

Chapter 4: Scheme Description — Summary

Chapter 4 addresses a foundational question for the Examination: what development would the draft DCO actually authorise? BEPS's central objection is that the application does not yet provide a single, complete and legally reliable description of the Scheme. Material parameters are dispersed across the Environmental Statement, Works Plans, Land Plans, Design Principles, outline management plans and draft DCO, while important components remain subject to broad flexibility. The resulting risk is that the development ultimately constructed could differ materially from the development assessed in the Environmental Statement.

BEPS does not object to legitimate detailed-design flexibility. A Rochdale Envelope may lawfully permit later selection between equipment or layouts where the essential development is settled, the maximum environmental parameters are defined, the realistic worst case has been assessed and the DCO prevents effects exceeding those assessed. The difficulty here is that uncertainty extends beyond equipment selection to the identity, necessity, location, configuration, delivery and severability of essential works.

The Scheme is extensive and industrial in character. It includes dispersed solar development, fixed or tracking panels, a BESS, up to six project substations, a new National Grid substation, overhead-line and pylon works, fourteen cable corridors, construction compounds, access and highway works, repeated equipment replacement and permanent infrastructure remaining after solar decommissioning. Yet there is no consolidated schedule fixing the maximum generating capacity, total equipment quantities, BESS capacity and duration, battery chemistry, enclosure numbers, substation configurations, transformer oil inventories, cable-circuit numbers, compound footprints or the full quantities associated with construction.

The BESS is particularly underdefined. Although relied upon as an integral storage and balancing component, its MW and MWh capacity, duration, chemistry, enclosure number, stored energy, heat output, transformer and inverter numbers, noise envelope and worst-case firewater requirement are not fixed. The application also permits grid charging, meaning the BESS may operate independently of East Pye's solar generation. At the same time, solar has a different connections-reform position from the BESS. The DCO must therefore be tested for solar-only construction, delayed or reduced BESS, partial build-out and other severed implementation scenarios. Claimed BESS benefits should not support the need case unless delivery of the BESS is secured.

The proposed National Grid substation is also not a confirmed final connection solution. The application seeks consent and compulsory powers for a six-hectare substation at Site 1B, associated 400 kV infrastructure and pylons of up to 61 metres. NGET's position, however, is that the final location, scale and design remain subject to

wider network, regulatory and commercial considerations; that other Gate 2 projects may affect the required solution; and that consent would not oblige NGET to use the proposed substation. The application does not clearly allocate responsibility for design approval, construction, ownership, operation, drainage, mitigation, maintenance and decommissioning between the Applicant and NGET. Consent should not be granted for compulsory acquisition or construction of infrastructure that may not be required, adopted or used.

Material design changes also occurred after statutory consultation. These included movement of the National Grid substation, expansion of its envelope, relocation and upgrade of the Site 1B project substation from 132 kV to 400 kV, an increase in its maximum height to 15 metres, taller pylons, additional land, additional panels and revised traffic and AIL arrangements. The Applicant did not issue a revised PEIR and largely relied on assertions that significance conclusions remained unchanged. A chapter-by-chapter audit is required to establish whether the final design—not an earlier or smaller iteration—was assessed for landscape, heritage, noise, aviation, hydrology, ecology, transport, fire and cumulative effects.

The cable and construction descriptions are similarly incomplete. Cable routes may be selected anywhere within broad corridors, but the maximum number of circuits, trenches, joint bays, widened working areas, HDD operations, dewatering volumes and permanent retained infrastructure are not consolidated. Construction assumptions omit complete scheme-wide maxima for simultaneous work fronts, piling, concrete, excavation, spoil, compounds, haul roads, lighting, out-of-hours activity and waste. A complete end-to-end AIL route to each major substation and BESS destination has not been established, while both National Highways and Norfolk County Council identify unresolved routeing and highway constraints.

The mapping does not provide a consistently reliable geographical control. Norfolk County Council identified outdated plans that omitted the operational Long Stratton Bypass, while inconsistencies remain between the Works Plans, Land Plans, access plans, environmental figures and construction routes. Where certified plans define the geographical scope of DCO powers, outdated or inconsistent mapping is not a minor presentational defect.

Whole-life effects are also understated. The Applicant anticipates complete solar-panel replacement over 12–24 months, up to five BESS replacement cycles and transformer replacement, but the associated traffic, waste, noise, fire, soil and ecological effects are not comprehensively controlled. After the nominal 60-year solar life, the National Grid substation, pylons, overhead-line works, cables, ducts, joint bays, foundations, access and drainage may remain permanently. The Scheme cannot therefore be characterised simply as temporary development.

The cumulative consequence is that the authorised development, assessed development and deliverable development have not yet been shown to be the same. BEPS requests a consolidated maximum-design-parameters schedule; corrected and reconciled plans; a works, ownership and responsibility matrix; confirmation of the final NGET connection solution; full solar/BESS severability analysis; quantified construction, cable and replacement schedules; a definitive permanent-retention and decommissioning schedule; and DCO controls preventing unassessed or unnecessary works. Unless those matters are resolved during Examination, the Environmental Statement cannot be relied upon as an assessment of the full development authorised by the Order, compulsory acquisition cannot be justified, and consent should be refused.

Chapter 5: Reasonable Alternatives and Design Evolution — Summary

Chapter 5 challenges the Applicant's alternatives assessment on the basis that East Pye was selected principally because sufficient land could be secured from willing landowners, rather than because the location had confirmed grid capacity or represented the least environmentally harmful option. The assessment was then structured to preserve a predetermined 500 MW solar-and-storage project rather than to test openly whether a smaller, differently configured or entirely different development would be preferable.

The chronology is central. The Applicant initially assumed a connection at Norwich Main and adopted a 20 km search radius around that substation. It searched within that area for willing landowners and secured enough land for the Scheme. Only subsequently did NGET confirm that Norwich Main had neither sufficient capacity nor any opportunity for expansion to accommodate a 500 MW project. The land package was therefore assembled before a viable grid connection had been established.

When Norwich Main failed, the Applicant did not restart the site-selection exercise. It retained the land already assembled and searched southwards along the Bramford–Norwich 400 kV line for a new point of connection capable of serving it. The Great Moulton search was limited partly because the Applicant preferred a substation location close to those pre-identified sites. Siting Zone 3, including the Yaxley area, was accepted as potentially reasonable but treated as less preferable because it was further from the land already secured. Great Moulton was therefore not demonstrated to be the strategically or environmentally optimum substation location; it was the location that best preserved the Applicant's existing land interests.

Land availability operated as a decisive threshold criterion. The Applicant sought approximately 1,100 hectares, preferred as few ownerships as possible and secured Sites 1–10 and the BESS site through voluntary agreements. Potentially suitable Alternative Development Zones were not pursued because sufficient land had not been

made available, and land south of Station Road was rejected because a willing landowner was not forthcoming. Land availability may be relevant to commercial feasibility, but the Applicant repeatedly treated “not available voluntarily to this developer” as equivalent to “not a reasonable alternative.” That conflates land control with environmental suitability.

The process was not ecologically led. The Applicant applied broad filters to avoid the direct footprint of internationally and nationally designated sites, but the Scheme remains spread across a connected ecological landscape involving ancient woodland, County Wildlife Sites, bat routes, ponds, hedgerows, watercourses, chalk-stream catchments, rare flora and established stewardship habitat. Many ecological constraints were addressed only later through buffers, offsets, habitat corridors and mitigation. Avoiding a statutory designation is not the same as selecting the least ecologically harmful location.

The treatment of agricultural land shows how environmental criteria were relaxed to preserve the preferred project. BMV land was initially treated as a constraint, but Grade 3 land was reintroduced when insufficient land remained to accommodate the 500 MW Scheme. The final proposal includes approximately 829.1 hectares of BMV land, around 78.7% of the solar sites. The Applicant did not undertake a renewed strategic search when detailed surveys revealed the true agricultural quality of the land; it retained the Scheme and made only limited local removals.

The scale of the project was fixed before alternatives were assessed. The Applicant began with a 500 MW connection requirement and calculated that approximately 1,100 hectares would be needed for the panels and associated infrastructure. Alternatives were then judged according to whether they could reproduce that entire project. Brownfield land was rejected because no single site could accommodate 500 MW; rooftops were rejected because assembling sufficient roof space would be complex; smaller projects were rejected because they would produce less than 500 MW; alternative land was rejected unless enough acreage was available; and “do nothing” was rejected because it would deliver none of the Applicant’s preferred output. That is not meaningful consideration of alternatives in size, scale or configuration.

The Applicant should have assessed a materially smaller scheme, removal of the most environmentally harmful sites, a compact scheme closer to the actual point of connection, a lower-capacity connection, phased development, solar without BESS, delayed or reduced BESS, deployment through less harmful projects or regions, and no development.

The regional need evidence also weakens the justification for East Pye. National policy establishes a strong general need for low-carbon infrastructure, but the Applicant has not shown that a further 500 MW transmission-connected solar project is required in

South Norfolk or T7 East Anglia. The published T7 combined solar figure for 2035 is 3,300 MW, while the transmission-only figure is 900 MW. Current Gate 2 solar in T7 totals approximately 2,241.6 MW, and BEPS estimates the wider planning, consented and under-construction solar pipeline at approximately 4,015 MW. The transmission position is particularly significant because East Pye is a transmission-scale project requiring a new National Grid substation and extensive connection infrastructure.

Those figures are not absolute planning caps, but they are relevant to whether East Pye is strategically necessary. The Applicant has not identified what regional deficit would arise if the Scheme were refused, which existing projects are assumed not to proceed, or why East Pye should be preferred over less harmful schemes or regions with a greater identified requirement. It cannot rely on speculative attrition or “optionality” while requiring South Norfolk to bear the environmental cost.

The BESS does not cure that absence of a solar need case. The solar and storage components have different connection and Gate positions, and the BESS has not been shown to have an equivalent secured Gate 2 status. The Applicant has not assessed solar-only, delayed-BESS or reduced-BESS scenarios, notwithstanding that the BESS may be severable and that T7 battery capacity is itself heavily oversubscribed.

The environmental consequences make the null alternative especially important. East Pye would occupy extensive BMV land, fragment ecological networks, affect ancient woodland, protected species, water resources, private water supplies, heritage settings, tranquillity, public rights of way, constrained rural roads and aviation interests, and create a new grid-infrastructure cluster at Great Moulton. Where those harms are extensive and no regional shortfall has been demonstrated, “do nothing” is not unrealistic. It is an environmentally beneficial and strategically rational alternative.

Design evolution does not cure the defect. Panel removals, larger buffers and mitigation may reduce some local impacts, but they do not alter the fact that the land was assembled before the grid position was resolved, the Scheme remains dispersed and predominantly on BMV land, the Great Moulton infrastructure cluster remains, ecological networks remain affected, and no serious reduced-scale or no-development alternative was assessed.

BEPS therefore requests a consolidated supplementary alternatives assessment reconstructing the full chronology of land assembly and grid selection; separating land availability from environmental suitability; disclosing the scoring and weighting applied to all solar and substation options; testing reduced-scale, compact, phased, solar-only, BESS-deferred and no-development alternatives; and providing a current comparison with T7 solar, transmission and Gate 2 capacity. Unless that exercise demonstrates both a genuine regional need for East Pye and a defensible environmental basis for selecting this land, the “do nothing” alternative should be preferred and the application refused.

Chapter 8: Ecology and Biodiversity — Summary

Chapter 8 concludes that East Pye Solar has not been shown to be ecologically acceptable or capable of being lawfully delivered. The Scheme is proposed across a connected South Norfolk Claylands ecological system containing ancient woodland, County Wildlife Sites, mature hedgerows, ponds, watercourses, stewardship land and habitats supporting protected and priority species. The Applicant's assessment treats many of these features as separate receptors within individual parcels, whereas their ecological value depends upon landscape-scale connectivity, hydrology, darkness, tranquillity and continuing agricultural management.

The ecological baseline is incomplete. Important botanical, aquatic and protected-species evidence was absent, incomplete or gathered under conditions that limited its reliability. The Applicant did not complete a sufficiently comprehensive botanical assessment of the Scheme area before consultation, despite evidence of rare arable plants, species-rich verges, lowland meadow interest and other locally important assemblages. Aquatic assessment relied substantially on desk evidence, habitat inference and surveys affected by dry conditions, without adequate direct sampling of connected watercourses and downstream receptors. Evidence concerning bats, birds, trees, great crested newts, water voles, otters, badgers, reptiles and invertebrates also remains incomplete in important respects.

The Scheme lies within an ecological landscape of national importance for bats. The Applicant itself identifies the bat assemblage as nationally important. The area supports confirmed and predicted barbastelle maternity colonies, overlapping Core Sustenance Zones, ancient-woodland roost networks, commuting routes and extensive supporting foraging habitat. Barbastelles are particularly dependent on dark, structurally connected landscapes. The Scheme would introduce fencing, tracks, substations, lighting, construction disturbance and extensive solar infrastructure across the land connecting woodland roosts and foraging areas.

The Applicant has not demonstrated that buffers around woodland and hedgerows would maintain the ecological function of this maternity-colony landscape. Evidence reviewed in Chapter 8 indicates that solar development may alter bat activity and prey availability, while construction noise, vibration, lighting and repeated habitat severance may disrupt commuting and foraging behaviour. The issue is not confined to direct loss of a roost. Functional degradation of the supporting landscape may engage the European Protected Species licensing regime.

Ancient woodland is another central constraint. Six ancient woodlands directly adjoin the Scheme, alongside ancient and veteran trees and a wider woodland network. The Applicant relies heavily on stand-off buffers, but those buffers do not address all indirect effects. Construction disturbance, lighting, dust, hydrological change,

increased edge effects, enclosure by infrastructure, reduced connectivity and long-term changes in surrounding land management may affect woodland function despite the absence of direct development within the mapped woodland boundary. Ancient woodland and veteran trees are irreplaceable habitats, and Biodiversity Net Gain cannot compensate for harm to them.

The water environment is integral to the ecology case. The Scheme affects the River Tas, Hempnall Beck, Waveney-linked systems and connected ditches and tributaries. Chapter 8 records evidence of a breeding white-clawed crayfish population in the River Tas system which was not adequately reflected in the Applicant's baseline. Construction runoff, sediment mobilisation, pollution, watercourse crossings, cable trenching and HDD operations could affect downstream habitat. The connected nature of the catchments means that parcel-by-parcel assessment is insufficient.

The Scheme would also affect rare and locally important botanical communities in arable margins, roadside verges, Roadside Nature Reserves, hedgerows and cable corridors. Highway widening, visibility splays, access works, trenching and vegetation removal may damage habitat outside the permanent panel footprint. These impacts are especially important because the transport strategy remains unresolved and may require additional road and verge works not fully assessed in the ecological documents.

Breeding and wintering birds would be affected through the loss and fragmentation of farmland habitat, including land already managed under Countryside Stewardship. The Applicant's reliance on grassland beneath panels and future habitat creation does not demonstrate functional equivalence for skylarks and other ground-nesting or open-land species. Land currently managed to provide feeding and nesting conditions may cease to perform that function once occupied by panels, tracks, fencing and regular operational activity.

Construction effects extend substantially beyond the permanent infrastructure footprint. They include piling, deep foundations, trenching, HDD, vegetation removal, compounds, haul roads, road widening, construction lighting, noise, vibration, dust, soil compaction, watercourse crossings and accidental pollution. These activities would occur across multiple sites and ecological networks and could overlap in time. The Applicant's reliance on later Construction Environmental Management Plans does not replace the need to assess the full likely construction footprint and effects at application stage.

Whole-life ecological effects are also insufficiently addressed. The Scheme would operate for approximately 60 years, with complete panel replacement, repeated BESS replacement and eventual decommissioning. Replacement could create a second major disturbance phase, while decommissioning may damage habitats created or relied upon as mitigation during operation. The application does not secure a complete

whole-life ecological strategy demonstrating that mitigation, habitat connectivity and protected-species safeguards would remain effective throughout construction, operation, replacement and decommissioning.

The Biodiversity Net Gain case does not determine ecological acceptability. Chapter 8 raises concerns about baseline valuation, the assumed condition of future habitats, the treatment of hedgerows and watercourses, durability and the effect of decommissioning. BNG cannot compensate for irreplaceable habitats, protected-species offences, hydrological deterioration, loss of maternity-colony supporting function, displacement of rare species or destruction of established stewardship habitat. A numerical net gain does not answer whether the mitigation hierarchy has been followed.

The outline Landscape and Ecological Management Plan, protected-species strategies, lighting controls and other management documents remain frameworks rather than final mitigation. Their effectiveness depends on later surveys, detailed design, land management, monitoring and enforcement. Mitigation cannot lawfully be deferred where the evidence is presently insufficient to determine whether significant effects can be avoided or whether protected-species licences are realistically obtainable.

The Habitats Regulations and European Protected Species implications remain unresolved. The Applicant has not demonstrated a clear route through the three licensing tests of imperative reasons of overriding public interest, no satisfactory alternative and maintenance of favourable conservation status. That difficulty is heightened by the absence of demonstrated regional need for East Pye and the availability of less harmful alternatives, including reduced development or non-development. The Examining Authority must be satisfied that the relevant licences are likely to be granted; they cannot be assumed.

The cumulative assessment is also inadequate. The Scheme's own parcels interact with one another across connected habitats and catchments, while other solar, BESS, transmission and development projects affect the same ecological network. Point mapping and separate receptor assessments do not capture the combined effects of habitat loss, lighting, disturbance, fencing, hydrological pathways and progressive industrialisation.

The mitigation hierarchy has not been properly applied. Avoidance was not achieved because the Scheme remains spread across the sensitive ecological network. Minimisation through buffers and local panel removals does not prevent landscape-scale fragmentation. Restoration cannot provide immediate functional equivalence for ancient woodland settings, mature hedgerows, established bat routes or rare botanical assemblages. Compensation and BNG cannot overcome protected-species offences or the loss of irreplaceable and functionally important habitat.

The proper avoidance response is therefore not minor micro-siting within the same ecological system. It requires substantial removal of development areas, relocation to a less sensitive landscape or refusal of the Scheme as presently conceived.

BEPS seeks refusal as the primary remedy. At minimum, no recommendation for consent should be made without a complete botanical and aquatic baseline; further bat and protected-species surveys; a landscape-scale functional connectivity assessment; updated hydrological and catchment analysis; a lawful HRA and credible EPS licensing case; full construction, replacement and decommissioning assessment; corrected BNG calculations; and binding, enforceable ecological controls. On the present evidence, the Applicant has not demonstrated that the Scheme can avoid unacceptable ecological harm or satisfy the necessary legal tests.

Chapter 11: Transport, Access and Scheme Deliverability — Summary

Chapter 11 concludes that transport is not a secondary mitigation issue but a project-critical test of whether East Pye Solar can physically be constructed. The Scheme depends upon an extensive, interconnected system of public-road routes, site accesses, internal haul roads, cable corridors, construction compounds, passing places, traffic controls and abnormal-load routes. On the evidence presently available, that system is neither agreed with the relevant highway authorities nor demonstrated to be available, environmentally acceptable and capable of accommodating the proposed construction programme.

The Applicant's submitted transport strategy is not supported by Norfolk County Council as local highway authority. NCC rejects significant elements of the proposed use of narrow rural lanes and requires construction traffic to rely more heavily on B roads and internal haul routes. The difficulty is that the Applicant's environmental assessment and traffic forecasts are based substantially on the route network it originally proposed, not on the materially different strategy now required by NCC.

The alternative strategy cannot be treated as a minor refinement to the Construction Traffic Management Plan. It may require long new or intensified internal haul routes, additional road crossings, watercourse and ditch crossings, hedgerow removal, drainage works, land rights and interactions with public rights of way and ecological receptors. The Applicant has not shown that all necessary routes lie within the Order Limits, are under its control or have been assessed for their landscape, ecological, heritage, drainage and agricultural effects.

Sites 7–10 present the clearest example. NCC requires Sites 7–9 to be served through CRC8 west of Hempnall and then by internal haul routes to widely separated parcels. The Applicant's submitted strategy instead distributes traffic through The Krons,

Fairstead Lane, Shotesham Road, Woodton Road, Fylands Road, Bussey's Loke, Heath Road, Baxter's Lane, Market Lane and Littlebeck Lane. A consolidated CRC8 route would therefore be a materially different construction system crossing open countryside, rights of way, hedgerows, drainage features and potentially Hempnall Beck. Its engineering feasibility, environmental effects, land requirements and route capacity have not been established.

For Sites 10A–10E, NCC requires greater consolidation through Harvey Lane and CRC14 rather than the Applicant's multiple-access strategy. Again, the Applicant has not demonstrated the complete internal route, road crossings, land rights or environmental consequences. Sites 7–10 therefore remain without a settled and deliverable access solution.

Hall Lane illustrates the unresolved conflict between the final application and the highway authority's position. The Applicant continued to rely on routes which NCC considers unsuitable or unacceptable. Similar concerns arise in relation to Fairstead Lane and other minor roads whose width, alignment, verges, drainage, structures and residential or heritage context are not suited to sustained construction HGV traffic.

The mitigation proposed by the Applicant is itself evidence of the severity of the constraints. Call-forward systems, holding compounds, one-HGV-at-a-time release, marshals, temporary traffic signals, vehicle-length restrictions, passing places, temporary speed limits, restricted delivery periods and left-in/left-out arrangements may help manage traffic on an otherwise suitable route. They do not prove that a route is wide enough, structurally capable, legally available or safe.

Many of those measures would also materially restrict route throughput. One-at-a-time HGV release, school-time restrictions, limited passing opportunities, temporary closures, AIL movements and shared use of common corridors could substantially reduce the number of deliveries possible within the available working day. The Applicant has not provided a programme-linked logistics model showing that its construction timetable can be achieved under the mitigation on which its assessment depends.

The land and physical works required for the transport strategy are not adequately defined. Highway boundaries remain uncertain; passing-place locations have not been fixed or secured; visibility splays may require vegetation removal and long-term control; vehicle oversailing and wheel overrun require rights over third-party land; and highway widening, verge works, drainage alterations, bridge checks and culvert reinforcement have not been comprehensively identified.

This is not a matter that can be deferred on the assumption that suitable land or works will later be found. Any necessary passing place, visibility splay, widening, vegetation clearance or structural intervention must be geographically defined, environmentally

assessed and included within the Order Limits and land powers. Works outside the Order Limits cannot be secured through a future management plan.

Abnormal indivisible loads remain an independent and potentially fatal deliverability issue. The Scheme requires delivery of major transformers, cable drums and other large electrical components, but there is no final port of entry, no agreed route across the Strategic Road Network, no complete local route and no verified internal route to every destination. Neither National Highways nor NCC has confirmed an acceptable end-to-end route to the BESS, project substations, National Grid substation or overhead-line work areas.

National Highways' position confirms that strategic-network matters are unresolved. It requires further work on the A47/A140 junction, collision data, possible junction modelling, cumulative construction traffic, traffic caps, monitoring, worker travel and AIL routeing. The strategic route cannot be assumed to be deliverable merely because the local route is being discussed separately.

AIL feasibility is binary. If a transformer or other essential component cannot pass along an approved route, cross the relevant structures and reach its compound, that component cannot be constructed. Management measures cannot overcome an inadequate bridge, an impossible turning movement, insufficient carriageway width or missing land rights.

The construction programme is not reconciled with the physical capacity of the proposed access system. The Scheme involves substantial HGV and worker movements across multiple work fronts, with additional traffic from cable installation, HDD, substations, pylons and compounds. Several sites depend on common routes, while the same roads may also be affected by cable works, temporary traffic control and abnormal loads. No integrated logistics model demonstrates that these activities can occur at the assumed intensity without exceeding route capacity or prolonging construction.

Worker transport is also insufficiently secured. The assessment relies on assumptions about car sharing, shuttle services and reduced private-car use, but workforce origins, shuttle routes, parking capacities and enforceable modal-share targets remain uncertain. If the assumed modal shift is not achieved, vehicle numbers and junction effects may be materially greater than assessed.

The baseline and significance methodology do not resolve these physical problems. The Applicant relies heavily on link-based traffic counts and percentage increases. A finding that traffic effects are "not significant" on a link does not establish that a particular junction, lane, bridge, access or conservation-area route can physically and safely accommodate the vehicles concerned. A route may produce a low percentage increase and still be unsuitable or impossible to use.

Public rights of way form part of the same deliverability problem. The Scheme requires closures, diversions and managed crossings across a wide network, including promoted routes such as Boudicca Way and Via Beata. The NCC-required internal-haul strategy may reduce HGV use of some public roads but increase conflicts with rights of way and open countryside elsewhere. Those effects must be coordinated with construction phasing and assessed across construction, replacement and decommissioning.

Highway works may also create additional ecological, drainage, landscape and heritage effects. Passing places, access widening, visibility splays and vegetation clearance may damage hedgerows, trees, roadside habitats and historic lane character. New or widened routes may alter runoff or affect ditches, culverts and watercourses. Revised transport routes cannot be approved without assessing these consequential effects.

The transport problem recurs throughout the Scheme's life. Complete solar-panel replacement, repeated BESS replacement, transformer replacement and decommissioning would all require renewed use of the access system and potentially further abnormal loads. The Applicant has not demonstrated that the routes, compounds, land rights and mitigation would remain available and suitable over the full operational period.

Requirement 15 and the outline transport documents do not presently secure a complete solution. They defer route selection, detailed measures and approvals without first demonstrating that a feasible route exists. A management plan can regulate an available and acceptable route; it cannot create missing land, widen an unassessed road, strengthen an untested structure or supply a route where none exists.

BEPS therefore concludes that the Applicant has failed to demonstrate that East Pye Solar can be constructed as applied for. The transport strategy depends upon future route selection, future engineering, future land availability, future environmental assessment and future highway approval. Those matters concern the physical means of delivering the authorised development and cannot be treated as minor post-consent detail.

The primary remedy is refusal. At minimum, the Applicant must provide an agreed end-to-end transport and AIL strategy identifying every route from port to final destination; route-specific swept-path and structural assessments; fixed passing places, accesses and highway works; proof that all necessary land and rights lie within the Order Limits; an environmentally assessed internal-haul strategy; enforceable traffic caps and monitoring; and a programme-linked logistics model. Unless that evidence establishes that every essential component can reach and be constructed at its destination within an agreed, assessed and controlled system, the Scheme is intrinsically non-deliverable.