be secured through a Soil Management Plan: An **Outline Soil Resource Management Plan (OSRMP) [EN0110014/APP/7.9]** has been submitted as part of the **draft DCO) [EN0110014/APP/3.1].**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Ground Conditions	Natural England advise that there is a risk of soil damage, ALC degradation and long term or permanent loss of best and most versatile (BMV) agricultural land from the areas not yet surveyed. The temporary displacement of soil during construction as a result of the underground cable installation and temporary access tracks/construction compounds can result in permanent land quality change and soil damage if undertaken inappropriately. Therefore, we advise that ALC surveys are carried out across the whole area within the draft order limits prior to submission, with the results presented within the ES.	No	The Applicant makes note of this comment. Effects on BMV land are covered in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15]** and points raised including soil displacement are detailed in **OSRMP [EN0110014/APP/7.9]**. Detailed ALC at 1 auger per hectare has been completed across all of the Order Limits except for the CRC. Details can be found in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN01101114/APP/6.1.15]** and in the ALC report **[ES Volume 3, Appendix 15.1 Agricultural Land Classification [EN0110014/APP/6.3.15.1]** The CRC has not been surveyed, but the works will involve a narrow trench and will be short term and fully reversible. The Applicant commits to survey the CRC pre-entry and to restore the narrow areas trenched to the comparable ALC grade after cables have been inserted. This will be secured through the **OSRMP [EN0110014/APP/7.9]** has been submitted as part of the **draft DCO [EN0110014/APP/3.1].**
Soils and agriculture	Paragraph 15.6.15 states that that the substations and BESS are proposed to be sited on an area of best and most versatile (BMV) land, including grade 2 agricultural land. Natural England advise that the siting of this infrastructure is reconsidered. We advise that the survey results are used to inform micro-siting of infrastructure, such as the proposed substation infrastructure, to avoid BMV land as much as is practicable prior to submission.	No	The Applicant makes note of this comment. The ALC results have been used in refinement of the design and layout. As described in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15],** the NG Substation and BESS are located in that area for technical reasons and avoidance of Grade 2 land was not possible. In respect of other areas the ALC results and micro-siting are described in Section 15.8.
Soils and agriculture	We advise that the results of the ALC surveys are presented within the ES. This should include a breakdown of the ALC grades (area and percentage) in relation to all relevant areas within the application site boundary. Areas of permanent land take (e.g. substations, access roads etc), areas of temporary land take (e.g. underground cabling) and areas of	No	ALC results have been detailed in full in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15]** Table 15-7: ALC Survey Results Sites 1-10 and BESS.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	habitat enhancement should be clearly presented and assessed (broken down by ALC grade).		
Soils and agriculture	The soils data should be used to inform the site layout and the soil management plan for the entire site regardless of whether the use is permanent or temporary in nature. To avoid permanent land quality change and soil damage, soil will need to be handled according to best practice and reinstated to a high standard to reduce the impacts.	No	An **OSRMP [EN0110014/APP/7.5]** has been published detailing industry standard handling of soil and outlines prevention of soil damage and/or other impacts to the soil.
Soils and agriculture	Natural England advise that the decommissioning process should include reference to BMV land. We reiterate that the spatial distribution of ALC grades determined from a detailed ALC survey should inform the reinstatement criteria, which allows the area of each ALC Grade temporarily disturbed to be returned to the same quality (i.e. ALC grade) as far as practicable to minimise potential loss.	No	This has been addressed. Decommissioning in relation to BMV land has been addressed in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15]**. The Applicant commits to restore all the areas where the works are temporary, and the narrow areas trenched in the CRC, to the comparable ALC grade after cables have been inserted or on decommissioning, save for those areas identified in the OSRMP. This will be secured through a Soil Management Plan. An **OSRMP [EN0110014/APP/7.9]** has been submitted as part of the **draft DCO [EN0110014/APP/3.1].**
Soils and agriculture	In PEIR Appendix 15.1 Agricultural Land Classification, Land with sample points 103-188 section 3.2 states that “The southeast corner of the site south of Fairstead Lane is identified as 861b Isleham 2 association, deep permeable sandy and peaty soils affected by groundwater.” If peat is found in the survey, then this area should be avoided.	No	No peat was found in the ALC. This has been detailed in **ES Volume 3, Appendix 15.1 Agricultural Land Classification [EN0110014/APP/6.3.15.1]**.
Soils and agriculture	Natural England notes and supports the applicant’s commitments to providing an outline Soil Management Plan (oSMP) or an Outline Soil Resources and Management Plan (oSRMP), as part of the	No	The Applicant makes note of this comment. An **OSRMP [EN0110014/APP/7.9]** has been submitted as part of the **draft DCO [EN0110014/APP/3.1].**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	development consent order (DCO). The ES and associated oSMP needs to clearly demonstrate how the ALC Grades and soil types will inform soil handling and restoration, setting out the site-specific mitigation measures with reference to the best practice guidance. The oSMP should recognise the exact area and percentage of BMV land that has been identified in the ALC report.		This includes the ALC plans and information on the soils across the Order Limits except for the CRC, which will be surveyed post-DCO.
Soils and agriculture	Natural England advise that the oSMP should include the following: i. The assessment of agricultural land and soil resource of the site that has been undertaken before work commences (as per Natural England's Guide to assessing development proposals on agricultural land) which is considered to represent UK good practice. ii. Mitigation should include reference to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. The Institute of Quarrying's Good Practice Guide for handling soils in mineral workings is also a good reference for best practice methods for soil handling. iii. The methods by which the applicant intends to restore appropriate affected areas to agricultural use after works including excavations and restoration has finished. iv. An aftercare programme which would enable a satisfactory standard of agricultural after-use to be reached, with regards to cultivating, reseeding, draining or irrigating, applying fertiliser, or cutting and grazing the site.	No	The Applicant makes note of this comment. An **OSRMP [EN0110014/APP/7.9]** has been submitted as part of the **draft DCO [EN0110014/APP/3.1].** Prior to commencement of development, and prior to the production of the Soil Management Plan, a detailed ALC and soil survey of the cable route corridor within the Order Limits will need to be completed and reported within the SMP. Defra's Code of Conduct has been mentioned in the **OSRMP [EN0110014/APP/7.9]** as a relevant policy and/or guidance. Soil aftercare and remediation is also mentioned in the **OSRMP [EN0110014/APP/7.9].**
Soils and agriculture	Handling soils in adverse weather conditions can cause damage to soil structure. Natural England recommends the inclusion of rainfall criteria for handling in the soil handling strategy, which includes stop work criteria.	No	The Applicant makes note of this comment. The details are provided in the **OSRMP [EN0110014/APP/7.9]** which has been submitted as part of the **draft DCO [EN0110014/APP/3.1].**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	Natural England advise that the ALC survey data can be used to ensure the soil is restored to its baseline condition (i.e. the soil profile as described during the ALC survey). Soil data collected as part of an ALC survey can also be used to inform the soil management plan as set out in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Natural England recommend that the soil resource is monitored during construction and operation, and this should be included in the SMP. Natural England will review this once it has been completed.		
Soils and agriculture	Paragraph 16.6.43 references potential measures for the decommissioning of the cables. This includes leaving the cables in situ and opening the ground at regular intervals and pulling the cable through to the extraction point. Where cables are installed deep enough, it may be acceptable for them to remain in situ (from an agricultural land and soils perspective), as they would be avoiding the soil disturbance altogether at decommissioning. The position of a minimum depth of 900mm is recognised as the industry standard. The main requirement would be that they are installed deep enough to avoid any potential impact from standard agricultural practices during operation (i.e. the installation depth).	No	The Applicant makes note of this comment. The details are provided in the **OSRMP [EN0110014/APP/7.9]** which has been submitted as part of the **draft DCO [EN0110014/APP/3.1].** The details of which cables are to be removed and which are not is not provided in the **OSRMP [EN0110014/APP/7]** but section 6 of that document sets out that a detailed Decommissioning Phase SMP will be needed prior to decommissioning.
Cumulative impact	Natural England welcome that a Cumulative and In-Combination Effects Assessment has been undertaken and understand that this will be updated as further evaluation becomes available. We will review this once it has been completed.	No	The Applicant welcomes this comment.
Outline Management Plans	Several management plans have been referenced in the PEIR documents, including an OCEMP, OOEMP, ODEMP and LEMP. However, no management plans,	Yes	The Applicant notes this comment. The Outline Management plans mentioned can be found below:

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	outline or otherwise, have been submitted as part of this consultation. Natural England will provide comment on the relevant management plans when they are available to review.		• **OCEMP [EN0110014/APP/7.1]** • **OOEMP [EN0110014/APP/7.2]** • **ODEMP [EN0110014/APP/7.3]** • **OLEMP [EN0110014/APP/7.4]**
Ecology and biodiversity	Natural England advise that the mitigation measures included in these plans should be assessed in the HRA, where relevant to internationally designated sites. Should the requirement for an appropriate assessment be identified, we advise that it should assess the effectiveness of all relevant mitigation measures and demonstrate how the impact will be completely avoided or reduced to an acceptable level.	Yes	The Application includes a **Shadow Habitats Regulation Assessment [EN0110014/APP/7.25]** which has considered these mitigation measures.

1.22 Norfolk County Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Water Environment	In Chapter 3 the applicant provides a summary of the various sites. The LLFA notes there is information in most sections relating to the presence of watercourses. Although frequently it is not specified on the number or location of the watercourses (such as in section 3.4.1). It is also not clear from the information whether these are 'main rivers' or 'ordinary watercourses'. In addition, no pond features have been identified such as in site area 2B where at least two	Yes	The figures in Appendix A of **ES Volume 3, Appendix 9.1: Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** has been amended to label watercourses more clearly.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	ponds are denoted on the OS base map in Figure 1.1. Not all the ordinary watercourse features have been identified either such as the ordinary watercourse on the eastern boundary of the proposed BESS site shown on the OS mapping.		
Water Environment	It is also not clear whether there are any Internal Drainage Boards in the area or not.	Yes	Principal watercourses and the respective Internal Drainage Board (IDB) district is highlighted in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**. This is the Waveney, Yare and Lothingland IDB.
Water Environment	In addition, the description of the surface water flood risk is vague and limited when compared to the description of the location of the heritage features. The descriptions do not identify the surface water flow paths that cross the site areas. While the LLFA appreciates there is a specialist chapter (Chapter 9), the amount of baseline description of the site in chapter 3 compared to other disciplines is lacking and inhibits the appreciation of the features described as the descriptions appear to be very similar and generic. Further information is required.	Yes	Further information in relation to surface water flood risk has been outlined in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Water Environment	In section 4.3.10, flooding was identified as an environmental consideration using the Flood Zones and the surface water flooding. However, it is not clear to the LLFA whether historic flood incidents have been considered too. Further information and clarification is required.	Yes	The historic flooding has been outlined and considered within **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Water Environment	In Table 4.1 the LLFA notes that not all surface water flow paths and ordinary watercourses considerations were identified, such as in relation to 7D, 7E and 7F. Therefore, the LLFA	Yes	Ordinary Watercourses are identified in **ES Volume 2, Figure 9.1 Site Location and Watercourses [EN0110014/APP/3.9.1].**

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	lacks confidence in the information presented in this table due to the incomplete information provided. The LLFA requires the Table to be reviewed and updated appropriately. Further information and work is required.		Surface water flowpaths are identified in Appendix A of **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Water Environment	The LLFA is aware the applicant is still developing their design approach. The LLFA notes in section 5.2.11, the potential need to use concrete blocks in some areas where driving the mounting pole into the ground is not possible. The LLFA notes that should the concrete blocks be required then the surface water runoff from the concrete blocks would need to be managed due to the increase in impermeable area that is associated with them. Further information is likely to be required.	Yes	Concrete footing supports may be utilised where there is a requirement to protect any underground assets/resources i.e. the steel supports will sit on top of the concrete footing rather than being pile driven into the ground. The locations of these footings are not known at this stage, however, their use will be limited and will be informed by detailed design and archaeological assessments. This is outlined in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Water Environment	It is not clear to the LLFA what factors the applicant would consider limiting the 0.6m freeboard delivery as this freeboard is sought to ensure the continuous operation of the proposed development. Further information is required.	Yes	This freeboard has been updated in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**. It is also included in the **Design Parameters, Principles and Commitments document [EN0110014/APP/7.18]**.
Water Environment	In sections 8.4, 8.7, 8.8 and 8.9, the LLFA notes the increase in impermeable area associated with the invertor, transformers switchgears or the conversion units and the switch rooms. It is not clear from the description in chapter 5 Figures 1.1 and 5.1 where this infrastructure will be placed or the number of these features that will be needed. The gravelled area mentioned would also be considered as an impermeable area due to the need to compact the platform the development	Yes	The welfare facilities and inverter/transformer/switchgear areas will either be located within the Substation compounds or be standalone. Where located within the compounds, they would drain to the Substation surface water drainage system. Where they are standalone, they would incorporate a filter drain and/or gravel bed with aggregate sub-base, with overflow outlet as required should infiltration testing show insufficient results. This is secured within the **Outline Operational Environmental Management Plan (OEMP) [EN0110014/APP/7.2]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	would be sighted upon. This combined with the lack of infiltration testing means the drainage strategy for these areas and in accordance with the LLFA Developer Guidance, means the LLFA would expect a Plan B to be provided for each of the sites to ensure there is a viable surface water drainage strategy that prevents an increase in flood risk on site or elsewhere in accordance with NPPF. Further work and information is required.		Boreholes show that the area is underlain by a significant thickness of Lowestoft Formation (Diamicton) which consists of blue/yellow clay. As such, it is considered that the use of infiltration drainage is unlikely to be feasible but will be confirmed through infiltration testing post-consent. A 'Plan B' surface water drainage strategy has been developed in the absence of infiltration testing (to be undertaken post consent) with a controlled discharge to watercourse in accordance with the LLFA Developer Guidance. Further detail is provided in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Water Environment	The LLFA notes the description of both the 132kV Substation (sections 5.2.21 to 5.2.23) and the National Grid Substation (5.2.24 to 5.2.26), the management surface water runoff has not been discussed, however the inclusion of office space and welfare facilities was identified. Due to the nature of the construction, the LLFA understands the substation areas to be impermeable and will have an increased rate of surface water runoff. The LLFA in accordance with NPPF requires there to be no increase in flood risk from the proposed development on site or elsewhere. Further information is required on the proposed surface water management for these units.	Yes	The office and welfare facility cabins will be located within the Substation compounds. The Substation compounds will have a surface water drainage system lined with an impermeable membrane, with a controlled discharge to watercourse. The surface water drainage strategy is outlined in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Water Environment	The LLFA notes that a new national grid substation is included within this proposed scheme, although the selection of the proposed is yet to be confirmed, two options have been included. It is presented as likely that the re-routing of the existing over headline. At this stage the Nation Grid Substation compound is assumed to have 3ha area along with a need for a 0.5 ha cable sealing end compound that	Yes	The National Grid Substation will be located within Sub-Site 1B. The National Grid Substation will have a surface water drainage system (assessed as permeable surface with aggregate sub-base lined with an impermeable membrane), with a controlled discharge to watercourse. Final form of attenuation is to be confirmed at detailed design. The associated access track will have a swale or filter drains running parallel to the track to capture surface water runoff.

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	appears to have a substantial impermeable area associated with both. However, there is no discussion on the inclusion of sustainable drainage or demonstration that suitable space has been provided for the inclusion of sustainable drainage. Further information is required to demonstrate that sufficient space is available along with suitable commitment to the provision of SuDS to prevent an increase in flood risk from the proposed development. The LLFA notes there is also no mention of access road to the site and the management of its surface water runoff. Further information is required.		Further information on the surface water drainage strategy is outlined in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Water Environment	Sections 5.2.42 to 5.2.48 provides a description of the proposed BESS facility. However, there is no discussion on the required surface water runoff management. The LLFA notes that both on this component and the other previous components there has been no mention of surface water drainage and attenuation to prevent an increase in surface water flood risk. In section 5.2.44, the applicant notes the base is likely to consist of either reenforced concrete foundation slab, or concrete piling for the BESS equipment. Due to the nature of this construction, it is understood the wider compound would be an impermeable area that would have an increased rate of surface water runoff. While it is acknowledged by the LLFA that the proposed development is at an early stage in the design development, there should some acknowledgement and commitment to the management of surface water flood risk and the provision of suitable space for appropriate drainage features to demonstrate there are	Yes	Substations will have transformers which will be set on plinths and bunded. The proposed surface water drainage systems for the Substations will incorporate self-actuating penstock valves as required. The surface water drainage strategy is outlined in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.

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	measures in place to prevent an increase in flood risk. Further information is required.		
Water Environment	In relation to the proposed site access (sections 5.2.67 to 5.2.69), there has been no mention of the surface water management arrangements to ensure there is no increase in flood to the existing road or elsewhere. There is also no consideration or discussion on the possible need to cross existing ordinary watercourses or surface water flow paths. The LLFA notes that safe access and escape routes should be provided. The applicant should consider the existing surface water flood risk associated with the existing highway network. This may result in site access route either needing to be revised or surface water management improvements to the local highway network being required. Further work and information is required.	Yes	Where works are required to existing roads to facilitate the Scheme, these will include appropriate surface water management measures as appropriate. Where there are requirements to cross watercourses during the Construction Phase, these will consist of Temporary Access Ramps, with open span being the most preferred option. The above are secured within the **Design Principles Parameters and Commitments** document **[EN0110014/APP/7.18]**. The above are secured within the **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]** and **Design Principles Parameters and Commitments** document **[EN0110014/APP/7.18**].
Water Environment	In section 5.5.3, the LLFA notes the inclusion of temporary hardstanding and temporary office and welfare facilities. However, there is no discussion in this section or the subsequent ones for the inclusion of supporting infrastructure such as sustainable surface water management. At present, there is no commitment to the inclusion or assessment of surface water management for the construction phase. The LLFA is concerned that this could result in an increased risk of flooding from the increase in impermeable areas during construction. While in section 5.5.8 to 5.5.12, the LLFA notes there is no mention of surface water management or drainage. Further information is required.	Yes	The Scheme commits to include appropriate surface water management measures for all phases. Surface water management measures for the construction measures are outlined in the **OCEMP [EN0110014/APP/7.1]**.

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Water Environment	In Table 5.3, the LLFA notes the access points to each of the sites. However, it is not clear whether the access points have been considered in terms of existing flood risk. In addition, it is not always clear how the Cable Route Corridor areas will be accessed. Further information is required.	Yes	Where internal haul routes require crossings over watercourses, these will be facilitated through temporary access ramps which will be removed following cable installation. This is secured in the **Design Parameters Principles and Commitments** document **[EN0110014/APP/7.18]**.
Water ENvironment	In sections 5.5.18 to 5.5.20, the LLFA notes the replacement activities are discussed. The applicant states that "Planned replacement of all Solar PV Panels once during the operational phase. The Solar PV panels are anticipated to be replaced over a 12 to 24 month period." The applicant goes on to state "It is expected that the BESS could be replaced up to five times during the operational phase". In section 5.5.19, the applicant states "it is considered that the duration, intensity and types of activities associated with replacement would not exceed that of the construction phase." The initial construction phase requires considerable areas of temporary construction compounds and hardstanding. However, in the PEIR, it is not clear at this time whether the same temporary construction facilities would be expected for the interim replacement activities and where they would be located. Further information is required.	Yes	Maintenance details for panel/battery replacement and the management/maintenance activities associated with the proposed surface water drainage system features are outlined in the **Outline Operational Environmental Management Plan (OOEMP) [EN014011/APP/7.2]**. The assessment in the ES Chapters confirm that the replacement activity would be considerably less intensive than during construction. Access to the Sites will be via the access routes defined for the construction phase. Maintenance will be via the provision of operational and maintenance buildings as set out in the **Design Principles, Parameters and Commitments** document **[EN0110014/APP/7.18]**.
Water Environment	The LLFA notes in Table 9.1 the applicant's attempts to scope out the flood risk assessment despite it being a requirement of EN1 and all major development applications. The LLFA notes from the review of the proposed	Yes	t was always the Applicant’s intention to prepare a Flood Risk Assessment (FRA), just that the assessment within **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]** would be proportionate to the nature of the elements of the Scheme.

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	development description (PEIR Chapter 5) and the Flood Risk Assessment and Drainage Strategy (Appendix 9.1) that the applicant has under-estimated the impermeable area and has not yet assessed or investigated the ground conditions and the viability of infiltration. The LLFA is aware of poor infiltration rates within areas of the site that contribute to existing local flood risk issues. The LLFA also notes a number of areas where incomplete or inconsistent information has been provided in both the sections of the report that are required at this time. Further information is required.		**ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** sets out impermeable areas and measures for surface water management for those areas. The LLFA Development guidance is referenced within **ES Volume 3, Appendix 9.1 - Flood Risk Assessment** and **Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] and ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**. The inconsistencies in reference to utilising infiltration for inverter/converter units whilst opting for discharge to watercourse for other drainage systems for the wider Scheme have been rectified within **ES, Volume 3, Appendix 9.1: FRA [EN0110014/APP/6.3.9.1]**. As agreed with the LLFA, there is a commitment to providing an overflow outlet to the inverter units in the event that infiltration testing provides an unfavourable result.
Water Environment	The LLFA notes the LLFA Developer Guidance has not been referred to in section 9.1.13. The LLFA reminds the applicant that NPPF paragraph 182.a is clear that developers should "take note" of the LLFA advice. The LLFA confirms the LLFA Developer Guidance forms part of the advice that the LLFA provide and that it should be taken note of. Further information is required.	Yes	The LLFA Development guidance is referenced within **ES Volume 3, Appendix 9.1 - Flood Risk Assessment** and **Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] and ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]**.
Water Environment	The LLFA disagrees with the summary in Table 9.3, where the applicant seeks to scope out the "Flood risk from all sources and impacts on floodplain storage from solar panel installation and infrastructure buildings" and the "Impacts from changes in quantity of surface water runoff and groundwater recharge arising increases in impermeable areas arising from solar panels and inverter/transformer/cabin roofs". These are notable areas of environmental risk in the area of the proposed development.	Yes	Further information has been provided in this report and **ES Volume 1 Chapter 9: Water Environment [EN0110014/APP/6.1.9]** to support the scoping out of flood risk and groundwater recharge impacts from Solar PV Arrays. The LLFA's comment is noted on historic flooding issues in nearby settlements. However, the majority of the Scheme will convert fields from agricultural use to grass cover which will promote soil stability and increase ground roughness slowing the rate of runoff flowing across the fields. All electrical infrastructure will be located within Flood Zone 1 and within areas of lowest surface water flood risk as far as practicable.

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	The LLFA notes that many of the communities have experience flooding both in the distant and recent past. Currently in three of the communities impacted by the proposed development experience are being investigated for flood and water management solutions due to the frequency of flood incidents. While some these flood risk management schemes are in the early stages consideration, they are an indication of the presence of surface water flood risk. Areas affected by historic flooding issues include Hempnall, Saxlingham Nethergate, Woodton and Long Stratton. Woodton is part of the DEFRA/Environment Agency FCRIP Programme in Reclaim the Rain project. This project is implementing some local catchment measures to reduce flood flows by reusng surface water. The village is downstream of site areas 10A, 10B, 10C and 10D. the proposed development has already influenced the implementation of one element due to the potential presence of the cable route in CRC9. The LLFA previously made the applicant aware of this project, but no acknowledgement from the applicant has been provided. These potential schemes and progressing schemes demonstrate the presence of flood risk in these communities that risk management organisations are progressing when possible. The flood risk assessment and drainage strategy does not reflect the historic flood risk and incidents experienced by these		Where significant areas of impermeable area will be installed (i.e. Substations and BESS), these will incorporate surface water drainage systems. Standalone inverters/cabins will have filter drains or aggregate surface with sub-base with natural percolation to ground, and inclusion of appropriate overflow outlet as required (secured within the **Outline OEMP [EN0110014/APP/7.2]**. The Solar PV Arrays will be raised up on narrow supports allowing flow of surface water runoff beneath. The supports represent a negligible area and will therefore not significantly affect floodplain storage or flow routes. As such, the Scheme will not contribute to increased risk of flooding within the Order Limits or elsewhere. Further detail is provided in **ES Volume 1 Chapter 9 – Water Environment [EN0110014/APP/6.1.9]** and **ES Volume 3 Appendix 9.1: FRA [EN0110014/APP/6.3.9.1]**. The Scheme has utilised the sequential approach in locating above ground electrical infrastructure within Flood Zone 1 and outside of areas of surface water flood risk as far as reasonably practicable. As such, the Scheme no longer includes the area associated with the Reclaim the Rain project.

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	communities in the recent and distant past due to the lack of consideration by the applicant. The applicant should scope in the flood risk and surface water management into the Environmental Impact Assessment process, as at present there is a lack of evidence provided in the incomplete flood risk assessment and drainage strategy to demonstrate there is no increase in flood risk due to the scheme. Further work and information is required.		
Water Environment	For example, Saxlingham Nethergate is sensitive to overland surface water flows from the fields upstream of the village. A natural flood management scheme surface water management scheme is being considered and would aim to reduce flooding at the bottom of Church Hill, Pitts Hill and along Norwich Road in Saxlingham Nethergate, downstream of the site area 7D. Long Stratton has also flooded significantly in recent times. As part of the Long Stratton relief road, the opportunity to incorporate a number of additional upstream flood attenuation and management measures to reduce the flood risk in the town was taken. The CRC4 area of the proposed development has the potential to interact with upstream catchment areas. Stantec would be aware of the work at Long Stratton due to their previous involvement in developing the Long Stratton design. Hempnall and some of its surrounding areas has experienced flood incidents in the recent and distant past. There is current consideration	Yes	This is noted by the Applicant.

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	of whether a flood management scheme could progress in the area.		
	In section 9.2.9, the applicant again mentions the present of IDB drains, yet there has been no discussion or consideration of whether IDB drains are within the area. Further information is required.	Yes	No IDB drains are located within the Order Limits, however IDB drains are located downstream of Sub-Site 7A/adjacent to Sub-Site 4A. Further information is contained in **ES Volume 1 Chapter 9 – Water Environment [EN0110014/APP/6.1.9]** and **ES Volume 3 Appendix 9.1: FRA [EN0110014/APP/6.3.9.1]**.
Water Environment	In Table 9.4, the LLFA notes that surface water flood risk is not considered in the sensitivity of water receptors, however, fluvial flood is included. This lack of consideration of surface water flood risk in the magnitude of impact table (Table 9.5). The inclusion of surface water flood risk is required. Further information is required.	Yes	Surface water flood risk definitions have been added to receptor sensitivity and magnitude of impact tables within **ES Volume 1 Chapter 9 – Water Environment [EN0110014/APP/6.1.9]**.
Water Environment	In section 9.5 the LLFA notes the applicant again being inconsistencies with the proposed design and management approaches discussed through sections 9.5.1 to 9.5.14. The LLFA notes this inconsistency is through the PEIR and the flood risk assessment and in section 9.5 the LLFA notes the applicant again being inconsistencies with the proposed design and management approaches discussed through sections 9.5.1 to 9.5.14. The LFA notes this inconsistency is through the PEIR and the flood risk assessment.	Yes	Inconsistencies between the ES and **ES Volume 3 Appendix 9.1 FRA [EN0110014/APP/6.3.9.1]** have been addressed.
Water Environment	Again, there is some initial information about fire suppression for the BESS facility in section 9.6. However, there is no information about the fire suppression for the either of the substations, both of which with have transformers and other infrastructure included onsite with specific fire control and drainage requirements. As this has not been considered, further information is required.	Yes	Substations will incorporate auto shut-off penstock/valves as required. Transformers will be bunded to contain oils in the event of leak from the structure, with runoff from these areas assumed to be conveyed to a filter/dump tank separate to wider drainage system. The above mitigation measures are secured through the **Outline Operational Environmental Management Plan [EN0110014/APP/7.2].**

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	At present in section 9.7, the applicant has stated that "no additional mitigation is proposed as the embedded mitigation outlined in section 9.4 is considered sufficient. At this time, the LLFA is concerned by this statement due to the lack of evidence and consideration given in the Flood Risk Assessment and Drainage Strategy. Further work, evidence and information is required before this can be demonstrated.		
Water Environment	In section 1.6.1 the applicant indicates that they have obtained hydraulic modelling outputs from the LLFA. This is not accurate. The LLFA confirms the flood history has been obtained through access to the publicly available flood incident reports. The LLFA requests that this is made clearer in the FRA as at present it is not. Further work and information is required.	Yes	This sentence has been corrected within **ES Volume 3 Appendix 9.1: Flood Risk Assessment & Outline Surface Water Drainage Strategy Report [EN0110014/APP/6.3.9.1]**
Water Environment	In section 9.5 the LLFA notes the applicant again being inconsistencies with the proposed design and management approaches discussed through sections 9.5.1 to 9.5.14. The LLFA notes this inconsistency is through the PEIR and the flood risk assessment and in section 9.5 the LLFA notes the applicant again being inconsistencies with the proposed design and management approaches discussed through sections 9.5.1 to 9.5.14. The LFA notes this inconsistency is through the PEIR and the flood risk assessment.	Yes	Inconsistencies between the ES and **ES Volume 3 Appendix 9.1: FRA [EN0110014/APP/6.3.9.1]** have been addressed.
Water Environment	Again, there is some initial information about fire suppression for the BESS facility in section 9.6. However, there is no information about the fire suppression for the either of the	Yes	Substations will incorporate auto shut-off penstock/valves as required.

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	substations, both of which with have transformers and other infrastructure included onsite with specific fire control and drainage requirements. As this has not been considered, further information is required. At present in section 9.7, the applicant has stated that "no additional mitigation is proposed as the embedded mitigation outlined in section 9.4 is considered sufficient. At this time, the LLFA is concerned by this statement due to the lack of evidence and consideration given in the Flood Risk Assessment and Drainage Strategy. Further work, evidence and information is required before this can be demonstrated.		Transformers will be bunded to contain oils in the event of leak from the structure, with runoff from these areas assumed to be conveyed to a filter/dump tank separate to wider drainage system. The above mitigation measures are secured through the **Outline Operational Environmental Management Plan [EN0110014/APP/7.2].**
	In section 1.6.1 the applicant indicates that they have obtained hydraulic modelling outputs from the LLFA. This is not accurate. The LLFA confirms the flood history has been obtained through access to the publicly available flood incident reports. The LLFA requests that this is made clearer in the FRA as at present it is not. Further work and information is required.		This sentence has been corrected within **ES Volume 3 Appendix 9.1: Flood Risk Assessment & Outline Surface Water Drainage Strategy Report [EN0110014/APP/6.3.9.1]**
Water Environment	In section 3.2, the topography is briefly considered for each of the site's areas of infrastructure with the highest and lowest levels given. However, this information in itself does not provide an accurate depiction of the local topography for a wide range and extensive site across multiple watercourse catchments. It is also noted that no topography information for the cable route corridor has been included. This information is considered incomplete and lacks relevance to the FRA at present due to an	Yes	Section 3.2 of **ES Volume 3 Appendix 9.1: FRA [EN0110014/APP/6.3.9.1]** has been updated to include a table for topography. **ES Volume 3 Appendix 9.1: FRA [EN0110014/APP/6.3.9.1]** has been updated to reference existing field drains/watercourses.

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	incomplete data set and a limited context that is provided. Further information is required. In section 3.4.1, the applicant has not confirmed whether any existing field drainage is in place either in the site or cable route corridor locations. In section 2.2.6 the applicant states that "Paragraph 2.10.85 notes that the FRA will need to consider the impact upon Drainage". Further information is required.		
Water Environment	The LLFA notes that section 4.3, discusses the application of climate change into the proposed design considerations for the proposed development. The LLFA notes that again, the applicant has assessed based on the assumption of all aspects of the proposed development being decommissioned after 60 years of service. However, in sections 5.5.25 to 5.2.33 of the PEIR a number of elements (including access tracks and site access points, the national grid substation, pylons, overhead lines or sealing end compound) are considered to be permanent with a design life that would extend beyond 2100. The LLFA notes there continues to be an inconsistency through the assessment and the supporting evidence base relating to the expected lifetime of the proposed development and its various elements. Therefore, two climate change allowances for the surface water runoff are to be considered. All features that are proposed to be removed after 60 years of operational life (estimated to start decommissioning in 2090) should be assessed	Yes	Section 4.3 Table 4.1 of **ES Volume 3 Appendix 9.1: FRA [EN0110014/APP/6.3.9.1]** has been updated to apply the exceptions rule for peak rainfall intensity. As a conservative approach, the Upper End 2070s epoch +45% allowance for peak rainfall intensity has been used to assess surface water attenuation requirements for the BESS and Project Substation elements of the Scheme, based on a development lifetime of 60 years (up to 2090). The National Grid element has a development lifetime beyond 2100 and the Upper End 2070s epoch +45% allowance has been used to assess the surface water attenuation requirements for this element of the Scheme.

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	with the central allowance for the 2070s epoch. While those with a permanent lifetime should be considered with a development lifetime of beyond 2100 and have the upper end allowances for the 1% and 3.3% AEP events for the 2070s epoch applied. Where there is uncertainty or potential overlap between the proposed design and the surface water discharge, a precautionary approach is advised and the LLFA suggests as a minimum a sensitivity test using the upper end allowance is undertaken that may lead to further mitigation and management measures being required. In addition, the applicant not considered the exceptions rule in relation to climate change allowances. The Exceptions rules states "In some locations the allowance for the 2050s epoch is higher than that for the 2070s epoch. If so, and development has a lifetime beyond 2061, use the higher of the two allowances." The Broadlands Rivers Management Catchment, where the site is located within, is a catchment where this rule applies. Therefore, for the 1% AEP events for the permanent developments and for the sensitivity test would be expected to apply the 45% climate change allowance. Further work and information is required to resolve this inconsistency on the proposed lifetime of the development. The Broadlands Rivers Management Catchment, where the site is located within, is a catchment where this rule applies. Therefore,		

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	for the 1% AEP events for the permanent developments and for the sensitivity test would be expected to apply the 45% climate change allowance. Further work and information is required to resolve this inconsistency on the proposed lifetime of the development.		
Water Environment	In section 5.2.3 to 5.2.5, the LLFA notes the applicant considers the surface water flooding on the local roads and to local properties to be due to unmaintained drainage systems. The LLFA notes that water received by these "unmaintained drainage systems" and "overland flow path" would have been derived from the surrounding landscape that the proposed development is sited within. The LLFA advises that a precautionary approach to the surface water assessment should be applied. Further work and information is required.	Yes	The Applicant notes this comment. The majority of the Order Limits will be covered by Solar PV Arrays. The provision of grass cover across the Solar Array fields will increase ground roughness, provide greater soil stability and slow the rate of runoff across the fields. As such, there should be a reduction in flood risk to downstream properties.
Water Environment	Within the section 5.7, the LLFA notes the applicant's reference to: *"a comparison of the Flood Zone maps and the modelled flood extents for these areas confirms that the Flood Zones are based on the model outputs."* It is not always clear within the FRA whether the flood zone maps referred to were based on the latest NAFRA2 flood mapping released in March 2025 or not. Further clarification is required. In section 5.7.8, the LLFA notes the applicant's referral to Figures 9.2a with Lidar Contours. The LLFA has briefly reviewed these Figures	Yes	Topography figures have been updated to 1m resolution LiDAR, figure has been provided for Starston Brook floodplain and watercourses have been labelled on figures - see **ES Volume 3 Appendix 9.1: FRA [EN0110014/APP/6.3.9.1]**.

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	and notes that a contour line every 2m is not providing suitable amount of detail. Further work is required. The LLFA notes there is no figure provided to support the statements made on assumptions in relation to Starston Brook. The LLFA will require a figure to be provided to support the information in section 5.7.8 to 5.7.11. Further information required. On review of Figure 9.1 in support of the information on Starston Brook, the LLFA notes the watercourses are not named. Therefore, it is not possible to identify the watercourses in accordance with the naming convention given in the Flood Risk Assessment. Further work and information is required.		
Water Environment	In section 6.1, the applicant has indicated that in flood risk vulnerability terms the whole site is classed as a solar farm. This is not correct. The LLFA notes that some areas of the proposed development are for BESS and others are for energy infrastructure such as grid and primary substations. It is worth noting that solar farms are shown separately from essential utilities. Essential utilities are defined in the Essential infrastructure class as; *"Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; including electricity generating power stations, grid and primary*	Yes	Flood risk vulnerability classifications have been updated within **ES Volume 3 Appendix 9.1 FRA [EN0110014/APP/6.3.9.1]** as outlined by the LLFA in their comment. They have been updated so that the BESS facility is now classified as 'Highly Vulnerable' as it is located within Flood Zone 1 and outside of areas of significant surface water flood risk. The remainder of the Scheme is classified as 'Essential Infrastructure'. The Scheme has taken a sequential approach to location of electrical infrastructure within the Order Limits as far as reasonably practicable (location in Flood Zone 1, and within areas of lowest surface water flood risk as far as practicable). Where infrastructure is located within areas of surface water risk, this is generally limited to Solar PV Arrays which are raised above the ground on narrow supports at a suitable freeboard above modelled flood levels/anticipated surface water flood depths so that they are flood resilient and remain operational for their lifetime.

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	substations storage; and water treatment works that need to remain operational in times of flood." The LLFA notes the emphasis is on operational need for the infrastructure to be in an area of high flood risk with the phrasing "has to be located in a flood risk area for operational reasons". The applicant has not demonstrated the operational need in the flood risk assessment or in the proposed development description to be areas of high flood risk. Therefore, further information is required to address this point. However, in relation to BESS facilities when reviewing the 'highly vulnerable' classification, it states *"Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.)"* Therefore, it is clear that BESS facilities fall under the 'highly vulnerable' classification for the sequential test. This results in the exception test being required for Flood Zone (areas of medium flood risk of land having between 1% and 0.1% AEP flood risk) and development not		The Sequential and Exception Tests have been undertaken for the Scheme and are provided in Appendix A of the **Planning Statement [EN0110014/APP/7.14]**.

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	permitted in flood zone 3a and b (areas of high flood risk of land having up to 1% AEP flood risk). The LLFA requires further consideration of the sequential test.		
Water Environment	In relation to the Sequential Test, as the site is vast spanning 16.5km from Great Moulton to Seething and 7.5km from Shotesham to Lundy Green and is within at least four river catchments, it is appropriate for the Sequential Test to be considered on a site by site basis on this occasion due to the scale and nature of the proposed development. It is noted that the current sequential test only considers the operational phase of the development's lifetime. There is no consideration for the temporary phases for construction, maintenance and decommissioning (where applicable). In addition, the applicant does point out that EN1 paragraphs 5.8.6, 5.8.7 and 5.8.9 supports the need to apply the sequential test appropriately and the key principles of NPPF through its statement of *"Where new infrastructure is exceptionally necessary in flood risk areas, policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall."* At present the applicant has not demonstrated that there is no increase in flood risk as the flood risk assessment, drainage strategy and PEIR lacks areas of consideration and information with appropriate supporting	Yes	The Scheme has taken a sequential approach to location of electrical infrastructure within the Order Limits as far as reasonably practicable (location in Flood Zone 1, and within areas of lowest surface water flood risk as far as practicable). Where infrastructure is located within areas of surface water risk, this is generally limited to Solar PV Arrays which are raised above the ground on narrow supports at a suitable freeboard above modelled flood levels/anticipated surface water flood depths so that they are flood resilient and remain operational for their lifetime. All temporary construction compounds have been located within Flood Zone 1 and outside of areas of significant surface water flood risk. The Sequential and Exception Tests have been undertaken for the Scheme and is provided in Appendix A of the **Planning Statement [EN0110014/APP/7.14]**. At the time of PEIR preparation, insufficient information was available on dimensions and location of infrastructure. This information is now available and communicated within the **Design Principles Parameters and Commitments Register [EN0110014/APP/7.18]** The BESS, standalone inverter units and Substation elements of the Scheme have their own surface water drainage system designed using the Upper End 2070s climate change allowance as outlined in **ES Volume 3 Appendix 9.1 FRA [EN0110014/APP/6.3.9.1]**. The PV Solar Arrays are raised above the ground on narrow supports which represent a negligible increase in impermeable area, with the grass cover maintained beneath. Rainfall falling on the PV Arrays will drip onto the ground through the vertical and horizontal gaps in the Arrays dispersing the rainfall over the ground which will then naturally percolate through the soil as per the existing scenario. As such, the Scheme will not result in an increase in flood risk elsewhere.

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	evidence. Furthermore, the applicant has also not demonstrated that where possible the development is able to reduce flood risk in existing host communities. Further work is required.		
Water Environment	The LLFA notes in section 7.1 the applicant discusses the Environment Agency's freeboard requirements. The LLFA notes in section 7.1 the applicant states *"The built electrical infrastructure proposed within the Scheme (BESS, substations (including that for the National Grid Substation) and inverter units) will be set on land that is anticipated to have a freeboard in excess of the above requirements (since it will be located outside of areas of Flood Zones 2 and 3)".* However, there is no consideration of the surface water freeboard allowances. In addition, there is no discussion on the LLFA's freeboard requirements. The LLFA Developer Guidance states in section 18.1.3 that *"the LLFA expects it to be demonstrated that the drainage system is designed so that unless an area is designated to hold or convey water, flooding must not occur in any part of a building or utility plant susceptible to water e.g. pumping station or electricity sub-station (Standard S8 of the SuDS Non-Statutory Technical Standards (2015))."* Further information is available in the section, although in relation to this development the	Yes	EA and LLFA require Solar PV Arrays and associated electrical infrastructure to be set at a minimum 300mm above modelled flood levels. Freeboard of Solar PV Arrays are set significantly above the EA modelled floodplain for the Hempnall Beck and River Tas and have freeboards in excess of the EA and LLFA requirements. The lowest edge of the Solar PV Panels will be set at a minimum of 0.4m above ground level. Where Solar PV Panels are situated in areas of 'low' to 'high' surface water flood risk, the Solar PV Panels will be raised higher where practicable, or the use of Single Axis Tracker panels will be considered. The inverters will be typically set on block 100-150mm or concrete plinth above the surrounding ground level. Other ancillary buildings will likely consist of temporary style modular buildings over a concrete pad that provides a 150mm freeboard above the surrounding ground level. Freeboard requirements are secured within the **Design Principles Parameters and Commitments Register [EN0110014/APP/7.18]** and the **Outline Operational Environmental Management Plan (OEMP) [EN0110014/APP/7.2].** Further information on flood levels and freeboards is provided in **ES Volume 3 Appendix 9.1 FRA [EN0110014/APP/6.3.9.1].**

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	LLFA would expect that there would be a minimum of at least 150mm freeboard between proposed external ground levels and property FFL / utility plant susceptible and that a minimum of 300mm freeboard above the anticipated flood levels from any source of flooding. Further consideration and information is required.		
Water Environment	In section 7.3 it is not possible for the LLFA to confirm whether is approach has been applied to the proposed development as no existing or proposed access tracks are shown on the various figures. Figure 5.1 does show the access points from the public highway network but no further information is given within the site area. On Figure 5.1 sheet 2, the proposed development is shown adjacent to an existing solar farm. The existing solar farm shows a number of permeant internal access tracks. The applicant has also indicated that internal access tracks would be constructed to support the proposed development. At present, there is no information or evidence provided by the applicant to support the statements made is section 7.3. Further information is required. As previously stated in relation to Chapter 5 of the PEIR LLFA response, the access tracks are discussed in sections 5.2.70 to 5.2.73. They are also discussed in section 8.6 of the Flood Risk Assessment and Drainage Strategy. Previously in the PEIR site description the applicant has indicated that onsite access tracks will comprise of using existing agricultural tracks and constructing new access tracks. However,	Yes	Internal access tracks will be installed within fields to facilitate maintenance/replacement activities. Access into the fields will be via main roads, with crossing points via ramps for any 'between' field access required where an internal access point does not already exist. The LLFA's concern on the buildup of the access track and risk of compaction of the surface is noted. Internal access tracks will incorporate filter drains and/or swales either at downstream end or running parallel with the track to manage surface water runoff. The above measures are secured through the **Design Principles Parameters and Commitments Register [EN0110014/APP/7.18]** The temporary internal haul routes will be constructed of hardcore or gravel over levelling layer of substrate. The majority will be constructed using a hardcore Ministry of Transport (MoT) Type 1 stone base. Where permissible, aluminium 'trackway' (or similar ground protection mats) will be used as an alternative to minimise ground disturbance. The internal haul routes will be removed and reinstated back to original use following the construction of the Sites. See **ES Volume 3 Appendix 9.1: FRA [EN0110014/APP/6.3.9.1].** A final Crossing Schedule of key infrastructure and environmental features will be provided for each stage of construction and secured via **Outline OCEMP [EN0110014/APP/7.1]** as per the draft DCO.

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	in section 8.6 of the flood risk assessment, the applicant has stated that "Access tracks will follow existing farm tracks, where possible, and will not represent new routes, although existing routes to be used would be upgraded and will be constructed to meet the same standards required for any new routes." The LLFA notes there are subtle inconsistencies between the emphasis on the use and upgrading of existing access tracks. The LLFA will consider the new and upgraded access tracks as an increase in impermeable area due to the materials and need for the materials to be compacted to such an extent that prevents the access tracks from being permeable. From a drainage perspective, the more open the grading is considered better for drainage, while from vehicle running structural perspective, a more dense grading is desired. The denser the build-up, the slower the rate of that water can permeate the surface and is likely to flow over the top of it, particularly if the fines happen to be compacted into the surface. For example, Type 1 material is not a porous surface and depending on the age and compaction then the surface could be as smooth and impermeable as concrete. While a Type 3 material is more open graded and more porous than a Type 1 material but is not completely permeable when compacted. Therefore, discharging at a greenfield runoff rate directly into the access track is unlikely to be achieved.		The type of crossing selected will be determined at detailed design and based on-site specific factors and in consultation with the relevant authority and secured via **Outline CEMP [EN0110014/APP/7.1].** Access tracks for maintenance will incorporate swales or filter drains at the downstream end of or parallel with the tracks.

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	With this in mind the LLFA would require more information from the applicant to demonstrate there is adequate space for a sustainable surface water drainage system for the access road and that a viable discharge location is identified. This is to ensure there is no increase in flood risk and there would be an opportunity to refine the proposed design as the development progresses. This approach is in accordance with both the principles of NPPF and the LLFA's Developer Guidance. In addition, any improvements or widening of the existing access tracks will also be considered as new access road areas. Further information is required.		
Water Environment	The LLFA notes the LLFA Developer Guidance has not been referred to in section 9.1.13. The LLFA reminds the applicant that NPPF paragraph 182.a is clear that developers should "take note" of the LLFA advice. The LLFA confirms the LLFA Developer Guidance forms part of the advice that the LLFA provide and that it should be taken note of. Further information is required. In section 8.2 of the FRA, the applicant states *"The surface water drainage strategy for the Site will be prepared in accordance with the guidance outlined in the CIRIA 'The SuDS Manual' C753, the DEFRA 'Non-statutory technical standards for sustainable drainage systems' and the NCC 'LLFA Statutory Consultee for Planning Guidance Document'."*	Yes	The Applicant has referred to the LLFA Developer Guidance in **ES Volume 3 Appendix 9.1 FRA [EN0110014/APP/6.3.9.1]** and in **ES Volume 1 Chapter 9: Water Environment [EN0110014/APP/6.1.9]**. A 'Plan B' surface water drainage strategy has been developed in the absence of infiltration testing (to be undertaken post consent) with a controlled discharge to watercourse. Further detail is provided in **ES Volume 3 Appendix 9.1 FRA [EN0110014/APP/6.3.9.1]**.

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	However, in the subsequent sections the applicant only references the Paragraph 5.8.15 of NPS EN-1 and paragraph 056 of the NPPF PPG states that surface water runoff disposal should firstly consider infiltration to ground. This is due to the LLFA's Developer Guidance providing different advice that is locally specific to the water stressed nature of Norfolk, where surface water is collected for use should be considered as the primary surface water disposal in accordance with the nationally applicable Water UK Sewer Sector Guidance Appendix C. Therefore, the applicant is not in accordance with the LLFA Developer Guidance and has not taken note of the LLFA advice in accordance with NPPF. Further information is required. Furthermore, the LLFA notes that without infiltration testing it is not possible at this time for the applicant to confirm whether infiltration is viable. Therefore, the assumption in the FRA is based on incomplete information at this time. Further information is required.		
Water Environment	The LLFA notes the applicant in section 8.3.5 to 8.3.6 that *"appropriate seeded vegetation will be provided below and between rows of the Solar PV Arrays to act as a level spreader/energy dissipater and to promote low erosivity sheet flow for the Scheme. The vegetation will be managed without pesticides and will either be mowed and/or used for light grazing."*	Yes	Discrepancies noted by the LLFA between (now) **ES Volume 1, Chapter 4 - Scheme Description [EN0110014/APP/6.1.4]** and **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]** have been resolved.

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	This is significantly more detail that has been committed to and is inconsistent with the proposed site description in Chapter 5 of the PEIR. In addition, the applicant states "it will also extend to all ground under the Solar PV Arrays." This implies a preference for the Single-Axis Tracker Panels shown in section 5.2.7 to 5.2.8 rather than the fixed PV Panels. However, in Image 5.1 the vegetation cover is shown to not be continuous. The LLFA notes there are further inconsistencies in the comment made in the FRA and the information provided in the support of the PEIR. Further information is required.		
Water Environment	In section 8.5, the LLFA notes the applicant discusses the Solar PV Panels design in terms of pile-driven posts. However, there is no consideration of the impact of the alternative concrete block design. Therefore, at present, this preliminary drainage design is incomplete as it does not consider the various design variations for the solar panels. Further work and consideration is required.	Yes	**ES Volume 3 Appendix 9.1: FRA [EN0110014/APP/6.3.9.1]** states the following in relation to use of concrete footings: Concrete footing supports may be utilised where there is a requirement to protect any underground assets/resources i.e. the steel supports will sit on top of the concrete footing rather than being pile driven into the ground. The locations of these footings are not known at this stage; however, their use will be limited and will be informed by detailed design and archaeological assessments. The indicative design of the supports is that they have typical dimensions of 4m length x 0.3m width x 0.3m depth, representing an area of 1.2m2 and a volume of 0.4m3 Their extents will therefore represent a negligible increase in impermeable area within the Order Limits.
Water Environment	In section 8.10, there is a very high-level application of the simple index approach for the assessment of water quality treatment for the surface water drainage systems. The applicant has stated that surface water will be discharged through a permeable pavement. In the context of the proposed design, the LLFA has already	Yes	Appropriate pollution measures have been set out in **ES Volume 1 Chapter 9 – Water Environment [EN0110014/APP/6.1.9]** and **ES Volume 3 Appendix 9.1: FRA [EN0110014/APP/6.3.9.1]**. It is not proposed to utilise infiltration for the Substation and BESS facilities due to pollution risk. The drainage systems of these elements of the Scheme will be

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	raised concerns that infiltration may not be possible along with the under-estimation of the impermeable area associated with the proposed development. In additional, the simple index approach is required to be applied to each of the discreet surface water management systems. The simple index approach for the permeable pavement for discharges to groundwater in the SuDS Manual states that specific design requirement is met (see table 26.4 in the SuDS Manual C753) and in the surface water Table too (Table 26.3 in the SuDS Manual C753). However, the information that has been provided to date is insufficient to determine whether this has occurred. Further information is required.		lined with an impermeable membrane to prevent potential ingress of pollutants to the underlying geology. Reference has been changed in the FRA from SuDS Manual Table 26.4 to Table 26.3 so the Simple Index Assessment undertaken within the FRA refers to discharge to surface waters rather than groundwater.
Water Environment	There is some initial information about fire suppression for the BESS facility. However, there is no information about the fire suppression for the either of the substations, both of which with have transformers and other infrastructure included onsite with specific fire control and drainage requirements. As this has not been considered, further information is required. The LLFA notes that as yet there has only been a tentative mention of the water management from the fire suppression systems, although this does not seem to relate to the various transformers required across the site. In section 8.10.3 and 8.10.4 discuss the management of fire water but only in relation to the BESS. There is no discussion on the fire suppression system and surface water management in	Yes	Transformers will be bunded with runoff from these areas transferred to a dump tank or similar facility for filtration separate to the wider drainage system. The BESS and Substations will incorporate a surface water drainage system lined with an impermeable membrane. Self-actuating penstock valves will be fitted at the downstream end of the BESS drainage system These will close upon activation of the fire alarm system. Substations will incorporate auto shut-off penstock/valves as required. The above mitigation measures are secured through the **OOEMP [EN0110014/APP/7.2].** Management of BESS including fire incidents is outlined in the **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]**.

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	relation to transformers on the site. The LLFA requires clarification of how these systems will interact with the surface water management to ensure there is no increase in flood risk or pollution to watercourses/ waterbodies. Further information is required.		
Water Environment	In section 8.10.7, the LLFA notes the applicant points out the operational phase will include maintenance activities but only for the ad hoc replacement of PV panels. There is no discussion on the full interim replacement of all PV panels approximately halfway through the proposed design life of the scheme. There is also no mention of the need to replace the BESS facilities up to 5 times during the lifetime of the scheme. This lack of consideration is relevant to the surface water drainage systems due to the regular need for construction compounds across the wider extent of the proposed development at regular intervals throughout the lifetime of the development. In section 8.11, there is no consideration of these known activities as part of either the construction or operational lifetime of the development. Further information is required. The LLFA notes in section 8.12 that some high-level aspects of the future maintenance and management have been considered. However, the information provided is not specific, does not provide time frames and is not appropriate. For example, there is no frequencies for when these activities would be undertaken. In addition, there is no consideration of variations across the site within the design. For example,	Yes	Construction compounds will appropriate surface water management and pollution measures installed which are outlined in the **Outline Construction Environment Management Plan (OCEMP) [EN0110014/APP/7.1]** and the **Outline Decommissioning Environmental Management Plan (ODEMP) [EN0110014/APP/7.3]**. Ground cover will be maintained via machinery. Further detail is provided in the **Outline Landscape Environmental Management Plan (OLEMP) [EN0110014/APP/7.4]**. A preliminary maintenance schedule for the proposed surface water drainage systems is provided in **OOEMP [EN0110014/APP/7.2]**.

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	in sections of the flood risk assessment and PEIR, the applicant indicates the use of livestock for grazing of land around the solar PV Panels, however in section 8.12.1 the applicant makes no mention of this approach for the pastures. At present, the maintenance and management plan lacks the appropriate amount of detail currently. The LLFA notes that as the development design progresses greater detail will be required. However, at this stage some further details are required.		
Construction and Decommissioning	It is understood that the operational life of the project is 60 years after which it is expected to take 1 – 2 years to decommission. Any decommissioning work will need to return the land to its original use removing all the solar panels (and any foundation works); cabling; and all other ancillary infrastructure associated with the Solar Farm. As such it will be necessary to ensure that these works are undertaken and that funding is available in the future for these works. The DCO will therefore need to have a "Decommissioning and Restoration Plan" Requirement covering a Traffic Management Plan (TMP); and an Environmental Management Plan (EMP). These Plans will need to be agreed by the relevant Planning Authority in consultation with appropriate bodies (e.g. Highway Authority). There should also be reference in the Requirement to the need for the promoter to enter into a legal agreement with the relevant planning authority to secure a Decommissioning and Restoration Bond ahead	Yes	An **Outline Decommissioning Environmental Management Plan (oDEMP) [EN0110014/APP/7.3]** has been submitted as part of the Application. This document establishes the overarching principles, commitments and management measures that will govern decommissioning and restoration of the Scheme, including the removal of specified infrastructure and the restoration of some of the land to its former use. The **oDEMP [EN0110014/APP/7.3]** provides the framework for the preparation of a detailed Decommissioning Environmental Management Plan (DEMP), which will be required to be submitted to and approved by the discharging authority prior to the commencement of decommissioning works. The detailed DEMP will include, as appropriate, a Traffic Management Plan and relevant Environmental Management measures for the decommissioning phase and will be prepared in consultation with the relevant authorities. East Pye Solar is a privately funded development. All financial risks associated with the construction, operation, and maintenance of the Scheme are borne by the developer. The commercial viability of the Scheme has been assessed as part of the developer's investment decision.

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	of commencement thereby safeguarding against any future eventuality should the developer's business fail (i.e. go into liquidation).		The **Funding Statement [EN0110014/APP/4.2]** submitted with the Development Consent Order (DCO) application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full.
Cultural Heritage	The pre-application/pre-determination archaeological evaluation trial trenching will only cover a relatively small part of the application area. Further archaeological trial trenching across the remainder application area, probably post-consent, secured through appropriately worded Requirements, will be necessary. Further trial trenching will form the first phase of a programme of archaeological mitigatory works.	No	This is noted by the Applicant. Further trial trenching is covered in **ES Volume 3, Appendix 10.6 Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]**.
Cultural Heritage	Cumulative Impacts on below-ground archaeological remains of all aspects of the proposed development will require mitigation, not a passive absorption of impacts. Cumulative Impacts on below-ground archaeological will require a sliding scale of differing types and levels of mitigation. There is not enough information at this stage to be prescriptive or provide sensible examples. Prior to extensive trial trenching it is felt that there is not enough information to make conclusions of the levels of sensitivity of the archaeological remains within the very, very large application site.	No	Effects on below-ground archaeological remains and respective mitigation measures are addressed in the **Environmental Statement (ES) Volume 1, Chapter 10: Cultural Heritage [EN0110014 /APP/6.1.10]**. Archaeological remains identified during trial trench evaluation have been identified as of low and medium sensitivity at present.

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Cultural Heritage	The beneficial impacts on below-ground archaeology of taking the application site out of arable cultivation only apply to below-ground archaeological. However, there remains issues surrounding the cumulatively impact associated with this proposed development. As mentioned above the relatively limited extent of the pre-application/pre-determination archaeological evaluation trial trenching will NOT be sufficient to fully determine the location and extent of archaeological mitigation.	Yes	This is covered in the **ES Volume 3 Appendix 10.6 Archaeological Mitigation Strategy [EN0110014 /APP/6.3.10.6]**. Precise details of areas that will be subject to archaeological mitigation will be defined following completion of the geophysical survey and informative trenching and finalisation of the location and extent of development impacts.
Transport and Access	No legislation but IEMA (Institute for Environmental Management and Assessment) is mentioned in 11.1.13	Yes	The assessment contained within **ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** has been carried out in accordance with the guidance within the IEMA Guideline July 2023 – which was proposed through the EIA scoping.
Transport and Access	Junction assessment will only be available in ES. Not enough time for highways to assess and address any issues if a major issue.	Yes	**ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]** has considered the LRN during all phases of the Scheme and the Applicant has provided Technical Notes regarding trip generation and impacts to NCC in October 2025. Through on-going engagement with NCC Highways, the Applicant has set out the forecast effects on the network and discussed the need for network assessments. The forecast effects are deemed not to require network modelling.
Transport a Access	Alternative access routes must be discussed with LHA as per 11.2.26.	Yes	**ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** have considered the access routes to the Scheme and the Applicant has provided Technical Notes regarding access routes to NCC in October 2025. The access strategy for the construction and operation of the Proposed Development has been discussed with NCC Highways. Refinements put forward by NCC have been taken on-board by the Applicant, including the proposal to use The Krons in preference to Fairstead Lane (west). The

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			Applicant will continue to engage with NCC through the planning for the construction of the Scheme.
Transport and Access	Hempnall roundabout needs further assessment which will be in the ES. Early involvement with NCC key to mitigation measures if they are required.	Yes	**ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** has considered Hempnall Roundabout and provided a Technical Note considering the impact of the Scheme on Hempnall Roundabout to NCC in October 2025. The Applicant continues to engage with NCC on the forecast effects of traffic associated with the construction and operation of the Scheme, including at the A140/B1527 Hempnall roundabout. **ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11] i**ndicate that the significance of effects on the roundabout (i.e. ATCs 01 to 04) are Negligible or Low during the reasonable worst case assessment of the construction period and Negligible during the operational period. Management Plans in the form of a CTMP, which encompasses a framework Construction Worker Travel Plan, and an Operational Traffic Management Plan are to be secured through the DCO, which will contain initiatives to manage transport and access during the construction and operational periods. Temporary and permanent access points will be design in accordance with the specifications required by NCC Highways. No further modifications are warranted to the Hempnall roundabout.
	Replacement phases seem ok, but at what stage in project life.		It was agreed with PINS to scope out the operational phase of the Scheme. **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** confirms the operational phase effects will be less than construction. An **Outline Operational Traffic Management Plan (OOTMP) [EN0110014/APP/7.7] has** been produced to consider the operational phase including the replacement phase. The anticipated replacement strategy is set out in the **OOTMP [EN0110014/APP/7.7]** and is referenced in **ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]**.
Transport and Access	Abnormal Indivisible Loads (AILs) will need to be confirmed with Norfolk Constabulary. Routes will be similar to Norwich to Tilbury proposals.	Yes	**ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** has considered AILs in all phases of the Scheme and identified appropriate management and mitigation measures. The final strategy for the movement of AILs will be carried out in accordance with the standard Movement Order

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			notification process – including notices to all affected Highway Authorities, police authorities and affected structures owners. That process is set out in the **OCTMP [EN0110014/APP/7.6]** which forms part of the DCO Application. The **draft DCO [EN0110014/APP/3.1]** will secure a detailed CTMP which will be prepared substantially in accordance with the **OCTMP [EN0110014/APP/7.6]**.
Transport and Acess	Local routes have not been discussed in great detail with the Highway Authority.	Yes	**ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** have considered the access routes to the Scheme and the Applicant has provided Technical Notes regarding access routes to NCC in October 2025. The access strategy for the construction and operation of the Proposed Development has been discussed with NCC Highways. Refinements put forward by NCC have been taken on board by the Applicant, including the proposal to use The Krons in preference to Fairstead Lane (west). The Applicant will continue to engage with NCC through the planning process to the construction of the Scheme.
Transport and Access	11.2.59 – This should be percentage increases rather than numbers as 400 daily vehicle trip increase will be catastrophic on some minor routes	Yes	**ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** has considered the transport impact of the Scheme in all phases, and construction trips for the Scheme are provided in both absolute numbers and percentage change. The assessment follows the general approach to undertaking EIA as detailed in **ES Volume 1, Chapter 2 Environmental Impact Assessment Methodology [EN0110014/APP/6.1.2]** and has been modified to align with industry standard IEMA guidance, which sets out thresholds for effects relevant to transport and access (severance, driver delay, pedestrian delay, non-motorised users, fear and intimidation, road safety and hazardous and large loads). The assessment of these is detailed in **ES Volume 1, Chapter 11 Transport and Access [EN0110014/APP/6.1.11].**
Transport and Access	Substation 2 if an AIL is required I am not sure the B1327 is an acceptable route. This would require Norfolk Constabulary's AIL team to confirm.	Yes	**ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** The **Environmental Statement [EN0110014/APP/6.1]** has considered AILs in all phases of the Scheme and identified appropriate management and mitigation measures.

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	Table 11.8 – The access arrangements will require S278 / SHWA. • Site area 1A - 1B – Option B would be the preferable with Lodge Road and Frith Way narrow road widths. • Site area 2A - 2C – Option C would be best. Option A, we would not want a new access to be located from the A140 which is part of the Strategic Road Network and Option B as per comment above. • Site area 3A - 3B – Either option more analysis required for Alburgh Road and Spring Lane. • Site Area 4A – Option ok. • Site Area 4B – Options ok. • Site Area 5A – 5B – Option ok - are we happy with 50-50 split onto The Street? • Site Area 6 – Option ok. • All site areas from 7A to 9 need to be looked at in depth. Fairstead Lane, The Krons, Broaden Lane, Littlebeck Lane, Shotesham Road, Woodton Road, Baxters Lane all not acceptable for two-way traffic for the amount of traffic required. Can CRC's 7, 8, 9 and 10 be utilised • with crossing points across the highway. • Site Area 10A – 10E – option ok. Table 11.9 – needs to be reviewed as per comments above.		The final strategy for the movement of AILs will be carried out in accordance with the standard Movement Order notification process – including notices to all affected Highway Authorities, police authorities and affected structures owners. That process is set out in the **Outline Construction Traffic Management Plan (oCTMP) [EN0110014/APP/7.6]** which forms part of the evidence base for the DCO Submission. The DCO will secure a detailed CTMP which will be prepared substantially in accordance with the oCTMP. The Applicant has considered the access routes to the Scheme and provided a Technical Notes regarding access routes, including internal haul roads, to NCC in October 2025. This has been considered as part of **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11].**

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Transport and Access	11.4.7 and 11.4.8 – Bus stops and routes need to be kept open / discussed with the local bus companies.	Yes	**ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** have considered the bus stops and routes within the Study Area of Scheme in all phases. The management of bus stops and services during the construction of the scheme will be confirmed through the delivery of the CTMP which will be prepared substantially in accordance with the OCTMP **[EN0110014/APP/7.6]**.
Transport and Access	11.4.9 to 11.4.13 – what mitigation are you proposing if any temporary closures / diversions are required.	Yes	The management of the LRN during the construction of the scheme will be confirmed through the delivery of the CTMP which will be prepared substantially in accordance with the **OCTMP [EN0110014/APP/7.6]**. That will include details of access proposals and the mechanisms to discharge construction and removal of temporary site accesses and permanent access points. That Technical Approval will include the definition of temporary traffic management measures required. Traffic management and works will be notified through the NCC permitting process.
Transport and Access	11.4.14 to 11.4.21 – I would expect traffic survey counts to be undertaken during the summer period too.	Yes	**ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** have considered the impact of the Scheme on the LRN in all phases and provided baseline traffic survey data which was collected at a network neutral period (i.e. not coinciding with any school holiday periods or bank holidays where traffic flows are abnormal). Forecasts have additionally been calculated to the peak Scheme construction year (2029) using Tempro, which is an industry standard practice for estimating future baseline flows on the highway network.
Transport and Access	Table 11.14 – • Fairstead Lane 134.62% increase general traffic and 182.29% increase for HGVs on a substandard network as mentioned previously. • Littlebeck Lane 40.66% increase general traffic and 44.59% increase for HGVs on a substandard network as mentioned previously. • Shotesham Road 55.34% increase general traffic and 182.29% increase for HGVs on a substandard network as mentioned previously.	Yes	The Applicant has provided Technical Notes regarding access routes and trip generation to NCC in October 2025, which is detailed in **ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]**. Following consultation with NCC, the proposed access strategy to sites 7-9 has been revised based on the use of internal haul routes between Sub-Sites 7A-F, 7G-L and 8A-B, alongside additional mitigation measures such as the use of vehicle holding areas and adherence to designated routes (as detailed in the **OCTMP [EN0110014/APP/7.6)**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	• The Green 41.7% increase general traffic and 27.63% increase for HGVs on a substandard network as mentioned previously. • Wash Lane 32.77% increase general traffic and 32.24% increase for HGVs on a substandard network as mentioned previously. • Baxters Lane 14.42% increase general traffic and 27.22% increase for HGVs on a substandard network as mentioned previously. 11.6.11 to 11.6.16 – please refer to comments above in this document, regarding the substandard network.		A full assessment of likely effects on the highway network, including percentage change to traffic flows, is detailed in **ES Volume 1, Chapter 11 Transport and Access [EN0110014/APP/6.1.11]** and has been prepared using industry-standard IEMA guidelines.
Transport and Access	No mention of the times that the traffic movement will be on the network or if any time restriction is being proposed i.e. missing peak AM 08:00 to 09:00.	Yes	The Applicant has considered the impact of the Scheme on the LRN in all phases and identified mitigation including a commitment that construction deliveries and collections by HGV will be scheduled to arrive and depart between 09.30 and 16.30 to avoid peak traffic periods. The construction working times are set out in the **OCTMP [EN0110014/APP/7.6].**
Transport and Access	11.9.5 – Very little discussion has been had with the developer.	Yes	A highways meeting with NCC took place in July 2025 and subsequently engaged via email and meetings from September 2025 to February 2026. The Applicant continues to engage with NCC Highways, including during the development and refinement of the **ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**
	Table 1.1 • Peak numbers 98 HGV movements – is this over the whole scheme or at each site area. • Average daily 32 is quite high, again is this over the whole scheme or at each site area. If this for the whole project and there is more than 1 work site at any one time (eg:1 East of A140, and one West) will mitigate these numbers. How is this going to be captured / shared.		The peak daily HGV number of 98 and 32 movements represents a scenario where all Sub-Sites and the CRC are built out simultaneously. This can be considered a worst-case scenario and in reality the Sub-Sites and CRC will be built out in stages subject to detailed design and final construction programme. **ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]** and **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** have considered the LRN during all phases of the Scheme and the Applicant has provided Technical Notes regarding trip generation and impacts to NCC in October 2025.

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			The proposed governance of the construction phases is set out in the **OCTMP [EN0110014/APP/7.6].** Detailed proposals will be agreed through the CTMP to be secured by the DCO.
Transport and Access	1.1.6 - average workers per month is 258 but peak is 479 workers.	Yes	The forecast profile of worker requirements is based on previous experience and indicative construction programme. The Applicant has prepared a Framework Construction Worker Travel Plan (FCWTP) which is contained within the **OCTMP [EN0110014/APP/7.6]** and analysed in **ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1].**
Transport and Access	1.1.7 – 50% minibuses, how will this be monitored / captured. Is an Outline Workers Travel Plan being considered.	Yes	The Applicant has considered the impact of the Scheme on the LRN in all phases and identified mitigation including provision of a FCWTP contained within the **OCTMP [EN0110014/7.6].** A final FCWTP will be produced as a DCO Requirement and will include suitable targets for mode share and a monitoring regime.
	Currently all that is being done is listing the PRoWs in the area. What mitigation are being proposed for any of the PRoW's that may need diverting, temporary closures etc.		The Applicant has prepared an **Outline Public Rights of Way and Permissive Paths Management Plan [EN0110014/APP/7.8]** which identifies PRoW closures, diversionary routes and management and mitigation measures.
Transport and Access	Norfolk Constabulary AIL team will be consulted and will undertake route analysis with highways feedback.	Yes	he final strategy for the movement of AILs will be carried out in accordance with the standard Movement Order notification process – including notices to all affected Highway Authorities, police authorities and affected structures owners. That process is set out in the **OCTMP [EN0110014/APP/7.6]** which forms part of the evidence base for the DCO Submission. The DCO will secure a detailed CTMP which will be prepared substantially in accordance with the **OCTMP [EN0110014/APP/7.6]**.
Ground Conditions	Norfolk County Council, in its capacity as the Mineral and Waste Planning Authority (MWPA) for Norfolk, has been involved in discussions with the applicant's consultant regarding mineral resources and the potential for impacts from the proposed scheme, as noted in Table	No	The Applicant will continue consultation and further engagement with Norfolk County Council in regard to Mineral and Waste management.

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	16.2, in Chapter 16-Ground Conditions of the PEIR). As noted in those discussions the PEIR Non-Technical Summary states that it is proposed that the Solar Panel framework will be secured to the ground using metal posts either driven or screw mounted into the ground (PEIR NTS paragraph 5.1.6), or where a non-intrusive solution is required, using pre-cast concrete blocks as anchors. Therefore, this will result in minimal impact to any underlying mineral resources for the operation of the proposed development. The proposed development has an anticipated lifespan of 60 years. Paragraph 5.1.2 of the PEIR Non-Technical Summary states that "The operational life of the Scheme is anticipated to be up to 60 years. Once the Scheme ceases to operate, the Scheme will be decommissioned, apart from the National Grid Substation and its associated infrastructure."		
Ground Conditions	Following on from the MWPA's response to the Scoping report, the MWPA is pleased to note that the Mineral Resource Assessment, PEIR Appendix 16.2, contains at Table 3.1 information showing the underlying geology within each sub-site, or cable route corridor (CRC) part. Table 3.3 of the Mineral Resource Assessment (MRA) contains an estimate of the potential mineral resource within each sub-site and CRC part. Paragraph 3.3.1 of the MRA notes that mineral resources within the sub-	No	The Applicant welcomes this comment.

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	sites for the panels, will be sterilised for the duration of the Scheme. However, this sterilisation is temporary and would cease following the decommissioning of the Scheme in 60 years' time. Paragraph 3.3.2 notes that the Battery Energy Storage System (BESS), the National Grid Substation and the Point of Connection (POC) are not underlain by a safeguarded mineral resource.		
Other Environmental Matters	The MWPA considers that the PEIR has appropriately assessed the potential for the Scheme to sterilise safeguarded mineral resources. There would a limited impact from sterilisation and the removal of material along parts of the CRC. Paragraph 18.5.1 of the PEIR NTS states that a Site Waste Management Plan (SWMP) will be developed to establish how waste and materials are managed during construction, and that there will be a focus on reuse of waste. The principle of reuse should also be applied to arisings from excavations such as the cable route through both the SWMP and the Soils Management Plan/Soils Resource Management Plan. The MWPA considers that for this Scheme, ground investigations can take place as a requirement post-consent that can feed into the Construction Environmental Management Plan regarding potential reuse of materials arising during the construction phases. The table on page 21-22 of Chapter 16-Ground Conditions of the PEIR outlines the steps that have been agreed between the applicant and the MPA	Yes	The assessment of waste landfill and waste handling capacity for Norfolk has been included in Section 18.5 of **ES Volume 1, Chapter 18: Other Environmental Matters [EN0110014/APP/6.1.18]** as requested by Norfolk County Council as the local MWPA. The assumption in relation to provision of new landfill capacity is based on the MWPA being required to identify future landfill requirement. However, to ensure a robust assessment methodology, the assessment has not relied upon this. This has led to the embedded methodology for waste handling and landfill capacity to be assessed at the East of England regional level, based on the expectation that landfill capacity in Norfolk is likely to be significantly adversely affected by the Scheme if it were considered in isolation.

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	regarding information to be provided in the Environmental Statement of the details of the Scheme, and the methodology for the reuse of mineral excavated in the construction phases (see also paragraph 16.2.11).		
Other Environmental Matters	In conclusion, the MWPA considers that the issue of mineral resource safeguarding has been correctly addressed in the PEIR, and that the embedded mitigation that will be carried forward into the ES and subsequent work post-consent will enable the Scheme to appropriately address the issue and therefore not result in needless sterilisation of safeguarded mineral resources. The MWPA notes the additional details included in the PEIR regarding waste, and that the Scheme will prioritise waste prevention, followed by reuse, recycling and recovery, in accordance with the Waste Hierarchy. The MWPA will comment further when the application is submitted, and additional information is provided within the DCO documentation	Yes	The Applicant notes this comment and confirms that it is committed to the application of the waste hierarchy to minimise waste from the Scheme. This is set out in the **OCEMP [EN0110014/APP/7.1]** and secured by the relevant requirement in Schedule 2 to the d**raft DCO [EN0110014/APP/3.1]**.
Human Health	Norfolk County Council (NCC) Public Health notes that the PEIR omits a standalone health chapter in line with PINS' Scoping Opinion. However, it would be beneficial for the Human Health section in Chapter 18 to include a clear summary and conclusion of the identified health effects and their significance, rather than signposting to other chapters without additional information.	Yes	A Human Health Summary Statement has been provided as part of **ES Volume 1, Chapter 18 - Other Environmental Matters [EN0110014/APP/6.1.18]**. This provides context and further information on the likely health effects of the Scheme, based on other technical assessments.

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Electromagnetic Fields	NCC Public Health welcomes the consideration of electromagnetic fields (EMFs) and their potential impact on human health and notes the provisional conclusion that resulting impacts will be minor and not significant. However, it is noted that the estimated magnetic field strength of 95 µT is close to the 100 µT reference limit for magnetic fields, leaving little margin for error in either the assessment or subsequent operational impacts.	Yes	The Applicant has provided an assessment of the impact of EMF in **ES Volume 1, Chapter 17 – Electromagnetic Fields [EN0110014/APP/6.1.17]**. The assessment has considered the maximum voltage possible and therefore any changes to the subsequent operational impacts will be the same, or decrease the level of impacts. 95 µT is the maximum magnetic field at 1m above ground, directly above the centreline, for an underground cable. The field strength is shown to diminish rapidly to insignificant levels such as 5m from the centreline, which is more likely to be the impact in practice.
Human Health	However, as stated in NCC Public Health's response to the applicant's Scoping Report, whilst physical impacts may be considered insignificant, perceived risks associated with EMFs can still contribute to stress and anxiety within local communities. As such, NCC Public Health would therefore welcome further consideration of the potential mental health and wellbeing effects linked to these perceptions. Clear, transparent, and ongoing communication is essential to allay public concerns surrounding EMFs.	Yes	**The Equalities Impact Assessment [EN011001/APP/7.19]** provides a population level assessment of the Scheme regarding mental health, including consideration of stress and anxiety due to perceived risks. Overall, the assessment concludes that there may be remaining negative mental health impacts during the construction of the Scheme, and that during operation these impacts, including for stress and anxiety regarding EMF's are considered neutral on a population level. The Applicant consulted the local community in an accessible manner; project communications lines were open 5 days a week from 9am to 5pm to answer and/or clarify any questions or concerns. The Applicant would also welcome and engage with ongoing discussions.
Human Health	There is currently no mention of mental health impacts in the PEIR. As outlined in NCC Public Health's response to the applicant's scoping report, it is expected that consideration is given to the mental health impacts of the project, particularly in relation to resident perceptions of neighbourhood quality and EMFs (as per point 3). Chapter 19 identifies that the combined effects of significant visual impacts and minor adverse effects (e.g. noise, socioeconomics, water environment) are likely to result in a significant adverse incombination effect on local residents and users of the area during the	Yes	**The Equalities Impact Assessment [EN011001/APP/7.19]** provides a population level assessment of the Scheme regarding mental health, including consideration of impacts on mental health of a range of Scheme effects, assessed by theme. This inherently includes consideration of combined effects. However, the EQUIA methodology itself does not require specific in-combination, cumulative or significance criteria to be applied. It is not considered appropriate to include mental health as a topic within the ES as there is no agreed national or industry body guidance regarding assessing the level of significance of effect on mental health in EIA terms, and human health as a standalone assessment was agreed to be scoped out of the ES with the Planning Inspectorate.

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	Scheme's operation. However, the mental health implications of these cumulative effects are not discussed and NCC Public Health would welcome their inclusion in the ES.		
Human Health	Chapter 18 states that "access to existing PRoW would not be affected", however NCC Public Health would support further clarification within the Environmental Statement that access will not be affected either temporarily or permanently during any phase of the project. If any PRoWs are affected, NCC Public Health would expect appropriate alternative routes and/or mitigation measures to be proposed.		Effects on PRoW are considered in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**, which provides a full list of the PRoW which are to be temporarily closed (short term and long term), alongside proposed diversionary routes. Mitigation and management measures on all PRoW affected is also detailed in the **PRoW and Permissive Paths Management Plan [EN0110014/APP/7.8]**.
Air Quality	In relation to air quality, NCC Public Health notes that the preliminary assessment of construction and decommissioning road traffic emissions on sensitive human receptors concludes that impacts are "Not Significant," but further note that traffic data will be refined for the Environmental Statement and a full assessment of the potential effects resulting from road traffic emissions on existing human receptors will also be undertaken in the ES. Furthermore, NCC Public Health welcomes the commitment to assess key sources of PM2.5 emissions associated with the Scheme and to detail the measures that will be implemented to minimise both PM2.5 and its precursors in the ES.	Yes	An assessment of construction and decommissioning road traffic emissions, including $PM_{2.5}$, is presented in **ES Volume 1, Chapter 13: Air Quality [EN0110014/APP/6.1.13].** Specific measures aimed at reducing emissions of $PM_{2.5}$ and its precursors are included in Section 13.7 of **ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13]**. This assessment found the Scheme's magnitude of impact to be negligible and not significant on human receptors at both Construction and Decommissioning phase.
Air Quality	In addition, NCC Public Health notes that the Construction Dust Risk Assessment concludes a high risk of construction dust impacts in the absence of mitigation.	Yes	An updated construction dust risk assessment is provided in **ES Volume 3, Appendix 13.1 Construction and Decommissioning Dust Risk Assessment [EN0110014/APP/6.3.13.1]** and includes recommended construction dust mitigation measures based on the outcomes of the assessment. These mitigation measures are included in and secured through the **Outline**

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	The proposed mitigation measures are welcomed, and NCC Public Health wish to seek assurances that these measures will form an integral part of the Outline Construction Environmental Management Plan (OCEMP). In particular, NCC Public Health supports the proposal to include real-time PM10 continuous monitoring as part of the Dust Management Plan, which would allow for active monitoring of construction impacts and adjustment of site operations where necessary. In addition to PM10, NCC Public Health would support extending the monitoring to PM2.5 to ensure that finer particulate matter, which is known to have greater health impacts, is also effectively monitored and managed throughout the construction phase.		**Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]**. The recommendation for real-time particulate matter (including $PM_{2.5}$) monitoring is noted. The technology selected for PM monitoring will take into account the IAQM's Position Statement on 'Use of Low-Cost Sensor Systems for PM_{10} in the Vicinity of Demolition and Construction Sites and Considerations of PAS 4023:2023'.
Human Health	NCC Public Health notes the commitment to assess cumulative effects on human health in the Environmental Statement and would expect this to include both physical and mental health impacts. We also note that Chapter 19 confirms that cumulative air quality impacts will be addressed in the Environmental Statement, and further comment will be provided at that stage. NCC Public Health notes the commitment to set out additional mitigation measures in the Environmental Statement to reduce the Scheme's impacts on human health and wellbeing. Further clarity on the nature and scope of these measures would be welcomed.	Yes	Cumulative effects on a range of human health impacts have been outlined in the **Chapter 18 Other Environmental Matters [EN0110014/APP6.1.18].** This also includes mitigation measures relevant to human health from the relevant technical assessments referenced, no additional human health mitigations above and beyond these have been identified. Mitigations include those referenced in the following assessments: • **ES Chapter 6 Climate Change [EN0110014/APP/6.1.6];** • **ES Chapter 7 Landscape and Visual [EN0110014/APP/6.1.7];** • **ES Chapter 9 Water Environment [EN0110014/APP/6.1.9];** • **ES Chapter 11 Transport and Access [EN0110014/APP/6.1.11];** • **ES Chapter 12 Noise and Vibration [EN0110014/APP/6.1.12];** • **ES Chapter 13 Air Quality [EN0110014/APP/6.1.13];** • **ES Chapter 14 Socio-Economics [EN0110014/APP/6.1.14];**

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			• **ES Chapter 15 Soils and Agricultural Land [EN0110014/APP/6.1.15]** • **ES Chapter 16 Ground Conditions [EN0110014/APP/6.1.16];** and • **ES Chapter 17 Electromagnetic Fields [EN0110014/APP/6.1.17].**
Socio-Economics	From an employment and skills perspective, Norfolk County Council welcomes the commitment to an Outline Skills, Supply Chain and Employment plan (SSC&EP). To ensure these commitments are meaningful, deliverable, and aligned with Norfolk's strategic ambitions for skills development and local labour market outcomes, the County Council requests that the Outline Skills, Supply chain and Employment Plan (SSC&EP), to be submitted with the DCO Application, incorporates and clearly addresses the following: Alignment with Norfolk's NSIP Employment and Skills Framework - The Council has developed a framework to guide expectations for Nationally Significant Infrastructure Projects (NSIPs) in Norfolk (see attached spreadsheet). The County Council ask that the SSC&EP responds directly to this Framework, which outlines tiered levels of commitment expected from developers, including: • Supplying local labour needs across construction and operational phases. • Apprenticeship starts and completions. • Engagement with education (site visits, curriculum input, work experience).	Yes	An **Outline Employment, Skills and Supply Chain Strategy (OESSCS) [EN0110014/APP7.10]** has been produced and submitted with the application which sets out a strategy for how local opportunities will be maximised. The Strategy has been aligned to Norfolk County Council's NSIP Employment and Skills Framework.

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	• Employment brokerage or supply chain mapping to help connect local SMEs and jobseekers to opportunities.		
Socio-Economics	Securing and Monitoring Delivery - The SSC&EP should outline mechanisms for ensuring the delivery of commitments, including: • Targets for local employment and apprenticeships. • A named liaison responsible for working with the County Council and local education/training providers. • Participation in a Skills and Employment Monitoring Group, reporting outcomes annually	Yes	A Delivery and Monitoring Plan is set out within the **OESSCS [EN0110014/APP/7.10]**. A detailed ESSCS will be prepared and submitted prior to the commencement of construction. The implementation of the detailed ESSCS will be secured through a Requirement in the **draft DCO [EN0110014/APP/3.1]** for the Scheme. Therefore, a breach of commitments made would be a criminal offence.
Socio-Economics	Engagement with the Local Supply Chain - As outlined in the PEIR, local procurement is a key part of the skills ecosystem. The SSC&EP should detail: • How local contractors and suppliers will be identified and supported to bid. • A register or portal where job openings and sub-contracting opportunities will be advertised locally	Yes	The **OESSCS [EN0110014/APP/7.10]** details opportunities and how they will be promoted. This includes potential contractors and suppliers as well as potential employment opportunities as a result of the Scheme.
Socio-Economics	Skills/Employment legacy • An outline within the SSC&EP of the skills/employment legacy for the local area during the operational period for the proposed solar farm.	Yes	The **OESSCS [EN0110014/APP/7.10]** details how apprenticeships will be utilised in addressing both address skill shortages and to provide local residents with pathways into meaningful employment. The Applicant will explore opportunities to work with schools, colleges and local authorities to deliver targeted outreach activities focused on renewable energy and STEM careers. This may include school talks, curriculum linked workshops, and participation in established initiatives such as the local schools and Norfolk & Suffolk Careers Hub. These activities will support the development of future skills pipelines by encouraging educational pathways leading to STEMbased careers relevant to the delivery of largescale infrastructure projects.

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Socio-Economics	Response to the Preliminary Environmental Information Report Chapter 14 – Socio-Economic document; • 14.6.2. 217 full-time equivalent (FTE) jobs - can you provide detailed breakdown of the specific job roles and entry requirements for the 217FTE roles or equivalent. • Table 14.21. Can you provide approximate numbers for each role outlined and at what stage and duration of the construction process they will be required. • 14.6.20. How will you work to mitigate the large proportion of roles you have anticipated will be from 'elsewhere', and what initiatives will be put in place to increase those employed from South Norfolk and Norfolk overall? Norfolk County Council would welcome further engagement with the Applicant ahead of the DCO submission to help shape a targeted and deliverable SSC&EP that ensures Norfolk's residents and businesses benefit from the opportunities this Project presents	Yes	A detailed assessment of the likely significance of effects of the Scheme on employment has been included in **ES Volume 1, Chapter 14: Socio-Economics [EN0110014 /APP/6.1.14]**. The chapter reports an average of 278 workers over the 24-month construction phase with a peak of 720 workers. Table 14.27 provides an estimated overview of the job roles and skills requirement for the construction workforce. **An OESSCS [EN0110014/APP7.10]** has been produced and submitted with the application which sets out a strategy for how local opportunities will be maximised. NCC and SNDC were consulted upon in January 2026 during formulation of the Strategy and their feedback integrated into the submitted version.
BESS	While acknowledging that the PEIR makes specific reference to an Outline Battery Safety Management Plan (OBSMP); any plan will need to be agreed by Norfolk Fire and Rescue Service (through a Planning Requirement in the final DCO). Risk control recommendations for all Battery Storage (BESS) installations should be subject to a suitable fire risk assessment and the development and production (amongst others) of the following strategies and plans:	Yes	The Applicant's **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]** stipulates at the detailed design stage of the Scheme will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, the selected BESS design will have completed LSFT to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. All requisite emergency planning requirements for the Scheme are stipulated in Section 4.4 and Section 5 including the requirement that ERPs shall be

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	• A risk reduction and mitigation strategy that covers the design, construction, installation, operation and decommissioning phases of the project to minimise the impact of an incident. • An emergency response plan in consultation with Norfolk Fire & Rescue Service, which details site specific information regarding the hazards, locations of hydrants or stored water supplies, electrical isolators, measures to be taken during an incident and responses required post incident. Coordination should also include regular onsite training and familiarisation for operational fire service personnel. • An environmental impact and risk assessment must be completed. This must include firefighting water run-off including containment and treatment as necessary. Air pollution must also be considered. • A transport strategy to minimise the impact of additional vehicle movements and prevent an increase in the potential number of traffic incidents, especially in largely rural settings. Where appropriate, these plans should be supported with specific fire tests. Property insurers should be involved at an early stage in discussions to agree on a suitable fire strategy for BESS installations. The potential for both property loss and business interruption should be considered. The fire protection and mitigation strategy should be determined on a case-by-case basis, based on battery technology type, BESS site location, layout, compartment construction, system criticality, and other relevant factors. It should		maintained and reviewed by the BESS operator, any amendments or changes will be fully agreed with NFRS who are a statutory consultee for the Scheme. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study **[EN00110014/APP/7.5]** to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS Compound. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which assess short-term air quality impacts on sensitive receptors. The concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO_2) and particulates (PM_{10}) from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the OBSMP. The Plume Study demonstrated that there were no significant impacts on any sensitive residential receptor location with 1km of the BESS compound. A risk assessment of the potential impact on visibility has also been undertaken for nearby road and rail receptors. The predicted visibility distances in the event of a BESS fire are greater than safe stopping distances for roads and rail. Section 4.5.11 of the OBSMP stipulates: *at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a BESS incident to sensitive receptors within a 1km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out). Production of particulate matter (PM) and a visibility*

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	be multilayered and include a combination of; good design, thermal runaway avoidance, early detection, and automatic suppression. Manual fire control provision and planning, including water supplies, should be commensurate with BESS and other site fire hazards.		*impact assessment on transport links within a 1km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.* *The ERP could contain the following measures or protocols relating to air quality for sensitive receptors located downwind from a fire plume. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally:* *Notification of potentially affected residents including advice on the health effects of smoke and ways to reduce exposure (e.g. close windows and stay indoors) in the event of a BESS fire.* *Should there be a BESS fire in close proximity to a Public Right of Way (PROW) or Bridleway, the site operator is to determine wind direction from the BESS area weather station and seek to close a PROW or Bridleway, if deemed necessary.* Section 4.5 of the OBSMP also documents details of the drainage system strategy for the BESS site, the Environment Agency (EA) is a statutory Consultee for the Scheme and must approve the pollution control mechanisms for the drainage strategy. Comprehensive BESS safety requirements are documented in Section 3 of the OBSMP, content covers all elements of BESS safe design and Section 4 covers all firefighting requirements for the Scheme. The implementation of the oBSMP is secured through a Requirement in Schedule 2 of the DCO. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant

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			planning authority in consultation with NFRS, the EA, prior to the commencement of the works for the BESS. The BMSP will be substantially in accordance with this oBSMP.
BESS	Specific risk control measures to help minimise the risk or consequence of BESS fires include: • BESS rooms and buildings shall be dedicated-use, i.e. not used for any other purpose and accessible only by those required to operate, maintain, test, or inspect the BESS equipment. • Locate BESS systems in non-combustible containers or enclosures at least 3 metres from other equipment, buildings, structures, and storage. This distance shall only be reduced when: a) a suitable firebarrier (minimum 1-hour fire rated) is installed between the BESS unit and exposed buildings/ structures, b) exposed surfaces (typically exposed walls) are fire-resisting and blank (i.e. no openings), or c) BESS enclosures are constructed with fire-resisting blank walls and roofs. • Walk-in containers and other enclosures used to house BESS equipment should not exceed the dimensions of long “high cube” shipping containers, i.e. maximum dimensions, 16.2m long, 2.6m wide, 2.9m high	Yes	An **Outline Battery Safety Management Plan (oBSMP) [EN0110014/APP/7.5]** has been submitted as part of the Application. The oBSMP establishes the overarching principles, controls and management measures that will be implemented to ensure the safe design, construction, operation and decommissioning of the Battery Energy Storage System (BESS) forming part of the Scheme. The BESS design selected for the Scheme will conform to the stipulated BESS enclosure requirements. The oBSMP sets out the key fire safety and risk management provisions that are likely to be incorporated into the design of the BESS, including the application of the Health and Safety Executive’s hierarchy of controls, the use of recognised UK and international good practice guidance, and the incorporation of appropriate engineering, administrative and monitoring controls. It also confirms that the BESS will be designed in accordance with relevant National Fire Chiefs Council guidance and that a Plume Analysis Study has been undertaken to assess potential emissions, visibility and human health effects in the event of a thermal runaway incident. NFCC 2026 guidelines allow reduced separation distances if suitable design features can be introduced. Section 3.1.22 of the OBSMP stipulates that: *the BESS system selected at detailed design will have undertaken LSFT and utilised rigorous site-specific consequence modelling reports to demonstrate that in the event of a BESS failure loss will be safely limited to one BESS enclosure without the intervention of NFRS.* *LSFT of the selected BESS design to establish minimum equipment spacing distances and site-specific consequence modelling will provide a clear, evidence-based case for the final BESS area installation plans at the detailed design phase and will be agreed with NFRS. An independent Fire Protection Engineer specialising in BESS will validate all UL 9540A, LSFT, and / or third-*

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			party test and site-specific consequence modelling data which has been provided. By way of a Requirement secured in the draft Development Consent Order, prior to the commencement of construction of the BESS, the Applicant will be required to prepare a detailed Battery Safety Management Plan in accordance with the oBSMP. The detailed plan will take account of the latest good practice in battery failure prevention and detection, consequence modelling, risk analysis and emergency response planning, and will be submitted to and approved by the discharging authority in consultation with Norfolk Fire and Rescue Service and the Environment Agency.
BESS	• BESS systems should be at least 15 metres from building HVAC air inlets. • Where installation of BESS equipment in rooms forming part of buildings with other occupancy types cannot be avoided, these should be separated from other areas by minimum 2-hour fire rated construction. • The Battery Management Storage (BMS) should be configured to monitor potential failure conditions that could lead to a thermal runaway and shut down and isolate BESS units where any such conditions are detected.	Yes	The Applicant's **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]** Section 3.2 stipulates that the BESS BMS provides safety functions which are fully compliant with NFPA 855 (2026) requirements and NFCC guidance. BESS will be located more than 15 metres from any building structure with HVAC inlets. Only dedicated BESS enclosures will house BESS equipment.
BESS	• For critical and significant BESS installations, install early detection of off-gases/electrolyte-vapour from thermal runaway events, interlocked to shut down and disconnect the BESS. This may be combined with deployment of an extinguishing agent flooding system (based on the fire control strategy). • Provide smoke detection systems for all BESS equipment rooms and compartments, interlocked to shut down and disconnect the BESS. This may be combined with deployment	Yes	The Applicant's **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]** covers all requirements for detection and suppression systems in Sections 3.1.30 and 3.1.31. Detection and suppression system design will be compliant with NFPA 855 requirements and NFCC guidance.

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	of an extinguishing agent flooding system (based on the fire control strategy). • BESS areas within sprinklered buildings and all BESS installations where sprinkler protection forms part of the fire strategy, should be provided with sprinkler protection, designed to provide a minimum density of discharge of 12.2mm/min over an assumed fire area of 230m2 (or area of room if smaller).		
BESS	• BESS rooms and enclosures should be provided with suitably designed explosion overpressure venting. • Suitable procedures shall be implemented to routinely inspect and test BESS thermal runaway and fire mitigation alarms and systems. Greater separation distances may be appropriate from critical buildings and installations and to meet specified strategic spatial fire separation expectations. Note: Whilst automatic fire suppression is unlikely to extinguish fire in individual battery cells that are undergoing thermal runaway, fire suppression can reduce fire intensity and assist in slowing and limiting fire propagation across battery modules and racks. It may be acceptable to reduce some of the above risk control measures where large scale testing, such as testing to UL9540A or equivalent, demonstrates that adjusted mitigation measures are adequate. • Ensure that sufficient water is available for manual firefighting. An external fire hydrant should be in close proximity of the BESS containers. − The water supply should be able	Yes	The Applicant's **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]** covers all aspects of explosion protection and prevention in Sections 3.1.30 and 3.1.31. NFCC 2026 guidelines allow reduced separation distances if suitable design features can be introduced. Section 3.1.22 of the **OBSMP [EN0110014/APP/7.5]** stipulates that: the BESS system selected at detailed design will have undertaken LSFT and utilised rigorous site specific consequence modelling reports to demonstrate that in the event of a BESS failure loss will be safely limited to one BESS enclosure without the intervention of NFRS. LSFT of the selected BESS design to establish minimum equipment spacing distances and site specific consequence modelling will provide a clear, evidence-based case for the final BESS area installation plans at the detailed design phase and will be agreed with NFRS. An independent Fire Protection Engineer specialising in BESS will validate all UL 9540A, LSFT, and / or third party test and site specific consequence modelling data which has been provided.

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	to provide a minimum of 1,900 l/min for at least 2 hours (dependent upon the design). Further hydrants should be strategically located across the development. These should be tested and regularly serviced by the operator. If insufficient flow is available, then stored firefighting water must be provided to supply this design requirement.		Section 3.1.30 details how if installed, internal BESS suppression system will be fully compliant with NFPA 855 (2026) standards and NFCC (2026) guidance. Section 4.3.2 of the OBSMP confirms the BESS area will contain a minimum of two firefighting water storage tanks of no less than 230,000 litres in capacity, capable of delivering 1,900 litres per minute for 4 hours (exceeding NFCC guidance). The BESS area will be designed to integrate firefighting to integrate pressure fed (pump driven) fire hydrants fed from water tanks. Hydrants will be located in consultation with NFRS to provide redundancy and safe operating distances for firefighters. Testing and servicing requirements will be agreed with NFRS at the detailed design stage
BESS	• The site design should include a safe access route for fire appliances to manoeuvre within the site (including turning circles). An alternative access point and approach route should be provided and maintained to enable appliances to approach from an up-wind direction. • The emergency response plan should be maintained and regularly reviewed by the occupier and any material changes notified to NFRS. • Relevant Health & Safety signage must be provided which offers warning of any hazards and risks at the site.	Yes	The Applicant's site design is fully compliant with revised NFCC guidance published in February 2026. **The Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]** covers all elements of NFRS site access and H&S signage in Section 4.2. All requisite emergency planning requirements for the Scheme are stipulated in Section 4.4 and Section 5 including the requirement that ERPs shall be maintained and reviewed by the BESS operator, any amendments or changes will be fully agreed with NFRS who are a statutory consultee for the Scheme. The implementation of the oBSMP is secured through a Requirement in Schedule 2 of the DCO. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the EA, prior to the commencement of the works for the BESS. The BMSP will be substantially in accordance with this oBSMP.

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Major Accidents and Disasters	Where plans make use of photovoltaics panels across multiple sites, the design of the development should consider ways to contain and restrict the spread of fire through adequate separation between the panels. It should include a safe access and egress routes for fire appliances to be able to reach the structures. Ideally an alternative access point and approach route should be provided to counteract any prevailing winds that may hamper firefighting operations. Its design should meet the latest required standards in electrical safety and consider at all times any design developments in electrical safety such as failure cut out and safety switches at the location of the panels and any interconnecting equipment to other sites, substations and energy storage sites. There should be a regime of regular maintenance to the panels to reduce the risk of fire, such as regular inspection, cleaning and temperature checks which may give early warning of failure to a panel. Should there be areas of vegetation surrounding the panels, it should be well kept and not left to overgrow, which could increase the chances of fire spread should a fire occur.	Yes	These comments are noted by the Applicant and have been considered in application documents. Table 4.1 of **ES Volume 1, Chapter 4: The Scheme [EN0110014/APP/6.1.4]** details distancing between solar PV rows on the basis of two options of PV technology that the Scheme may deploy. Option A (Single-Axis Tracker Panels) would have a minimum distance of 2.5m between rows and a maximum 15m between solar module centrelines. Option B (Fixed South Facing PV Arrays) would have a minimum distance of 2.5m between panels and a maximum distance of 14m between solar module centrelines. The **Outline Operational Environmental Management Plan [EN0110014/APP/7.2]** sets out the general site arrangements and mitigation and monitoring measures for the operational and maintenance phase of the Scheme. **Outline Battery Safety Management Plan (oBSMP) [EN0110014/APP/7.5]** details BESS safety provisions including mitigation measures and safety mechanisms embedded into the design of the BESS infrastructure. This includes confirming emergency vehicles can safely access the BESS compound from the highway from two different locations and circulate around the internal road network within the BESS Site and compound. As detailed in ES Volume 3, Appendix 7.18 - Design Principles, Parameters and Commitments [EN0110014/APP/7.18] Final BESS design and layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any Fire and Rescue Service intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS Enclosures or Energy Storage System (ESS) equipment. Testing requirements will comply with National Fire Chief's Council and/or the National Fire Protection Association NFPA 855 standards and guidelines relevant at the time of detailed design.

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BESS	The Applicant will need to consult with Norfolk Fire and Rescue Service (NFRS) regarding any potential on-going work needed post completion with regard to the inspection of sites (BESS facilities). Any costs associated with this proposal as it affects NFRS on-going work will need to be met by the applicant; along with any facilities required such as a new fire station or appliances. This should be covered through an accompanying legal Agreement. Should any of these recommendations be omitted from the design of the development without explaining the reasoning, or no reasonable effort made to meet the recommendations by alternative measures to minimise any impacts during an Emergency situation, then the Emergency response expected from Norfolk Fire and Rescue Service may not go as expected, which could lead to a detrimental outcome at the development and its surrounding areas.	Yes	The Applicant notes this and welcomes further engagement with Norfolk Fire and Rescue Service.
Cumulative Impact	While recognising the sustainable benefits of this project in terms of delivering on national targets on low-carbon energy, the County Council has serious concerns about the cumulative impacts of this proposal sitting alongside other approved and proposed NSIPs in South Norfolk; and other energy related development in the area. This includes the major grid connection works being carried out adjacent to Norwich Main associated with the consented Hornsea Three offshore wind farm; and the proposed new 400 kV overhead power line running between Norwich and Tilbury (DCO awaiting submission). 4.5 The County Council is also concerned at the lack of a strategic approach to the siting	Yes	The assessment of cumulative scheme is set out within the technical chapters of the (**ES: Chapters 6-18 [EN0110014/APP/6.1.6 - 6.1.8]**), with the full list of cumulative schemes assessed provided in ES: Appendix 2.4 Cumulative Schemes **[EN0110014/APP/6.1.6 - 6.3.2.4]**. This includes the other relevant NSIP projects, Table 2.3 of the Appendix lists the Schemes and the assessment of likely effects in relation to the Applicant's Scheme. It concludes that Norwich to Tilbury is likely to have overlap in temporal scope during the construction and operational phase and for Hornsea Project Three Windfarm this is likely at the operational phase. A requirement to decommission the Scheme is part of the DCO application (see Requirement 21 of the draft DCO); failing to comply with that requirement would be a criminal offence. The Applicant has produced an Outline **Decommissioning Environmental Management Plan [EN0110014/APP/7.3]** as part of the EIA submitted with the DCO application. A final decommissioning strategy will be prepared and agreed with the relevant authorities at that time of

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	solar farms across the County and the cumulative impacts associated with multiple large scale solar farms will have on Norfolk's environment; and local communities and businesses affected. There are further concerns regarding decommissioning given the longevity of Project and the potential risk this poses for future generations should the project financially fail. As such it felt that a financial bond would be needed to safeguard against the above concerns.		decommissioning pursuant to the DCO Requirement and will include detailed measures and timescales. The Scheme must then be decommissioned in accordance with the approved plan. The Applicant notes that there is no policy requirement for a decommissioning fund to be imposed and paragraphs 2.10.138 to 2.10.143 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments. The Applicant considers that Requirement 21 complies with paragraphs 2.10.138 to 2.10.143 of NPS EN-3. The Secretary of State has considered this point in previous decisions for solar projects under the Planning Act 2008 and determined that imposing a decommissioning fund requirement is not necessary (for example, see Oaklands Solar Farm). This is consistent with paragraph 4.1.17 of NPS EN-1 which stipulates that the Secretary of State should only impose requirements that are, amongst other things, necessary, and the requirement in paragraph 4.1.17 of NPS EN-1 that only relevant requirements should be imposed.
The Scheme	As indicated above a 400 kV National Grid Substation is needed for the project to connect into the existing 400 kV transmission network. It is proposed that this would be located to the south of Great Moulton (see Site Map A), close to the existing 400 kV power lines. For the new National Grid Substation, the existing overhead line would, it is understood, need to be repositioned with the provision of new and/or replacement pylons. Two site options are considered in the PEIR for the proposed new National Grid Substation comprising a site to the North of Site 1 (South of Great Moulton); and a site to the South of Site 1 adjacent to the Battery	Yes	The Applicant notes this. As explained in the **Design Approach Document [EN0110014/APP/7.17]** An environmental appraisal (RAG rating exercise) was undertaken for the two options for the location of the National Grid Substation. Primarily owing to the approval of the solar farm (ref. 2024/3817) during the period of the statutory consultation, the location of which overlapped with Option 1, Option 2 located in Sub-Site 1B was taken forward as the location of the National Grid Substation (as presented at the targeted consultation). However, Option 2 was also considered preferable from a flood risk and landscape and visual perspective owing to the proximity of Option 1 to the Starston Brook floodplain and the requirement for PRoW diversion. The impact of solar developments (both existing and forthcoming) in the areas surrounding the Scheme have been fully assessed in each relevant chapter and summarised in **ES Volume 1, Chapter 19: In-Combination Effects Assessment [EN0110014/APP/6.1.19].**

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	Energy Storage System (BESS); and East Pye Substation. This latter option is favoured as it would be further away from Great Moulton and would consolidate transmission infrastructure into one area avoiding: a wider visual impact; and disruption during construction.4.8 The Applicant has indicated that grid connection from the Substation could involve new overhead lines (i.e. new pylons). Further clarification on this issue is needed given the close proximity to the nearby settlement of Great Moulton. It is felt that the applicant should use underground cables where possible to connect to the existing 400 kV line and should avoid constructing any new Pylons in the area. The applicant should therefore explore undergrounding any infrastructure needed alongside potential route realignment options. The County Council would have serious concerns to any new pylons in the area. In addition there needs to be further detail on all the proposed Substations in terms of their design and scale, as well as further detail on the landscape mitigation needed to accompany this element of the Project. 4.9 The Grid Connection infrastructure above needs to be considered in the context of National Grid's proposed Norwich to Tilbury overhead power line (400 kV). As such there will need to be a cumulative impact assessment (CIA) undertaken as part of the Environmental Statement. Alongside the above Pylon project the CIA will need to consider other emerging NSIP energy projects, including the Tasway Energy Park proposal; and BESS infrastructure		The potential impacts from the Tasway Energy Park were not included at PEIR stage as the project entered the public domain during the statutory consultation period for this project. The project has now been placed on indefinite hold. As detailed in ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/5.12], Before any electrical work begins, up to 4 new pylons will be built along the proposed diversion route leading into the new National Grid Substation. These pylons will eventually carry the circuits away from the old alignment and into the new infrastructure. Temporary pylons may also be installed to help maintain the flow of electricity during the transition. The Applicant has developed a double circuit turn in solution as this enhances the operational efficiency and resilience of the transmission network and delivers long term maintenance benefits whilst also allowing for the decommissioning and removal of the existing section of overhead line, thereby reducing long term visual and environmental impacts on the local area.

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	being proposed under the Town and Country Planning Act.		
The Scheme	The PEIR states that there are currently two options for the PV panels which are being considered; either fixed south facing PV Arrays that would be installed at between 15 and 35 degrees which a maximum hight of 3.5 or single axis tracker arrays that would be orientated north/south and would operate between 60 degrees from the horizontal (facing east in the morning) moving toward 0 degrees (horizontal) at midday, and up to 60 degrees from the horizontal (facing west in the evening) that would have a maximum height of 4.5m. The County Council would favour the option with the least visual and landscape impact (i.e. the fixed panels). However, it is accepted that through further design work and appropriate mitigation there may be opportunities for combining both fixed and tracking arrays in different parts of the proposed sites.	Yes	The Applicant notes this comment. One of the options being considered by the Applicant is a Single-Axis Tracker fixed panel, which is fixed to the mounting structures, aligned in north south rows, and incline to the east or west up to a maximum inclination of 60 degrees from horizontal. The modules would track from east to west throughout the day and would return to their resting position 60 degrees (facing east) over night. The Solar PV Panels would have a maximum height of 4.5m. Option B for the Scheme is Fixed South Facing Arrays, aligned in east west rows, and slope towards the south at a fixed slope of 10 to 35 degrees from horizontal. This is detailed in **ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**. The Applicant will confirm the preferred option at a later stage and as a result of additional design work, however for the purposes of the EIA, technical topics have assessed either Option A or Option B dependant on which option assumes a worst-case scenario.
Soils and Agriculture	This loss of Best and Most Versatile (BMV) land (i.e. loss of productive agricultural land) raises concerns particularly in the context of other Projects for similarly large-scale solar farms within the County totalling almost 4,000 Ha (including this project). While the operational lifetime of the project is up to 60 years and the works are therefore temporary and reversible; this still raises issues regarding the immediate loss of BMV land over a sustained period of time. Notwithstanding the temporary nature of the proposed development and the potential benefits to the soils and biodiversity, there are concerns at the cumulative impacts of solar	Yes	The areas of each ALC grade affected by the Scheme are set out in Table 15.7 of **ES Volume 1, Chapter 15: Soils and Agriculture [EN0110014/APP/6.1.15]**. There is no excellent quality Grade 1 land. **ES Volume 1, Chapter 5: Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5]** and **Site Selection Assessment [EN0110014/APP/7.20]** sets out the methodology for site selection, including brownfield sites, and alternative layouts. The Applicant has considered ALC grade in its site selection for the Scheme, seeking to avoid BMV land when assessing appropriate sites. **ES Volume 1, Chapter 15: Soils and Agricultural Land [EN0110014/APP/6.1.15]** addresses potential wider effects on food production

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	farm developments across the County and the lack of a strategic approach to the siting of renewable projects to minimise the impact on BMV land. There are also concerns that this could result in the loss of more traditional patterns of farming leading to reduced food security. These issues will need addressing in the ES.		and the wider rural economy. The assessment reviews current farming practices and potential farming practices and assesses the effects from changes to farming activities throughout the whole life of the Scheme. Cumulative effects from other NSIP Schemes at High Grove [EN0110010], The Droves [EN0110013] and EcoPower Suffolk [EN0110019] are covered in section 15.11 of **ES Volume 1, Chapter 15: Soils and Agricultural Land [EN0110014/APP/6.1.15].**
Transport and Access	The County Council as Highway Authority has serious concerns about the construction of the project as there has been inadequate engagement to date with either the Applicant or their Highway Consultant on construction traffic management matters. This could lead to unsuitable roads being used to for construction traffic and potentially effect emergency response times for the Blue Light Services. An Outline Construction Traffic Management Plan (OCTMP) is needed as part of any ES to demonstrate how construction traffic will be managed during the construction Phase; as well as an Outline Traffic Management Plan (OTMP) covering the operational phase of the Solar Farm taking into account maintenance traffic for both the Solar Farm and the National Grid Infrastructure. Furthermore the OTMP will need to address emergency response by Norfolk Fire and Rescue Service to any potential incident associated with the Solar Farm; BESS; and / or grid connection (Substation) infrastructure.	Yes	A highways meeting with NCC took place in July 2025 and subsequently engaged via email and meetings from September 2025 to February 2026. The Applicant continued to engage with NCC Highways, including during the development and refinement of the **Transport Assessment [EN0110014/APP/6.3.11.1]** and the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** has considered construction vehicle routing and access proposals, alongside identifying appropriate management and mitigation measures in the **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]**. An **Outline Operational Traffic Management Plan [EN0110014/APP/7.7]** has also been prepared for submission with the DCO which includes proposals for access to the BESS and substation. Swept path analysis for the BESS compound is provided in the **Transport Assessment [EN0110014/APP/6.3.11.1].** An **Outline Battery Safety Management Plan [EN0110014/APP7.5]** has also been produced.
Glint and Glare	There are concerns as Highway Authority regarding the potential impacts arising from glint and glare on the highway network and the	Yes	**ES Volume 3, Appendix 18.1: Glint and Glare Assessment [EN0110014/APP/6.3.18.1]** has considered potential impacts upon roads A140

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	potential implications on highway safety. The County Council would expect the impacts on all receptors to be thoroughly considered and suitable mitigation measures taken forward as part of the DCO application process. As such there are concerns regarding glint and glare until such time as the impacts are fully understood and appropriate mitigation measures are put forward; tested; and agreed by stakeholders including the Ministry of Defence; the Civil Aviation Authority; the Highway Authority; and National Highways.		and B1527. Where required, suitable mitigation measures have been proposed and considered to effectively mitigate significant impacts.
Landscape and Visual	The PEIR acknowledges there will be short term adverse landscape impacts arising from construction prior to any long-term mitigation. Mitigation will be determined through the ES process after the design of the project is progressed. The PEIR concludes that overall the Project will result in some significant landscape and visual effects during both the construction and operational phases without further mitigation. Given the likely visual impacts arising from this proposal over an extensive area, there needs to be more rigorous assessment of the impacts and cumulative impacts with other Projects (e.g. Norwich to Tilbury Pylon Project) as well as a clear indication of the mitigation measures needed as part of the Environmental Impact Assessment (EIA). Therefore, at this stage there are significant landscape concerns with the proposed development.	Yes	Cumulative landscape and visual impact assessment is produced as part of **ES Volume 1, Chapter 7: Landscape and Visual [EN010168/APP/6.1.7]**. Prior to the implementation of any mitigation (embedded or additional), the Scheme has the potential to affect (beneficially or adversely), during the Construction, Operation and Maintenance, and Decommissioning Phases by altering of the landscape temporarily. The assessment assessed operational Year 1 and Year 15, demonstrating the effectiveness of the landscape mitigation planting once the vegetation has established. Based on the assessment, the number of adverse significant effect would largely reduce in Year 15 in both landscape and visual receptor.
Needs Case	While acknowledging the wider strategic need for energy security and the move away from	Yes	While Climate Change is a global issue, local co-operation is necessary to mitigate the effects.

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	fossil fuels, the Project does not bring any direct or immediate benefit to Norfolk in terms of providing clean energy to existing or planned homes and businesses. As currently set out, the Project would see the electricity generated going direct into National Grid's 400 kV network and not into the immediate local distribution network. The County has significant planned housing and employment growth and as such consideration should be made by the Applicant, National Grid and UKPN at this early stage in the NSIP process as to how Norfolk could potentially benefit from any new electricity infrastructure in terms of clean energy supplies in line with the County Council's Climate and Economic Strategies. The Applicant needs to actively engage with Norfolk County Council and other key stakeholders, including National Grid and UKPN, to explore and provide clarity as to how the above strategic benefits for the County can be realised.		The Applicant has been in continued dialogue and engagement with Norfolk County Council on a regular basis, and other stakeholders including National Grid and UKPN. The Applicant intends to continue this approach.
Socio-Economics	The PEIR estimates that the construction phase will support an average of 258 workers per day, which is equivalent to 217 full-time equivalent (FTE) jobs. The estimated on-Site workforce is expected to peak at approximately 694 workers, equivalent to 583 FTE jobs. In addition the PEIR suggest that a further 660 indirect jobs will be supported during construction. Of these jobs the PEIR indicates: 73 are anticipated to be for people living in South Norfolk, 181 elsewhere in Norfolk, 252 in the rest of the East of England,	Yes	**ES Volume 1, Chapter 14: Socio-Economics [EN0110014 /APP/6.1.14]** provides an updated assessment of the employment effects of the Scheme and assesses effects of the construction workforce on the temporary accommodation market. The Socio-Economic chapter now reports an average of 278 workers over the 24-month construction phase with a peak of 720 workers. In addition, a further 360 indirect jobs are now estimated. Of the 1,044 total direct and indirect workers, 29 are estimated to provide employment for people living in South Norfolk, 116 elsewhere in Norfolk, 261 in the rest of the East of England and 638 outside the region. There is the potential for some of the construction workforce to have to temporarily relocate to the area thereby requiring temporary accommodation. The chapter estimates that of the 720 peak workers, 360 may

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	and 501 outside the region. The Construction phase will have a potential adverse impact on the housing market resulting from the influx of construction jobs. The number of permanent jobs post construction is not known although the PEIR suggests this could be as low as just 15 full time equivalents (FTEs).		require temporary accommodation and identifies sufficient capacity within the temporary accommodation market to accommodate this potential demand. An **Outline Employment, Skills and Supply Chain Strategy [EN0110014/APP7.10]** has been produced which sets out a strategy for how local employment opportunities will be maximized.
Socio-Economics	The PEIR indicates that an Outline Skills, Supply Chain and Employment Plan (SSC&EP) will be prepared for the DCO Application in consultation with relevant consultees. While the preparation of Outline SSC&EP is welcomed, in order to ensure these commitments are meaningful, deliverable, and aligned with Norfolk's strategic ambitions for skills development and local labour market outcomes, an Outline Employment and Skills Strategy (OESS) should be submitted with the DCO Application; or be prepared as a requirement of the DCO process. The Environmental Impact Assessment (EIA) will also need to assess the wider economic impacts arising from the above development both in terms of the Project coming forward on its own and in combination with other major projects in the area, such as the Norwich to Tilbury Pylon Project; and any other potential Solar Farms.	Yes	An **Outline Employment, Skills and Supply Chain Strategy [EN0110014/APP7.10]** has been produced and submitted with the application which sets out a strategy for how local opportunities will be maximized. **Environmental Statement (ES) Volume 1, Chapter 14: Socioeconomics [EN0110014 /APP/6.1.14]** provides a cumulative socio-economic assessment of the Scheme combined with the socio-economic effects of other identified developments.
Community Benefits	The Applicant will need to consider appropriate compensation packages for those homes and businesses directly affected by both the construction works, and any long-term impacts. The County Council would expect the Applicant to fully engage with those local communities	No	The Scheme is anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities and provide skills and training opportunities.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	affected by this development; and for the EIA and Environmental Statement (ES) to reflect that engagement. Whether through the formal DCO process or post DCO, there would be an expectation that the Applicant will provide and take forward a Community Benefit Fund. Reference to a community benefit fund specifically designed to mitigate and compensate for any local impacts to residents and businesses should be scoped into the ES as part of any wider consideration of impacts on local communities and business.		The Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The Applicant will work with Norfolk County Council and South Norfolk Council, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefiting from the available funds. The Community Benefit Fund is separate from the DCO process and is not bound by the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.

1.23 Norfolk Wildlife Trust

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Ecology and Biodiversity	Potential impacts on Hempnall Beck and on springfed fen habitats within and surrounding CWSs	Yes	Potential impacts on Hempnall Beck and springfed fen habitats as a result of the Scheme has been fully assessed and set out in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8].** No likely significant effects and no residual effects are anticipated during construction, operation or decommissioning due to HDD being utilised to avoid the Lowland Fen habitat and the Scheme design incorporating avoidance of all watercourses.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Ecology and Biodiversity	Impacts on statutory and non-statutory sites, priority habitats and protected species.	Yes	Potential impacts on statutory and non-statutory designated sites and protected species as a result of the Scheme have been fully assessed and set out in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8].** No likely significant effects and no residual effects are anticipated during construction, operation or decommissioning.
Noise and Vibration	Potential impacts to protected and non-protected species, day and night, through construction and potentially operation (generator/substations). This is especially relevant where sub-stations are in the vicinity of woodlands.	Yes	Potential impacts on biodiversity as a result of the Scheme have been fully assessed and set out in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8].**
Construction and Decommissioning	Impacts to habitats and species during construction	Yes	Potential impacts on biodiversity as a result of the construction phase of the Scheme have been fully assessed and set out in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8].**
Cumulative Impact	In combination impacts of other solar farm proposals in the area in terms of landscape connectivity.	No	Cumulative and in-combination impacts on the landscape have been fully assessed and are set out in **ES Volume 1, Chapter 7- Landscape and Visual [EN0110014/APP/6.1.7].**
Reasonable Alternatives and Design Evolution	We recommend some alternative sites are selected for panel areas and the cable route to avoid impacts on ecologically sensitive areas. Detailed comments are given below.	Yes	The **Site Selection Assessment [EN0110014/APP/7.20]** and **Design Approach Document [EN0110014/APP/7.17]** set out the process undertaken to select the Sites and detail the design evolution that has informed where and why infrastructure is located across the Scheme. **ES Volume 1, Chapter 5 - Alternatives and Design Evolution [EN0110014/APP/6.1.5]** further explores design evolution and the reasonable alternatives considered as part of the Scheme's development.
Ecology and Biodiversity	Potential impacts to bats at night – avoidance and attraction, depending on species. Potential avoidance/disturbance to birds. Further research into these impacts is required.	No	The **OLEMP [EN0110014/APP/7.4]** provides long term management guidance which will ensure the sensitive management of habitats potentially used by roosting bats (including created woodland parcels which may eventually offer roosting potential within the Scheme's lifespan) and includes the enhancement and management of buffer habitats surrounding known bat roosts sites. Further information is presented in **ES Volume 3, Appendix 8.5 - Ground Level Tree Assessment Report [EN0110014/APP/6.3.8.5]**. This achieves long-term habitat enhancement delivery for bats.

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			The **OLEMP [EN0110014/APP/7.4]** also sets out the methods by which operational activities (most notably panel/battery replacement works) will be managed to avoid, minimise and mitigate any adverse ecological effects.
Design Principles	While we welcome the inclusion of the principles listed in the section 'Environmentally-led design', it must be ensured that these intentions translate in to on the ground positive gains for nature. As they stand, the Design Principles given in Appendix 5.1 of the PEIR are quite weak and we recommend that these are strengthened by adding more detail covering the issues we list below. At this point, the exact details of mitigation are not yet clear so we are reliant on these design principles to ensure the best outcomes for nature are delivered.	Yes	The Applicant has prepared a **Design Approach Document (DAD) [EN0110014/APP/7.17]** which explains how the design principles developed for the Scheme (as set out in Table 3.1 of the **DAD [EN0110014/APP/7.17]**) have influenced the design of the Scheme and have been a key consideration in decisions that have been made. The document sets out how the design principles have been created in accordance with the criteria for good design for energy infrastructure as outlined in Footnote 102 of NPS EN-1, design principles 'should take into account any national guidance on infrastructure design'. From Section 4.4, the **DAD [EN0110014/APP/7.17]** attributes each design change to a relevant design principle. Section 6.3 goes on to explain the measures taken pertinent to each design principle, this includes specific design choices, the drivers of design decisions and where the application of these design principles can be demonstrated. Whilst the design principles themselves are not secured as they are guiding principles for the design, the outcomes they have resulted in through design decisions taken, such as embedded mitigation and enhancement measures and design parameters, are committed to within the relevant control documents. These control documents, such as the **OLEMP [EN0110014/APP/7.4]** and the **Design Parameters and Commitments [EN0110014/APP/7.18]** will be secured by requirement within the draft DCO [EN0110014/APP/3.1]. Further details on the relevant secured documents are set out in Section 6.1 of the **DAD [EN0110014/APP/7.17]**.
Design Principles	We raise the point that the exact details of mitigation are not yet clear and as such the consultation timetable does not allow us to comment on the mitigation proposals as they have not been published. Details will also need to be provided to give information on how delivery will be monitored and reported on.	No	The Applicant has prepared a **DAD [EN0110014/APP/7.17]** which explains how the design principles developed for the Scheme (as set out in Table 3.1 of the **DAD [EN0110014/APP/7.17**]) have influenced the design of the Scheme and have been a key consideration in decisions that have been made. The document sets out how the design principles have been created in accordance with the criteria for good design for energy infrastructure as outlined in Footnote 102 of

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			NPS EN-1, design principles 'should take into account any national guidance on infrastructure design'. From Section 4.4, the **DAD [EN0110014/APP/7.17]** attributes each design change to a relevant design principle. Section 6.3 goes on to explain the measures taken pertinent to each design principle, this includes specific design choices, the drivers of design decisions and where the application of these design principles can be demonstrated. Whilst the design principles themselves are not secured as they are guiding principles for the design, the outcomes they have resulted in through design decisions taken, such as embedded mitigation and enhancement measures and design parameters, are committed to within the relevant control documents. These control documents, such as the **OLEMP [EN0110014/APP/7.4]** and the **Design Parameters and Commitments [EN0110014/APP/7.18]** will be secured by requirement within the **draft DCO [EN0110014/APP/3.1]**. Further details on the relevant secured documents is set out in Section 6.1 of the **DAD [EN0110014/APP/7.17]**.
Ecology and Biodiversity	2.4 aims to create new woodland belts and native tree planting. In terms of planting, we recommend a mixture of natural regeneration or planting is used. Natural regen in areas around existing woodlands would provide ecotones of shrubs and rough grassland and be beneficial to a range of species.	Yes	The Green Infrastructure Strategy (Figure 2) within the **OLEMP [EN0110014/APP/7.4]** identifies a range of proposed landscape measures including linear trees and broadleaf woodland alongside areas of scrub and proposed grassland creation. Collectively measures will create a diverse range of new habitats across the Order Limits which will be beneficial to a range of species. Measures will be secured by Requirement 7 of the d**raft DCO [EN0110014/APP/3.1]** which will provide further detail on the proposed plant mixes, implementation and management.
Soils and Agriculture	2.6 states that soil health will be improved. Details are required as to how will this be measured and monitored.	Yes	The benefits for soils are described in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN01101114/APP/6.1.15].** Monitoring is described in Chapter 15 and in the **OSRMP [EN0110014/APP/7.9]** which has been submitted as part of the **draft DCO [EN0110014/APP/3.1].**
Landscape and Visual	We recommend rewording 2.9 to consider peoples' opportunities for connection to nature, rather than just "experience".	Yes	This has been updated to "peoples' connection to nature, experience and access".
Ecology and Biodiversity	3.2 aims to integrate the scheme in to the surrounding environment. One of the key	No	Breeding bird survey information (**ES Volume 3: Appendix 8.1 Ecological Desk Study and Extended Habitat Survey [EN0110014/APP/6.3.8.1]**) shows

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	principles of our Claylands Wilder Connections project was the importance of the permeability of the landscape and ecological connectivity. Whilst we support the principle of having fencing that allows movement of larger animals such as badgers through the landscape, predator proofing has the benefit that it is likely to improve the nesting success of ground nesting birds. As such, we recommend that certain fields are fully fenced to allow for this. These areas should be based on the results of nesting bird surveys which have been undertaken to ensure that the key fields are targeted.		that the site does not support ground-nesting species of open habitats, other than skylark, and fields utilized for solar will be unsuitable for nesting purposes, therefore fields will not be fully fenced to prevent mammal access. Skylark mitigation/avoidance measures are provided within **ES Volume 3, Appendix 8.8 Outline Protected Species Mitigation Strategy [EN0110014/APP/6.3.8.10].**
Ecology and Biodiversity	3.3 mentions the NWT Norfolk Claylands initiative. This project aims to restore and reconnect hundreds of hectares of habitat across this ancient landscape of South Norfolk. We are working with land managers and our partners to deliver the Lawton Principles. Primarily this involves improving ecological connectivity by enhancing the habitats across the countryside – the hedges, trees and copses; ponds; meadows, commons, margins and verges. Alongside this, we aim to ensure that remaining habitats are positively managed for wildlife and suitably buffered. Permeability of the landscape is an important element of this and we believe that solar farm fields should be stepping stones for wildlife, rather than blockages that are hard to survive in, or navigate past. We would be happy to provide guidance and advice and work with you to help us realise this vision. You can find more details on our website.	Yes	These recommendations have been considered within the production of the **OLEMP [EN0110014/APP/7.4]** and the **Design Parameters and Commitments [EN0110014/APP/7.18]** which is secured by requirement within the **draft DCO [EN0110014/APP/3.1]**.

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Ecology and Biodiversity	3.3 also mentions the LNRS. The Norfolk and Suffolk LNRS is due to be published in autumn. We strongly recommend that the LNRS mapping tool is used to shape the delivery of nature recovery for this scheme, tying in opportunity areas from the LNRS with the proposed scheme mitigation	Yes	The DCO submission includes the provision of the **Biodiversity Net Gain Report [EN0110014/APP/7.23]** and the Scheme's **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24].** The BNG assessment has been undertaken in reference to the Norfolk LNRS. Matters in relation to habitat enhancements are secured in the **OLEMP [EN0110014/APP/7.4].**
Landscape and Visual	We recommend that the minimum buffering distances outlined in table 5.1 of the PEIR are included in the design principles point 3.4. Buffering is an important part of ecological design, and this should be made explicit. Buffers need good protection during the construction phase e.g. suitable fencing and must not be used for vehicle or material storage.	No	The parameter has evolved, and the minimum buffering distances are now embedded in the design. These recommendations have been considered within the production of the **OLEMP [EN0110014/APP/7.4]** and the **Design Parameters and Commitments [EN0110014/APP/7.18]** which is secured by requirement within the **draft DCO [EN0110014/APP/3.1]**.
Scheme Description	At this stage there is little information provided about ongoing management, but this will be key over a 60 year period. Details of this will need to be provided.	Yes	Details of how landscaping and planting will be maintained over the operational lifetime of the Scheme are set out in the **Outline Landscape and Ecological Management Plan (LEMP) [EN0110014/APP/7.4]**.
Ecology and Biodiversity	With regards to BNG, at this stage, there is not enough detailed information provided to form an opinion around BNG/nature recovery targets, although we welcome the principles that are outlined. We recommend that a target of at least 20% BNG is sought. The Consultation information only states that BNG will provide hedgerow planting and enhancement, habitat creation and enhancement and management of grassland under the panels themselves. We would be happy to provide advice and guidance to help ensure that the best design can be achieved.	Yes	The DCO submission includes the provision of the **Biodiversity Net Gain Report [EN0110014/APP/7.23]** and the Scheme's **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24].** Matters in relation to habitat enhancements are secured in the **OLEMP [EN0110014/APP/7.4].** The Scheme will deliver a BNG of at least 10% for habitats, hedgerows and watercourses. The Applicant does not intend to commit to a 20% BNG.

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Ecology and Biodiversity	We strongly recommend that habitat creation objectives should consider local conservation priorities and provide benefits for priority species where possible and which should include a variety of habitat types. Solar farm developments should consider alternative habitats to grassland where this is suitable. For example, pockets of woodland, scrub and ponds can be incorporated into solar farm design in areas where shading on solar panels is avoided. Note, shading of ponds should also be avoided so this needs to be considered in the design. Woodland and scrub can be managed by coppicing on a shorter rotation to avoid panel shading. Coppicing creates a dense woodland structure which is more suitable for nesting birds. Woodland within solar farms is also protected from deer browsing, which has a negative impact on woodland in the wider landscape. These factors should be carefully considered when Biodiversity Net Gain assessments are undertaken.	Yes	This advice has been received and considered during the Scheme's design process. The DCO submission includes the provision of the **Biodiversity Net Gain Report [EN0110014/APP/7.23]** and the Scheme's **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].** Non-grassland habitats included within the created habitat design are: ghost pond restoration, deciduous woodland planting, tree belt planting, mixed scrub creation and tree planting. Grassland creation has largely been included due to the removal of open arable farmland and grassland can be utilised by ground nesting birds in favour or arable farmland. This would not be the case if all greenspaces were utilised by scrub/woodland/pond habitats.
Ecology and Biodiversity	Other habitats which could be created on site include areas of rough or tussocky grassland, which require less management and provide habitat for species such as reptiles, small mammals, and birds of prey. Field margins and corners can be enhanced by sowing native nectar-rich and/or winter bird seed mixes as well as being used to create arable plant areas. Management that includes cultivation to create areas of bare ground can help arable plants establish and benefit wide range of wildlife. Woody material from any unavoidable hedgerow or tree works on site can also be	Yes	This advice has been received and considered during the Schemes design process. The DCO submission includes the provision of the **Biodiversity Net Gain Report [EN0110014/APP/7.23],** and the Schemes **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].** Targeted ghost pond restoration has been included within the Schemes design as well as tussocky grassland, flower rich pollinator grassland and neutral grassland providing a varied mix of grassland habitats and therefore potential ecological niches. Detailed of creating habitat piles utilising onsite woody material is also included within the **OLEMP [EN0110014/APP/7.4]** as well as invertebrate hotels and hedgehog nest boxes.

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	used to create features for amphibians, reptiles, and invertebrates including hibernacula and log piles. Ponds are also important –either new or restored, as well as giving consideration to those on farmland adjacent to the solar fields.		
Ecology and Biodiversity	Any habitat creation or restoration included as part of the proposal should maximise its contribution towards the restoration of ecological connectivity and delivery of the emerging Nature Recovery Network. We recommend that the project should seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects, including the emerging Norfolk and Suffolk Local Nature Recovery Strategy.	Yes	The DCO submission includes the provision of the **Biodiversity Net Gain Report [EN0110014/APP/7.23],** and the Schemes **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24].** The BNG assessment has been undertaken in reference to the Norfolk LNRS and has targeted habitats listed within Areas that Could Become of Importance to Biodiversity (ACB) for habitat creation including mixed scrub, neutral grassland and woodland creation. Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].**
Ecology and Biodiversity	We recommend that a long-term monitoring plan is built in to the project from the outset. This development offers a good opportunity to look at the impacts of solar farms and potentially for proving the worth of good mitigation. We would like to see a commitment to this.	No	Outline monitoring commitments are provided within the **OLEMP [EN0110014/APP/7.4].**
Ecology and Biodiversity	As stated by Natural England, future research should focus on examining the potential of solar PV developments to support biodiversity. The grey literature often refers to mitigation/enhancement practices such as wildflower meadow planting, hedgerow laying and tree planting with some grey literature studies attempting to quantify diversity on solar PV sites. These studies should be formalised and replicated within a scientific framework. In	No	Outline monitoring and biodiversity enhancement commitments are provided within the **OLEMP [EN0110014/APP/7.4].**

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	the case of solar farms, there is almost no evidence and research into their ecological impacts is urgently needed		
Ecology and Biodiversity	**Site 1** This site is adjacent to an area of deciduous woodland (a priority habitat, as defined by Natural England). There would need to be a large buffer zone (we recommend at least 30m) between the area and the woodland habitat and we request that a Construction Environmental Management Plan (CEMP) is drawn up to detail methods of working to ensure that disturbance to the woodland is mitigated. The proposed 30m buffer zones around the woodland should comprise ecotones of shrubs and rough grassland.	Yes	This advice has been considered in the project design approach, within the **Design Approach Document (DAD) [EN0110014/APP/7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made. Embedded buffer zones adopted within the Scheme design are detailed within **ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4].** Protection measures are detailed within the **OEMP [EN0110014/APP/7.1].** All ancient woodlands have been buffered by 30m, however non-ancient woodlands have largely been buffered to a minimum of 15m.
Ecology and Biodiversity	**Site 1** We are aware that this site also falls within one of the key foraging areas for Barbastelle Bats, a highly protected Annex II species and listed as Near Threatened on the global IUCN Red List of Threatened Species. We recommend that you consult the Norfolk Barbastelle Study Group for more detailed information. The scheme is close to a number of known maternity colonies, roost sites and crosses several Core Sustenance Zones (CSZ) for barbastelle bat. It is also possible that other woods in the project area contain roosts or are part of CSZ. Further surveys and information on mitigation in terms of habitat and working practice are needed. The connectivity across the landscape is crucial (this will also benefit other species)	No	**ES Volume 3, Chapter 8. Appendix 8.10 Outline Protected Species Mitigation Strategy [EN0110014/APP/6.3.8.10]** provides species specific mitigation / avoidance approaches. **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** provides an assessment of impacts upon bat species. Norfolk Barbastelle Study Group data has been referred to within **ES Volume 3, Appendix 8.5 Ground Level Tree Assessment Report [EN0110014/APP/6.3.8.5] and ES Volume 3, Appendix 8.6 Bat Activity Survey Report 8.6 [EN0110014/APP/6.3.8.6]** which detail bat survey results and methodology. The assessment concluded likely positive effects through habitat enhancement/creation, buffering existing boundary habitats and increasing habitat suitability to invertebrates within the Order Limits. No operational lighting will also ensure dark corridors within the Order Limits.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Ecology and Biodiversity	**Site 2** This site is adjacent to an area of deciduous woodland (a priority habitat). There would need to be a large buffer zone (we recommend at least 30m) between the area and the woodland habitat and we request that a Construction Environmental Management Plan (CEMP) is drawn up to detail methods of working to ensure that disturbance to the woodland is mitigated. The proposed 30m buffer zones around the woodland should comprise ecotones of shrubs and rough grassland.	Yes	This advice has been considered in the project design approach, within the **DAD [EN0110014/APP/ 7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made. Embedded buffer zones adopted within the Scheme design are detailed within **ES Volume 1, Chapter 4 The Scheme [EN0110014/APP/6.1.4].** Protection measures are detailed within the **Outline CEMP [EN0110014/APP/7.1].** All ancient woodlands have been buffered by 30m, however non-ancient woodlands have largely been buffered to a minimum of 15m. Grassland and scrub habitats have been included within several of these buffered woodland habitats to increase the suitability of woodland boundary habitats for foraging/commuting bats.
Ecology and Biodiversity	**Site 3** This site surrounds Spring Wood CWS, plus an area of deciduous woodland. We previously recommended that this site is dropped from the site selection due to potential impacts on the CWS. We note that the layout has been amended to change the field south of Spring Wood (field 3a) from being under solar panels to being retained as agricultural land and a potential mitigation area. We are not clear exactly what these proposals entail and request clarification on this (Fig. 5.1 sheet 4). While this is an improvement on the previous design, we remain concerned about potential impacts of work in this area, notably the siting of a sub-station in the field immediately west of the ancient woodland. We recommend that the proposed hedgerow reinforcements/new hedge planting is extended to include all boundaries of the solar PV sites in this area rather than the sub-set indicated on Section Map B and that the proposed buffer zones around the woodland	Yes	The field referred to has been withdrawn from the Order Limits, and extensive habitat (buffering) provision of tussocky grassland and scrub has been proposed to the west of Spring Wood within Site 3. Hedgerows planting/infilling has been included along all boundaries of Site 3 where existing intact hedgerows do not already occur. Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	should comprise ecotones of shrubs and rough grassland. An even wider buffer may be required between substation and Spring wood.		
Ecology and Biodiversity	**Site 4** This site surrounds an area of deciduous woodland and is adjacent to another area of this priority habitat. There would need to be a large buffer zone (we recommend at least 30m) between the solar PV area and the woodland habitat and we request that a Construction Environmental Management Plan (CEMP) is drawn up to detail methods of working to ensure that disturbance to the woodland is mitigated. The proposed 30m buffer zones around the woodland should comprise ecotones of shrubs and rough grassland.	Yes	This advice has been considered in the project design approach, within the **DAD [EN0110014/APP/ 7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made. Embedded buffer zones adopted within the Scheme design are detailed within **ES Volume 1 Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**. Protection measures are detailed within the **OCEMP [EN0110014/APP/7.1].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].** All ancient woodlands have been buffered by 30m, however non-ancient woodlands have largely been buffered to a minimum of 15m.
Ecology and Biodiversity	**Site 5** This site surrounds two areas of deciduous woodland priority habitat. There would need to be a large buffer zone (we recommend at least 30m) between the area and the woodland habitat. The proposed 30m buffer zones around the woodland should comprise ecotones of shrubs and rough grassland. We request that a Construction Environmental Management Plan (CEMP) is drawn up to detail methods of working to ensure that disturbance to the woodland is mitigated.	Yes	This advice has been considered in the project design approach, within the **DAD [EN0110014/APP/ 7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made. Embedded buffer zones adopted within the Scheme design are detailed within **ES Volume 1 Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**. Protection measures are detailed within the **OCEMP [EN0110014/APP/7.1].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].** All ancient woodlands have been buffered by 30m, however non-ancient woodlands have largely been buffered to a minimum of 15m.
Ecology and Biodiversity	**Site 7** This area contains a number of sensitive sites and habitats. Site 7c is immediately adjacent to Pope's Wood CWS and D'Oyly's Grove CWS – both ancient woodland, plus is adjacent to other areas of deciduous woodland and ancient woodland. Site 7B is adjacent to Fritton	Yes	This advice has been considered in the project design approach, within the **DAD [EN0110014/APP/ 7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made. Embedded buffer zones adopted within the Scheme design are detailed within **ES Volume 1 Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**. Protection measures are detailed within the **OCEMP [EN0110014/APP/7.1]**. Matters in relation to habitat enhancements

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	Grange Meadows CWS, includes an area of spring-fed lowland Fen irreplaceable habitat and floodplain grazing marsh Priority Habitat. Site 7F is immediately adjacent to Saxlingham Grove CWS and Shotesham-Woodton Hornbeam Woods SSSI. Fylands Road RNR is adjacent to sub-Sites 7I & 7J. 7h is also adjacent to Shotesham-Woodton Hornbeam Woods SSSI. Saxlingham Grove has been identified as a roost site for Barbastelle Bats (table 8.15). There would need to be a large buffer zones (we recommend at least 30m) between the solar PV area and the CWSs/woodland habitat and we request that a Construction Environmental Management Plan (CEMP) is drawn up to detail methods of working to ensure that disturbance is mitigated. The proposed 30m buffer zones around the woodland should comprise ecotones of shrubs and rough grassland. The ES will need to demonstrate that there are no negative impacts on these sites in order to comply with the mitigation hierarchy.		are assessed in the **OLEMP [EN0110014/APP/7.4].** All ancient woodlands have been buffered by 30m, however non-ancient woodlands have largely been buffered to a minimum of 15m. Through avoidance and buffering, no negative impacts are anticipated for these statutory and non-statutory designated sites, as concluded in **ES Volume 1 Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**.
Ecology and Biodiversity	**Site 8** This site is surrounds Ringers Grove ancient woodland on three sides. The site also includes a number of veteran trees and site 8B is close to Shotesham-Woodton Hornbeam Woods SSSI. It is also adjacent to Market Lane RNR. There would need to be a large buffer zone (we recommend at least 30m) between the area and the woodland habitat and we request that a Construction Environmental Management Plan (CEMP) is draw n up to detail methods of working to ensure that disturbance to the woodland is	Yes	This advice has been considered in the project design approach, within the **Design Approach Document [EN0110014/APP/ 7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made. Embedded buffer zones adopted within the Scheme design are detailed within **ES Volume 1 Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**. Protection measures are detailed within the **Outline CEMP [EN0110014/APP/7.1].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.2].** All ancient woodlands have been buffered by 30m, however non-ancient woodlands have largely been buffered to a minimum of 15m. Connectivity between woodlands will be maintained as assessed within Section 8.9 of the **ES Volume 1 Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	mitigated. The proposed 30m buffer zones around the woodland should comprise ecotones of shrubs and rough grassland. We recommend that the ES demonstrates how connectivity between the woodlands will be maintained.		
Ecology and Biodiversity	**Site 9** This site is adjacent to an area of deciduous woodland. There would need to be a large buffer zone (we recommend at least 30m) between the area and the woodland habitat and we request that a Construction Environmental Management Plan (CEMP) is drawn up to detail methods of working to ensure that disturbance to the woodland is mitigated. The site also contains hedgerows listed as priority habitats – these must be retained, and enhanced where possible.	Yes	This advice has been considered in the project design approach, within the **Design Approach Document [EN0110014/APP/ 7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made. Embedded buffer zones adopted within the Scheme design are detailed within **ES Volume 1 Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**. Protection measures are detailed within the **OCEMP [EN0110014/APP/7.1].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].** All ancient woodlands have been buffered by 30m, however non-ancient woodlands have largely been buffered to a minimum of 15m. Priority Hedgerows are to be retained within Site 9. Additionally, newly-created species-rich native hedgerows (and trees) have also been included within the Scheme.
Ecology and Biodiversity	**Site 10** This site includes an area of deciduous woodland. There would need to be a large buffer zone (we recommend at least 30m) between the area and the woodland habitat and we request that a Construction Environmental Management Plan (CEMP) is drawn up to detail methods of working to ensure that disturbance to the woodland is mitigated. The site also contains hedgerows listed as priority habitats – these must be retained, and enhanced where possible.	Yes	This advice has been considered in the project design approach, within the **Design Approach Document [EN0110014/APP/ 7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made. Embedded buffer zones adopted within the Scheme design are detailed within **ES Volume, 1 Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**. Protection measures are detailed within the **OCEMP [EN0110014/APP/7.1].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].** All ancient woodlands have been buffered by 30m, however non-ancient woodlands have largely been buffered to a minimum of 15m. Priority Hedgerows are to be retained with the exception of 30m total of removal for access within Site 10. To mitigate for any loss of hedgerows, newly-created species-rich native hedgerows (and trees) have also been included within the Scheme.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Ecology and Biodiversity	No detailed habitat mapping is provided for the CRC. However, if CRC will cross areas of grassland there is an opportunity to create areas of higher quality species rich grassland after installation is complete. We would be happy to discuss this further and the potential for us to provide delivery of this.	No	There will be no direct control over land located within the CRC following from the temporary short-term impacts associated with the construction process, and all impacted habitats will be reinstated immediately following from works completion. These protection measures are secured within the **OEMP [EN0110014/APP/7.1]** and matters in relation to habitat enhancements are secured in the **OLEMP [EN0110014/APP/7.4],** which is secured by requirement within the **draft DCO [EN0110014/APP/3.1]**.
Ecology and Biodiversity	Generally, the scheme should reduce removal of trees and hedgerows where possible and aim to retain as many hedgerows etc for connectivity between habitats. This is extremely important as it will maintain better connectivity across the landscape with replacement planting where possible in areas where hedgerows are removed for cable installation etc. We also recommend strengthening of retained hedgerow alongside protection of hedgerows during construction. Where hedgerow removal is required, minimise the width of removal and ensure that there is replacement planting after, with aftercare/replacements for failed plants.	Yes	This advice has been considered in the project design approach, within the **Design Approach Document [EN0110014/APP/ 7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made. Designs have sought to retain and enhance hedgerows as much as practicable. Embedded buffer zones adopted within the Scheme design are detailed within **ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**. Protection measures are detailed within the **OCEMP [EN0110014/APP/7.1].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].** Hedgerows are to be retained within the Scheme where possible with only permanent removal required for short 10m sections required for access and where utilising existing farm access is not possible. Where this occurs, newly created species-rich native hedgerows (and trees) have also been included within the Scheme.
Ecology and Biodiversity	**CR1** A Road Side Nature Reserve (RNR) and an area of priority habitat (deciduous woodland) runs adjacent to this area. The ES will need to demonstrate that construction phase embedded mitigation measures and adherence to the CEMP prevents any adverse effects on these habitats.	Yes	Protection measures for both RNRs and deciduous woodland are detailed within the **OCEMP [EN0110014/APP/7.1].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].**
Ecology and Biodiversity	**CR2** A Road Side Nature Reserve (RNR) runs adjacent to this area. The ES will need to	Yes	Protection measures for RNRs are detailed within the **OCEMP [EN0110014/APP/7.1].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	demonstrate that construction phase embedded mitigation measures and adherence to the CEMP prevents any adverse effects on this site.		
Ecology and Biodiversity	**CR4** The cable search corridor passes immediately adjacent to Tyrell's Wood CWS and Wood Green CWS, as well as Pulham Market Bigwood SSSI (Fig 5.1 sheet 4). Tyrell's Wood holds a colony of barbastelle bats so we recommend that this area is avoided as it will impact on the bat's Core Sustenance Zone (CSZ). A CSZ refers to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony using the roost. For Barbastelles, the CSZ extends 6 km. Cabling work could be a significant disruption to bats. We recommend moving the cable route to the west of this corridor. We note that the indicative masterplan fails to map Tyrell's Wood CWS or Wood Green CWS (as marked by the red line in the map below), which are situated immediately adjacent to the proposed CRC. There is also no mention of these 2 CWSs within the PIER, either within the text or as shown on the map of non-statutory designated sites (figure 8.3). This is an important omission and potential impacts on these non-statutory designated sites must be fully assessed.	Yes	This advice has been considered in the project design approach, within the **Design Approach Document [EN0110014/APP/ 7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made. Designs have sought to adopt this advice and amend the CRC route to avoid direct impacts with designated sites. Embedded buffer zones adopted within the Scheme design are detailed within **ES Volume 1 Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**. Protection measures are detailed within the **OCEMP [EN0110014/APP/7.1].** Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4].** **ES Volume 3, Appendix 8.10: Outline Protected Species Mitigation Strategy [EN0110014/APP/6.3.8.10]** provides specific species mitigation / avoidance approaches. **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** provides an assessment of impacts upon bat species. Tyrells Wood and Wood Green CWS are also included within the assessment of the seven adjacent/nearby non-statutory designated sites. A more detailed site-specific assessment is carried out on the six non-statutory designated sites located partially within the Order Limits. **Norfolk Barbastelle Study Group data has been referred to within ES Volume 3, Appendix 8.5 – 8.6 [EN0110014/APP/6.3.8.5 & 8.6]** which detail bat survey results and methodology. As shown, these recommendations were considered and adopted within the Scheme designs, thereby avoiding significant impacts
Ecology and Biodiversity	**CR5** This area is adjacent to an area of priority habitat. The ES will need to demonstrate that construction phase embedded mitigation	Yes	This advice has been considered in the project design approach, within the **Design Approach Document [EN0110014/APP/ 7.17]** which explains how the design principles developed for the Scheme have influenced the design of the Scheme and have been a key consideration in decisions that have been made.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	measures and adherence to the CEMP prevents any adverse effects on this habitat.		Embedded buffer zones to woodland (priority Wood Pasture and Parkland in this case) adopted within the Scheme design are detailed within **ES Volume 1 Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**. Protection measures are detailed within the **OCEMP [EN0110014/APP/7.1].**
Ecology and Biodiversity	**CR6** This area includes a number of veteran trees and The Hempnall Beck (tributary of the River Tas), a chalk stream. The ES will need to demonstrate that construction phase embedded mitigation measures and adherence to the CEMP prevents any adverse effects on these habitats.	Yes	Temporary CRC works have avoided features such as watercourses through Horizontal Directional Drilling (HDD). All veteran trees will be buffered with root protection areas and avoided as detailed in **ES Vol 3, Appendix 7.10: Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10]** Further information regarding species-specific safeguards is provided within **the Outline Protected Species Mitigation Strategy [EN0110014/APP/8.10].** Embedded avoidance and mitigation measures associated with the HDD operations are provided within the **OCEMP [EN0110014/APP/7.2]** and the **Outline Cable Route Construction Statement [EN0110014/APP /7.21].**
Ground Conditions	**Cr7** This area includes within it Fritton Grange Meadows CWS, an area of spring-fed lowland fen irreplaceable habitat and The Hempnall Beck, a chalk stream and a tributary of the River Tas (Fig 5.1 sheet 5). It is also adjacent to The Krons Meadows CWS. Cabling could damage the hydrology of the fen habitat so a hydrological impact report would be needed to assess this. This area also includes areas of peat soil. Disturbance of peat soils will result in release of carbon sinks. It is stated that HDD will be used for the cable route in this area and that this will be under the depth of the peat layer to avoid disturbance to the peat soils. The ES will need to demonstrate that there are no impacts on the sites and habitats or on the peat soils in order to comply with the mitigation hierarchy.	Yes	Ground investigation will be undertaken post-consent to inform the detailed design of the Scheme. This includes the design of the HDD. Peat deposits are recorded by the BGS only within CRC7, adjacent to the Hempnall Beck, within a County Wildlife Site that is also a designated area of irreplaceable fenland habitat. Whilst the ecological constraints in this area alone would prevent the use of shallow trenching, the practical considerations of CRC7 mean that a trenchless crossing, beneath the peat deposits (if present) will in any event be considered to be used in this area. The design of the Scheme will therefore provide mitigation against damage to peat deposits. Temporary CRC works have avoided features such as watercourses/lowland fen within CRC7 through HDD. Further information regarding species-specific safeguards is provided **within the Outline Protected Species Mitigation Strategy [EN0110014/APP/8.10].** Embedded avoidance and mitigation measures associated with the HDD operations are provided within the **OCEMP [EN0110014/APP /7.2]** and the **Outline Cable Route Construction Statement [EN0110014/APP /7.21].**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Ecology and Biodiversity	**CR8** This site surrounds Beckett's Wood CWS and includes a number of veteran trees and areas of deciduous woodland priority habitat. It surrounds Shotesham-Woodton Hornbeam Woods SSSI and is also adjacent to Fylands Road RNR. The ES will need to demonstrate that construction phase embedded mitigation measures and adherence to the OEMP prevents any adverse effects on these habitats.	Yes	The Applicant can confirm that veteran trees and areas of deciduous woodland priority habitat have been considered and included in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]**, alongside relevant mitigation, including the provision of a 15m offset from all trees and woodland, as secured through the **OLEMP [EN0110014/APP/7.4].** In accordance with the **Design Principles, Parameters, and Commitments [EN0110014/APP/7.18]** generally tree removals within the Order Limits have been avoided wherever possible. However, to facilitate construction and implementation of the Scheme select and targeted tree removals are identified within **ES Volume 2, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10]**. Existing trees and woodland will be reassessed prior to construction, and this will help inform the measures in the **OLEMP [EN0110014/APP/7.4]**, secured by Requirement 7 of the **draft DCO [EN0110014/APP/3.1].** During the operational phase, as detailed in and secured through the **OOEMP [EN0110014/ APP/7.2]**, all maintenance and replacement activities near veteran trees will be supervised by an Arboricultural Clerk of Works (ACoW) to ensure no machinery or materials enter the Veteran tree buffer zone. This may be achieved through implementation of ground protection and/or tree protection fencing around the veteran tree buffer zones during maintenance and replacement activities.
Ecology and Biodiversity	**CR9** This site is partially within Lower Spring Wood CWS and is adjacent to Spring Wood CWS. 8.7.41 states that in order to avoid direct impacts upon the CWS, HDD will be utilised, resulting in short-term minor disturbance effects outside of the CWS boundaries, and potential short-term minor vibration disturbance effects associated with the HDD drilling process. The ES will need to demonstrate that construction phase	Yes	As detailed in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8], t**he construction phase operations will adhere to a 15m buffer zone surrounding both of these Lower Spring Wood CWS and Spring Wood CWS, thereby avoiding direct habitat loss. This mitigation measure is secured within the **OCEMP [EN0110014/APP/7.1]**. Dust mitigation measures have been adopted within the **CEMP [EN0110014/APP/7.1]** and will be adopted throughout the construction period, thereby, avoiding significant dust related impacts upon these sites.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	embedded mitigation measures and adherence to the CEMP and HDD precautionary methodologies prevents any adverse effects on the CWS or on protected species such as bats.		Further information on dust avoidance measures is provided within **ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [EN01100 14/APP/6.3.13.1]**.
Ecology and Biodiversity	**CR11** This area is adjacent to Pope's Wood CWS. The ES will need to demonstrate that construction phase embedded mitigation measures and adherence to the CEMP prevents any adverse effects on these habitats.	Yes	This is addressed within the **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** and further detailed in the **OCEMP [EN0110014/APP/7.1].** A minimum 30m buffer zone will be implemented to protect nearby and adjacent CWS.
Ecology and Biodiversity	**CR13** The cable search corridor passes adjacent to Nunn's Grove CWS between site 8 and 9. The ES will need to demonstrate that construction phase embedded mitigation measures and adherence to the CEMP prevents any adverse effects on these habitats.	Yes	This is addressed within the **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** and further detailed in the **OCEMP [EN0110014/APP/7.1].** A minimum 30m buffer zone will be implemented to protect nearby and adjacent CWS.
Ecology and Biodiversity	The development should avoid harm to designated sites of local, national, and international importance or negative impacts protected species. Underground cables have the potential to adversely impact upon biodiversity during construction so cable routes need to be carefully designed to avoid detrimental impacts on wildlife.	Yes	The Applicant's **Design Principles, Parameters [EN0110014/APP/7.18]** and Commitments document outlines measures to avoid harm to designated sites of local, national and international species. This includes a 30m buffer from SSSIs, CWS and Ancient Woodland, and 10m buffer from hedgerow. A 15m buffer will be applied to individual trees, groups of trees and non-Ancient Woodland. The Applicant has prepared an **Outline Protected Species Mitigation Strategy** (available in **ES Volume 3, Appendix 8.10 [EN0110014/APP/8.3.8.10]**). The design of the Cable Route Corridor (CRC) has been informed by the presence of protected and notable species and habitats and the potential for disturbance. A series of Avoidance Areas and their associated environmental receptor is set out in Table 2.1 and Appendix A of the **Outline Cable Route Construction Statement [EN0110014/APP/7.21].** A final Crossing Schedule of key infrastructure and environmental features will be provided for each stage of

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			construction and secured via **the OCEMP [EN0110014/APP/7.1]** as per the **draft DCO [EN0110014/APP/3.1]** and concluded no likely significant effects**.**
Ecology and Biodiversity	Where removal of hedgerows is required to lay the cable, we recommend that HDD is used if the hedgerow is an ancient hedgerow . Where hedgerow removal is required, proposed mitigation should include improving the standard and design of hedgerow mitigation work, to include using species of local provenance, double planting and a long-term management plan.	Yes	Within the CRC, hedgerow removal will see a maximum of 10m of hedgerow removal from any section of hedge. These will be temporary removals and replanted with up to eight native species of local provenance. For areas within the Sites where permanent hedgerow removal is required, this will be limited to 10m sections to allow for permanent access across the Sites. Where possible, existing field access points will be used. To mitigate for the loss of hedgerow sections, species-rich native hedgerow (and trees in some cases) will be planted across the Sites with up to 11 species (including tree species) will be included and managed to Moderate condition. More details on the mitigation measures set out above are included within the **OLEMP [EN0110014/APP/7.4].**
Ecology and Biodiversity	We highlight the following recommendations for working practices that will be required: • Keep all cabling work away from the woods, especially those with bat maternity colonies. • Noise and vibration are a risk to maternity colonies – avoid working near woods during the maternity period of mid-June to end of July. This should include both the construction period, any large scale maintenance works and the ultimate removal of the panels. • Minimise disturbance to hedges • No operational or construction site lighting in core areas and especially near woodlands.	Yes	Regarding bats, an extensive impact assessment has been undertaken which identified 11 species active within the Order Limits, with records of at least five species breeding (via EPSML license returns). Due to the presence of nationally important bat assemblages, the Scheme's design process has sought to embed avoidance and protection measures for roosting bat species and their associated habitats, in order to reduce impacts and disturbance to bat species within and adjacent to the Order Limits throughout the construction phase. The Scheme design has sought to retain the large majority of existing hedgerow systems throughout the Order Limits. Also, the implementation of extensive 10m buffer zones surrounding field boundary hedgerows (extending to a minimum of 15m surrounding hedgerow trees and woodland) which will conserve field margin habitats and potentially breeding and roosting habitats. Where possible, work access tracks will utilise existing farm access gaps within field boundaries and only when unavoidable a maximum of 10m in a single hedgerow will be removed for access. Ecological buffers applied to the design of the Scheme are provided within the **Design Principles, Parameters and Commitments [EN011014/APP/7.18]** and retained habitat protection measures are committed to via the **OCEMP [EN0110014/APP /7.12]**.
Water Environment	A robust assessment of the impacts of the cable route on hydrology, where indirect impacts have the potential to interfere with	No	As detailed in **ES Volume 3, Appendix 9.2 - Water Framework Directive Assessment [EN0110014/APP/6.3.9.2],** where required, CRC river crossings will be trenchless, for example using horizontal directional drilling techniques (HDD).

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	ground water flows and local hydrology, is required		This will require a launch/reception pit to be excavated at the starting point and end point, respectively, which will be approximately 8m in length, 4m wide, and 2m deep. These will maintain a buffer of at least 10m from all watercourses. An **Outline Cable Route Construction Statement [EN0110014/APP/7.21]** has been submitted with the DCO Application providing further information with respect to watercourse crossings and associated Avoidance Areas.
Community Benefits	Working with the local community is key in delivering a successful project. We suggest the following as potential community benefits • Claylands is a focal area of NWT, with particular focus on hedges, woods, meadows and ponds. Our aim is to create a more connected landscape for nature. Key species include barbastelles, hedgehogs, great-crested newts, farmland birds and suite of localised meadow flora. We strongly support the inclusion of on-site green infrastructure, such as the provision of new green spaces, hedgerow for screening, grassland creation etc, as well as the provision of other wildlife habitats such as bat and bird boxes. • Funding wildlife corridors to link existing areas of habitats and allow wildlife and people to move across the landscape – a sunshine walk with interpretation along the way. This would be a strategic green infrastructure benefit. We recommend working with South Norfolk Council alongside ourselves and any other relevant organisations, as this would incorporate land outside the red line boundary to ensure that opportunities to enhance nature connection f or local communities is not just mitigated but enhanced. This might include better path networks, including new circular walks, new path connections, new ponds	No	The Applicant is committed to working with local interest groups, local parish councils, and South Norfolk Council and Norfolk County Council on the Scheme's Community Benefit Fund. The Scheme is anticipated to benefit local people through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows, planting of new tees, providing biodiversity net gain through habitat improvements. Although a community benefits package is an element of post-consent work that the Applicant intends to work closely with the local community on the **Outline Employment, Skills, and Supply Chain Strategy (OESSCS) [EN0110014/APP/7.9]** details, a key goal is to generate significant employment growth, particularly in high-value sectors, while ensuring accessible jobs across urban and rural areas. The GNLP also focuses on developing a highly skilled workforce through strong partnerships with local universities and colleges, fostering research expertise and innovation. Community benefit suggestions by the respondent including community meadows, wildlife corridor funding have been noted by the Applicant and will be considered as the evolving plans for a community benefits package progress. As detailed in **Biodiversity Net Gain Report [EN0110014/APP/7.23]** the Applicant expects a net gain of at least 10% across the Scheme areas including: • 37.42% gain for habitats • 31.35% gain for hedgerows • 16.08% for watercourses.

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	and/or woodlands • Funding the NWT Wilder Learning programme for the Claylands –we can provide more details on this if required. • Funding research into priority species or habitats in the area – this might involve partnerships with universities, study groups, eNGOs etc (ie Norfolk and Norwich Bat Group) • Funding a citizen science programme to monitor new nature recovery initiatives • Funding a community meadows programme where donor meadows are created to provide green hay to new meadow creation sites • In addition, we strongly recommend that there is a wider community financial benefit beyond just a modest benefit fund, which would see those who experience the greatest amenity impacts, experiencing direct financial benefits such as discounted bills. • Potential to work with other groups such as the Norfolk Ponds Project		
Ecology and Biodiversity	The ES will need to demonstrate that there are no adverse impacts on bats and other protected species. We recommend that operational and construction phase impacts on connectivity between roosts and foraging areas is carefully considered. We recommend that a robust assessment of the indirect impacts of the route on the wider landscape should also be carried out to include impacts on habitat connectivity, bats and farmland birds, in particular any populations of turtle dove, a species at risk of being lost from the UK, but which still occurs in south Norfolk.	Yes	Regarding bats, an extensive impact assessment has been undertaken which identified 11 species within the Order Limits. Due to the presence of nationally important bat assemblages, the Scheme's design process has sought to embed avoidance and protection measures for foraging/commuting bat species, in order to enable bat species to continue to utilise habitats within the Order Limits throughout the construction phase. The Scheme design has sought to retain the large majority of existing hedgerow systems throughout the Order Limits. Also, the implementation of extensive 10m buffer zones surrounding field boundary hedgerows and ditches (extending to a minimum of 15m surrounding hedgerow trees and woodland) which will conserve field margin habitats which constitute key movement corridors along which foraging and commuting bats traverse the Order Limits. Ecological buffers applied to the design of the Scheme are provided within the **Design Principles, Parameters and Commitments [EN011014/APP/7.18]** and retained habitat protection measures are committed to via the **OCEMP [EN0110014/APP /7.12]**.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			Regarding turtle doves, as detailed in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8],** multiple records of the species were returned from across the search area. All breeding birds and their nests are protected under the W&CA, with species listed under Schedule 1 of the Act receiving increased levels of legal protection (during breeding periods). Potential direct impacts upon nesting birds during the construction phase are limited to terrestrial habitat loss associated with clearance of small sections of hedgerows or other field boundary habitats required for access or cable trenching. Impacts associated with this have been reduced by specifically designing routes to utilise existing field entrances and gaps in hedgerows and other linear habitats wherever practicable. Where access is required through linear features such as field margins and hedgerows, these construction impact areas will be reduced to a maximum of 10m working width. These field boundary habitat losses constitute a very small proportion of the overall habitat network, and as such there will be no significant loss of habitat for nesting birds. Nesting birds, including turtle doves, will benefit from mitigation measures outlined in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8] and the OCEMP [EN0110014/APP/7.1],** including the retention of hedgerows as far as practicable, new landscape planting, and habitat protection buffers which will be maintained throughout the construction phase and identified with appropriate exclusion fencing, along with Site team briefings at 'toolbox talks'. The **OCEMP [EN0110014/APP/7.1]** further details and secures measures and approaches to be adopted which will limit the likelihood of impacts upon nesting birds.
Ecology and Biodiversity	A full assessment of the potential impacts of the CRC is required and it is stated that this will be provided within the ES (para 8.3.15). This must include an assessment of disturbance of peat soils and disturbance of the hydrology of spring-fed fens. The assessment must also include the operational ecological effects of EMFs generated by underground cables buried beneath important	Yes	The Applicant can confirm that a full assessment of the potential impacts arising from the CRC has been undertaken, including consideration of peat soils and hydrological disturbance of spring-fed fens. As detailed in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**, cables will be buried beneath the peat layer that forms the lowland fen, this will be fluid-free to reduce the risk of leaching of pollutants to the surrounding hydrogeological environment and will be left in situ during the operational phase. The thermal dynamics of the cables are limited to their

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	habitats and upon receptive wildlife species potentially utilising the Hempnall Beck and demonstrate that there are no adverse impacts. Para 8.7.49 states that HDD will be utilised for the entire width of the CWS between sub-Site 7B and open farmland to the south of the CWS, stating that this will result in minor short-term disturbance and vibration impacts. We note that there are peat soils in this area which should not be disturbed so cables must be buried underneath the peat layer		immediate proximity and therefore will not significantly affect the thermal dynamics in the lowland fen. This will result in no likely significant effects. This is secured in the **OCEMP [EN0110014/APP/7.1]**
Ecology and Biodiversity	As noted in our comments relating to CR4, there is no assessment of impacts on Tyrell's Wood CWS or Wood Green CWS. These are not included in table 8.12. and is a serious omission from the assessment as they are adjacent to the CRC.	Yes	Whilst not specifically assessed as standalone CWS, Fritton Grange Meadows & Lower Spring Wood CWSs are located within CRC7, and four Roadside Nature Reserves are located within CRC4. These are assessed by name, but it is noted that a further seven non-statutory designated sites are located immediately adjacent to the Order Limits (including Tyrell's Wood and Wood Green CWSs). The assessment of the CWSs within the Site are considered to provide sufficient assessment and subsequent avoidance measures to be considered applicable to the adjacent CWSs. Additionally, the additional 34 CWSs located within 2km of the Order Limits are also assessed in the subsequent section of the **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**,
Ecology and Biodiversity	Section 8.5.5 (PIER) details potential operational impacts of the solar farm. There is some evidence that aquatic insects, bats, and birds may mistake large solar arrays as water bodies, causing them to attempt to breed on them, drink from them or land on them. This potential impact should be considered for any solar farm development close to protected sites which are designated for their importance for these species. Further monitoring of solar farms is required to confirm or disprove this potential impact to wildlife from solar development.	Yes	Potential impacts on ecological receptors have been assessed in the **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]** and post construction monitoring of the operational development is committed to within the **OLEMP [EN0110014/APP/7.4].** Exclusion buffer zones have also been implemented for surrounding watercourses and bodies.

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Ecology and Biodiversity	The River Tas is located within the Application Site boundary (para 3.15.20). This is a chalk stream priority habitat with a current ecological status of Poor. The effects of the Scheme on the River Tas must be fully considered within the ES and it must be demonstrated that there are no adverse impacts.	Yes	The impacts of the Scheme on the River Tas are considered within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]** and post construction monitoring of the operational development is committed to within the **OLEMP [EN0110014/APP/7.4].** The River Tas passes through the Order Limits across CRC7 whereby construction works are planned to be temporary and HDD will be used to avoid any direct impacts on the chalk stream. Exclusion buffer zones of works are also implemented surrounding associated watercourses.
Ecology and Biodiversity	We welcome the mitigation and enhancement measures outlined in 5.2.74 – 80. Paragraph 5.2.76 states that these measures 'will be considered'. We strongly recommend that they are adopted and are incorporated in to a CEMP/LEMP.	No	This is welcomed by the Applicant. Further details can be found in **OCEMP [EN0110014/7.1]** and **OLEMP [EN0110014/APP/7.4]**.
Ecology and Biodiversity	Table 5.1 sets out the minimum offsets/buffer distances. It specifies a 30m buffer for non-statutory sites on a 'case by case' basis – we query what this means and recommend that all designated site (statutory and non-statutory) have this buffer. We note that there is no proposed buffering around Priority Habitats and strongly recommend that buffers around these areas of important habitat are added to the scheme design. We welcome the statement that the Scheme design has adopted minimum 30m 'buffer zones' in relation to the protection of SSSI woodland habitats (8.7.16), non-statutory sites (para 8.7.63) and Hempnall Beck (para 8.7.81). It is stated that a 15m around irreplaceable habitats will be adopted – we recommend that this is increased to 30m.	Yes	A commitment has been made to provide 30m buffer for all County Wildlife Sites within the Order Limits or immediately adjacent to the Order Limits as detailed in Table 4.1 of the **Design Principles, Parameters and Commitments [EN011014/APP/7.18].** Irreplaceable habitats (ancient woodland and lowland fen) will be buffered by 30m. Veteran/Ancient trees will be buffered to 15x the width of the stem diameter or 5m from the edge of the trees canopy, whichever is greater. Non-ancient woodland will be buffered by 15m and hedgerows by 10m.
Construction and Decommissioning	We recommend that the CEMP should include detail on: - Descriptions and mapping of all exclusion	Yes	An **OCEMP [EN0110014/APP/7.1]** has been prepared to support the **draft DCO [EN0110014/APP/3.1**].

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	zones (both vehicular and for storage of materials) to be enforced during construction to avoid any degradation or soil compaction on areas where habitat is to be retained, created or enhanced. - Construction Programme: A schedule outlining the key phases of construction, including site preparation, component installation, and grid connection, to ensure sensitive periods are avoided (this will vary for different taxa). - Vehicle Access and Traffic Management: Plans for managing construction traffic, including routes, access points, and parking. - Working Hours: Defined working hours to minimize noise and disturbance to nearby residents. - Noise and Vibration Management: Measures to control noise and vibration levels during construction, such as using quieter equipment and implementing noise barriers. - Dust and Air Quality Management: Strategies to control dust emissions, including water suppression, covering stockpiles, and using dust screens. - Soil Management: Procedures for topsoil stripping, storage, and reinstatement to minimize soil erosion and compaction. - Water Management: Measures to manage surface water runoff, prevent watercourse pollution, and protect groundwater resources. - Waste Management: Procedures for waste segregation, storage, recycling, and disposal, including a Site Waste Management Plan. - Contamination Prevention: Measures to prevent contamination of land and water		The **OCEMP [EN0110014/APP/7.1]** describes the framework of mitigation measures to be followed and to be carried forward to a detailed CEMP prior to construction. The **OCEMP [EN0110014/APP/7.1]** will be used as the basis for the contractor to prepare a detailed CEMP prior to construction and following the detailed design of the Scheme. The detailed CEMP would be approved by Norfolk County Council following the grant of the DCO prior to the start of construction. It would identify the procedures to be adhered to and managed by the contractor throughout construction and would clearly define roles and responsibilities. Within this, the **OCEMP [EN0110014/APP/7.1]** commits to production of a Site Waste Management Plan (SWMP) before construction begins. Production of the detailed CEMP is secured through a requirement in Schedule 2 of the **draft DCO [EN0110013/APP/3.1]**. The **OCEMP [EN0110014/APP/7.1]** includes measures relating to materials storage and handling, the construction programme, and construction working hours. Construction traffic management is addressed separately within the **OCTMP [EN0110014/APP/7.6]**. The **OCEMP [EN0110014/APP/7.1]** also sets out measures for dust and air quality control, soil management (with detailed provisions contained within the **Outline Soil Resources Management Plan (OSRMP) [EN0110014/APP/7.9]**), water management, and waste management. In addition, it includes measures to prevent contamination and to protect both flora and fauna during construction. We would welcome comments from NWT on the **OCEMP [EN0110014/APP/7.1]** and other relevant management documents.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	resources from hazardous materials. - Biodiversity Protection: Measures to minimize impacts on flora and fauna, including habitat protection, translocation, and wildlife monitoring. - Lighting Management: Strategies for minimizing light pollution from construction activities and the operational solar farm, eg any lighting to be directed away from habitats and designed in accordance with BCT/lighting Institute guidance –downlighting etc. - A detailed to show hedgerow removal		
Ecology and Biodiversity	Table 8.17 provides information around commuting and foraging bats. It is stated that existing linear features (hedgerows, grassland field margins, ditch networks, river corridors and lines of trees) that pass through the arable landscape are of moderate suitability and that key areas within the Site such as the riparian habitats of the Hempnall Beck (CRC7 and CRC8) and the grazing pasture bordering off-site farmland may potentially support High suitability. We note that we are aware of other key areas of importance and we recommend that detailed bat surveys, including radiotracking studies, are undertaken to establish commuting and foraging areas in order that appropriate mitigation can be put in place. We suggest working with the Norfolk Barbastelle Bat Group as they have a detailed knowledge of the area.	Yes	Information was purchased from the Norfolk Barbastelle Bat Group and supplemented the data collected from field surveys (activity surveys and ground level tree surveys). A full assessment of bat commuting and foraging was carried out in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]** concluding the potential for locally significant positive effects. Feld surveys and desk study records (including those supplied by the Norfolk Barbastelle Group) were presented in the **ES Volume 3, Bat Activity Survey Report [EN0110014/APP/6.3.8.6]**.
Ecology and Biodiversity	We advise that bat surveys are carried out as per the guidance in all habitats of 'moderate suitability' and that they include assessment of any buildings or trees to be removed as well as	Yes	Daytime ground-based assessment of all trees within the Order Limits for potential to support roosting bats was conducted as part of the **ES Volume 3, Appendix 8.5 - Ground Level Tree Assessment Report [EN0110014/APP/6.3.8.5]** and further surveys in relation to Bat activity can be found in **ES Volume 3, Appendix 8.6 - Bat Activity Survey**

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	their suitability for roosting and/hibernating bats and further survey requirement.		**[EN0110014/APP/6.3.8.6**]. No buildings were identified for removal, and no trees with bat roost potential were identified for removal.
Ecology and Biodiversity	Table 8.4 states that operational impacts on breeding birds have been scoped out of the assessment. We reiterate our previous comments that protected and/or Priority species recorded on site which are not likely to be accommodated within the footprint of the solar farm, such as skylark and lapwing, must be considered in a separate mitigation strategy if found to be present on site.	Yes	**A Breeding Bird Survey Report [EN0110014/APP/6.3.8.4]** provides details of the Applicant's findings in relation to Skylark and Lapwing. No lapwings were found to be breeding within the Sites and skylarks have had a Skylark Mitigation Strategy carried out, as detailed in the **Outline Protected Species Mitigation Strategy** (available in **ES Volume 3, Appendix 8.10 [EN0110014/APP/8.3.8.10]**) to ensure no likely significant effects.
Ecology and Biodiversity	Impacts should be assessed for the operational phase so the appropriate mitigation can be applied, and monitored after construction. It is concerning that breeding birds have been scoped out – if hedgerow and tree removal, scrub vegetation etc is required impacts need to be assessed and mitigated for appropriately.	No	Impacts upon important ecological receptors at the operational stage have been included in line with the scoping responses received by PINS. An assessment of ecological impacts is provided within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8].** Mitigation measures are included in the **OLEMP [EN011014/APP/7.4]** through the which is secured by requirement within the **draft DCO [EN0110014/APP/3.1]**.
Ecology and Biodiversity	We welcome the commitment that delivery of a quantifiable BNG will be considered as an inherent part of the Scheme (para 8.3.19). In the context of BNG assessments for solar farms, we recommend that areas covered by the solar panels and associated infrastructure are treated as modified grassland of poor quality as this habitat usually has a low biodiversity value. This effectively means that solar farms need to compensate for the lower of biodiversity associated with the area under panels by creating or enhancing habitats elsewhere on or off-site. There are no details of BNG at present and we seek clarification of how will this will be delivered (ie On-site or off site)? We are aware that the current system of	No	The DCO submission includes the provision of the **Biodiversity Net Gain Report [EN0110014/APP/7.23]** and the Scheme's **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24].** Matters in relation to habitat enhancements are secured in the **Outline Landscape and Ecology Management Plan [EN0110014/APP/7.4].** Modified grassland within the solar array footprint will be managed with the intention to aim for moderate condition, however within the metrics, it is assumed that poor condition modified grassland is to be created. A minimum 20% BNG score has been achieved for Habitats and Hedgerows and a minimum 15% BNG score has been achieved for watercourses.

EIA Topic	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	mandatory BNG is under consultation. We ask that there is a commitment to the provision of at least 20% BNG whatever the outcome of the consultation.		
Ecology and Biodiversity	We note that para 8.6.4 states that the ES chapter and associated OLEMP will provide further information regarding the proposed long-term management of the land for the duration of the Scheme to conserve and improve landscape habitat connectivity with the wider landscape for wildlife through protecting and enhancing potentially-important wildlife corridors and habitats within the Site boundaries. We welcome this intention and look forward to seeing the details of this.	Yes	These matters are indeed assessed in the **ES Volume 1, Chapter 8 – Ecology and Biodiversity EN0110014/APP/6.1.8]** and mitigation measures are secured in the **Outline Landscape and Ecology Management Plan [EN0110014/APP/7.4]**.
Scheme Description	Due to the spread out layout of this scheme the cost per MW generated will be higher than for a compact scheme, making it less efficient. We have concerns that this could create an incentive for the developer to bring further sites forward to utilise the cable route corridors in future if this scheme is approved. Are there any guarantees that this will not occur?	No	The Applicant acknowledges this response and confirms that the application design is as accurate as possible, whilst maintaining some required flexibility for detailed design. If the Development Consent Order (DCO) is made, Solar PV Panels would only be authorised in the areas proposed for them in the **Works Plan [EN0110014/APP/2.3]**. The land rights necessary for implementation of the Scheme only apply to land within the Order Limits, and this includes cable route corridor areas.

1.24 Wacton Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Landscape and Visual	We do not wish to see our area blighted by this application and the danger it will provide to parishioners, local economy and local wildlife which is our main concern along with the procedural issues detailed in the main document.	No	Concerns raised in this submission have been noted by the Applicant. Impacts on the local economy have been assessed **in ES Volume 1, Chapter 14: Socio-Economics [EN0110014/APP/6.1.14]**. During the construction and operational phase, the Applicant will implement employment and skills measures designed to maximise local benefit from the Scheme. These will include the creation of apprenticeships and trainee opportunities. This is detailed further in the **Outline Employment, Skills and Supply Chain Strategy (OESSCS) [EN0110014/APP/7.10]**. Effects on wildlife have been assessed in detail in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]**, and ecological measures such as wildlife enhancement features, Skylark mitigation, Ghost Pond restoration and community accessible spaces are detailed in **the Outline Landscape and Ecology Management Plan (OLEMP) [EN0110014/APP/7.4]**, a detailed version of the management plan wo;; be created prior to the implementation of the Scheme and is secured via a Requirement within the **draft DCO [EN0110014/APP/3.1]**.

1.25 Forestry Commission

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Landscape and Visual	We note there are nine Ancient Woodlands adjacent to the site boundary, including Ancient	No	The Applicant notes this comment.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	Semi Natural Woodland and Plantations on Ancient Woodland sites. Also, there are numerous ancient and veteran trees within the site and the cable route area.		
Landscape and Visual	Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Section 5.4.53 of EN1 – The Overarching National Policy Statement for Energy states: *"The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists."*	No	The Applicant notes this comment. ES Volume 3, Appendix 7.10 Preliminary Arboriculture Impact Assessment (AIA) [EN0110014/APP/6.3.7.10] identifies the existing tree resource within and adjacent to the Order Limits. This includes the identification of important features i.e. Veteran and/Ancient Trees. No Veteran Trees or Ancient Woodland are proposed to be removed as part of the Scheme. **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]** details specific offsets/buffers from existing landscape features, include Ancient Woodland and Veteran Trees, embedded into the design. Habitat creations are proposed within the buffer zone as per NE's standing advice. This is detailed within the **Outline Landscape and Ecology Management Plan (OLEMP) [EN0110014/7.4]**, a detailed version of which will be secured via a Requirement of the DCO.
Ecology and Biodiversity	We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England. The Standing Advice states that proposals should have a buffer zone of at least 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're	Yes	**ES Volume 3, Appendix 7.10 Preliminary AIA [EN0110014/APP/6,3.7.10]** identifies the existing ancient woodland adjacent to the Order Limits. No Ancient Woodland is proposed to be removed as part of the Scheme. **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]** details specific offsets/buffers from Ancient Woodland embedded into the design; this has been increased to a minimum of 30m. Habitat creations are proposed within the buffer zone as per NE's standing advice. This is detailed within the **OLEMP [EN0110014/7.4]**, a detailed version of which will be secured via a Requirement of the DCO.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction. The Standing Advice and the recommended buffer zones are currently under review and are likely to be updated recommending that the minimum buffer requirement will be increased.		Pollution prevention measures are detailed within the **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]**. Further information on dust avoidance measures is provided within **ES Volume 3, Appendix 13.1 Construction and Decommissioning Dust Risk Assessment [EN0110014/APP/6.3.13.1]**.
Ecology and Biodiversity	We note that buffer zones are planned for the ancient woodlands, although there appears to be a difference in the size of the buffer zone planned for ancient woodland or for ancient woodland that is also a SSSI. There is no difference in the value of an ancient woodland whether it is registered as a SSSI or not, therefore considering the scale of the proposed development and the number of woodlands affected, we would have expected to see a larger than minimum buffer zone for every ancient woodland affected. With only a minimum 15m buffer afforded to the Ancient Woodland, in our view there is reasonable doubt that deterioration of the ancient woodlands could still occur as a result of the proposed development. Where possible, buffer zones should contribute to wider ecological networks and be part of the green infrastructure of the area. They should consist of semi-natural habitats such as including woodland, scrub, heathland and wetland.	Yes	**ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]** details specific offsets/buffers from Ancient Woodland embedded into the design, with all ancient woodland buffers having been increased to a minimum of 30m. Habitat creation/enhancement measures are proposed within the buffer zone as per NE's standing advice. This is detailed within the **OLEMP [EN0110014/7.4]**, a detailed version of which will be secured via a Requirement of the DCO.
Landscape and Visual	We note Construction Environment Management plans will be produced including pollution and dust prevention measures and a lighting strategy.	Yes	An **OCEMP [EN0110014/APP/7.1]** and an **Outline Lighting Strategy [EN0110014/APP/7.26]** has been produced as part of the DCO Application.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Soils and Agriculture	It is essential that fuels, chemicals or materials such as topsoil, minerals or hardcore are not stored on Ancient woodland soils or underneath the canopy.	Yes	As detailed in **Outline Soil Resource and Management Plan (ORMP) [EN0110014/APP/7.9]** Topsoil stripping would be required from areas proposed for Access Tracks, Construction Compound locations, the BESS, Conversion Units, the Project Substations and National Grid Substation. There is a potential requirement for localised site levelling, which would also involve stripping of topsoil prior to regrading. This disturbance to the topsoil would be temporary, mostly long-term, spanning the lifespan of the Scheme. The detailed SMP will also describe where and for how long these soils would be stockpiled.
Ecology and Biodiversity	Ancient and veteran trees are also irreplaceable habitats. The Joint NE/FC Standing Advice states that for or ancient or veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals).	Yes	Offsets have been applied in accordance with Natural England and Forestry Commission Standing Advice. The Root Protection Zones (RPZ) of veteran trees are excluded from all forms of development within the Scheme, including solar PV arrays, fencing, and maintenance tracks. Minimum Offsets/Buffers from Existing Features is shown in **ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**.
Ecology and Biodiversity	We note assessment implies that impacts on the Ancient woodlands and veteran trees would only be a short term impact. Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable	Yes	**ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]** presents the significance of effects on Ancient Woodland and veteran trees. During construction, no direct effects on Ancient Woodland are anticipated, and the resulting magnitude of impacts is negligible, resulting in a Negligible effect which is not significant.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	damage. The RPA should be avoided and protected, especially in the cases where there is likely to be frequent construction traffic where roots are particularly vulnerable to compaction.		Given that embedded mitigation measures will be incorporated into the Scheme to avoid impacts on surrounding ancient woodland parcels during the operational phase, no direct effects are anticipated, and the resulting magnitude off impacts is negligible, resulting in a Negligible effect which is not significant. No additional construction phase mitigation measures are required, and no residual effects are anticipated. No veteran trees/ancient trees will be removed to facilitate the construction of the Scheme or temporary access requirements. The **OCEMP [EN0110014/APP/7.1]** includes embedded mitigation requirements to be implemented to avoid any impacts upon such trees. Ancient or veteran tree Root Protection Areas (RPAs) or buffers will be avoided, and construction techniques will be used to avoid impacts to RPA where the cable route intersects the RPA. The buffer zones of the ancient and veteran within the Order Limits will be avoided in accordance with the Design Principles which would ensure that retained veteran trees are not adversely affected during the construction process. Further information is provided within **ES Volume 3, Appendix 7.10 Preliminary AIA [EN0110014/APP/6.3.7.10]**. The **OOEMP [EN0110014/APP/7.2]** includes embedded mitigation requirements to be implemented to avoid any impacts upon such trees. An approved Aboricultural Method Statement (AMS) would be adopted incorporating best guidance set out in BS 5837:2012 Trees in Relation to Design, Demolition and Construction which would ensure retained veteran/ancient trees are not adversely affected during the operational phase (maintenance and panel/battery replacement). Further information is provided in **ES Volume 3, Appendix 7.10 Preliminary AIA [EN0110014/APP/6.3.7.10]**.
Ecology and Biodiversity	There are numerous areas of mixed deciduous woodland within the proposed site area or adjacent to it. Some of these are isolated fragmented woodlands within the landscape. Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory	Yes	The Scheme design has sought to enhance landscape connectivity, which includes the enhancement of existing habitat and creation of new habitats which serve to strengthen the connections to existing woodland blocks, as detailed within the **OLEMP [EN0110014/7.4]**, a detailed version of which will be secured via a Requirement of the DCO.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	(England). They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 “Duty to conserve and enhance biodiversity” and Sect 41 – “List of habitats and species of principle importance in England”. Paragraph 187b of the NPPF (Dec 2024) states: *“Planning policies and decisions should contribute to and enhance the natural environment recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”* Fragmentation is one of the greatest threats to mixed deciduous woodland. Loss of habitat connectivity is a particular concern where the woodland could become isolated in its landscape and surrounded by development on several sides, which is the case with several of the woodlands affected by this development. This is also a particular concern for the ancient woodlands, particularly in the case of Ringers Grove which would be enclosed by development on three sides and a road on the other side.		

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Ecology and Biodiversity	These woodlands can also suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development.	Yes	The Scheme has included woodland habitat buffers (15m for woodland and 30m for ancient woodland). The Scheme design has sought to enhance landscape connectivity, which includes the enhancement of existing habitat and creation of new habitats which serve to strengthen the connections to existing woodland blocks, as detailed within the **OLEMP [EN0110014/7.4]**, a detailed version of which will be secured via a Requirement of the DCO. Pollution prevention measures are detailed within the **OCEMP [EN0110014/APP/7.1]**. Further information on dust avoidance measures is provided within **ES Volume 3, Appendix 13.1 Construction and Decommissioning Dust Risk Assessment [EN0110014/APP/6.3.13.1]**.
Ecology and Biodiversity	We note from the masterplan that environmental mitigation areas are planned, including some woodland groups. Ideally, we would like to see woodland creation carried out in 5ha blocks or that connecting planting with existing woodlands should create blocks of at least 5ha. Connectivity across the site could be improved and enhanced further with larger blocks of woodland creation and woodland edge.		The Green Strategy Plan as detailed in Appendix B in the **OLEMP [EN0110014/APP/7.4]**, seeks to improve habitat connectivity. However, the proposed creation of large 5 ha woodland blocks would conflict with the existing open landscape character within the Order Limits. Such a large-scale woodland feature would appear out of keeping with the prevailing landscape pattern, which is characterised by open agricultural fields and limited enclosed woodland cover. In addition, establishing large woodland blocks does not support the aim of the development as solar development in most locations.
Landscape and Visual	Paragraph 4.3.20 of the Overarching National Policy Statement for Energy (EN-1) states: *"The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste*	No	The Applicant notes this comment. Proposed woodland, hedgerow and linear belt of trees as detailed within the **OLEMP [EN0110014/7.4]** serve to strengthen the connections to existing woodland blocks. The Scheme has been informed by Natural England's Statements of Environmental Opportunity (SEOs), with the design responding to each relevant objective. This includes supporting the creation and restoration of field-edge

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act." It is important that woodland creation is not just used as screening at strategic locations and ensures habitat connectivity throughout the landscape. Planting in advance of development could also help mitigate any potential negative effects on the existing woodland.		habitats through new grassland, enhanced and newly planted hedgerows, linear tree planting, scrub and woodland creation, and the reinstatement of former pond features. These measures help deliver stronger ecological networks across the farmed landscape. The Scheme has also been arranged to minimise visibility from nearby recreational routes, supporting the conservation of local tranquillity. Further information can be found in the **Design Approach Document [EN0110014/APP/7.17]**. These measures are secured in the **OLEMP [EN0110014/APP/7.4]**.
Ecology and Biodiversity	Active management of woodlands, especially ancient woodlands, is essential for a host of reasons but crucially to create and maintain the valuable biodiversity element of these habitats. This diversity leads to greater resilience of the woodland ecosystem. The diversity and benefit of woodlands will be lost over time if they are neglected. These interventions are also crucial in the face of climate change where active management is needed to help woodlands adapt.	No	No ancient woodland parcels are located within the Order Limits and therefore will not be subject to long-term management practices, however, habitats located within the Sites, including habitats within the 30m ancient woodland buffer zones will be managed and enhanced; strengthening woodland connectivity in the long-term; as detailed within the **OLEMP [EN0110014/7.4]**, a detailed version of which will be secured via a Requirement of the DCO.
Ecology and Biodiversity	The diversity and benefit of woodlands will be lost over time if they are neglected. These interventions are also crucial in the face of climate change where active management is needed to help woodlands adapt. The species and provenance of new trees and woodland needs to be considered to ensure a	Yes	**ES Volume 3, Appendix 8.10 Outline Protected Species Mitigation Strategy [EN0110014/APP/6.3.8.10]** provides details regarding the avoidance of invasive species spread, with further commitment to avoidance and monitoring detailed within the **OLEMP [EN0110014/7.4]**, detailed versions of which will be secured via a Requirement of the DCO.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, especially in areas where there are ancient woodlands. Plans should also be in place to ensure the long-term management and maintenance of new and existing woodland, including the removal of any invasive species currently present. Perhaps by creation of a UK Forestry Standard compliant management plan, with access also needing to be considered for future management.		
Ecology and Biodiversity	As a large-scale project, this proposal has scope to exclude significant amounts of farmland from the deer range in this area. Species affected will be red, roe and muntjac which are widespread, and less significantly Chinese water deer. This is likely to increase herbivore browsing and grazing to other areas in close proximity to the site. Impacts are likely to increase in surrounding woodlands and the wider landscape, where hedgerows and stewardship schemes are likely to be impacted upon. Large scale fencing will change how deer move through the landscape, which may increase the numbers of deer crossing local roads and therefore may also increase the numbers of deer vehicle collisions in the area. There is already a high risk of deer collisions, an assessment of any increase of this risk should be undertaken. If culls	No	Deer species are not legally protected within England, and some species such as muntjac and water deer are invasive non-native species. Deer's will be primarily prevented from accessing land parcels which are currently used for arable farming. The dissuasion of deer from farmland is a regular requirement where the deer species impact crop production. The Scheme includes the retention of green linear routes outside of the perimeter fencelines and the retention of arable parcels at multiple locations throughout the Order Limits, which enable the movement of deer across the landscape. Further information can be found in the **OLEMP [EN0110014/APP/7.4]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	occur prior to development, the risks should reduce.		
Landscape and Visual	To meet planning policy and Government guidance, we would recommend: • Detailed plans for protection measures for the woodlands during the construction. • Maintain and where possible, improve woodland creation, especially ancient woodland. • Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximum biodiversity benefits by embracing irreplaceable and high priority habitats – for example, focussing on ecological enhancements and creation of woodland edges. • Overall increase in the tree canopy cover to contribute to the Government's target to increase tree and canopy cover to 16.5% of land area in England by 2050. • A UK Forestry Standard compliant woodland management plan, including deer and squirrel control, is created to ensure the long term maintenance of all new and existing woodland within the site.	Yes	Protection measures for woodlands are provided in the OCEMP [EN0110014/APP/7.1]. The habitat surrounding existing woodland and ancient woodland would be improved; this includes improvement on grassland and habitat connection. Details of green infrastructure and habitat creations are included in OLEMP Appendix 2 Figure 2: Green Infrastructure Strategy [EN0110014/APP/7.4]. The DCO submission includes the provision of the Biodiversity Net Gain Report [EN0110014/APP/7.23] Schemes Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24] which have included these advised measures. Woodland creation is part of the current landscape proposal. New woodland will be managed to maintain a dense low canopy that provides effective visual screening to sensitive receptors. A scrub / shrub layer within the woodland would be encouraged through inclusion of scrub / shrub species. Where appropriate, biodiversity and green infrastructure will be implemented through creation of diverse native species habitat and planting structures that link to existing wildlife corridors and provide opportunities for shelter and foraging for a range of species. This is detailed in the **OLEMP [EN0110014/APP/7.4]**, a detailed version of which will be approved by the relevant planning authority pursuant to a Requirement in the **draft DCO [EN0110014/APP/3.1]**. The Scheme would increase the overall tree canopy of the Order Limits, but the Order Limits is located within a predominantly open landscape with occasional woodland block, a significant increase in tree cover would not be in keeping of the landscape character and would not be compatible with the type of development proposed.

1.26 Seething Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
General	We agree with the need to install ground-mounted solar infrastructure. We require changes to be made such that we are able to support the proposals.	No	The Applicant welcomes comments agreeing for the need for ground-mounted solar infrastructure, as outlined in the **Statement of Need [EN0110014/APP/7.11]**, NPSs confirm that ground mounted solar farms have a critical role to play in achieving the government's energy policy aims. The Applicant will take into consideration all submissions of feedback Seething Parish Council and other relevant statutory bodies.
Reasonable alternatives and Design Evolution	Seething Parish Council recognise that in the context of our climate emergency, ground-based solar PV is a necessary component of a rapid transition from carbon intensive fossil fuel to renewable energy sources. Such schemes should be developed alongside solar PV retrofitment on existing industrial and commercial roofs and where possible, all new builds	Yes	The Applicant agrees that ground-mounted solar should be developed alongside rooftop solar where possible. The **Statement of Need [EN0110014/APP/7.11]** explains Achieving the Clean Power 2030 range through the roadmap's illustrative deployment scenario will require a doubling of current domestic and sm Achieving the Clean Power 2030 range through the roadmap's illustrative deployment scenario will require a doubling of current domestic and smaller scale commercial scheme capacities (estimated at circa. 10GW in 2024) before 2030. This would also necessitate a doubling of installation rates of domestic and smaller scale commercial solar capacity versus recent year averages. Any shortfall in the deployment of these schemes must be made up for by other technologies, including from large scale schemes, if the UK Solar Roadmap Current Policy Scenario for solar capacity is to be achieved. Many sites, including brownfield sites and rooftops, may simply not be suitable. They may be in areas of low solar irradiance, have unfavourable topography or be too small to develop effectively. Many brownfield sites, including those in more built-up areas, may be needed for other uses and may therefore already allocated in local plans for housing or commercial development. Others may have remediation issues which render sites unavailable for solar development given potential costs or liabilities associated with cleaning up after

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			prior activities. Others may be located far away from existing grid infrastructure or refused planning consent. In relation to roof space, larger commercial structures or buildings with shared roof space may have contractual issues relating to ownership, occupation, and upkeep which must be resolved prior to any solar development or may not be resolvable in a timely and efficient way. Any roof space sloping to the north will be unsuitable for solar panels. Smaller buildings listed buildings or those with period features are also likely to be less suitable for rooftop solar panels.
Cumulative impact	Whilst geography, weather patterns and grid availability may favour Norfolk as a site for such ground-based solar developments, it is essential that the environmental and ecological impacts of any such scheme are considered in the context of other neighbouring schemes (e.g. Tasway Energy Park; High Grove scheme) rather than individually.	Yes	The impact of solar developments (both existing and forthcoming) in the areas surrounding the Scheme has been fully assessed within the **ES [EN01100141/APP/6.1]**. Existing solar farms are considered in the baseline of each technical chapter (**ES Volume 1, Chapter 7 - 20 [EN0110014/APP/6.1]**). Forthcoming solar developments are assessed within the cumulative and in-combination effects section of each technical chapter (**ES Volume 1, Chapter 7 - 20 [EN0110014/APP/6.1]**) and summarised in **ES Volume 1, Chapter 19 – In-combination effects Assessment** [**[EN0110014/APP/6.1.19]**. Tasway Energy Park is indefinitely paused.
Climate change	Furthermore, the carbon footprint of the solar PV panels and infrastructure themselves must be overtly considered. Specifically regarding section 6.2.40 of the PEIR document, we consider that the use of panels manufactured using coal or other fossil fuel intensive sources would be detrimental, and the carbon costs of transport from site of manufacture to final location must be factored into the scheme. Similar considerations would be required for decommissioning the scheme.	Yes	The Applicant has considered emissions associated with embodied carbon from raw material extraction and transportation from an assumed worse case origin of manufacture (China) to the final location. Assessment of emissions has been considered from the construction phase, operation and maintenance phase through replacement of solar panels, and decommissioning phase within **ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6]**.
Deconstruction and commissioning	Construction and management of the scheme must be favourable in terms of local employment opportunity, and the sourced materials must not be manufactured by questionable labour schemes outside UK control.	Yes	The Applicant has prepared an **Outline Skills Supply Chain and Employment Plan [EN0110014/APP/7.10]** which sets out the Applicant's approach to employment.

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			Island Green Power is part of the Solar Energy UK Supply Chain Commitment, which binds the Applicant to ensuring that its supply chains are free of slavery. As part of this, the solar sector in the UK and Europe has launched the Solar Stewardship Initiative, which independently inspects and certifies individual factories for sustainable and ethical practices. The Applicant would expect to source its panels from factories that are SSI-accredited.
Soils and agriculture	For any large-scale solar PV scheme to be acceptable to Seething Parish Council, the visual, environmental, and ecological impacts must be minimised (these will be further considered in the next section) and the scheme must not result in irreversible change of land classification from agricultural to commercial or industrial use. We would therefore expect that the statements made in paragraphs 8.5.8 and 15.6.40 of the PEIR document guarantee the return of the site(s) to future agricultural use following decommissioning. Furthermore, and pertinent to statements within section 15.2.1, it is imperative that the scheme prioritises the placement of solar PV on agricultural land of poor quality, rather than compromising more productive soils.	Yes	Mitigation measures to reduce visual impacts are outlined in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and ecological mitigation measures outlined in **ES Volume 1, Chapter 8 - Ecology and biodiversity [EN0110014/APP/6.1.8]**. Agricultural Land Classification assessment details can be found in **ES Volume 3, Appendix 15.1 - Agricultural Land Classification [EN0110014/APP/6.3.15.1]**. As assessed in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15]**, across the great majority of the Order Limits there will be no impact on agricultural land quality. In localised areas, to accommodate tracks, Substations etc, there will be some disturbance, but this is mostly temporary and will be restored on decommissioning. The details of the temporary and permanent land take, on a likely and worst-case basis, are set out in Chapter 15. Following decommissioning, the land will be returned to landowners and will be available for arable or other agricultural cropping. The approach to micro-siting of items of fixed equipment is described in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15].**
Socio-Economics	It is crucial that the scheme does not impede rights of way; be they existing on current OS and definitive maps, or historic and subject to future reinstatement (see https://www.gov.uk/government/news/government-steps-in-to-save-historic-rights-of-way-from-beinglost- to-the-nation)	No	Effects on PRoW are considered in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**.

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Transport and Access	Regarding rights of way affected by site 10A-10E and CRC14 (Seething and Woodton), it must be acknowledged that the following Seething PRoW are unaccounted for in PEIR Documents and Appendix 11.3: Existing Seething and Woodton PRoW: Historic Seething RoW (detailed in OS Maps 1946 revision; published 1951): • Hobbs Lane running south from Harvey Lane at Grid Ref: TM 30429 95801 to join Pound Lane at Grid Ref: TM 29854 95164. This Historic byway runs within site 10C • Loxley Lane running south from Harvey Lane at Grid Ref: TM 31001 95494 to join Wash Lane at Grid Ref: TM 30812 94885. This Historic byway runs within site 10B • Dairy Lane running east from Hobbs Lane at Grid Ref: TM 30721 96340 to join Upgate Road at TM 31384 96050. This Historic byway runs within site 10E and CRC14	Yes	The Applicant has considered 22 Recreational Receptors for Site 10 and CRC14 in its Visual Baseline (**ES Volume 3, Appendix 7.4 - Visual Baseline [EN0110014/APP/6.3.7.4]**). Table 2.22 provides a summary of visual receptor sensitivity for Site 10 and CRC14. The following viewpoints have been assessed: • VL5, adjacent to Site 10, PRoW Hedenham RB9 on Harvey Lane/Upgate Road. • VL8, adjacent to Site 10, PRoW Woodton RB3 on Pound Lane (Track). • VL10, internal (Site 10) Wash Lane / Byway. The visual sensitivity of these views is considered to be Medium. Sensitivity has been assigned given recreational users of local PRoW generally have a moderate interest in their surroundings. As set out in the **Design Principles, Parameters and Commitments** document **[EN0110014/APP/7.18]**, all PRoW will have an offset buffer of at least 15m. Therefore, PRoWs will be located within an open corridor.
Transport and Access	Regarding rights of way affected by site 10A-10E and CRC14 (Seething and Woodton), it must be acknowledged that the following Seething PRoW are unaccounted for in PEIR Documents and Appendix 11.3: Existing Seething and Woodton PRoW: • Wash Lane runs west from Seething Road at Grid Ref: TM 31074 94780 to join Pound Lane and Woodton RB3 at Grid Ref: TM 29875 94959. This Norfolk CC Maintained Unsurfaced road runs between / within sites 10A and 10B • N.B. Woodton RB3 does not feature in PEIR Appendix 11.4	Yes	The Applicant can confirm that Wash Lane and the connecting route Woodton RB3 has been included at ES stage, with further detail and proposed mitigation included within **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7], ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**, and **ES Volume 3, Appendix 7.9 - PRoW Visual Amenity Assessment [EN0110014/APP/6.3.7.9].** While moderate adverse (Significant) impacts are anticipated at the construction phase, this will change to minor adverse at Year 1 of operation and negligible (Not significant) at Year 15. Proposed mitigation in relation to Wash Lane includes: • A native linear tree belt on the western boundary of Sub-Site 10A; • Native broadleaf woodland planting to the western boundary of Sub-Site 10B;

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			• hedgerow enhancements along the majority of Wash Lane where it meets Sub-Site 10A; and, • native linear tree belt, native broadleaf woodland, and infill planting to the southern boundary of Sub-Site 10B. These measures are secured via the **OLEMP [EN0110014/APP/7.4] and OCEMP [EN0110014/APP/7.1].**
Landscape and visual	To be acceptable to Seething Parish Council, it is essential that the visual impact of the solar PV scheme is minimised, especially in areas adjacent to residential property or footpaths, bridleways and byways.	No	Landscape mitigation measures, including woodland planting, hedgerow planting and hedgerow enhancement, are proposed to help reduce potential visual impacts. Details of landscape mitigation are presented in the **OLEMP [EN0110014/APP/7.4]**.
Landscape and visual	Therefore, expanding upon your embedded mitigation statement (section 7.5.2), we deem panel heights of 3.5m or greater in these areas would be unacceptable, and either offsetting of panels and / or lower panel heights (2-2.5m) are mandatory in these areas to enable effective screening by hedgerow and other biodiversity mitigation schemes. This may permit a graded escalation of panel height toward the centre of arrays.	No	The Applicant can confirm that the maximum panel height would be 4.5m for single-axis tracker panels (Option A). However, the Applicant notes that the solar panels would be offset from PRoWs by a minimum of 15m which, in addition to planted screening, would help to screen panels of a height of 4.5m.Minimum Offsets/Buffers from Existing Features can be found in **ES Volume 1, Chapter 4 - The Scheme [EN01100141/APP/6.1.4]**.
Ecology and biodiversity	Expanding upon sections 8.7.76-77, the construction and operation of the solar arrays and associated infrastructure must not result in destruction of existing native hedgerows, trees or uncultivated meadow and pasture.	No	Landscape mitigation measures, including habitats retention measures are detailed within the **oLEMP [EN0110014/APP/7.4].** The Scheme design has sought to retain/protect/enhance important ecological features as much as practicable.
Ecology and biodiversity	Biodiversity net gain must be achieved by supplementation and reinforcement alongside existing hedgerows, rather than replacement with new planting. With reference to sections 5.5.17 and 15.4.2, we strongly support the management of the soils beneath the arrays as wildflower meadow and pasture for sheep grazing: conversely, herbicide, gravelling or other	No	The Scheme includes the provision of a variety of grassland mosaics, the landscape mitigation measures, including grassland habitat retention and management measures are detailed within the O**LEMP [EN0110014/APP/7.4].**

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	strategies that suppress vegetation (and thereby have adverse effects upon ecology and biodiversity) are wholly unacceptable.		
Ecology and biodiversity	Section 8.5.5 is a cause for concern to Seething Parish Council: whilst we recognise the mitigation measures stated regarding the permeability of perimeter fencing to native fauna, this appears only to apply to small mammal species.	No	The perimeter fencing will allow for the movement of a variety of 'medium-sized' mammal species (if present) including badger, red fox, otter, polecat, muntjac fox, for example. Further information is provided within **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [EN0110014/APP/6.3.8.10]** and the **OLEMP [EN0110014/APP/7.4].** The perimeter fencing will only displace medium-large deer species.
Ecology and biodiversity	The impact of the scheme upon wildlife corridors for larger mammals – notably the multiple deer species of our local environment and ecology is inadequately addressed in the document. The final sentence of 8.5.8 relating to decommissioning is highly pertinent - Perimeter fence removal will enable larger species (e.g. deer) to utilise the entire Site footprint again.	No	Deer species are not legally protected within England, and some species such as muntjac and water deer are invasive non-native species. Deer will be primarily prevented from accessing land parcels which are currently used for arable farming, the dissuasion of deer's from farmland is a regular requirement where the deer species impact crop production. The Scheme includes the retention of green linear routes outside of the perimeter fencelines, which enable the movement of deer across the landscape.
Ecology and biodiversity	Specifically, CRCs must not compromise uncultivated and / or ancient meadow or pasture, nor compromise established native hedgerow, woodland and ponds. Pertinent to section 5 of the PEIR documents,	No	The Scheme's design evolution has sought to avoid important ecological features, such as field boundary hedgerow and ditch networks, watercourses, and woodlands. Temporary CRC works have avoided features such as watercourses and lowland fen through Horizontal Directional Drilling (HDD). Further information regarding species-specific safeguards is provided withint ES **Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [EN0110014/APP/6.3.8.10].** Embedded avoidance and mitigation measures associated with the HDD operations are provided within **oCEMP [EN0110014/APP /7.2]** and the **Outline Cable Route Construction Statement [EN0110014/APP /7.21].**
Cable Route Corridor	Many, if not all, of the above paragraphs relating to visual impact, ecology, carbon cost, agriculture, biodiversity and protection of rights of way are equally pertinent to cable route corridors.	No	The Applicant notes this comment.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Compulsory Purchase / Acquisition	Seething Parish Council wholly object to the concept of the use of compulsory purchase orders where they might be considered to facilitate the scheme.	No	The Applicant confirms that there is no intention to compulsorily purchase any homes for the Scheme. Part of the purpose of the land referencing activities undertaken is to enable the Applicant to understand land interests so that impacts to homes and gardens can be avoided. A letter was distributed on 24 July 2025 which re-iterated that the Scheme does not intend to compulsory purchase of any homes, gardens or buildings, and has never been part of the proposals.
Community benefits and impact	Considering the impact of large scale solar PV schemes to a local community, the most obvious and beneficial mitigation would be that of improved local energy security and reduced energy costs to those affected by such schemes. We recognise that the UK currently has a national pricing model that currently precludes such mitigation. It is therefore incumbent upon the developer to petition the Secretary of State for Energy Security and Net Zero such that a shift to a zonal pricing scheme (akin to Scandinavia and Australia) can be established to permit such measures.	No	The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The wider effects of the Scheme on the local community in terms of socio-economics are assessed within **ES Volume 1, Chapter 14 – Socio-Economics [EN0110014/APP/6.1.14]** and a detailed Employment, Skills and Supply Chain Strategy will be secured through the Requirements of the **draft DCO [EN0110014/APP/3.1]**. The Applicant is not in a position to petition the Secretary of State in relation to national energy policy in relation to this application.

1.27 South Norfolk Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Scheme Description	South Norfolk Council raises a Strong Objection to the principle of the proposed project, together with technical and procedural grounds. This objection is made without prejudice to any future	No	The Applicant notes this and responds to the various points detailed below.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	representations, including the Local Impact Report and representations at Examination. The Council understands that the project would assist in meeting the UK's energy ambition to achieve net zero carbon emissions by 2050 and the Government's Clean Energy target of 2030. We are supportive of renewable energy schemes demonstrated by consented TCPA planning applications within South Norfolk and the Council's own offices and its initiatives. The Council raises significant objection at this stage due to the lack of clarity and accessibility in the PEIR with key technical appendices (on ecology, cumulative impacts, landscape impact etc) either incomplete or insufficiently detailed at this stage. The technical assessment that follows sets out some of the issues with the level of information and therefore the extent to which the applicant has sufficiently grappled with these issues and therefore engaged us and the community on these at this stage.		
Cumulative impacts and in-combination effects	The Council is aware of a number of NSIP Solar Farms potentially coming forward within this part of South Norfolk; the recent pre-application for Tasway Energy Park for at 700MW Solar and BESS NSIP, together with consented and proposed TCPA schemes. Norwich to Tilbury National Grid NSIP which is about to be submitted formally for its Development Consent Order and the consented National Highways and Off-Shore windfarm NSIPs. The significant cumulative impact, these Projects and TCPAs will have on our District has not been adequately explored and is of serious concern. Given the seriousness of our concerns, the Council	No	The assessment of cumulative scheme is set out within the technical chapters of the (**ES: Chapters 6-18 [EN0110014/APP/6.1.6 - 6.1.8]**), with the full list of cumulative schemes assessed provided in **ES Volume 3, Appendix 2.4 Cumulative Schemes [EN0110014/APP/6.1.6 - 6.3.2.4]**. This includes the other relevant NSIP projects noting the Tasway Energy Park which has been placed on indefinite hold. The cumulative assessment has identified the following cumulative effects of the Scheme and the cumulative schemes that could be significant during the construction and decommissioning phases: • Major Beneficial and Moderate Beneficial socio-economic effects on jobs, employment and the supply chain

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	is unable to support the proposed East Pye NSIP and raises a strong formal objection.		• Moderate Beneficial socio-economic effect on skills and the labour market The assessment has identified the following cumulative effects of the Scheme that are predicted to be significant during the operation phase: • Significant Beneficial effect on water quality • Moderate Beneficial socio-economic effects on jobs, employment and the supply chain • Moderate Beneficial socio-economic effect on skills and the labour market • Moderate Adverse effect on hazardous waste The assessment has identified the following cumulative effects of the Scheme that are predicted to be significant during the decommissioning phase: • Moderate Adverse effects on agricultural land • Moderate Adverse effects on hazardous waste
Consultation and engagement	The Council considers that there has been inadequate consultation and engagement to date, there has been no topic/thematic/technical workshops/meetings with our technical specialists for example, the contact has been via emails and limited, which is strikingly different from the Council's experience with other NSIP developer at pre-application stage. This together with the level of information available has meant that the Council considers at this point in time that the applicant has failed to meet the statutory requirements under Sections 42, 47 and 48 of the Planning Act 2008.	No	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008 (PA2008), the Environmental Impact Assessments (EI) regulations, and the Infrastructure Planning (applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant's Phase Two consultation (which was statutory under sections 42 and 47 of the PA2008) was carried out in line with commitments and principles established in the Applicant's published Statement of Community Consultation (SoCC). As required by section 47 of the PA 2008, the Applicant consulted with the local authorities, including South Norfolk Council, on a draft of the SoCC and had due regard to their comments in updating the SoCC for publication ahead of commencing statutory consultation. Chapter 6 of the **Consultation Report [EN0110014/APP/5.1]** describes the process of preparing the SoCC, including the Applicant's consideration of comments received from South Norfolk Council (Table 7-3) and adherence to commitments made in the SoCC (Table 7-5).

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			Chapter 7 and Chapter 8 of the **Consultation Report [EN0110014/APP/5.1]** provides further details on how the Applicant undertook statutory consultation in line with the relevant requirements of Section 47 and Section 42 of the PA2008 respectively. The Applicant publicised the proposed Application in the manner prescribed by Section 48 of the PA2008. The Section 48 Notice was published in the following publications: • Diss Express - 6 June 2025 and 13 June 2025; • Eastern Daily Press - 11 June 2025 and 18 June 2025; • The Guardian - 16 June 2025; and • London Gazette - 18 June 2025. Chapter 9 of the **Consultation Report [EN0110014/APP/5.1]** provides further details of how the Applicant has complied with Section 48 of the PA2008.
Landscape and Visual	Chapter 7: Landscape and Visual (pages 5/6) – it would be good to include the terms 'restoration' and 'reinstatement' of hedgerows. This is an opportunity for a large-scale improvement and, where appropriate, to plant new hedgerows along historic lines. Reference should be made to BS5837 and other tree protection advice (such as that for veteran trees) within Chapter 7 (in addition to refs in Chapter 8 commentary).	Yes	Existing Hedgerow Measures and Improvements are detailed in **Outline Landscape and Ecology Management Plan [EN0110014/APP/7.4]**, Appendix B Green Infrastructure. It includes hedge laying, coppicing and infill planting.
Transport and access	I could see no reference to safeguarding PRoW access during works, or indeed any benefits in this regard.	Yes	The **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** has considered the impact of the Scheme on PRoW in all phases and identified mitigation including provision of an **Outline Public Rights of Way and Permissive Paths Management Plan [EN0110014/APP/7.8]**.
BESS	3.13: For ease of reference, could the BESS site be annotated on the plans, as the two colours used to show the Sites and this are similar	Yes	**ES Volume 2, Figure 4.1 [EN0110014/APP/6.2.4.1]** shows the location of the BESS Site, which is labelled and differentiated from the Project substations and the new National Grid Substation.
Ecology and biodiversity	3.15.6: It is worth mentioning that existing gaps can be replanted as part of mitigation/enhancement.	No	Mitigation measures, including habitat enhancements, are provided in the **Outline Landscape and Ecology Management Plan [EN0110014/APP/7.4]**. Existing hedgerow improvement measures include hedge laying, coppicing and infill planting.
Transport and Access	5.2.59: We would expect that the route of the proposed cable runs would seek to avoid tree roots	Yes	In accordance with the **Design Principles, Parameters, and Commitments [EN0110014/APP/7.18]** generally tree removals within the Order Limits have been

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	completely 5.2.63: Trenchless crossings might be required if tree roots cannot be avoided. 5.2.67: Access should be designed to avoid loss of any trees, regardless of the status. Consideration should be given to utilising temporary traffic management (such as traffic lights) in order to achieve temporary access during construction without the need to remove mature trees unnecessarily. Table 5.1: It might be worth adding veteran trees as a criterion in its own right.		avoided wherever possible. However, to facilitate construction and implementation of the Scheme select and targeted tree removals are identified within **ES Volume 2, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10]**. Existing trees and woodland will be reassessed prior to construction, and this will help inform the measures in the detailed LEMP, secured by **Requirement 7 of the draft DCO [EN0110014/APP/3.1].** Furthermore, an Arboricultural Method Statement (AMS) will be adopted incorporating best practice guidance set out in British Standard 5837:2012 'Trees in relation to design, demolition and construction'. The AMS will ensure retained trees are not adversely affected during the construction works. In the AIA, five trees are identified for removal, with a further 38 identified for partial removal. 11 trees are identified as being potentially impacted by the trenched open cut construction of the cable route; however, the impact can potentially be mitigated through implementation of specialist root protection measures and strict arboricultural supervision, as detailed in and secured through the **Outline LEMP [EN0110014/APP/7.4]**. While the CRC routing considered aspects including avoiding existing landscape and ecological features such as woodland, trees, ponds, watercourses/ditches as far as practicable, it would not be feasible to design a route that avoids all roots, or to implement trenchless solutions to avoid these roots. Further detail regarding the routing of the CRC is detailed in **ES Volume 1 Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5]**. Tree pruning will be required to facilitate the site access. Several trees will require low lateral branches to be shortened and crown lifted prior to the installation of protective fencing and prior to the commencement of construction works. Veteran trees have been considered alongside ancient trees within the **Preliminary Arboriculture Impact Assessment (ES Volume 2, Appendix 7.10 [EN0110014/APP/6.3.7.10])**. A total of 70 ancient or veteran trees within or adjacent to 15m of the Order Limits are plotted on the TCP in Annex C, consisting of 56 individual trees identified during the survey as ancient or veteran trees and 14 individual trees designated as ancient or veteran in the ATI. The Scheme will avoid the buffer zones of all ancient or veteran

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			trees identified within or adjacent to the Order Limits, as detailed in and secured through the **OLEMP [EN0110014/APP/7.4]**. The **OCTMP [EN0110014/APP/7.6]** outlines the proposed management and mitigation measures with respect to transport and access during the construction phase. Measures include the use of vehicle holding areas and adherence to designated routes (routes as detailed in the **OCTMP [EN0110014/APP/7.6]** and **ES Volume 1, Chapter 11: Transport and Access [EN0110014/APP/6.1.11]**). The **OCTMP [EN0110014/APP/7.6]** also includes concept site access drawings and visibility splays at each proposed access. The detailed design of bellmouths will seek to minimise the removal and alteration of vegetation and trees. This design approach will consider the use of temporary traffic management measures where that could limit impacts.
Landscape and Visual	Table 5.2 illustrates some significant key differences between tracker and fixed panel options; will these be considered separately by the LVIA?	No	**ES Volume 1, Chapter 7: Landscape and Visual [EN010168/APP/6.1.7]** assesses the worst case, therefore only the single-axis tracker panels (option A) would be assessed.
Landscape and Visual	The submitted landscape and visual information has been produced in accordance with the accepted industry guidance. It currently considers the project up to the point where it will be operational and, as such, offers a 'worst case' for anticipated landscape and visual effects. I have previously given feedback on the proposed viewpoint locations, and it is good to note that the majority (if indeed, all) of my suggestions have been addressed (including some additional viewpoint locations. The landscape and visual assessment thus far has identified that there will be adverse effects within both categories. This is not surprising given the nature and scale of the proposal. The Council recognises that the assessment work only considers the construction and immediate operation stages (Year 1), which will before any landscape-related mitigation (such as planting, hedgerow restoration etc.) will have had a chance to establish.	No	Noted. Year 15 is now assessed in **ES Volume 1, Chapter 7: Landscape and Visual [EN010168/APP/6.1.7].**

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	The undertaking to complete the landscape and visual assessment to include the Year 15 situation is noted and will be expected in order to inform the Council's input to the Examination. The Council is concerned about the potential for long-term and/or permanent significant landscape and visual effects that could result from this proposal. It is also noted that Chapter 19 (Cumulative and in-combination effects) also identifies significant adverse effects for the construction, Year 1 operation, and decommissioning stages; Year 15 Operation is yet to be assessed.		
Ecology and biodiversity	7.2.21 – Assessment of hedgerows against the 'importance' criteria set out in the Hedgerows Regulations 1997 is welcomed. The 'importance' or otherwise will be most pertinent in any situations where existing hedgerows are proposed for removal (whether partial or in full). The Council requests that this information be available at Examination stage. 7.2.22 – Trees may have an importance other than by virtue of being ancient and/or veteran. Definition will be helpful, and the term important might be confusing if referencing hedgerows at the same time. 7.5.2 (and elsewhere) - SNC takes the view that hedge-laying per se is not necessarily the only prescription; any appropriate management will be considered towards the greater aim of landscape restoration and enhancement.	Yes	Existing hedgerow enhancement and improvement measures include hedge laying, coppicing and infill planting. Details are secured in the **Outline Landscape and Ecology Management Plan [EN0110014/APP/7.4], Appendix B Green Infrastructure Strategy.** ES Appendix 7.10 Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10] provides a methodology and categories trees based on their conditions. As requested, hedgerows considered as important under the Hedgerow Regulations are also shown in **ES Volume 3 Appendix 10.2 Archaeological Desk Based Assessment [EN0110014/APP/6.3.10.2]**.
Ecology and biodiversity	In order to understand the full implications, the Council expects that a full arboricultural impact assessment for all proposed elements of the scheme be available for the Examination. The final scheme should demonstrate that arboricultural impacts will be avoided wherever possible. It is also expected that any off-site issues (for example to achieve	Yes	The Applicant can confirm that, in designing the Scheme, it has sought to avoid aboricultural impacts, with further information provided in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]**, alongside relevant mitigation, including the provision of a 15m offset from all trees and woodland, as secured through the **OLEMP [EN0110014/APP/7.4].**

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	temporary construction access) 1.1.4: includes: "The survey was primarily focused on the recording of ancient and veteran trees features" – The Council expects that the arboricultural information provided for the Examination accords proportional consideration of all trees that are potentially affected by the proposals. 1.2.10: As the accuracy of GPS positions cannot be guaranteed, if potential conflict exists then the Council considers that this should be confirmed on site prior to approval of scheme, not commencement of works		All trees, including those at access points or lying near to the Scheme, have been considered for the purposes of undertaking **ES Volume 3, Appendix 7.10 - Preliminary Arboricultural Impact Assessment (AIA) [EN0110014/APP/6.3.7.10],** which identifies a total of 737 tree features including 518 individual trees, 126 groups of trees, 74 hedgerows and 19 woodlands. 139 tree features were categorised as high A grade, 389 tree features were categorised as moderate B grade, and 195 were categorised as low C grade. Fourteen tree features were categorised as very low-quality U grade trees. The AIA identifies that the majority of the tree resource which are located within the Order Limits will be protected during construction and operation of the Scheme. Five trees are identified for removal with a further 38 identified for partial removal. 11 trees are identified as being potentially impacted by the trenched open cut construction of the cable route; however, the impact can potentially be mitigated through implementation of specialist root protection measures and strict arboricultural supervision, as detailed in and secured through the **OLEMP [EN0110014/APP/7.4]** . Furthermore, an Arboricultural Method Statement (AMS) will be adopted incorporating best practice guidance set out in British Standard 5837:2012 'Trees in relation to design, demolition and construction'. The AMS will ensure retained trees are not adversely affected during the construction works. Tree pruning will be required to facilitate the site access. Several trees will require low lateral branches to be shortened, and crown lifted prior to the installation of protective fencing and prior to the commencement of construction works. A total of 70 ancient or veteran trees within or adjacent to 15m of the Order Limits are plotted on the TCP in Annex C, consisting of 56 individual trees identified during the survey as ancient or veteran trees and 14 individual trees designated as ancient or veteran in the ATI. The Scheme will avoid the buffer zones of all ancient or veteran trees identified within or adjacent to the Order Limits, as secured through the **OLEMP [EN0110014/APP/7.4]**.
Ecology and biodiversity	1.2.13: Whilst it is appreciated that there will be instances when accurate measurements in the field are not possible, it is requested that the estimated diameters should be highlighted in the survey		**ES Volume 3, Appendix 7.10 Preliminary Arboricultural Impact Assessment (AIA) [EN0110014/APP/6.3.7.10]** provides a methodology for recording stem diameter. Diameters of trees are recorded at breast height (1.5m) for single-stemmed trees. For multi-stemmed trees with 2-5 stems, each stem is measured at 1.5m above

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	schedules. We would argue that, unless there are clear reasons otherwise, estimated values should be especially cautious. 1.2.19: Given the nature of the land uses for the proposed sites, the current absence of tree protection orders (TPOs) is not unusual; this merely indicates that there have been no 'threats' to warrant such interventions. The absence of TPOs should not be taken as an indication that no trees are present that would be worthy of formal protection. Furthermore 1.2.19 contradicts the information given in 1.1.6 regarding trees in conservation areas.		ground level and recorded, whilst for trees with 6 or more stems, an average stem diameter is recorded. Measured in mm, this figure allows calculation of the RPA. Off-site or otherwise inaccessible trees where accurate measurements cannot be obtained have been given estimated diameters that have been cautiously determined. The tree survey has identified the presence of TPOs, trees in Conservation Areas, alongside categorisation of tree grading in accordance with BS5387 (2012) and identification of veteran or ancient trees to inform the design approach. The Scheme will avoid the buffer zones of all ancient or veteran trees identified within or adjacent to the Order Limits, as detailed in and secured through the **OLEMP [EN0110014/APP/7.4]**. Existing trees and woodland will be reassessed prior to construction, and this will help inform the measures in the detailed LEMP, secured by Requirement 7 of the **draft DCO [EN0110014/APP/3.1]**. During the operational phase, as detailed in and secured through the **Outline OEMP [EN0110014/ APP/7.2]**, all maintenance and replacement activities near veteran trees will be supervised by an Arboricultural Clerk of Works (ACoW) to ensure no machinery or materials enter the Veteran tree buffer zone. This may be achieved through implementation of ground protection and/or tree protection fencing around the veteran tree buffer zones during maintenance and replacement activities. The Applicant acknowledges the contradiction identified by the respondent, and can confirm that this has been updated within the AIA. A search of the South Norfolk and Broadland District Council online search maps confirmed that 66 individual trees and one group of trees located either adjacent to or in the Order Limits are protected by Tree Preservation Order (TPO). The search also confirmed that five individual trees and three groups of trees are located in the Saxlingham Nethergate Conservation Area (CA) and Fritton CA.
Ecology and biodiversity	1.2.20: The Hedgerows Regulations are dated 1997; 2024 saw the introduction of The Management of Hedgerows (England) Regulations. 1.2.29: Whilst this mentions nine woodlands bordering the sites, only three woodlands are mentioned in 1.1.5, 1.4.2 and included in table 1.1 (Tree Quality Assessment Summary). There appears not yet to be an assessment of hedgerows against the 'importance'	Yes	Hedgerows considered important under the Hedgerow Regulations are discussed in **ES Volume 3 Appendix 10.2 Archaeological Desk Based Assessment [EN0110014/APP/6.3.10.2]**. Assessment of hedgerows has been undertaken in consideration of the 1997 regulations. The Applicant can confirm that the Tree Quality Assessment Summary table, appearing as Table 1.3 in **ES Volume 3, Appendix 7.10 - Preliminary Arboricultural Impact**

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	criteria of the Hedgerows Regulations 1997. It is expected that a full assessment against all the criteria will be undertaken for any hedges that are proposed to be removed for the scheme (including any works required offsite for access/transportation requirements).		**Assessment (AIA) [EN0110014/APP/6.3.7.10]**, has been updated and now includes 19 woodlands. Assessment of hedgerows to be removed will be undertaken; management of hedgerows to be removed will be undertaken in accordance with the Hedgerow Removal Plan at **Appendix A of the OLEMP [EN0110014/APP/7.4]**. Where removal is required, no more than 10m will be removed in accordance with the requirements set out within the OLEMP.
Ecology and biodiversity	Mitigation planting: Whilst no details are yet designed, experience of other electricity infrastructure schemes has shown that there can be potential issues and uncertainties in the provision of replacement planting if necessary outside the DCO extent, which then become reliant on landowner co-operation for the long term. This proposal has separate sites linked via cable connections that will run across land that is to be returned to agricultural use, so it will be imperative to establish clear responsibilities for the management of the mitigation planting and other landscape actions for the lifetime of the scheme.	Yes	Proposed landscape mitigation measures are secured in **OLEMP [EN0110014/APP/7.4], Appendix B Green Infrastructure Strategy.** These measures are all located within the Order Limits and include replacement planting for hedgerows removed to facilitate construction and laying of the cable route. In these instances, the replanted hedgerow will be the responsibility of the landowner following its establishment (5 years after initial planting). The management of all other measures will be the responsibility of the Applicant or their appointed agent.
Culture and heritage	Table 10.4 - There are no registered battlefields so this can be deleted. Rather than having Locally Listed Buildings, I would suggest Non-designated heritage assets. We do not have a local list of buildings as such, but we do identify building in conservation areas as being local significance as part of the planning process. There are local list buildings in neighbourhood plans – but this is not the local authorities local list so needs to be clearly identified as separately where they may exist so that it is clear how they have been identified. I am not sure what "Asset where the significance is limited by poor preservation and poor survival of contextual	Yes	This has been noted and included in **ES Volume 1, Chapter 10 - Cultural Heritage [EN01100141/APP/6.1.10**] and accompanying **Heritage Statement (ES Volume 3 [EN01100141/APP/6.3.10.1])**. Registered Battlefields are not considered in the above documents. Non-designated heritage assets meeting the criteria stated in neighbourhood plans and conservation area appraisals have been assessed in the above.

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	associations" If a building then this would affect whether we consider it a non-designated heritage asset if original condition/appearance of the building has been lost and or altered. It will also depend on use and historic relationships and what values are placed on those types of significance, and whether these of more significance than physical appearance e.g. former school building that has been significantly altered. It should be clear in the ES what significance is being attached to an NDHA as this will consequently affect how the proposals will impact upon it.		
Culture and heritage	10.4.7 - "SNC refers to Locally important buildings in their neighbourhood plans which they regard as non-designated heritage assets" – should be clear what assets that have been identified in neighbourhood plans and not by the local authority as selection criteria can differ between different neighbourhood plans.	No	The Applicant notes this and has addressed this in the **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**
Culture and heritage	10.5.2 - "For indirect impacts to heritage assets through changes to their settings, this embedded mitigation involves the incorporation of appropriate setbacks, buffers and landscaping to minimise infringement on any views. I consider it important here that any mitigation such as planting should be designed in a manner that also fits in and is contiguous with the landscape character, which contributes to the setting." E.g. selecting right tree species, character of woodland to fit in with existing character such as wooded plantations. Poor planting schemes can in themselves be considered harmful.	Yes	The choice of tree species has considered the local character and also the potential for impact on below ground archaeological remains. An indicative species list is included within the **OLEMP [EN0100114/APP/7.4]**, but species will be firmed up during requirement discharge at detail design.
Culture and heritage	As state above Peir report Vol II Figures 9.11-21 showing HER monument records and Figures (i.e. potentially showing non-designated heritage assets that have been identified) is not very clear for	Yes	Figures accompanying **ES Volume 1, Chapter 10 - Cultural Heritage [EN01100141/APP/6.1.10**] and the relevant appendices have been amended for clarity where possible.

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	assessment. Similarly figure 10.1 to 10.10 do not show clearly the location of the heritage asset and surrounding character in terms of map form – and is no better when zoomed in. This similarly affects consideration of viewshed and ZTV maps. It would be better if these were larger scale or at least the ability to zoom in to get a clearer understanding of the ways in which the setting and contribution to significance can be appreciated.		
Culture and heritage	As with above, at present the masterplan has been produced showing proposals for mitigation which shows areas for landscaping, although there is as yet no detail on how these will be designed and how these seek to mitigate any harm to the setting of heritage assets arising of the type of screening provided. It is important to note that although screening may help to mitigate harms arising it may not fully remove them, and can potentially result in its own harm, such as removing existing views and relationship a heritage asset has to it context such as being adjacent to open countryside – a farmhouse within the setting of its agricultural fields for example. Screening may also block important views such as views of heritage assets from public footpaths for example. Para 39 of the HE Setting guidance that states: "For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence or noisiness of a development. In other cases, good design may reduce or remove the harm, or provide enhancement. Here the design quality may be an important consideration in determining the balance of harm and benefit. Para	Yes	The potential effects of screening through landscape mitigation have been assessed within the **ES [EN01100141/APP/6.1]**. Screening in itself may be harmful to heritage assets if not done appropriately and this has been addressed in the ES. Mitigation through landscape screening has been detailed there, and where there is a potential impact this has been stated.

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	40 emphasises the importance of well-designed screening. This will be particularly important where it is in close proximity to assets affected and may also result in other impacts such as views within the wider setting and the relationship between built development and landscape character. Para 40 of the guidance states: "Where attributes of a development affecting setting may cause some harm to significance and cannot be adjusted, screening may have a part to play in reducing harm. As screening can only mitigate negative impacts, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments within the setting of heritage assets. Screening may have as intrusive an effect on the setting as the development it seeks to mitigate, so where it is necessary, it too merits careful design. This should take account of local landscape character and seasonal and diurnal effects, such as changes to foliage and lighting. The permanence or longevity of screening in relation to the effect on the setting also requires consideration. Ephemeral features, such as hoardings, may be removed or changed during the duration of the development, as may woodland or hedgerows, unless they enjoy statutory protection. Management measures secured by legal agreements may be helpful in securing the long-term effect of screening.		
Ecology and biodiversity	Ecological enhancements Potential ecological enhancement options being explored are identified in section 5.2.76 and it is requested that consideration is also given to the creation and/or restoration of ponds (see Appendix 1 below for details of the ghost pond layer which is available again), and veteranisation of trees to create more natural	No	In accordance with the **Design Principles, Parameters, and Commitments [EN0110014/APP/7.18]**, landscape and ecological features across the Order Limits, including woodland, hedgerows and ponds will be retained and enhanced where practicable. The natural regeneration of the aquatic and marginal vegetation from the soil seedbed is the preferred approach for the reinstatement of the Ghost ponds, but small swathes of embankment aquatic and marginal planting will also be introduced for additional enhancement. A 2m width buffer around the ghost pond shall be created,

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	nest and roost features (in preference to installing small bird/bat boxes). Soft landscaping plans should reflect the local character and use locally sourced plants. Consideration should also be given to enhancing important bat flight lines/foraging areas. The enhancement measures should be reflected in the Commitment Register. Ecological offset/buffer Welcome the buffers set out in Table 5.1. It is requested that it include buffers to protect: a. veteran trees, b. important bat flight lines, and c. identify dark corridors around important ecological features.		in which no seeding or vegetative planting not associated with the pond shall take place. Further details, including mitigation and enhancement measures, pertaining to Ghost ponds and ponds more widely, are provided in and secured through the **OLEMP [EN0110014/APP/7.4]**. **ES Volume 2, Appendix 7.10 - Preliminary Arboriculture Impact Assessment (AIA) [EN0110014/APP/6.2.7.10]** identifies the existing tree resource within and adjacent to the Order Limits. This includes the identification of veteran trees and ancient woodland, none of which are proposed to be removed as part of the Scheme. At this stage the veteranisation of trees is not proposed, however nesting / roosting bird species will benefit from new landscape planting and through the retention of existing trees and protection of veteran trees. New vegetation planting will use locally sourced seed. Existing trees and woodland will be reassessed prior to construction, and this will help inform the measures in the LEMP, secured by Requirement 7 of the **draft DCO [EN0110014/APP/3.1]**. Trees will then be assessed every 5 years following by an arboricultural specialist, to identify any required pruning or maintenance which will be carried out as necessary, as secured through the **OLEMP [EN0110014/APP/7.4]**. Due to the presence of nationally important bat assemblages, the Scheme's design process has sought to embed avoidance and protection measures for foraging/commuting bat species, in order to enable bat species to continue to utilise habitats within the Order Limits throughout the construction phase. The Scheme design has sought to retain the large majority of existing hedgerow systems throughout the Order Limits. Also, the implementation of extensive 10m buffer zones surrounding field boundary hedgerows and ditches (extending to a minimum of 15m surrounding hedgerow trees and woodland) which will conserve field margin habitats which constitute key movement corridors along which foraging and commuting bats traverse the Order Limits. Ecological buffers applied to the design of the Scheme are provided within the **Design Principles, Parameters and Commitments [EN011014/APP/7.18]** retained habitat protection measures are committed to via the **Outline CEMP [EN0110014/APP /7.12]**.
Ecology and biodiversity	With regards to Table 8.1 (PINS ID 3.15.10) the LPA does not raise any concerns about scoping out reptiles, widespread amphibians, hazel dormice and	No	The Applicant welcomes the agreement to the matters scoped out of EIA assessment.

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	from the EIA as significant effects are unlikely to occur due to the habitats impacted. Also, hazel dormice are not present in South Norfolk. Precautionary method of working would be sufficient to ensure these species are not harmed.		In relation to the precautionary methods of working, the Applicant refers to **ES Volume 1, Appendix 8.10: Outline Protected Species Mitigation Strategy [EN0110014/APP/6.3.8.10]**, which provides specific mitigation / avoidance approaches, including the installation of temporary Biodiversity Protection Fencing (BPF) at the onset of the construction and the appointment of an ECoW. The Scheme will maintain appropriate ecological buffer zones, including 10m from hedgerows, ditches, and watercourses; 15m from individual trees, groups of trees, and non-ancient woodland; and a minimum of 30m from ancient woodland, ponds with a negative great crested newt (GCN) survey result, Sites of Special Scientific Interest (SSSI) boundaries, County Wildlife Sites (CWS), and badger setts. A 50m buffer will be applied to ponds with confirmed great crested newt presence, or where their presence is assumed due to inconclusive results or lack of survey access. Additional bespoke buffers will be established on a case-by-case basis around RNRs, bat roosts, and the nesting sites of Schedule 1 birds, taking into account the specific ecological requirements of the species involved.
Cumulative and in-combination effects	Regarding cumulative effects (page 31) details are emerging for the 700 MW Tasway Energy Park (https://taswayenergypark.co.uk/) to the west of Long Stratton. They are planning to start the consultation process this autumn/winter. It would be useful if a plan showing the areas that were not accessible to the surveyors could be made available as part of the examination to help visualise the unknowns (Para 8.3.8).	No	**ES Volume 2, Figure 2.1 - Cumulative Developments [EN0110014/APP/6.2.2.1]** presents the cumulative schemes within a 25km radius of the Scheme. Tasway Energy Park has been placed on indefinite hold so has not been included in the assessments.
Ecology and biodiversity	New CWS are designated annually by the CWS partnership so it would be advisable to update the desktop survey at intervals to consider ensure any new CWS/RNRs are identified early and considered (Para 8.3.9).	No	Updated data was purchased in January 2026, with the most up-to-date CWS data provided within **ES Volume 3, Appendix 8 - Ecological Desk Study and Extended Habitat Survey [EN0110014/APP/6.3.8.1].**
Ecology and biodiversity	The assessment should include consideration of whether the scale of the proposals, with large areas of solar arrays, and noise (e.g. from inverters), could have a discouraging impact on the movement and	Yes	An assessment of impacts upon barbastelle bat maternity colonies is provided within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8].**

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	foraging of bat species (especially Barbastelle bats from the maternity colony).		Impacts upon off-site bat roosts and trees with bat roosting potential within the Order Limits will be avoided during the construction phase through the avoidance and buffering of off-Site woodland habitats and specific stand-off distances from surrounding buildings. The following embedded off-site habitat avoidance measures have been included within the **Design Principles, Parameters and Commitments document [EN0110014/APP/7.18]** to avoid impacts upon roosting bat species surrounding the Order Limits: • A minimum of 30m construction exclusion zones surrounding existing SSSI Ancient Woodland, and CWS woodland parcels (some containing known bat roosts); • Minimum exclusion zones surrounding woodland parcels; and • RPZ's associated with retained mature trees. The **OLEMP [EN0110014/APP/7.4]** provides long term management guidance which will ensure the sensitive management of habitats potentially used by roosting bats (including created woodland parcels which may eventually offer roosting potential within the Scheme's lifespan) and includes the enhancement and management of buffer habitats surrounding known bat roosts sites (including Saxlingham Grove which supports barbastelle maternity roosts and extensive areas within sub-Site 4B which is located in close proximity to off-Site roosts). Further information is presented in **ES Volume 3, Appendix 8.5 - Ground Level Tree Assessment Report [EN0110014/APP/6.3.8.5]**. This achieves long-term habitat enhancement delivery for bats. The **OLEMP [EN0110014/APP/7.4]** also sets out the methods by which operational activities (most notably panel/battery replacement works) will be managed to avoid, minimise and mitigate any adverse ecological effects. It will ensure that there will be no pathway for significant direct or indirect effects upon roosting bats and associated important habitats. The **OLEMP [EN0110014/APP/7.4]** also provides commitment to the provision and maintenance of a variety of artificial bat roosting boxes throughout the Order Limits for the entirety of the Scheme's operational period. When considering the protection measures provided within the **OLEMP [EN0110014/APP/7.4]**, retention/protection of existing roosting opportunities, and the

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			provision of enhancements for the benefit of roosting bats detailed within the **OLEMP [EN0110014/APP/7.4]**, it is considered that the operational phase of the Scheme would result in a magnitude of impact of moderate beneficial, resulting in a long-term positive effect, which is considered significant at local scale. No additional mitigation measures are considered necessary, and no residual adverse effects are anticipated.
Ecology and biodiversity	Biodiversity Net Gain We welcome East Pye's commitment to delivering at least a 10% Biodiversity Net Gain (Chapter 8, paras 8.3.18 – 8.3.19) which should be secured as part of the DCO. Can it be confirmed if a minimum of 10% BNG will be delivered across all land within the DCO corridor (including the cable corridors). The commitment should be included within the Commitments Register. For ease: a. Because the BNG metric will be a large document could the onsite habitat baseline be broken down by site/sub-site to make it easier to understand? b. Can separate baseline maps be provided (perhaps as part of a BNG Statement (or similar)), with reference clearly made to them on the 'start tab' of the metric. Can the baseline maps also include the areas/lengths for each parcel. c. Condition assessments should be provided in their Excel format and clearly linked to each sub-site. d. Please identify, as far as possible, what habitats will be created post development, and e. Save the metric in its entirety (rather than unused tabs)	No	The advice provided here has been incorporated within the provision of the **Biodiversity Net Gain Report [EN0110014/APP/7.23]** and the Scheme's **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24]** which details all habitat impacts. Mitigation measures in relation to habitat enhancements are secured within the **Outline Landscape and Ecology Management Plan [EN0110014/APP/7.4].** The **draft DCO [EN0110014/APP/3.1]** includes a Requirement that a Biodiversity Net Gain (BNG) Strategy will be prepared, to be substantially in accordance with the oLEMP and to provide detail of how the BNG will be secured and how the Scheme will achieve a minimum of 10% net gain for habitats, hedgerows and watercourses. The BNG Assessment, as detailed in the **Biodiversity Net Gain Report [EN0110014/APP/7.23]**, has identified that the Scheme (inclusive of the Solar PV Sites, the CRC and Highway Improvement Area), based on the baseline habitat surveys, Hedgerow Removals Plan and Green Infrastructure Strategy and assumptions describe in the BNG Report, is able to deliver the following predicted change of biodiversity units: • 37.42% gain for habitats; • 31.35% gain for hedgerows; and • 16.08% gain for watercourses. On the basis of the above, the Scheme can achieve not only a measurable biodiversity net gain as considered favourable for DCOs, but also at least 10% biodiversity net gain for Habitat, Hedgerow and Watercourses units through a combination of on-site habitat retention, habitat enhancement and habitat creation. **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24]** is presented as a part of this Application, although this is not broken down by Sites and Sub-Sites. Off-Site

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			and On-Site baseline maps are provided as part of this document in the start tab and the metric will be saved in its entirety.
Ecology and biodiversity	Where the CRC crosses watercourses water vole surveys are advised because in the event of a multiple bentonite breakouts into the watercourse an alternative crossing point may need to be identified (Table 8.9).	No	Water vole surveys were undertaken (with negative results), see **ES Volume 3, Appendix 8.8Water Vole and Otter Survey Report [EN0110014/APP/6.3.8.8].** Precautionary mitigation/avoidance measures are provided within **ES Volume 3, Appendix 8.8 Outline Protected Species Mitigation Strategy [EN0110014/APP/6.3.8.10].** In the event that water vole burrows/latrines, or otter holts/resting places are found, the Ecological Clerk of Works (ECoW) will discuss this with the Site Manager(s) and efforts to alter the location of the clearance to avoid direct impacts will be made in the first instance. The Site Manager(s) will be responsible for liaising with the ECoW to agree timings and locations of HDD operations to ensure attendance at each event and ensure that the ECoW has undertaken a pre-commencement check for protected species (such as water vole and otter).No otter and water vole field signs have been recorded within the Order Limits during the 2025 field surveys, and therefore both species are currently considered to be not present within the Scheme (see **ES Volume 3, Appendix 8.8 Water Vole and Otter Survey Report [EN0110014/APP/6.3.8.8**]). Therefore, disturbance and impacts are considered to be unlikely. Adopting a precautionary principle, particular attention will be paid to any habitat removal works affecting or within 30m of a watercourse for the potential presence of otters and water voles. All applicable habitat removal works will be preceded by an inspection of habitat at least 50m upstream and 50m downstream of the clearance extent to look for signs of these species and their sheltering sites. The inspection will be carried out one month in advance of works commencing by a suitably qualified ecologist. Further information, including the mitigation measures referenced above, can be found in **ES Volume 3, Appendix 8.10 Outline Protected Species Mitigation Strategy [EN0110014/APP/6.3.8.10].**
Ecology and biodiversity	Ancient Woodland In line with Natural England's Standing Advice, we would suggest the 30m buffers	Yes	**ES Volume 3 Appendix 7.10: Preliminary Arboriculture Impact Assessment (AIA) [EN0110014/APP/6.2.7.11]** identifies the existing ancient woodland adjacent to the

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EB_1	provided around the ancient woodland (Chapter 5, table 5.1) are considered as part of the wider ecological network (connecting ancient woodland/priority habitat and veteran trees) and planted with semi-natural habitats such as woodland and a mix of grassland and scrub. These habitats should be retained post decommissioning.		Order Limits. No Ancient Woodland is proposed to be removed as part of the Scheme. **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]** details specific offsets/buffers from Ancient Woodland embedded into the design; this has been increased to a minimum of 30m as secured in the OLEMP [EN0110014/APP/7.4]. Habitat creations are proposed within the buffer zone as per NE's standing advice. This is detailed within the **OLEMP [EN0110014/7.4]**, a detailed version of which will be secured via a Requirement of the DCO. Post-decommissioning, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is anticipated that some areas of habitat and biodiversity mitigation and enhancement (woodland, trees, hedgerows, scrub) within the Sites may be left in-situ given they could contain protected species and so relevant licences at the time would need to be obtained for any changes.
Ecology and biodiversity	Embedded Mitigation Para 8.6.1 quotes the ecological mitigation hierarchy noting it also applies to BNG. The Biodiversity Gain Hierarchy (set out in legislation) is however subtly different to the ecological mitigation hierarchy so this should be reflected within Chapter 8. The application should therefore also consider how existing habitats can be enhanced. Para 8.7.202 notes 'linear terrestrial, riparian and aquatic habitats that will remain within the Site post-decommissioning'. For clarity can the application (perhaps in the form of a Biodiversity Net Gain Statement), clearly show which habitats will be retained post decommissioning.	No	The advice provided here has been incorporated within the provision of the **Biodiversity Net Gain Report [EN0110014/APP/7.23]** and the Scheme's **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24]** which details all habitat impacts. The habitat enhancement and creation methodology is secured within the **Outline Landscape and Ecology Management Plan (OLEMP) [EN0110014/7.4]**, a detailed version of which will be secured via a Requirement of the DCO. As outlined in the response directly above, Post-decommissioning, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is anticipated that some areas of habitat and biodiversity mitigation and enhancement (woodland, trees, hedgerows, scrub) within the Sites may be left in-situ given they could contain protected species and so relevant licences at the time would need to be obtained for any changes.
Ecology and biodiversity	Appendix 5.1 Draft Design Principles 2.1-2.12 relates to an environmental led design approach which includes ecological considerations, and 3.1-3.5 relate		As detailed in the **OLEMP [EN0110014/APP/7.4]** There are 7 ghost ponds identified for restoration across the Scheme. These are located within Subsite 3 within the northern field boundary; to the south east of Subsite 5A within field boundary; at the field

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	to BNG and Nature recovery – it would be desirable to include restoration of ponds/ghost ponds. It should also reflect commitments in the Commitment Register (including the ecological buffers. For example in sub site 7c there is potential to restore two ghost ponds		boundaries between Subsite 7D and 7F and to the northeast of Subsite 8A. Ghost ponds will be restored to their original size and depth. This will be undertaken in late summer to early winter, in dry, favourable weather conditions to minimise soil disturbance and poaching. A detailed LEMP is secured via Requirement 7 of the d**raft DCO [EN0110014/APP/3.1].** **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]** details specific offsets/buffers embedded into the design. Enhancements of habitats are detailed within the **OLEMP [EN0110014/7.4]**, a detailed version of which will be secured via a Requirement of the DCO. Ecological buffers are outlined in the **Design Principles, Parameters and Commitments** document **[EN0110014/APP/7.18]**.
Reasonable alternatives and design evolution	5.2.10 – Solar PV Panels - Percussive piles are not acceptable as a form of fixing and screw piles should be advanced as the preferred means of fixing. 5.2.53 – Motion sensing lighting - It is recommended that the lighting is not motion sensing but is an actively controlled one which will be used by security who monitor the site via infrared CCTV.	No	The specific piling methodology will be informed by relevant surveys and assessment, including ground conditions and archaeological surveys. Unless specified otherwise, the lighting for the Scheme will be controlled by motion sensors to support security, with a manual override function provided for maintenance. Once the Scheme is operational it is expected to operate unmanned and remain unlit under normal conditions, with all external lighting switched off. Lighting will only be activated during scheduled maintenance, in emergency situations or for security purposes. This is detailed further in **ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11]**.
Decommissioning and construction	5.5.5 – Construction activities - The councils recommended working hours are 08:00 – 18:00 Monday to Friday, 08:00 – 13:00 on Saturdays, No work on Sundays or Bank Holidays	Yes	The core construction working hours (not including start-up and shut-down works) are defined in the **Outline Construction Environmental Management Plan [EN0110014/APP/7.1]** as: • Monday to Friday from 07:00 to 18:00 (daylight hours permitting) • Saturday from 08:00 to 13:30 (daylight hours permitting); and • No Sunday or Bank Holiday working unless crucial to construction (for example, for HDD which must be continuous activity) or in an emergency. Where practicable, construction deliveries would be coordinated to avoid HGV movements during the traditional peak morning (08:00 to 09:00) and peak afternoon (17:00 to 18:00) hours.

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			Some activities may be required outside of these times such as the delivery of abnormal loads, concrete pours for foundations, night working for cable construction works in public highways and/or HDD activities. Further information can be found in the **OCEMP [EN0110014/APP/7.1]** and the **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]**.
Decommissioning and construction	5.5.31 – Decommissioning Management - it is uncertain why the ODEMP is to be produced as processes will significantly change over the 60year life cycle of the solar farm. This would probably be better secured via a Requirement.	No	An **Outline Decommissioning Environmental Management Plan (ODEMP) [EN0110014/APP/7.3]** has been prepared and submitted with the Development Consent Order (DCO) Application. This sets out the general principles to be followed in the decommissioning phase of the Scheme. The **draft DCO [EN0110013/APP/3.1]** includes a requirement that a detailed Decommissioning Environmental Management Plan would be prepared substantially in accordance with the **ODEMP [EN0110014/APP/7.3]** and approved by the relevant authorities at the time of decommissioning, in advance of the commencement of decommissioning works and would including timescales and transportation methods. The detailed Decommissioning Strategy will ensure that decommissioning is undertaken safely with regard to the environmental legislation at the time of decommissioning, including relevant waste legislation.
Noise and vibration	12.2.2 – Noise – Solar PV Tracking Motors (Operational Phase Only): Given the number of panels which will be operating at the same time. Even if this has been scoped out, it should be included in the overall noise assessment. Noise – Maintenance and Replacement of 132Kv and 400Kv Substations, National Grid Substation, BESS, Solar PV Arrays: No objection to the scoping out of the maintenance aspect. However, any replacement of plant should be agreed with the LA and be supported by evidence that their noise levels are the same of lower than the those initially installed. This should be included in the report.	Yes	Due to the scale of the scheme, it is not considered proportionate to model all tracking motors across the scheme. Therefore, an example sample has been provided at a worst-case location to demonstrate that the cumulative effects of both tracking motors and the typical operation of the scheme are negligible. The assessment is presented in **ES Volume 1, Chapter 12: Noise and Vibration [EN01100141/APP/6.1.12]**. Panel replacement may occur sporadically throughout the lifecycle of the Scheme. It is anticipated that all the panels will be replaced at least once, and the BESS may be replaced up to four times throughout the lifecycle of the Scheme. The activities involved in the maintenance of plant and replacement of the panels and BESS will comprise less intense activities compared to the construction period, which has already been considered and therefore does not require further assessment. Further information can be found in the **OCEMP [EN0110014/APP/7.3]**.

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Noise and vibration	Table 12.4 - Site 5 & 400Kv Substation: NSR29 and NSR30 are defined as having a medium sensitivity. This is understood as they are classed as a commercial enterprise. However, as a nursery the occupants are considered to have a high sensitivity. As such they should be considered to have a high sensitivity	Yes	NSR30 has been uprated to a high sensitivity and assessed in **ES Volume 1 Chapter 12 -Noise and Vibration [EN01100141/APP/6.1.12].**
Noise and vibration	12.2.13 – Clarification of what are the hours outside of which a S61 would be applied for? 12.2.14 – There is no indication of whether alternative accommodation will be offered and at what threshold this will happen.	Yes	Details included in embedded mitigation section within the **ES Volume 1, Chapter 12 - Noise and Vibration [EN01100141/APP/6.1.12].** Guidance contained within BS 5228-1:2009+A1:2014 is used to determine thresholds for alternative accommodation due to construction noise.
Noise and vibration	12.2.23 – Operational noise should be at background or below. 5dB is considered to be LOAEL and is not considered to be acceptable. 12.2.25 – Is this the noise levels at the facia? The Nursery should be considered to be high sensitivity due to the sensitivity of the occupants even if it is a commercial premises.	Yes	Introduction of NOAEL has been included in accordance with Professional Planning Guidance in the **ES Volume 1, Chapter 12 - Noise and Vibration [EN01100141/APP/6.1.12].** Additional example mitigation has been included with the aim to reduce operational noise to below background sound levels which would ensure that the NOAEL is not exceeded with the exception of areas surrounding the BESS and Customer substation which are subject to slightly higher predicted rating levels whilst remaining below the LOAEL. Nurseries have been included as high sensitivity and an assessment of educational facilities has been included. Compliance with NPS is achieved by avoiding significant adverse effects (i.e. effects are to be below the SOAEL), and adverse effects should be mitigated and reduced to a minimum (i.e. effects at or below the LOAEL should be targeted where practicable). The assessment is in-line with this approach, and seeks to achieve the NOAEL where possible.
Noise and vibration	12.2.31 – It is recommended that the noise assessment is undertaken for both sites. This can guide the site selection, such that the least impact from operation noise is achieved and the least amount of mitigation is required. 12.2.34 – The councils recommended working hours for noisy works are 08:00 – 18:00 Monday to Friday, 08:00 –	Yes	Noise impacts have been considered during the site selection process. It is industry standard is to assess construction noise using guidance provided within BS 5228-1. No precedents are known to the Applicant where BS 4142 has been used to assess construction related noise using BS 4142. BS 4142 explicitly does not cover construction and demolition noise.

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	13:00 on Saturdays, No work on Sundays or Bank Holidays. Work outside this will require a S61 agreement, this should be stated in the report. 12.2.35 – Where construction compounds are proposed to be present, these should be assessed using BS4142 as, due to their operational time the noise impact could be considered to be that of a fixed installation.		The core construction working hours for the Scheme have been defined as: Monday to Friday from 07:00 to 18:00 (daylight hours permitting); Saturday from 08:00 to 13:30 (daylight hours permitting); and no Sunday or Bank Holiday working unless crucial to construction (for example, for trenchless crossings which must be continuous activity and the arrival and departures of workers and the delivery of AIL) or in an emergency. This is outlined further in the O**CEMP [EN0110014/APP/7.1]**. The assessment of construction noise is presented in **ES Volume 1, Chapter 12- Noise and Vibration [EN01100141/APP/6.1.12]**.
Noise and vibration	12.6.3 – Percussive piling is not considered to be appropriate, and other types of piling (e.g. Screw piles) should be considered as this will remove the percussive noise impact.	No	To consider the worst-case, an assessment of percussive piling has been included in **ES Volume 1, Chapter 12 - Noise and Vibration [EN01100141/APP/6.1.12]**, within the construction assessment. The results indicate that BS 5228 significance criterion is not exceeded, even at the worst-case receptors and therefore the SOAEL will not be exceeded.
Noise and vibration	12.6.19 – Details of the proposed mitigation measures are required. Mitigation measures should be expanded to cover all NSRs where the predicted noise levels exceed the background noise level. 12.6.20 – Significant details and consideration of the mitigation measures proposed for the BESS and Sub-stations as these could pose a significant impediment to the development. 12.6.23 – A Major Adverse effect would not be acceptable. This needs to be clarified prior to the submission of the DCO or we would have to object to the application due to the impact on the amenity of the residents.	Yes	Example mitigation has been provided within **ES Volume 1, Chapter 12- Noise and Vibration [EN01100141/APP/6.1.12]**, to reduce sound levels to below the NOAEL where practicable, and in most instances, with the exception of the BESS, where there are mitigation limits and therefore the results of the assessment indicate that the LOAEL will not be exceeded. This is in-line with the NPS requirements. As the assessment of effects for noise and vibration contained within the chapter show, a major adverse effect is not anticipated for this Scheme. Mitigation measures outlined are included within the **OOEMP [EN0110014/APP/7.2]**. In addition to this, the resultant noise levels at receptors will be required achieve the levels set out within the **OOEMP [EN0110014/APP/7.2]**.
Noise and vibration	12.6.25 – The outdoor amenity space of the NSRs should be assessed as part of the process. This is to include evening and weekends when it can be expected that the occupants will be in residence. This I more critical during summer months when the receptors are more likely to be outside and the solar farm and associated equipment are functioning at their highest noise level.	Yes	An assessment of sound levels at ground floor level has been provided in **ES Volume 1**, **Chapter 12- Noise and Vibration [EN01100141/APP/6.1.12]**, in a location representative of the outdoor amenity spaces during daytime hours. The environmental sound survey was measured over a typical weekday and weekend period, the results of the survey form part of the assessment and have therefore been considered.

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Decommissioning and construction	12.6.31 – 12.6.35 – the works to be undertaken during the decommissioning are not known at this time as and such any predictions are guesswork at best and the DCEMP should be provided nearer the time of decommissioning and be covered by a condition.		An **ODEMP [EN0110014]** accompanies the application. The detailed DEMP will be produced substantially in accordance with this Outline DEMP following the grant of the DCO and when the Scheme is due to be decommissioned. It will then be submitted to the relevant Local Planning Authority (LPA) for approval, in accordance with a Requirement of the **draft DCO [EN0110014/APP/3.1].**
Noise and vibration	12.7.3 – The mitigation should be down to background noise levels and not to LOAEL. 12.8.1 – This should be covered by a BS5228 assessment, and percussive piling should not be utilised, and an alternative should be proposed. 12.8.3 – The threshold should be the background noise level and should not be exceeded.	Yes	Mitigation measures outlined are included within the **OOEMP [EN0110014/APP/7.2]**. In addition to this, the resultant noise levels at receptors will be required achieve the levels set out within the **OOEMP [EN0110014/APP/7.2]**.**]**. An assessment of percussive piling has been included in the construction assessment. The results indicate that BS 5228 significance criterion is not exceeded, even at the worst-case receptors and therefore the SOAEL will not be exceeded. A statistical analysis of the background sound levels measured during the sound survey has been undertaken and forms the basis of the operational noise assessment.
Noise and vibration	Table 12.24 - Operational and Maintenance Phase - Operational Noise from 400kV Substations, National Grid Substation, Battery energy Storage, Solar PV Arrays – This should be classified as Unknown as at this time the details of the BESS and substation are not known.	Yes	Operational noise from the Scheme has been assessed and is presented in ES **Volume 1, Chapter 12 -Noise and Vibration [EN01100141/APP/6.1.12].**
Air quality	13.4.7 – This is incorrect. The Councils have a number of Earthsense Zephyrs positioned in the area. This data can be made available upon request.	Yes	This has been corrected and particulate matter data from the Earthsense Zephyrs are provided in **Table 13-7** of **ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13]**.
Air quality	Appendix 13.1 Construction Dust Risk Assessment All Paragraphs – PM2.5 should be included as a consideration throughout the Construction Dust Risk Assessment. 1.1.3 – This should include PM2.5 as well as PM10. 1.1.5 – This should include PM2.5 and should also discuss and consider the impact of the particulate matter including the existing background	Yes	$PM_{2.5}$ is considered throughout the construction dust risk assessment presented in **ES Volume 3, Appendix 13.1 Construction** and **Decommissioning Dust Risk Assessment [EN0110014/APP/6.3.13.1**]. The recommendation for real-time particulate matter (including $PM_{2.5}$) monitoring is noted. The technology selected for PM monitoring will take into account the IAQM's Position Statement on 'Use of Low-Cost Sensor Systems for PM_{10} in the Vicinity of Demolition and Construction Sites and Considerations of PAS 4023:2023'.

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	levels. Table 1.9 - Monitoring – Real time monitoring is recommended, which should include PM2.5		
Other environmental matters	Waste Management – Burning of waste is not acceptable form of waste operation and it should be clearly stated that it will not be undertaken.	Yes	Burning of waste onsite is not proposed by the Applicant and has been expressly prohibited through the control measures in the **OCTMP [EN0110014/APP/7.1]**. This is secured by a Requirement in Schedule 2 to the **Draft DCO [EN0110014/APP/3.1]**. All waste is to be handled by licensed waste carriers and treated in accordance with the waste hierarchy.
Other environmental matters	16.1.11 – Consultation should also be with SNDC as they are responsible for any contaminated land investigation under Part 2A of the EPA1990. Table 16.12 - Off-site 5) RAF Hardwick, should include PFAS as a potential contaminant. Appendix 16.1 2.5.17 It is considered that investigation of the airfields should be undertaken given the potential for contamination to exist. Sources could include FIDO as well as de-icers, and firefighting foam residue (PFAS). Table 5.2 - It is considered that the Hazard Classification Score is too low for potential sources of contamination which are present on site. Off site is acceptable due to the distance	Yes	As described in the Phase 1 Ground Conditions Assessment **[EN0110014/APP/6.3.13.1]** a Freedom of Information (FoI) Request was sent to South Norfolk and Broadland Council on 26/09/2024. This FoI request included a request for "*Land within 250m of the Site which has been classified as Contaminated Land (including ground investigated or designated under Part 2A) and any associated enforcement (e.g. remediation) and prohibition notices*". The response from the Council was received on 02/10/24 and confirmed that there is "*no land which has been formally determined as Contaminated Land as defined in Part 2A of the Environmental Protection Act 1990 (as amended)*". As described in **ES Volume 3, Appendix 13.1 Ground Conditions Assessment [EN0110014/APP/6.3.13.1]** whilst none of the sources of information reviewed indicate that a FIDO system was constructed at either of these airfields, petroleum hydrocarbons are retained as a potential contaminant of concern associated with the former airfields. It is noted that Site 3 is located only on the fringe of RAF Hardwick, at significant distance from areas of identified former fuel storage (nearest is approximately 570m to the south-east and is 280m (at most proximal) from the nearest runway. As described in **ES Volume 3, Appendix 13.1 Ground Conditions Assessment [EN0110014/APP/6.3.13.1]** by 1946, RAF Seething had closed and the majority of the airfield reverted to agricultural use, and in 1962 RAF Hardwick closed and the main airfield buildings and hangars were demolished. Whilst PFAS hazards associated with the historical airfields have not been eliminated, given that the airfields were either no longer in use, or were demolished before the introduction of PFAS-containing Aqueous Film Forming Foams (AFFFs), PFAS hazards associated with the airfields are considered unlikely.

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			Ground investigation will be undertaken post-consent, as described in the **OCTMP [EN0110014/APP/7.1]** to inform the detailed design of the Proposed Development and will include analysis for petroleum hydrocarbons, phenols, glycols and PFAS. The hazard classification for each SPC has been assigned in accordance with the methodology appended to **ES Volume 3, Appendix 13.1 Ground Conditions Assessment [EN0110014/APP/6.3.13.1**] The hazard classification of Low for the airfields are considered appropriate given that the parts of the airfield within the Order Limits comprised airfield fringes, but not the main airfield technical sites, fuel stores, etc. and the fact that any point-sources of contamination present are likely to have been spread out across a wider area by at least 50 years of agricultural use following the restoration of the former airfields to farmland. A hazard classification of Low denotes (as per the methodology appended to **ES Volume 3, Appendix 13.1 Ground Conditions Assessment [EN0110014/APP/6.3.13.1**]) the potential for "*locally slightly elevated concentrations*" of contamination to be present. It is not considered appropriate to raise this to 3 which denotes "*possible widespread slightly elevated concentrations and locally elevated concentrations*". Following further review SPC4 – Former Refuse Tip has been assigned a hazard classification of High. SPC3 – Market Lane Pit has been assigned a hazard classification of Low on the basis that the former pit is of a very limited size, does not appear to have been completely infilled, is not recorded by the EA as a landfill, and any limited infill is now >50 years old.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Other environmental matters	PEIR Chapter 17 Electromagnetic Fields ;The text associated with the figures all mention the drop off from underground cables, even when the figures relate to overhead cables. This needs to be clarified. A comparison of the changes between the 1998 ICNIRP and the 2010 ICNIRP should be included. This should include a direct comparison of the appropriate health criteria.	Yes	**ES Volume 1, Chapter 17 – Other Environmental Matters [EN0110014/APP/6.1.17]** states 'In 2010 ICNIRP produced new guidelines, but these have not yet been incorporated into UK Policy.' As such, the assessment had considered the thresholds as per the formally accepted thresholds. The 2010 study was focused on the frequency fields between 1Hz-100kHz. It should be noted that the thresholds are more conservative for the 1998 guidance compared to the 2010 guidance. No references to underground cables are made in the figures or discussion for overhead cables.
Glint and glare	18.4.14 – The number of residential receptors has not been provided.	Yes	**ES Volume 1, Chapter 17 – Other Environmental Matters [EN0110014/APP/6.1.17]** lists 482 identified residential receptors.
Glint and glare	18.4.65 – This section does not comply with what the Glint and glare assessment says. The G&G states that of the remaining 68 dwellings 46 will require mitigation.	Yes	ES Volume 1, Chapter 17 – Other Environmental Matters [EN0110014/APP/6.1.17] lists the following: • 482 dwelling receptors have been modelled and 482 receptors are geometrically possible for glint and glare. • 414 receptors are predicted to have no impact due to baseline conditions.For 22 dwellings a low impact is predicted due to baseline conditions and for 46 dwellings required mitigation and are mitigated by the landscape mitigation plan

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Glint and glare	Appendix 18.1 Glint and Glare Assessment The Glint and Glare assessment states that embedded mitigation measures are in place but does not discuss what they are. Additionally, if this is to comprise the planting of vegetation (hedges etc), how long will it take to the vegetation to grow sufficiently such that they do effectively block the predicted glare?	Yes	The mitigation consists primarily of proposed vegetation (i.e. hedgerows). The established heights are as follows: Scrub planting - up to 4m, Linear belts of shrub and tree planting – 4-8m, Woodland – up to 8m, New hedgerows – up to 3m. During the interim, it is understood that instant hedging will be adopted to reduce impacts until proposed mitigation is established. These measures are detailed in the **OLEMP [EN0110014/APP/74.]**, the LEMP (secured by Requirement 7 of the **draft DCO [EN0110014/APP/3.1])** will set out the roles and responsibilities of those involved in creating, managing and monitoring the prescriptions within this document.
Noise and vibration	Table 19.7 - Noise. It cannot be said that the cumulative operational noise will only be minor adverse and that it is not significant as the noise impact of the BESS and Sub-station have not been assessed.	Yes	The assessment of noise impact from the BESS and Substation have been assessed and are presented in **ES Volume 1, Chapter 12: Noise and Vibration [EN01100141/APP/6.1.12]**. This concludes that operational noise impacts from the proposed BESS, 132kV and 400kV Substations and National Grid Substation has been assessed as neglible to low and therefore not significant in nature. Mitigation measures such as acousting barriers (where appropriate), manufacturer-supplied noise mitigation and containerised/enclosed noise generating equipment (where appropriate), are outlined are included within the **OOEMP [EN0110014/APP/7.2]**. In addition to this, the resultant noise levels at receptors will be required achieve the levels set out within the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**.
BESS	Above are my conclusions on the information provided in the available documentation. However, I note the distinct lack of information relating to the proposed BESS and Sub-station. I also note the comments provided by the consultant, that state that the BESS and Sub-station may have a Major Adverse effect. Based on my experience I consider that the proposed BESS and substation could significantly impact amenity such that it would be a Statutory Nuisance. As such unless significant	No	The Applicant notes this. The Applicant will submit an **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]** which outlines the key fire safety provisions for the BESS proposed to be installed as part of the Scheme, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. The Applicant has also commissioned a Plume Study (**BESS Fire Emissions Modelling report [EN00110014/APP/7.5]**) which assesses the battery fire emission impact at six worst case BESS fire locations (using the illustrative BESS design) on sensitive receptors within a 1km radius of the BESS Compound.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	mitigation can be proposed I would have no choice but to object to the project.		The Plume Study demonstrated that there were no significant impacts on any sensitive residential receptor location with 1km of the BESS compound. A risk assessment of the potential impact on visibility has also been undertaken for nearby road and rail receptors. The predicted visibility distances in the event of a BESS fire are greater than safe stopping distances for roads and rail. The Applicant has also agreed at the detailed design stage to commission a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a BESS incident to sensitive receptors within a 1km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out). Production of particulate matter (PM) and a visibility impact assessment on transport links within a 1km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 4.4.4 of the OBSMP) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider. The ERP could contain the following measures or protocols relating to air quality for sensitive receptors located downwind from a fire plume. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally: Notification of potentially affected residents including advice on the health effects of smoke and ways to reduce exposure (e.g. close windows and stay indoors) in the event of a BESS fire. Should there be a BESS fire in close proximity to a Public Right of Way (PROW) or Bridleway, the site operator is to determine wind direction from the BESS area weather station and seek to close a PROW or Bridleway, if deemed necessary. Final BESS design and site layout will be validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and ESS units to prevent the fire from spreading. This strategy will be finalised in consultation with NFRS and be clearly communicated in the ERP: • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater runoff is contained and tested before release or, if necessary, removed by tanker and treated offsite. The implementation of the OBSMP is secured through a Requirement in Schedule 2 of the DCO. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency (EA) prior to the commencement of the works for the BESS. The BMSP will be substantially in accordance with the OBSMP
Noise and vibration	Please note that the noise levels which I consider to be appropriate for the proposal to be emitting would be at or below background noise levels (LA90), which should be applied to all noise sensitive receptors.		The assessment of noise impact from the BESS and Substation have been assessed and are presented in **ES Volume 1, Chapter 12 - Noise and Vibration [EN01100141/APP/6.1.12]**. Mitigation measures such as acousting barriers (where appropriate), manufacturer-supplied noise mitigation and containerised/enclosed noise generating equipment (where appropriate), are are included within the **OOEMP [EN0110014/APP/7.2]**. In addition to this, the resultant noise levels at receptors will be required achieve the levels set out within the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**.
Soils and agriculture	This loss of BMV land (given that food production is a vital part of our economy and nationally in terms of food security) raises concerns and whilst the Project lifetime is up to 60 years, therefore temporary and reversible, the loss of BMV should the Project be granted consent would be immediate and over a		Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024). It should also be noted that food security is not identified as an issue within the suite of Energy National

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	significant period of time. The Council also is concern regarding the cumulative impact other Projects for similarly large Solar NSIP's and TCPA proposals, could result in a significant loss of BMV land and the impact this would have on our District.		Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. The assessment of cumulative scheme is set out within the technical chapters of the (ES: Chapters 6 - 18 [EN0110014/APP/6.1.6 - 6.1.8]), with the full list of cumulative schemes assessed provided in ES: Appendix 2.4 Cumulative Schemes [EN0110014/APP/6.1.6 - 6.3.2.4] which sets out the approach to identifying cumulative schemes.
Socioeconomics	It is essential to South Norfolk that the economic benefits are maximised for the communities that are hosting the project which will have a significant impact on their environment. The PEIR advises that an Outline Skill, Supply Chain and Employment Plan will be prepared in consultation with relevant consultees, which is welcomed, and the Council would wish to have an input into this plan. It is noted that it is estimated that the construction phase of the project would support 258 workers per day, equivalent to 217 full time jobs and peak at 694 workers, equivalent to 583 full time jobs in month 6 of the construction programme. It suggests further 660 direct jobs, during construction. In total the project will support 1,006 net directly and indirectly, of those 73 are anticipated to be for people living in South Norfolk,181 elsewhere in Norfolk, 252 in the rest of the East of England and 501 outside the region. Whilst it is appreciated the construction	Yes	An **Outline Employment, Skills and Supply Chain Strategy (OESSCS) [EN0110014/APP7.10]** has been produced and submitted with the application which sets out a strategy for how local opportunities will be maximised. The implementation of the detailed ESSCS will be secured through a Requirement in the **draft Development Consent Order (draft DCO) [EN0110014/APP/3.1]** for the Scheme. **ES Volume 1, Chapter 16 - Socio-Economics [EN0110014/APP/6.1.14]** provides an updated assessment of estimated employment for the Scheme and effects on the temporary accommodation market. This Chapter concludes that the Scheme is considered to have a Minor Adverse effect on the temporary accommodation market in South Norfolk during the construction phase. 26 of the 47 cumulative schemes are anticipated to support an operational workforce through the delivery of employment land and / or employment supporting uses. Similar to the Scheme, operational employment supported by the 23 cumulative energy schemes is anticipated to be limited. Given the number of cumulative schemes that will be supporting operational employment, with some of these incorporating large

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	period is temporary and the benefits of the provision of jobs, an area of concern for the Council however is the need for temporary accommodation, given 50% of the scheme's construction workforce is likely to be sourced outside of the region and particularly when taken into consideration the other NSIP Projects consented and being built out: RWE Vanguard and Boreas (cable routes and Convertors stations); Hornsea Project Three (cable routes and convertor station) and Equinor (cable routes and convertor station); 3 National Highway Schemes and the NSIP projects coming forward such Norwich To Tilbury and other potential Solar Farms. It is therefore considered that a full assessment will need to be undertaken as part of the EIA, to assess the wider impacts arising from the proposed project, in combination with other NSIP developments.		employment sites, it is considered that there is the potential for at least a Moderate Beneficial (Significant in EIA terms) cumulative effect on jobs, employment and supply chain in South Norfolk during the operational phase.
Socioeconomics	South Norfolk with its Market Towns of Diss, Harleston, Loddon and Wymondham; numerous Heritage assets including Saxon and Norman Churches; the Waveney Valley; Boudicca Way; museums; walking and cycling routes: venues and accommodation for example, provides a rich tourism/visitor offer. In reviewing the documentation, it is not considered that East Pye have fully assessed the impacts that the project would have on the known features, directly and indirectly and not in combination with the other NSIP's and developments as set out in the above paragraph.	Yes	**ES Volume 1, Chapter 16 - Socio-Economics [EN0110014 /APP/6.1.14]** considers the effects of the Scheme (and cumulatively in combination with other identified developments) on tourism. Effects on PRoW are considered in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**. Collectively, the 23 energy cumulative schemes in combination with the Scheme have the potential to effect visual amenity of the area which may impact tourism. Such effects are considered in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7].** However, visual effects would be greater closer to the Order Limits, diminishing with distance, and therefore only tourism related activities within immediate proximity to the sites have the potential to be adversely impacted. As such, it is considered that there will be a Minor Adverse cumulative effect on the tourism industry in South Norfolk during the operational phase.
Community benefits and impact	It is considered that East Pye should commit to providing a package of community benefits, to seek localised benefits to South Norfolk communities to offset the significant impacts the project will create.	No	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in the National Priority Statements

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	The Council would welcome further discussions with East Pye Grid regarding an appropriate community benefit package.		for Energy NPS-EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with the local authorities, including South Norfolk Council, local parish councils and any community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds. The Applicant is happy to engage proactively with South Norfolk Council on the extent and formation of a community benefits package.

2 Section 42 Applicant Response Table – Targeted Consultation

2.1 Anglian Water

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and Access	2. B1134 Station Road between Prangle Lane and Lodge Road, including field to the North of B1134 2 Station Road. Anglian Water assets affected by area defined for widening of the highway. Sewer along part of Station Road to Lodge Road, and water main on corner of Station Road/Lodge Road - located in the road/roadside verge. 3. B1134 Station Road between Green Lane and the BESS Site. Anglian Water assets affected by area defined for removal of street furniture and vegetation. Sewer and water mains within this section of Station Road which may lie within road verges. 7. A140 Norwich Road, South of Wood Lane. There is an Anglian Water asset (water main) to the west of the A140 at this location which may be impacted by potential vegetation removal along the highway. 8. Hall Lane and Hall Lane / Ipswich Road Junction. There are Anglian Water sewers and water mains at the junction of Ipswich Road and Hall Lane which may be impacted through vegetation/soil removal to allow abnormal loads to make turning movements.	No	The Applicant is grateful to Anglian Water for indicating the likely location of its assets in relation to the Order Limits. Post Grant, the Principal Contractor and its sub-contractors commissioned to undertake the Approved Development will carry out the necessary due diligence on statutory undertakers equipment at the time of preparing and agreeing the detailed designs of the cable routeing, bellmouth construction, haul route construction and alterations to roads. That will include issuing notices to Statutory Undertakers and carrying out Ground Penetrating Radar surveys as necessary – both within the Highway and outside the limits to Highway. Reflecting the specific requirements of Anglian Water and other Statutory Undertakers, the below ground and above ground equipment information will be used to inform the precise location of the cabling to avoid conflict and interference with existing Undertakers' equipment. If required further mitigation will be used, such as localised hand-digging or vacuum excavation. The O**CTMP [EN0110014/APP/7.6]** and the final CTMP secured by DCO Requirement will specify the requirements to engage with Statutory Undertakers, including Anglian Water, as part of the planning for Authorised Development works.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	11. B1527 Bungay Road. Anglian Water main within the extended area of Site 5A - located on the edge of the highway and may be impacted by vegetation removal to accommodate vehicles accessing the site. 12. A140 Hempnall Roundabout. Anglian Water has water mains within the area of localised change which may be impacted by vegetation removal along the highway. 13. Fairstead Lane and Junction with A140 Tasburgh Hill / Ipswich Road. Anglian Water has a sewer within the area of localised change which may be impacted by vegetation removal along the highway - Fairstead Lane. The area of localised change also appears to include land within our ownership that contains our Tasburgh Fairstead Lane Terminal Pumping Station. Anglian Water would seek further engagement on any works, or any proposed acquisition of rights, that may directly or indirectly impact on the operation of our asset. 15. B1527 Bungay Road / The Krons / The Street Junction. There is a water main along Bungay Road with may be impacted by vegetation removal for access if located within the roadside verge. 17. Church Lane / Broaden Lane between Plummer's Lane and The Green. There is a water main, gravity sewer and pumped rising main (sewer) within the area of localised change (along The Green), which may be impacted by		

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	vegetation removal along the highway to allow for abnormal load vehicles to turn. 18. The Street / Church Hill, Saxlingham Nethergate. There are sewers and water mains within the area of localised change along Church Hill and The Street, which may be impacted by vegetation removal to allow for abnormal load vehicles to turn. 19. Alburgh Road, South of Back Lane and North of Hempnall Green. There is a water main located in this area of Alburgh Road, located on the edge of the highway and may be impacted by vegetation removal to accommodate vehicles accessing the site. It is noted that the measures proposed to accommodate Abnormal Indivisible Loads (AIL) such as the widening of highways and removal of vegetation may reduce the soil cover to Anglian Water pipes (water mains and sewers identified in the table above). We agree that temporary road surfaces or providing protective plates should help mitigate the potential effects of abnormal loads traversing on land above our assets but would seek to ensure the Applicant agrees such measures in advance of construction, and in accordance with our Protective Provisions.		
Consultation and engagement	Anglian Water has previously recommended that further advice should be sought from us on the asset interfaces of the Project – this advice can include: • Clash detection and resolution • Early design and technical assurance • Asset protection	No	Anglian Water has been consulted at phases of consultation including a round of statutory consultation in June 2025. The Applicant will continue to engage with Anglian Water on the points raised, including any implications for Anglian Water assets.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	and diversion planning • Review of red line boundary implications		
General	Whilst, costs would be incurred to support project development and internal planning, this can be discussed further with the Project Promoter. This would provide a high-level desktop assessment of each interface between the Project and Anglian Water assets or projects, and will be dependent on project size, complexity and requirement from the Project. Typically, this includes input from both Anglian Water Services and our delivery teams. This process will also help to inform mitigation measures in the outline Construction and Environment Management Plan (oCEMP) to be included in the Environmental Statement. The Programme document outlines the targeted engagement of statutory consultees including relevant statutory undertakers (para 4.1.2) – therefore, Anglian Water would seek further direct engagement with the East Pye Solar Project Team and preparation of a Statement of Common Ground to address matters raised throughout the pre-application period, to ensure these are appropriately addressed in the draft DCO.	No	The Applicant welcomes further engagement with Anglian Water and intends to consult continuously on any issues that may arise and work towards a Statement of Common Ground.

2.2 Forestry Commission

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Landscape and Visual	We note that several of the changes mention vegetation removal, however it is unclear if this will include the removal of trees and if so, what compensatory planting there may be.	No	Trees and hedgerows removed to facilitate construction, and the cable route will be reinstated. However, there will be some residual loss that cannot be compensated, in order to provide access to the Sites. Details of landscape mitigation is presented in **OLEMP Appendix 2 Figure 2 Green Infrastructure Strategy [EN0110014/APP/7.4]**.

2.3 Hempnall Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Consultation and Engagement	The changes to the scheme as described in the targeted consultation are considerable. The increased size of the National Grid sub-station from 132kv to 400kv with the building increasing in height from 7m to 13m together with a change in the location of this sub-station, are a radical departure from the plans as described in the statutory consultation. These alterations on their own should have triggered the necessity to re-run the statutory consultation. Furthermore, the additional areas of land that are included to enable HGVs and abnormal loads to access the site would cause significant environmental damage and their inclusion alters the boundaries of the site. Consideration of the implications of these involved tortuous access plans should be	No	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the PA2008, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The additional areas consulted as part of the Targeted Consultation and their associated activities, including their nature, extent and duration, have been reviewed as part of the environmental assessment. The additional areas do not change the likely significant effects of the environmental impact assessment that are set out in the Environmental Statement. Information in relation to construction traffic routes, including AILs, has been addressed in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11].** To facilitate these changes, pruning may be undertaken on existing vegetation; protection measures for existing vegetation during construction are set out in the **OCEMP [EN0110014/APP/7.1]**. Hedgerow

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	dealt with as part of a statutory consultation and not be introduced via a targeted consultation. What's more, the expansion of solar infrastructure on site 7D towards the conservation area of Saxlingham Green should form part of a new statutory consultation.		losses are shown in Appendix A of the **OLEMP [EN0110014/APP/7.4]**, and tree losses are detailed in **ES Appendix 7.10 - Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10].** The Applicant's Phase Two consultation (which was statutory under section 47 of the PA2008) was carried out in line with the commitments and principles established in the Applicant's published Statement of Community Consultation (SoCC). As required by s47 of the PA2008, the Applicant consulted with South Norfolk Council and Norfolk County Council on a draft of the SoCC and had due regard to their comments in updating the SoCC for publication ahead of commencing statutory consultation. Chapter 6 (Preparation for Statutory Section 47 Consultation) of the **Consultation Report [EN0110014/APP.5.1]** describes the process of preparing the SoCC, including the Applicant's consideration of comments received by South Norfolk Council and Norfolk County Council (Table 6-1, Table 6-2 and Table 6-3) and adherence to commitments made in the published SoCC (Table 6-5). The EIA is an ongoing process. The ES has had regard to comments received through the statutory consultation and targeted consultation, to inform the design of the Scheme, where possible. The findings of the EIA are presented in the ES chapters, and a summary of the main design changes to the Scheme can be found in **ES Volume 1, Chapter 4 - Alternatives and Design Evolution [EN0110014/APP.6.1.4]**. The ES was undertaken in accordance with the EIA Regulations and was based upon the Scoping Opinion. On this basis, a second statutory consultation will not be undertaken.
Consultation and Engagement	The opening map entitled *Indicative Master Plan for Targeted Consultation Overview Sheet*, has a legend that is unreadable in the normal display size on a typical desktop computer. Furthermore, the colours used in the legend do not in all instances clearly match the colours on the map, for example the cable route corridors are shown in the legend as a deep pink whereas on the map the shading is much	No	The Applicant notes that some respondents may have been challenged in reading the maps available – every effort was made to ensure this information was clear and the Applicant is confident that the opportunity for clarification was made available to all interested parties. The Applicant also notes that materials were available in hard copy or accessible formats upon request.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	lighter. This failure to produce a clear legend and map is confusing to the user. At normal display size the map is unclear and indistinct and when you zoom in it becomes pixelated. The second map entitled *Indicative Master Plan for Targeted Consultation sheet 1* has a very confusing legend and again the colours on the legend do not conform to the colours on the map and the diagonal shading is difficult to interpret. Furthermore, the land identified to the south and southwest of site 1, which according to the legend will be an area subject to overhead line works associated with the National Grid sub-station is on land that is already part of another company's solar farm which has already received planning permission (SNC planning ref 2024/3817). The third map entitled *Indicative Master Plan for Targeted Consultation sheet 2* is once again a poor quality map. For example, the horizontal pink or red lines which are meant to show the extent of the Saxlingham Green conservation area are virtually invisible on the map. On these first three maps there is a rectangle below the legend in which the overall site area is displayed in a very unclear fashion by splurgy red lines. The first map which has the title *PEIR site boundary with additional areas (index sheet)* has an incomplete legend which does not offer an explanation of the relevance of the numbered areas in grey shading and is generally unclear when displayed in its entirety on a normal		

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	monitor. When you zoom in the underlying text becomes unreadable. The maps numbered 1 to 26 that follow are clearer but do not display enough information for the user to readily identify the areas shown on the maps and the significant changes that they reveal to the site boundary in many places should have formed part of the statutory consultation. On the map which has the title *Abnormal Invisible Loads (AIL) Routes, t*he background information (settlements, roads, woods, field boundaries etc) is almost invisible when the entire map is displayed, therefore the map is of very limited use for the assessment of impacts created by abnormal loads. It is also confusing to the user to have abnormal loads described as "invisible"		
Transport and Access	East Pye Solar – Proposed HGV Routes Map This map is similarly just an overlay on a faded indistinct OS map making it impossible to assess impacts accurately, particularly on settlements, minor roads and dispersed housing. It also shows a number of new HGV routes identified since the statutory consultation and is a further reason why the statutory consultation should be re-done.	No	Construction vehicle routeing has been designed to avoid sensitive receptors where possible, and appropriate mitigation and management measures have been identified in the **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** and **Outline Construction Management Plan (oCTMP) [EN0110014/APP/7.6]** to accommodate this. The strategy employs the construction of internal haul routes where feasible to reduce the use of the existing local road network. The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. It excludes the use of B1527, through Hempnall Village, and uses roads that are not the subject of restrictions to standard legal vehicles. The Applicant also refers to its responses above regarding further statutory consultation and accessibility of maps.
Reasonable Alternatives and Design Evolution	The failure of the developers to recognise that they are still including infrastructure on land that is already part of another company's permitted solar farm is a serious inadequacy in this consultation. On page 4 the developers admit that the land southwest of Site 1, formerly identified as the	Yes	The Applicant notes this. The updated **ES Volume 2, Figure 4.1 -Indicative Masterplan [EN0110014/APP/6.2.4.1]** shows that Sub-Site 1C has been removed from the Scheme. As explained in the **Design Approach Document [EN0110014/APP/7.17]** An environmental appraisal (RAG rating exercise) was undertaken for the two

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	National Grid Substation Site (Option 1), is not their land but they still show, on the map on page 4, that some of the associated East Pye development will take place on this site which is part of another company's solar farm permission (P.A.C.E.) - i.e. where the label 1C appears on this map to the south west of Site 1 is an area that East Pye identifies as a site where work would take place to connect the National Grid sub-station to the existing overhead transmission electric lines but this is part of another company's planning permission for a solar farm (SNC 2024/3817). This error is repeated on Map 4 on page 8 where 1C is again shown to occupy land that is part of another company's scheme.		options for the location of the National Grid Substation. Primarily owing to the approval of the solar farm (ref. 2024/3817) during the period of the statutory consultation, the location of which overlapped with Option 1, Option 2 located in Sub-Site 1B was taken forward as the location of the National Grid Substation (as presented at the targeted consultation). However, Option 2 was also considered preferable from a flood risk and landscape and visual perspective owing to the proximity of Option 1 to the Starston Brook floodplain and the requirement for PRoW diversion associated with Option 1. The Applicant also recognised that another application existing does not prevent material from depicting it within the red line boundary – this is not an error.
Transport and Access	The land-take to accommodate changes to visibility splays and road edges to accommodate abnormal loads and other construction traffic is considerable and would involve the removal of a lot of mature existing vegetation which would cause substantial environmental damage. All of this should be assessed as part of a statutory consultation and not be included as an afterthought in a targeted consultation.	No	Existing field accesses have been used wherever possible to mitigate vegetation loss. Observed speed and traffic flow data has been used to reduce the extent of visibility splays where possible to further mitigate vegetation loss. The proposed access strategy has been developed in consultation with Norfolk County Council as Local Highway Authority and that includes negotiations over the extents of visibility splays at access points. Where accesses are to be temporary for the construction period, vegetation will be replaced. With the exception of the vehicle crossing points vegetation within visibility splays will be coppiced to just above ground level rather than root removal. Landscape professionals have advised on the designation of trees and where possible accesses have been located to avoid tree removal or impact. The Applicant also refers to its responses above regarding further statutory consultation. Management and mitigation measures are detailed in the **Outline Construction Traffic Management Plan (oCTMP) [EN0110014/APP/7.6]**. Prior to the commencement of construction of the Scheme, the Applicant will produce a detailed CTMP that must be substantially in accordance with this Outline CTMP. Preparation of the detailed CTMP is secured by a DCO Requirement and will be submitted for approval by the relevant planning authority

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Consultation and Engagement	There are a number of flaws on the maps included in this document, (i.e. in the East Pye Targeted Consultation Information Change Note) for example: The map on page 3 is unclear, difficult to read and has an incomplete legend. The map on page 4 shows that part of the East Pye site 1C is located on another company's land. The map at the top of page 5 re. site 1B has no legend and the shading lacks clarity, particularly where there are overlaps. It also shows part of site 1C as being located on another company's land The map at the bottom of page 5 re. site 7D is confusing because the legend shows a shade of yellow to define the land that will contain solar photovoltaic arrays but on the map itself different shades of yellow are used east and west of Broaden Lane for the fields that would contain this infrastructure. This is very confusing to the map user. The map on page 6 has an incomplete legend, the grey numbered areas are not referenced, and they merge in places with the grey colouration of settlements. Furthermore, this map is meant to show further changes to the scheme boundary and these are not at all clear when the map is displayed in its entirety on a normal computer screen. The fuzziness beneath the grey shaded areas is even more pronounced when zooming in.	No	The Applicant acknowledges that the respondent may have found it difficult to engage with the Map referred to in the Information Change Note (found in **Consultation Report, Appendix 9 – Targeted Consultation Materials [EN0110014/APP/5.10])** (on page 3), however the map is not incomplete as suggested. This map highlights the areas of localised changes that were consulted during the Targeted Consultation and expands upon those individually in later pages of the document. As part of the Targeted Consultation exercise, the Applicant included additional land in Site 1C. It is not clear what company the respondent is referring to; the National Grid Substation being referred to is part of the Applicant's DCO application and Scheme proposals. The Applicant's use of the colour yellow on page 5 depicted the parcels of land containing solar PV, the areas where additional areas were not being consulted on were fainter. The Applicant regrets any confusion this may have caused respondents, although it is confident that the visual elements of the change note were adequate, proportionate, and informative. The purpose of the map on Page 6 is to show an overview of the changes, grey boxes containing numbers signal what is expanded upon starting on page 7. That is the numbers correlated directly with the more detailed individual changes listed from page 7 to 15. The Applicant's communication lines were open 5 days a week from 9am to 5pm to request further information or request physical copies of the consultation material provided on the website for ease of accessibility. The small nature of the changes being consulted meant that many of the individual changes displayed from page 7 to 15 were displayed to the best of the Applicant's knowledge and ability. Road names were enlarged to enable better understanding of the area being referred to. The map on page 6 was included to help identify areas being referred to.

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	The maps on pages 7 to 15 contain inaccuracies and in some cases do not enable the user to identify the exact location displayed on the map. For example, Map 14 on page 11 (Fairstead Lane between sites 7B and 7C) incorrectly labels a PROW that trends north to south as Fairstead Lane, whereas Fairstead Lane is actually the road at the bottom of the map that trends west to east. This inaccuracy is unacceptable, and the consultation should be re-done with the inclusion of an accurate map that would not mislead the user. Map 21 on page 14 does not supply enough locational information to identify the area that would be subjected to change. A user of this map would find it hard to identify the place when the only wording on the map is “The Green”.		
Landscape and Visual	Map 11 on page 10 (Site 5A) indicates vegetation removal along the north of the B1527 in an area identified as High Landscape Value in South Norfolk Council ‘s Landscape Character Assessment Study, namely Tas Tributary Farmland.	No	Only minor vegetation clearance is proposed to the north of the B1527 within Sub-Site 5A to facilitate access. The South Norfolk Council Landscape Character Assessment does not assign landscape value to the landscape character areas. Effects on landscape character are assessed within **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and concluded to be not significant.
Landscape and Visual	Map 13 on page 11 (Site 7A) shows that vegetation along a lovely country lane, which is definitely unsuitable for use by HGVs, would be removed in an area that is adjacent to a landscape character area of the highest quality as identified in South Norfolk Council ‘s Landscape Character Study, namely Tas Tributary Farmland.	No	Vegetation clearance along Fairstead Lane is expected to be minor and required to facilitate access. The South Norfolk Council Landscape Character Assessment does not include an assessment of landscape quality. Effects on landscape character are assessed within **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and concluded to not be significant.

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Landscape and Visual	Maps 15, 16, 19 & 20 on pages 12 & 13 show vegetation removal that is unacceptable to Hempnall Parish Council as it would negatively impact the character of these rural areas.	No	Effects on landscape character are assessed within **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and concluded to not be significant. The exact extent of minor hedgerow works (pruning and removal), and widenings of existing gaps will be confirmed post DCO consent. No hedgerow works (pruning and removal) can take place until a detailed LEMP has been approved by the relevant planning authority, as secured by Requirement 7 of the **draft DCO [EN0110014/APP/3.1]**. All minor hedgerow works (pruning and removal) will be carried out in accordance with the final, approved version(s) of the LEMP.
Landscape and Visual	Map 17 on page 12 and Map 18 on page 13 which indicate that vegetation and street furniture would be removed along a stretch of road that passes through the Conservation Areas of Saxlingham Village and Saxlingham Green clearly demonstrates the unacceptable impacts that would result from this scheme if permitted.	No	The AIL swept path analysis indicated that it is unlikely that any street furniture will need to be removed in the Conservation Areas to accommodate the vehicle movements. However, if this is required, all street furniture would be subsequently reinstated. It is not considered that this would result in any more than a negligible impact on the Conservation Areas and would be by its nature inherently short-lived and reversible. Prior to the commencement of construction of the Scheme, the Applicant will produce a detailed CTMP that must be substantially in accordance with this **Outline Construction Traffic Management Plan (oCTMP) [EN0110014/APP/7.6]**. Preparation of the detailed CTMP is secured by a DCO Requirement and will be submitted for approval by the relevant planning authority.
Transport and Access	On page 16 the changes to the AIL routes which would involve abnormal loads passing along minor roads from Poringland through Stoke Holy Cross and Saxlingham Village enroute to Saxlingham Green is clearly an impractical approach to facilitate construction.	No	An assessment of AIL routes has been undertaken, involving liaising with NCC and NH. Outcomes have been reported in the **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** and **Outline Construction Traffic Management Plan (oCTMP) [EN0110014/APP/7.6]**. Suitable management and mitigation measures have also been identified in the ES and CTMP.
Consultation and Engagement	On page 18 under “Next Steps” it says, *“We are only seeking your comments on the 26 changes detailed on pages 6 to 14.”* This is a very misleading statement as the targeted consultation involves much more than this, e.g. Change in the	No	The Applicant refutes that the sentence included on page 18 of the Information Change Note is misleading or incorrect. The following sentence reads: “However, if this is your first time being consulted on the proposals for East Pye Solar (i.e. you were not consulted or did not

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	size and location of the National Grid sub-station and the expansion of activities on site 7D. By appearing to limit consultees' responses to just these 26 changes, responders could think that they must not mention the other aspects of the targeted consultation. This misrepresentation alone surely requires at least a re-run of the targeted consultation with the correct response information provided.		receive communications regarding Phase One or Phase Two consultations), we welcome and will consider any further feedback from you regarding East Pye Solar in general." The Applicant was clear in this regard and has considered all feedback received during the targeted consultation including any general comments including any comments on changes in the size and location of the National Grid Substation and expansion of activities in Site 7D.
Consultation and Engagement	The Planning Act 2008 requires applicants to give consultation bodies and the public "sufficient information about the characteristics of the proposed NSIP in order to enable them to respond in an effective and timely way". If maps are so poor (e.g., vague, misleading, inaccurate, or low resolution) that they fail to clearly show what land is affected or the nature of the project, this requirement may not be met. Hempnall Parish Council does not consider that several of the maps included in this consultation fulfill the requirements identified in the 2008 Planning Act. East Pye should be required to carry out another full statutory consultation containing accurate and clear maps and information.	No	The Applicant notes that some respondents may have been challenged in reading the maps available – every effort was made to ensure this information was clear and the Applicant is confident that the opportunity for clarification was made available to all interested parties. The Applicant also notes that materials were available in hard copy or accessible formats upon request. Statutory bodies, including parish councils, were presented with the opportunity to engage with the community relations team in regard to consultation material or for further clarity through the various phases of consultation and after this period. The Applicant also refers to its responses above regarding further statutory consultation.

2.4 Norfolk County Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Scheme Description	The County Council in responding to the PEIR consultation in August 2025 indicated its preference for the southern substation site (Option 1) as it was further away from Great Moulton and would consolidate transmission infrastructure into one area avoiding: a wider visual impact; and disruption to local residents during construction. 3.8 The updated location of the National Grid substation close to the village of Great Moulton raises the following concerns in relation to: (a) The visual impact on local residents and the setting of Great Mouton Village (see landscape comments below); (b) This close proximity raises health and safety concerns particularly in the event of fire breaking out at the substation (see Norfolk Fire and Rescue Service comments below); (c) The wider health and mental health Impacts on the residents directly affected, which have not been considered to date by the applicant. These issues need further investigation. See additional Public Health comments below. 3.9 Given these strong concerns the applicant needs to consider and find an alternative National Grid substation connection point in a more suitable location away from any immediate residential area/s.	Yes	The Applicant notes this. As explained in the **Design Approach Document [EN0110014/APP/7.17]** an environmental appraisal (RAG rating exercise) was undertaken for the two options for the location of the National Grid Substation. Primarily owing to the approval of the solar farm (ref. 2024/3817) during the period of the statutory consultation, the location of which overlapped with Option 1, Option 2 located in Sub-Site 1B was taken forward as the location of the National Grid Substation (as presented at the targeted consultation). However, Option 2 was also considered preferable from a flood risk and landscape and visual perspective owing to the proximity of Option 1 to the Starston Brook floodplain and the requirement for PRoW diversion.
Scheme Description	The County Council in commenting on the PEIR consultation sought further clarification on the potential need for new pylons associated with the grid connection infrastructure needed as part of the solar farm	Yes	The Applicant has sought to minimise the need for new overhead cables. Grid connection infrastructure will nevertheless be required between the National Grid Substation and the existing 400 kV overhead line (Norwich Main – Bramford).

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	proposal; and had sought that this infrastructure be undergrounded. The County Council indicated that it would have serious concerns to any new pylons in the area. 3.12 It is felt that the above concerns raised by the County Council previously matters have not been addressed by the applicant and the above change/clarification in the height of a new 400 kV tower raises further concerns in terms of visual impact		The Scheme proposes to divert the existing dual-circuit 400 kV overhead line into a newly constructed double-busbar substation (the National Grid Substation). These works will be delivered in carefully planned stages to maintain safety, minimise disruption and ensure continuity of supply throughout. As detailed in **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5**] accommodation for the potential for Grid Connection infrastructure (including new/replacement pylons) were included in the evolution of the Scheme. This included the additional land to the northeast and southwest of Sub-Site 1B owing to the development of the Grid Connection infrastructure, as presented during the Targeted Consultation.
Scheme Description	[Location change of 132 kV substation and upgrade to 400kV] While the proposed shift in location to the East is minor; the upgrade from 132 kV to 400 kV will result in a more visible structure with the maximum height increasing from 7m to 13m. In addition the footprint of the 400 kV substation compared to the original 132 kV substation appears from the consultation maps to be significantly larger (clarification on the footprint size is needed). As such there are concerns regarding the visual impact on Great Moulton and the surrounding countryside associated with this change	No	**ES Volume 2, Figure 4.1 Indicative Masterplan [EN0110014/APP/6.2.4.1]** shows where mitigation has been proposed in order to address screening concerns relating to infrastructure located in proximity to Great Moulton. This includes areas for mitigation along the northern boundary of Sub-Site 1B, as well as along Narrowgate Way and Frith Way.
BESS	The proposed changes / confirmation on the siting to the National Grid 400kV substation raises serious concerns to NFRS given the close proximity to nearby resident in Great Mouton in the event of any fire or other		The **Outline Battery Safety Management Plan (OBSMP) [EN0110014/APP/7.5]** confirms that a robust and validated Emergency Response Plan (ERP) will be developed at the detailed design stage in consultation with Norfolk Fire and Rescue Service (NFRS). Section 4.4 of

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	emergency. 3.18 In particular NFRS have concerns relating to: (1) Emergency Vehicle Access; (2) Cordon Control; and (3) Protection for residents from any smoke plume; 3.19 In addition the location change of the 132 kV substation and upgrade to 400 kV to the South of Great Moulton raises similar concerns to the above National Grid substation.		the OBSMP covers all key aspects of Emergency Planning for the BESS site. The Applicant has also commissioned a Plume Study (B**ESS Fire Emissions Modelling report [EN00110014/APP/7.5]**). The Plume Study concludes that there are no predicted exceedances of the relevant air quality standards at residential receptors in the Study Area in the event of a BESS fire.
Water Environment	3.22 The LLFA is unclear on a couple of matters regarding the specific land use in Site 1. It is not clear how the scheme plans to manage the interaction with the existing high voltage line. It appears from the sketch in Site Map A there is a larger offset to keep panels away from trees than from high voltage power lines. Clarification is requested. 3.23 The LLFA notes that Option 2 is the preferred National Grid proposed substation location as the area for Option 1 was partly not available due to an existing granted solar farm application. The LLFA further notes the permitted proposed solar farm intends to construct solar panels that the NAFRA2 flood maps show as within Flood Zones 2 and 3 and within high to low areas of surface water flood risk. It is understood that no exception test was applied at the time. It is not clear what the remaining area of option 1 outside of the existing planning application will be used for. Further information is required.	Yes	The Scheme has been updated so that no electrical infrastructure is located within Flood Zones 2 or 3. Whilst some Solar PV Arrays are still located within areas of 'low' to 'high' surface water flood risk, they are raised above the ground on narrow supports and have suitable freeboard above anticipated surface water depths. Therefore, the Exception Test is not required in accordance with NPPF PPG paragraph 027. Areas of Option 1 (now 1C) will be used for overhead line works.
Water Environment	3.24 The LLFA notes the substantial impermeable area that will require surface	Yes	Areas of surface water flood risk will be captured within the proposed surface water drainage system. Substation compounds will have a nominal

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	water management with both the National Grid substation and the 400kV substation will require surface water management due to the significant increase in impermeable areas associated with the structures. The LLFA notes the latest NAFRA2 surface water flood risk mapping shows there are noticeable areas of high to low surface water flood risk areas on these areas of the site. The proposed development would need to ensure there is no increase in surface water flood through the displacement of the existing surface water attenuated on site. This surface water would need to be accounted for in the proposed surface water management approach to support the design and the applicant will need to demonstrate there is sufficient space available. However, at present there is not sufficient information available to assess the surface water management. Further information is required.		perimeter feature for conveyance of overland flows from adjacent/upstream field areas. This is detailed in the **ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Drainage Strategy [EN0110014/APP/6.3.9.1]**.
Water Environment	3.25 The text is not clear, but it appears that an additional area of field is proposed to be covered in PV panels. The LLFA continues to note that this area is in the head of the catchment of a natural flood management scheme lead by the LLFA in Saxlingham. The LLFA are aware this catchment is sensitive and will require clear demonstration there is no increase in flood risk associated to the development. Further information will be required.	Yes	Solar PV Arrays are raised up on narrow supports allowing flow of surface water runoff beneath. The supports represent a negligible impermeable area/footprint. This is detailed in **ES Volume 1, Chapter 9: Water Environment [EN0110014/APP/6.1.9]**.
Water Environment	3.27 Area 2 - The widening of the road would lead to an increase in the impermeable areas	No	No increase in impermeable areas is proposed for these works.

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	that could increase surface water runoff. Additional surface water management for the increased area would be required. Further work required. 3.29 Area 4 - Temporary construction works. It is not clear at this time whether an increase in impermeable area is anticipated due to insufficient information being provided at this time. Further information is required to determine whether there is an increase in impermeable area that could increase surface water runoff. Further work required. 3.31 Area 6 - Temporary construction works. It is not clear at this time whether an increase in impermeable area is anticipated due to insufficient information being provided at this time. Further information is required to determine whether there is an increase in impermeable area that could increase surface water runoff. Further work required. 3.36 Area 12 - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. There are also references to minor alterations to the roundabout, but it is not clear what these would involve and whether these would result in an increase in impermeable areas. Further information is required to determine whether there is an increase in impermeable area that could increase surface water runoff. Further work required.		

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	3.38 Area 14 - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. There are also references to creating an internal access track. This would be an increase in impermeable area and that would result in an increase surface water runoff. Further information is required to determine whether there is enough space provided to attenuation and manage the increase in surface water runoff. Further work required.		
Water Environment	3.26 Area 1 - Vegetation and temporary street works removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.28 Area 3 - Vegetation and temporary street works removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.30 Area 5 - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.32 Area 7 - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment.	No	The Applicant acknowledges these comments and refers to its statements re. no increases in impermeable areas above.

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	3.34 Area 10 - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.35 Area 11 - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.37 Area 13 - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.39 Area 15 - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.40 Area 16 - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.41 Area 17 - Vegetation and temporary street works removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.42 Area 18 - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.43 Area 19 - Vegetation and temporary street works removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment. 3.44 Areas – 20 to		

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	26 Inclusive - Vegetation removal with no indication of any increase in impermeable areas that could increase surface water runoff. No further LLFA comment.		
Transport and Access	3.33 Area 8 and 9 - It is clear the applicant is using out-dated base mapping and has not recently visited the area to undertake the assessment because the maps used do not contain or consider the now operational Long Stratton Bypass that was opened earlier this year. The LLFA recommends the applicant uses the latest available data when undertaking these assessments. Further work is required.	Yes	The Applicant is aware of the progress and completion of the Long Stratton Bypass, and the proposed access strategy including routeing descriptions and maps acknowledges the use of the bypass for access to the Scheme. Revised base maps have been utilised which indicate the bypass location and use. Routeing descriptions and maps are detailed in **ES Volume 1 Chapter 11 Transport and Access [EN0110014/APP/6.1.11], ES Volume 2 Figures 11.2-11.8 Likely and Suitable Routes to the Scheme [EN0110014/APP/6.2.11.2-11.8**], and the **OCTMP [EN0110014/APP/7.6].**
Cultural Heritage	Since the County Council's previous response, the applicant has prepared an archaeological desk-based assessment informed by the results of a geophysical survey and analysis of aerial data sources. 3.48 Trial trenching has also been undertaken on relatively limited parts of the application area and the County Council is awaiting a detailed report on this work. Form the site monitoring visits the County Council has made it is clear that archaeological remains of regional significance exist and have been found. 3.49 At regional and national level, the Association of Local Government Archaeological Officers are engaged in a debate with the solar industry over the impacts of solar array piles and associated cables on below-ground archaeology. 3.50 The impactful nature of infrastructure such a substations are not a matter debate.	Yes	The results of the archaeological trenching will be used to inform discussions with the NHES on the formulation of the detailed AMS (**ES Volume 3 Appendix 10.6 Archaeological Mitigation Strategy [EN0110014 /APP/6.3.10.6]**).

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Cultural Heritage	3.51 The proposed changes to the scheme outlined above serve to increase potential impacts on below-ground archaeology. 3.52 A significant amount of archaeological mitigation will be required in association with the East Pye Solar Farm and the applicant is urged to work closely with the County Council's Historic Environment Team.	No	This is noted by the Applicant, who has worked and will continue to work closely with the NCCHET on ensuring an appropriate level of archaeological mitigation.
Ecology and Biodiversity	3.54 It is strongly recommended that existing trees and hedges are considered at an early stage of planning in line with BS 5837: Trees in Relation to Design, Demolition and Construction – Recommendations. Early consideration will help avoid significant impacts and enable conflicts, particularly with regard to trees adjacent to the highway, to be designed out or appropriately mitigated.	Yes	The DCO submission includes the provision of **the Biodiversity Net Gain Report [EN0110014/APP/7.23]** and the Scheme's **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24]** which details all habitat impacts. Existing trees and hedgerows have been fully considered in the design, and the majority of the vegetation would be retained. Offsets from existing veteran trees, hedgerows and ancient woodland are incorporated in accordance with the provisions set out in **ES Volume 1, Chapter 4 The Scheme [EN0110014/APP/6.1.4]**. Protection of existing vegetation during construction is set out in **OCEMP [EN0110014/APP/7.1]**. Mitigation measures in relation to habitat enhancements are secured in the **OLEMP[EN0110014/APP/7.4]**.
Ecology and Biodiversity	3.55 The current and future shade patterns of trees (both retained and planted) should be considered to reduce the requirement to prune trees to minimise shading of solar panels.	Yes	Offsets from existing vegetation are incorporated in design as set out in **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]** and secured in **OLEMP [EN0110014/APP/7.4]**, to reduce the requirement to prune due to over shading.
Ecology and Biodiversity	3.56 New and widened field entrances may necessitate tree and vegetation removal to achieve appropriate turning circles and visibility splays. This must be considered in line with BS5837	Yes	**ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10]** considers the indicative access points as having potential for impacts on adjacent tree features in accordance with BS5837. Matters in relation to habitat protection and enhancements are assessed in the **OLEMP [EN0110014/APP/7.4]**. A Hedgerow Removal Plan is provided in Appendix A of the **OLEMP [EN0110014/APP/7.4].**

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Ecology and Biodiversity	3.57 It should be noted that ownership of trees and hedges adjacent to the highway often lies with the adjacent landowner and not the HW authority, but this is not always the case. Establishing ownership of trees and hedges that may be impacted by the proposals should be established at an early stage.	Yes	Ownership of hedgerows and trees has been established as part of the design process to ensure effectiveness of existing vegetation screening. Mitigation measures in relation to habitat protection and enhancements are secured in the **OLEMP[EN0110014/APP/7.4]**.
Ecology and Biodiversity	3.59 Extent of vegetation removal should be included in the assessment as well as the additional areas will need to be brought into the PEIR assessment as well as encompassed in BNG metric calculations. 3.60 Areas of roadside verges may impact on Roadside Nature Reserves and as such these areas should be mapped against the proposed scheme.	Yes	All habitats within the Order Limits are mapped and considered, including areas of roadside verges that may impact on Roadside Nature Reserves. The DCO submission includes the provision of the **Biodiversity Net Gain Report [EN0110014/APP/7.23] and** the Scheme's **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24]** which details all habitat impacts. Habitat protection measures are outlined in the **Outline OCEMP [EN0110014/APP/7.1]**.
Cumulative Impact	3.61 Cumulative Impact - It is noted that the Tasway scheme is in close proximity to East Pye and therefore should be included in cumulative assessments. This also applies for the BESS.	No	Tasway Energy Park has been placed on indefinite hold.
Landscape and Visual	• Confirmation that the proposed National Grid 400 kV substation will be located in Site 1B (south of Great Moulton). From a landscape and visual perspective, The County Council had previously indicated a preference for the Southern Site due to its location further away from Great Moulton. The proposed location within Site 1B raises significant concerns regarding the landscape setting and visual impact on Great Moulton and therefore the County Council would strongly encourage the applicant to consider alternative locations as part of their assessment whereby residential amenity impacts could be decreased. Further	No	The landscape and visual constraints associated with the National Grid 400kV substation (400kV Substation 1) were considered as part of the design process, alongside a range of other constraints. The design evolution is set out in **ES Volume 1, Chapter 5: Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5].** A linear belt of trees is proposed along the boundary facing Great Moulton to reduce visual effects. The landscape mitigation measures are described in the **OLEMP [EN0110014/APP/7.4]**. Based on representative viewpoint VL3/Site 1 in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]**, there would be a residual significant visual effect on residents at Great Moulton at this

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	details are required to understand the design and scale of the proposed substation and proposed landscape mitigation required. • Confirmation that the Customer substation will be upgraded from 132 kV to a 400kV Substation and moved to the east. While this is a relatively small change in terms of location the upgrading will involve a significant increase in the height of the air-insulated structure on site from 7 m associated with the previously proposed 132 kV substation to 13 m for the 400kV substation. Given the close proximity to Great Moulton the proposed change raises significant concerns regarding the landscape setting and visual impact on the village. Further details are required to understand the design and scale of the proposed substation and proposed landscape mitigation required		location. This effect will therefore need to be taken into account in the planning balance.
Landscape and Visual	• Requirement for a taller Pylon. The County Council reiterates concerns raised during the PIER stage regarding the potential landscape impacts of taller pylons. Further information is required to understand these details and the potential landscape and visual impacts. This is particularly relevant to long-distance views and cumulative effects alongside existing and proposed infrastructure.	No	A comparative ZTV (**ES Volume 2 Figure 7.5: ZTV with View Locations [EN0110014/APP/6.2.7.7]**) was produced to assess the difference in visibility between the existing pylon and the proposed taller pylon. The results indicate that the two ZTVs are very similar, with only minor variations in extent.
Landscape and Visual	Inclusion of Solar panels within Site 7D. The inclusion of approximately 4.85ha marginally extends the overall footprint of the site, in isolation this is a small increase. However, the increase contributes to an already extensive proposal for built solar infrastructure within the landscape. It will be essential for the applicant	No	The extent of Solar PV panels has increased within Sub-Site 7D but has decreased in other areas, such as Sub-Site 8B. Detail of the Scheme is presented in **ES Volume 2 Figure 4.1 Indicative Masterplan [EN0110014/APP/6.2.4.1]**. This change has been assessed within the **ES Volume 1, Chapter 7 - Landscape and Visual [EN010168/APP/6.1.7]**.

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	to demonstrate how this extension has been considered within the cumulative landscape and visual impact assessments, including any required screening or mitigation planting. This is of particular importance when considering the potential cumulative impacts alongside other proposals in the area		. While the increase does not constitute a separate cumulative development (as the footprint remains within the applicant's Site and Scheme), its contribution to overall landscape and visual effects has been considered in the cumulative LVIA included in the ES. Native broadleaf woodland is proposed to the south of Saxlingham Green to provide screening and reduce potential visual effects from the extended footprint.
Landscape and Visual	Additional of small parcels of land adjacent to Site 1. The applicant has stated that small additional parcels of land have been included adjacent to the northeast and southwest of Site 1. This marginally extends the development area however should still be fully assessed, especially where they may introduce any above ground infrastructure, or where construction effects could be increased.	Yes	The **ES [EN0110014/APP/6.1]** has fully appraised all land within the Order Limits, including the additional land parcels identified, in accordance with the methodologies set out in the respective topic chapters.
Landscape and Visual	Further land required to accommodate movement and visibility splays. The County Council would expect these to involve minor small-scale changes along road, junctions or access points. However, as this will likely involve vegetation clearance, tree removals and alike this could pose a landscape concern should these not be considered or undertaken sensitively. Whilst minor works such as this have the potential to erode rural character of narrow lanes and roadside verges and result in widespread landscape change. Restoration must also be undertaken in a considered and sensitive manner to avoid visual clutter.	No	These highway sites are required to facilitate the movement of Abnormal Indivisible Loads and to support construction activities for the Scheme. The anticipated effects include minor vegetation clearance, such as crown lifting and pruning, which would be temporary and limited to the construction phase. Given the limited scale and short-term nature of these effects, the effect are unlikely to be significant, and therefore are not assessed further in the **ES [EN0110014/APP/6.1]**.
Public Rights of Way and Recreation	3.68 We have concerns over the length of time that large areas of the PRoW network will be closed. Particularly in areas close to settlements. There needs to be a clear mitigation plan for this, and we would consider	Yes	The **ES [EN0110014/APP/6.1]** has considered the impact of the Scheme on PRoW in all phases and identified suitable management and mitigation measures including diversionary routes through the provision of **an Outline Public Rights of Way and Permissive Paths Management Plan [EN0110014/APP/7.8]**. The impact on Boudicca Way on Fairstead Lane

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	discussions around s106 or similar to secure improvements to the network as mitigation for these impacts. 3.69 Part of Boudicca Way – a Norfolk Trails promoted route – running along Fairstead Lane will be closed for a considerable period during construction and potential diversions to avoid this will likely mean that a loop of the trail through Tasburgh will be lost with a significant impact on access to the countryside for the village. We expect to see an assessment of the impact of this and a clear plan for mitigation of the impacts. The County Council will also consider the need to enter into discussions around s106 to secure long term improvements to that Trail as mitigation and compensation.		has now been removed through the agreement with NCC to route construction vehicles via the Krons rather than Fairstead Lane west via the junction with the A140.
Socio-Economics	3.72 With regard to the targeted consultation and the proposed localised changes, NCC Public Health notes several potential issues regarding the proposed location and scale of the National Grid substation. Notably. a. The confirmation of Option 2 as the preferred location places the National Grid substation in close proximity to Great Moulton. b. The upgrade of the customer substation from 132 kV to 400 kV means a significant increase in the size of related infrastructure (i.e. the maximum height increasing from 7 metres for 132 kV to 13 metres for 400 kV). 3.73 Taken together, these changes heighten the potential for disturbance and adverse amenity impacts on nearby residents, particularly those in and around Great Moulton, and increases the likelihood of adverse impacts relating to health and wellbeing. There is no evidence at this	Yes	The landscape and visual constraints associated with the National Grid 400kV substation (400kV Substation 1) were considered as part of the design process, alongside a range of other constraints. The design evolution is set out in **ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5]**. A linear belt of trees is proposed along the boundary facing Great Moulton to reduce visual effects. The landscape mitigation measures are described in the **OLEMP [EN0110014/APP/7.4]**. Within **ES Volume 1, Chapter 18 Other Environmental Matters [EN0110014/APP6.1.18]** a human health summary statement has been provided which assesses likely human health effects considered elsewhere within the Environmental Statement, including in combination and cumulative effects, as well as listing appropriate mitigation. This has been undertaken using the World Health Organisation (WHO) definition of health which encompasses both physical and mental health. However, it is

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	stage relating to either the physical or mental health implications of the proposed changes. 3.74 Chapter 19 of the PEIR identifies that the combined effects of significant visual impacts and minor adverse effects (e.g. noise, socio-economics, water environment) are likely to result in a significant in-combination effect on local residents and users of the area during the scheme's operation. The proposed changes outlined in the targeted consultation material may further intensify these effects, particularly for vulnerable residents in and around Great Moulton. NCC Public Health therefore expects that the ES will include a full assessment of these effects and propose appropriate mitigation measures where adverse impacts are identified.		noted that mental health impacts are primarily considered within the **Equalities Impact Assessment [EN011001/APP/7.19]**. As human health was scoped out as a standalone assessment topic within the Environmental Statement, with agreement of the Planning Inspectorate, this approach follows best practice guidance from the Institute of Sustainability and Environmental Professionals (ISEP, formally known as IEMA) regarding the reporting of human health effects within EIA. This guidance does not recommend introducing new effects as part of a human health summary statement and therefore amenity impacts in regard to the Scheme, including the substation, are primarily considered within **ES Volume 1, Chapter 7 Landscape and Visual [EN0110014/APP/6.1.7]** and in **ES Volume 1, Chapter 11 Transport and Access [EN0110014/APP/6.1.11]**, and summarised from a health perspective.
Socio-Economics	3.75 It should be noted that the PEIR did not address the mental health and wellbeing implications of the scheme. NCC Public Health previously emphasised the importance of considering these, particularly in relation to the combined effects of noise, visual intrusion, and perceived risks associated with large-scale infrastructure. It is especially important to consider the effect of these impacts on the mental health and wellbeing of vulnerable populations, particularly older adults and those with Special Educational Needs and developmental conditions. Such groups can be more sensitive to changes in their environment, particularly in relation to noise, and as such the impacts of the proposed substation location in close proximity to Great Moulton should be appropriately assessed in	Yes	Mental health impacts are primarily considered within **The Equalities Impact Assessment [EN011001/APP/7.19**], which includes consideration of those with Protected Characteristics under the Equalities Act 2010, which includes those with disabilities. It is included in this assessment that the construction and operation of the Scheme may have negative impacts on the mental health of individual local residents however, it is outside the scope of the assessment to undertake engagement regarding these issues above and beyond the opportunity offered for local residents to raise concerns through public consultation undertaken by the Applicant.

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	relation to mental health. 3.76 Given the proposed changes, NCC Public Health continue to recommend that the ES includes a dedicated assessment of mental health and wellbeing impacts, taking into account both in-combination and cumulative effects, with specific consideration of vulnerable communities, for both construction and operation of the project. 3.77 The County Council previously expressed as part of its response to the PEIR consultation a preference for an alternative substation site further from Great Moulton; this would consolidate transmission infrastructure and minimise any impacts on residents during operation and construction. Based on the confirmed location of the National Grid substation and the absence of a mental health impact assessment, NCC Public Health recommends that further analysis is undertaken to understand the impact of the changes on local residents' health and wellbeing. As part of this, community engagement should be undertaken so that the perceived impacts on residents can be fully understood.		
Transport and Access	The location of the National Grid Substation will still require all construction traffic to be accessed from a new access on Station Road. Any alternative is not considered acceptable. If Broadgate Way, Firth Way and Hurricane Lane are proposed, then highway improvements will be required and detailed schemes indicating the proposed works including highway boundary information should be submitted.	Yes	Access to the National Grid will be from access A2 on Station Road this includes AILs. From this access vehicle movements will be internalised within the BESS site and Sub-Sites 1A-D. Further information on this can be found in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**, **ES Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1]** and **OCTMP [EN0110014/APP/7.6].**

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	The current information is not considered adequate.		
Transport and Access	To access the proposed parcels of land (1C and 1D) crossover points over Firth Way and Hundred Lane would be required, the details of which would need to be agreed with the highway authority and subject to all appropriate standards/safety audits etc. It is expected that access for all parcels, the proposed substation and the BESS are served from a new access on Station Road with haul routes within the site. The highway authority will not accept traffic associated with the development using inappropriate roads.		Access to Sub-Sites 1A-D, BESS and substations will be from access A1or2 on Station Road this includes AILs. From this access vehicle movements will be internalised within the BESS site and Sub-Sites 1A-D. Details for crossover points on Frith Way and Hundred Lane will be agreed with NCC in advance in accordance with relevant standards, auditing and permitting etc. Further information on this can be found in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**, **ES Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1]** and **OCTMP [EN0110014/APP/7.6].**
Transport and Access	In the description for changes to Site 1B, the 132kv substation is proposed to be upgraded to a 400kv. All AILs will need to be accommodated along the Haul Route. Any other routes are not considered appropriate. Should they be proposed, a detailed scheme would be required with information including the highway boundary detail. The current information is not considered appropriate.		Access to Site 1B and the 400kv substation will be from access A2 on Station Road this includes AILs. From this access vehicle movements will be internalised within the BESS site and Sub-Sites 1A-D. Further information on this can be found in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**, **ES Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1]** and **OCTMP [EN0110014/APP/7.6].**
Transport and Access	With regards to Site 7D, the highway authority does not have any comments regarding the rearrangement of the solar panels. However, construction traffic routes for Sites 7 to 9 have not been agreed with the highway authority. The highway authority will expect such routes to include haul routes with minimum junctions / impact on the local highway network.		The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. This include the use of internal haul routes through sites 7A-F, 7G-L and 8A-B. Information is provided in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** and **ES Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1]** set out the assessment of effects of transport and access on the road network during the construction and operational periods. Those documents indicate embedded and additional mitigation measures including those captured within the **OCTMP [EN0110014/APP/7.6],** the

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			Outline Public Rights of Way and Permissive Paths Management Plan [EN0110014/APP/7.8]; the Outline Operational Traffic Management Plan [EN0110014/APP/7.7] and other Management Plans. Those Management Plans are secured through Requirements in the DCO.
Transport and Access	Additional land proposals 1, 2 and 3 - these will be part of the AIL (Abnormal Indivisible Loads) routes and appropriate track runs / information will need to be provided including highway boundary information.		The movement of AILs associated with transformers and cable drums will be governed by the standard processes – with notification of the Movement Orders being made to the affected Local Highway Authorities, the police and affected structures owners. As deemed necessary, trained escorts will be used – which could include police assistance. The timing and management of the movements will be dictated by the police and Local Highway Authority. Movements are typically schedules during periods which will generate the least disruption to other road users and optimise safe travel for the public and those involved in moving the AIL. An assessment of AIL routes has been undertaken. Outcomes have been reported in the **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**, **ES Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1]** and **OCTMP [EN0110014/APP/7.6].**
Transport and Access	Additional land proposal 7 - the highway authority will not accept a new access on the A140 which is part of Norfolk's Major Road Network. All access to site 2A, B and C should be served by a haul route from Station Road using CRC2 and CRC3.	Yes	The accesses identified for sites 2A-C are all existing field accesses which are currently used by agricultural vehicles. These accesses have subsequently been discussed and agreed as suitable for use during construction and operation with NCC as LHA. Further information on this can be found in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**, **ES Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1]** and **OCTMP [EN0110014/APP/7.6].**
Transport and Access	Additional land proposal 8 – The highway authority will not accept any construction traffic using Hall Lane. All construction traffic including AILs should use a Haul route served via Parcel 4B.	Yes	Additional land proposal 8 identifies Hall Lane as an AIL route associated with cable drums for CRC4 as set out in the **OCTMP [EN0110014/APP/7.6].** It will not be used for general construction vehicles which will utilise CRC4 itself as a haul route. This has subsequently been agreed with NCC.
Transport and Access	Additional land proposal 11 - no issue with vegetation removal to help visibility.	No	The Applicant welcomes this comment.
Transport and Access	Additional land proposal 12 - in principle the highway authority would have no objections,	No	The Applicant notes the response and will consider this during detailed design.

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	subject to detail design regarding alterations to the junction.		
Transport and Access	Additional land proposals 13 and 14 – the highway authority does not consider the use of Fairstead Lane appropriate. All construction traffic should use a haul route from the B1527.	Yes	The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. NCC has advised that the strategy is adjusted to use The Krons, in preference to Fairstead Lane (between A140 and site 7A access). The strategy uses A140, B1527 and B1332 as the feeder corridors for construction traffic to minimise the use of other local roads except for the final connection to the land parcels. Where feasible, the strategy uses internal haul routes, to further reduce the use of the existing local road network. That strategy avoids movements through communities, such as Saxlingham Nethergate and Hempnall. Further information on this can be found in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**, **ES Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1]** and **OCTMP [EN0110014/APP/7.6].**
Transport and Access	Additional proposal 15 – there has been no agreement with regard to construction traffic and routing. If works are required, then more detailed information should be provided including the highway boundary.	Yes	Additional proposal 15 is required to ensure the required visibility splay for the proposed vehicle access for CRC7 can be achieved and may require pruning or removal of some vegetation. A concept access design drawing has been provided as part of the DCO submission.
Transport and Access	Additional proposals 16, 17 and 18. - these are not acceptable. As detailed previously, all construction traffic should use haul routes served form a B road as detailed previously.	Yes	Additional proposal 16 is required to ensure the required visibility splay for the proposed site vehicle access can be achieved and may require pruning or removal of some vegetation. Additional proposals 17 and 18 are associated with AIL movements for transformers and cable drums. These routes will not be used for general construction vehicles. The movement of AILs associated with transformers and cable drums will be governed by the standard processes – with notification of the Movement Orders being made to the affected Local Highway Authorities, the police and affected structures owners. As deemed necessary, trained escorts will be used – which could include police assistance. The timing and management of the movements will be dictated by the police and Local Highway Authority. Movements are typically scheduled during periods which will generate the least disruption to other road users and optimise safe travel for the public and those involved in moving the AIL.

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			Further information on this can be found in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**, **ES Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1]** and **OCTMP [EN0110014/APP/7.6].**
	Additional land proposal 19 – This is not acceptable as all traffic should be served by a haul route from a B road as detailed previously.	Yes	Additional proposal 19 is required to ensure the required visibility splay for the access to Sub-Site 6 on Alburgh Road. can be achieved and may require pruning or removal of some vegetation.
Transport and Access	Additional land proposal 20 - no issue with vegetation removal to help visibility for the CRC 10 although ideally this area should be served by a haul route which comes through CRC9.	Yes	Additional proposal 20 is required for access to CRC 10 to ensure the required visibility splay for the proposed vehicle access and crossing point can be achieved and may require pruning or removal of some vegetation.
Transport and Access	Additional land proposal 21, 22, 23, 24 and 25 – the construction traffic routes have not been agreed for the sites in this area. As stated previously, it is expected that these sites will be served with a haul route which is accessed from a B road.	Yes	The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. This include the use of internal haul routes through sites 7A-F, 7G-L and 8A-B. Information is provided in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** and **ES Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1]** set out the assessment of effects of transport and access on the road network during the construction and operational periods. Those documents indicate embedded and additional mitigation measures including those captured within the **OCTMP [EN0110014/APP/7.6],** the **Outline Public Rights of Way and Permissive Paths Management Plan [EN0110014/APP/7.8]; the Outline Operational Traffic Management Plan [EN0110014/APP/7.7]** and other Management Plans. Those Management Plans are secured through Requirements in the DCO.
Transport and Access	Additional land proposal 26 – it is expected that CRC14 will be served via a haul route through sites 10C, 10B etc. A crossing facility will need to be provided.	Yes	Additional proposal 26 is required to ensure the required visibility splay for the existing field access on Seething Road can be achieved and may require pruning or removal of some vegetation. It is the priority for construction vehicles to utilise CRC14 as an internal haul route. However, the access on Seething Road is retained as an option to provide flexibility.

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			The potential for a crossing facility will be confirmed at detailed design stage.
Transport and Access	All AIL routes will need consultation with both the highway authority and Norfolk Constabulary. It is expected that the AILs will use roads of an appropriate standard (A and B roads) to reach the site access points and then haul routes within the site. Any proposed HGV routing will require detailed assessment of the highway network which should include highway boundary information. At present, in general, the proposed construction routes are not considered acceptable. The highway authority expects the applicant to provide detailed information regarding access points on B roads with haul route information and crossing information where the haul routes cross the minor roads.	Yes	The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. This include the use of internal haul routes through sites 7A-F, 7G-L and 8A-B. Information is provided in **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** and **ES Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1]** set out the assessment of effects of transport and access on the road network during the construction and operational periods. Those documents indicate embedded and additional mitigation measures including those captured within the **OCTMP [EN0110014/APP/7.6],** the **Outline Public Rights of Way and Permissive Paths Management Plan [EN0110014/APP/7.8]; the Outline Operational Traffic Management Plan [EN0110014/APP/7.7]** and other Management Plans. Those Management Plans are secured through Requirements in the DCO.

2.5 Norfolk Wildlife Trust

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Reasonable Alternatives and Design Evolution	Change: Additional panels at site 7D This change involves an additional 4.85 ha of land being put under panels within site 7d, on land which was previously allocated as 'retained	Yes	As set out in the **Design Approach Document [EN0110014/APP/7.17]**, the design and layout of the Scheme in Sub-Site 7D would have led to the severance of an existing field. It was considered a more efficient design solution to move the landscaping screening belt further to the north to tie in which existing field boundaries (and which will make reinstatement of the field, at the

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	agricultural land and potential mitigation area'. We seek further details as to where the replacement mitigation area will be provided?		decommissioning stage more efficient), with solar panels to be provided in the area where the mitigation has been removed. The **DAD [EN0110014/APP/7.17]** sets out other areas, such as Sub-Site 8B, 10B, and 9 which have seen a reduction in the amount of Solar PV Array areas.
Landscape and Visual	Change: Additional land added to the Site Boundary Area to accommodate localised changes Sites: Land South of Site 2A, CRC 2, 5A, 7D / 7, Land north of Site 7D The document outlines that these changes will involve removal of vegetation. However, it is not clear what this means in terms of what extent of vegetation removal will be required. For example, is this mowing a roadside verge or is it wholesale removal of a hedgerow/trees? In some instances, areas of priority habitat may be affected and negative impacts on this must be avoided.	No	It is assumed these are land required for construction activities and the vegetation removal would be small in scale and include pruning of overhanging branches, as detailed in the **OCEMP [EN0110014/APP/7.1]**.
Ecology and Biodiversity	In addition, at Site 8A / Site 8B, the southern part of this is designated as a roadside nature reserve (RNR 9). Roadside Nature Reserves are locally designated sites and should be treated the same as a County Wildlife Site. As such, we would welcome further discussion with Developer about works in this area. The Environmental Impact report will need to be updated to reflect these changes and ensure that all impacts are properly assessed, alongside outlining any mitigation that will be required as a result of the changes.	Yes	An assessment of impacts upon Roadside Nature Reserves is provided in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**. Following the implementation of the above embedded mitigation measures, no direct effects are anticipated to partially on-site RNRs, resulting in a Negligible effect, which is not significant. The Applicant is open to further discussions with Norfolk Wildlife Trust in regard to works in this area.
Cumulative Impact	Although not part of this targeted consultation, we also note that there is still no assessment of the cumulative impact with the Tasway Energy Park which is proposed to adjoin East Pye Solar at the existing solar fields at Tasburgh.	No	Tasway Energy Park has been put on an indefinite pause.

2.6 Saxlingham Nethergate Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
General	Whilst East Pye Solar describes the proposed alterations as “minor and localised,” the PC considers the cumulative effect of these changes—particularly the increase in the boundaries of the proposal, the Abnormal Indivisible Load (AIL) routes, construction HGV access routes, increased capacity and height of the substation and additional photovoltaic arrays at Site 7D – to constitute material and significant changes to the scheme. The PC particularly endorses the BEPS view that for this reason the current consultation is unlawful. These revisions will cause substantial and unjustified harm to the historic, rural, and ecological character of Saxlingham Nethergate and Saxlingham Green and, in particular, their conservation areas.		The Applicant does not agree that the design refinements described constitute “material changes” in any statutory sense. The concept of “material” and “non-material” changes arises only following submission and acceptance of a Development Consent Order application for examination. At the pre-application stage, there is no fixed application to which the material change regime can apply. The Preliminary Environmental Information Report (PEIR) is a consultation document intended to present a snapshot of a developing design, and evolution of the Scheme between the PEIR and the submitted proposals is both anticipated and expressly provided for within the pre-application consultation regime under sections 42–47 of the Planning Act 2008 and relevant Planning Inspectorate guidance. The relevant test at pre-application stage is whether consultees have been afforded a fair opportunity to comment on the Scheme as proposed, rather than whether refinements constitute “material changes” in a statutory sense. The Applicant has undertaken targeted consultation in respect of the identified refinements, to ensure that consultees have been able to comment meaningfully on the proposals now being taken forward. The likely effects of the Scheme as proposed, including cumulative effects, are fully assessed within the **Environmental Statement [EN0110014/APP/6.1]**. Where likely significant effects are identified, appropriate mitigation is proposed to reduce these to not significant where possible.
Transport and Access	The Parish Council maintains that the existing rural lanes are entirely unsuitable for AIL and HGV use. They are narrow, lack footways, pass directly through residential areas, a primary school zone and two designated Conservation Areas.	Yes	Construction vehicle routeing has been designed to avoid sensitive receptors where possible, and to accommodate this appropriate mitigation and management measures have been identified in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11], Transport Assessment**

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	The proposed AIL vehicles – up to 45 m long, 5 m wide, and 150 tonnes in weight – would require verge removal, tree pruning, and signage dismantling. This is wholly incompatible with the Design Manual for Roads and Bridges (DMRB) standards and National Highways AIL Guidance (2023), both of which require pre-clearance routes that avoid protected or unsuitable areas. Under s.130 of the Highways Act 1980, the Highway Authority has a statutory duty to protect public rights and the safe use of highways; these proposals directly conflict with that duty.		**[EN0110014/APP/6.3.11.1],** and **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]**. The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. It uses A140, B1527 and B1332 as the feeder corridors for construction traffic to minimise the use of other local roads except for the final connection to the land parcels. Where feasible, the strategy uses internal haul routes, further to reduce the use of the existing local road network. That strategy avoids movements through communities, such as Saxlingham Nethergate, except for AIL movements if no alternative route options are available. The strategy uses roads that are not the subject of restrictions to standard legal vehicles. The Applicant is being advised by heavy haulage consultants which have reviewed the likely AIL routes for the associated equipment and materials. Those routes have been developed with engagement with NCC Highways and will be developed further when contractors and hauliers are appointed. Locations for alterations to the road network to facilitate the movement of AILs have been identified as part of the proposed Order Limits. Alterations will be agreed and approved with NCC when the final details of the movement for AILs are completed. The approval of the AIL transportation will be governed by the standard processes – with notification of the Movement Orders being made to the affected Local Highway Authorities, the police and affected structures owners. If directed by the police the AILs will be escorted as part of the managements of those journeys.
Transport and Access	The proposed AIL route from Poringland to Saxlingham Nethergate also has the potential to cause significant congestion and inconvenience to other users of the road and for this reason and the other reasons set out above is quite simply unacceptable.	No	The movement of AILs associated with transformers and cable drums will be governed by the standard processes – with notification of the Movement Orders being made to the affected Local Highway Authorities, the police and affected structures owners. As deemed necessary, trained escorts will be used – which could include police assistance. The timing and management of the movements will be dictated by the police and Local Highway Authority. Movements are typically schedules during periods which will

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			generate the least disruption to other road users and optimise safe travel for the public and those involved in moving the AIL. An assessment of AILs is detailed in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**, alongside proposed routeing maps detailed in **ES Volume 2, Figures 11.2 to Figure 11.8 Likely and Suitable Routes to the Scheme [EN0110014/APP/6.2.11.2-11.8]** and an AIL report detailed in **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]**. Management and mitigation measures associated with AILs is detailed in the **OCTMP [EN0110014/APP/7.6]**.
Transport and Access	The weight of the load, in excess of 150 tonnes, will be running adjacent to the stream alongside the Street (1m or less away) which feeds into the River Tas. The vertical side to the stream will be vulnerable to collapse and the load will also have to pass over under-road culverts entering and leaving the village. All the houses along The Street have under-road sewage pipes joining the main sewer which runs alongside the stream under the road.		Detailed checking of structures and road settings will be carried out in the final planning of access routes for AILs. This will be done in association with NCC Highways and other structures owners. The gross weight and axle loadings of the loads will be confirmed and where structural checks are required, these will be undertaken as part of the planning and governance of the routes. This information is set out in the **OCTMP [EN0110014/APP/7.6]** and **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]**.
Cultural Heritage	Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose on decision-makers a *positive duty* to preserve or enhance the character and appearance of Conservation Areas. We anticipate some 34 listed buildings will be directly affected by the AIL routing proposal and there are real fears of structural damage being caused to these buildings, many of which have no foundations, by vibration from the 45 x 5 metre transporter with its 150-ton load.	Yes	Potential impacts on designated and non-designated heritage assets arising from the AIL have been assessed within **ES Volume 3, Appendix 10.1 Heritage Statement [EN0110014/APP/6.3.10.1]** and it is considered that there will be no significant effects on any heritage asset. Although timber-framed buildings identified as potentially sensitive to the Scheme, these types of buildings in this region typically have foundations of flint, clay and lime mortar. There is no evidence that timber-framing is more susceptible to structural issues from construction nearby and indeed, both the Historic England and the Society for the Protection of Ancient Buildings note that timber-framed constructions are remarkably durable. The assessment has not identified any potential for swipes and strikes to heritage assets along the AIL routes and there is no reason to believe that additional traffic movements could have any direct impact upon these heritage assets (i.e. through vibration). It is worth noting that

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			the publication Evaluation and measurement for vibration in buildings – Part 2: Guide to damage levels from groundborne vibration (British Standard BS7385- 2:1993) states in paragraph 7.5.2: *A building of historical value should not (unless it is structurally unsound) be assumed to be more sensitive, and as such, the conclusions of the noise and vibration assessment undertaken in support of the Development Consent Order (DCO) application included as* **ES Volume 1, Chapter 10 - Transport and Access [EN0110014/APP/6.1.11]** applies regardless of a building's designation. Further information about cultural heritage can be found in **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**.
Cultural Heritage	The proposal to remove the hedge of the grade 2* listed building that runs adjacent to Church Hill through the village would also involve the removal of the wall which is also grade 2* listed and will have a devastating long-term effect on both the house and the conservation area.	No	Indicative locations of minor hedgerow works relating to access points and the Cable Route Corridor (CRC) are shown in Appendix A: Hedgerow Removal Plan of the **OLEMP [EN0110014/APP/7.4]**. These plans show both the temporary hedgerow works (pruning and removal) required during the construction phase for accesses, and also the removals that will be in place for the full operational lifetime of the Scheme. The Applicant does not intend to removal a hedge or a wall within the Conservation area stated. Further details on the methodology to be followed during hedgerow works covering the protection of retained hedgerows (pruning, widening, removal) are included in the **OCEMP [EN0110014/APP/7.1]**, whilst the approach for reinstatement/replanting is discussed within the **OLEMP [EN0110014/APP/7.4]** and will be detailed further within the LEMP secured by Requirement 7 of the **draft DCO [EN0110014/APP/3.1]**.
Cultural Heritage	The works proposed along the AIL route – tree and hedge removal, verge realignment, and night-time convoys through Saxlingham Green and Saxlingham Nethergate – would erode the defining historic street patterns and landscape enclosures that underpin their designation. The National Planning Policy Framework	No	The AILs will not necessitate the elements stated in this comment but could involve vegetation pruning, temporary removal and subsequent reinstatement of street furniture and temporary suspension of parking. The effects of these on the character and significance of the conservation area have been assessed within the **ES Volume 3, Appendix 10.1 – Heritage Statement**

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	(2023) further requires (paras 208-212) that *great weight* be given to the conservation of heritage assets and that *substantial harm* to such assets be *wholly exceptional*.		**[EN0110014/APP/6.3.10.1].** Any impact would be of an inherently short-lived and entirely reversible nature.
EIA Methodology	Under the EIA Regulations 2017 (Reg. 26), any modification likely to cause materially different environmental effects must be reassessed and subject to public consultation. The applicant's own *Change Note* acknowledges "potential impacts not assessed in the PEIR." These include: • new construction and traffic impacts from altered AIL and HGV routes; • vegetation clearance and verge works within Conservation Areas; and • additional landscape and noise effects arising from the enlarged substation and new solar arrays. The PC will therefore request that the Planning Inspectorate refuse to accept any DCO submission unless a revised Environmental Statement and Heritage Impact Assessment are provided and subject to full public consultation.	No	At the time of the receipt of this feedback from Saxlingham Nethergate Parish Council, an ES had not been published. As is standard with DCO Schemes, a PEIR serves to present preliminary environmental information findings. Construction and traffic assessments detailed at the ES stage can be found in **Outline Construction Traffic Management Plan [EN0110014/APP/7.6]**, **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** and associated **ES Volume 3, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1].** Matters in relation to Conservation areas are assessed in **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**, matters in relation to landscape are assessed in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]** and **Outline Landscape and Ecology Management Plan [EN0110014/APP/7.4]**. Matters in relation to noise are assessed in **ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]**. The **Heritage Statement [EN0110014/APP/6.3.10.1]** provides an assessment on identified heritage assets.
Ecology and Biodiversity	The proposed additional solar panels on Site 7D, together with vegetation clearance for AIL access, risk net biodiversity loss contrary to the Environment Act 2021 and Defra's 10% Biodiversity Net Gain requirement. Given the network of woods, ponds and drains nearby, there is potential impact on great crested newts and other protected species including Lapwings and the Barbastelle bat roosts and breeding area in Saxlingham Grove under	No	The DCO submission includes the provision of the **Biodiversity Net Gain Report [EN0110014/APP/7.23]** Schemes **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.24].** **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [EN0110014/APP/6.3.8.10]** provides specific mitigation / avoidance approaches.

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	the Habitats Regulations 2017. No evidence has been presented to show that suitable mitigation or compensation is achievable or been considered. The PC therefore seeks disclosure of a Biodiversity Net Gain calculation (Defra metric) and associated ecological surveys.		Matters in relation to habitat enhancements are assessed in the **OLEMP [EN0110014/APP/7.4]**.
Landscape and Visual	The South Norfolk Local Plan Policies DM 4.5 and DM 4.6 and the Norfolk County Council Landscape Character Assessment protect key rural vistas and landscape features. The expanded photovoltaic fields at Site 7D constitutes an extension of the industrial intrusion into an area defined by small-scale fields, hedgerows, and tranquil rural character. Under NPS EN-1 and NPS EN-3, cumulative impacts on landscape, heritage, and transport must be assessed; the PC submits that these cumulative effects now exceed the threshold of acceptability envisaged by those national policies.	No	No key vistas have been identified within the Study Area. The Scheme would introduce an increased level of human influence into a predominantly rural landscape, and the effects on landscape character are reported within the **ES Volume 3, Appendix 7.7 - Visual Assessment Table [EN0110014/APP/6.3.7.7].** A cumulative assessment has also been undertaken as part of the **ES Volume 1, Chapter 7 - Landscape and Visual [EN010168/APP/6.1.7]**.
Reasonable Alternatives and Design Evolution	The PC therefore formally requests that the applicant: • Suspends the current targeted consultation pending publication of a revised Environmental Statement, Heritage Impact Assessment, and Cumulative Landscape and Visual Impact Assessment before DCO submission. • Provides topographical survey drawings (at appropriate scale) for all works within or adjacent to Conservation Areas. • Removes or reroutes all AIL and HGV traffic from Saxlingham Nethergate, Saxlingham Green, and their Conservation Areas. • Supplies a Biodiversity Net Gain metric calculation demonstrating a minimum 10% gain.	Yes	The Applicant does not believe that this is necessary. The Applicant does not agree that the design refinements described constitute “material changes” in any statutory sense. The concept of “material” and “non-material” changes arises only following submission and acceptance of a Development Consent Order application for examination. At the pre-application stage, there is no fixed application to which the material change regime can apply. The Preliminary Environmental Information Report (PEIR) is a consultation document intended to present a snapshot of a developing design, and evolution of the Scheme between the PEIR and the submitted proposals is both anticipated and expressly provided for within the pre-application consultation regime under sections 42–47 of the Planning Act 2008 and relevant Planning Inspectorate guidance. Further information on how the Applicant has complied with all relevant legislation and guidance can be found in **the Consultation Report Appendix 1 - Statement of**

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	• Undertakes full and transparent re-consultation on these altered proposals prior to any DCO submission.		**Compliance [EN0110014/APP/5.2]** and the **Consultation Report [EN0110014/APP/5.1]**. The relevant test at pre-application stage is whether consultees have been afforded a fair opportunity to comment on the Scheme as proposed, rather than whether refinements constitute "material changes" in a statutory sense. The Applicant has undertaken targeted consultation in respect of the identified refinements, to ensure that consultees have been able to comment meaningfully on the proposals now being taken forward. The following figures are provided within the Application - • **ES Volume 2, Figure 7.3 - Topography Plan [EN0110014/APP/6.2.7.3] –** which shows the topography of the Site • **Works Plans [EN0110014/APP/2.3] -** which shows the maximum extent of works proposed within the DCO. • A **Biodiversity Net Gain Statutory Metric [EN0110014/APP/7.23]** is provided which demonstrates a minimum of 10% gain.
General	The PC supports the principle of renewable energy but cannot support a scheme that would irreversibly harm the historic environment, landscape quality, ecological integrity, and safety of our communities. The proposed changes described as "minor" are in fact material and significant, and they warrant a full reassessment under statutory environmental and planning frameworks. Until such evidence is provided and due process followed, Saxlingham Nethergate PC must object in the strongest possible terms to the East Pye Solar proposals as currently presented	No	The Scheme is temporary in nature. Decommissioning of the Scheme is anticipated to commence in 2091 and is expected to take approximately 12–24 months. At the end of the operational phase, all above-ground infrastructure — including Solar PV panels, mounting structures, cabling (excluding the Grid Connection Infrastructure), substations, BESS and ancillary buildings — would be removed and recycled or disposed of in accordance with good practice at that time. Foundations and below-ground infrastructure would be cut to 1.2m below ground level to enable future ploughing. The approach to decommissioning the Interconnecting and Grid Connection Cables will be determined in line with Government policy and good practice at the time. The current preferred approach is to leave

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			cables in situ to avoid environmental disturbance, although removal would remain an option. Following decommissioning, the land would be returned to the landowner. The majority of the Site would revert to its former agricultural use, although some established habitat and biodiversity features may be retained where appropriate. Permissive paths and community access would be removed as part of the decommissioning process. An **Outline Decommissioning Environmental Management Plan ODEMP) [EN0110014/APP/7.3]** has been submitted as part of the Application. It will be required to be submitted to and approved by the discharging authority prior to the commencement of decommissioning works. The detailed DEMP will include, as appropriate, a Traffic Management Plan and relevant Environmental Management measures for the decommissioning phase and will be prepared in consultation with the relevant authorities. Likely effects on designated heritage assets have been assessed in **ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10].** Embedded mitigation in the form of setbacks and landscape screening has been incorporated to minimise any impact on the conservation area, which are secured through the **Outline LEMP [EN0110014/APP/7.4]** and the **Works Plans [EN0110014/APP/2.3]**. As the Scheme is temporary, there is unlikely to be irreversible impacts on landscape quality – however, the National Grid Substation and grid connection infrastructure will remain following decommissioning. Based on representative viewpoint VL3/Site 1 in **ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7],** there would be a residual significant visual effect on residents at Great Moulton at this location. As assessed within **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8],** no significant effects have been identified therefore no irreversible harm is expected.

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			The following management plans, which are secured by DCO Requirement all contain measures relating to safety. • **Outline CEMP [EN0110014/APP/7.1]** • **Outline OEMP [EN0110014/APP/7.2]** • **Outline DEMP [EN0110014/APP/7.3]** • **Outline BSMP [EN0110014/APP/7.5]** • **Outline CTMP [EN0110014/APP/7.6]** • **Outline OTMP [EN0110014/APP/7.7]** • **Outline PROWPPMP [EN0110014/APP/7.8]** The Applicant does not agree that the design refinements described constitute “material changes” in any statutory sense. The concept of “material” and “non-material” changes arises only following submission and acceptance of a Development Consent Order application for examination. At the pre-application stage, there is no fixed application to which the material change regime can apply. The Applicant is of the belief that documents submitted as part of the full suite of DCO application documents present proportional and accurate surveys, assessments and environmental findings, to the best of their knowledge.

2.7 Seething Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and access	Of specific relevance to this targeted consultation are the points referencing: a) the unsuitability of Harvey Lane and Seething Road / Upgate Road for HGV tralic, which relate to carriageway width, soft verges and poor visibility; and b) that CRCs must not compromise uncultivated and / or ancient meadow or pasture, nor compromise established native hedgerow, woodland and ponds. It is therefore of considerable concern that Harvey Lane and Seething Road / Upgate Road are identified as HGV and AIL routes during proposed construction phases of the East Pye proposal. This has likely major negative impact upon agricultural and commercial businesses sited on Harvey Lane.	Yes	Construction vehicle routing has been designed to avoid sensitive receptors where possible, and to accommodate this appropriate mitigation and management measures have been identified in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** and **OCTMP [EN0110014/APP/7.6]**. The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. It uses A140, B1527 and B1332 as the feeder corridors for construction traffic to minimise the use of other local roads except for the final connection to the land parcels. Where feasible, the strategy uses internal haul routes, further to reduce the use of the existing local road network. That strategy avoids movements through communities such as Saxlingham Nethergate and Hempnall, except for AIL movements if no alternative route options are available. The strategy uses roads that are not the subject of restrictions to standard legal vehicles. The route of the cables have been defined in co-ordination with all technical disciplines. As such ecologists and landscape experts have advised on constraints associated with landscape parameters; and flora, fauna and species protections. The Applicant commits to providing before and after construction network condition surveys which will be used to monitor any extraordinary damage to access routes. That process will include an approach to rectify damage identified to have been caused by the construction traffic associated with the Scheme. Those condition surveys and remedial activities will be secured by the **OCTMP [EN0110014/APP/7.6]**. .
Ecology and biodiversity	Any such widening and vegetation removal would have considerable adverse ecological impact. Seething Parish Council highlight that the highway verges that bound the route (extending from the	Yes	The Applicant notes this.

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	Seething : Kirstead parish boundary, eastward along Harvey Lane and then north along Seething Road and Upgate Road to northern boundary of CRC 14) are populated by a large number of important native trees that must be protected from potential AIL or HGV damage. These trees comprise both mature (and very mature) trees alongside younger trees that are of equal importance - as such specimens provide our future mature tree populations.		As far as practicable, the Applicant will retain existing vegetation and avoid unnecessary vegetation removal. Any vegetation that is removed would be replaced with planting as close to the location, type and character of the existing vegetation, as far as reasonably practicable, to reduce effects resulting from such losses. The **Hedgerow and Tree Protection Order Plan [EN0110014/APP/2.10]** shows hedgerows that are included within the Scheme's Order Limits. Opportunities for hedgerow laying has been defined and set out in the **OLEMP, Appendix 2, Figure 2 - Green Infrastructure Strategy [EN0110014/APP/7.4]**. Tree removals will be avoided wherever practicable, should tree removal be unavoidable, trees of lower quality and life expectancy will be preferably removed over those of higher quality and life expectancy. Veteran trees will not be removed under any circumstances. This is detailed in the **OCEMP [EN0110014/APP/7.1]**.

2.8 South Norfolk Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Landscape and Visual	The proposed extents, and the reasons for, the proposed additions to the development boundary areas raise concerns that cannot be allayed without detailed information. Many of the locations included appear to have existing mature trees and I would not support the removal of these purely to achieve temporary constructional needs. Whilst all	Yes	**ES Volume 3, Appendix 7.10 - Preliminary Arboricultural Impact Assessment (AIA) [EN0110014/APP/6.3.7.10]** identifies a total of 737 tree features within the Order Limits. A search of the South Norfolk and Broadland District Council online search maps confirmed that 66 individual trees, three trees in G27, three trees in W11 and twenty-three unnamed trees, and one group of trees located either adjacent

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	potential tree loss merits scrutiny, particular concern is registered for the locations that are part or wholly within, or adjacent to the conservation areas of Saxlingham Green, Saxlingham Nethergate and Long Stratton. Hedgerows may be less of an issue, especially if they could be coppiced to achieved temporary clearances, then allowed to re-grow. Some of the locations' explanatory notes do not make it explicit as to whether the potential areas of vegetation removal are for the long-term operational accesses to the scheme. Where this is the case, then it needs to be demonstrated that the proposed access arrangements are sited in the least harmful way and that no (less harmful) alternative is possible.		to or in the Order Limits are protected by TPO. In addition, five individual trees, i.e. T445, T446, T447, T448 and T449, and three groups of trees, i.e. G106, G107 and one unnamed tree group, are located within Saxlingham Nethergate CA and Fritton CA. The AIA identifies that the majority of the tree resource which are located within the Order Limits will be protected during construction and operation of the Scheme through the **OCEMP [EN0110014/APP/7/1]** and the **OOEMP [EN0110014/APP/7.2]**. None of the trees identified above are for removal.
Cultural Heritage	It is good, with regard to the grade II listed building, Broadgate Way, to the southwest of Great Moulton that the National Grid substation is not going to be in the southwest corner close to that asset. However, being to the north in site 1B will place it in closer proximity to a number of designated heritage assets within Great Moulton which are currently characterised by backing onto or towards expansive rural open countryside to the south.	Yes	Potential effects on designated and non-designated heritage assets over the course of the Scheme have been assessed within **ES Volume 3, Appendix 10.1 Heritage Statement [EN0110014/APP/6.3.10.1]**. The conclusions of the assessment were that, following embedded mitigation, there will be no harm for the majority of designated and every non-designated heritage asset within the Study Area. Moulton Farmhouse and Barn Cottages are the only exceptions to this. Views of the former Grade II listed building from the footpath within Sub-Site 1B are of interest and illustrate the heritage asset's significance. These will be obscured by the Project Substation as part of the Scheme. Depending on the situation of the Project Substation within the BESS Site, there may also be visibility of taller elements of the structure from Barn Cottages, which will result in low adverse to negligible impact on a medium sensitivity asset. This would result in a minor adverse effect (equating to less than substantial harm at the lowest end of the scale) that is not significant. For Barn Cottages, this will be reduced to no harm once the landscaping screening has matured (expected to be approximately 30 years). As detailed in **ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10]**, the potential indirect impact of the Scheme on designated and non-designated heritage assets ranges from low to negligible,

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			with the scale of effects ranging from neutral to minor adverse, which are not significant.
Cultural Heritage	The size of the substation is proposed to change from 132 kV to 400 kV. There are no detailed details yet on the design, and it is a concern that this will also result in larger and a taller structure – the consultation has suggested that the height is increasing from 7m to 13m, however there are no details whether 13m will be the tallest element but only small part of the substation, or whether the station will have a volume and massing where 13m will be across a large part of the site. This is likely to be very visible and intrusive when seen within the setting of surrounding heritage assets particularly those to the north and Moulton Farmhouse to the east. The impact is yet to be assessed by the heritage consultants so more detailed required in order to assess heritage impact.	Yes	This has been noted and is assessed within the Heritage Statement appending the **ES Volume 1, Chapter 10: Cultural Heritage [EN01100141/APP/6.1.10].** As detailed in **ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**, the maximum height of the Project Substation in Site 1B is proposed to be 13m to the top of the busbars. The maximum compound area is 1.1 ha. Moulton Farmhouse and other heritage assets have been assessed as part of the Heritage Assessment, with the results contained within **ES Volume 3, Appendix 10.1 Heritage Statement [EN0110014/APP/6.3.10.1]**. Views of Moulton Farmhouse from the footpath within Sub-Site 1B are of interest and illustrate the heritage asset's significance. These will be obscured by the Project Substation as part of the Scheme. Depending on the situation of the Project Substation within the BESS Site, there may also be visibility of taller elements of the structure from Barn Cottages, which will result in low adverse to negligible impact on a medium sensitivity asset. This would result in a minor adverse effect (equating to less than substantial harm at the lowest end of the scale) that is not significant. For Barn Cottages, this will be reduced to no harm once the landscaping screening has matured (expected to be approximately 30 years). **As detailed in ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10]**, the potential indirect impact of the Scheme on designated and non-designated heritage assets ranges from low to negligible, with the scale of effects ranging from neutral to minor adverse, which are not significant.
Cultural Heritage	The suggestion of more panels in parcel 7D is likely to result in only relatively low level of harm to nearby designated heritage assets in terms of impact on their setting. There is potential for it be visible from the upper storeys of designated assets in Saxlingham Green (which is also a conservation area) but there is some physical detachment and possible mitigation in the field to	No	The Applicant agrees with this comment – the impact assessment included within **ES Volume 3, Appendix 10.1 Heritage Statement [EN0110014/APP/6.3.10.1]** did not identify any significant effects resulting from the AILs. This is addressed within the **ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.10].** There will be no long term or permanent changes to the appearance or character of either conservation area

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	the north however no details of what this may be have been provided yet. I note that "additional small areas of land throughout the Scheme to accommodate Abnormal Indivisible Loads (AILs) that could result in highway works, temporary removal of street furniture (benches, bins, bollards, etc.) and/or vegetation removal." Some of these areas are close to heritage assets, however my understanding is that with the nature of the changes this is unlikely to be result in such as significant change to the setting of a listed building to be considered significant in terms of effect. I am however concerned that a long stretch of road is marked for alterations through the villages of Saxlingham Nethergate and Saxlingham Green, which are conservation areas. There are no details as to what the alterations may entail, however the grass verges, vegetation and street furniture all contribute to the character and appearance of the conservation areas, so it is likely that proposals will have an impact on the conservation areas as a designated heritage asset. From the additional information provided, it is apparent that the location of the substation and BESS have now been decided. As such the Noise impact assessment needs to be updated to include the variation in plans. Additional information is also required for Air quality, and some changes are needed to the contaminated land specification. These are detailed in my previous comments and have not been addressed. As such I object to the application until		resulting from the AILs. These will likely required temporary traffic orders but any effects will be of negligible magnitude, temporary and ultimately wholly reversible.

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	such time as the issues that I raised have not been dealt with to my satisfaction. The above are my conclusions on the information provided in the available documentation. I note the comments provided by the consultant, that state that the BESS and Sub-station may have a Major Adverse effect. Based on my experience I consider that the proposed BESS and sub-station could significantly impact amenity such that it would be a Statutory Nuisance. As such unless significant mitigation can be proposed I would have no choice but to object to the project. Please note that the noise levels which I consider to be appropriate for the proposal to be emitting would be at or below background noise levels (LA90), which should be applied to all noise sensitive receptors.		

2.9 Stoke Holy Cross Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and Access	The proposed new routes and how East Pye Solar Ltd. intend to make it suitable for its purposes is poorly considered and inappropriate. No detail is provided with respect to the number of AILs, what damage they might cause to infrastructure, or indeed what process EPS will have in place to	No	Abnormal Indivisible Load (AIL) movements will be managed by a specialist haulage contractor to ensure safety and compliance. Traffic management arrangements will be agreed in advance with National Highways, relevant Local Highways Authorities, structures' owners and the Police where necessary. The Applicant will comply with the measures set out in **the Outline Construction Management Plan (OCEMP) [EN0110014/APP/7.6]**, which is

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	compensate communities for any damage caused.		secured via a Requirement in the **draft DCO [EN0110014/APP/3.1**], therefore breach of commitments would be a criminal offence. Individuals have recourse to usual legal processes in the case of any damage to private property. An assessment of AIL routes has been undertaken, involving liaising with National Highways. Outcomes have been reported in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** and **ES Volume 3, Appendix 11.1 - Traffic Assessment [EN0110014/APP/6.3.11.1]**. Suitable management and mitigation measures have also been identified in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11] and OCTMP [EN0110014/APP/7.6]**.
Consultation and Engagement	The recent announcement of these routes and the limited time residents in the newly affected areas is of concern. Many residents in affected parishes are completely unaware of the proposals and have not been given the time to consider them properly or comment.	No	Stoke Holy Cross Parish was identified as an additional parish hosting segments of the Scheme, with the addition of small increases to the Scheme boundary. The Applicant is confident that the targeted consultation carried out in November 2025 informed the community in a proportional manner. This included the publication of an Information Change Note on the Scheme website and communications sent via email to communicate the changes to the Scheme. This is evidenced in **Consultation Report Appendix 9 - Targeted Consultation Materials [EN0110014/APP/5.10]**.
Transport and Access	It is apparent that the proposed route is not suitable for the described vehicles, meaning there would need to be significant changes throughout the route, including Stoke Holy Cross. The AIL haulage units are wider than much of the current road on the route, higher than much of the hanging tree vegetation and too long to take the many turns without considerable unspecified verge damage, ditch filling together with hedgerow and tree removal.	Yes	An assessment of AIL routes has been undertaken, involving liaising with NH. Arrangements that the Applicant intends to comply with include planning and approval of the AIL routes with planning authorities, use of appropriate vehicle markings, plates and lighting, escorting of vehicles to the sites when required and implementation of temporary road closures if necessary to maintain road safety. Any damage to road surfaces and/PRoW will be repaired as soon as practicable.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	At 150 plus tonnes in weight (for comparison, maximum weight allowed for HGVs is less than 50 tonnes) damage caused by vehicle load increases exponentially such that a 20% increase in load increases damage by 50%, hence these AILs could massively increase the risk of damage to what are in truth minor country roads. They are likely to cause damage to bridges, the roads themselves, drains and other services running beneath them.		Outcomes have been reported in **the ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]**, **ES Volume 3, Appendix 11.1 - Traffic Assessment [EN0110014/APP/6.3.11.1]** and **OCTMP [EN0110014/APP/7.6]**. Suitable management and mitigation measures have also been identified in the **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** and the **OCTMP [EN0110014/APP/7.6]**.
Transport and Access	Removal of trees and hedges will permanently change the area. Obviously, road signs, railings and fences can be reinstated but trees and hedges will take years to recover and potential damage to infrastructure such as drains and the foundations of buildings might not come to light for some time and would be difficult to prove in a claim against EPS. There is genuine concern that should damage to property come to light, EPS might resist compensating residents leading to long, drawn out legal action for individual residents.	Yes	Tree removals will be avoided wherever practicable, should tree removal be unavoidable, trees of lower quality and life expectancy will be preferably removed over those of higher quality and life expectancy. Veteran trees will not be removed under any circumstances. This is detailed in the **Outline Construction Environmental Management Plan (OCEMP) [EN0110014/APP/7.1]**. A detailed version of this management plan will be implemented prior to the operational start of the Scheme, this is secured by a Requirement in the **draft DCO [EN0110014/APP/3.1]**. These mitigation measures are proposed to minimise risks of harm arising from the Scheme, any breach of the management plans secured via the draft DCO is a criminal offence.

2.10 Suffolk County Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and Access	3.12 The Council is concerned about traffic impacts and weight restrictions for Abnormal Loads on the A1145, A12 and A146. The Council understands that weight restrictions on bridges north of the site may require large loads such as transformers to be routed via the A140 to the south. Whilst accepting there is a notification process (ESDAL) this is a reactive, case-by-case method which does not proactively assess AIL routes.	No	The Applicant is aware of weight restriction constraints on the highway network. Final plans for routeing, including the use of the A140, will be secured through Articles and Requirements of the DCO including a Requirement to produce a CTMP confirming AIL routeing and management measures. Descriptions of proposed AIL routes have been reported in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**, alongside an AIL report detailed in **ES volume 3, Appendix 11.1 - Traffic Assessment [EN0110014/APP/6.3.11.1]**.
Transport and Access	3.14 The bridge on the A140 in Brockford requires overbridging to allow transformers to cross. Construction of the temporary bridge requires closure of the A140 for many hours, disrupting regional and local traffic. The latter typically does not follow approved diversion routes, causing disruption to communities adjacent to the A140. Frequent disruption to the A140 due to AIL movements associated with this and other NSIPs would, in the Council's view, necessitate investigation and repair of this and potentially other structures.		The Applicant is aware of this issue and will be taken into consideration in the final routeing and decision-making process. Final plans for routeing, including the use of the A140, will be secured through Articles and Requirements of the DCO including a Requirement to produce a CTMP confirming AIL routeing and management measures. An assessment of proposed AIL routes has been undertaken, and has been reported in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11],** alongside an AIL report detailed in **ES Volume 3, Appendix 11.1 -Traffic Assessment [EN0110014/APP/6.3.11.1]**. Suitable AIL management and mitigation measures have also been identified in the **OCTMP [EN0110014/APP/7.6**].

2.11 Shotesham Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and Access	Routing of HGVs on Market Lane We note the utter lack of clarity regarding this proposal. In particular we note the inconsistency of the HGV route map with the more detailed proposals in Change 22 in the Targeted Consultation Information Change Note. Neither document clearly shows the proposed entry points into sites or the routing of vehicles within the site, although material changes from the Statutory Consultation appear to be implied. The Parish Council has previously highlighted the inappropriateness of this area for solar panels. The proposal to use c300m of Market Lane for HGVs, causing considerable environmental harm and what should be considered as permanent changes to the landscape, simply adds weight to our earlier comments. The HGVs will be crossing site 8B to access the immediately adjacent site 8A. Vehicle routes should be established to minimise the impact on the environment and the community. This regularly floods with water too deep for traffic. Note the elevated footbridge when the stream is too deep to pass safely. alternative option would be to create an access from 8B to 8A crossing the narrow River Tas within the site network. No rationale for not considering this option has been put forward. HGVs may need to access this area during the operational and remediation phases of the project. Therefore, to suggest that impacts will be temporary is almost certainly incorrect.	Yes	The access strategy is set out in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**. **ES Volume 2, Figure 11.2 to Figure 11.8 [EN0110014/APP/6.2.11.2-11.8],** shows the Likely and Suitable Routes to the Scheme together with the **ES Volume 3, Appendix 11.1 - Transport Assessment (TA) [EN0110014/APP/6.3.11.1]** and the **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6].** The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. Where feasible, the construction strategy uses internal haul routes, to further reduce the use of the existing local road network. Permanent access to all parts of the Scheme will be designed into the detailed layouts. The **ES Chapter [EN0110014/APP/6.1.11]** and the **TA [EN0110014/APP/6.3.11.1] a**ssess both the construction period effects, the operational period effects and note that the decommissioning effects would be no worse than the construction period effects.
Ecology and Biodiversity	[Market Lane]. The following factors need to be explicitly considered: The environmental impact	Yes	Solar PV Panels closest to Market Lane have been removed from the Scheme.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	of removal of a mature stand of Oak trees and the proposed mitigation of this. Given the sloping nature of site 8B it is difficult to see how an appropriate junction can be created without removal of all or part of this high-quality group of trees. The impact on the Roadside Nature Reserve along Market Lane and the proposed mitigation for this.		As veteran trees (Including the mature stand of Oak trees referenced) are considered irreplaceable habitats, the replacement of these trees has been designed into the Scheme, and these features will be protected throughout construction (and the lifetime of the Scheme) where practicable. This is presented in the **Outline Construction Environmental Management Plan [EN0110014/APP/7.1].** The Scheme design has sought to retain existing hedgerow systems throughout the Order Limits. Also, the implementation of extensive 10m buffer zones surrounding field boundary hedgerows (extending to a minimum of 15m for individual trees and groups of trees) will allow for construction phase protection of hedgerows and enhancement of these linear features during the construction phase. These ecological buffers applied to the design of the Scheme are secured in the **Design Principles, Parameters, and Commitments** document **[EN0110014/APP/7.18]**. Hedgerow planting and other enhancement measures implemented during the construction period are detailed in the **OLEMP [EN0110014/APP/7.4]**, and the extensive areas of retained hedgerow are identified and protected via the implementation of the **OCEMP [EN0110014/APP/7.1].** Following their establishment, it is anticipated that the Scheme will result in a net-gain in hedgerows (and trees). Details of hedgerow losses and gains are provided in the **Biodiversity Net Gain Report [EN0110014/APP/7.26]** and ongoing management of these measures during the operational phase are provided within the **OLEMP [EN01100145/APP/7.4]** which aims to maximise the biodiversity value of retained and newly planted hedgerows in the long term. **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]** concludes that effects on Roadside Nature Reserves (including the one along Market Lane) are Not Significant. Standard measures to ensure run-off control, pollution prevention and construction phase dust impacts will be implemented through the **OCEMP [EN0110014/APP/7.1]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Water Environment	[Market Lane]. The following factors need to be explicitly considered: The high level of flood risk in the area.	Yes	Solar PV Arrays closest to Market Lane Farm have been removed. All electrical infrastructure is located outside of areas of Flood Zones 2 and 3 (including eastern combined fluvial/surface water flow route) and outside of the 1 in 1000 (0.1%) annual probability plus allowance for climate change floodplain. Electrical infrastructure has been located within areas of lowest surface water flood risk as far as practicable in accordance with the sequential approach. Some Solar PV Arrays are located within areas of higher surface water flood risk, however they are set at a suitable freeboard above the ground so as not to impede surface water flows and to be flood resilient. More details are set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment [EN0110014/APP/6.3.9.1]**.
Transport and Access	[Market Lane]. The following factors need to be explicitly considered: The weight bearing capability of the culvert over the River Tas to support HGV traffic.		The access strategy has been defined in consultation with Norfolk County Council as Local Highway Authority. **ES Volume 1 Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** and the **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]** set out the assessment of effects of transport and access on the road network during the construction and operational periods. Those documents indicate embedded and additional mitigation measures including those captured within **the OCTMP [EN0110014/APP/7.6],** the **Outline Public Rights of Way and Permissive Paths Management Plan [EN0110014/APP/7.8],** the **Outline Operational Traffic Management Plan [EN0110014/APP/7.7]** and other Management Plans. Those Management Plans are secured through Requirements in the DCO.
Transport and Access	[Market Lane]. The following factors need to be explicitly considered: The safety of pedestrians, cyclists and horse riders given the narrowness of the road and the lack of passing places.	Yes	Market Lane is not proposed for AIL movements. A small section of Market Lane is identified for use by construction vehicles as a link between Sub-Site 8A and Sub-Site 8B and the internal haul route within Sub-Site B.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			The **OCTMP [EN0110014/APP/7.6]** provides information on Temporary Traffic Management (TM) which will be needed during the construction of the Scheme to protect the integrity of the public highway and the safety of road users. TM measures could include the introduction of new passing places or improvement of existing passing places on the local road network to facilitate safe vehicle manoeuvring.
Transport and Access	The proposed routing of AILSs, potentially weighing up to 183te and between 60m and 70m in length, along 6miles of C roads and through rural communities, can be expected to cause substantial damage to transport infrastructure, environmental harm and damage to the cultural heritage of the communities which include many Conservation Areas and listed buildings. The consultation has provided no rationale for the proposed AIL routes or how any resulting harms would be mitigated. It is also notable that no swept path analysis has been provided for the key junctions, roundabouts and bends on the proposed routes.	Yes	The movement of AILs associated with transformers and cable drums will be governed by the standard processes – with notification of the Movement Orders being made to the affected Local Highway Authorities, the police and affected structures owners. As deemed necessary, trained escorts will be used – which could include police assistance. The timing and management of the movements will be dictated by the police and Local Highway Authority. Movements are typically schedules during periods which will generate the least disruption to other road users and optimise safe travel for the public and those involved in moving the AIL. An assessment of AIL routes has been undertaken. Outcomes have been reported in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11],** and **Volume 3, Appendix 11.1 - Traffic Assessment [EN0110014/APP/6.3.11.1]**. Suitable management and mitigation measures have also been identified in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11] and OCTMP [EN0110014/APP/7.6]**.
Transport and Access	The consultation states that highway widening may be required for AILs but fails to identify where any such work may be required. The majority of the route between the Railway Tavern in Poringland and Saxlingham Green constitutes quintessential South Norfolk villages and landscapes including part of the Tas Valley Landscape Character Area. Any widening of the road in these areas is likely to do irreversible harm to the character, appearance and local landscapes and create an overly urban feel to the area.	No	Existing access points will be improved where required to safely accommodate construction vehicles. As stated in the **OCTMP [EN0110014/APP/7.6]**, this may include widening and formalising entrances to ensure that vehicles can enter and exist in forward gear without risk to other road users. Visibility splays will be maintained clear of any obstructions for the duration of works to provide adequate sightlines. The Landscape and Visual Impact Assessment (presented in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7]**) concludes that construction effects are short-term and reversible, and occur as a result of increased activity, vehicle movements, temporary compounds, hedgerow loss, and temporary PRoW closures.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and Access	Specific issues that need to be addressed include: • The routing of AILs through the complex A47/A146/B1132 junction. • The proposed routing of AILs over Dunston Railway Bridge (OS Grid Ref: TG 22316 02845) despite this being identified as unsuitable for AILs in Appendix 11.4 of PEIR Volume III. • The ability of AILs to traverse the numerous roundabouts in Poringland. • A swept path analysis for the junction of Long Lane and Norwich Road in Stoke Holy Cross.	Yes	Engagement with National Highways regarding the movement of AILs associated with transformers and cable drums has been undertaken and will be governed by the standard processes – with notification of the Movement Orders being made to the affected Local Highway Authorities, the police and affected structures owners. As deemed necessary, trained escorts will be used – which could include police assistance. The timing and management of the movements will be dictated by the police and Local Highway Authority. Movements are typically schedules during periods which will generate the least disruption to other road users and optimise safe travel for the public and those involved in moving the AIL. An assessment of AIL routes has been undertaken. Outcomes have been reported in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11], volume 3, Appendix 11.1 - Traffic Assessment [EN0110014/APP/6.3.11.1]** and **Outline Construction Traffic Management Plan [EN0110014/APP/7.6]**. Suitable management and mitigation measures have also been identified in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11] and OCTMP [EN0110014/APP/7.6].** Further assessment of Dunston rail bridge has been undertaken as part of a wider assessment of AIL routes. Outcomes have been reported in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** and Volume **3, Appendix 11.1 - Traffic Assessment [EN0110014/APP/6.3.11.1**]. Suitable management and mitigation measures have also been identified in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11] and OCTMP [EN0110014/APP/7.6].** Concept site access design drawings for each access have been prepared based on the legal maximum sized vehicle (16.5m articulated HGV). Site access drawings, visibility splays and swept-path analysis is detailed in Appendix C: Site Access Drawings, Visibility Splays and Swept-Path Analysis of **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and Access	The impact of AILs on the use of Long Lane, Stoke Holy Cross on pedestrian users and cyclists. In the absence of a good footpath network Long Lane is frequently used as the only direct walking route between the two separate settlements within the village. Clear signs of its use can be seen on the narrow verges and field margins by the road.	Yes	The **Outline Public Rights of Way and Permissive Paths Management Plan (OPROWPPMP) [EN0110014/APP/7.8]** is included as part of the DCO Application. As part of this plan, the following measures will be implemented: • Where applicable, access tracks will be widened to allow vehicles to pass PRoW users safely; • Speeds to be limited to 5-10mph near PRoW; • Any damage to the surface of the PRoW directly attributable to the Scheme will be repaired as soon as practicable. As part of the Scheme, three new permissive paths are proposed to maintain and enhance public access. These permissive paths will complement the existing PRoW network, providing alternative routes for pedestrians. These new proposed permissive paths include: • One in Sub-Site 7F which will follow an existing informal track through the field, creating a continuous link between Saxlingham Nethergate FP27 and Saxlingham Nethergate FP9. This permissive path is shown in Figure 5.1 in Appendix A of the **OPROWPPMP [EN0110014/APP/7.8]** • One in Sub-Site 8B, where the path will start at Market Lane, pass through a field before connecting to Shotesham FP19, which crosses the central part of Sub-Site 8B. This new path will create a pedestrian link through the Sub-Site, providing access to FP22 from Shotesham FP19 to the south. As a result, pedestrians will only need to use the southern section of Market Lane rather than its full length, which currently offers limited accessibility due to the absence of continuous footways. This permissive path is shown in Figure 5.2 in Appendix A of the **OPROWPPMP [EN0110014/APP/7.8]** • One within Sub-Site 10B in parallel to Seething Road connecting Hedenham RB9 and Seething RB13 at the northern end to Wash Lane in the south. This permissive path is shown in Figure 5.3 in Appendix A of the **OPROWPPMP [EN0110014/APP/7.8]**.
Transport and Access	An analysis of the ability of AILs to traverse Skeets Hill in Shotesham. An analysis of the load	Yes	Concept site access design drawings for each access have been prepared based on the legal maximum sized vehicle (16.5m articulated HGV). Site access

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	bearing capability of the bridge over the Tas at Skeets Hill in Shotesham, and the culverts along this route.		drawings, visibility splays and swept-path analysis is detailed in Appendix C: Site Access Drawings, Visibility Splays and Swept-Path Analysis of **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]**.
Cultural Heritage	A full assessment of the impacts on the many listed buildings and Conservation Areas that are situated along the proposed route.	Yes	**ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10]** sets out any identified impacts to heritage assets along the HGV and AILs routes. The assessment has not identified any potential for swipes and strikes to heritage assets along these routes. Wherever possible, transportation routes have been identified to avoid additional traffic movements past sensitive heritage assets. Where this has not been practicable due to limited options of suitable routes, the construction traffic associated with the Scheme will be subject to measures and procedures to minimise impacts to heritage assets, which are secured within the **OCTMP [EN0110014/APP/7.6]**.
Transport and Access	Routing of HGVs on Littlebeck Lane, Mill Lane, Woodton Road, Honeypot Lane and Heath Road towards Sites 8A and 8B. As previously noted, this network of lanes is inappropriate for significant HGV use. The impact on other road users, whether car, cycle or pedestrian, will be unacceptable given the single-track roads, the poor visibility at junctions and the blind corners along this route. Safety considerations should dictate that access is provided by cross field haul routes.	Yes	Vehicle routeing has been designed to seek to avoid sensitive receptors where possible, and appropriate mitigation and management measures have been identified to accommodate this. **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** assesses impact on transport and access utilising IEMA guidelines. The guidance sets out thresholds and assessments for the following effects relevant to transport and access: severance, driver delay, pedestrian delay, non-motorised users, fear and intimidation, road safety and hazardous and large loads. Suitable management and mitigation measures have also been identified in the **OCTMP [EN0110014/APP/7.6]**.
Transport and Access	Proposed Change 23 appears to imply the permanent destruction of all or part of a mature hedge and a number of trees along Brooke Road, removing an area of ecological value that would provide some reasonable screening for the proposed solar farm. This part of the proposal does not seem to be thought through.	Yes	This area in question makes use of an existing field access on Brooke Road to site 8B. The area included is required to ensure the required visibility splay for the site vehicle access can be achieved and may require pruning or removal of some vegetation. Further information can be found in **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]**.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Transport and Access	Proper consideration needs to be given to: • The adequacy of the Littlebeck Lane/B1131, Woodton Road/Mill Lane and Woodton Road/Honeypit Lane/High Green junction for increased volumes of HGV traffic. • The ecological and biodiversity impacts of this routing. • The damage to roadside verges and drainage systems including drainage grips. • The impact on local residents, properties and other road users.	Yes	Vehicle routeing has been designed to seek to avoid sensitive receptors where possible, and appropriate mitigation and management measures have been identified to accommodate this. **ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]** assesses impact on transport and access utilising IEMA guidelines. The guidance sets out thresholds and assessments for the following effects relevant to transport and access: severance, driver delay, pedestrian delay, non-motorised users, fear and intimidation, road safety and hazardous and large loads. The **OCTMP [EN0110014/APP/7.6]** commits to pre and post road condition surveys. Any highway defects identified as resulting from construction vehicles activities associated with the Scheme will be rectified to the satisfaction of Norfolk County Council without any betterment to the pre-construction condition.
Transport and Access	A limited review of the consultation documentation has suggested a number of possible errors and omissions. For example: i) The inconsistency of the HGV route map with the more detailed proposals in Change 22 in the Targeted Consultation Information Change Note, as noted above. ii) The absence of clear site access points from all maps.	Yes	Information on vehicle routes and access points can be found in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** and **ES Volume 3, Appendix 11.1 Traffic Assessment [EN0110014/PP/6.3.11.1]**. Mitigation measures are secured in the **OCTMP [EN0110014/APP/7.6]**.
Transport and Access	iv) The total area of change identified for Proposed Chage 18 may be understated given the width of loads, turning circles and the narrowness of The Street to the North of the shaded area.	Yes	Change 18 is linked to AIL movements. An assessment of this can be found in in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** and **ES Volume 3, Appendix 11.1 Traffic Assessment [EN0110014/PP/6.3.11.1]**. Mitigation measures are secured in the **OCTMP [EN0110014/APP/7.6]**. The movement of AILs associated with transformers and cable drums will be governed by the standard processes – with notification of the Movement Orders being made to the affected Local Highway Authorities, the police and affected structures owners. As deemed necessary, trained escorts will be used – which could include police assistance. The timing and management of the movements will be dictated by the police and Local Highway

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			Authority. Movements are typically schedules during periods which will generate the least disruption to other road users and optimise safe travel for the public and those involved in moving the AIL.
Transport and Access	iii) Proposed change 20 suggests an area of 1,000 sq m is subject to change implying a depth of vegetation removal amounting to 30m along The Green, which is implausible and inconsistent with the map provided.	Yes	This area in question makes use of an existing field access on The Green to CRC 10. The area included is needed to ensure the required visibility splay for the site vehicle access can be achieved and may require pruning or removal of some vegetation. Further information can be found in **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]**.
Consultation and Engagement	From a limited review, it is deeply concerning to identify this number of errors and inconsistencies. We have material concerns about the adequacy and accuracy of this consultation. It appears to have been pulled together in limited time and without sufficient concern for accuracy or the needs of the consultation. As a Parish Council we do not have the resources to check all of the work undertaken by East Pye's consultants; unfortunately, it would seem that is also true of East Pye and its consultants. This is concerning and undermines the credibility of East Pye and this consultation.		The Applicant acknowledges these comments but remains confident in the level of consultation undertaken and information presented throughout the pre-application stage, as described in the **Consultation Report [EN0110014/APP/5.1]**. This includes accurate environmental assessments presented at all phases to the best knowledge of the Applicant. The Applicant acknowledges that the high volume of information presented at Consultation phases, however, this was proportional for the requirements of the Scheme under the Planning Act 2008. To improve accessibility, the consultation materials were made available on the Scheme website, and communications relations team were on hand to help address any questions. The Applicant welcomes further engagement with the Parish Council.

2.12 Woodton Parish Council

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Scheme Description	This consultation clearly and simply demonstrates the unsuitability of the sites proposed. Because the sites are scattered over a large area, the amount that needs to be done to make the sites accessible is multiplied and magnified. In other words, the cumulative damage caused will be far greater and impact more communities.	Yes	The cumulative impact of the Scheme is assessed throughout the **ES [EN01100141/APP/6.1]** and is summarised in **ES Volume 1, Chapter 20 – Residual Effects [EN0110014/APP/6.1.20]** the following significant cumulative effects have been identified: • Significant beneficial effect on water quality through the cessation of agricultural activities during operation; • Significant beneficial effect during construction decommissioning and operational phase on, jobs, employment and the supply chain, skills and the labour market, • Significant adverse effect during decommissioning on the loss of BMV land. • Significant adverse effect through hazardous waste from peak replacement scenario during operation.
Transport and Access	Woodton will be particularly impacted the proposed changes listed in sections 11 to 26, , which include; various lanes surrounding Hempnall, the Hempnall Road Roundabout, Fairstead Lane, The Krons, Shotesham Road, Saxlingham Seething, and closer to home, Woodton Road and Springwood. As a result, Woodton residents face considerable disruption in accessing local towns and villages for work, school, and shopping. In section 25 (Woodton Road, North of Springwood/Shotesham Road) the proposal indicates that the changes will take an additional 1.02 acres of land from the lane adjacent to a property which will already be surrounded by solar panels.	Yes	**ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** has considered construction vehicle routing and access proposals, alongside identifying appropriate management and mitigation measures in the **Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6]**. This includes a commitment that construction deliveries and collections by HGV will be scheduled to arrive and depart between 09.30 and 16.30 to avoid peak traffic periods. Vehicle routeing proposals and measures have been developed in consultation with NCC. Changes in traffic volumes and significance of effects have been assessed in line with IEMA guidance thresholds. In the Targeted Consultation Information Change Note (provided in **Consultation Report Appendix 9: Targeted Consultation Materials [EN0110014/APP/5.10]** the location 25 on Woodton Road shows an additional area of 1.02 acres. The development boundary area has been

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			increased to accommodate the potential for areas of vegetation pruning or removal along the highway. This will ensure there is sufficient visibility for vehicles to safely access the Site.
Transport and Access	The consultation proposes road closures, diversions and moving vehicles outside of rush hour to minimise impact. However, residents along those identified routes (and residents near those affected routes) in Woodton will have to live with late night or early morning heavy traffic and traffic using other roads, many of which do not have pedestrian pathways, that are not suitable for heavy load vehicles and higher traffic volumes.	Yes	The proposed construction working hours as shown below mean there will be no late night traffic generated by the development. Monday to Friday from 07:00 to 18:00 (daylight hours permitting); Saturday from 08:00 to 13:30 (daylight hours permitting); No Sunday or Bank Holiday working unless crucial to construction (for example, for trenchless crossings which must be continuous activity) or in an emergency. This is provided in the **OCTMP [EN0110014/APP/7.6]**.
Transport and Access	It is proposed that Abnormal Indivisible Load vehicle movements and construction traffic will be routed along Church Road, Woodton. This will cause prolonged disturbance and inconvenience to residents of Church Road, who already face years of noise, construction traffic, and disruption to their daily lives because of a substantial new housing development.	Yes	Church Road forms part of the B1527 and is considered a suitable route for HGV and AIL movements in the local area. An assessment of AIL routes has been undertaken. Outcomes have been reported in the **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**, and **ES Volume 3, Appendix 11.1 - Traffic Assessment [EN0110014/APP/6.3.11.1]**. Suitable management and mitigation measures for HGVs and AIL movements have also been identified in the **OTCMP [EN0110014/APP/7.6]**. This includes a commitment that construction deliveries and collections by HGV will be scheduled to arrive and depart between 09.30 and 16.30 to avoid peak traffic periods.
Ecology and Biodiversity	The consultation states that the Environmental Impact Assessment of this proposal does not have significant effects on the Preliminary Environmental Information Report. However, the additional removal of all the vegetation across the proposed areas (and no proposal to replace the removed vegetation or hedgerows) will undoubtedly have an adverse impact on wildlife habitats.	Yes	The Applicant can confirm that it does not intend to remove all the vegetation from the proposed areas consulted on during Targeted Consultation. As far as practicable, the Applicant will retain existing vegetation and avoid unnecessary vegetation removal. Any vegetation that is removed would be replaced with planting as close to the location, type and character of the existing vegetation, as far as reasonably practicable, to reduce effects resulting from such losses. Existing Hedgerow enhancement and improvement measures includes hedge laying, coppicing and infill planting. Details are shown in **Outline Landscape**

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			and Ecology Management Plan Appendix 2, Figure 2 - Green Infrastructure Strategy [EN0110014/APP/7.4]. The **Hedgerow and Tree Protection Order Plan [EN0110014/APP/2.10] shows** hedgerows that are included within the Scheme's Order Limits. Opportunities for hedgerow laying have been defined and set out in the **Outline Landscape and Ecological Management Plan (OLEMP) Appendix 2, Figure 2 - Green Infrastructure Strategy [EN0110014/APP/7.4]**. Tree removals will be avoided wherever practicable. Should tree removal be unavoidable, trees of lower quality and life expectancy will be sought to be removed over those of higher quality and life expectancy. Veteran trees will not be removed under any circumstances. These mitigation measures are all secured in the **OCEMP [EN0110014/APP/7.1]**.
Community Benefits	If granted it will result in significant and additional (arguably permanent) changes and harm to our countryside. There is clearly no thought or empathy given to residents in these proposed changes, which make the attempts at mitigation very harmful to the lives of all the communities of South Norfolk who will be affected by these proposals for decades. Finally, there will be no direct benefit to us as the electricity is going to be routed to London whilst we will have to put up with the disruption.	No	The Applicant respectfully disagrees and can confirm its commitment to ensuring that communities benefit from the Scheme, including by receiving direct funding to important causes in the local area. As a low-cost form of generation, if the Scheme is connected to the electricity transmission network, it will contribute to lowering the cost of energy for all, including locally. During the development of the Scheme, the Applicant consulted on community benefits and will continue to engage locally to shape a Community Benefit Fund that works for the community. Furthermore, **ES Volume 1, Chapter 15 – Socio-Economics [EN0110014/APP/6.1.14]** identifies that the the Scheme is expected to generate 360 net construction jobs over 24 months, accounting for displacement and multiplier effects. This employment creation, though identified as beneficial, is not considered to be significant in EIA terms given the relatively short period of construction. In addition, there would be an increase in local employment arising from both indirect and induced effects of the construction activity. Employment growth is anticipated to arise locally through suppliers to the construction process as a result of additional spending within the local supply chains.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
			Other benefits of the Scheme include: • Connectivity and public access improvements, including three new permissive paths and enhancements to the local PRoW network. • Local recruitment and procurement and supporting local education and skills uplifting, including promotion of apprenticeship schemes, workforce training and STEM education initiatives. • Ecological and landscape enhancement, including creating additional areas of hedgerow (including infilling existing hedgerow), grassland, and woodland planting. • Significant BNG contributions and habitat creation/enhancement, including commuting corridors and wetland areas for ground nesting birds. • Retention and enhancement of watercourses, ponds, and ditches, including providing connectivity for species such as otter, water vole and amphibians. • Installation of habitat features, including bird and bat boxes.

2.13 Natural England

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
Soils and Agriculture	Natural England refer you to the advice provided in our letter dated 10 February 2025 (our ref 499672, paragraph 14.4), "The Agricultural Land Classification (ALC) survey should be used to inform the final design of the project and inform micro-siting of infrastructure such as the Battery Energy Storage System (BESS) to avoid Best and Most Versatile land (BMV). The Environmental	No	The detailed ALC has been completed, this is evidenced in **ES Volume 3, Appendix 15.1 Agricultural Land Classification [EN0110014/APP/6.3.15.1]**. As described **in ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15]**, the NG Substation and BESS are located in that area for technical reasons and avoidance of Grade 2 land was not possible. for technical reasons. The ALC results and micro-siting are described in Section 15.8.

Theme	Comment	Has this resulted in a change to the Scheme or further addressed by the Applicant's application?	Applicant Response
	Statement should then set out details of how any adverse impacts on BMV agricultural land have been minimised through site design/masterplan". We advise that this is considered through the early stages of the schemes design. If peat soils have been identified and if they have been found within the draft order limits, these areas should be avoided.		No peat soils were identified that would be affected.
Ecology and Biodiversity	2. Additional solar panel area in site 7 D and localised changes to highways Potential impacts to designated sites from the additional panels and the localised highway changes need to be considered as part of the Environmental Statement. Natural England refer you to our letter dated 5 August 2025 (our ref 516274, section 2.2, 2.3 and 2.4) in regard to Shotesham Woodton Hornbeam Woods Site of Special Scientific Interest (SSSI), Pulham Market Big Wood SSSI and Fritton Common SSSI. As requested previously, a SSSI assessment is required to rule out air and water quality impacts to the sites' features. Natural England also refer you to our previous letter (our ref 516274, 5 August 2025, section 3), in regard to ancient woodlands and impacts during construction, and measures that will need to be considered for the additional areas and grid substation.	Yes	An assessment of direct and indirect impacts upon statutory and non-statutory designated sites as a result of highways potential impacts from localised highway changes is provided within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**.