



East Pye Solar
The Applicant's Response to Relevant
Representations Part 1: Host and Neighbouring
Local Authorities

September 2026

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1 Introduction

1.1 Purpose of the Document

- 1.1.1 An Application (the Application) was made to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under Section 37 of the Planning Act 2008 (PA 2008) for East Pye Solar (The Scheme). The Application was submitted by East Pye Solar Limited (the Applicant) on 5 March 2026 and was accepted for Examination on 2 April 2026.
- 1.1.2 The period for registering as an Interested Party through the submission of a Relevant Representation (RR) ran from Wednesday 29 April 2026 to Wednesday 10 June 2026. The Planning Inspectorate (PINS) has published a total of 2,033 RRs submitted to the Examining Authority by Interested Parties relating to the Application for the Scheme. These were published on the PINS website on Wednesday 1 and Thursday 2 July 2026.
- 1.1.3 This document provides the Applicant's response to the RRs submitted by Host and Neighbouring Local Authorities, which are listed in **Table 1.2**.
- 1.1.4 It forms part of the Applicant's response to RRs submitted. The Applicant has submitted its response to RRs submitted by other Interested Parties in the following documents at Procedural Deadline A (1 September 2026):
- **Applicant's Response to Relevant Representations Part 2: Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is seeking a Statement of Common Ground [EXAM/8.7];**
 - **Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [EXAM/8.8];**
 - **Applicant's Response to Relevant Representations Part 4: Parish and Town Councils, Parish Meetings and MPs [EXAM/8.9]; and**
 - **Applicant's Response to Relevant Representations Part 5: By Theme [EXAM/8.10].**

1.2 Structure of the Report

- 1.2.1 This document provides a response from the Applicant to the matters raised in the RR and is structured as follows:
- **Table 1.1** sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding to RRs. The wider range of acronyms

used by the Applicant can be found in the **Contents, Glossary and Abbreviations [APP-036]**.

- **Table 1.2** lists the local authorities that have submitted RRs. A link to the RR submission made by each party is linked. Each submission can be found within the [Relevant Representation Library](#) (published 6 July 2026).
 - These submissions are presented and responded to in full in **Section 2** of this document.
- 1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the PINS' East Pye Solar [Examination Library](#).
- 1.2.3 All documents submitted to the Planning Inspectorate on 5 March 2026 carrying '/APP/' within their document reference. Submissions made to the Planning Inspectorate post-submission and during the pre-examination stage carry '/AS/' instead of '/APP/' within the document reference, to reflect the submission being during the pre-examination stage.

Table 1.1 List of Acronyms of Submission Documents

	Submission Document
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
EqIA	Equality Impact Assessment
DAD	Design Approach Document
PMIE	Potential Main Issues for Examination
BNG	Biodiversity Net Gain
Shadow HRA	Shadow Habitat Regulations Regulation
Outline CEMP	Outline Construction Environmental Management Plan
Outline OEMP	Outline Operational Environmental Management Plan
Outline DEMP	Outline Decommissioning Environmental Management Plan
Outline SRMP	Outline Soil Resource and Management Plan
Outline PRowPPMP	Outline Public Rights of Way and Permissive Paths Management Plan
Outline LEMP	Outline Landscape and Ecology Management Plan
Outline ESSCS	Outline Employment, Skills and Supply Chain Strategy

Reference	Submission Document
Outline BSMP	Outline Battery Safety Management Plan
Outline CTMP	Outline Construction Traffic Management Plan
Outline OTMP	Outline Operational Traffic Management Plan

Table 1.2 List of Host and Neighbouring Authorities responded to in this document

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
RR-1451	NCC	01-001, 01-002, 01-003, 01-004, 01-004, 01-005, 01-007, 01-009, 01-010, 01-011, 02-001, 02-004, 02-005, 02-006, 02-007, 02-008, 02-008, 02-009, 02-009, 02-010, 02-011, 02-013, 02-015, 02-015, 02-017, 02-017, 02-018, 02-018, 02-019, 02-019, 02-020, 02-021, 02-021, 02-022, 02-025, 02-026, 02-027, 02-028, 02-029, 02-030, 02-031, 02-032, 02-034, 02-035, 02-036, 02-038, 02-040, 02-043, 02-044, 02-045, 02-046, 02-047, 02-047, 03-001, 03-002, 03-003, 03-004, 03-005, 03-006, 03-007, 03-007, 03-008, 03-008, 03-009, 03-010, 03-011, 03-012, 04-004, 04-005, 04-006,	Norfolk County Council

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
		04-006, 04-006, 04-011, 04-012, 04-013, 04-014, 04-015, 04-016, 04-017, 04-017, 04-018, 04-019, 04-019, 04-020, 04-021, 04-021, 04-022, 04-023, 04-024, 04-025, 04-026, 04-027, 04-027, 04-028, 04-029, 04-030, 04-031, 04-033, 04-036, 04-038, 04-039, 04-040, 04-042, 05-001, 05-003, 05-004, 05-005, 05-006, 05-007, 05-008, 06-002, 06-003, 06-004, 06-006, 06-006, 06-007, 06-009, 06-010, 06-012, 06-013, 07-001, 07-002, 07-004, 07-005, 07-006, 07-008, 07-010, 07-011, 07-012, 07-015, 07-016, 07-017, 07-019, 07-020, 08-001, 08-002, 08-003, 08-004, 08-004, 08-005, 08-005, 08-006, 08-007, 08-008, 08-013, 09-001, 09-003, 09-006, 09-010, 09-010, 09-012, 09-012, 09-014, 09-014, 09-017, 09-018, 09-018, 09-018, 09-019, 09-020,	

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
		09-021, 09-022, 09-023, 09-024, 09-025, 10-001, 10-001, 10-002, 10-002, 10-003, 10-004, 10-005, 10-005, 10-005, 10-005, 10-006, 10-007, 10-008, 10-009, 10-010, 10-010, 10-011, 10-011, 10-012, 10-013, 10-014, 10-015, 10-016, 10-017, 10-018, 10-019, 11-001, 11-002, 11-002, 11-002, 11-003, 11-004, 11-005, 11-005, 11-006, 11-006, 11-007, 11-009, 11-009, 11-010, 11-010, 11-010, 11-012, 11-012, 11-012, 11-013, 11-013, 11-014, 11-014, 11-014, 11-015, 11-016, 11-017, 11-019, 11-019, 11-020, 11-020, 11-021, 11-021, 11-023, 11-023, 11-024, 11-024, 11-025, 11-025, 11-026, 11-026, 11-027, 11-027, 12-001, 12-001, 12-002, 12-002, 12-003, 12-004, 12-005, 12-006, 12-006, 12-008, 12-009, 12-010, 12-011, 13-001, 13-002, 13-003,	

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
		13-005, 13-006, 13-006, 13-007, 13-007, 13-008, 13-008, 13-008, 13-009, 13-010, 13-011, 13-011, 13-012, 13-012, 13-013, 13-014, 13-015, 13-015, 13-016, 13-018, 13-018, 13-019, 13-022, 13-023, 13-023, 13-024, 13-025, 13-025, 13-027, 13-027, 14-001, 14-001, 14-002, 14-003, 14-003, 14-004, 14-005, 14-005, 14-007, 14-007, 14-008, 14-009, 14-010, 14-010, 14-010, 14-011, 14-011, 14-012, 14-012, 14-013, 14-014, 14-015, 14-015, 15-001, 15-001, 15-002, 15-003, 15-004, 15-005, 15-006, 15-007, 15-008, 15-009, 15-009, 15-010, 15-011, 15-012, 15-013, 15-013, 15-014, 15-014, 15-015, 15-016, 15-016, 15-017, 15-018, 15-019, 15-020, 15-020, 15-021, 15-021, 15-022, 15-022, 15-024, 15-025, 15-026, 15-027, 15-028, 15-029, 15-030,	

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
		15-030, 15-031, 15-032, 15-033, 15-034, 16-003, 16-006, 16-007, 16-008, 16-010, 16-012, 16-013, 16-014, 16-015, 16-016, 16-017, 16-018, 16-019, 16-022, 16-025, 16-026, 17-001, 17-002, 17-006, 17-006, 17-007, 17-010, 17-011, 17-012, 17-012, 17-012, 17-012, 17-014, 17-016, 17-017, 17-018, 17-019, 17-019, 17-020, 17-020, 17-022, 17-022, 17-024, 17-026, 17-026, 17-027, 17-028, 17-028, 17-029, 17-030, 17-031, 17-032, 17-032, 17-034, 17-034, 17-035, 17-036, 17-036, 17-037, 17-037, 17-037, 17-037, 17-040, 17-041, 17-041, 17-042, 17-042, 18-003, 18-004, 18-005, 18-006, 18-007, 18-008, 18-009, 18-009, 18-010, 18-010, 18-010, 18-010, 18-011, 18-012, 18-012, 18-013, 18-013, 18-014, 18-015, 18-016, 18-016, 18-016, 18-017,	

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
		18-017, 18-018, 18-019, 18-020, 18-020, 18-021, 18-022, 18-023, 18-025, 18-026, 19-001, 19-002, 19-003, 19-005, 19-006, 19-007, 19-008, 19-009, 19-010, 19-012, 19-013, 19-014, 19-015, 19-016, 19-016, 19-017, 19-017, 19-018	
RR-1795	SNC	18-015, 18-024	South Norfolk Council
RR-1865	SCC	Not included in the Book of Reference	Suffolk County Council
RR-0526	ESC	N/A	East Suffolk Council
RR-1359	MSDC	N/A	Mid Suffolk District Council

2 The Applicant's Response to Host and Neighbouring Authorities

2.1 Norfolk County Council

Table 2.1 Applicant's Response to Norfolk County Council [[RR-1451](#)]

ID	Theme	Representation	Applicant's Response
NCC-001	Cumulative Schemes, In-Combination and Cumulative Impact	3.2 Cumulative Impact – In addition to this proposal there are currently three other major solar farm proposals across Norfolk, which are of a scale which means they are within the definition of NSIPs. These projects include the neighbouring Tasway Energy Park in South Norfolk (1,100 ha), and The Drovers Solar Farm (EN0110013) (840 ha), and High Grove Solar Farm (1650 ha) (EN01100100, located to the north of Swaffham.) 3.3 These nationally significant projects would result in the cumulative loss of over 4,750 ha of agricultural land across Norfolk. The County Council has repeatedly expressed concern about the loss of best and most versatile ("BMV") land in the context of this and other solar projects. Environmental Statement ("ES") Volume 1: Chapter 15 – Soils and Agricultural Land confirms (at paragraph 15.6.14) that 68.4% of the land	The Applicant is aware of other projects in the region. The technical chapters of ES Volume 1 [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Drovers Solar Farm and High Grove Solar Farm have been included within the cumulative developments list, as detailed in ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will be submitting a DCO Interrelationship Report into the Examination. The BMV matter is covered in NCC-002.

ID	Theme	Representation	Applicant's Response
		taken up by the East Pye Solar Farm would be on BMV land (i.e. Grades 1; 2; and 3a). There are similarly high percentages of BMV used across Drovers and High Grove, at 57% and 67% respectively (paragraph 15.11.6)	With regards to the Tasway Energy Park, the Applicant has sought to assess all cumulate schemes in accordance with <i>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017</i> (the EIA Regulations) and the Planning Inspectorate's <i>Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment</i>. The EIA Regulations require the assessment to take into account '<i>the cumulation of effects with other existing and/or approved projects...</i>' (Schedule 4, paragraph 5(e)) and the same is required by the Planning Inspectorate's <i>Advice on Cumulative Effects Assessment</i>. The Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorates website as a DCO project. Should the Tasway Energy Park project ever proceed, the cumulative effects of the Scheme and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance.
NCC-002	Soils and Agriculture	3.4 As such, there are significant concerns about the loss of agricultural land and there needs to be serious consideration given to the appropriateness of the loss of high-quality	The land use change is recognised and reported in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] . There is the potential for the land under and around the panel

ID	Theme	Representation	Applicant's Response
		agricultural land across Norfolk in combination with other planned projects, both in terms of the potential loss in food production and implications for the wider farming community. Whilst the total area lost to agriculture is temporary, this temporary period represents a significant period of time: Paragraph 4.4.1 of the ES Non-Technical Summary [APP-194] states that "The Scheme is anticipated to have an operational life of 60 years". It is also noted that the worst-case scenario set out at ES Volume 1: Chapter 15 – Soils and Agricultural Land [APP-051], paragraph 15.8.65 identifies that a not-insignificant area 28.9ha of BMV would be permanently lost as a result of the scheme, which the ES identified would result in moderate adverse effects, which are considered significant.	to continue to be farmed. There are no policies or requirements for land to be farmed for food production or at any particular level of intensity, irrespective of ALC grade. The land loss of 28.9ha of BMV has been identified as a permanent moderate adverse effect which is significant. Mitigation to minimise the land take is explained in section 15.7 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The cumulative assessment, in terms of agricultural land is set out in section 15.11 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The cumulative assessment has focused on three developments which have the potential to result in cumulative effects on Soil and Agriculture within the associated study area as explained in paragraph 15.11.6. The effect on food production and on the wider economy is not significant. The area on farms in Norfolk is about 417,633ha (Table 15.9). 4,750 ha would represent 1.1% of that area. Currently over 41,000ha of arable land (10.8% of agricultural land and 15.1% of all arable land) is not being cropped. The effect on food production and the related rural

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			economy, with or without continued agricultural production from sheep grazing, is not significant.
NCC-003	Cumulative Schemes, In-Combination and Cumulative Impact	3.5 More widely, the County Council is concerned at the lack of a strategic approach to the siting of a number of new large scale solar farms across the county, which is resulting on cumulative and clustered impacts on Norfolk's environment, and the particular local communities and businesses that will be affected. 3.6 In addition, the County Council has serious concerns about the cumulative impacts of this proposal sitting alongside other types of approved and proposed energy infrastructure NSIPs in South Norfolk, including the major grid connection works being carried out adjacent to Norwich Main associated with the consented Hornsea Project Three Offshore Wind Farm (EN010080); and the proposed new 400 kV overhead power line running between Norwich and Tilbury (EN020027). Whilst the County Council is pleased that these projects have been identified in the ES Volume 3: Appendix 2.4 – Cumulative Schemes [APP-116], it remains concerned about the cumulative impacts particularly in relation to the approved and proposed energy	The Site Selection Assessment [APP-215] sets out the Applicant's staged approach to site selection, which was informed by the factors influencing site selection and design established in Section 2.10 of NPS EN-3. The Applicant is aware of other projects in the region. The ES Volume 1, Chapters 6-18 [APP-042 to APP-054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Applicant refers to the response under row NCC-001 with regard to Tasway Energy Park. The Statement of Need [APP-206] describes how and why the Scheme addresses all relevant aspects of government policy which support the rapid deployment of low carbon electricity generation at scale, and explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of suitable and available land, suitable irradiation and grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme.

ID	Theme	Representation	Applicant's Response
		infrastructure NSIPs in South Norfolk and especially the emerging Tasway Energy Park scheme, which will be in particularly close proximity to the East Pye scheme.	The Clean Power 2030 Action Plan sets out a pathway for new strategic plans for development of the GB energy system. The Connections Action Plan is clear that NESO's Connections Reform process and NESO's longer term strategic network and system planning processes must be aligned to ensure the overall network remains optimally planned. It is, therefore, expected that NESO's strategic plans build upon their own connections queue prioritisations to deliver coherent and consistent recommendations to deliver the Clean Power target on the way to achieving net zero. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will be submitting a DCO Interrelationship Report into the Examination.
NCC-004	Grid Connection The Scheme	3.7 The County Council is concerned that a 400 kV National Grid Substation is needed for the project to connect into the existing 400 kV transmission network, that would be located to the south of Great Moulton (Site 1B) (see ES Volume 2: Figure 4.1 Indicative Masterplan Sheet 10) [APP-059], close to the existing 400 kV power lines. For the new National Grid Substation, the Applicant has	The reasons for the location of the National Grid Substation and its connection into the existing 400kV overhead line; and the site selection and design evolution process relating to this are set out in the Site Selection Assessment [APP-215] and the Design Approach Document [APP-212] . As described in Section 4.3 of the Design Approach Document [APP-212] , two locations for the National Grid Substation were identified and taken

ID	Theme	Representation	Applicant's Response
		confirmed that the existing dual circuit 400kV overhead line will be diverted (Work No 5) into a newly constructed double busbar substation (i.e. the National Grid Substation), and that this will involve up to 4 new pylons being built along the proposed diversion route leading into the new National Grid Substation. Two site options were considered in the Preliminary Environmental Information Report ("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 Energy Storage System ("BESS"); and East Pye Substation. 3.8 This latter option was favoured by the County Council as it would have been further away from Great Moulton and would consolidate transmission infrastructure into one area avoiding: a wider visual impact; and disruption during construction. Instead the Applicant confirmed through the subsequent Targeted Consultation in October 2025 that the new National Grid substation will be sited to the south of Great Moulton within site 1B and will not be pursuing the additional option to the south (that was consulted upon at the Phase 2 (PEIR) statutory consultation stage).	forward for environmental consideration and consultation. Following further assessment, including an environmental appraisal (RAG rating exercise), Option 2 within Sub-Site 1B was selected. The Design Approach Document [APP-212] explains that this was principally due to the overlap between Option 1 and a consented solar development. The assessment also concluded that Option 2 was preferable from a flood risk and landscape and visual perspective because Option 1 was closer to the Starston Brook floodplain and would have required a PRoW diversion. The Applicant acknowledges NCC's concern regarding the proximity of the selected location to Great Moulton; however, the process identified opportunities for landscape screening within Sub-Site 1B through the use of existing boundary vegetation in line with the Horlock / Holford rules. In response to landscape and visual considerations, the National Grid Substation was reorientated from an east-west to a north-south alignment during the design evolution process in order to maximise screening from existing vegetation, reduce visibility from Great Moulton and increase the offset from Narrowgate Way

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		3.9 The County Council is disappointed by the selection of these two options. Not only does this mean that the National Grid Substation will be located closer to Great Moulton but that there will also be additional pylons to be located in closer proximity to the village.	PRoW, as shown on Figure 5.2 of the Design Approach Document [APP-212]. The Green Infrastructure Strategy [AS-005] shows the landscaping proposals for the National Grid Substation. The Applicant refers to the response under row NCC-005 for further details. Requirement 5 of draft DCO [AS-032] requires further consideration of the final layout and design of the National Grid Substation and associated infrastructure at the detailed design stage. The draft DCO [AS-032] has been updated to make this clear by expressly incorporating Work Nos. 4 and 5 into the Requirement drafting.
NCC-005	Grid Connection	3.10 In its response to the subsequent Targeted Consultation the County Council again made clear its preference for the southern substation site (Option 1) as it was further away from Great Moulton and because it would consolidate transmission infrastructure into one area avoiding a wider visual impact and disruption to local residents during construction. The updated location of the National Grid substation close to the village of Great Moulton raises the following concerns in relation to:	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] assesses the visual effects of the National Grid Substation considering the worst-case parameters. VL3/Site 1 represents the view from Great Moulton. It is assessed to have Major to Substantial adverse (significant) effects during construction and operation Year 1. The effect reduces to a Moderate adverse (significant) in Year 15 of operation. The Green Infrastructure Strategy [AS-005] seeks to retain and enhance existing vegetation, to aid the integration of the Scheme and National Grid

ID	Theme	Representation	Applicant's Response
		(a) The visual impact on local residents and the setting of Great Mouton village; (b) This close proximity raises health and safety concerns particularly in the event of fire breaking out at the substation; (c) The wider health and mental health impacts on the residents directly affected, which have not been considered to date by the applicant, which required further investigation.	Substation within the environment. New woodland belts and native tree planting provide screening to the Scheme; it improves biodiversity and supports green infrastructure connectivity. This is secured through its inclusion in the Outline LEMP [APP-199] which is secured under Requirement 7 in the draft DCO [AS-032]. As acknowledged in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054], Section 18.2 Major Accidents and Disasters, additional infrastructure such as the substations and inverters have a low risk of electrical fire. The design of the Scheme has been undertaken in accordance with relevant guidance and equipment will be selected to meet required safety standards. As set out in the Outline OEMP [APP-197], all works will be undertaken in accordance with relevant Health and Safety legislation and guidance. An appropriate risk assessment will be produced prior to construction to minimise the risk of major accidents during operation. Details of fire, police, emergency services, and hospitals will be publicised and included in the site induction. An Emergency Response Plan would be followed in the event of fire. The impacts of the scheme on human health are addressed in ES Volume 1, Chapter 18 – Other

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			Environmental Matters [APP-054], Section 18.6 Human Health Summary Statement (and the associated chapters in the ES that this is based on). Impacts on mental health are addressed in the Equality Impact Assessment [APP-214] which included Great Moulton within its study area. The Equality Impact Assessment [APP-214] recognises mental health impacts of the Scheme as raised by multiple stakeholders, including NCC. The type of issues that were raised were - potential distress and anxiety caused by the construction and operation and maintenance of the Scheme (including potential compulsory purchase orders); perceived impacts of Electromagnetic Fields on mental health; the cumulative impacts of the Scheme on real and perceived impacts on neighbourhood quality, noise, air quality, water environment and socio-economics (particularly on older adults and those with disabilities) and; the specific impact of the National Grid Substation on those who are vulnerable and/or have disabilities. With specific regard to community liaison, this is directly secured through Requirement 4 of the draft DCO [AS-032] through the provision of a community liaison group. This group will act as an intermediary between the public and the construction contractors to

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			ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.
NCC-006	Design Principles	3.11 The County Council at the PEIR stage also commented that there needed to be further detail on the scale and design of the proposed substations, as well as further detail on the landscape mitigation needed to accompany this element of the Project. The County Council welcomes that further details on the scale and design of the substations has, now been provided.	The Applicant welcomes NCC's acknowledgement that further details on the scale and design of the substations have been provided.
NCC-007	Design Principles	3.12 In addition, the County Council at the PEIR stage expressed concern regarding the potential use of tracking solar panels given their height and concerns regarding the uncertainty as to the exact location, design and scale of the new Substations connecting to the wider transmission network. The County Council is disappointed that the submitted application has failed to narrow down the panel design and still retains options for the use of Single-Axis Tracker Panels (Option A) and/or Fixed Panels	The Scheme has been assessed and developed on a parameters-based approach, as described in the ES Volume 1, Chapter 4 - The Scheme [APP-040] and the Design Principles, Parameters and Commitments [APP-213]. The Applicant acknowledges NCC's concern that flexibility remains for either Single-Axis Tracker Panels (Option A) or Fixed Panels (Option B). The Applicant has retained this flexibility and assessed the Scheme on the basis of the maximum worst-case parameters set out in the Design Principles, Parameters and Commitments [APP-213] and Works Plan [AS-002 and AS-003].

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		(Option B) (ES Volume 1: Chapter 4 – The Scheme [APP-040], paragraph 4.3.8).	The Design Approach Document [APP-212] explains that the Scheme has been designed using secured parameters rather than a fixed final layout, enabling detailed design to be undertaken post-consent whilst remaining within the assessed design envelope. The design of the Scheme has been informed by an environmentally led approach, setbacks from residential properties embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme is set out in the Design Approach Document [APP-212]. Mitigation is embedded through the design principles and commitments, including the design buffers, secured within the Design Principles, Parameters and Commitments [APP-213] and Works Plan [AS-002 and AS-003]. Accordingly, whilst flexibility has been retained regarding panel technology and the detailed design of substations, that flexibility is constrained by the parameters, mitigation measures and design principles assessed through the Application and secured through the DCO framework.
NCC-008	Legal	3.13 The County Council remains of the view that there needs to be appropriate compensation for those households;	The Book of Reference [APP-022] includes persons who may be eligible to claim compensation if the DCO is granted, the Scheme

ID	Theme	Representation	Applicant's Response
		communities and businesses affected by the proposed Solar Farm; and	developed and compulsory powers used. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) may be eligible to claim compensation for any physical impacts from the operation of the Scheme, such as noise and vibration. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made. The Applicant refers to the response under row NCC-009 for further details.
NCC-009	Community Benefits	3.14 The County Council would expect the Applicant to set up a Community Benefit Fund. The application does not include any details for such a fund.	The Applicant is committed to ensuring that local communities benefit from the Scheme. Throughout the pre-application process, the Applicant has consulted on community benefits and based on feedback and ongoing discussions, will determine how best to distribute funding. The Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside the DCO process (it cannot be considered as part of the decision-making process).

ID	Theme	Representation	Applicant's Response
			The Applicant welcomes the continued engagement with NCC on the mechanics of the Community Benefit Fund and the areas in which it will contribute to. The Applicant will also continue to engage with other consultees, such as South Norfolk Council (SNC), local parish councils and any local communities that would like to be involved and have needs or services they would like to see benefit from the available funds.
NCC-010	Landscape and Visual	4.2 ES Volume 1: Chapter 7 – Landscape & Visual [APP-043], together with the supporting figures and appendices identifies effects in relation to landscape and visual impact during the construction and operational phases. Likely effects have been assessed in the relation to the construction, operational and decommissioning phases of the scheme. 4.3 The key policies governing the consideration of landscape and visual effects in this case can be found in section 5.10 (Landscape and Visual) of National Policy Statement ("NPS") EN-1. At a very high level, the NPS acknowledges that landscape impacts are almost inevitable in the case of	The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features; and where appropriate introduction of new landscape measures to support landscape integration and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are

ID	Theme	Representation	Applicant's Response
		electricity infrastructure, but that in general this should not prevent projects from being consented. However, policy also makes it clear that the mitigation hierarchy must be followed, including compensation for residual effects.	set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the draft DCO [AS-032]. The mitigation hierarchy has been applied and where environmental receptors were considered to be of greater importance development has been limited, such as at Sub-Site 8a, and Site 9. The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme.
NCC-011	Planning, Policy Compliance Ecology and Biodiversity	4.4 In addition to biodiversity net gain, EN-1 also makes clear that developments may deliver wider environmental gains and benefits, including most pertinently for landscape, the following given in paragraph 4.6.13 of EN-1: • landscape enhancement; • increased access to natural greenspace; and	The Scheme's compliance with NPS EN-1 is set out within the Policy Compliance Document [APP-210] and within the Planning Statement [APP-209]. The Scheme has been designed to include landscape and ecological enhancement with the landscaping shown in the Green Infrastructure Strategy [AS-005] and the long-term habitat management and monitoring measures described in the Outline LEMP [APP-199]. The Scheme also

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		the enhancement, expansion or provision of trees and woodlands. 4.5 Paragraph 5.10.6 of EN-1 requires projects to be designed carefully, with an aim of minimising harm to the landscape, providing reasonable mitigation where possible and appropriate	provides new permissive paths and community accessible space. Embedded mitigation, including design buffers such as offsets to woodland, hedgerow and watercourses, are set out in Section 8.8 of ES Chapter 8 – Ecology and Biodiversity [APP-044] and the Design Principles, Parameters and Commitments [APP-213]. Further, the potential for adverse effects during construction, such as damage and pollution, have been avoided and designed out where practicable and will be controlled through the implementation of the Outline CEMP [APP- 196].
NCC-012	Landscape and Visual	4.6 The project does not extend into any nationally designated areas in Norfolk, but paragraph 5.10.12 does recognise that there are landscapes which are highly valued locally. The paragraph goes on to say that locally valued landscapes should not be used in themselves to refuse consent. The County Council's view is that although locally valued landscapes do not require refusal of an application, it would be appropriate for the applicant to take a proactive approach to mitigation and compensation in these areas.	The Applicant has sought to reduce adverse effects on the landscape and its features including those that considered locally valued through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and

ID	Theme	Representation	Applicant's Response
			woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and the Outline DEMP [APP-198], respectively via the draft DCO [AS-032]. The Applicant considers that where valued aspects were of greater importance development has been limited, such as at Sub-Site 8a, and Site 9. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are set out in the Outline CEMP [APP-196], the Outline OEMP [APP-197] and the

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			Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the draft DCO [AS-032] .
NCC-013	Landscape and Visual	4.7 Paragraph 5.10.14 sets out that the SoS will have to judge whether the visual effects on sensitive receptors outweigh the benefits of the project. Because the Critical National Priority (CNP) presumption applies, it is unlikely that these effects would outweigh the benefits in the final analysis. This does not provide an exemption from application of the mitigation hierarchy.	The Applicant considers the mitigation hierarchy has been applied. The Applicant refers to its response to NCC-010.
NCC-014	Landscape and Visual Planning and Policy Compliance	4.8 Principles informing landscape and visual impact assessment ("LVIA") are dealt with in paragraphs 5.10.16 to 5.10.25 of EN-1. 4.9 Further policy specific to solar PV generation is set out in EN-3, paragraphs 2.10.85 to 2.10.93 and paragraphs 2.10.23 to 2.10.25. 4.10 These make clear that Applicants should carry out a LVIA and report it in the ES. Photomontage visualisations may be required to demonstrate the effects of a proposed solar farm, on sensitive or valued landscapes, particularly designated	The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. A summary of how Chapter 7 - Landscape and Visual has been considered is set out in ES Volume 3, Appendix 2.3 Legislation, Planning Policy and Guidance [APP-115] . The Applicant has submitted a number of visualisations as consulted on with SNC. The location and type of visualisations are illustrated in

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		landscapes, the setting of heritage assets and any nearby residential areas or viewpoints. 4.11 Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands	ES Volume 2, Figure 7.7 - View Locations and Visualisations [APP-082]. The methodology for visualisation production is set out in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. The visualisations have been prepared in accordance with industry-standard guidance, specifically the Landscape Institute [2019] Visual Representation of Development Proposals Technical Guidance Note 06/19 [TGN 06/19]. The types of visualisation produced include, Photowires, Photomontages / Photowires for Winter Year 1 with no landscape measures shown, and Photomontages Summer Year 15 with established landscape measures shown. The Scheme's compliance with NPS EN-1 and EN-3 policy is set out within the Policy Compliance Document [APP-210] and the Planning Statement [APP-209].
NCC-015	Landscape and Visual	4.12 It is also stated that the approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and may as a result have a wider zone of visual	The Applicant considers the zone of visual influence of the Scheme to be varied based on the landform, vegetation and built form of the Landscape. ES Volume 2, Figure 7.5.1 - Zone of Theoretical Visibility with View Locations [APP-070] demonstrates that in general the visual influence and visual effects diminish with distance from the Scheme. The cumulative landscape and

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		influence than other types of onshore energy infrastructure.	visual impact assessment has taken into account the ZTV.
NCC-016	Landscape and Visual	4.13 Whilst the County Council recognises national policy support for renewable energy infrastructure, the scale and extent of the proposed scheme means that careful consideration is required to ensure landscape and visual effects are appropriately assessed, mitigated and where necessary, compensated.	The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The Green Infrastructure Strategy [AS-005] provides detail on the proposed landscape and ecological measures, and the Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the

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			Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. Factors considered in the site selection process are given in the Site Selection Assessment [APP-215]. This includes consideration of planning, environmental and operational factors in the search for suitable sites. These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3. Consideration has included both technical constraints (i.e. proximity to grid connection, site size, compatibility of land uses) and consideration of the avoidance and reduction of environmental impacts by excluding ecological, landscape and heritage designations.
NCC-017	Landscape and Visual	4.14 The County Council has reviewed ES Chapter 7 [APP-043] alongside the supporting appendices. The LVIA follow industry standard guidance, including GLVIA3 (Guidelines for Landscape and Visual Impact Assessment) and relevant technical notes.	The Applicant welcomes this confirmation.

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NCC-018	Landscape and Visual	4.17 At this stage the key concerns relate to: • The assessment of landscape value places emphasis on the absence of formal designation, which whilst correct, may underplay the experiential and recreational qualities; • Generally, the experience of recreational users of public rights of way ("PRoW") and promoted routes could be considered as understated particularly given the large scale and medium-long term effect of closures and major change to the nature of the surrounding landscape, including proposed mitigation measures.; and • Further clarification is needed regarding the certainty, timing and effectiveness of proposed landscape mitigation measures.	The methodology is set out in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. Table 7.1.2 provides detail on the factors that influence landscape value. Where appropriate to the landscape receptor these factors have been acknowledged in ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119] and have influenced the overall judgment on value for the receptor. The Applicant considers that existing landscape designations are taken as an indicator for landscape value, however the value of undesignated landscapes is also considered. In accordance with relevant guidance, the Applicant can only reliably undertake an assessment against recognised landscape designations, or the absence of such designations, alongside other published evidence relating to landscape character and value. It is not the role of the Applicant to arbitrarily determine or apply landscape designations where none exist. The assessment has therefore been carried out using the available evidence in a consistent and transparent manner, and the conclusions on landscape value are considered robust and do not underplay the value of the landscape resource.

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			A PRoW Visual Amenity Assessment is included in ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]. The assessment relates to the impacts on users of recreational resources comprising PRoW, including public footpaths; bridleways; restricted byways; and Byways Open to All Traffic (BOAT) within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources. The Outline PRoWPPMP [APP-203] details the proposed paths and connection with existing network and the anticipated closures and management of PRoW. A detailed PRoWPPM will be submitted to and approved by the relevant planning authority in accordance with Requirement 17 of the draft DCO [AS-032]. The Outline LEMP [APP-199] establishes a framework for the Scheme, with all details subject to further work and stakeholder engagement. The Outline LEMP is supported by the Green Infrastructure Strategy [AS-005], which shows the proposed landscape and ecological measures across the Scheme. The Outline LEMP [APP-199] includes a commitment to providing a LEMP created prior to

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			implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the draft DCO [AS-032]. The LEMP will include: 1. The detailed landscape proposal plans to identify the location, number, species, size, and planting density of any proposed landscape planting and ecological measures. 2. Landscape planting specification including, cultivation, importing of materials and other operations to ensure landscape planting establishment. 3. Implementation timetables for all landscape planting and ecological measures. 4. Management and maintenance timetables for all landscape planting and ecological measures. 5. Monitoring prescriptions for all landscape planting and ecological measures.
NCC-019	Landscape and Visual	4.18 Chapter 7 clearly sets out that Landscape sensitivity is derived from a combination of susceptibility and value. The LVIA baseline identifies landscape	The methodology for the LVIA is set out in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. Table 7.1.4 provides details on the factors that influence landscape susceptibility.

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		characteristics within the study area that include: • Both NCA and LCA; and • The presence of PRow and promoted recreational routes. 4.19 These features are consistently identified within the baseline landscape character descriptions and supporting appendices. The County Council considers that many of the characteristics of these are generally associated with increased susceptibility to large scale solar development, particularly where development introduces built form, perimeter fencing, substations and associated infrastructure over a wide area.	The Applicant considers that there is variation in the susceptibility of each landscape receptor to the Scheme and its various components. The key characteristics of each landscape receptor that influence its susceptibility are acknowledged in ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119]. In general, the susceptibility of the landscape receptors is considered to be medium and high, reflecting the susceptibility of rural landscapes towards solar development and energy infrastructure.
NCC-020	Landscape and Visual	4.20 The assessment of sensitivity appears to reflect this susceptibility overall. Landscape sensitivity is a key determinant in the assessment of magnitude and significance of effects – where susceptibility is underplayed there is a risk that significant landscape effects also become understated. 4.21 It is noted that there is a medium to high sensitivity across most of the area and	The Applicant notes this response. The Outline LEMP [APP-199] establishes a framework for the Scheme, with all details subject to further work and stakeholder engagement. The Outline LEMP is supported by the Green Infrastructure Strategy [AS-005], which provides detail on the proposed landscape and ecological measures across the Scheme.

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		mitigation should ensure that this is adequately addressed.	
NCC-021	Landscape and Visual	4.22 The County Council understands that this is a matter of judgement not a methodological concern, but it considers that it is suitable to raise this concern and to ask the applicant to: • Provide further justification explaining how the identified susceptibility factors have been weighted in reaching the overall landscape sensitivity judgements; • Clarify how perceptual qualities such as tranquillity, enclosure, skyline integrity and recreational function have influenced sensitivity conclusions particularly where any mitigation may itself have an impact on this; and • Confirm that sensitivity judgements are considering baseline and not including assumptions about mitigation effectiveness.	The methodology is set out in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. This identifies that the assessment of receptor sensitivity combines judgements on the value attributed to the receptor and the 'susceptibility to change' of the receptor to the specific type of development proposed. In general, and in taking a worst case position the higher judgement from either the value or susceptibility to change judgment is considered for the overall sensitivity for the receptor. The factors which have influenced these judgments are set out in ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119], and ES Volume 3, Appendix 7.4 - Visual Baseline [APP-121]. ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119], defines perceptual qualities for each receptor where appropriate. Where the Scheme or the mitigation proposed could influence these perceptual qualities these have been considered and detailed in ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120]. The Applicant confirms that judgements on sensitivity reflect the current and future baseline

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			scenario which does not include the Scheme or its proposed mitigation.
NCC-022	Landscape and Visual	4.23 ES Volume3: Appendix 7.2 – Landscape Baseline [APP-119] assesses the landscape value of the study area. The County Council notes that whilst the assessment acknowledges the landscape value, there may be an emphasis on the absence of national or local designations when determining value. 4.24 There is a risk that this approach may underrepresent certain important values such as: • Experiential and perceptual value; • Recreational value; and • The contribution of historical landscape features. 4.25 Landscapes may be valued for reasons beyond formal designation and where value is understated the combined outcome for landscape sensitivity may not fully reflect the importance of the landscape to communities and users.	The methodology is set out in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. Table 7.1.2 provides detail on the factors that influence landscape value. Where appropriate to the landscape receptor these factors including perceptual qualities, recreational value, and time depth have been acknowledged in ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119] and have influenced the overall judgment on value for the receptor. The Applicant considers that existing landscape designations are taken as an indicator for landscape value, however the value of undesignated landscapes is also considered through judgement on particular features, notable aesthetic and perceptual qualities or the contribution to the overall character and value of the wider landscape. The Applicant notes the Authority's response and considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines, it has informed the iterative design

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			process and is robust and appropriate for the assessment of the Scheme.
NCC-023	Landscape and Visual	4.26 The County Council would like the Applicant to: - Clarify how experiential and recreational qualities that have been identified in the baseline have been considered when determining landscape value, particularly when moving through the landscape and where landscapes are not formally designated but contribute to the perceived value and enjoyment of the area; and - Consider additional mitigation or enhancement measures where effects are identified.	The Applicant refers to its response to NCC-022. In addition, the Applicant considers the Scheme delivers a range of reasonable and achievable mitigation measures. The Green Infrastructure Strategy [AS-005] provides a wide range of proposed landscape and ecological measures, which have been included to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme. Embedded mitigation also includes the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation to mitigate identified effects. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. No additional landscape and visual mitigation and enhancement measures have been identified as necessary because achievable mitigation within the Scheme has already been included in the embedded mitigation as an integral part of the Scheme.

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NCC-024	Landscape and Visual	4.27 The LVIA identifies several PRow and promoted routes within and around the study area. Whilst visibility may be intermittent or filtered, the County Council is concerned that the change in landscape character experienced along the routes may be more substantial than is reflected in the applicant's conclusions. For recreational users effects are not limited to individual viewpoints but instead relate to the cumulative experience of moving through the landscape.	A PRow Visual Amenity Assessment is included in ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]. The assessment relates to the impacts on users of recreational resources comprising PRow, including public footpaths; bridleways; restricted byways; and Byways Open to All Traffic (BOAT) within the Order Limits. It considers the physical changes (e.g. PRow diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources. The Outline PRowWPPMP [APP-203] details the proposed paths and connection with existing network.
NCC-025	Landscape and Visual PRow Access	4.28 The County Council would like the applicant to: • Clarify how experiential change along the routes has been assessed; and • Consider route specific mitigation measures through planting or landscape enhancements to offset experiential change whilst considering the effect that these measures may have themselves on the experience of the landscape. It is noted that with certain PRow the mitigation measures themselves will represent a significant change to the	The experiential change is assessed in in ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]. Please see response under row NCC-024. In addition, the Applicant considers that the Green Infrastructure Strategy [AS-005] provides a wide range of proposed landscape and ecological measures, which have been included to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme. This has included considered siting of new features and where appropriate introduction of new landscape

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		landscape or experience of it and further consideration should be given in these cases.	measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. Where proposed mitigation could result in an adverse effect these have been acknowledged in ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149], and ES Volume 1, Chapter 7 - Landscape and Visual [APP-043].
NCC-026	Landscape and Visual	4.29 In relation to the timing and effectiveness of mitigation, the County Council requests further clarification on the advanced planting and phasing of landscape mitigation to ensure the prevention of significant effects. Particularly measures to ensure that it is effectively established.	The Applicant will explore proposals for advanced planting. The Applicant will review opportunities for additional commitments and discuss with the Authority in due course.
NCC-027	Landscape and Visual	4.30 Overall, the matters raised above are primarily on the application of professional judgement rather than deficiencies in methodology, therefore the County Council is satisfied that these issues are capable of	The Applicant notes this response and hopes the responses in this document provide further clarity to a number of matters. The Applicant is keen to continue dialogue with the Authority to resolve any further matters.

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		resolution through further clarification and consideration of the scheme.	
NCC-028	Arboriculture	4.31 In preparing this response the County Council has considered ES Volume 1: Chapter 7 - Landscape & Visual [APP-043] and ES Volume 3: Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP-150]. 4.32 The County Council considers that there is insufficient information available to provide a definitive response to the proposals.	The Applicant considers the materials provided are adequate and informative, and presented information using standard mapping conventions. The ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] includes the results of the tree surveys conducted in accordance with <i>British Standard BS5837: Trees in Relation to Design, Demolition and Construction (2012)</i> and considers relevant legislation, national policy statements and planning policy guidance for arboriculture. The AIA report has clearly identified the main arboricultural features that may be affected by the scheme and suggested appropriate tree protection measures as secured through the Outline CEMP [APP-196] to mitigate any potential tree impacts.
NCC-029	Arboriculture Transport and Access	4.33 Section 2.3.12 of the ES Non-Technical Summary [APP-194] states that “Additional small areas of land throughout the Scheme associated with updates to highway visibility splays have been included” and that “Additional small areas of land throughout the Scheme to accommodate abnormal indivisible loads (“AIL”) that could result in highway works, temporary removal of street	For visibility splay for vehicles and highway works associated with AIL movements, vegetation may be required to be trimmed and, in some cases, vegetation and/or street furniture removed when absolutely necessary to maintain the required sight lines for safety and to accommodate oversail. Article 40 of the draft DCO [AS-032] includes powers in respect of felling or lopping of trees and removal of hedgerows. Site Access designs,

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		furniture and/or vegetation removal, have been included". 4.34 The County Council is concerned that there does not appear to be any consideration within the ES Volume 3: Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP-150] of visibility splays, AILs or any highways work required to accommodate an increase in vehicle movements. It also notes that there is no schedule of tree works that quantifies the tree work required for visibility or improvements to the highway. The impacts of tree works and removal on some narrow rural roads could be significant and unacceptable.	visibility splays and swept-path analysis is detailed in Appendix C of ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]. Street furniture removal will be temporary and will be reinstated, as set out in the Outline CTMP [APP-201]. The Outline CEMP [APP-196] sets out management measures in relation to tree pruning, including an Arboricultural Method Statement will be adopted and that the pruning works will be implemented by a suitably qualified arboricultural Contractor working in accordance with British Standard 3998: 2010 'Tree Work – Recommendations. The ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] provides the impacts of the visibility splays at the indicative access points in Table 1.6 and indicated as 'Possible tree impacts' in Annex D Tree Impact Plan. The schedule of tree works is not available at this stage as the impacts of AILs, visibility splay requirements or any highway work is subject to detailed design and supporting management and mitigation measures as set out in the Outline CTMP [APP-201].
NCC-030	Arboriculture	4.35 Should work be proposed to trees and hedges that are not under the control of the project then assurance must be provided that	The Applicant makes note of this comment. As set out in Article 40 of the draft DCO [AS-032] , the undertaker must do no unnecessary damage to

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		the tree/hedge owners are able to accommodate such work and that there is adequate mitigation in place for any impact.	any tree or shrub and must pay compensation to any person for any loss or damage arising from such activity; and mitigation measures for any tree impact are secured in the Outline CEMP [APP-196] .
NCC-031	Arboriculture	4.36 It is also noted that the submitted Tree Constraints Plan and Tree Impact Plan included in ES Volume 3: Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] do not have an appropriate overview map or easily navigable base-mapping. Future submissions must have greater clarity	An overview map is shown in the index map at the first page of the submitted Tree Constraints Plan and Tree Impact Plan included in the ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] that displays the geographical area covered by each sheet within a larger set and the maps can be navigated by searching the tree numbers in the PDF. Drawings can be produced to a larger drawing scale in future submissions if required.
NCC-032	Ecology and Biodiversity	4.38 The County Council notes that the applicant states that Fritton Grange Meadows County Wildlife Site ("CWS") and Lower Spring Wood CWS have been assessed and impacts during construction are identified as having Negligible effect which is not significant. This is because the cable route corridor ("CRC") route will use trenchless techniques (a method known as Horizontal Directional Drilling ("HDD") that will go under the CWS to avoid habitat fragmentation, degradation and habitat loss. There will also be buffer zones and standard pollution	Section 8.9.51 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] confirms the adoption of the use of trenchless techniques such as HDD, which is an established technique used for avoiding impacts to features, including sensitive habitats. For Fritton Grange Meadows CWS the cable will be buried to at least 5m below the surveyed riverbed, while the cables will be fluid free to reduce the risk of leaching of pollutants. Section 2.4 of the Outline Cable Route Construction Statement [APP- 216] requires crossings to be supported by a Method Statement which is a requirement of the Outline CEMP [APP-

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		control measure implemented as per the embedded mitigations section above. 4.39 The description of Fritton Grange Meadows states that the site consists of a long series of fields, a mixture of tall rank grassland and tall fen vegetation in lower areas. It also contains a number of ponds and an area of game crops. Springs feed into an extensive dyke system and part of the area has recently been planted with conifers, while another part is grazed, and the whole site is generally used for shooting. 4.40 The County Council is however concerned that about the impacts of the use of HDD and whether it is suitable for sites with a number of water bodies with both flowing and still with water flowing from these bodies. 4.41 The County Council also notes that the Applicant is using older mapping which may not include newer Roadside Nature Reserves ("RNRs"). Whilst RNRs are not to be impacted by the development or its ancillary works, there are trees and hedges alongside them that may be impacted. The County Council is concerned that any such	196]. The use of trenchless techniques such as HDD will avoid open cut methods and negate any impacts to the CWS. Further, Section 2.4 of Outline Cable Route Construction Statement [APP- 216] commits to all works relating to trenchless techniques such as HDD activities being undertaken in line with a Method Statement for each stage of construction of the CRC which is set out in the Outline CEMP [APP-196]. The final CEMP will include a break-out contingency procedure to manage any accidental releases of drilling fluid, including immediate containment and clean-up measures. Construction phase mitigation also requires An Ecological Clerk of Works (EcoW) to oversee works in proximity to watercourses where required, including HDD operations, to ensure protection of aquatic habitats. The Applicant is satisfied that all RNRs which lie within and adjacent to the Order limits have been identified at the time of submission but welcome any comment on those recently established. All RNRs are designated for their remnant grasslands (and associated species abundance), by their very nature, this habitat is low in height,

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		works should incorporate appropriate measures to mitigate any impacts on RNRs, which should be agreed with the County Council.	which will pose little risk to highway visibility for Order Limits access and therefore, will not be subject to clearance activities. However, adjacent overgrown hedgerows or overhanging tree canopies within the footprints of the RNRs may require temporary reduction measures during the construction phase, to aid access and visibility splays (which may potentially benefit the RNR ground flora). No other activities are proposed within the RNRs boundaries and where practicable, construction/ decommissioning phase activities (apart from the actual use of the road surface) will implement a 30m buffer surrounding the RNRs. The Outline CEMP [APP-196] sets out measures to ensure run-off control, pollution prevention and construction phase dust impacts will be implemented to avoid impacts to important ecological features which include RNRs.
NCC-033	Ecology and Biodiversity	4.42 The County Council notes that the BNG report identifies that the Local Nature Recovery Strategy ¹ ("LNRS") for Norfolk and Suffolk has not been published. This is not now the case. It has been published and should be taken into account in determining post-development gains.	Whilst the Schemes design evolution has progressed prior to the publication of the LNRS, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] have been applied to retain, protect and enhance ecological assets. Where possible, areas of land located within the Order Limits designated as 'areas that could

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			become of particular importance' (ACB) within the LNRS have been targeted with their suggested habitat type when developing the ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. This not only contributes towards a quantifiable BNG, but also to helps to strengthen existing habitat networks and increase landscape connectivity. These measures are calculated within and inform both the Biodiversity Net Gain Report [APP-218] and Biodiversity Net Gain Statutory Metric [APP-219]. As the Scheme is outside Suffolk the Suffolk County LNRS has not been used. Further, Natural England in their Relevant Representation acknowledge use of the Norfolk LNRS but do not mention any requirement to refer to the Suffolk LNRS.
NCC-034	Ecology and Biodiversity	4.43 Some of the unvegetated ProW are particularly species rich (informally known as Green Lanes). The County Council is concerned that there is potential for impact on these as they are not designated as RNRs are but are ecologically important.	Section 8.8 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] sets out how important ecological features, including habitats such as species rich grassland, will be protected through the adoption of the mitigation hierarchy. This approach has been applied to all important ecological features, even those which are not designated but nonetheless have ecological value. This hierarchy has been adopted throughout the

ID	Theme	Representation	Applicant's Response
			Scheme evolution and will be secured during construction by details included in the Outline CEMP [APP-196]. In accordance with ES Volume 1, Chapter 4 – The Scheme [APP- 040] a buffer of 15m will be applied to all PRoW, secured through the Design Principles, Parameters and Commitments [APP-213] which sets out the minimum offset distances. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the draft DCO [AS-032]. If construction encroaches within 15m, works will be temporary in nature and affected habitats will be reinstated to their baseline habitat condition. The Biodiversity Net Gain (BNG) Report [APP-218] proposes to retain medium distinctiveness habitat, including grassland (which may include species rich PRoW), which is be set out in the Outline LEMP [APP-199].
NCC-035	Ecology and Biodiversity	4.44 The County Council is concerned that Barbastelle bats have had recorded roosts and notably maternity roosts in the woodlands surrounding the site, making it	Table 8.13 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] confirms that roosting and foraging/commuting barbastelle bats are of National Importance. An understanding of the

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		potentially of national importance. There is a potential for direct impacts where the assessment concludes that there is potential minor direct impacts upon these habitats during the construction (and potentially decommissioning phases).	presence of bats and the distribution of bat roosts, including Barbastelle maternity roosts is included in Tables 3.3 and 3.4 of ES Volume 3, Appendix 8.5 Ground Level Tree Assessment report [APP-156] and ES Volume 3, Appendix 8.6 - Bat Activity Survey report [APP-157]. As a precautionary measure, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and the Works Plan [AS-002 and AS-003] include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits have and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges). To safeguard the species, the Applicant has adopted precautionary measures, through embedded design principles detailed within the Design Principles, Parameters and Commitments [APP-213] illustrated within ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. These include the above-mentioned 30m standoff distance from ancient woodlands, at least 15m from non-ancient woodlands, 30-50m pond buffers, and minimum of 10m buffer between hedgerows and ditches/watercourses and solar PV

ID	Theme	Representation	Applicant's Response
			apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar Solar PV developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree/scrub planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199]. When considering the scale of the Scheme, this, will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure. Thereby, resulting in extensive landscape-wide habitat provision for the benefit of all local bat populations (amongst other species), thereby contributing towards the species favourable conservation status. The assessment in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] during construction, operation and decommissioning for both roosting and foraging/commuting bats (Paragraphs 8.9.579 to 8.9.629) identified measures which will be put in place and secured by the Outline CEMP [APP- 196], Outline LEMP [APP-199] and Outline DEMP [APP-198], including avoiding works close to woodland, designing out impacts to woodland, trees and

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			hedgerows as much as possible with the establishment of buffers and stand-off distances; avoidance of night time working; adoption of a sympathetic lighting strategy as per Section 4 of ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151] and the implementation of pollution prevention and control measures. The Outline LEMP [APP-199] has incorporated a number of enhancements including the erection of bat boxes to provide artificial roosting opportunities for all species of bats. The Applicant considers that the assessment made for Barbastelle bats and the impacts of the Scheme have been appropriately applied and mitigated for.
NCC-036	Ecology and Biodiversity	4.45 The County Council notes that the White-Clawed Crayfish Site surveys did not find White-Clawed Crayfish within the order limits. The ES nevertheless states that appropriate mitigations are required. The absence of signs during a walkover survey cannot be taken to confirm absence. Given the documented vulnerability of White-Clawed Crayfish to biosecurity failures and the broader catchment context, the County Council considers that construction controls should include robust biosecurity, pollution prevention, and sediment management	ES Volume 3, Appendix 8.9 - Aquatic Habitat Assessment Report [APP- 160] considers impacts to white clawed crayfish are unlikely due to the paucity of records and unsuitability of the habitat. This is further explained in paragraphs 8.9.451 to 8.9.470 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Applicant acknowledges that the absence of signs during a walkover survey does not, in isolation, confirm absence. However, the survey approach was based on both desk study information and habitat suitability assessment,

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		measures to avoid introducing disease or degrading potential crayfish habitats downstream.	including consideration of substrate, flow permanence, availability of stable refugia, bank structure, siltation and hydrological connectivity. The assessment identified no records of white-clawed crayfish within the Order Limits, no recent records within a 2 km search radius, and limited habitat suitability within affected watercourses within the Order Limits. The assessment also identified one 2005 record of invasive signal crayfish within a tributary of Hempnall Beck, approximately 1.5 km south-west of Site 3. Signal crayfish (<i>Pacifastacus leniusculus</i>) are a recognised threat to white-clawed crayfish, including through competition and the risk of crayfish plague (<i>Aphanomyces astaci</i>). This provides further context for the conclusion that white-clawed crayfish are unlikely to be present within or immediately adjacent to the surveyed reaches, while reinforcing the need for robust biosecurity controls. Impacts to ordinary water courses have been mitigated by a number of measures set out in the Outline CEMP [APP-196] including the establishment of a 10m buffer, surface water management activities, the avoidance of instream works and use of trenchless crossing techniques, the adoption of good practice techniques and the

ID	Theme	Representation	Applicant's Response
			appointment of both an Environmental and ECoW. Hempnall Beck and the tributary of the River Tas have also been identified as sensitive aquatic receptors and designated as Avoidance Areas within the Scheme design. These watercourses are hydrologically connected to the wider Tas catchment, where historic records of white-clawed crayfish have been identified outside the Order Limits. The avoidance measures secured for these watercourses, including trenchless crossing techniques, stand-off measures and launch and reception pits, to be located outside of the Avoidance Area, are therefore directly relevant to managing potential effects on white-clawed crayfish should the species be present within these watercourses or hydrologically connected downstream habitats. ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] includes the provision of method statements designed to avoid impacts upon aquatic habitats and associated species; these include <i>Method Statement 4: Pollution Prevention Measures</i>, <i>Method Statement 7: Precautionary Horizontal Directional Drilling (HDD) Methodology</i>, and <i>Method Statement 11: Specific Measures for</i>

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			<i>Invasive Non-Native Species</i>; which includes commitments to prevent the spread of signal crayfish/crayfish plague. The Applicant is satisfied that these measures combined will avoid or minimise potential effects on instream and bankside habitats used by white-clawed crayfish as well as reduce the likelihood of pollution, sedimentation and biosecurity issues affecting white-clawed crayfish or potential downstream habitat. This approach is considered proportionate because the existing evidence base indicates low habitat suitability within the Order Limits, no evidence of white-clawed crayfish within or immediately adjacent to the surveyed reaches, the presence of signal crayfish within the wider Hempnall Beck system, and secured mitigation for the watercourses where potential impact pathways would be most realistic. Notwithstanding, the Applicant notes the Examining Authority's request for further information and potentially for surveys to be carried out for White Clawed Crayfish between July – September, in the Rule 6 letter [PD-005]. Currently, no further white-clawed crayfish surveys have been completed in 2026 and no additional surveys are currently proposed within the remaining July to September survey window. This

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			is due to the ongoing drought conditions currently being experienced, which are understood to have resulted in hydrological conditions that are less suitable than those recorded during the original aquatic habitat surveys. Further survey at this time is therefore unlikely to provide a more representative assessment of typical habitat conditions and may further under-represent wetted extent, depth and in-channel habitat availability. The Procedural Deadline A update to the Examining Authority, will explain the survey approach taken, why further survey work is not currently proposed, and why the Applicant considers the existing evidence base and secured mitigation sufficient to inform the assessment of likely effects on white-clawed crayfish.
NCC-037	Cultural Heritage and Archaeology	Environmental Statement Volume 1: Chapter 10 – Cultural Heritage 4.48 10.4.2 – There is no detail for the cabling associated with the PV arrays. Therefore, the cumulative impacts of the piling and the cabling is not known, so any assessment of impacts of piling and cabling on below-ground is highly uncertain and provisional.	ES Chapter 1, Volume 19 – In-Combination Effects Assessment [APP-055] includes an assessment of in combination effects, including the effects on below-ground archaeology. Details in respect of the Solar PV Arrays and electrical cabling associated with the PV arrays has been provided within the Design Principles, Parameters and Commitments [APP-213]; and which inform the ES [APP-036 – APP-056]. Impacts from piling for the Solar PV arrays will be at a very low level, typically ranging between 0.1%

ID	Theme	Representation	Applicant's Response
			and 0.05% by area, depending upon the separating between rows. While it has been acknowledged within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], that full details of the amount and location of associating cabling is not yet available (to be determined at detailed design), it is recognised that during the construction and decommissioning phases of the Scheme, relatively low levels of below-ground disturbance are expected, depending upon the exact layout and construction methods that are to be utilised (typically in the region of 5%-7% of site area). Finally, it is further noted within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] as well as ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [APP-173], that trial trenching of all areas of impact of the Scheme at a level to be agreed with NHES that is proportionate to the overall impact of the scheme (i.e. to include the cumulative impact of piling and cabling). The option for localised areas of above-ground cabling to preserve significant archaeological remains <i>in situ</i> where it is not practicable or desirable to mitigate by archaeological excavation, will be available. Likewise, within the Solar PV Array areas of the

ID	Theme	Representation	Applicant's Response
			Scheme, the targeted and localised use of concrete feet rather than piles to support the Solar PV structures will also be available.
NCC-038	Cultural Heritage and Archaeology	4.49 10.6.9 – 10.6.37 The site discussed in this section is based on testing by trial trenching of areas of archaeological potential based purely on the results of the geophysical survey. There has been an insufficient level of trenching of areas of the overall scheme where the geophysical survey did not identify anomalies of potential archaeological origin, so called 'blank' areas.	The Applicant agrees that the works detailed in ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172] has primarily targeted areas where the geophysical survey (ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey Report [AS-022]) has identified archaeological potential, in addition to anomalies identified through aerial photography (ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024]), as well as existing entries on the Historic Environment Record, as detailed within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021]. While it is acknowledged that non-invasive survey works (e.g. geophysical survey and aerial mapping) are not infallible, and will not identify all feature types, it is, however, very useful in identifying the principal concentrations of archaeology, and there is no reason to believe this is not the case. As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation

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			Strategy [APP-173] , further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NHES that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the scheme.
NCC-039	Cultural Heritage and Archaeology	4.50 10.6.42 The County Council is in broad agreement with the ES Volume 3: Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]. There are however significant differences regarding: • The cumulative level of impact piling and cable for the solar arrays; and • The need to have some level of testing by trial trenching of all areas of the scheme not previously trenched.	The Applicant notes that paragraph 3.7 of ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] allows for trial trenching of all areas of impact of the Scheme at a level to be agreed with NHES that is proportionate to the overall impact of the scheme (i.e. to include the cumulative impact of piling and cabling).
NCC-040	Cultural Heritage and Archaeology	4.51 10.8.8 and 10.9.14 – There is no detail for the cabling associated with the PV arrays. Therefore, the cumulative impacts of the piling and the cabling are not known.	This has been addressed in detail under row NCC-037.
NCC-041	Cultural Heritage and Archaeology	4.52 10.9.6 – The County Council agrees with this, but it somewhat contradicts earlier statements around the impacts of piling.	The Applicant requests further clarification regarding how this contradicts earlier statements around the impacts of piling.

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			Further impacts regarding impacts of piling are detailed in NCC-037.
NCC-042	Cultural Heritage and Archaeology	Environmental Statement Non-Technical Summary [APP-194]. 4.53 10.4.2 – Potential impacts on below-ground archaeological remains from piling for PV panel mounting structures are not negligible. The cumulative impacts of the piling and cables will have an adverse impact on below-ground archaeological remains. The magnitude of the impact is in part dependant on the nature of the below-ground archaeological remains. 4.54 10.6.2 – The removal of piles will have a destructive effect on below-ground archaeological remains that will need to be mitigated at pre-construction stage.	In respect of 4.53, the Applicant notes that based upon the nature of archaeological remains identified thus far within the Order Limits, as detailed within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 - AS-021], ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024], and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172], the impact from piling alone, given the small size of individual piles and the spacing between each pile, would not compromise the integrity of the archaeological features, nor the ability to understand the 'archaeological site' should future archaeological investigation take place. It should also be noted that predicted impact of piling of 0.1% to 0.05% (which is calculated on the basis of double pile width to allow for disturbance from removal) is not an impact upon archaeology but the total below ground impact of the piling. Therefore, the majority of the piles are not likely to impact archaeology at all. It is for these reasons

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			that the impact of piling for the solar arrays has been assessed as negligible. Paragraph 3.7 of ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] allows for trial trenching of all areas of impact of the Scheme at a level to be agreed with NHES that is proportionate to the overall impact of the scheme (i.e. to include the cumulative impact of piling and cabling). In respect of 4.54, the Applicant further notes that as the impact of piling and cables will be mitigated prior to the Construction Phase, as outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], the removal of piles and cables (decommissioning phase) will have no further impact upon the archaeological resource.
NCC-043	Cultural Heritage and Archaeology	4.55 10.7.1 – The last sentence of this paragraph needs to be removed.	The last sentence of ES Non-Technical Summary [APP-194] states '<i>For construction, the Moderate Adverse (Significant) effect will be reduced to non-significance as a result of the Additional Mitigation Strategy proposed.</i>' This sentence summarises the below-ground impacts of the Scheme following mitigation, so does not need to be removed from [APP-194].
NCC-044	Transport and Access	4.58 Sites 1A to 2C – As per the initial comments at the PEIR stage, there should be only one access located on B1134 Station	Two accesses are proposed on B1134 Station Road to accommodate access to the BESS Site and Sub-Sites 1A-D. Two accesses are proposed

ID	Theme	Representation	Applicant's Response
		Road and all vehicles are to use CRC2 and CRC3 to access the individual sites. Haul route crossing facilities should be used to cross Lodge Road and Frith Way. No new/enhanced access is to be located on the A140 and HDD will be required under the A140.	to facilitate access to different land parcels and provide flexibility during construction where (subject to the final construction programme) works in different sites could potentially occur at different times. In addition, the following points are noted by the Applicant: • The highway crossing point for CRC2 on Frith Way is in close proximity to a roadside nature reserve located on the east of the crossing point on the north side of Lodge Road. In addition, a Great Crested Newt pond is located to the south of Frith Way/Lodge Road opposite the roadside nature reserve. On the basis of these constraints, it was considered less impactful to use the existing access in the layby on A140 rather than use CRC2 as a haul route to access Sub-Site 2B. • An avoidance area bisecting CRC3 (CRC3A) has been included due to the presence of trees, hedgerows, ditches and overhead lines along Carpenter's Walk. Carpenters Walk is also a private road and a ProW. This is shown in Appendix A, Sheet 17 of the Outline Cable Route Construction Statement [APP-216] and

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			detailed in Table 2.1, Page 7 of the Outline Cable Route Construction Statement [APP-216]. The avoidance of ditches is highlighted as a consideration relating to the cable route corridor on Page 65 of the Design Approach Document [APP-212]. As a result of this combination of factors, CRC3 is not considered feasible for use as a haul route between Sub-Site 2A and 2B. • Sub-Sites 2A and 2B have an existing access within a layby (northbound) on the A140. It is proposed that during construction each layby is closed to general traffic and only accessible to works vehicles with appropriate signage installed. This is considered to be the safest approach. Overlap between the closure of each layby would be kept to a minimum. • As stated in meeting minutes with NCC dated 15 October 2024 (detailed in Appendix E of the ES Volume 3, Appendix 11.1 -Transport Assessment (Part 4) [APP-177]), it was raised by the Applicant if there would be any challenges with sites in the south-west (Site 2) accessing directly from A140. It was noted by NCC that this would be feasible, however the access point

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			would need to be considered carefully alongside appropriate traffic management. It was also noted by NCC that the QE2 hospital scheme has agreed to left-in / left-out movements only for direct access onto A140. Left-in / left-out movements are proposed for site accesses on A140, alongside additional management and mitigation measures as detailed in Chapter 7 of the Outline CTMP [APP-201]. It has been agreed that trenchless crossing techniques such as HDD will be used on A140 (and B1527). Further information can be found in the Outline Cable Route Construction Statement [APP-216].
NCC-045	Transport and Access	4.59 Sites 3A and 3B – These should only be accessed either via Site 5B, utilising CRC6 and CRC5 or a new access on Alburgh Road connecting to CRC6.	Site 3A has been removed from the Scheme, retaining just Site 3B (now referred to as Site 3). One access is proposed to Site 3 on Alburgh Road, utilising an existing site access. Access to Site 3 via CRC6 is challenging due to ecological constraints and the use of trenchless crossing techniques. Two avoidance areas along CRC6 restrict its feasibility to be utilised as a haul route: CRC6B: Relates to avoiding the removal of trees and hedges located in an established

ID	Theme	Representation	Applicant's Response
			mature tree line that connect to established woodland blocks to the west and east of the tree line; and • CRC6C: Relates to the presence of a watercourse (Hemphall Beck), hedgerows and woodland. Avoids significant aquatic, hydrology and drainage impacts. The two avoidance areas CRC6B and CRC6C are shown in Appendix A, Sheet 11, of the Outline Cable Route Construction Statement [APP-216]. Information regarding avoidance areas is also detailed in Table 2.1, Page 6 of the Outline Cable Route Construction Statement [APP-216]. CRC6 in proximity to Site 3 crosses a field and tree line that contains several high value veteran trees. To reduce impact the CRC width will be kept to a minimum when passing the veteran trees. This restricts this section of CRC6 being used as a haul route. In addition, the field boundary between CRC6 and Site 3 contains hedges and trees that provide connectivity to the county wildlife site and ancient woodland located further to the east. Minimising impact at this location aligns with the broad design principles set out in Table 3.1, Page 41 of the Design Approach Document [APP-212]. Considerations relating to the cable route

ID	Theme	Representation	Applicant's Response
			corridor are also detailed on Page 65 of the Design Approach Document [APP-212]. Due to the ecological and environmental constraints with regards to utilising CRC6 as a haul route, the proposed access to Site 3 via Alburgh Road is considered to be the most suitable. The forecast peak daily trip generation to Site 3 is also not considered to cause a significant impact, resulting in a 3.34% increase on future baseline flows, as detailed in Table 9.2, Page 36 of ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174].
NCC-046	Transport and Access	4.60 Sites 4A and 4B – Sites 4A should be accessed from the A140 Hempnall Roundabout. Site 4B should use a single access point on the B1527 Hempnall Road or alternatively via CRC6.	NCC's position aligns with the current access strategy i.e. access to Sub-Site 4A is proposed via the existing access on Hempnall Roundabout, access to Sub-Site 4B via a single existing access on B1527. Sub-Site 4B also connects to CRC4 in the south east corner of the site. Construction routeing information can be found in ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174] .
NCC-047	Transport and Access	4.61 Sites 5A and 5B – Both sites should be served from a single access on the B1527, with internal routing between the parcels.	There are three proposed site accesses for Sites 5 – two on B1527 for 5A and one on The Street for 5B. Access A23 on the B1527 is a new access and is needed to accommodate AIL movements associated with the substation located in Site 5A. Where practicable construction vehicle movements

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			will be internalised between 5A and 5B. The three proposed accesses allow for flexibility during construction where (subject to the final construction programme) works in the different Sites could potentially occur at different times. Access A25 will also be used for accessing CRC6. Information regarding AIL movements is detailed in the Transport Assessment [APP-174] .
NCC-048	Transport and Access	4.62 Site 6 – Access from Alburgh Road is acceptable.	The Consultee's position aligns with the current access strategy as detailed in the Transport Assessment [APP-174] .
NCC-049	Transport and Access	4.63 Sites 7A to 7K, 8A to 8B and 9 – All sites should be accessed via CRC8, west of Hempnall, with internal haul routes or CRC connections to each individual site.	Several avoidance areas are located along CRC8: • CRC8A: Relates to avoiding the removal of trees and hedges located in an established mature tree belt that is part of the field boundary to Sub-Site 7K; • CRC8B: Relates to avoiding the removal of trees and hedges located in an established mature tree line that connects two SSSI's and ancient woodland blocks (Little Wood and Winter's Grove) located to the east and west of the tree line; and • CRC8C: Relates to avoiding a watercourse (tributary of Hempnall Beck), hedgerows and

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			trees. Avoids significant aquatic, hydrology and drainage impacts. The locations of these avoidance areas are shown in Appendix A, Sheet 8 of the Outline Cable Route Construction Statement [APP-216], and detailed in Table 2.1, Page 6 of the Outline Cable Route Construction Statement [APP-216]. Given the locations of the avoidance areas along CRC8, it is not proposed for this cable route section to be utilised as a haul route between Sites 7A-K, 8A-B and 9. Additional factors have also impacted the suitability of utilising CRC8 as a haul route. This includes potential constraints arising from the sequencing of the construction programme, and sites not being active simultaneously to facilitate access via a CRC8 haul route. The use of internal haul routes between sites has been proposed for Sites 7A-F, Sites 7G-L and Sites 8A-B. The Applicant has discussed the access strategy for these sites extensively and has sought to internalise vehicle movements along CRC and interconnecting sites wherever practicable as set out in the Technical Notes appended to the Transport Assessment [APP-174].

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			Due to the ecological and environmental constraints with regards to utilising CRC8 as a haul route, the proposed access routes and use of existing access points as set out in the Outline CTMP [APP-201] as considered the most suitable, alongside the proposed management and mitigation measures, also set out in the Outline CTMP [APP-201] .
NCC-050	Transport and Access	4.64 Sites 10A–10D should share a single access on Harvey Lane, with internal haul routes between parcels. Site 10E should be accessed via CRC14.	There are three proposed accesses to Sites 10 – two on Harvey Lane (for Sub-Sites 10A-D) and one on Ugate Road (for Sub-Sites 10E). The access locations have been proposed to allow for phased construction, and to facilitate flexible access to individual land parcels. Using CRC14 as a haul route to access Sub-Site 10E would require the removal of hedgerows that provide linear habitat connectivity and form the field boundary between CRC14 and Sub-Site 10E. Hedgerow removal at this location can be avoided by utilising the existing site access point on Seething Road. This is considered less impactful and therefore proposed, as detailed in ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177].
NCC-051	Transport and Access	4.65 While there have been extensive discussions regarding Sites 7–10 (north of	The Applicant wishes to continue the constructive dialogue with NCC highways officers to seek to

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		the B1527), the County Council considers that the current proposed transport strategy does not adequately address the significant highway constraints, nor provide sufficient mitigation. As a result, the current strategy cannot be supported.	reach agreement on an access strategy that can be supported.
NCC-052	Transport and Access	4.66 The expectation remains that all construction traffic will enter and leave onto appropriate standard roads, as outlined above, and that internal haul routes or CRCs will be used to access individual site. This has been the approach taken on other NSIPs.	The Applicant notes this comment and refers to its response to NCC-051.
NCC-053	Transport and Access	4.67 Horizontal Directional Drilling is required for all A and B roads affected.	It has been agreed that trenchless crossing techniques such as HDD will be utilised for roads, including A140, B1527 and B1332. This has been agreed in consultation with NCC as the Local Highway Authority and is shown in meeting minutes and post-meeting note dated 9 December 2025, within Appendix E (Page 16) of the Transport Assessment [APP-177] and is secured through the Outline CTMP [APP-201] . Further information can be found in the Outline Cable Route Construction Statement [APP-216] , which details the avoidance areas where trenchless construction techniques will be undertaken on A and B roads.

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NCC-054	Water Environment – Water Quality, Drainage and Flood Risk	4.69 The County Council, in its role as lead local flood authority (“LLFA”), considers that the application is currently incomplete due to inconsistencies and limited information provided to support the application. The application lacks information that demonstrates commitment to ensuring there is no increase in flood risk on site or elsewhere. In addition, the County Council advises that there are a number of instances where the information provided is unclear and clarification is required to understand what is being proposed. At present, it is not clear whether the proposed development is able to manage change in surface water runoff from areas of the site without increasing flood risk either onsite or elsewhere. Therefore, further information will be required. 4.70 The County Council has provided comprehensive comments in a letter to the applicant dated 24 April 2026. This letter is attached to this representation as Appendix 1.	Detailed responses have been provided against each detailed LLFA comment under rows NCC-069 to NCC-192.
NCC-055	Socioeconomics	4.74 An Outline Employment, Skills and Supply Chain Strategy [APP-205] (‘oESSCS’) has been prepared which it states sets the Applicant’s commitment to promoting	The detailed Employment, Skills and Supply Chain Strategy (ESSCS) to be prepared as per Requirement 19 of the draft DCO [AS-032] will be informed by continuous engagement with relevant

ID	Theme	Representation	Applicant's Response
		competition, innovation and skills within the communities surrounding the Scheme, as well as across the local authority area of South Norfolk and the wider county of Norfolk. It describes the anticipated workforce profile, skills, equipment, and services required to deliver the scheme. These measures require the engagement of relevant stakeholders. 4.75 A detailed Skills Supply Chain and Employment Plan will be prepared and submitted in accordance with the oESSCS prior to the commencement of construction activities, to be secured by a requirement (Requirement 19) in the draft Development Consent Order [APP-017]. 4.76 The County Council notes the proposals set out in the 'oESSCS' and will continue to work with the applicant to develop the Skills Supply Chain and Employment Plan.	stakeholders. The Applicant welcomes the opportunity to continue working with the NCC to develop it. The timeline for development of the dESSCS is set out in Table 7.1 of the Outline Employment, Skills and Supply Chain Strategy (Outline ESSCS) [APP-205].
NCC-056	Human Health	4.77 The County Council notes the applicant's response to previous feedback, and the detailed summary of human health impacts set out in the ES Volume 1: Chapter 18 – Other Environmental Matters [APP-054]. This summary offers a clear and accessible	The Applicant welcomes NCC's acknowledgement that the Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] provides a

ID	Theme	Representation	Applicant's Response
		overview of potential health effects and supports transparency in the assessment of the scheme.	clear and accessible summary of the Scheme's potential health effects.
NCC-057	Human Health	4.78 The County Council also notes the applicant's response to previous feedback through the inclusion of a more detailed assessment of mental health and wellbeing within the Equality Impact Assessment. However, the County Council notes the conclusion that "there is concern regarding the long-term potential mental health impacts of the scheme, particularly regarding elderly and more vulnerable populations" (Equality Impact Assessment [APP-214], paragraph 9, 9.1.8). Such mental health impacts may arise from a range of concerns, notably: "the impact of the Scheme on access to nature; visual amenity & attachment to place; fears or concerns regarding community safety regarding fire risks; the cumulative impacts of concurrent schemes and; fears or concerns regarding housing and business values" (Equality Impact Assessment [APP-214], Table 8.2. 4.79 Whilst the applicant concludes that the majority of these impacts will be reduced through embedded mitigation, it is likely that	The Applicant welcomes the NCC's acknowledgement that further consideration of mental health and wellbeing has been included within the Equality Impact Assessment [APP-214]. The assessment considers potential effects related to access to nature, visual amenity, attachment to place, perceived safety, cumulative impacts, and concerns regarding housing and business values, particularly for older and more vulnerable groups. The Applicant also notes NCC's comments on engagement and will continue to support affected communities through ongoing communication during construction. This will be facilitated through the Outline CEMP [APP-196], which includes measures for stakeholder engagement and communication. The requirement for a CEMP is secured through Requirement 13 of the DCO, providing a mechanism for maintaining engagement and responding to community concerns during construction. With specific regard to community liaison, this is directly secured through Requirement 4 of the draft DCO [AS-032] through the provision of a community liaison group. This group will act as

ID	Theme	Representation	Applicant's Response
		some residual impacts on local populations will remain. These should be noted. Many of these impacts can be minimised and addressed through clear and transparent communication. The County Council welcomes the applicant's commitment to "Continued engagement and monitoring regarding these community impacts...throughout the construction phase... Dedicated communications lines will remain open, via registration, email, or phone, which are monitored by stakeholder correspondence teams." (Equality Impact Assessment [APP-214], Table 8.2). However, the County Council considers that this approach should be more proactive and outreach-based, rather than relying primarily on passive communication channels, to ensure that all affected groups are effectively engaged. The proposed mitigation should be amended in accordance with the above.	an intermediary between the public and the construction contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.
NCC-058	Noise and Vibration	4.80 In relation to noise and mental wellbeing, the County Council notes that the applicant determines that during the schemes operation "For residential receptors...during early morning periods, limited exceedances of the NOAEL ["No Observed Effect Level"] are predicted at a small number of residential	The following commitments are included in the Outline OEMP [APP-197]: Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048].

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		receptors, with effects ranging from low to, in a few cases, moderate adverse prior to mitigation" (ES Volume 1: Chapter 18 – Other Environmental Matters [APP-054], paragraph 18.6.166). Mitigation in these instances is essential, and the County Council considers that appropriate mitigation measures should be secured and clearly defined for all affected receptors.	- The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on ProWs will not exceed 55 dBA. Based on these commitments, appropriate mitigation measures are secured and will be implemented.
NCC-059	Human Health	4.81 Furthermore, the County Council notes the applicant's conclusion that "Changes to landscape character and visual amenity represent the principal pathway through which operational effects on health could occur, particularly in relation to mental wellbeing, sense of place and perceived environmental quality" (the ES Volume 1: Chapter 18 – Other Environmental Matters [APP-054], paragraph 18.6.258). The County Council welcomes the commitment to mitigation strategies such as planting and landscape management, to be secured through the Outline Landscape and Ecology Management Plan ("oLEMP") [APP-199].	The Applicant welcomes the County Council's acknowledgement of the assessment of operational health and wellbeing effects and the mitigation measures secured through the Outline LEMP [APP-199] .
NCC-060	Transport and Access	4.82 The County Council notes that no ProW require long term closure, but that some temporary restrictions, often longer than a month, are required. The County Council	As detailed in the Outline PRowPPMP [APP-203] , some medium-term closures are anticipated on select PRow routes. No long-term closures are

ID	Theme	Representation	Applicant's Response
		recommends that such closures are implemented only where strictly necessary, with suitable alternative routes provided and clear communication to affected users.	anticipated, as all existing ProW will reopen once construction in the respective area is complete. Where medium-term closures are anticipated, diversionary routes will be provided where practicable to ensure public access is maintained during construction works. Diversionary routes are detailed in Table 4.2 of the Outline ProWPPMP [APP-203] and these routes will be developed further and agreed with NCC's ProW Officer and documented in a detailed ProW and Permissive Paths Management Plan to be secured by DCO Requirement, alongside further management measures. In any event, the powers under the DCO in respect of temporary closure, restriction or prohibition of use of public rights of way is inherently limited. For example, it cannot be exercised without first consulting the street authority (in respect of the specified streets PRoW in Schedule 5) or without the consent of the street authority (for any other PRoW). See Article 12 of the draft DCO [AS-032].
NCC-061	Ground Conditions, Contaminations and Materials	4.84 The County Council has been involved in discussions with the applicant's consultants regarding mineral resources and the potential for impacts from the proposed scheme (as noted in Table 16.2, in the ES	Matters will be recorded as part of the SoCG process.

ID	Theme	Representation	Applicant's Response
		Statement Volume 1: Chapter 16 – Ground Conditions [APP-052]. 4.85 Chapter 16, paragraph 16.5.8 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. 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 4.4.1 of the ES Non-Technical Summary [APP-194] states that “The Scheme is anticipated to have an operational life of 60 years”.	
NCC-062	Ground Conditions, Contaminations and Materials	4.86 Following on from the County Council's response to the scoping report, it is pleased to note that the Mineral Resource Assessment (“MRA”), ES Appendix 16.2 [APP-187], contains at Table 3.1 information showing the underlying geology within each sub-site, or CRC. Table 3.3 of the 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-sites for the panels, will be sterilised for the duration of the Scheme. However, this sterilisation is	The Applicant notes this comment, and this position will be recorded within the SoCG.

ID	Theme	Representation	Applicant's Response
		temporary and would cease following the decommissioning of the Scheme in 60 years' time. Paragraph 3.3.2 notes that the BESS, the National Grid Substation and the Point of Connection ("POC") are not underlain by a safeguarded mineral resource.	
NCC-063	Ground Conditions, Contaminations and Materials	4.87 The County Council considers that the ES 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 18.5.5 of the ES Non-Technical Summary [APP-194] 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 has also been applied to arisings from excavations such as the cable route through both the SWMP and the Soils Management Plan/Soils Resource Management Plan. The County Council considers that for this scheme ground investigations can take place as a requirement post-consent and feed into the Outline Construction Environmental Management Plan regarding potential reuse	The Applicant notes this comment, and this position will be recorded within the SoCG.

ID	Theme	Representation	Applicant's Response
		of materials arising during the construction phases. The table on page 22-24 of Chapter 16 (Ground Conditions) of the PEIR outlines the steps that have been agreed between the applicant and the County Council regarding information to be provided, and the methodology for the reuse of mineral excavated in the construction phases.	
NCC-064	Waste	4.88 The County Council has also examined Chapter 18 of the ES [APP-054], in relation to waste and materials (section 18.5). The County Council raised concerns at the scoping stage regarding the regional scale at which the baseline landfill capacity was assessed. The County Council is pleased to note that paragraph 18.5.41 contains information on landfill capacity within Norfolk. However, in paragraphs 18.5.53 and 18.5.54, the County Council disagrees with the assumption that should non-hazardous landfill capacity reach zero then new landfills will be approved. In Norfolk, the underlying geology makes much of the county unsuitable for hazardous or non-hazardous landfills, and it cannot be assumed that new capacity would be suitable to be approved within the county.	The Applicant confirms it has assessed baseline void capacity for non-hazardous landfill across the East of England region, to reflect the likely geographic area that waste from the Scheme may be handled. Upon request by Norfolk County Council at EIA Scoping Stage, the Applicant included specific information of non-hazardous landfill capacity and waste handling capabilities within Norfolk. This is presented in ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054]. In respect of assessing future landfill capacity, there is no publicly available information about changes to landfill capacity by the time construction of the Scheme is complete. The Applicant considers it is not a reasonable position to assume, that there would be no void space at all in the East of England in future due to the continued need for landfill capacity and the creation of void capacity through new mineral

ID	Theme	Representation	Applicant's Response
			extraction sites. The Applicant here notes that this assumption is for the entirety of the East of England, not just Norfolk. The Applicant has therefore assessed future waste outflows from the Scheme against current provisions, although clearly acknowledges that the quantum of void capacity in future will not be equal to current conditions. Due to this lack of long-range forecasting for both inert/non-hazardous landfill void capacity space, it has been considered that void capacity during the operational phase of the Scheme would be medium sensitivity, and during the peak replacement and decommissioning phases would be very high sensitivity to additional pressures. National void capacity for hazardous capacity is considered very high sensitivity at all phases of the Scheme. The Applicant believes this is a proportionate approach given the uncertainty surrounding future landfill void capacity both for inert/non-hazardous and hazardous waste. The Applicant nevertheless has committed to minimising waste through the application of the waste hierarchy and the provision of a Site Waste Management Plan through the Outline CEMP [APP-196], secured by Requirement 13 of Schedule 2 to the draft DCO [AS-032].

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NCC-065	Ground Conditions, Contaminations and Materials Waste	4.89 In conclusion, the County Council considers that the issue of mineral resource safeguarding has been correctly addressed in the ES, and that the embedded mitigation 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. 4.90 The County Council notes the additional details included in the ES regarding waste, and that the scheme will prioritise waste prevention, followed by reuse, recycling and recovery, in accordance with the waste hierarchy. The County Council considers that it is not possible to be certain that additional non-hazardous landfill capacity would be approved in Norfolk due to the lack of suitable geology within the county for such operations.	The Applicant is pleased to have reach agreement with NCC on the impact of the Scheme on safeguarded mineral resources. The Applicant is also pleased to have reached agreement with NCC regarding the Applicant's commitment to minimising waste through the application of the waste hierarchy and the provision of a Site Waste Management Plan through the Outline CEMP [APP-196], secured by Requirement 13 of Schedule 2 to the draft DCO [AS-032]. Please refer to the Applicant's response to NCC-064 which sets out the response to approach to future landfill capacity.
NCC-066	Battery Safety	4.91 The County Council is the fire and rescue authority for Norfolk and oversees the operation of Norfolk Fire and Rescue Service ("NFRS"). The County Council expects compliance with all points on the National Fire Chiefs Council's ("NFCC") guidance document Grid scale energy storage system planning – Guidance for fire and rescue	Section 2 of the Applicant's Outline BSMP [APP-200] documents communications (to date) with Norfolk Fire and Rescue Service (NFRS). The Applicant confirms that the Outline BSMP [APP-200] and the BESS site design is fully compliant with NFPA 855 (2026) and revised NFCC Guidance (2026). The commitment to the plan is

ID	Theme	Representation	Applicant's Response
		services (V2) and relevant parts of NFPA 855 Standard for the Installation of Stationary Energy Storage Systems in respect to provision of a robust battery safety management plan and suitable control measures to ensure safe operation of the site.	secured through Requirement 6 in Schedule 2 of the draft DCO [AS-032] .
NCC-067	Transport and Access	4.92 In relation to The ES Volume 1: Chapter 11 – Transport and Access [APP-047], Section 3.1.1 – the County Council confirms that it accepts the statement regarding two directions of access.	The Applicant welcomes continued discussions with NCC. Matters will be recorded as part of the SoCG process.
NCC-068	The Scheme	5.1 Norfolk County Council has both a specific interest in articles of the draft development consent order (“DCO”) which affect our statutory functions and a broader interest in ensuring the DCO is well-framed and fit for purpose. Due to the complex nature of statutory instrument drafting, the County Council reserves the right to make further detailed representations on the drafting of the DCO at later deadlines, in particular in the LIR and at any ISHs concerned with the DCO.	The Applicant welcomes further engagement with NCC on the draft DCO [AS-032] and notes that further representations on this matter may be forthcoming.
<i>Applicant's response to NCC LLFA comments</i>			

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NCC-069	The Scheme	ES Chapter 1 – Introduction 1. No comments, although the LLFA notes the introduction does have a sense of ambiguity to in the information. For example, while there is reference to the to the size and scale of the project, there is no statement of the production capacity of the scheme only that it is larger than 100 MW. Also, while there is identification of the sites and the references to village locations there is no indication as to the expansiveness of the proposed development. In addition, there appears to be some uncertainty around the lifetime of the scheme “with an assumed decommissioning date of 2091.” It is not clear from the information provided why there is uncertainty over this date. Further clarification would be appropriate.	The introduction is intentionally written in more general terms to provide an initial indication of what comprises the Scheme. For example, the reference to the larger than 100MW is to align with the wording in Section 15 of the Planning Act 2008, to confirm that the scheme falls within the NSIP consenting framework. The DCO then defines the authorised development more precisely, including the parameters, design envelope and approved plans; as well as the lifetime of the Scheme (up to 60 years). For example, the scope of the works powers are set out in Schedule 1 of the draft DCO [AS-032] and will be subject to the Requirements in Schedule 2. Further information on site design and infrastructure is provided in ES Volume 1, Chapter 4 - The Scheme [APP-040] and Design Principles, Parameters and Commitments [APP-213]. The Scheme must accord with the Design Principles, Parameters and Commitments pursuant to Requirement 5 of the draft DCO [AS-032]. The size and scale of the development has been depicted within the Location Plan [APP-005] and Works Plan [AS-002 and AS-003] and secured by Article 3 of the draft DCO [AS-032]; and the extent

ID	Theme	Representation	Applicant's Response
			of the site is described in ES Volume 1, Chapter 3 - The Order Limits [APP-039]. ES Volume 1, Chapter 4 - The Scheme [APP-040], includes the following text clarifying the date of 2091 is in line with the proposed 60-year design life of the scheme: <i>'Decommissioning is expected to occur after the 60-year design life of the Scheme in 2091 and take between 12 and 24 months.'</i> (para.4.6.1). The Applicant is seeking a time-limited consent for the Scheme to have an operational period of up to 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 21 in Schedule 2 of the draft DCO [AS-032]. In other words, flexibility is retained to allow for decommissioning (with the exception of the National Grid Substation and the Grid Connection Infrastructure), prior to the expiry of 60 years, but with a 60-year maximum operational lifetime secured to ensure that the consent is not indefinite.
NCC-070	The Scheme	Appendix 1.1 – Location of Information 2. No comments at this time	The Applicant notes this comment.
NCC-071	EIA Methodology	ES Chapter 2 – EIA Methodology The LLFA notes there appears to be an inconsistency in the temporary scope	Paragraph 2.8.6 of ES Volume 1, Chapter 2 - Environmental Impact Assessment Methodology [APP-038] clearly sets out the assessment scenarios and development phase durations that have been considered in the

ID	Theme	Representation	Applicant's Response
		for the Construction Phase. In chapter 1 (section 1.3.1), the construction phase is estimated to be approximately 24 months, although it is noted based on the dates given it is possible for construction to extend into a third year. However, in chapter 2 Methodology, section 2.8.1 does not provide any indication of the temporary scope. While in section 2.8.2 for the Operational and Maintenance Phase identifies time scales that indicate the construction phase of 2 to 3 years would be considered a medium term effect. While section 2.8.4 for the Decommissioning Phase Effects, again there is no identification of the temporary scope for this phase in relation to whether it is short, medium or long term. The LLFA does note that in sections 2.8.5 to 2.8.7 there is a more detailed discussion of the assessment years, although these do not appear to link back to the use of short, medium, or long term effects in the previous sections. There is a disconnection between these different considerations of the time periods and phases of the development and the LLFA is concerned about the potential for a lack of	Environmental Impact Assessment. In respect of construction, it states: <i>'Construction in 2028-2030. The peak construction year for the purpose of the EIA is anticipated to be 2029. This assumes commencement of construction in 2028 and that the Scheme is built out over a 24-month period.'</i> ES Volume 1, Chapter 4 - The Scheme [APP-040], includes the following text regarding the construction phase: <i>'The construction of the Scheme is anticipated to commence in 2028 for a period of approximately 24 months. On this basis, it is expected that the Scheme could be completed by 2030 and energised in 2031. However, the construction period will vary depending on detailed layout design and potential environmental constraints on the timing of construction activities.'</i> Construction effects are temporary in nature and considered short-term. ES Volume 1, Chapter 4 - The Scheme [APP-040], includes the following text regarding the operation and maintenance phase: <i>'The Applicant is seeking a time-limited consent with respect to the operation of the Scheme, which will start from the date of the final commissioning phase of the Scheme. The operational life of the Scheme is anticipated to be 60 years.'</i>

ID	Theme	Representation	Applicant's Response
		clear and consistent information in the methodology which may impact the remaining technical chapters of the report. Further clarification and information is required.	ES Volume 1, Chapter 4 - The Scheme [APP-040], includes the following text regarding the decommissioning: <i>'Decommissioning is expected to occur after the 60-year design life of the Scheme in 2091 and take between 12 and 24 months. A requirement to decommission the Scheme is secured via a Requirement in the draft DCO [APP-3.1].'</i> Decommissioning effects are temporary in nature and considered short-term. The assessment years define the assessment scenario being considered for the Environmental Impact Assessment, whereas the temporal scope considers the duration of the effect. The duration of the effect may not be relevant for the entirety of the phase of development being assessed.
NCC-072	EIA Methodology	4. In section 2.8.2, the applicant identifies that there are two types of long term effects; reversible and permanent. While in the Decommissioning phase effects (section 2.8.4), there focus is on the short term effects associated only with the decommissioning activities. While in sections 2.8.5 to 2.8.7 it is noted there is information relating to the years associated with each of the phases assessed. It continues to not be clear within sections how the long term effects in the Operational and Maintenance Phase Effects	The Applicant refers to its response to NCC-071.

ID	Theme	Representation	Applicant's Response
		section relate to the Decommissioning Phase Effects. Further clarification is required.	
NCC-073	EIA Methodology	5. The LLFA notes that a future baseline has been provided for the construction period. However, there is no future baseline for the operational and decommissioning phases that appear to be included in either the temporary Scope section or the Table 2.1 Technical Chapter Format and Content summary. Therefore, it is not clear to the LLFA how a comparison of the effects with and without the development on these different temporary periods can be evidenced. Further clarification and information is required.	The future baseline considers the baseline of the order limits, in a scenario where no development is progressed. The future baseline is based on the construction period, which represents the first phase of the development and therefore provides the most reliable basis for predicting future conditions. <i>'Future baseline (no development) in 2028 – 2030, which are the expected scheme construction years'.</i> (paragraph 2.8.6, 2nd bullet point).
NCC-074	EIA Methodology	6. In section 2.11.3, the applicant states that "due regard" will be given to "Effect duration and whether effects are temporary, reversible or permanent". However, it is not clear to the LLFA which durations will be applied due to the inconsistencies previously discussed in relation to the temporary scope sections for each of the developmental phases. Further clarification and information is required.	The Applicant refers to its response to NCC-071.
NCC-075	EIA Methodology	7. In relation to the definitions of sensitivity in section Table 2.2, the LLFA note that "High" includes both national and international	The approach taken means that 'high' sensitivity is applied if the receptor/resource is either of national

ID	Theme	Representation	Applicant's Response
		importance. This is not a typical approach as normally there is a sensitivity class for each of the national and international importance. While in "Medium" sensitivity it states: "the receptor is of high importance", however, there is no clear indicator provided of what is considered to be high importance and why a receptor of high importance would equate to being of medium importance. Further work and clarification is required.	importance or international importance. It is therefore considered suitably precautionary. Table 2.2 references 'Examples of Receptor', although further details are provided within the methodology sections of each discipline chapter. In other words, Table 2.2 serves as an overview of the general EIA approach which is then applied with more specificity in each individual chapter.
NCC-076	EIA Methodology	8. In relation to the definitions of Magnitude of impact in section Table 2.3, the LLFA note the applicant infers the magnitude is considered in relation to adverse impacts. However, in Table 2.4, the applicant considers the effect significant as both Adverse and beneficial. Therefore, there are some inconsistencies within the definitions that require further consideration and amendments. Further work is required.	The definitions provided for assessing the magnitude of impact within table 2.3 consider the magnitude in relation to beneficial and adverse impacts.
NCC-077	The Order limits	9. In section 3.2.1 there is an inconsistency. In section 3.2.1, bullet point 2 which identifies the locations of Solar PV panels on potentially 33 sites, each with multiple fields included in an area, it is not clear whether site 6 is a Solar PV site as it is included in the	Section 3.2.1 defines the sites as: <i>'The Sites are the areas collectively containing the Solar PV Panels, associated infrastructure including Grid Connection Infrastructure,</i>

ID	Theme	Representation	Applicant's Response
		list of Solar PV sites or whether it is solely for environmental mitigation. If it is solely for environmental mitigation, it should be removed from the Solar PV site list. Further clarification and information is required.	<i>landscaping, heritage, surface water <u>and biodiversity mitigation areas.</u></i> (Our emphasis). In defining Site 6, the bullet point list at Section 3.2.1 explicitly states: <i>'Site 6 (this excludes Solar PV Panels and is given over entirely to biodiversity mitigation)'</i>
NCC-078	The Order Limits Water Environment	10. The LLFA notes that in section 3.4.25 to 3.4.29, the applicant has focused the description of Water Resources and flooding on flood zones that are associated with main rivers and modelled ordinary watercourses. There is no consideration of other sources of flood risk such as surface water. Furthermore, the consideration of water resources focused only on the presence of main rivers and modelled ordinary watercourses. There was no consideration of other well defined water resource bodies such as groundwater bodies like aquifers. This section of the ES Chapter 3 appears to be very narrow and does not consider all sources or, at the very least, all the likely sources in accordance with the principles of NPPF. Further work is required.	ES Volume 1, Chapter 3: The Order Limits [APP-039] provides 'Key environmental and planning constraints within and surrounding the Order Limits' (paragraph 3.4.1); further details surrounding water environment baseline conditions is provided within ES Volume 1, Chapter 9 - Water Environment [APP-045] .
NCC-079	The Scheme	11. The LLFA notes there is a very limited amount of information provided in some of	Details of the proposals within each Works No. are further provided in Design Principles ,

ID	Theme	Representation	Applicant's Response
	Works Plan	the Works Areas description such as for Works No 8, 10 and 11. Furthermore, in section 4.2.17, the applicant identifies various “associated development” features that includes “trenching and swales; irrigation systems; drainage systems; services and utilities connections; means of access; security and monitoring measures; improvement, maintenance and use of existing private tracks;” for “construction, operation and maintenance, or decommissioning phases of the Scheme”. The LLFA notes these associated works will vary for each of the works packages and should be included in the works descriptions. The lack of information, combined with the high level summary of supporting infrastructure within the associate development section, has resulted in an unclear description of the proposed development works. The LLFA seeks further information to be included in each of the works descriptions about the necessary supporting infrastructure. Further information is requested.	Parameters and Commitments [APP-213]. This is secured through Requirement 5 of the draft DCO [AS-032]. ES Volume 1, Chapter 4 - The Scheme [APP-040] section 4.3 provides a detailed description of the Scheme components that sit within the Works ‘areas’.
NCC-080	Works Plan	12. The LLFA also notes there are inconsistencies between the works description in Chapter 4 and the Works Plan	The Applicant notes this comment.

ID	Theme	Representation	Applicant's Response
		references to the Works descriptions. Further discussion on this concern is provided in the LLFA's comments on the Works Plan.	
NCC-081	The Scheme	13. The LLFA notes the flexibility requested through the application of the Rochdale Envelope by the applicant on the "arrangement" of all substations (132kv, 400 kv and National Grid), the conversion units, the Solar PV panels and the BESS. The LLFA notes the applicant provides a definition of associated development in section 4.2.20 in that is different to that given in section 4.2.17. In section 4.2.17, the definition focuses on the supporting infrastructure such as drainage, services and utilities, means of access, while in section 4.2.20, the focus is stated as "Associated Development such as the BESS Compound, 132 kV Substations, 400 kV Substations and new National Grid Substation". It is not clear which definition of associated development is appropriate for use. Further clarification and information is required.	The precise scope of the associated development is set out in Schedule 1 of the draft DCO [AS-032]. That schedule makes it clear that Work No. 2 to Work No. 11 (inclusive) comprise the associated development within the meaning of section 115(2) of the 2008 Act. Sub-paragraphs (a) to (q) then list further associated development in connection with and in addition to Work Nos. 1 to 11. This includes each of the elements of the scheme referred to by NCC. Also, ES Volume 1, Chapter 0 – Contents, Glossary and Abbreviations [APP-036], provides the following definition of associated development, within the table listing Definitions of Frequently Used Terms; <i>'Development associated with a ground-mounted solar photovoltaic generating station, including but not limited to the Battery Energy Storage System (BESS); Project Substations; Grid Connection Infrastructure, the new National Grid Substation) and Ancillary Infrastructure integral to the construction, operation (and maintenance) and decommissioning of the Scheme.'</i>

ID	Theme	Representation	Applicant's Response
			The Design Principles, Parameters and Commitments [APP-213] provides the following in reference to associated development: ' <i>associated development within the meaning of section 115(2) of the 2008 Act.</i> '
NCC-082	The Scheme	14. Furthermore, it is not clear what is meant by "arrangement" in relation to section 4.2.20. It is not clear whether is in relation to the location and layout or the design type of the development. Further clarification is required.	Arrangement refers to both the location and layout and the design type. The Design Principles, Parameters and Commitments [APP-213] , states that; ' <i>The Environmental Impact Assessment (EIA) for the Scheme has been undertaken based on the parameters and commitments set out within this document.</i> ', providing clarification on the aspects assessed. The Works Plan [AS-002 and AS-003] set out the areas within which the various works numbers, including the associated development under Work Nos 2-11, may be delivered. The precise layout and location (or "arrangement") will be finalised at detailed design stage. For example, see Requirement 5(1) which requires the final layout to be approved, with such final layout to accord with the design principles, parameters and commitments.
NCC-083	The Scheme	15. In Table 4.1, the Solar PV Arrays it is stated that "All electrical infrastructure associated with the panels (excluding cabling) will be elevated by the Mounting Structures so that it is no less than 300mm above the 1 in 100 (1%) Annual Exceedance	The Applicant notes this comment.

ID	Theme	Representation	Applicant's Response
		Probability (AEP) flood level; or, where this is not possible, as high as practicable." This is supported by the repeated statement wording being made in section 4.3.17 where no further information is provided.	
NCC-084	The Scheme Design Principles, Parameters and Commitments Water Environment	16. It is not clear to the LLFA whether the surface water freeboard allowance would also be included to ensure the avoidance of surface water flooding. Section 18.1.3 of the LLFA Developer Guidance is clear that "The LLFA would expect that there would be a minimum of at least 150mm freeboard between proposed external ground levels and property FFL." At present, it is not clear if this requirement is accounted for in the proposed parameters for the development. Further information is required.	The referenced LLFA Developer Guidance recommendation for 150mm is understood to be focussed primarily on new buildings for habitation, which has a different degree of flood risk to the works over the proposed solar scheme. The requirements for freeboard above surrounding ground have been taken into consideration for the site infrastructure elements (i.e. standalone inverter/converter units/switchgear) and is typically based on a minimum 100mm freeboard above proposed surrounding ground levels, with flood resilient elements of the construction included where necessary at a lower level. This will be confirmed at the detailed design stage.
NCC-085	The Scheme Water Environment	17. In Table 4.1, the applicant indicates that "concrete feet or other non-ground penetrative techniques will be used to secure the Mounting Structures". The LLFA is unclear whether the concrete feet or other non-ground penetrative techniques would only be used in areas of archaeological protection, or whether there would be other occasions for selecting these for use.	Concrete feet or non-penetrative techniques will be used to secure Mounting Structures in areas where archaeological protection is required, as set out in the Design Principles, Parameters and Commitments [APP-213] . Where single axis tracker panels are used in areas where there is a need for non-invasive foundations in areas of archaeological protection, a fixed tilt system would be used. Illustrative details of concrete feet and

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		Furthermore, the LLFA seeks clarification on the appropriate size of the potential concrete feet and the associated surface water drainage needs for this potential additional increase in impermeable area. Further information and clarification is required.	their typical dimensions will be submitted into the Examination Deadline 1 via an update to ES Volume 3: Appendix 4.1 – Illustrative Technical Information. There may be limited circumstances where ground conditions at certain locations may not be conducive to piling. This will be subject to ground investigation at the detailed design stage. Notwithstanding, the use of concrete feet, or other non-invasive construction methods is not a preferred option for the developer.
NCC-086	The Scheme	18. <i>Informative</i> – The LLFA reminds the applicant that Deer Fencing on the perimeter of the PV Array areas will not be accepted in a watercourse channel due to the increased risk of blockage to flow that it would cause.	It is not proposed to locate deer fencing within watercourse channels. The Design Principles, Parameters and Commitments [APP-213] document states that the: <i>'Deer fence will be a maximum height of 2.5m above ground level around individual fields or groups of fields.'</i>
NCC-087	The Scheme Water Environment	19. In relation to information provided in Table 4.1 for the Standalone Conversion Units, there is inconsistent discussion and consideration of the impermeable area and the required surface water attenuation and drainage for each of these features included in the table. On further review of the information provided in relation to the Standalone Conversion Units, in sections 4.3.18 to 4.3.21, the LLFA notes there is	Image 4.3 is a schematic depicting an 'Integrated Conversion Unit.' Image 4.4 depicts a 'Typical Standalone Conversion Unit' and is not an accurate representation of the proposed impermeable area proposed. Section 9.8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Strategy [AS-018] outlines indicative arrangements for the standalone converter/inverter units. This will be refined through the detailed

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		reference to the inclusion of “a thin layer of gravel” (in section 4.3.19) and then a typical example is provided in Image 4.3 and 4.4. However, the “thin layer of gravel” appears to be continuous with the permanent access track and of the same compacted material. The LLFA would consider this material to act as an impermeable area that would increase surface water runoff that would require surface water management measures to be included. Further work and information is required.	surface water drainage design which is secured through Requirement 11 of the draft DCO [AS-032] .
NCC-088	The Scheme Water Environment	20. In relation to information provided in Table 4.1 for the Integrated Conversion Units / 33 kV Sub-distribution Switch Rooms and section 4.3.22, there is no discussion on the typical foundations to be expected. However, it is clear there is an increase in the impermeable area associated with the structure and there is no discussion on the typical surface water management arrangements to prevent an increase in flood risk. Further information is required.	Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Strategy [AS-018] outlines indicative arrangements for the standalone converter/inverter units. This will be refined through the detailed surface water drainage design which is secured through Requirement 11 of the draft DCO [AS-032] .
NCC-089	The Scheme	21. In Image 4.1, the LLFA notes there is poor vegetation growth around the typical single tracker panels. While in Image 4.2, a healthy vegetation growth is shown around the fixed panels. The LLFA seeks further	The Outline LEMP [APP-199] includes a commitment to providing ‘ <i>Implementation timetables for all landscape planting and ecological measures</i> ’ as part of the final LEMP. The LEMP will be created prior to implementation of the

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	Landscape and Visual	information to confirm that suitable vegetation growth would be in place prior to the placement of the PV tracker panels to ensure the surface water runoff from the panel is suitably managed. There is no information provided in the supporting text about whether the vegetation growth is established before the panels are fitted and operational. Further clarification is required.	Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the draft DCO [AS-032] .
NCC-090	The Scheme Water Environment	22. Sections 4.3.26 to 4.3.31 provides a description of the proposed BESS facility. However, there is no discussion or mention of the necessary surface water runoff management and attenuation to prevent an increase in surface water flood risk. In section 4.3.28, the applicant notes the base is likely to consist of either re-enforced concrete foundation slab, or concrete piling for the BESS equipment. However, in section 4.3.26, the applicant has indicated that they do not know the number or size of the battery storage enclosure. Due to the nature of this construction, it is understood the wider compound, access tracks and hard standing would also create additional impermeable areas that would increase the rate of surface water runoff. While it is acknowledged by the LLFA that the proposed development is at an	The outline surface water drainage strategy for the BESS is set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], with detailed surface water design secured through DCO Requirement 11. Design Principles, Parameters and Commitments [APP-213] at Table 4.2 confirms the maximum extent of the BESS compound area as up to 6.5 ha; and provides other details in respect of the height of BESS containers and the dimensions of the control building. In addition it states: • The BESS Compound will be served by a sustainable drainage network designed to

ID	Theme	Representation	Applicant's Response
		early stage in the design development, there should be 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 measures in place to prevent an increase in flood risk. Further information is required.	the 1% AEP event plus 45% climate change allowance. • The BESS Compound will consist of a bunded impermeable surface or other form of containment system to manage surface water drainage. • The BESS Compound will include a bunded impermeable surface or other form of containment system and associated infrastructure to contain used firewater.
NCC-091	The Scheme Water Environment	23. In section 4.3.33, the LLFA notes the 132kV Substations would increase in impermeable area associated with infrastructure such as the transformers, switchgears / switch rooms, control units and access tracks and hardstanding (as depicted in Image 4.8). It is not clear from the description where this infrastructure will be placed or whether they would be single or double substations, which would significantly increase the impermeable areas and the associated surface water runoff. At present, there is no mention of surface water management for these structures. The LLFA in accordance with NPPF requires there to be no increase in flood risk from the proposed development on site or elsewhere. While it is	Design Principles, Parameters and Commitments [APP-213] Table 4.3 states there will be the following 132kV Substations in the Scheme: • Sub-Site 4B: maximum compound area up to 0.5ha. • Project Substation in Sub-Site 7F: maximum compound area up to 0.75ha. • Project Substation in Sub-Site 10C: maximum compound area up to 0.5ha. The location of these are shown as Work No. 3B on the Works Plan [AS-002 and AS-003]. The outline surface water drainage strategy for the 132kV Project Substations is set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk

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		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 measures in place to prevent an increase in flood risk. Further information is required.	Assessment and Outline Surface Water Drainage Strategy [AS-018] , with detailed surface water drainage design secured through DCO Requirement 11.
NCC-092	Water Environment	24. Similarly, in section 4.3.34 to 4.3.36, the LLFA notes the 400kV Substations which includes control units, access tracks, hardstanding, office space and welfare facilities, would increase the impermeable area with infrastructure along with the transformers and switchgears. It is not clear from the description whether surface water management infrastructure has been included in the would significantly increase the impermeable areas and the associated surface water runoff. At present, there is no mention of surface water management for these structures. As previously stated, the LLFA in accordance with NPPF requires there to be no increase in flood risk from the proposed development on site or elsewhere. While it is acknowledged by the LLFA that	The outline surface water drainage strategy for the 400kV Project Substations is set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] , with detailed surface water drainage design secured through DCO Requirement 11.

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		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 measures in place to prevent an increase in flood risk. Furthermore, it is not clear what arrangements are proposed for the collection and discharge of foul water from the site. Further information is required.	
NCC-093	The Scheme Water Environment	25. A new national grid substation is included within this proposed scheme as described in section 4.3.1 and 4.3.2 along with a new grid connection (section 4.3.3 to 4.3.8). At present, no design has been provided, the location is indicative and is "assumed to have a footprint of up to 6 ha." This is a significant increase in footprint area on the initial consultation which indicated an assumed footprint of 3 ha. It is not clear from the text provided what has led to the increase in the area. Furthermore, there is no discussion on the inclusion of sustainable drainage or demonstrate that suitable space has been provided for the inclusion of sustainable drainage to prevent an increase in flooding	The Scheme has been assessed on the principles of the Rochdale Envelope, and as such the Design Principles, Parameters and Commitments [APP-213] set out the maximum and where necessary minimum parameters for infrastructure within the spatial extents shown on the Works Plan [AS-002 and AS-003]. The 6ha therefore represents the maximum parameter to accommodate design flexibility for the substation infrastructure, associated ancillary elements, sustainable drainage and landscape mitigation at this stage, prior to detailed design. The outline surface water drainage strategy for the National Grid Substation is set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk

ID	Theme	Representation	Applicant's Response
		from surface water. 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.	Assessment and Outline Surface Water Drainage Strategy [AS-018], with detailed surface water drainage design secured through DCO Requirement 11. Outline surface water arrangements for access track drainage is also set out in this document and secured by the Design Principles, Parameters and Commitments [APP-213]. Detailed surface water drainage design for the access tracks is secured through DCO Requirement 11.
NCC-094	The Scheme Water Environment	26. In relation to section 4.3.14, the LLFA confirm that ordinary watercourse consents are likely to be required for the use of open cut watercourse crossing and may also be needed for the trenchless installation of the cables. Further work and information is required.	Article 6(1)(a) of the draft DCO [AS-032] disappplies section 23 (prohibition of obstructions, etc. in watercourses) of the Land Drainage Act 1991 which ordinarily requires watercourse consents. The Applicant appreciates that this is a prescribed consent under the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 for the purposes of section 150 Planning Act 2008 and therefore the consent of the LLFA is required to disapply section 23. However, the Applicant has included protective provisions for the benefit of drainage authorities at Part 3 of Schedule 14 of the draft DCO [AS-032] to give comfort to the LLFA to agree to the disapplication. This consent of the LLFA to

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			disapplication will be sought to be agreed as part of the SoCG process.
NCC-095	The Scheme Works Plan Water Environment	27. The LLFA notes that no information or description was provided in relation to Works No. 7, 8, 9 and 11. This is further to the previous lack of information in section 4.2.12 to 4.2.16 on these works items. However, from section 4.3.27 to section 4.3.40 some discussion occurred mostly relating to fencing, security, lighting, site access and access tracks. The drainage merely referenced Chapter 9. This indicates the applicant has not included surface water management within the further Scheme Description and indicates their potentially reduced level of commitment to surface water management despite a single listing of "sustainable drainage systems SuDS" in Works No. 7. This, combined with the lack of mentioning of surface water management and its lack of inclusion within significant features to support the other works, makes it not possible to determine what is included within the proposed works or where it would be located. Therefore, no information and very little commitment has been provided in the scheme description. Further information is required.	The Applicant refers to the response under row NCC-093 regarding the Rochdale Envelope. In respect of the specific Works Nos. identified by the LLFA, the Design Principles, Parameters and Commitments [APP-213] and Schedule 1 of the draft DCO [AS-032] confirm that Work No. 7 includes sustainable drainage system ponds, runoff outfalls, general drainage and irrigation infrastructure and improvements or extensions to existing drainage and irrigation systems, boundary treatment, security measures, landscaping and biodiversity, internal access tracks, earthworks, laydown, and operational and maintenance buildings. Commitments for Work No.7 are described in the Design Principles, Parameters and Commitments [APP-213]. Work No. 8, relates to the temporary construction and decommissioning compounds, as described in the Design Principles, Parameters and Commitments [APP-213] and Schedule 1 of the draft DCO [AS-032], which includes for the provision of drainage and waste management infrastructure. Work No. 9, relates to facilitating works to the Scheme and includes offsite works

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			adjacent to highways land including those to structures, boundary features, drainage features on private land, in connection with the movement of abnormal indivisible loads. Work No. 11 relates to the creation of permissive paths and provision of community accessible space with pedestrian access. Design commitments and mitigation measures for flood risk and drainage are set out in the Design Principles, Parameters and Commitments [APP-213], the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the draft DCO [AS-032]. A Preliminary Surface Water Drainage Maintenance Schedule is also provided at Appendix A of the Outline OEMP [APP-197]. Surface water management is described in ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] which demonstrates the management of surface water drainage for the National Grid Substation, Project Substations and BESS. Requirement 11 of the draft DCO [AS-032] requires a detailed surface water drainage

ID	Theme	Representation	Applicant's Response
			scheme will be submitted to and approved by the relevant planning authority. The Applicant continues to engage with the LLFA to provide additional clarification sought, having regard to the outline nature of the drainage strategy for the Scheme.
NCC-096	The Scheme Transport and Access Water Environment	28. The site access and access tracks are discussed in sections 4.3.33 to 4.3.39. The LLFA notes the onsite access tracks will comprise of using existing agricultural tracks and new access tracks. The LLFA will consider the new 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 does not form a porous surface and depending on the age and	The Applicant notes this comment in relation to the build-up/considered impermeability of access tracks. As set out in the Design Principles, Parameters and Commitments [APP-213], the internal access tracks within the BESS and National Grid Substation will be impermeable. All other access tracks (including the internal access track for the National Grid Substation that will remain in place post-decommissioning of the wider Scheme) are designed to be permeable, however there is a commitment to providing swales or filter drains parallel or downhill of the tracks depending on topography. The locations of the access tracks have not yet been finalised and therefore it is not possible at this stage to identify outfall points to watercourses from each track. Detailed surface water drainage design for the access tracks is secured through Requirement 11 of the draft DCO [AS-032].

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		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, however, it is not completely permeable when compacted. Therefore, discharging at a greenfield runoff rate directly into the access track is unlikely to be achieved. 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 for each track and impermeable area. 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 development and impermeable areas that require surface water management. Further information is required.	
NCC-097	The Scheme	29. In section 4.4 there is a relatively detailed discussion on the construction approach for the site preparation and enabling / civil	Construction compounds within the Sites are Work No.8; within the 400kV CRC, Work No. 6A(vi); and within the 132kV CRC No. 6B(vi) as set out

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	Transport and Access	engineering works for the sites that identifies the need to establish construction laydown areas, construct internal access roads and construction of temporary construction compounds. The applicant identifies the approximate location of the construction areas in Figure 4.2. However, due to the scale of Figure 4.2, which covers the whole scheme area, there is a lack of detail regarding the size and layout of the 10 temporary construction compounds. Further limited description is provided in section 4.4.36 to 4.4.39 although the focus in this text appears to be on waste water. Therefore, it is not clear from the information provided whether these areas with an increase in impermeable areas will be supported by surface water infrastructure and attenuation to prevent an increase in flood risk from surface water runoff. Further information is required.	(maximum area) in Design Principles, Parameters and Commitments [APP-213] . The spatial extents of the construction compounds are shown on the Works Plan [AS-002 and AS-003] . Table 3.4 of the Outline CEMP [APP-196] states that <i>'A detailed surface water drainage strategy will be prepared prior to construction of the Scheme, with drainage requirements associated with the construction phase included in the detailed CEMP. Temporary drainage systems will be developed to prevent runoff contaminated with fine particulates from entering surface water drains without treatment.'</i>
NCC-098	The Scheme Transport and Access	30. The LLFA notes that in section 4.4.13, the applicant identifies the need to build a haul road for the cable route corridors. However, there is currently no commitment in the scheme description for the inclusion of surface water management and attenuation features. Further information is required.	Design Principles, Parameters and Commitments [APP-213] provides a commitment, in respect of Work No.7, <i>'Internal Access Tracks'</i> at Table 4.7: <i>'Constructed of hardcore or gravel over a levelling layer of substrate. Whilst this is designed to be permeable, further drainage features such as swales and filter drains will also</i>

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	Water Environment		<i>be incorporated parallel to or downhill of the tracks depending on topography. Depending on the slope, swales will include check dams to prevent the rapid transfer of water downslope. Where access tracks are located in areas of Flood Zones 2 or 3 and/or significant 'low' to 'high surface water flow routes/flood risk areas, access tracks to be kept at existing ground level so as to not impeded floodplain storage or flood flow routes.'</i> Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] discusses the assessment assumptions for Access Tracks and Haul Routes and states the following: <i>'The temporary internal haul routes will be constructed of hardcore or gravel over a 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.'</i> Following discussions with the LLFA on the 18 August 2026, calculations will be provided on the sizing of a swale or filter drain feature for access tracks to demonstrate that a 'Plan B' of discharge to watercourse is feasible for the Scheme, and submitted in the Examination at Deadline 1.

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NCC-099	Outline Construction Environmental Management Plan Water Environment	31. In section 4.4.40, the applicant appears to suggest the “run off and drainage” would be included in the Construction Environmental Management Plan (CEMP). However, this only relates to the construction phase. In section 4.5.21, the applicant briefly indicates that an operational drainage design would be prepared “with the objective of ensuring that drainage of the land to the present level is maintained. It would follow either the design of a new drainage system taking into account the proposed new infrastructure, such as access tracks, cable trench and structure foundations, to be constructed.” Clarification is required as it is not clear if this just relates to the land drainage rather than development drainage. In both the construction and operation phases of the proposed scheme, there is a lack of information, and it is unclear whether there is commitment regarding the management of surface water runoff in the scheme description. Further information is required.	The Applicant acknowledges the LLFA's query and confirms that the reference to run-off and drainage in the Outline CEMP [APP-196] relates to the construction phase, whilst the operational drainage design covers both land drainage and development drainage. The Outline OEMP [APP-197] confirms that the detailed operational drainage design would be carried out pre-construction with the objective of ensuring that drainage of the land to the present level is maintained, and would follow either the design of a new drainage system taking into account the proposed new infrastructure (access tracks, cable trenches and structure foundations) to be constructed or, if during the construction of any of the infrastructure there is any interruption to existing schemes of land drainage, new sections of drainage would be constructed. Surface water attenuation will be provided for the BESS, National Grid and Project Substations, access tracks and standalone converter/inverter units. The outline surface water drainage arrangements for these elements of the Scheme are outlined in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. Detailed surface water drainage design is secured through Requirement 11 of the draft DCO [AS-032].

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NCC-100	The Scheme Replacement of Infrastructure / Components	32. In sections 4.5.29 to 4.5.33, the LLFA notes the replacement activities are discussed. The applicant states that "It is assumed that the operational life of Solar PV Panels is 40 years and that all Solar PV Panels will be replaced once during the operational phase and this will take a maximum period of 24 months" 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 4.5.30, the applicant states "it is not expected than an extensive replacement of all components will be required across the entirety of the Scheme during one period" and that "the replacement activity would be considerably less intensive than during construction." While in section 4.5.32, confirms that "Transformers are assumed to have a design life of 30 years and as such may require replacement once during the lifetime of the Scheme". The LLFA notes that the initial construction phase requires considerable areas of temporary construction compounds and hardstanding to support the construction of the PV arrays and the BESS. However, in the ES, it is not clear whether similar temporary construction facilities and	ES Volume 1, Chapter 4: The Scheme [APP-040], sets out the proposed 'replacement' activities associated with the operational phase of the development, and how this is addressed in the following ES topic chapters. Paragraph 2.12.2 of the Outline OEMP [APP-197] states, <i>'During the anticipated 60-year operational life of the Scheme, it is expected that there will be a requirement for the periodic replacement of some of the electrical infrastructure. It is not expected that an extensive replacement of all components will be required across the entirety of the Scheme during one period. The programme for replacement of equipment across the Scheme is anticipated to be staged to maintain the electrical export to the National Grid Substation'</i>. A detailed OEMP will be submitted to be approved by the relevant planning authority under Requirement 14 of the draft DCO [AS-032]. During the replacement period, the components will be delivered and replaced on a phased basis to minimise the amount of energy generation loss experienced by the Scheme.

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		supporting infrastructure would be expected for the regular interim replacement activities and where they would be located. Further information is required.	
NCC-101	The Scheme Decommissioning Water Environment	33. The LLFA notes that in sections 4.6.1 to 4.6.8, the applicant has confirmed the decommissioning process would involve the removal of all Solar PV Panels and all related infrastructure, ancillary infrastructure, substations and BESS will be removed. However, it is not clear if the underground cables, site access points or sealing end compounds would be removed but it is clear the national grid substation, pylons, overhead lines would remain. While the foundations and other below ground infrastructure will be cut to 1.2m below the surface and removed, the cable ducting and jointing bays are proposed to remain in place at present. It is indicated that National Grid Substation would be handed over to the Distribution Network Operator and not returned to the landowner. Therefore, a number of the elements that are not being removed, they are shown to have a longer design life than the proposed development currently indicates and are to be considered as permanent development. The proposed development design life has	The National Grid Substation (which National Grid will operate and decommissioning at their discretion) may be able to provide future connection capacity to the National Electricity Transmission System once the Scheme is decommissioned, however this would be for National Grid to determine, at a future point in time, subject to the operational condition of the substation at the end of the operational phase of the Scheme, and the need for there to be a point of connection maintained beyond this date for network planning reasons. To require the removal of a point of connection before it has reached the end of its operational life, or before, while it is required to still be operational, is not efficient in terms of delivering public benefits though taking a long-term approach to network infrastructure planning. Hence the Applicant has not included the removal of this infrastructure as part of decommissioning the Scheme. The approach to decommissioning is set out in the Outline DEMP [APP-198], which confirms that at

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		been previously stated as "60 years". However, it is not clear why the national grid substation and grid connection infrastructure would remain as it is only intended to serve this project should also be removed as part of the decommissioning process. Should it be required for another user, then further information would be appropriate to demonstrate the additional users of that infrastructure as part of this DCO and the need to retain the infrastructure. The LLFA will require all elements and aspects of the proposed development identified as not being removed as part of the decommissioning process should be considered as permanent features and design appropriately with suitable surface water management. Many of these features are likely to have an impact on the surface water runoff due to the associated impermeable areas and an improved surface water management design would be required. The LLFA requires that all structures that are likely to remain are better identified at this early stage and their permanent need and use confirmed along with an appropriate permanent design being prepared. Should the applicant not be able to identify these additional permanent structures	the end of the operational life, apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned and the land returned to the landowner. The Applicant confirms that foundations and other below-ground infrastructure will be cut to 1.2m below the surface to enable future ploughing. Further, the Outline DEMP [APP-198] states that in relation to the decommissioning of cabling 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 cables. The detailed DEMP is secured through Requirement 21 of the draft DCO [AS-032], and the detailed surface water drainage scheme through Requirement 11. The assessment of surface water attenuation within Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface

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		at this time, such as culverts, access tracks and others, the LLFA recommends the application of a precautionary approach to all structures that this situation could apply to. This would involve preparing permanent designs at this stage that could be reduced to temporary design in a later stage of the design development to ensure there is no increase in flood risk onsite or elsewhere in the future. Further work and information is required.	Water Drainage Strategy [AS-018] takes a conservative approach in that the Upper End +45% allowance for peak rainfall intensity has been used for the infrastructure falling under the 60-year lifetime (BESS, Project Substations and access); and the National Grid Substation and access track which will remain beyond this lifetime. This is secured within the Design Principles, Parameters and Commitments [APP-213] .
NCC-102	The Scheme Design of the Scheme Water Environment	34. The LLFA notes that as yet, we have not seen any information relating to the water management from the fire suppression systems associated with the various transformers required across 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. Further information is required.	Paragraph 9.11.3 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] states ' <i>The BESS, National Grid Substation, and Project Substations will require additional mitigation due to the risk of fire from batteries/transformers and mobilisation of contaminants in firewater which would impact watercourses, groundwater bodies/aquifers and private water supplies.</i> ' Paragraph 9.11.6 goes on to state, ' <i>All smaller fixed infrastructure (e.g. transformers) will be self-bunded to prevent any leaks from reaching the watercourse. If pollution is detected it will be suctioned to a self-bunded (or similar) tank and removed from site for suitable disposal.</i> '

ID	Theme	Representation	Applicant's Response
			Requirement 11 of the draft DCO [AS-032] requires a surface water drainage scheme to be approved by the relevant planning authority in consultation with the EA, NCC as lead local flood authority, and Anglian Water Services Limited.
NCC-103	The Scheme Transport and Access Water Environment	35. In relation to the proposed site access (sections 4.3.33 to 4.3.39), 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, discussion or mention of the possible need for new accesses or improvements 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 routes either needing to be revised or surface water management improvements to the local highway network being required. Further work and information is required.	The outline surface water drainage arrangements for these elements of the Scheme are outlined in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] (which also confirms that the Scheme will not increase flood risk elsewhere). Detailed surface water drainage design is secured through DCO Requirement 11. The Scheme will aim to utilise existing access points onto fields as far as possible. Where the detailed design identifies new access points or improvements to existing access points are required, improvements to existing access, appropriate surface water management measures will be implemented to ensure that there is no increase in surface water flood risk.
NCC-104	The Scheme Water Environment	36. It is noted in Figure 4.1 that supports Chapter 4 of the ES, there are a number of areas that are noted as retained agricultural land. It is not clear whether the applicant	Areas of 'retained agricultural land' are shown on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] and the Green Infrastructure Strategy [AS-005] . The areas of retained agricultural land

ID	Theme	Representation	Applicant's Response
		intends to keep these areas for agricultural use throughout the lifetime of the scheme or whether further development that could increase the runoff is likely to be proposed. Further information is required.	would be within areas demarcated by Work No.10 (works to create and maintain habitat management areas) shown on the Works Plan [AS-002 and AS-003]. The retained agricultural land will be managed in accordance with the Outline LEMP [APP-199]. Solar PV Panels are not proposed within the retained agricultural land. Any material change to the authorised development would require further consent in accordance with the Planning Act 2008. The draft DCO [AS-032] does not provide an unrestricted ability to redesign or rebuild the Scheme without further permission and the Requirements control the detailed design, including any surface water drainage scheme.
NCC-105	Water Environment The Scheme	ES Chapter 9 – Water Environment 37. In section 9.1.3, the LLFA notes the applicant states that “the information presented within this chapter has been informed by the Scheme information provided in ES Chapter 4: The Scheme [EN0110014/APP/6.1.4].” However, as previously identified in the LLFA’s comments, the information available in the Scheme Description is very limited at present in relation to the management of surface water runoff. Further information is required.	The Applicant refers to its responses to NCC-104.

ID	Theme	Representation	Applicant's Response
NCC-106	Water Environment (Flood Risk)	38. The LLFA notes the new responses to the LLFA's comments at the LLFA meeting on 10th December 2025 in relation to the location of the Solar PV Arrays in areas of surface water flood risk. The applicant quoted a selected section of paragraph 027 from the NPPG which identified the need for the flood risk to be identified by the Environment Agency flood risk mapping. The LLFA notes the Risk of flooding from surface water is a map that is produced by the Environment Agency and therefore should be included in the application of the sequential test. The LLFA also notes there is an inconsistency between the definition of the fluvial and coastal flood zones and the surface water AEP extents. For example, flood zone 3 (which includes flood zone 3a and 3b) is land considered to be at high fluvial flood risk with a 1% AEP event, however for the equivalent surface water flood risk for the 1% AEP event the surface water flood risk is considered to be a medium risk. The same inconsistency for flood zone 2 occurs where the land is considered to be at medium fluvial flood risk with between 1% to 0.1% AEP event, however for the equivalent surface water	The Applicant notes the inconsistency between the EA Flood Zone and Risk of Flooding from Surface Water definitions. To meet operational requirements, limited areas of Solar PV Panels are located within areas of 'low-high' surface water flood risk, however they are raised on narrow supports and sensitive electrical components of the panels are set at the top of the support which has significant freeboard above ground level. The Design Principles, Parameters and Commitments [APP-213] states that <i>"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."</i> Consideration of the policy requirements of NPS EN-1, the NPPF, and the relevant NPPG is set out within Appendix A of the Planning Statement [APP-209]. A sequential approach has been adopted for the design and layout of the Scheme to minimise flood risk by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable.

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		flood risk for between 1% to 0.1% AEP event the surface water flood risk is considered to be a low risk. Therefore, if surface water is to be equally assessed as a constraint to flood risk from rivers and the sea, then medium and low surface water flood risk areas will also need to be included in the constraints assessment in order to match the equivalent flood zones extents given in NPPF. NPPF and EN1 are clear that all sources of flood risk should be considered in both the FRA and the sequential test. In addition, EN1 is clear in paragraph 5.8.7 that "Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall." As there is no preference to any one source of flood risk, all sources of flood risk are to be considered equally during assessments. The LLFA notes that NPPG paragraph 028 confirms the definition of 'reasonably available' in relation to the assessment of	The Applicant has applied the Sequential and Exception Tests to both site selection and for the design and layout of the Scheme to ensure that the most vulnerable uses are sited in areas of lower flood risk as far as possible. For the Exception Test, substantial wider sustainability benefits of the Scheme are summarised in the Planning Statement [APP-209], together with the proposed measures that have been incorporated into the Scheme design to ensure that the Scheme is safe from flooding for its lifetime and will not increase the risk of flooding elsewhere.

ID	Theme	Representation	Applicant's Response
		flood risk and states that "alternative sites do not need to be owned by the applicant to be considered 'reasonably available'." Further work is required.	
NCC-107	Water Environment (Flood Risk)	39. The LLFA notes that in section 9.4.1 in bullet point 2, the applicant has indicated that some Order Limit areas that are detached from the main area have not been considered in relation to flood risk due to the nature of the works. While the LLFA agrees there is limited potential for flood risk increase in tree removal and hedge trimming, it is not clear to the LLFA the nature of the "verge improvements" activities. Alterations to verges can alter the existing flood risk both in a detrimental and beneficial way. However, at present it is not possible for the LLFA to consider the proposals as not enough information on the verge improvement works and the location has been provided. Further information is required.	As set out in ES Volume 1, Chapter 4 – The Scheme [APP-040] , the highway works will contain localised improvements, such as improvements to deteriorated road edges or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries to construct the Scheme and will support the movement of construction vehicles on narrower sections of the local highway networks within parts of the construction vehicle routes to the Order Limits. Where surface water management measures are required for verge improvement or other works within the detached areas of the Order Limits, this will be considered within the detailed design which is secured through Requirement 11 of the draft DCO [AS-032] .
NCC-108	Commitments Register	40. The LLFA notes that in section 9.4.1 the applicant indicates that maintenance appears to occur only in the operation phase. The LLFA reminds the applicant that maintenance of the temporary facilities in the construction and decommissioning phases is also	Measures relating to the maintenance during construction and decommissioning phases are addressed within the Outline CEMP [APP-196] and Outline DEMP [APP-198] , secured through Requirements 13 and 21 of the draft DCO [AS-032] .

ID	Theme	Representation	Applicant's Response
	Temporary Construction Compounds	required. However, this consideration is also not apparent in the information provided in the ES and the various supporting documentations. Further commitments or alteration to existing commitments may be required for maintenance in the construction and decommissioning phases.	
NCC-109	Water Environment (Flood Risk)	41. The LLFA notes in section 9.4.1, bullet point 4 the applicant states "analysis of flood extents based on National FRA (NaFRA2) mapping update where detailed Environment Agency hydraulic modelling is not available for smaller tributaries of the Hempnall Beck." The LLFA notes that the Environment Agency Flood Map for Rivers and Sea is a strategic model. The Environment Agency have also prepared a Flood Map for the risk of surface water flooding. While the Environment Agency have reduced the potential for double counting of flood water from the watercourses in the surface water flood map, the method used for modelling surface water flooding highlights flowpaths in relation to topographical geometry, which results in the surface water flood map identifying the potential 3.3% (equivalent of flood zone 3b), 1% (equivalent of flood zone	The Applicant is aware that areas of surface water flood risk has been clipped to avoid double counting with fluvial flood risk. It is acknowledged that surface water flow routes exist across the Order Limits, however the layout of the Scheme has been developed to provide a 10m buffer from the edge of watercourses and to located infrastructure within areas of flood risk as far as reasonably practicable as set out in Section 8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Surface Water Drainage Strategy [AS-018] and secured within the Design Principles, Parameters and Commitments [APP-213]. Limited areas of solar panels are located within areas of 'Low-High' surface water flood risk, however, they will be raised up on narrow supports at an appropriate freeboard above anticipated flood depths as secured within the Design Principles, Parameters and Commitments [APP-213].

ID	Theme	Representation	Applicant's Response
		3a) and 0.1% (equivalent of flood zone 2) flood extents. As ordinary watercourses tend to follow low topographical areas. Therefore, the surface water flood map extents can align with ordinary watercourses that have not been included in the fluvial hydraulic model. Therefore, some surface water hydraulic modelling is available for the smaller tributaries that would indicate an approximate flood extent that could be associated with the watercourses for strategic use. In the FRA, the applicant notes that in Appendix B of the FRA that the Environment Agency confirm that surface water flood mapping has been used to model ordinary watercourses. The LLFA would suggest the applicant has not given due consideration to this available information during the preparation of the Environmental Statement and the majority of the site areas in FRA at this time, as the FRA only indicates that this consideration has been given to Site 8A. Further work and information is required.	
NCC-110	Water Environment (Flood Risk)	42. The LLFA notes that in Table 9.4 the identified receptors focus on environmental receptors and does not consider the	The scope for ES Volume 1, Chapter 9 – Water Environment [APP-045] as agreed at the EIA scoping stage did not include properties as a

ID	Theme	Representation	Applicant's Response
		properties within the communities. A key issue in this chapter is about considering whether there is an increase in flood risk on site and elsewhere. Properties in the communities adjacent to the proposed development could potentially be in any of the flood risk areas identified in Table 9.3. Therefore, the justification for excluding properties from Table 9.4 is not clear to the LLFA. Furthermore, in Table 9.5 there is also no consideration of properties in terms of change in flood risk. Further clarification is required.	receptor and this was not raised by the LLFA in response to the PEIR Chapter 9. Whilst it is noted that properties within communities surrounding the Order Limits have not been included within ES Volume 1, Chapter 9 – Water Environment [APP-045], any potential impacts to these receptors would be mitigated through the embedded mitigation measures as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. As such, potential impacts to off-site properties and their residents would be 'Not Significant'. In addition, ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018 and 019] confirms that the Scheme will not increase flood risk elsewhere.
NCC-111	Water Environment (Watercourses)	43. The LLFA notes that in section 9.6.2 the applicant lists the "principal watercourses" as the Hempnall Beck, River Tas, Broome Beck and Little Beck. However, in Waterbodies River Basin Management Plan (APP/2.8) shows the watercourse catchment areas the Starston Brook is shown to be a principal watercourse in the Great Moulton area which is not included in section 9.6.2 but is included	Whilst specific reference to the Starston Brook may have been omitted from ES Volume 1, Chapter 9 – Water Environment [APP-045] paragraph 9.6.2, the receptor is identified within Table 9.4 and the chapter assesses impacts in relation to this receptor, which concludes that the residual effects are 'Not Significant' with the exception of the cessation of agricultural/fertiliser use where the

ID	Theme	Representation	Applicant's Response
		in 9.6.5 that Starston Brook Water Body. Therefore, it is noted to be a notable waterbody and should be considered as a principal watercourse within the ES. Further consideration and work required.	impact has been assessed as Significant Major Beneficial.
NCC-112	Water Environment (Flood Risk)	44. The LLFA notes the baseline for Flood risk is not summarised in Chapter 9 but refers to the Flood Risk Assessment in Appendix 9.1 with no further baseline information provided within the chapter that undertakes the assessment. This is inconsistency with the LLFA's previous experiences where a summary of the baseline of flood risk is provided that is suitable for the assessment in the ES be based upon. Further work and consideration is required.	The Applicant notes this comment. Given the large area that the Order Limits covers, and the variable flood risk (notably surface water and groundwater) across the Order Limits it is considered that a cross reference to ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018 and 019] where the detail is contained is a proportionate approach, in line with EIA best practice.
NCC-113	Water Environment (Flood Risk) Outline Construction Environmental Management Plan	45. A similar approach was taken to the description of the embedded mitigation for the management of cable works in areas of flood risk where reference to the Outline CEMP was made with no description or summary of the embedded mitigation being provided. The LLFA reviewed the Avoidance Areas in the OCEMP and noted that on occasions the information given was incomplete. For example, CRC3A lists "Hedgerows, Carpenter's Walk, ProW" but there is no mention of the watercourse that is	The Applicant notes this comment. Given the large size of and variable flood risk across the Order Limits it was considered that a summary would be lengthy and run the risk of inconsistencies between Chapter and accompanying appendix, and therefore there is instead a cross reference. All the necessary information is available for review either within the ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] or ES Volume 1, Chapter 9 – Water Environment [APP-045] .

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		beside the hedgerow. The LLFA notes that other instances of what appears to be incomplete information occurs in this Table 2.1. Further work and consideration is required.	
NCC-114	Water Environment (Flood Zones) Temporary Construction Compounds	46. In section 9.7.3, the applicant identifies that "no temporary construction compounds and stockpiles are located within Flood Zone 2 and 3." However, it is not clear whether construction compounds would be within the equivalent surface water flood extents. Further information required.	A review of the temporary construction compounds, as shown on the Works Plan [AS-002 and AS-003] has been undertaken against the Risk of Flooding from Surface Water extents. The works areas for these compounds are located within Very Low surface water flood risk areas, with some localised areas of low-medium risk present within the compounds for Sub-Sites 10C, 2B and 1B which correspond to localised topographic depressions.
NCC-115	Water Environment (Watercourses) Transport and Access	47. Furthermore, in section 9.7.3, the applicant identifies the "use of temporary access ramps for internal haul route vehicular crossing points over watercourses." The LLFA is not clear what is meant by the term "ramp" in relation to a crossing point and seeks clarification from the applicant. The watercourse crossing approach and the reinstatement of the land and watercourse following the removal of the haul road is stated as being in the Outline CTMP rather than the CEMP. The LLFA queries whether	There will be vehicles transporting equipment along the CRC for the cable installation and for the launch and reception pits within the CRC. The Outline Cable Route Construction Statement [APP-216] sets out a hierarchy for different forms of crossing watercourses, which are listed in order of least to most impact and are likely to be appropriate, respectively, for the most to least sensitive features. To clarify, the term 'ramp' has been used to describe a temporary vehicular crossing structure spanning the watercourse; ranging from no in-

ID	Theme	Representation	Applicant's Response
		the applicant is providing clear information in the appropriate documents. The LLFA has reviewed the Outline CTMP and was unable to find the information stated as available by the applicant in the Outline CTMP. Further information and clarification is required.	channel interference (over-bank structure), a structure within channel support or culverted crossing. The Outline CEMP [APP-196] secures the cable route construction crossing access (and Avoidance Areas) and further mitigation measures relating to construction traffic are secured in the Outline CTMP [APP-197]. A detailed CEMP and detailed CTMP will be prepared substantially in accordance with the Outline CEMP [APP-196] and Outline CTMP [APP-201]. These must be submitted to and approved by the relevant planning authority prior to the commencement of construction. These requirements are secured through Requirements 13 and 15, respectively, of the draft DCO [AS-032].
NCC-116	Water Environment (Drainage) Transport and Access Outline Construction Traffic	48. In relation to the CTMP it was noted by the LLFA that the applicant has confirmed that the haul roads would be formed of type 1 material in section 3.2.5. As previously stated, 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	Whilst most access tracks (with exception of those within BESS and Substation compounds) have been stated to be permeable within Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], surface water management measures in the form of swales or filter drains are proposed as secured within the Design Principles, Parameters and Commitments [APP-213].

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	Management Plan	compacted into the surface. For example, Type 1 material does not form a porous surface and depending on the age and compaction then the surface could be as smooth and impermeable as concrete. Therefore, discharging at a greenfield runoff rate directly into the access track is unlikely to be achieved. With this in mind, the LLFA would require more information from the applicant to demonstrate there is adequate space for a surface water drainage system for the access road and that a viable discharge location is identified for each haul road impermeable area. 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, EN1 and the LLFA's Developer Guidance. In addition, any improvements or widening of the existing access tracks will also be considered as new development and impermeable areas that require surface water management. Further information is required.	The Applicant notes the request from the LLFA to provide comfort that there is sufficient space adjacent to the access tracks for their drainage features and further information will be provided at a later deadline to confirm typical sizing and outfall location(s). It is intended to model the swale or filter drain features for one Sub-Site, which can then be replicated across the Scheme at detailed design, and to provide conceptual drawings showing the route/direction of the drainage features and indicative outfalls to adjacent watercourses.
NCC-117	Water Environment (Drainage)	49. In the second bullet point in the surface water runoff and pollution management subsection of section 9.7.8, the applicant has	The Applicant refers to its response to NCC-116.

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		again indicated the access tracks are permeable. As previously discussed, the use of type 1 or similar material to form an access track is not considered to be a permeable surface. While the LLFA notes that in the same section that "additional passive drainage features such as shallow ditches and filter drains that are located downstream of or run parallel with the tracks." These features would need to be sized appropriately and with a confirmed discharge location to ensure there is no increase in flood risk. At present the not enough information or evidence available to demonstrate that a viable surface water drainage system is included in the proposed development. Furthermore, the proposed drainage system has not been included in the scheme description for the relevant features and their locations. Therefore, this is inconsistent with the previously provided information. It should be noted that as per the information given in bullet point four in the surface water runoff and pollution management subsection of section 9.7.8, infiltration testing will be required in each location to determine the suitability of discharging to ground. Further information and clarification is required.	

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NCC-118	The Scheme Water Environment (Drainage)	50. The LLFA notes that in section 9.7.8, the applicant confirms the proposed development would limit the use of concrete footings to “areas of where there is a requirement to protect any underground assets/resources e.g. if archaeological protection is required”. This is a slightly wider statement than was previously indicated in Table 4.1 of Chapter 4 where it specifically states that “in areas of archaeological protection concrete feet or other non-ground penetrative techniques will be used”. The LLFA requires clarification to confirm that in areas of archaeological protection concrete feet or other non-ground penetrative techniques will be only be used for the protection of archaeological assets. This is to ensure there is no increase impermeable areas that could lead to an increase in local flood risk. Further clarification is required.	The Applicant refers to its response to NCC-085.
NCC-119	Water Environment (Surface Water Runoff)	51. In relation to section 9.7.8 bullet point 3, it is not clear to the LLFA whether the surface water freeboard allowance would also be included to ensure the avoidance of surface water flooding. Section 18.1.3 of the LLFA Developer Guidance is clear that “The LLFA would expect that there would be a minimum of at least 150mm freeboard between	Section 8.1 paragraphs 8.1.6-8.1.8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] provides information in relation to freeboards of the solar panels and inverter/converter units in relation to surface water flood risk. The Applicant clarified in a meeting with the LLFA on 06 July 2026 that the sensitive electrical

ID	Theme	Representation	Applicant's Response
		proposed external ground levels and property FFL." At present, it is not clear if this requirement is accounted for in the proposed parameters for the proposed development. Furthermore, in the third bullet point in the surface water runoff and pollution management subsection of section 9.7.8 is also inconsistent on the application of the 150mm freeboard between the ground level and the finished floor level / finish infrastructure level. The applicant is reminded that in EN1 paragraph 5.8.2 states "Having resilient energy infrastructure not only reduces the risk of flood damages to the infrastructure, it also reduces the disruptive impacts of flooding on those homes and businesses that rely on that infrastructure." With this in mind, it is reasonable to expect the freeboard allowances to be applied to the proposed development. Further information is required.	equipment associated with the solar panels is set at the top of the narrow support that the panel sits on and would therefore have significant freeboard above ground level and anticipated surface water flood depths. The referenced LLFA developer guidance recommendation for 150mm is understood to be focussed primarily on new buildings for habitation, which has a different degree of flood risk to the works over the proposed solar scheme. The requirements for freeboard above surrounding ground have been taken into consideration for the site infrastructure elements (i.e. standalone inverter / converter units / switchgear) and is typically based on a minimum 100mm freeboard above proposed surrounding ground levels, with flood resilient elements of the construction included where necessary at lower level. This will be confirmed at detailed stage.
NCC-120	Water Environment (Surface Water Runoff)	52. The LLFA notes that in bullet point 6 of 9.7.8, the applicant has only indicated that "O&M building would be located outside of Flood Zones 2 and 3." However, there is no mention of whether similar consideration of surface water flood areas will be applied. This is inconsistent with the approach	Operational and maintenance buildings would be treated the same as standalone converter/inverter units. The Design Principles, Parameters and Commitments [APP-213] outlines the following commitment:

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		provided in the previous 2 bullet points in section 9.7.8. Further information and clarification is required.	<i>"Conversion Units will be located in Flood Zone 1 and away from areas of surface water flooding, as far as practicable."</i>
NCC-121	Water Environment (Surface Water Runoff) The Scheme Scheme Design	53. In the sixth bullet point in the surface water runoff and pollution management subsection of section 9.7.8, the applicant is not clear what is assumed to be a permeable surface. At present the text appears to indicate that the lined SuDS system is permeable which is a contradictory statement. Alternatively, it could indicate that the surface of the BESS is permeable, which is also contradictory. As previously described, the use of compacted type 1 material on access tracks and development platforms would not be considered permeable. Typically a development area such as for a BESS or a substation involves the preparation of the ground underneath that typically results in the compaction of the ground with the placement of a subbase or relevant foundations and a top layer around the structures that will need to be suitable as a running surface for vehicles and operatives as supported in the information provided in Chapter 4 and other information in various other documents that indicate the use of type 1 material. Therefore, the LLFA will consider	The Applicant provides further clarification to this 6 th bullet of paragraph 9.7.8 (surface water runoff and pollution management) of ES Volume 1, Chapter 9 – Water Environment [APP-045] below. The surface around the battery units within the BESS and across the Substations is permeable, whereas the aggregate attenuation sub-base beneath is lined to ensure no interaction between the surface water attenuation and geological strata/aquifers beneath. Roads within the BESS and Substation compounds would be impermeable as stated within Table 4.2 of the Design Principles, Parameters and Commitments [APP-213] .

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		these areas to be impermeable, and a suitable surface water management arrangement will be required to ensure there is no increase in flood risk. A similar set of clarifications would be appropriate for bullet point 7. Further work and information is required.	
NCC-122	Water Environment (Surface Water Runoff and Flood Risk) Temporary Construction Compounds The Scheme	54. In section 9.7.9, the LLFA notes the applicant's commitment for "No temporary construction compounds and stockpiles would be located within Flood Zones 2 and 3." However, there is no mention or consideration of the avoidance of the equivalent surface water flood extents. Therefore, the consideration of flood risk is inconsistent as only flood risk identified from some of the Environment Agency's modelled areas has been managed. Further consideration and mitigation should be put in place to manage surface water flood risk too. Further work and information is required.	The Applicant notes this comment. The securing documentation is the Outline CEMP [APP-196] . Further consideration will be given to referencing surface water flood risk within the commitments for compounds and stockpiles in respect of higher surface water flood risk/major flow routes.
NCC-123	Water Environment (Watercourses)	55. The LLFA notes that in section 9.8.27, the applicant indicates that there is the potential for heat transfer from the cables to the watercourses and the associated receptors. The applicant then goes on to dismiss the potential effects, although no evidence has been provided to support this	The Applicant acknowledges that additional evidence may be provided to support the conclusion that thermal effects from buried high-voltage electrical cables are unlikely to result in significant effects on groundwater receptors, including Groundwater Dependent Terrestrial

ID	Theme	Representation	Applicant's Response
		limited consideration. Therefore, it is not possible for the reader to consider whether an appropriate assessment of this issue raised by the applicant has occurred and whether the magnitude and significance has been assessed accordingly in the ES. Further work and consideration is appropriate.	Ecosystems (GWDTEs), peat deposits and other sensitive hydrogeological features. To address this, the Applicant will undertake an additional desk-based risk assessment as discussed and agreed with the Environment Agency. The Applicant notes that thermal effects will only be relevant during the operational phase, as the cables will not be energised during construction and will be de-energised prior to decommissioning. Any mitigation measures identified through the thermal, hydrogeological or ecological assessments will be incorporated into the detailed cable design and secured through the final Outline OEMP. Where relevant, the Outline CEMP will also be updated to reflect any design or construction requirements arising from the assessment process.
NCC-124	Water Environment (Surface Water Runoff) Contamination	56. In section 9.8.36 to 9.8.40, the applicant identifies that "It is anticipated that the storage of chemicals or oils within the compounds during this Phase will be limited however should a spill/leak occur the risk of contamination will be minimised through the use of the embedded mitigation measures secured through the Outline OEMP". On review of the OOEMP, the focus of the management measures is on the prevention	The Applicant notes the LLFA's request for clarification on mitigation measures for groundwater contamination. The assessment of effects from the Scheme on the water environment, including groundwater, is set out in ES Volume 1, Chapter 9 – Water Environment [APP-045]. The Outline OEMP [APP-197] in Table 4.4 states in relation to the National Grid Substation, fuel and other potentially polluting chemicals will either be in self-bunded leak proof containers or stored in a

ID	Theme	Representation	Applicant's Response
	Ground Conditions	of contaminants entering watercourses however, there appears to be a lack of discussion on what measures would be used to prevent the contamination of groundwater or whether these have already been mitigated with the proposed drainage design. Clarification is required.	secure impermeable and bunded area (minimum capacity of 110% of the capacity of the containers); therefore, any pollution from these areas arising from leaks/spills would be contained and would not interact with groundwater bodies. The OEMP will be updated at Deadline 1 to include this commitment in relation to the Project Substations and BESS compounds.
NCC-125	Water Environment (Water Resources) The Scheme	57. In section 9.8.54, the applicant has identified there is a potential for "impacts on groundwater recharge due to increases in impermeable area at the Order Limits, notably for the BESS, Project Substation and National Grid Substation areas (including cabins and transformers)" in the construction and decommissioning phases. It is not clear to the LLFA, from the information provided in this and the subsequent sections, why the impact during the operational phase has not been considered when the structures present would be present. Clarification is requested.	The Applicant confirms that the impacts of groundwater recharge are considered for all phases of the Scheme as set out in Section 9.8 paragraphs 9.8.54-9.8.57 and Table 9.7 of ES Volume 1, Chapter 9 – Water Environment [APP-045] .
NCC-126	Water Environment	58. In relation to the summary of the residual effects in Table 9.7, until the LLFA's concerns and clarifications have been addressed it will not be possible to consider the appropriateness of the assessment	The Applicant notes this comment and has responded to the points raised on ES Volume 1, Chapter 9 – Water Environment [APP-045] in the rows above.

ID	Theme	Representation	Applicant's Response
		results. Further work and information is required.	
NCC-127	Water Environment (Flood Risk Assessment and Drainage Strategy)	Appendix 9.1 – FRA and Drainage 59. The LLFA notes that in section 1.5.1, the Anglian Water records (August 2023) are over two and half years old. It is industry practice for this data to be no older than 12 months as changes to the system occur regularly. Updated information is required.	The Applicant notes this comment. Any updated Anglian Water records would be considered at detailed design stage and as part of discharge of Requirement 5 of the draft DCO [AS-032] .
NCC-128	Water Environment (Flood Risk Assessment and Drainage Strategy)	60. <i>Informative</i> – The LLFA notes the comments provided in section 2.2.3 in relation to EN1 and reminds the applicant that EN1 also states in paragraph 5.8.3 that “Protecting communities around the country from flooding is one of the government’s priorities.” In addition, the LLFA also reminds the applicant that EN1 paragraph 5.8.4 states “All buildings in flood risk areas can improve their preparedness to reduce costs and disruption to key public services when a flood happens. Where infrastructure is not better protected as part of a wider community scale flood defence scheme, those who own and run infrastructure sites – whether in public or private hands – are expected to take action to keep water out, minimise the damage if	The Applicant notes this informative. The built infrastructure within the Scheme has been located outside of Flood Zones 2 and 3, and outside areas of surface water flood risk as far as practicable. The majority of the Scheme would comprise Solar PV Panels which are raised on narrow supports at an appropriate freeboard above the ground and anticipated flood depths. The infrastructure is therefore designed to remain operational during its lifetime and will not increase flood risk at the site or elsewhere as confirmed in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] .

ID	Theme	Representation	Applicant's Response
		water gets in through flood-resilient materials, and reduce the disruption caused."	
NCC-129	Water Environment (Flood Risk Assessment and Drainage Strategy)	61. <i>Informative</i> – The LLFA notes the selective presentation of information in section 2.2.3 of the FRA and Drainage Strategy. For example, in bullet point 5 in the FRA and Drainage Strategy, the reported focus is on the Environment Agency. However, in paragraph 5.8.18 of EN1, it is clear that "other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators." In relation to bullet point four of section 2.2.3 of the FRA, the applicant has indicated that an FRA is only required "for energy projects of 1ha or greater in Flood Zone 1 and all energy projects in Flood Zones 2 and 3". However, on reviewing paragraph 5.8.13 of EN1, it is clear that "an assessment should accompany all proposals involving land that may be subject to other sources of flooding (for example surface water)". 62. Therefore, surface water flood risk again should be considered equally in comparison to other sources of flood risk.	The Applicant notes this informative. The Environment Agency produce the Flood Zone and surface water flood mapping used within the assessment undertaken within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. However, information from NCC has been considered in the form of the Greater Norwich Strategic Flood Risk Assessment and liaison has also been undertaken with the local Internal Drainage Boards and Anglian Water. Therefore, the assessment undertaken is in accordance with NPS EN-1 paragraph 5.8.18. ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] considers flood risk from all sources in accordance with NPS EN-1 paragraph 5.8.13.

ID	Theme	Representation	Applicant's Response
NCC-130	Water Environment	63. In section 2.2.6 the LLFA notes the applicant references Paragraph 2.10.85 in what is thought to be EN-3 and the applicant indicates that this is in reference to the FRA needing to consider the use of SuDS. However, on review of EN-3, paragraph 2.10.85, it states "Generic landscape and visual impacts are covered in Section 5.10 of EN-1." The LLFA seeks clarification of what is being referenced in this text. Further information and clarification is required.	The Applicant acknowledges this is an error in paragraph referencing for NPS EN-3, the correct paragraph reference is 2.10.77.
NCC-131	Water Environment	64. The LLFA notes that in section 3.1.1 the Hempnall Beck is described as becoming "part of the Waveney, Yare and Lothingland IDB district approximately 600metres (m) to the north-east of Sub-Site 4B and south of Sub-Site 7A". This does not appear to be correct as the Hempnall Beck is part of the wider River Tas Catchment as clearly shown in Waterbodies River Basin Management Plan [APP/2.8]. The LLFA notes that part of the Hempnall Beck is within the Norfolk Rivers IDB. While part of the Broome Beck is within the Waveney, Yare and Lothingland IDB. At present the FRA will require correction of these baseline facts. Further work is required.	The Applicant notes this comment, however this error does not affect the assessment undertaken within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] .

ID	Theme	Representation	Applicant's Response
NCC-132	Water Environment	65. The LLFA notes in section 3.2.2, the applicant identifies "the presence of several land drains between fields/along Sub-Site boundaries with typical depths of 0.5-1.0m." The LLFA confirms that as these are connected to the watercourse network these land drains are also ordinary watercourses. Land drains are normally a below ground network that enable the removal of excess water in the soil to drain to ordinary watercourse. The LLFA notes that further correction to the baseline information for the FRA is necessary. Further work is required.	Land drains mentioned in paragraph 3.2.2 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] refer to the ditches between fields.
NCC-133	Water Environment	66. In table 3.1, it is not clear whether the topographic levels provided in the table are from the Lidar dataset or the site specific topographic survey. It is also not clear whether the CRC have been surveyed as no information on this was provided. Further work is required.	The topographic levels within Table 3.1 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] refer to EA LiDAR data presented in ES Volume 2, Figure 9.2 – Topography and Overland Flow Routes . The topographic levels CRCs have not been surveyed in detail, but the topography is presented on ES Volume 2, Figure 9.2 – Topography and Overland Flow Routes based on EA LiDAR data.
NCC-134	Ground Conditions	67. The LLFA notes the presence of Peat beneath CRC7 as stated in section 3.3.3 and seek confirmation that measures will be put in place to ensure that during works activities,	As described in ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184] and ES Volume 1, Chapter 16 - Ground Conditions [APP-052] the extent of the peat

ID	Theme	Representation	Applicant's Response
	Water Environment	the applicant will not let the peat dry out to prevent further damage to the peat and the associated carbon emissions. Clarification is required.	within CRC7 is limited to an area adjacent to the Hempnall Beck, within the 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 be used in this area, as described in Table 2.1 of the Outline CEMP [APP-196]. The design of the trenchless crossing will be informed by ground investigation. The Outline CEMP [APP-196] requires the Applicant to undertake ground investigation and states that <i>"The results of the ground investigation will be used to inform the detailed design of the Scheme"</i>. The Hempnall Beck runs through the area where the BGS indicate that Peat and Alluvium are the surface geology and therefore the peat will be prevented from drying by (as is the baseline) being in contact with the Hempnall Beck, and water-bearing Alluvium. The use of a trenchless crossing, designed in accordance with the results of ground investigation to pass at a depth beneath the peat that will not alter the near-surface baseline conditions.

ID	Theme	Representation	Applicant's Response
NCC-135	Ground Conditions Water Environment	68. The LLFA notes the geology and hydrogeology summary given in section 3.3 is incomplete as it does not cover all the sites, sub-sites and CRCs. The LLFA has reviewed Chapter 16 as referred to in the section 3.3.1 cross reference. It is noted that while there is more discussion on the geology and hydrogeology, there is also a more extensive discussion and consideration of hydrology in the ground conditions chapter in relation to the WFD classifications than in the Flood Risk Assessment and Drainage Strategy. Furthermore, it is clear the information in Chapter 16 is desk study based and that no infiltration testing or site specific ground investigation has occurred. As the applicant has indicated, the site geology and hydrogeology is variable, and the assessment and design has been developed on desk based BGS and Environment Agency data sets and the applicant's assumptions. Therefore, it is not clear whether the data and the assumptions are representative of the conditions on site. Furthermore, there is no information available on the infiltration rates or potential included in the study. As there is no additional information provided in the FRA and	The final design of the Scheme will be informed by ground investigation. The Outline CEMP [APP-196] requires the Applicant to undertake ground investigation and states that <i>"The results of the ground investigation will be used to inform the detailed design of the Scheme"</i>. As described in ES Volume 1, Chapter 16 – Ground Conditions [APP-052] <i>"As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent"</i>. Geological and groundwater level information has been provided through historic boreholes in the vicinity of the Order Limits within ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184-186] which shows that groundwater levels are significantly below ground (greater than 10m). This information also shows that the majority of the Order Limits is underlain by significant thickness of Lowestoft Formation which is clay. On this basis, it is conservative to assume at this stage that infiltration drainage is unlikely to be feasible across the majority of the Order Limits.

ID	Theme	Representation	Applicant's Response
		Drainage Strategy, it is not possible to determine the accuracy of the assumptions made in both the FRA, Chapter 9 and Chapter 16. It is also unclear why the hydrology information has not been included in the FRA and Drainage Strategy. The LLFA reminds the applicant that in relation to the preparation of the Environmental Statement, the FRA and Drainage Strategy is considered the evidence base for the Environmental Statement. However, that is not possible when the information that the FRA and Drainage Strategy relies on is in the technically focused chapters of the Environmental Statement. Further work, information and clarification is required.	The LLFA stated in a meeting on the 18 August 2026 that infiltration testing for detailed design would require a test/borehole at the location of each infrastructure (i.e. standalone converter/inverter unit). The locations of these units are not finalised and therefore undertaking testing at this stage could lead to abortive results. Therefore, given the information within the historic boreholes close to the site and to avoid abortive testing that may not relate to the locations of infrastructure at detailed design, intrusive ground investigations including infiltration testing will be undertaken post-consent to inform the detailed surface water drainage design. The Applicant notes that there is more discussion on WFD classifications in ES Volume 1, Chapter 16 – Ground Conditions [APP-052], however this is covered further within the ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163].
NCC-136	Water Environment	69. In section 3.4 of the FRA and Drainage Strategy, the applicant is inconsistent when they state in section 3.4.1 that the land “is not served by any existing formalised surface water drainage systems” before going on to state “several field drains are present along field boundaries”. While in section 3.1.2, the	The Applicant notes this comment and maintaining integrity of drainage channel/ordinary watercourse network. Formalised surface water drainage systems refer to pipe networks and attenuation systems. The Applicant confirms that none of these features are

ID	Theme	Representation	Applicant's Response
		applicant states that "other smaller unnamed ordinary watercourses / field boundary ditches are present within several of the Sub-Sites." Therefore, it is clear by the applicant's own assessment that an existing formal surface water drainage system is present in these areas at present. The integrity of this drainage network will need to be maintained, and any damage will need to be either avoided or repaired where appropriate. Further work and consideration is required.	present in the Study Area and therefore where field drains are mentioned this refers to ditches.
NCC-137	Water Environment	70. In the LLFA notes in section 4.3.3, there is no discussion on the lifetime of the proposed scheme and how that relates to the Peak Rainfall Intensity climate change considerations. Further clarification is required.	The highest Upper End allowance of +45% allowance has been used for the assessment of surface water drainage attenuation requirements as a conservative approach for the National Grid Substation, Project Substations and BESS regardless of development lifetime in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] .
NCC-138	Water Environment	71. The LLFA notes the applicant's confident assumption in section 5.2.4 that increased vegetation cover in the PV Solar fields would reduce flooding to villages due to an increase in the interception of surface water. At present, the applicant has not provided evidence to demonstrate this across each of the catchments and communities. For the	The Applicant notes this comment and provides further information below. During the winter (and wetter) months, the soil is likely to be bare following harvesting of crops and studies (<i>Copernicus</i> , <i>Land use classes Mannings n</i> - <i>NHESS</i>) have identified roughness coefficients of

ID	Theme	Representation	Applicant's Response
		Environmental Impact Assessment and due to the lack of site specific evidence, it would be more appropriate for the applicant to assume that at best there would be no change on the current surface water flood risk situation rather than a betterment. Further work and information is required to demonstrate whether there is a change or a betterment and which catchments would experience that change. Further work and information is required.	bare soil/ploughed fields to be 0.05 (less drag) and grasslands as 0.25. It is understood that slope also has a factor in determining roughness, but there is evidence support that even on a steep slope there would be increased drag/slowed rate of runoff down the field. The summary below highlights some of the academic research supporting solar panels effect on runoff and the use of land management strategies for reducing runoff: • Cook & McCuen (2013) outlines that solar panels do not have a significant effect on runoff volumes or peak flows when vegetation is present. For example, the article states "Inclusion of the panels did not have a significant hydrologic impact'. Runoff is only increased when ground beneath panels is bare, which is not the case for the sites. • Valderrama et al (2024) and Wang and Gao (2023) show similar results to Cook & McCuen (2013), the inclusion of solar panels had a non-significant difference in peak discharge rate. • Walston et al. (2021) showed on average native grassland under solar panels

ID	Theme	Representation	Applicant's Response
			increased water retention by 19% and 9.5% compared to agriculture and short (turf) grass. • Milazzo et al. (2023) reviews the role of grassland for erosion and flood mitigation in Europe and provides quantification that permanent grassland mitigates better runoff than arable land. • The EA (2025) published research and analysis of run-off management, the study highlights with high confidence the increase in vegetation cover (e.g. grassland) slows the flow of run-off and increases attenuation of water. The Site is currently arable land and therefore the use of grassland as a mitigation measure to reduce runoff and soil erosion will provide a betterment to the existing scenario.
NCC-139	Ground Conditions	72. It is noted that in a few areas of the proposed development groundwater flood risk has been identified as a medium risk. There is no discussion within the FRA of the additional assessment work that will be undertaken in these medium risk areas of groundwater flood risk to determine the actual groundwater floor risk. The LLFA have also reviewed Chapter 16 (Ground	Section 3.2 of ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184] provides the following borehole information in relation to groundwater levels/strikes in the vicinity of the Order Limits: • South-west (CRC2 and Sub-Site 2B): 45.0 metres below ground level (m bgl);

ID	Theme	Representation	Applicant's Response
		Conditions) and was not able to find any further information of groundwater flood risk. At present, the FRA which informs the Environmental Statement is not considering the groundwater flood risk in areas identified at a medium risk. This results in the FRA being incomplete for groundwater and inconsistent with the principles of NPPF at this time. Further information is required.	- Central west (Sub-Sites 4A, 4B, 5A & 5B): 24.0m bgl at the boundary between the Diamicton and the Chalk - North-east (Sub-Sites 8A/8B & CRCs 10 and 13) 20.0mbgl - East (Sub-Sites 10A-10E): Resting water level of 20.1m bgl Whilst the SFRA mapping shows that certain areas of the Order Limits have a 'low-medium' susceptibility/likelihood of groundwater flooding (as presented in Section 5.6 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]), the above demonstrates that the groundwater table within the area of the Order Limits is at a significant depth below ground, which supports the conclusion that groundwater flood risk in the area (including the Order Limits) is low.
NCC-140	Water Environment	73. The LLFA notes the applicant obtained the information from the Environment Agency in September 2024 in section 5.7.4. As previously indicated in another comment, this data was received over 12 months ago. The LLFA suggests the applicant gets Environment Agency confirmation that there	The Applicant notes this comment and the EA has confirmed in email correspondence dated 14 August 2026 that the model data used within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] was still the most up to date available data at of the time of submission of the DCO Application (March 2026).

ID	Theme	Representation	Applicant's Response
		are no changes to the data provided. Further confirmation is required.	
NCC-141	Water Environment	74. The LLFA notes that in section 5.7.12, the applicant states that "The EA confirmed that the extents within CRC6 have been included by error, and that the model domain begins north of Mill Lane." There is no evidence of provided in Appendix B of the FRA to support this statement. The LLFA seek clarification on whether the applicant means Mill Road rather than Mill Lane. Furthermore, on review of the Environment Agency flood mapping for rivers, sea and Surface water, it is notable that if the upstream extent of the Hempnall Beck model is at Mill Road, then the eastern tributary upstream of Mill Road is not modelled by either the fluvial flood map or the surface water flood map. As the 2014 YareTas model continues to be in use and publicly published by the Environment Agency (even after the NaFRA2 update in March 2025), it is not clear at this time why this section of the model would be excluded. A precautionary approach would be to continue using this data until further information or evidence is provided. Further information and clarification is required.	This comment was discussed in a meeting with the LLFA on the 6 July 2026. The Applicant confirmed in the meeting that road name is Mill Road and that the Hempnall Beck tributaries upstream of this road are set within a steep topographical corridor (as shown on ES Volume 2, Figure 9.2 – Topography and Overland Flows within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] and any flood extents (fluvial or pluvial) are confined within a narrow corridor. The area of Flood Zone 2 and 3 interacting with CRC6 is narrow and the Applicant has committed to trenchless crossings for cables in this area. Commitments have been made with regard to preservation of floodplain storage where CRC6 interacts with Flood Zones 2 and 3 as secured within the Outline CEMP [APP-196], Outline DEMP [APP-198] and Design Principles, Parameters and Commitments [APP-213]. The same principle would also apply to surface water flood risk and documentation will be updated to extend the commitments to include surface water flood risk at a later deadline.

ID	Theme	Representation	Applicant's Response
			The Applicant held a meeting with the EA in December 2025 and the EA agreed the above approach and that further detailed modelling for this area of CRC6 was not required.
NCC-142	Water Environment	75. In section 5.8.5, the applicant has stated that "Smaller field ditches running through the centre of fields appear to have not been included in the LiDAR used in the modelling, leading to larger surface water extents across fields that would in reality be intercepted and conveyed by these ditches, as is considered to be the case for Sub-Site 8A and Sub-Site 2B." However, without hydraulic modelling in place to demonstrate the reduction in the surface water flood extent as part of a flood map challenge, it is not possible for the applicant to make this assumption at this time. Therefore, the applicant will either need to undertake hydraulic modelling of the ordinary watercourse to demonstrate the flood extents or apply a conservative approach and avoid the existing surface water hydraulic modelling extent. Either way, the statement is not appropriate at this time and has not adequately assessed flood risk based on the available information. Further work is required.	With regards to Sub-Site 8A, all Solar PV Panels and built infrastructure will be located outside of areas of Flood Zones 2 and 3, and outside of the surface water flood risk areas as confirmed within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] and secured within the Design Principles, Parameters and Commitments [APP-213]. The Applicant would note that the EA Flood Risk from Surface Water flood modelling does not always include localised pipes or structures, therefore the extents presented can potentially show a greater extent of flooding than what would occur in reality. In the case of Sub-Site 2B, on a review of site-specific topographical information, it would appear that flows back up into the field as the A140 main road is set higher than the field/adjacent ditch and therefore acts as a topographical barrier. Notwithstanding this, all built infrastructure will be located outside of areas of surface water flood risk as far as possible. Limited numbers of solar panels

ID	Theme	Representation	Applicant's Response
			have been located within 'low-high' surface water flood risk areas for operational reasons, however there is commitment to freeboards to ensure that they remain operational in times of flood and do not impede flood flows. The above is secured within the Design Principles, Parameters and Commitments [APP-213].
NCC-143	Design Principles, Parameters and Commitments	76. The LLFA notes in section 5.8.6 that Solar PV Arrays and associated infrastructure is commitment to being at least 10m away from an ordinary watercourse. However, while there is a limited commitment to avoid the surface water flow paths there is no mention of an offset distance for these structures from flow paths. Clarification is required.	The Solar PV Panels are raised on narrow supports at an appropriate freeboard above the ground and anticipated flood depths as secured within the Design Principles, Parameters and Commitments [APP-213] . It is therefore considered that an offset for the Solar PV Panels is not required as they are designed to remain operational in times of flood.
NCC-144	Water Environment	77. The LLFA notes the figures in 9.4 in relation to the surface water flood extents are stated by the applicant to show the crop lines (section 7.2.5). While the LLFA notes that some crop lines are shown, a surface water flow path along the field boundaries and in line with existing ordinary watercourses on Site 1B. Therefore, the applicant has not accurately represented the information contained within their evidence base. It is	The Applicant acknowledges surface water flow paths that run through the centre and south of Sub-Site 1B. The maximum extents of the National Grid Substation and Project Substation as shown on the Works Plans [AS-002 and AS-003] have been located such they are located outside of these flow routes and infrastructure is located at least 10m from ordinary watercourses as secured within the Design Principles, Parameters and Commitments [APP-213] .

ID	Theme	Representation	Applicant's Response
		noted the background mapping in Figures 9.1 to 9.4 does not appear to clearly depict the existing watercourses and waterbodies that are shown on readily available OS mapping. Further consideration and information is required.	
NCC-145	Water Environment	78. The LLFA notes that in section 7.2.7, the applicant has considered including a limited commitment for the inclusion of a freeboard for the "associated electrical equipment will be set with an appropriate freeboard above the surrounding ground and flood levels", although no measurement is given. The section goes on to reference section 8.1, however on review of section 8.1 this relates to fluvial flood risk rather than surface water flood risk. As previously stated in this response, the LLFA Developer Guidance states that a freeboard of at least 150mm between the finished ground level and the "associated electrical equipment" will be required. Further information and commitment is required.	Section 8.1 paragraphs 8.1.6-8.1.8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] provides information in relation to freeboards of the solar panels and inverter/converter units in relation to surface water flood risk. The Applicant clarified in a meeting with the LLFA on 6 July 2026 that the sensitive electrical equipment associated with the solar panels is set at the top of the narrow support that the panel sits on and would therefore have significant freeboard above ground level and anticipated surface water flood depths.
NCC-146	Water Environment	79. In section 7.2.7, the applicant states "Any encroachment into larger areas of higher surface water flood risk areas from these parts of the Scheme is limited to Solar PV Arrays". This indicates that while the	The LLFA advised the Applicant in the meeting on 6 July 2026 that whilst infrastructure can be located within areas of higher surface water flood

ID	Theme	Representation	Applicant's Response
		sequential test has been applied, it has focused on one source of flood risk, fluvial flood risk, above other sources of flood risk. However, as previously identified in section 7.2.2, all sources of flood risk should be taken into account. Further work is required.	risk, the preference is for infrastructure to be located outside of these areas. The Sequential Test has been undertaken for the Order Limits which considers all sources of flood risk (see Planning Statement [APP-209]). The Applicant notes this, however for Scheme operational purposes, it is considered necessary to have limited areas of solar panels within higher surface water flood risk areas. The panels are designed to remain operational in times of flood and to not impede flood flow routes as set out in the mitigation in Section 8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] and secured within the Design Principles, Parameters and Commitments [APP-213].
NCC-147	Water Environment	80. The LLFA notes the improvements in the application of the sequential test that were highlighted in the LLFA's previous PEIR response. The LLFA notes the applicant agrees with the LLFA that the BESS is considered as a Highly Vulnerable class of development. However, the applicant does not go on to state in section 7.1 of the FRA the level of flood risk on the BESS site. Further information is required.	The Applicant notes this comment and section 7.1 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. The BESS is located within Flood Zone 1 and within an area of 'very low' to 'low' surface water flood risk. Flood risk from other sources for the BESS is considered to be low as assessed within Section 5 of ES Volume 3, Appendix 9.1 – Flood

ID	Theme	Representation	Applicant's Response
			Risk Assessment and Outline Surface Water Drainage Strategy [AS-018].
NCC-148	Water Environment	81. In relation to section 8.1.3, the LLFA notes the applicant's indication for applying 150mm for protection to surface water flood risk in two locations. While the LLFA is glad to see some consideration of the LLFA's feedback, it is noted the applicant has stated in section 8.1.4 that both the 300mm and the 150mm in section 8.1.3 have been applied. However, on reviewed of sections 8.1.4 to 8.1.14 the applicant has continued to apply the fluvial freeboard with no indication of the surface water flood risk being accounted for in the finished floor levels and key electrical and mechanical equipment levels above the finished ground levels across the scheme to protect the infrastructure from surface water flows. Furthermore, the one mention of the surface water freeboard in section 8.1.13 has indicated that the application may not apply the 150mm but rather 100 to 150mm for the inverter blocks. Therefore, while the applicant may have some indication of improving their design, the commitment to deliver this mitigation is either lacking or weak. Further work and information is required.	The Applicant provides further clarification on freeboards of Solar PV Panels and standalone inverter/converter units as follows. <u>Fluvial:</u> Where Solar PV Panels are located adjacent to areas of Flood Zones 2 and 3 (Sub-Sites 7B and 8A), the ground levels where the panels would be located have been compared with the EA modelled flood levels to demonstrate the minimum 300mm freeboard between bottom of panel and local flood level. <u>Surface Water:</u> The Applicant confirmed in a meeting with the LLFA on 6 July 2026 that the electrical components associated with the panels will sit at the top of the narrow support on which the panels sit which has a significant freeboard above the ground and anticipated flood depths. Where Solar PV Panels have been located within higher surface water flood risk areas, the maximum depths of flooding are typically up to and including 300mm, up to and including the 1 in 1000 (0.1%) AP event ('low' risk scenario).

ID	Theme	Representation	Applicant's Response
			Where depths of flooding are anticipated to be greater than 300mm (notably within Sub-Sites 2B and 7E), the Solar PV Panels would be raised higher to provide a greater freeboard above anticipated depths of flooding where practicable. Alternatively, the use of Single Axis Tracker panels will be considered. This is secured within the Design Principles, Parameters and Commitments [APP-213]. The Applicant notes the difference between the freeboard requirements in the LLFA Developer Guidance and that specified within DCO documentation. The referenced LLFA developer guidance recommendation for 150mm is understood to be focussed primarily on new buildings for habitation, which has a different degree of flood risk to the works over the proposed solar scheme. The requirements for freeboard above surrounding ground have been taken into consideration for the site infrastructure elements (i.e. standalone converter/inverter units/switchgear) and is typically based on a minimum 100mm freeboard above proposed surrounding ground levels, with flood resilient elements of the construction included where necessary at lower level. This will be confirmed at the detailed design stage.

ID	Theme	Representation	Applicant's Response
NCC-149	Water Environment	82. In section 8.3.3, the LLFA notes the applicant's inclusion of "temporary construction access ramps" to facilitate watercourse crossings. It is not clear what the design of these ramps would entail although they do sound like they are a form of bridge and/or culvert structure. There is a lack of information about these structures. However, the LLFA is clear that as they would cross a watercourse, consideration of whether a consent is necessary will be required. Further information is required.	The Applicant refers to its response to NCC-115.
NCC-150	Water Environment Outline Construction Environmental Management Plan	83. The LLFA notes the avoidance areas are referred to in section 8.3.6 and a cross reference to the OCEMP is made. On review of the CEMP there was a list available in Table 2.1, although there was no plan depicting the extents of the avoidance areas. Therefore, it is not possible to determine the approximate extents of them at this time. It is also noted that there is no discussion on the potential for breakouts associated with HDD and the potential effects on the watercourses should such an incident occur. The LLFA have only been able to find one mention of this risk in the OCEMP that states "a breakout contingency procedure will be included in the detailed CEMP(s) to manage	The approach to Avoidance Areas is set out in the Outline Cable Route Construction Statement [APP-216] and Outline CEMP [APP-196]. Avoidance Areas are also depicted on ES Volume 2, Figure 4.3 - Key Construction Phase Features [APP-061]. As noted in the LLFA representation, the Outline CEMP [APP-196] states that a breakout contingency procedure will be included in the detailed CEMP to manage any accidental releases of drilling fluid. The Outline CEMP [APP-196] is secured through Requirement 13. Detailed management plans will be submitted to and approved by the relevant planning authority.

ID	Theme	Representation	Applicant's Response
		any accidental releases of drilling fluid". There is no consideration of this risk in either the Environmental Statement or the FRA and Drainage Strategy. Further information is required.	ES Volume 1, Chapter 9 – Water Environment [APP-045] has considered the embedded mitigation measures secured through the outline management plans.
NCC-151	Water Environment	84. The applicant states in section 9.2.1 that the outline surface water strategy has been prepared in accordance with the NCC 'LLFA Statutory Consultee for Planning Guidance Document'. However, this has not been evident to date on simple design matters such as the 150mm freeboard surface water resistance across the development. Further work is required.	The Applicant notes where there may be deviations away from the LLFA Developer Guidance (e.g. inverter/converter unit freeboard). The referenced LLFA Developer Guidance recommendation for 150mm is understood to be focussed primarily on new buildings for habitation, which has a different degree of flood risk to the works over the proposed solar scheme. The requirements for freeboard above surrounding ground have been taken into consideration for the site infrastructure elements (i.e. standalone inverter/converter units, switchgear) and is typically based on a minimum 100mm freeboard above proposed surrounding ground levels, with flood resilient elements of the construction included where necessary at lower level. This will be confirmed at detailed stage. It is noted that the LLFA Developer Guidance makes reference to undertaking site-specific ground investigations to inform the surface water drainage design. The Order Limits cover a large area and the locations of certain infrastructure e.g.

ID	Theme	Representation	Applicant's Response
			standalone converter/inverter units have not yet been confirmed. As such, it was considered more appropriate to undertaking these investigations post consent. Further information will be provided at a later deadline on the sizing of the access track drainage features and indicative outfall locations to adjacent watercourses to confirm a Plan B drainage strategy is feasible. A surface water drainage strategy has been developed for the BESS and Project Substation areas based on a discharge to watercourse option (for pollution management) with a lined drainage system. The drawings appended to ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] show the indicative location of the compounds and attenuation, flow controls and outfall pipes in the south-western part of the Order Limits. The strategy has been developed based on the level of detail available at the time of preparation, with the detailed design secured through DCO Requirement 11 of the draft DCO [AS-032].
NCC-152	Water Environment	85. In the single sentence section 9.4.3, the applicant identifies that "Rainwater re-use may be feasible for the Scheme for non-potable uses and this will be considered	The non-potable uses (as set out in the DEFRA National Standards for sustainable drainage

ID	Theme	Representation	Applicant's Response
		further at the detailed design." However, there is no indication of where or what these non-potable uses are. Therefore, it is not clear to what extent this has been considered as part of the surface water drainage strategy. Further information is required.	systems) are for irrigation for landscaping or toilet flushing. Given the retention of open land space (albeit a change of cover from agricultural/bare soil to grass cover all year round) and limited personnel presence for the Scheme, the use of rainwater re-use may be limited, but is to be confirmed at detailed design.
NCC-153	Water Environment Ground Conditions	86. At present, the applicant has not obtained any site specific ground investigation results for the extensive site. While the LLFA acknowledges the proposed development is in the early design stage, the applicant has had opportunity to access the land within the order limits and it would have been possible to obtain some preliminary infiltration testing results, particularly in key areas of the development such as the substations and BESS sites. At present the applicant is reliant on strategic desk-based information. The LLFA guidance (section 10.1.2) is also clear that "The LLFA would expect all submitted Drainage Strategies to include an assessment of the suitability of the underlying geology to discharge collected surface water to the ground via infiltration. Information is expected to evidence that infiltration is or is not possible (in the form of testing)." At	The Applicant notes the requests from the LLFA to undertake site-specific ground investigations to confirm ground conditions across the Order Limits. The detailed design of the Scheme will be informed by ground investigation. The Outline CEMP [APP-196] requires the Applicant to undertake ground investigation and states that "<i>The results of the ground investigation will be used to inform the detailed design of the Scheme</i>". As described in ES Volume 1, Chapter 16 – Ground Conditions [APP-052] "<i>As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent</i>".

ID	Theme	Representation	Applicant's Response
		present, this information is not available. Further work is required.	Geological and groundwater level information has been provided through historic boreholes in the vicinity of the Order Limits within ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184-186] which shows that groundwater levels are significantly below ground (greater than 10m). This information also shows that the majority of the Order Limits is underlain by significant thickness of Lowestoft Formation which is clay. On this basis, it is conservative to assume that infiltration drainage is unlikely to be feasible across the majority of the Order Limits. The LLFA stated in a meeting on the 18 August 2026 that infiltration testing for detailed design would require a test/borehole at the location of each infrastructure (i.e. standalone converter/inverter unit). The locations of these units are not finalised and therefore undertaking testing at this stage could lead to abortive results. Therefore, given the information within the historic boreholes close to the site and to avoid abortive testing that may not relate to the locations of infrastructure at detailed design, intrusive ground investigations including infiltration testing will be undertaken post-consent to inform the detailed surface water drainage design.

ID	Theme	Representation	Applicant's Response
NCC-154	Water Environment	87. The LLFA notes that in section 9.4.11, the applicant has assumed that "infiltration drainage is not feasible" without a suitable evidence base. This section then goes on to state that "Substations within the Sub-Sites will have a piped outfall to a watercourse for the purposes of this assessment in accordance with LLFA requirements." The LLFA is clear that for a Plan B drainage strategy to be accepted, the location of the discharge point is needed so that it is possible to demonstrate there is a viable surface water management solution including discharge location. Information to demonstrate this has not been provided at this time and therefore the drainage strategy is not in accordance with the LLFA Developer Guidance as stated by the applicant in section 9.2.1. Further information is required.	The Applicant notes this comment. For pollution management reasons, it is intended for all Substations to have lined surface water drainage systems with a controlled discharge to QBAR to the nearest ordinary watercourse as set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. Ordinary watercourses are located in proximity to the 132kV Project Substations within Sub-Sites 4B, 7F and 10C, and the 400kV Project Substation proposed within Sub-Site 5A for surface water disposal as shown on Figure 9.1 Site Location and Watercourses in Appendix A of this report and the site topographic survey which will be used to inform the detailed drainage design (secured through DCO Requirement 11).
NCC-155	The Scheme	88. The LLFA seeks clarification in relation to section 9.6.1, which states "The Solar PV Arrays will be installed in rows and mounted on slim, pile driven posts with limited numbers of concrete feet for tracker panels." It is not clear to the LLFA whether the concrete feet would only be used on the tracker panels or if that the Solar PV Arrays	The Applicant acknowledges the LLFA's query and clarifies that the use of concrete feet is not linked to tracker panels, but rather to areas requiring archaeological protection. As set out in ES Volume 1, Chapter 4 – The Scheme [APP-040], the most common installation solution on existing UK solar farms is to drive the piles directly into the ground without the need for excavation for foundations and avoiding

ID	Theme	Representation	Applicant's Response
		would be partly provided through the use of tracker panel. Further clarification is required.	disturbance to the surrounding land surface (soils). This installation method, to a maximum depth of 4m (dependent on ground conditions), will be used other than in areas where archaeological protection is required, where concrete feet or other non-ground penetrative techniques will be used to secure the Mounting Structures. This commitment applies to both Single Axis Tracker panels and Fixed South Facing panels equally. In respect of the choice of panel type, the Scheme would utilise either Single-Axis Tracker Panels (Option A) and/or Fixed Panels (Option B). The Applicant retains flexibility to use either or both options across the Scheme, with the final decision to be confirmed at the detailed design stage, as set out in the Design Principles, Parameters and Commitments [APP-213]. It is therefore not the case that Solar PV Arrays would only be partly provided through tracker panels, either type may be deployed across the Solar PV Arrays. The use of Single Axis Tracker panels is also identified as a flood resilience measure, with the Design Principles, Parameters and Commitments [APP-213] confirming that 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.

ID	Theme	Representation	Applicant's Response
			The use of concrete feet or other non-ground penetrative techniques where archaeological protection is required is secured through the Design Principles, Parameters and Commitments [APP-213] and Requirement 5 of Schedule 2 to the draft DCO [AS-032] .
NCC-156	Water Environment	89. In section 9.6.3, the applicant has stated "Based on the above, the impact of these Solar PV Arrays is negligible with the only ground level impact being the pile-driven posts. These posts each have a typical effective ground level footprint of 2.7mm ² (0.003m ²). However, the LLFA notes that 2.7mm ² is not 0.003m ² but rather 0.0000027m ² . While 0.003m ² is actually 3000mm ² . Therefore, the current statement in the FRA is unclear and potentially incorrect. Further clarification and work is required.	The Applicant notes this error. Notwithstanding, this will not result in any changes to the conclusions of the assessment.
NCC-157	Transport and Access	90. The LLFA notes that in section 9.7.2, the applicant indicates that "Where practicable, existing field accesses will be utilised for access between field parcels and existing agricultural tracks will remain accessible for agricultural and habitat management activities over the operational lifetime of the Scheme." However, the applicant has not	The Applicant refers to its response to NCC-096.

ID	Theme	Representation	Applicant's Response
		identified where and how many of these tracks are available for the proposed development to use. Further information is required.	
NCC-158	Transport and Access Water Environment	91. In relation to section 9.7.3 and 9.7.4, 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	The Applicant refers to its response to NCC-116.

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		to be achieved and surface water runoff is very likely to be experienced. 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. Any improvements or widen of the existing access tracks will also be considered as new access road impermeable areas. In addition, the applicant has not identified the amount, scale or extent of the proposed internal tracks, access tracks and haul roads that would be present for the construction, operation and decommissioning phases. Further information is required.	
NCC-159	Water Environment	92. In section 9.8, the applicant has indicated that infiltration drainage is proposed for the inverter/converter units, "with appropriate overflow outlet, if required, should infiltration testing confirm that rates are too low to facilitate infiltration drainage as a stand-alone	As set out in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] , it is intended that even if infiltration is not feasible, the inverter/converter unit attenuation systems will be unlined to allow natural filtration through the

ID	Theme	Representation	Applicant's Response
		solution.” However, in section 9.4, it was previously stated by the applicant that infiltration drainage was generally not viable due to the ground conditions. In section 9.4.5 the applicant indicates that “Boreholes located typically 100-250m from the Order Limits show the Diamicton to be of significant thickness (minimum 10.0m) and to consist of blue/yellow or silty/sandy clay.” However, later in section 9.4.8, the applicant states that “Shallow features that utilise infiltration may be feasible for the inverters” yet in section 9.8.4 and 9.8.5, the applicant indicates that they expect “runoff naturally percolates through the base”. There is no clear drainage design available to support these features, the evidence provided by the applicant is limited and not supportive toward identifying whether there is infiltration potential and yet the applicant presents infiltration as a viable drainage option for an unknown number of Inverter / Convertor Units in unspecified locations. There is also no indication of where the applicant would discharge to the runoff to, should infiltration not be possible. Further information is required.	aggregate blanket or filter drain base to the strata beneath. The focus is therefore not ‘formal infiltration’ but percolation and movement through to the strata beneath as occurs in the existing scenario. Section 9.8 specifies an option for a suitable outlet to watercourse as an alternative option and to ensure emptying of the attenuation. The detailed design of the Scheme will be informed by ground investigation. The Outline CEMP [APP-196] requires the Applicant to undertake ground investigation and states that “<i>The results of the ground investigation will be used to inform the detailed design of the Scheme</i>”. As described in ES Volume 1, Chapter 16 – Ground Conditions [APP-052] “<i>As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent</i>”.

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NCC-160	Water Environment	93. In relation is section 9.9, the LLFA notes the greenfield runoff rates and quick storage estimates have been summarised and the calculations were provided in Appendix D. The LLFA notes that for both the single Greenfield Runoff rate and the single quick storage estimate is for an undefined location and it is not clear where across the wide ranging area this calculation is based upon. As there are 33 sub-sites and 14 CRC sites that are spread across six River Basins each with variable ground conditions (as indicated in chapter 16), one greenfield runoff rate and one quick storage estimate at an unidentified location is not appropriate. Furthermore, the quick storage estimate was for a 1 ha area, while the LLFA notes that it has been scaled up to the 6.5ha, the quick storage estimate calculations are not specific to the site. Further work is required.	The greenfield rates have been calculated using FEH descriptors for the area of the BESS, National Grid Substation and Project Substations. As the LLFA has observed, the Order Limits cover a large area, and the surface water drainage arrangements mostly pertain to the south-western part where the BESS, National Grid and Project Substations are located. There will be little infrastructure across the rest of the Order Limits apart from access tracks and inverter/converter units that will require formalised drainage, however details/locations of these elements have not yet been finalised. Surface water attenuation requirements will be refined at detailed design, which is secured through DCO Requirement 11.
NCC-161	Water Environment	94. In relation to Appendix D, the FEH22 Point Descriptors have been completely redacted so it is not possible to review this information at this time. Further unredacted information is required.	The Applicant notes this comment and redacted FEH information may be provided upon request.
NCC-162	Water Environment	95. The LLFA notes that in section 9.9 the BESS is confirmed to have been modelled as impermeable with a CV value of 1 and that	The Applicant notes this comment, although would re-iterate that the layout of the BESS has not yet

ID	Theme	Representation	Applicant's Response
		the proposed storage solution is to allow the surface water runoff from the BESS to infiltrate in to the proposed subbase of the BESS. The applicant has modelled the subbase as an area of permeable paving that is 318.5m long by 204m wide by 0.57m deep (0.65m – 0.08m), which is served by a single pipe 150mm in diameter. The approach of using a single pipe to collect water from that area is not reflective of appropriate drainage design and the LLFA would expect to see a network of pipes under draining a 6.5 ha area permeable paving. Furthermore, there has been no consideration of the subbase area that would not be available for storage due to the foundations in place to facilitate the proposed development. Furthermore, the outflow from the permeable paving unit is shown to be free flowing. On reviewing the pipe numbers in the drainage layout drawing, the LLFA noted a hydrobrake is to control the flow. However, no hydrobrake details were included in either the design calculation information or the results from the drainage calculations. Therefore, the calculations do not appear to have a flow control on them which means the discharge to the watercourse would not be controlled	been finalised and the surface water drainage strategy is therefore outline in nature at this stage. The detailed design for the surface water drainage for the BESS (and other infrastructure for the Scheme) is secured through DCO Requirement 11. The Applicant notes the omission of the Hydrobrake information and will provide through update of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] at Deadline 1.

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		and the calculations are not reflecting the proposed design presented in the drainage layout. Likewise, similar issues have been identified in the proposed substation drainage designs presented. Further work is required.	
NCC-163	Water Environment	96. In the appendix D calculations for the BESS a CV value of 1 has been applied in accordance with the LLFA Developer Guidance. However, for the National Grid Substation and the 400kV Substations, a CV of 0.75 was applied. This is not consistent with the LLFA Developer Guidance and will need to be amended. Further work is required.	This comment was discussed with the LLFA at the meeting with the Applicant on 6 July 2026. As discussed, InfoDrainage software has a Preliminary Sizing tool whereby an attenuation feature can be drawn/imported to Plan and the software based on specified parameters (rainfall, return period, storm durations, runoff coefficient etc.) will confirm whether the feature is suitably sized for the given design event. The Dynamic Sizing is similar to the Simulation Wizard in MicroDrainage whereby the whole network is run for specified storm durations and return periods based on specified rainfall data and runoff coefficient parameters. The Dynamic Sizing tool was used to run the model and for all impermeable areas/'Inflows', the runoff coefficient was set to 1 and therefore the network model outputs comply with the LLFA Developer Guidance.
NCC-164	Water Environment	97. In section 9.11, the LLFA notes the applicant has tried to undertake a water	The surface water drainage strategy presented within Section 9 of ES Volume 3, Appendix 9.1 –

ID	Theme	Representation	Applicant's Response
		quality assessment using the simple index appropriate. However, this is not possible to undertake at this stage as the applicant is unable to confirm the proposed drainage design, the proposed discharge location or the associated treatment train associated with each of the discreet drainage areas. Without more details of the proposed development and a supporting drainage scheme that is demonstrated to be viable, the assessment provided is limited in the information it can present and the results provided. Further work and information is required.	Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] is outline at this stage, and therefore the Simple Index Approach is also indicative and represents a proportionate approach. This will be refined through the detailed surface water drainage design, which is secured through DCO Requirement 11.
NCC-165	Water Environment	98. At present, the information available for the drainage system maintenance and management is limited as there is not a suitable amount of information to determine what will need to be maintained. Further work and information is required.	The surface water drainage strategy presented within Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] is outline at this stage, and therefore the Preliminary maintenance schedule provided is also indicative. This will be refined through the detailed surface water drainage design, which is secured through DCO Requirement 11.
NCC-166	Water Environment	99. The LLFA notes that some of the figures in the appendices could be more clearly depicted. For example, the watercourses on the boundary of site 8A are difficult to view in Figure 9.1, while in Figure 9.3 the ordinary	The Applicant notes this comment.

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		watercourse is not clearly visible along the southeastern boundary due to the red order limits and elsewhere on the same drawing the ordinary watercourses in the vicinity of Site 7F are not depicted even though the key indicates they are meant to be displayed. As some of the visibility of some of the information appears to inconsistent on the drawings, further work to complete the drawings with all of the stated information would be appropriate. Further work is required.	
NCC-167	Water Environment	100. As previously discussed in the LLFA's response to Chapter 9, the LLFA notes that the Environment Agency Flood Map for Rivers and Sea is a strategic model. The Environment Agency have also prepared a Flood Map for the risk of surface water flooding. While the Environment Agency have reduced the potential double counting of flood water from the watercourses in the surface water flood map, the method used for modelling surface water flooding highlights flowpaths in relation to topographical geometry, which results in the surface water flood map identifying the potential 3.3% (equivalent of flood zone 3b), 1% (equivalent of flood zone 3a) and 0.1% (equivalent of	The fluvial and surface water flood extents utilise similar colouring which may lead to further confusion. As such, it is not considered necessary to update the mapping at this time.

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		flood zone 2) flood extents. As ordinary watercourses tend to follow low topographical areas. Therefore, the surface water flood map extents can align with ordinary watercourses that have not been included in the fluvial hydraulic model. Therefore, some surface water hydraulic modelling is available for the smaller tributaries that would indicate an approximate flood extent that could be associated with the watercourses for strategic use. As the proposed development covers an area where there are a mix of ordinary watercourses and main rivers with the flood extents defined through a mix of flood zone mapping and surface water mapping, it would be appropriate for both datasets to be displayed on the same figure to obtain a better understanding of the interaction of the proposed development with the flood extents. Further work and information is considered appropriate.	
NCC-168	Outline Landscape and Ecology Management Plan	OLEMP – App 7.4 101. The LLFA notes that the proposed mowing of the grassland indicated in section 3.5.5 that a “relaxed mowing” approach will occur. The applicant has indicated that both a	The exact mechanism for managing the sward has not been determined but is likely to be cutting via mechanical operations. However, grazing or a combination of the two may also be considered. If cut operations are required they shall be carried out using machinery appropriate to the task,

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		tracker panel and a fixed panel are considered options for the PV Arrays. The LLFA is interested to know how the vegetation under the fixed panel will be cut as it is likely the mowing equipment would not be able to go far under the panels due to the frames and the height variations. Clarification on the maintenance approach for the grassland proposed to attenuate the surface water flow is required.	cylinder, rotary or mulch mowers and when weather and ground conditions are suitable. A range of proprietary mowers are available to facilitate mowing beneath panels.
NCC-169	Outline Construction Environmental Management Plan	OCEMP – App 7.1 102. The LLFA has reviewed section 3.5 of the OCEMP and notes the information provided is generic in terms of its content rather than site specific. This is due to a lack of development design information being available. Therefore, it is not possible to determine if the information provided is relevant to the management of the scheme specific risks and its associated construction works. It is noted that not all the issues identified in the OCEMP have been considered in the FRA and the relevant ES chapter. Further information is required.	As part of the EIA, appropriate mitigation measures have been developed and incorporated into the Scheme to address identified effects. The Outline CEMP [APP-196] secures outline mitigation measures to address those effects to achieve the conclusions set out in the EIA. Requirement 13 in Schedule 2 to the draft DCO [AS-032] secures that a CEMP must be submitted to and approved by the relevant planning authority, and that the CEMP must be substantially in accordance with the Outline CEMP [APP-196]. All construction works must be carried out in accordance with the approved CEMP.
NCC-170	Outline Operational Environmental	OEMP – App 7.2 103. Based on the comments provided in the FRA and Drainage Strategy it is likely that	The Applicant welcomes any suggestions which may be considered to bolster the outline plan. In any event, the plan will be subject to the approval

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	Management Plan	further work is going to be required to the OEMP.	of the relevant planning authority at detailed design stage pursuant to the DCO Requirements.
NCC-171	Outline Decommissioning Environmental Management Plan	ODEMP – App 7.3 104. The LLFA briefly notes that the ODEMP has included the mitigation and monitoring activities for the decommissioning of the National Grid Substation and Grid Connection. However previously in Chapter 4 in section 4.6.4 the applicant has stated that “The National Grid Substation and the Grid Connection Infrastructure would remain in situ.” Therefore, it is not clear to the LLFA whether the National Grid Substation and Grid Connection Infrastructure would remain or be removed as part of the decommissioning activities. Further clarification and information is required.	The Applicant refers to the response under NCC-101.
NCC-172	Design Principles, Parameters and Commitments Water Environment	Design Principles, Parameters and Commitments App 7.18 105. In Table 4.1 Works No. 1, the LLFA notes that the DC Boxes are not committed to being raised 150mm off the ground level to protect them from surface water flooding. Further work is required.	The Design Principles, Parameters and Commitments [APP-213], includes the following commitments: <i>"Where a DC electrical box is required, it would sit on a Mounting Structure.</i> <i>'All electrical infrastructure associated with the panels (excluding cabling) will be elevated by the Mounting Structures so that it is no less than 300mm above the 1 in 100 (1%) Annual</i>

ID	Theme	Representation	Applicant's Response
			<i>Exceedance Probability (AEP) flood level; or, where this is not possible, as high as practicable.'</i> The DC Electrical Boxes are therefore captured by this commitment and would be elevated at least 300mm above the 1 in 100 AEP flood level, which exceeds the 150mm freeboard referenced by the LLFA. This is secured through Requirement 5 of Schedule 2 to the draft DCO [AS-032].
NCC-173	Design Principles, Parameters and Commitments Water Environment	106. The LLFA notes the inclusion of surface water management for both Integrated Conversion Units / 33kV Substations and the Standalone Conversion Units. However, these commitments are not shown in Table 4.1 of chapter 4. Therefore, there appears to be an inconsistency between these documents. Further clarification and work is required.	Table 4.1 of the Design Principles, Parameters and Commitments [APP-213] confirms that <i>'Surface water runoff of Integrated Conversion Units/33kV Sub-Distribution Switch Rooms will be managed via a filter drain around the perimeter or permeable aggregate surface with underlying sub-base, with appropriate overflow outlet, if required'</i>, with an equivalent commitment for Standalone Conversion Units. These commitments are secured through Requirement 5 of Schedule 2 to the draft DCO [AS-032]. Table 4.1 of ES Volume 1, Chapter 4 – The Scheme [APP-040] provides a summary of Scheme parameters for the ES, whilst the Design Principles, Parameters and Commitments [APP-213] is the securing control document. Surface water management commitments are set out in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water

ID	Theme	Representation	Applicant's Response
			Drainage Strategy [AS-018] and are secured through Requirement 11 of the draft DCO [AS-032] , notwithstanding their presentation in the summary table of ES Volume 1, Chapter 4 – The Scheme [APP-040] .
NCC-174	Design Principles, Parameters and Commitments Transport and Access Works Plan	107. In Table 4.1 for Works No. 1, it is clear this covers the Solar PV arrays and supporting infrastructure such as cabling, fencing, and temporary works like drilling pits. However, there is no inclusion for the internal access tracks that are mentioned in Chapter 4 and 9. Therefore, it is not clear whether the access tracks are to be included in Works No. 1 or whether the applicant is not able to make design commitments for them. In Chapter 9, these access tracks are indicated to the permeable, although the LLFA does not agree that this is possible due to the materials proposed and usage. However, the applicant's inconsistency on the description of the Works is concerning and leaves the LLFA unclear about what is included. The LLFA notes that in Table 4.2 a set of parameters is provided for internal access tracks. Further clarification and information is required.	The Applicant clarifies that internal access tracks fall within Work No. 7 of Schedule 1 of the draft DCO [AS-032] , not Work No. 1. Work No. 7 includes " <i>(d) improvement, maintenance and use of existing private tracks; (e) laying down of internal access tracks, ramps, bridges, means of access and footpaths</i> ", with the corresponding parameters and commitments set out in Table 4.7 of the Design Principles, Parameters and Commitments [APP-213] . The parameters and commitments for internal access tracks associated with the BESS are captured under Work No. 2 (Table 4.2), and access to the National Grid Substation is captured under Work No. 4 (Table 4.4). Table 4.7 of the Design Principles, Parameters and Commitments [APP-213] confirms the commitment that internal access tracks will be " <i>Constructed of hardcore or gravel over a levelling layer of substrate. Whilst this is designed to be permeable, further drainage features such as swales and filter drains will also be incorporated parallel to or downhill of the tracks depending on</i>

ID	Theme	Representation	Applicant's Response
			<i>topography. Depending on the slope, swales will include check dams to prevent the rapid transfer of water downslope".</i> The Applicant notes that the ES Volume 1, Chapter 4 – The Scheme [APP-040] and ES Volume 1, Chapter 9 – Water Environment [APP-045] references to permeability are consistent with this commitment, as hardcore/gravel over a levelling layer of substrate provides a permeable surface, supplemented by passive drainage features. The design commitments for internal access tracks are secured through Requirement 5 of Schedule 2 to the draft DCO [AS-032].
NCC-175	Design Principles, Parameters and Commitments Water Environment	108. In section 4.2.2 (g), it is not clear to the LLFA what is meant by “bundled impermeable surface or other form of containment system to manage surface water drainage”. While it is appreciated that this could form part of a surface water drainage system, it is not clear what areas of the BESS it will serve. It is also noted that in (i) there is also a lack of clarity around what surface is proposed to be drained of fire water. Further clarification of the area the drainage system will serve at the BESS is required.	Table 4.2 of the Design Principles, Parameters and Commitments [APP-213] confirms the commitment that the BESS Compound will be served by a sustainable drainage network designed to the 1% AEP event plus 45% climate change allowance, which will serve the entire BESS compound. Within Section 9 of ES Volume 3: Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], the drainage system for the BESS is shown to be

ID	Theme	Representation	Applicant's Response
			contained/sealed through an impermeable membrane. The Applicant confirms that the precise extent of the surfaces served by the drainage and firewater containment systems within the BESS Compound will be confirmed at detailed design stage. This approach is reflected in Section 4.5 of the Outline BSMP [APP-200], which confirms that "the detailed configuration to be confirmed at detailed design stage" and that "Final containment volumes and detailed hydraulic design will be confirmed at detailed design stage". The detailed surface water drainage scheme will be submitted to and approved by the relevant planning authority, in consultation with the Environment Agency, Norfolk County Council as lead local flood authority and Anglian Water Services Limited, secured through Requirement 11 of Schedule 2 to the Draft Development Consent Order [AS-032]. The detailed BSMP is secured through Requirement 6.
NCC-176	Design Principles, Parameters and Commitments	109. In Table 4.2, the LLFA notes there is no information on the design parameters and requirements of the BESS platform design. There is only a consideration of the foundations for the individual BESS Units. Therefore, at present there is an incomplete	Table 4.2 of the Design Principles, Parameters and Commitments [APP-213] secures the key parameters relevant to the BESS, including the maximum compound area (up to 6.5ha) and the maximum depth of foundations. Foundations will be reinforced concrete base to a maximum depth

ID	Theme	Representation	Applicant's Response
	Scheme Design	set of design parameters. Further information is required.	of 1m or piling up to 12m below ground level with a 1m pile cap. The Applicant confirms that further details will be at the detailed design stage in accordance with the parameters and commitments secured through Requirement 5 of Schedule 2 to the draft DCO [AS-032]. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and allow for a decision on the technology choice to be made at the point of procurement. The Planning Inspectorate's Advice Note Nine: Rochdale Envelope acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme to be considered.
NCC-177	Design Principles, Parameters and Commitments Water Environment	110. The LLFA notes that in Table 4.2 a set of parameters is provided for internal access tracks that are considered to be impermeable. However, there is no commitment to include suitable surface water drainage for these access tracks. Further information relating to the design and commitment to provide an appropriate	The Applicant refers to its response to NCC-116.

ID	Theme	Representation	Applicant's Response
		surface water management system for these areas and others is required to ensure there is no increase in flood risk onsite and elsewhere. Further work and information is required.	
NCC-178	Design Principles, Parameters and Commitments Water Environment	111. The LLFA notes that in section 4.3.2 b) ii), the applicant indicates that "control building or container relay rooms with associated offices, storage and welfare facilities" will be included. Previously in Chapter 4, the text in section 4.3.33 had not included the provision of offices and welfare facilities within the description for the 132kV substations. Therefore, these documents appear to be inconsistent. Furthermore, while there are commitments to include "a sustainable drainage network designed to the 1% AEP event plus 45% climate change allowance" that will serve the project substation compounds clarification is required as to whether attenuation of the future design storm event will be provided. Further clarification and information is required.	The Applicant acknowledges the LLFA's observation regarding the different levels of detail between paragraph 4.3.33 of ES Volume 1, Chapter 4 – The Scheme [APP-040] and Section 4.3.2 of the Design Principles, Parameters and Commitments [APP-213]. The Design Principles, Parameters and Commitments [APP-213] is the control document securing the design parameters and commitments for the Scheme, and confirms at Section 4.3.2(b)(ii) that both 132kV and 400kV substations will include "control building or container relay rooms with associated offices, storage and welfare facilities", secured through Requirement 5 of Schedule 2 to the Draft Development Consent Order [AS-032]. On attenuation, Table 4.3 of the Design Principles, Parameters and Commitments [APP-213] commits that "The Project Substation compounds will be served by a sustainable drainage network designed to the 1% AEP event plus 45% climate change allowance". The detailed attenuation and hydraulic design will be confirmed

ID	Theme	Representation	Applicant's Response
			at detailed design stage in the surface water drainage scheme, submitted to and approved by the relevant planning authority in consultation with the Environment Agency, Norfolk County Council as lead local flood authority and Anglian Water Services Limited, secured through Requirement 11 of Schedule 2 to the draft DCO [AS-032] .
NCC-179	Design Principles, Parameters and Commitments Works Plan	112. In section 4.4.2, it is not clear to the LLFA why infrastructure essential to the delivery of a permanent new National Grid Substation (such as access, site formation earthworks, drainage and more, has been separated out into Works No.4B away from other Substation items in Works 4A that includes substation infrastructure, control and office buildings, etc, from other aspects. It is also noted that both Works 4B and 4C contain a mixture of temporary and permanent works. It was not possible to clarify this in Chapter 4 as the section on Works No. 4 also incorporated Works No. 5. Further clarification is required.	The Applicant notes the LLFA's observation. The Works Nos. 4A, 4B and 4C reflect the drafting structure adopted in Schedule 1 of the draft DCO [AS-032], whereby Work No 4A is specifically provided to address the provision of the National Grid Substation and its immediate ancillary infrastructure (including relay/control buildings, offices and welfare). Work No. 4B covers the associated landscaping, sustainable drainage system and biodiversity mitigation and enhancement measures, and Work No. 4C covers construction access and temporary construction compounds. The spatial extents of each Work No. are shown on the Works Plan [AS-002 and AS-003]. The Applicant confirms that this separation does not alter the fact that all elements comprising Works No. 4 are necessary for the delivery and operation of the National Grid Substation, with the design parameters and

ID	Theme	Representation	Applicant's Response
			commitments for each element set out in Table 4.4 of the Design Principles, Parameters and Commitments [APP-213] , secured through Requirement 5 of Schedule 2 to the draft DCO [AS-032] .
NCC-180	Design Principles, Parameters and Commitments Water Environment	113. The LLFA notes that in Table 4.4, the applicant indicates that a commitment to include "a sustainable drainage network designed to the 1% AEP event plus 45% climate change allowance" that will serve the national grid substation compound, clarification is required as to whether attenuation of the future design storm event will be provided. Further clarification and information is required.	The Applicant notes the LLFA's observation. Table 4.4 of the Design Principles, Parameters and Commitments [APP-213] commits that " <i>The National Grid Substation Compound will be served by a sustainable drainage network designed to the 1% AEP event plus 45% climate change allowance</i> ". The detailed attenuation and hydraulic design will be confirmed at detailed design stage in the surface water drainage scheme, submitted to and approved by the relevant planning authority in consultation with the Environment Agency, Norfolk County Council as lead local flood authority and Anglian Water Services Limited, secured through Requirement 11 of Schedule 2 to the draft DCO [AS-032] .
NCC-181	Design Principles, Parameters and Commitments	114. In Table 4.3 and 4.4, the LLFA notes there is no information on the design parameters and requirements of the various substation platform designs. There is only a consideration of the foundations for structures, but the wider platform structure	The Applicant acknowledges the LLFA's observation. Tables 4.3 and 4.4 of the Design Principles, Parameters and Commitments [APP-213] secure foundation parameters and the commitment that the substation compounds will be served by a sustainable drainage network

ID	Theme	Representation	Applicant's Response
	Water Environment	has not been considered. Therefore, at present there is an incomplete set of design parameters for the substations. It is not clear whether the platform will be drained or whether only selected areas within the compounds will be drained. Further information is required.	designed to the 1% AEP event plus 45% climate change allowance, but do not currently specify the wider platform surfacing or the extent of drained surfaces. The detailed platform and surface water drainage design will be confirmed at the detailed design stage, secured through Requirement 11 of Schedule 2 to the draft DCO [AS-032], which requires consultation with Norfolk County Council as lead local flood authority.
NCC-182	Design Principles, Parameters and Commitments Temporary Construction Compounds	115. The LLFA is unclear on why the temporary construction compound has been included in Works no. 4b as previously in Chapter 4 it was stated that Works No. 8 was for "Temporary construction and decommissioning laydown areas". However, in the Design Principles, Parameters and Commitments document, section 4.4.2 and Table 4.4 are clear that a temporary construction compound is included. There are similar issues associated with Works No. 5 and 6 as the temporary construction compounds and laydown areas have been included in the Design Principles, Parameters and Commitments document, yet in Chapter 4 these appear to be included in Works No. 8. These inconsistencies will need to be	The Applicant acknowledges the LLFA's observation regarding the treatment of temporary construction compounds across Works Nos. 4, 5, 6 and 8. The Applicant confirms that this reflects the deliberate structure of Schedule 1 to the draft DCO [AS-032] , whereby Work No. 8 provides for general temporary construction and decommissioning laydown areas across the Order Limits, while Works Nos. 4, 5 and 6 separately provide for site-specific temporary construction compounds directly associated with those particular works (namely the National Grid Substation; works in connection with the existing 400kV overhead line; and works to construct the underground electrical cables (132 and 400kV) within the CRC, respectively).

ID	Theme	Representation	Applicant's Response
		resolved. Further work and clarification is required.	Paragraph 4.2.5 of ES Volume 1, Chapter 4 – The Scheme [APP-040] confirms that "<i>the work package areas can and do overlap</i>". The design parameters and commitments for temporary construction compounds are secured through Requirement 5 of Schedule 2 to the draft DCO [AS-032] in accordance with the Design Principles, Parameters and Commitments [APP-213].
NCC-183	Design Principles, Parameters and Commitments Transport and Access	116. In section 4.5.2 b) iv), the applicant identifies the works include the "laying down of internal access tracks, ramps, bridges, means of access and footpaths". While in Table 4.5 it is indicated that the Internal Access Track is associated with the Temporary Construction Compound, but it continues to not be clear to the LLFA whether these access features are temporary or permanent. The LLFA requires similar clarification in relation to the 4.5.2 c) i) ee) and 4.5.2 d) ii). Further clarification is required.	Permanent access to Work Nos. 1 to 7 (which includes Work No. 5) is provided for under Work No. 9B of the draft DCO [AS-032], while temporary construction, maintenance and decommissioning access is provided for under Work No. 9A.
NCC-184	Design Principles, Parameters and Commitments	117. While in section 4.6.2. b) ii), the applicant identifies the works include the "laying down of internal access tracks, ramps, ramps, footpaths, roads, including the laying and construction of drainage	Permanent access to Work Nos. 1 to 7 (which includes Work No. 6) is provided for under Work No. 9B of the draft DCO [AS-032], while temporary construction, maintenance and

ID	Theme	Representation	Applicant's Response
	Transport and Access	infrastructure, signage and information boards". While in Table 4.6 it is indicated the Internal Access Track will be constructed. However, it is not clear to the LLFA whether these access features are proposed to be temporary or permanent. Further clarification is required.	decommissioning access is provided for under Work No. 9A.
NCC-185	Design Principles, Parameters and Commitments Water Environment	118. In relation to section 4.7.2, the LLFA notes there is a large amount of additional works that includes, fencing, security and boundary treatments, internal access tracks, surface water drainage, earthworks, secondary temporary construction and decommissioning laydown areas and operation and maintenance buildings. It is not clear to the LLFA where these features would be located or what works they would be associated with. It appears to have overlap with the works identified in Works no. 1 to 6 and 8 to 11 in particular Chapter 4 and Design Principles, Parameters and Commitments document, although there is some overlap with other documents too. This inconsistency and, in places, contradiction means it is not clear to the LLFA what is being proposed to be built or where these structures are being located. It is therefore, difficult to determine whether these are at	The Applicant notes the LLFA's request for clarification on the works described in Section 4.7.2 of the Design Principles, Parameters and Commitments [APP-213]. These are supporting works that enable the Solar PV Sites to be constructed, operated and decommissioned, as summarised at paragraph 4.2.12 of ES Volume 1, Chapter 4 - The Scheme [APP-040]. Their spatial extent is defined on the Works Plan [AS-002 and AS-003] and corresponds to the Solar PV Sites, with maximum dimensions, offsets and Flood Zone commitments set out in Table 4.7 of the Design Principles, Parameters and Commitments [APP-213]. The apparent overlap with other works reflects the deliberate structure of the DCO, whereby the principal generating and grid connection infrastructure is described separately from the supporting works. As explained at paragraphs 4.2.18 to 4.2.22 of ES Volume 1, Chapter 4 - The Scheme [APP-040],

ID	Theme	Representation	Applicant's Response
		flood risk or pose an increase in flood risk onsite or elsewhere at this time. Further information and details is required.	the Scheme has adopted the Rochdale Envelope approach, with precise locations to be confirmed at detailed design in accordance with the Design Principles, Parameters and Commitments [APP-213], secured by Requirement 5 in Schedule 2 of the draft DCO [AS-032]. In relation to flood risk, the Design Principles, Parameters and Commitments [APP-213] already secures that operational and maintenance buildings will be located outside Flood Zones 2 and 3, that access tracks within Flood Zones 2 or 3 or significant surface water flow routes will be kept at existing ground level, and that construction compounds and stockpiles will not be located within Flood Zones 2 and 3. ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018 and AS-019] assesses the Scheme against these parameters and concludes that it is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere. The detailed surface water drainage scheme will be submitted to and approved by the relevant planning authority in consultation with the LLFA under Requirement 11 of the draft DCO [AS-032].
NCC-186	Design Principles,	119. In section 4.8, the applicant describes the works included in the temporary	The Applicant notes the LLFA's request for clarification on the works described in Section 4.8

ID	Theme	Representation	Applicant's Response
	Parameters and Commitments Water Environment	construction and decommissioning laydown areas. It is not clear whether these areas are in addition to or the same as the areas associated with the identified in Works no. 1 to 7 and 9 to 11 in particular Chapter 4 and Design Principles, Parameters and Commitments document. It is also not clear where these areas are to be located or what works they are to be facilitating. These inconsistencies and contradictions make it unclear to the LLFA what is being proposed to be built, where these structures are being located and what works they are supporting within the scheme. The LLFA notes that a generic reference to the Works Plans was made in section 4.8.1, however, the works are difficult to interpret, and it was not possible for the LLFA to get the individual layers to function work as described. Therefore, it is difficult to determine whether these are at flood risk or pose an increase in flood risk onsite or elsewhere at this time. Further information and details is required.	of the Design Principles, Parameters and Commitments [APP-213]. Work No. 8 makes provision for the construction compounds associated with the solar sites as illustrated on ES Volume 2: Figure 4.2 - Indicative Temporary Construction Compound Locations [APP-060]. These are also shown spatially on the Works Plan [AS-002 and AS-003]. Paragraphs 4.4.36 and 4.4.37 of ES Volume 1, Chapter 4 - The Scheme [APP-040] distinguish between "temporary construction compounds" (which comprise hardstanding, car parking, welfare offices and workshops, security infrastructure, materials storage, site drainage and utilities connections) and "temporary laydown areas" (additional areas within the Order Limits established to service local works, allowing construction vehicles to turn off the public highway and park safely). Both are also identified in Section 2.3 of the Outline CTMP [APP-201]. Work No. 7 makes provision for 'secondary temporary construction and decommissioning laydown areas', which as noted above are smaller compounds that are set up as works develop sequentially through the solar sites. These locations are not specified, as is normal in any

ID	Theme	Representation	Applicant's Response
			solar DCO application, and as noted from the Works Plan [AS-002 and AS-003] could be sited anywhere within the wider Work No.7, but as such, their locations can be considered by the local planning authority through the detailed CEMP, under Requirement 13 of the DCO. As noted above, Works Nos. 4, 5 and 6 separately provide for site-specific temporary construction compounds directly associated with those particular works (namely the National Grid Substation; works in connection with the existing 400kV overhead line; and works to construct the underground electrical cables (132 and 400kV) within the CRC, respectively). As explained at paragraphs 4.2.18 to 4.2.22 of ES Volume 1, Chapter 4 - The Scheme [APP-040], the Scheme has adopted the Rochdale Envelope approach, with precise locations to be confirmed at detailed design in accordance with the Design Principles, Parameters and Commitments [APP-213], secured by Requirement 5 in Schedule 2 of the draft DCO [AS-032]. In relation to flood risk, the Design Principles, Parameters and Commitments [APP-213] already secures that operational and maintenance buildings will be located outside Flood Zones 2 and 3, that access tracks within Flood Zones 2 or 3 or

ID	Theme	Representation	Applicant's Response
			significant surface water flow routes will be kept at existing ground level, and that construction compounds and stockpiles will not be located within Flood Zones 2 and 3. ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018 and AS-019] assesses the Scheme against these parameters and concludes that it is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere. The detailed surface water drainage scheme will be submitted to and approved by the relevant planning authority in consultation with the LLFA under Requirement 11 of the draft DCO [AS-032].
NCC-187	Design Principles, Parameters and Commitments Temporary Construction Compounds	120. In Table 4.8, it is clear that surface water attenuation is only associated with the compounds in Table 4.8. However, the works in section 4.8.2 are described as "laydown areas". Therefore, it is not clear whether these are the same areas as typically compounds and laydown areas are different in their usage and design. Further clarification is required.	The Applicant notes the LLFA's request for clarification on the terminology used in Section 4.8.2 and Table 4.8 of the Design Principles, Parameters and Commitments [APP-213]. Paragraphs 4.4.36 and 4.4.37 of ES Volume 1, Chapter 4 - The Scheme [APP-040] distinguish between "temporary construction compounds" (which comprise hardstanding, car parking, welfare offices and workshops, security infrastructure, materials storage, site drainage and utilities connections) and "temporary laydown areas" (additional areas within the Order Limits

ID	Theme	Representation	Applicant's Response
			established to service local works, allowing construction vehicles to turn off the public highway and park safely). Both are also identified in Section 2.3 of the Outline CTMP [APP-201] .
NCC-188	Design Principles, Parameters and Commitments Water Environment (Drainage)	121. In section 4.9.2 a) iv) and 4.9.2 b) iv), the applicant indicates that drainage features would be located on private land. It is not clear to the LLFA whether this land would be under the temporary or permanent control of the applicant in order to maintain the drainage structures to ensure continued design capacity. Furthermore, in the associated Table (Table 4.9) there is no mention or commitment to included drainage structures for the "concrete" access points. Further clarification and information is required.	The Applicant notes the LLFA's request for clarification. The wording of Work No. 9(a)(iv) and 9(b)(iv) of the Design Principles, Parameters and Commitments [APP-213] identifies that the offsite works to structures, boundary features and drainage features on private land are "in connection with the movement of abnormal indivisible loads". Section 6.3 of the Outline CTMP [APP-201] sets out the Highway Works provisionally identified to accommodate AIL movements, including areas where AIL vehicles may overrun or oversail. The Applicant acknowledges the LLFA's observation that Table 4.9 does not include a drainage commitment for the concrete access points. The detailed surface water drainage scheme for the Scheme will be submitted to and approved by the relevant planning authority in consultation with the LLFA under Requirement 11 of the draft DCO [AS-032] .
NCC-189	Design Principles,	122. The LLFA notes that in Works No. 10, the applicant proposes to include ponds,	The Applicant notes the LLFA's request for clarification on the works described in Section

ID	Theme	Representation	Applicant's Response
	Parameters and Commitments	swales, trenching and drainage to support the creation of habitat management areas. However, it is not clear what features or surfaces would need to be drained. A review of chapter 4 notes the reference to the Design Principles, Parameters and Commitments document for more information about the commitments, but the information in this document does not provide that clarification or information. The LLFA notes that in section 4.10.3 there is a cross reference to the Outline LEMP, however, on review of the OLEMP, it was not possible for the LLFA to find reference to the swales, trenching and drainage to support the creation of habitat management areas. On review of Table 4.10, the LLFA notes that internal access tracks are listed as a feature in the table but no environmental mitigation measures, which appears to be inconsistent with the information in section 4.10. For example, section 4.10.2 e.) states "means of access" but there is no mention of an internal access track. This is atypical compared to the approach taken in other section of this document. Furthermore, the text also states in c.), d.) and f.) that environmental, drainage and	4.10.2 and Table 4.10 of the Design Principles, Parameters and Commitments [APP-213]. Work No. 10 relates to the creation and maintenance of habitat management areas, as summarised at paragraph 4.2.15 of ES Volume 1, Chapter 4 - The Scheme [APP-040]. The design and implementation of the habitat management areas, including the specific location and configuration of ponds, swales, trenching, drainage, means of access and planting described in Section 4.10.2, is a matter for the detailed design stage and will be set out in the detailed Landscape and Ecology Management Plan (LEMP), which will be substantially in accordance with the Outline LEMP [APP-199] and secured through Requirement 7 in Schedule 2 of the draft DCO [AS-032]. The detailed LEMP will be submitted to and approved by the relevant planning authority, providing an opportunity for the specific features and their drainage arrangements to be reviewed.

ID	Theme	Representation	Applicant's Response
		landscaping works was included but this is not shown in Table 4.10. Further clarification and information is required.	
NCC-190	Design Principles, Parameters and Commitments	123. In section 4.11.2 a.) i.), there is mention of structures that could cross ordinary watercourses. However, there is no mention of the design parameters that would be required for either culverting of structures to cross ordinary watercourses. Therefore, it is not clear to the LLFA whether the applicant has commitment ensuring there is no increase in flood risk from these structures. Further information is required.	The Applicant notes the LLFA's request for clarification on the works described in Section 4.11.2(a)(i) of the Design Principles, Parameters and Commitments [APP-213]. The Applicant draws attention to the commitments already secured in Table 4.7 of the Design Principles, Parameters and Commitments [APP-213] for watercourse crossings within the Sites, which identify a hierarchy of crossing forms in order of least to most impact: single-span structures that do not interfere with the channel; span structures with in-stream supports or pre-cast structures with natural bed; closed culverts with artificial invert; and open trench with over-pumping. The specific design of any crossing structures required to support permissive paths across ordinary watercourses is a matter for the detailed design stage and will be informed by the outline drainage strategy in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018 and AS-019], which concludes that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere. The detailed surface water drainage scheme will be submitted to and

ID	Theme	Representation	Applicant's Response
			approved by the relevant planning authority in consultation with the LLFA under Requirement 11 of the draft DCO [AS-032] .
NCC-191	Works Plan	124. This appears to be a stand alone document. However, the key for the symbology is only a number and relies on the description of the project works in the Environmental Statement resulting in the plans not being able to be interpreted without another document. The LLFA further notes that it was unable to find a description titled 1(d) in the Work No. 1 description 4.2.6 of ES Chapter 4. This is not the only occasion where there appears to be an inconsistency or a lack of information that enables the reader to interpret the Works Plans through the descriptions provided in ES Chapter 4. For example, Works No. 6 and 9 is divided into A and B on the Works Plans but there is not description of A and B in the Works description provided in chapter 4 (4.2.11 and 4.2.14). However, there is a breakdown provided for Works No. 3, 4 and 5. Further clarification and information is required.	The Applicant notes the LLFA's observations regarding the Works Plan [AS-002 and AS-003] and its cross-referencing with ES Volume 1, Chapter 4 - The Scheme [APP-040]. The Applicant acknowledges that the summary descriptions of Work No. 1 (paragraph 4.2.6), Work No. 6 (paragraph 4.2.11) and Work No. 9 (paragraph 4.2.14) of ES Volume 1, Chapter 4 - The Scheme [APP-040] do not include the subdivision letters or subdivisions used elsewhere in the ES and on the Works Plan [AS-002 and AS-003], whereas Work Nos. 3, 4 and 5 (paragraphs 4.2.8 to 4.2.10) do include such breakdowns. The full descriptions of the Work Numbers, including all subdivisions, are set out in Schedule 1 of the draft DCO [AS-032] and reflected in Section 4 of the Design Principles, Parameters and Commitments [APP-213]. These are the control documents that define the extent of the authorised development and against which the Works Plan [AS-002 and AS-003] should be read.
NCC-192	Works Plan	125. The LLFA has reviewed the Works Plans. However, even when following the	A detailed step-by-step explanation on how to access and view the Works Plan is provided in

ID	Theme	Representation	Applicant's Response
		applicant's direction to use the layers function in the PDF, it was not possible for the LLFA to get the individual layers to function as described. Therefore, the LLFA found it difficult to interpret the individual layers and the information submitted was not clear for review as the multiple hatched lines in similar colours made it difficult to read. The LLFA request the Works Plans are improved for clearer interpretation and understanding. It would also be helpful if the environmental constraints such as flood extents and areas of environmental protection were also included to improve the reader's understanding of the proposed works context. Further work and information is required.	Section 1.1 of the Works Plan [AS-002] and [AS-003]. The Applicant would welcome further engagement with the LLFA to assist with the operation of the layered PDF, should any specific technical difficulties persist. The spatial extents of each Work Number described in Schedule 1 of the draft DCO [AS-032] are set out in the accompanying Works Plan [AS-002] and [AS-003]. The purpose of the Works Plan is to define the maximum spatial extents of the authorised development in accordance with Article 3 of the draft DCO [AS-032]. The Applicant draws attention to the fact that environmental constraints, including flood extents and areas of environmental protection, are shown on separate plans and figures within the Application documentation to avoid overlaying multiple datasets on a single drawing which could reduce legibility. In particular, flood extents are illustrated within ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] and [AS-019], and environmental constraints are shown on ES Volume 2, Figure 5.1 – Environmental Constraints and Key Features [APP-062] and

ID	Theme	Representation	Applicant's Response
			the suite of topic-specific figures accompanying the Environmental Statement. The Applicant will continue to engage with the LLFA through the Statement of Common Ground process to address any outstanding concerns regarding the presentation and interpretation of the Works Plan [AS-002] and [AS-003] and its interaction with environmental constraints information.

2.2 South Norfolk Council

Table 2.2 Applicant's Response to South Norfolk Council [\[RR-1795\]](#)

ID	Theme	Representation	Applicant's Response
SNC-001	Planning, Policy Compliance	South Norfolk District Council ("the Council") acknowledges that the proposed development would contribute towards meeting the UK's legally binding commitment to achieve net zero carbon emissions by 2050 and the Government's Clean Energy target of 2030. The Council is broadly supportive of renewable energy schemes in principle which is demonstrated by the array of consented TCPA planning applications across the South Norfolk District. However, in determining this application, the Examining Authority must apply the statutory test under section 104 Planning Act 2008, having regard to the relevant National Policy Statements, including the need to assess whether the identified benefits of the proposal outweigh its adverse impacts. The relevant policy framework for this application comprises the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3), read together, and	The Applicant makes note of South Norfolk Council's support for the need for the Scheme. The Applicants Statement of Need [APP-206] describes how and why the Scheme addresses all relevant aspects of government policy which support the rapid deployment of low carbon electricity generation at scale. The Applicant's position on the Scheme's compliance with NPS EN-1, EN-3, and EN-5 is set out within the Policy Compliance Document [APP-210]. The Applicants position on the overall planning balance, with regard to the NPS is set out within the Planning Statement [APP-209].

ID	Theme	Representation	Applicant's Response
		where relevant EN-5 in respect of associated network infrastructure.	
SNC-002	The Scheme	In this context, the Council has identified substantial harms arising from the development including heritage, landscape, ecological, and amenity impacts. The Council's position is that these harms are significant and must be given appropriate weight within the section 104 planning balance, alongside the national need case. This representation therefore focuses not only on the nature and extent of those impacts, but also on ensuring that the Development Consent Order ("DCO") contains robust, precise and enforceable provisions. The Council has, and will continue to, engage constructively with the applicant, Island Green Power, on detailed drafting. However, points of principle arise where the current drafting introduces uncertainty, excessive flexibility or insufficient control, which could undermine the ability of the decision-maker to be satisfied that the development accords with the relevant NPS and the statutory framework under section 104. These matters are set out below.	Heritage, landscape, ecological, and amenity (noise, air quality, glint and glare) impacts have been assessed within the Environmental Statement. The conclusions of the beneficial and adverse effects of the assessment and significance levels are set out in ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056]. The Statement of Need [APP-206] describes how and why the Scheme addresses all relevant aspects of government policy which support the rapid deployment of low carbon electricity generation at scale, and explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of suitable and available land, suitable irradiation and grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme. The Applicant's position on the planning balance is set out within the Planning Statement [APP-209], which concludes that the mitigation hierarchy has been applied to avoid, reduce, and mitigate effects where possible. The residual significant adverse effects in relation to landscape and visual, BMV quality land are considered to be outweighed by

ID	Theme	Representation	Applicant's Response
			the substantial benefits of the Scheme, including the contribution to Clean Power 2030, and localised benefits to biodiversity, green infrastructure strategy, and employment and training. The Applicant welcomes further engagement with South Norfolk Council on the Draft Development Consent Order [AS-032]. Further detailed responses on the points concerning flexibility and securing mechanisms are provided below.
SNC-003	Legal	The Council wishes to make a relevant representation regarding the proposed DCO. This representation addresses two key areas: 1.3.1 The substantial harms arising from the principle of the project and site-specific impacts; and 1.3.2 The need for robust controls within the DCO to ensure those harms are not exacerbated by excessive flexibility, lack of precision or inadequate timeframes for discharge of requirements.	The Applicant's position is that the Requirements in Schedule 2 of the Draft DCO [AS-032] principally provide robust controls to mitigate against the potential harms of the Scheme as assessed in the Environmental Statement. However, the Applicant makes note of South Norfolk Council's concerns and welcomes further engagement on these matters.
SNC-004	Statement of Need	South Norfolk Council recognises the essential need to generate renewable energy to meet national targets and the	The Applicant makes note of South Norfolk Council's support for the need for the Scheme and concerns over the impacts of the Scheme, which,

ID	Theme	Representation	Applicant's Response
		need for a new National Grid substation to increase capacity within the electricity transmission network to accommodate significant new energy generation from offshore wind farms and consented TCPA planning applications in the district. However, the Council strongly objects to the project and continues to raise concerns about the specific harms the development will cause which are set out below.	as set out at SNC-002, are reported within the Environmental Statement. The Statement of Need [APP-206] describes how and why the Scheme addresses all relevant aspects of government policy which support the rapid deployment of low carbon electricity generation at scale, and explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of suitable and available land, suitable irradiation and grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme.
SNC-005	Planning, Policy Compliance, Potential Main Issues for Examination	Before considering detailed drafting, it is essential to emphasise that the applicant's planning documents identify substantial and significant harms associated with this project. These harms are by virtue of the nature of the development and its location and must be given substantial weight in the planning balance.	Please refer to the Applicant's response at SNC-002.
SNC-006	Landscape and Visual	Key harms include: 4.2.1 Landscape and Visual Effects: Introduction of solar panel equipment, BESS infrastructure, and multiple substations into sensitive rural landscapes, causing permanent change to character and views.	The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines and is robust and appropriate for the assessment of the Scheme. Within Norfolk County Councils Relevant

ID	Theme	Representation	Applicant's Response
			Representation (RR-1451], the Council confirms at para 4.14 the '<i>LVIA follow industry standard guidance, including GLVIA3 (Guidelines for Landscape and Visual Impact Assessment) and relevant technical notes</i>'. The Applicant concludes a range of significant landscape and visual effects during construction these short-term and reversible, resulting from increased activity, vehicle movements, temporary compounds, hedgerow loss, trenching, and temporary PRow closures. During the operational phase long-term significant effects occur as a result of the transition from an agricultural to energy production landscape, with direct loss of features and increased influences from infrastructure. Solar panels alter land cover and affect perceptions of remoteness and tranquillity. However, the Applicant considers that the Green Infrastructure Strategy [AS-005] provides a wide range of proposed landscape and ecological measures, which have been included to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme. The Applicant considers that the Scheme includes a range of reasonable and achievable mitigation measures such as exclusion of development, the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation

ID	Theme	Representation	Applicant's Response
			to mitigate identified effects. Where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme is also included. By Year 15, mitigation planting establishes, reducing effects and enhancing integration. Most landscape and visual receptors experience decreased effects, albeit some remain significant as a result of the long-term presence of new infrastructure. NPS EN-1 states at para 5.10.5 that 'Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape', and at para 5.10.13 that 'All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites'. The Applicant acknowledges that the Scheme would introduce changes to the landscape and visual amenity. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
SNC-007	Cultural Heritage	4.2.2 Heritage Impact: Adverse effects on the setting of multiple designated heritage assets, including Grade II listed buildings, with harm assessed by the applicant as less than substantial and minor adverse.	Assessment of designated heritage assets, including Grade II Listed Buildings, were included within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]. These assessments note

ID	Theme	Representation	Applicant's Response
			that there will be no direct impacts to designated heritage assets, and further states that with the embedded and proposed mitigation in place, there will be negligible impact upon the majority of designated heritage assets re. The only heritage assets where potential impacts have been identified is the Grade II Listed Moulton Farmhouse, where the Scheme will result in a minor adverse impact upon the significance of this asset, which equates to 'less than substantial harm' in terms of the NPSs EN-1 and EN-3, and a 'low level of harm' in NPPF (August 2026). ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056] concludes that no significant residual effects upon cultural heritage assets during the Construction, Operational and Maintenance, and Decommissioning phases of the Scheme.
SNC-008	Ecology and Biodiversity	4.2.3 Ecological Impact: Loss and fragmentation of habitats, with potential impacts on protected species and biodiversity.	Impacts to Ecology and Biodiversity have been avoided by the inclusion of embedded mitigation as set out in Section 8 of the Outline CEMP [APP-196] , and an ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] both of which will be adhered to prior to and during construction. Methods include the establishment of buffer zones between protected sites, priority and important habitats and important ecological features, including ancient trees, woodland, hedgerows, watercourses and ponds;

ID	Theme	Representation	Applicant's Response
			pollution controls and refuelling and chemical storage requirements; a surface water management plan, the employment of an ECoW, and the delivery of toolbox talks. The operation of the Scheme will mitigate impacts to habitats and species through the Outline LEMP [APP-199] which will include enhancement measures for habitats including planting, seeding; better management and monitoring as well as the erection of bat boxes all which will serve to improve habitat networks.
SNC-009	Soils and Agricultural Land	4.2.4 Agricultural Land Loss: Permanent and temporary loss of productive farmland including BMVL, affecting rural economy.	The Council's RR provides no further information regarding this alleged harm. The likely effect of the Scheme on food production and on the wider economy has been assessed as not significant. The area on farms in Norfolk is about 417,633ha (ES Volume 1, Chapter 15 – Soils and Agricultural Land, Table 15.9 [APP-051]). Currently over 41,000ha of arable land (10.8% of agricultural land and 15.1% of all arable land) is not being cropped. Under the Predictive ALC Map for England (Defra, on-line since May 2026) it is the Applicant's estimate (statistical analysis has not been published for authority boundaries) that over 90% of agricultural land across Norfolk is predicted to be BMV, so a high proportion of uncropped land will be BMV. The effect on food production and the related rural economy, with or

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			without continued agricultural production from sheep grazing, is not significant.
SNC-010	Landscape and Visual	4.2.5 Residential Amenity: Noise, visual intrusion and disruption during construction and operation.	The Applicant has prepared a Residential Visual Amenity Assessment [RVAA], as presented in ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148]. The RVAA has been undertaken in accordance with established industry guidance set out in the <i>Landscape Institute [2019] Residential Visual Amenity Assessment [RVAA] Technical Guidance Note 2/19</i>. The Applicant has prepared assessments of noise during construction and vibration. These are presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The assessments have been undertaken in accordance with established industry guidance set out in BS 5228-1:2009+A1:2014 and BS 4142:2014+A1:2019.
SNC-011	Planning, Policy Compliance, Potential Main Issues for Examination	4.3 These harms are not minor or incidental. They represent a degree of harm that arises from the fundamental nature of the project and its route selection. They must be accorded very significant weight in the overall planning balance. These are addressed in more detail in Part 2. For the most part the assessment of harms in the application documents is accepted and adopted. The reason for highlighting the	The significant beneficial and adverse effects identified by the Environmental Impact Assessment have been reported in ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056]. These effects have informed the Applicant's conclusions on the overall planning balance, as reported within the Planning Statement [APP-209].

ID	Theme	Representation	Applicant's Response
		harms is to ensure that the very significant harms of the project are properly acknowledged and weighed in the balance. The harms identified in the application documents are substantial and significant. They must be given very significant weight in the planning balance. The DCO must include robust controls to ensure these harms are not compounded by inadequate drafting or procedural weaknesses.	The Draft DCO [AS-032] has been produced to ensure that the environmental mitigation identified by the ES chapters and written into the management plans is secured by the appropriate DCO Requirements, as set out in Schedule 2. The Applicant welcomes further engagement on the Draft DCO [AS-032] .
SNC-012	Cultural Heritage and Archaeology	5.1 Under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, decision-makers must give special regard to the desirability of preserving listed buildings and their settings. This duty establishes a statutory presumption in favour of preservation, which must be given considerable importance and weight. The Council agrees that proposed development would result in less than substantial harm to the significance of the heritage assets affected. 5.2 Paragraph 212 of the National Planning Policy Framework (NPPF) requires that great weight be given to the asset's conservation, irrespective of the level of harm. Paragraph 213 NPPF further requires that this harm must be weighed against the public benefits of the proposal. In addition, paragraph 215	This is noted by the Applicant. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies. The NPPF does not contain specific policies for NSIP such as the Scheme. The Scheme will primarily be determined in accordance with the national policy statements (namely NPSs EN-1, EN-3 and EN-5). However, the NPPF may still be considered by the Secretary of State to the extent it is considered important and relevant to the decision. Notably a new NPPF was published in August 2026 and the term 'less than substantial harm' has been removed from the new policy, with the requirement to now consider whether the impact on a designated heritage asset would result in a

ID	Theme	Representation	Applicant's Response
		provides that this harm must be weighed against the public benefits of the proposal, including securing its optimum viable use. While the harm identified is less than substantial, it nevertheless should carry great weight in the decision-making process, as required by Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.	positive effect; no effect; harm; substantial harm; or total loss. The Applicant will provide an update in respect of the new NPPF at Deadline 1.
SNC-013	Cultural Heritage and Archaeology	5.3 The approach to assessing the impact of the proposals on affected heritage assets, as set out in the Environmental Statement, is generally supported. However, it should be emphasised that Grade II listed heritage assets are designated for their national significance, and policy requires that "every effort should be made to preserve them". Accordingly, it is incorrect to describe such assets as being of only regional value as stated in Table 10-3 of the Cultural Heritage Chapter [APP-046].	The Applicant notes that the sensitivity criteria used within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] were agreed with SNC at PEIR stage. The Applicant maintains that it is accepted across the industry (including on the approved West Burton and Cottam Solar Schemes) that designated heritage assets of Grade II status are generally of regional significance, with higher levels of sensitivity assigned to Grade II*, Grade I, Scheduled Monuments and World Heritage Sites. Having said this, professional judgement has been used to assess the sensitivity of each heritage asset on an individual basis, and regional variations and individual qualities have been taken into account, where applicable. No Grade II designated heritage assets have been identified as being of over regional sensitivity.

ID	Theme	Representation	Applicant's Response
SNC-014	Cultural Heritage and Archaeology	5.4 It is agreed that no designated heritage assets will be directly affected, although the proposals will affect the setting of various heritage assets and the way in which the setting contributes to appreciating and experiencing the significance of those assets. The Council disagrees as to how much the proposals affect the setting of some heritage assets as set out in more detail below.	This is noted by the Applicant and addressed in detail below.
SNC-015		5.5 It is accepted that Grade II heritage assets will generally have a medium level of sensitivity. However, sensitivity also depends on the specific nature and character of the asset, and its significance may be affected in each case. For example, the impact may be greater where solar panels are in close proximity and affect key views from and to principal elevations, as with Moulton Farmhouse (1373270) and Hillside House (1050216). By contrast, where views from and to the asset in the direction of the solar panels make less of a contribution to its overall significance, the asset is less sensitive to changes to its setting. 5.6 The impact on heritage assets has been described as low adverse harm, on the	The Applicant notes that low adverse impact is defined as: - Slight loss of the significance of a heritage asset. This could include the removal of fabric that forms part of the heritage asset, but that is not integral to its significance (e.g. the demolition of later extensions/additions of little intrinsic value). Some harm to the heritage asset's setting, but not to a degree that it would materially compromise the significance of the heritage asset. Perceivable level of harm, but insubstantial relative to the overall interest of the heritage asset. Medium adverse impact is defined as: - Partial loss or alteration of the significance of a heritage asset. Considerable harm to a

ID	Theme	Representation	Applicant's Response
		basis that only limited harm to the setting would occur and that the asset can still be appreciated from other aspects of their setting without being affected. However, given the markedly different character of the proposals when compared with existing local character, it is considered that the overall scale of effect should be assessed as moderate rather than minor, as set out in Table 10-5 [APP-046]. This constitutes a significant effect, as the setting would not be preserved. The harmful impacts on the various assets, as outlined below, should therefore be taken into account in the determination.	heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost. This equates to less than substantial harm in terms of the NPSs EN-1 and EN-3 and a 'low level of harm' in NPPF (2026) terms. In assessing harm, policy and guidance is clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. Although the presence of solar PV arrays within parts of the wider settings of some designated heritage assets will constitute a change of land use, this is not considered to be of such significant effect as to materially affect or considerably devalue the significance of any identified heritage asset. Embedded mitigation within the Scheme including setbacks, removal of fields and landscaping proposals has been designed to minimise adverse effects on the settings of designated heritage assets and the demonstration of setting through views. Details of this are included in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 – APP-168].

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SNC-016	Cultural Heritage and Archaeology	5.7 It should be noted that the experience and appreciation of heritage assets within their setting is not dependant on public access. However, the presence of footpaths can enable a greater number of people to experience and appreciate the asset, particularly in terms of views. In many cases, these footpaths and bridleways are themselves historic routes and connections between settlements that were not formalised as roads, and in some instances remain as trackways defined by long-established hedgerows to each side. Examples include Hundred Lane (RB19) in Great Moulton and the initial section of the path from the small cluster of buildings between Saxlingham Nethergate and Saxlingham Green. 5.8 Although these historic paths and routes have not been identified as non-designated heritage assets in accordance with paragraph 216 NPPF, they together with dispersed designated heritage assets, which are often located in isolated positions away from settlements, form important components of the historic agricultural landscape experienced when moving through the area. As such the project may have a detrimental cumulative impact. This	No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including those of heritage assets, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were identified.

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		matter will be considered in further detail in the Local Impact Report.	
SNC-017		5.9 The design, type and characteristics of the proposed solar panels are of concern. Owing to their appearance, the solar panels and substations will introduce an incongruous, alien and industrial character to the rural landscape. At a height of up to 4.5m, the proposed rotating solar panels would be particularly visible, and their movement and changing orientation would increase their prominence within the 6 setting of the heritage assets. They would also be significantly taller than a typically maintained historic field boundary hedge, further heightening their visual impact.	The Applicant has sought to minimise adverse effects on the landscape and its features, and the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape features to support landscape integrating and visual screening of the Scheme. The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines and is robust and appropriate for the assessment of the Scheme. The assessment considers the maximum parameters and a worst-case scenario for the Scheme. This includes solar panels at a maximum height of 4.5m, however it should be acknowledged that this maximum height will only be experienced at set intervals during the day and will be at reduced heights for the majority of a 24-hour period. The Outline LEMP [APP-199] commits to establishing hedgerows to 3m in height to support visual screening.
SNC-018	Design Principles	5.10 The height and design of the 4.5m panels limit the effectiveness of the	ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] , considers the landscape and

ID	Theme	Representation	Applicant's Response
	Landscape and Visual	proposed landscape mitigation measures, such as hedge planting and hedge reinforcement. As a result, tree planting has been proposed in some areas. However, this could have adverse effects including loss of important views and the introduction of a sense of enclosure within what is currently an open landscape. Also, reliance on tree planting for screening due to the height of the panels, would extend the time required for vegetation to mature and provide effective mitigation. 5.11 There is limited detail regarding the extent to which tree planting would provide effective screening beyond the indication that native deciduous species are proposed. During winter months, when there is less foliage, such planting would offer less effective screening unless established as denser tree belts. While thicker tree planting plantation may better reflect historic landscape features such as plantations and coppices, the indicative masterplan does not clearly define the proposed density of planting or how it will be managed in certain areas. Also, the proposed tree planting will represent a long term and permanent change. It is therefore important its design responds appropriately to the local	visual matters associated with the Scheme including the effectiveness of deciduous planting, both with regard to the time required to establish and reduced screening during the winter months. The Applicant considers that this embedded mitigation has been appropriately reflected in the assessment of effects. Where proposed planting has the potential to influence landscape character, this has been assessed within ES Volume 3, Appendix 7.4 – Landscape Assessment Tables [APP-121]. The Applicant considers the proposed landscape measures which include woodland, hedgerows, and trees proposed within the Outline LEMP [APP-199] have been carefully sited with regard to existing characteristic landscape features. Furthermore, embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation, alongside the incorporation of landscape proposals. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. The Outline LEMP includes details on planting proposals for each landscape typology including planting densities and outline management regimes. These details will be secured through the LEMP created prior to implementation of the

ID	Theme	Representation	Applicant's Response
		landscape character, and does not, in itself, give rise to harm, for example by creating an increased sense of enclosure or enclosure by resulting in the more permanent loss of important views. Para 40 of Historic England Setting Guidance Note states that "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."	Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032] .
SNC-019	Design Principles Landscape and Visual	5.12 Within areas close to designated heritage assets, a secured design parameter within the DCO should require the use of lower-height fixed panels at 3 m to minimise harm. This would reduce visual intrusion and enable more effective screening by native hedgerow planting, avoiding the need for extensive tree planting. The use of 4.5 m high panels should be restricted to locations where they would have the least impact, and where any screening through tree planting would not introduce additional adverse effects on the setting of heritage assets. In sensitive locations, including the setting of heritage assets and where views to and from an asset may be materially affected, the design	The Applicant considers the Scheme includes a range of embedded mitigation measures to reduce visual intrusion. This includes the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation, alongside the incorporation of landscape proposals. Proposed landscape measures include hedgerows, woodland, and trees within the Outline LEMP [APP-199] . These have been carefully sited with regard to existing characteristic landscape features. For example, proposed tree features (linear tree belt and woodland) have been located where trees form part of the existing landscape character baseline, and these features

ID	Theme	Representation	Applicant's Response
		parameters should require lower-height panels supported by hedgerow screening and intermittent hedgerow trees.	follow existing field boundary and landscape pattern to aid integration of the Scheme. Collectively the approach and measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. At Site 8B this approach is evident where solar development has been excluded on rising landform to the north and west with landscape measures proposed to reinforce existing tree features and screen the remaining part of the Site which is proposed for solar development.
SNC-020	Cultural Heritage and Archaeology	5.13 Assets notably impacted by the project during operation are: 5.13.1 Moulton Farmhouse, Barn Cottages, Hillside House, Cedar House, Wood Farmhouse, Grove Farmhouse, Hill House, and Hill Cottages (Grade II) 5.13.2 Low Farm (Non-Designated Heritage Asset)	This is noted by the Applicant and addressed in detail below.
SNC-021	Cultural Heritage	Site Specific Heritage Concerns: Site 1B 5.14 The Council is concerned at the impact of the proposal on the setting of Grade II Moulton Farmhouse (1373270). The front elevation of the heritage asset faces west and is visible from FP13 at its west end, with	The Applicant notes that it has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced. It stands to reason, therefore, that less than substantial harm, in terms of the NPSs EN-1

ID	Theme	Representation	Applicant's Response
		its prominent vernacular thatched roof contributing positively to the surrounding rural character in views. Although an agricultural field remains to the west of the asset, the site would be located only 150m from the listed building. There is some existing hedge and tree planting that already provides a degree of screening, and this is proposed to be supplemented. However, this would not be sufficient to effectively screen the solar panels in views if the panels are 4.5m in height. Due to the visually incongruous and industrial nature of the panels, the level of harm should be considered moderately adverse and therefore significant, equating to a low to medium level of less than substantial harm.	and EN-3, covers a very broad spectrum. To be towards the upper end of that spectrum would require something approaching substantial harm and even to fall within the middle of that spectrum would require a high level of harm. In assessing harm, policy and guidance is also clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. The proposals will result in a loss of a single vista of Moulton Farmhouse from PRoW FP13, which transects Sub-Site 1B, due to the presence of the Project Substation here and associated screening proposals. This view is considered to be important in illustrating the Listed Building's architectural interest and aesthetic value within its countryside setting, and was therefore concluded within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] that this would cause less than substantial harm at the lowest end of the scale in terms of the NPSs EN-1 and EN-3, and a 'low-level of harm' in NPPF (August 2026) terms.
SNC-022	Landscape and Visual	5.15 To reduce the level of harm and more effectively mitigate the impact, it is suggested that the field immediately west of the proposal is also omitted. This would allow uninterrupted views toward Moulton Farmhouse from FP13 and enable a more extensive part of the asset's setting to be	The Applicant does not consider that the removal of the field to the west of Moulton Farmhouse would change the level or magnitude of impact. Under the proposals, solar PV arrays are set back from the property by 150m and a new linear tree belt proposed to reinforce an existing treed field boundary. As a result, following establishment of

ID	Theme	Representation	Applicant's Response
		preserved. It would also reduce the impact on the north side of Hundred Lane (RB19), which would otherwise feel more enclosed and experience a change to its character as a result of the additional landscape planting proposed to either side. This approach would also reduce the impact to a low level of less than substantial harm.	landscape measures views may be partially visible from the Listed Building, but this visibility would not be at a detriment to the significance of the heritage asset as a whole. Users of PRow FP13 travelling east already experience varying degrees of filtering of views towards Moulton Farmhouse as a result of intervening vegetation along the PRow and on field boundaries in the wider landscape. The visual amenity of users of Hundred Lane (RB19) is variable as a result of the dense tree belt present along this route to either side but is typically enclosed in nature. The Scheme includes a set back from Hundred Lane of ~50m, to provide separation, and for additional tree planting. The Applicant agrees that this additional tree planting identified as S1b-5b on the Green Infrastructure Strategy [AS-005] would provide visual screening of the Scheme to the north and reinforce this sense of enclosure, however this enclosure is an existing characteristic of this section of Hundred Lane.
SNC-023	Landscape and Visual	5.16 There are currently views across the field toward the BESS and 400kV substation, located approximately 280m away from Barn Cottages (1050010). A 4m high solid fence is proposed for noise mitigation. It is unclear whether this is also	The Applicant notes that the proposed 4m high solid fence for noise mitigation will only enclose the BESS and not the adjacent 400kV substation. The fence will be externally bounded by existing and proposed planting.

ID	Theme	Representation	Applicant's Response
		intended to enclose the 400kV substation to the south. If so, such a fence would represent a very unusual and incongruous feature within the landscape. Due to the distance and the presence of intervening buildings that limit intervisibility, it is agreed that the proposal would result in a minor adverse effect and lower level of harm	
SNC-024	Landscape and Visual	5.17 To ensure that the level of harm to the heritage asset is minimised, it is advised that the landscape planting is of sufficient depth to form a substantial and dense tree belt to screen the acoustic fence. As the planting would be located to the south of the substation and would not affect sunlight to the solar panels, it could comprise a particularly dense area of tree cover, connecting to the existing wooded coppice to the west. The proposed tree planting would also be set at a sufficient distance from the heritage asset to avoid creating a harmful sense of enclosure.	A 15m wide tree belt is proposed (BS-1) as identified on the Green Infrastructure Strategy [AS-005] to the southern boundary of the 400kv substation (appropriately offset from the substation). This has been offset 200m from the heritage asset. The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032]. An additional commitment will be added to Outline LEMP [APP-199] at Deadline 1 to increase the planting density at this location recognising the comment from the consultee.

ID	Theme	Representation	Applicant's Response
			The Applicant notes views to the north of Barn Cottages are not defined by their openness and are rather limited and channelled by existing vegetation. The Applicant's view is that landscaping proposals along the southern edge of the 400kv Substation will likely be sufficiently dense to effectively screen any visible elements of the Substation once matured.
SNC-025	Landscape and Visual	5.18 Overall, the Council considers that, without the proposed mitigation changes and strengthened landscape strategy set out above, the development would result in a moderate and therefore significant level of harm to the setting of Moulton Farmhouse 8 and associated heritage assets; such harm must be afforded considerable weight in the planning balance and requires further design amendments to ensure impacts are appropriately avoided and reduced.	The moderate level of harm stated here has been contradicted by comment SNC-021 where the Consultee stated that the Scheme would result in a low to medium level of less than substantial harm. Substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced. It is not considered by the Applicant that partial views of Solar PV Arrays in the field to the west of the listed building would result in an impact so adverse that its significance would be vitiated and therefore, disagrees with the ascribed level of harm.
SNC-026	Cultural Heritage	Site Specific Heritage Concerns: Site 2A 5.19 The proximity of solar panels to Grade II Hillside House (1050216), originally constructed as a workhouse, is a concern.	The Applicant notes that Historic England refers to this asset as Hill House (NHLE 1050216). Due to the nature of the comments, SNC-026 and SNC-027 have been answered together in SNC-027 below.

ID	Theme	Representation	Applicant's Response
		The asset has a strong historic connection to the surrounding agricultural landscape of the Depwade Hundred which it served, with many of the rural poor very likely to have been working the land as labourers, this being the principal employment in rural areas during the 19th Century. It is also likely that inmates from the workhouse were hired to work in the surrounding fields. It is therefore erroneous for the Cultural Heritage chapter to suggest that the asset was only historically connected to Pulham Market, as it was designed to house 400 inmates from a large surrounding area.	
SNC-027	Cultural Heritage	5.20 The former workhouse is a large and imposing three-storey building designed in a classical style, with its principal elevation facing west. The central section contained the boardroom, porters lodge and offices, as well as the chapel to the left side. It was a designed to be a highly visible and prominent building on the turnpike road, asserting a strong sense of authority over the surrounding area. The building would have held significant meaning to those working in the surrounding fields.	The Applicant agrees that the Grade II Listed Hill House occupies a prominent frontage on the eastern side of Ipswich Road. The Applicant disagrees that 'The close proximity of the proposed screening would create a sense of enclosure for views from the asset over agricultural land to the west, and also detrimentally affect views of the asset from the west from footpaths BR9 and FP8. Rather than screening the solar farm, the planting would screen the heritage asset from views and restrict views from it. The proposal would result in a moderate adverse level of effect and would be considered significant, as it alters the setting of the principal west-facing elevation.'

ID	Theme	Representation	Applicant's Response
		5.21 The close proximity of the proposed screening would create a sense of enclosure for views from the asset over agricultural land to the west, and also detrimentally affect views of the asset from the west from footpaths BR9 and FP8. Rather than screening the solar farm, the planting would screen the heritage asset from views and restrict views from it. The proposal would result in a moderate adverse level of effect and would be considered significant, as it alters the setting of the principal west-facing elevation.	Hill House is set back from Ipswich Road to the west, with its immediate setting including Cherry Lane Garden Centre, which is situated south-east of the building, and associated car parks to the south and south-east of Hill House. Further car parks are present within the grounds of the former workhouse, and modern signage is present to the west, along Ipswich Road. Its wider setting comprises agricultural land. Ipswich Road runs roughly north/south and separates Hill House from the Order Limits to the west. ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] notes that Sub-Site 2A forms part of the rural surrounding of Hill House. The south-eastern part of Sub-Site 2A already possesses a hedgerow of varying maturity, with the hedgerow west of Hill House fairly established, though it is acknowledged that there are gaps in this coverage which allows for intervisibility between Hill House and this field within Sub-Site 2A. Within the field immediately opposite Hill House, a 20m set back has been established along the entire Ipswich Road boundary, with a native broadleaf woodland proposed behind the existing hedgerow. The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the LEMP created prior to implementation of the

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			Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032]. It is not considered that the implementation of landscape mitigation within this area will result in the enclosure for views from the asset over agricultural land to the west. Hill House is set back c. 25m from Ipswich Road, and this set back will still preserve the sense of openness to the west. The Applicant notes that while Bridleway BR9 extends along the western boundary of Sub-Site 2A, c. 700m west of Hill House, FP8 is situated c. 1.3km south-east of Hill House and is not considered relevant to this assessment. The Applicant is assuming the Consultee means to reference either FP10, which branches off of BR9, west of Sub-Site 2A. ES Volume 3, Appendix 7.6 – Figure 7.6.3 Visualisations – Site 2 [APP-139] shows the visualisations of the site from the north-western corner of the Hill House complex, as well as views towards Hill House from BR9. It is acknowledged that while the presence of Solar PV Panels within Sub-Site 2A will entirely impede any views of the western elevation of Hill House from BR9, these views already exist at quite a distance and are partially screened by the vegetation west

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			of Ipswich Road, as well as along the intervening fields. It is further noted that primary significance of this asset is vested in its architectural and historic interests, largely due to its overall functional, institutional design, as well as its contribution to the social history of the area. While the Scheme will introduce Solar PV Panels within its agricultural setting, these elements will not result in any harm to this significance. The building will still be a prominent building east of Ipswich Road, as well as from FP6 to the north of the former workhouse, and the Scheme will not result in any impact to the ability to appreciate this structure.
SNC-028	Landscape and Visual	5.22 It is therefore advised that, in order to provide more effective mitigation and to reduce the level of harm, the field immediately to the west of the asset should remain in agricultural use as a visual break, preserving part of the asset's setting to the west. Furthermore, the solar panels should be limited to 3m in height to reduce their visual impact and allow them to be screened by supplemented hedgerows, rather than extensive tree planting.	The Applicant does not consider that Solar PV Panels need to be removed from the field within Sub-Site 2A immediately west of Hill House, nor does the Applicant consider that the reduction of Solar PV Panels within Sub-Site 2A from 4.5m to 3m in height is required. From BR9, views towards Hill House are at quite a distance, and are partially screened by the vegetation west of Ipswich Road, as well as along the intervening fields. ES Volume 3, Appendix 7.6 – Figure 7.6.3 Visualisations – Site 2 [APP-139] illustrates that the Solar PV Panels within Sub-Site 2A will entirely impede views of Hill House from BR9, and it is not

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			considered that a reduction in panel height will allow for views of Hill House from this location.
SNC-029	Cultural Heritage	5.23 Overall, the Council considers that, in the absence of the mitigation measures identified and appropriate design controls, the proposal would result in a moderate and therefore significant level of harm to the setting of Hillside House, and this harm must be afforded considerable weight in the planning balance in accordance with statutory duties and national policy.	The Applicant notes that partial visibility of Solar PV arrays in a small section of the Listed Building's setting, at least partially screened by existing hedgerows and trees, would not be such that the significance of the Grade II Listed Hill House would be vitiated, and it is for this reason that the Applicant disagrees with the Consultee's ascription of harm.
SNC-030	Cultural Heritage	Site Specific Heritage Concerns: Site 4 5.24 It is agreed that given the distances involved and the ability to appreciate the heritage asset from other aspects of their setting, the scale of the effect will be relatively minor and at the lower end of less than substantial harm. However, the nature of the solar panels means that the proposals will be very imposing and incongruous within wider landscaping setting of the assets, in particular Cedar House (1304177). To further reduce impact and harm, it is advised that, in this more sensitive area, the height of the solar panels should be also limited to no more than 3m.	The Applicant notes the Scheme extends to c. 70m east of the Grade II Listed 'The Cedars' (NHLE 1304177) at their nearest points. As part of the initial design process, solar PV Panels have been removed from those areas of Sub-Site 4B to the north-east, east and south-east, with much of these areas to be retained as grassland. To the north-east, a new linear native broadleaf woodland will be established, which will be a continuation of the established veteran trees already present to the north of The Cedars. To the north-west of The Cedars, views of Solar PV Panels within Sub-Site 4A will be oblique and beyond the busy A140 (Norwich Road). They will also be set at a considerable distance and will constitute a small part of wider vistas from the upper storeys of The Cedars. Whilst the slight

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		5.25 Overall, while the level of harm is assessed as low and at the lower end of less than substantial, the Council considers that further mitigation through reduced panel height is necessary to ensure that the setting of Cedar House is appropriately preserved and that harm is minimised in accordance with national policy and statutory duties.	visibility of Solar PV Panels within this Sub-Site is acknowledged by the Applicant, it is considered that the intervisibility due to the slight change in its setting will not result in any harm to the significance of The Cedars (ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]). A reduction in height from 4.5m to 3m would result in the same conclusion of significance, which is already considered to be very minor and not harmful to the significance of The Cedars.
SNC-031	Cultural Heritage	Site Specific Heritage Concerns: Site 7C 5.26 It is acknowledged that two Grade II heritage assets namely, Wood Farmhouse (1373238) and Grove Farmhouse (1050330), have a relationship, in terms of their setting, with the proposed area to their north. Wood Farmhouse is located further away from the site and at a lower elevation, such that only its roof is visible from footpath FP2 to the north-east. Grove Farmhouse is orientated so that its side gable faces north, and views from the footpath are also affected by intervening curtilage farm buildings. The two assets are, however,	The Applicant notes that the Scheme extends up to the northern boundary of both the Grade II Grove Farmhouse (NHLE 1050330) and Wood Farmhouse (NHLE 1373238). The present landscape surrounding both heritage assets is not defined by its openness; rather it is bordered by ancient woodlands to the east and west, and further enclosed by mature tall hedgerows and trees across the field boundaries of the surrounding areas. Longer range views of the buildings are screened by the rising topography to the north, with views of both Listed Buildings from within Sub-Site 7C highlighting the structures 'nestling' within the surrounding landscape. The rooflines of both buildings are the primary features in these longer-range vistas. These views of the buildings from

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		closely related to their wider landscape setting as traditional rural farm buildings within an agricultural context. 5.27 The proposal provides a setback from the assets, with landscape tree planting comprising native broadleaf woodland and linear tree belts intended to screen the panels and mitigate harm. However, this would create a sense of enclosure to the north, contrasting with the currently relatively open farmed landscape character. While the landscaping measures would be permanent and designed to screen taller 4.5m high solar panels, a preferable approach would be to use natural hedgerow planting with 3m high solar panels, thereby preserving the sense of rural agricultural openness that currently exists to the north of the assets. 5.28 Overall, while the level of harm may be limited, the Council considers that the current approach to mitigation introduces its own low adverse effects, and that a revised design utilising lower panel heights and hedgerow planting is necessary to preserve the openness and character of the agricultural setting and to minimise harm to	within Sub-Site 7C south give a better sense of openness, with views tunnelled between the two areas of ancient woodland. These views south would not be affected by the Scheme. As part of the initial design process, Solar PV Panels have been removed from those areas of Sub-Site 7C to the north of these heritage assets, with the land to the north of Wood Farmhouse to be retained as agricultural land and utilised for as skylark mitigation, whilst the land to the north and west of Grove Farmhouse to be retained as open agricultural land. These spaces will be bounded to the north by new native broadleaf woodland and linear tree belts. This substantial set-back with both Wood Farmhouse and Grove Farmhouse is considered to retain a sufficient buffer of open land to preserve what limited, existing sense of openness can be experienced from these assets, with the proposed woodland and tree belts to the north not considered to impose or dominate this sense of openness. The Applicant disagrees that a revised design scheme is required to minimise impacts to Wood Farmhouse and Grove Farmhouse. At present, it is considered that the established setbacks between both heritage assets and the developable area is considered sufficient to ensure that the Solar PV Panels will not be overly prominent within any

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		the heritage assets in accordance with national policy and statutory duties.	views from or of either asset. The reduction of Solar PV Panel height to 3m, as well as an associated reduced screening height, would not have any meaningful effect on the sense of openness/enclosure of the surrounding landscape, nor would it allow for a greater ability to understand the setting of either Farmhouse.
SNC-032	Cultural Heritage	Site Specific Heritage Concerns: Site 7D 5.29 There is an important cluster of historic buildings to the north of the site, including Hill House (1152265) and Hill Cottages (1373062), and Low Farm, which although unlisted, is of some age, appearing on earlier maps and featuring a steep roof that was likely originally thatched. This forms a historic grouping of rural dwellings, where views over surrounding landscape are important, as is the preserved farmland around the cluster which provides a visual break between the Saxlingham Nethergate and Saxlingham Green Conservation Areas. There is also a historic trackway, now forming footpath FP13, running from the cluster to the south-west.	The Scheme includes a setback of ~100m from the group of properties on Church Hill. The geophysical survey (ES Volume 3, Appendix 10.3 - Archaeological Geophysical Survey Report [AS-022]) identified numerous linear, rectilinear and curvilinear anomalies possibly representative of a multi-period settlement within the northern part of Sub-Site 7D, immediately south of Church Hill. As such, a setback was established within this part of Sub-Site 7D for the protection of these likely archaeological remains. Within this set back a range of landscape measures are proposed as identified on the Green Infrastructure Strategy [AS-005]. Firstly, the majority of the land is proposed to be converted to a wildflower grassland as a biodiversity net gain benefit. A new hedgerow field boundary / tree belt (S7d-4) is proposed to the south of the set back / grassland area which ties up to existing field boundaries to the east. Furthermore, additional tree planting within the road side hedge line is

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		5.30 The solar panel installations have the potential to be visible when passing through the landscape from the north, with direct views towards the proposal site before the road bends to the east, due to the relatively open character of the landscape. The masterplan shows an area of mitigation to the south of the buildings although. However, it is unclear what this will comprise and whether the intention is for it to be native broadleaf woodland. Dense tree planting could result in its own visual harm by creating excessive enclosure in an area that is currently characterised by more open views. It is therefore recommended that the field to the south should remain undeveloped to provide a more spacious rural setting and that the existing tree plantation visible to the south-east is extended to create a visual buffer with ecological benefits, helping to preserve the wider setting of the heritage assets. 5.31 Overall, the Council considers that, without the proposed refinements to avoid overenclosure and retain openness to the south, the development would result in low adverse harm and the low end of less than	proposed (S7d-7). The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the LEMP created prior to the implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 of the Draft DCO [AS-032]. The Applicant disagrees with the consultee in that the Scheme would result in low adverse harm and the low end of less than substantial harm to the identified heritage assets. The retention of the northern part of Sub-Site 7D as open fields would maintain the rural setting south of the group of heritage assets along Church Hill. Collectively, the mitigation measures would provide visual screening and filtering of views towards the Scheme in a sympathetic way which avoids introducing new dense woodland planting in proximity to the heritage assets and would further retain the sense of openness when travelling along Church Hill between Saxlingham Nethergate and Saxlingham Green Conservation Areas. While it is accepted that lanes, tracks and footpaths in general contribute to the overall historic landscape character of an area, the assessment has not identified any footpaths which

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		substantial harm to the setting of this historic group and the visual and functional relationship between the two conservation areas. Such harm should be afforded appropriate weight in the planning balance in accordance with national policy and statutory duties.	have any particular heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including FP13, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and mitigated where potential impacts were identified. The Applicant maintains that with the embedded and proposed mitigation measures in place, there will be no harm to the identified heritage assets.
SNC-033	Cultural Heritage	Site Specific Heritage Concerns: Site 9 5.32 The rural landscape and agricultural setting are important to the village, parts of which are designated as a conservation area. The site would not be visible from the street to the north within the High Green Conservation Area. Properties along High Green, including the heritage assets have a dense tree cover to the rear, although there may be some visibility from the gardens at the west end. At current the proposals are for tree planting and infilling of gaps within the existing hedgerow. However, within the landscape surrounding Brooke, tree plantations are a characteristic feature of the wider rural setting of the conservation area. It is therefore recommended that the buffer	The Applicant is assuming the Consultee is here referring to the Brooke and Kirstead Conservation Area, which lies to the north and east of Sub-Site 9. The significance of the Conservation Area is vested in its preserved historic character as a rural village. The interrelationship between its historic buildings and the development of the village from medieval times onwards is the main contribution to both this asset's significance and setting. Within the conservation area itself, a sense of enclosure is experienced with houses fronting onto the roads lined with mature vegetation, which provides an inward facing atmosphere and strong sense of tranquillity. Tree belts exist along the settlement edges, with views of the countryside from within the village itself, and vice versa, very limited.

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		strip to the north side of the proposed solar panels is of a sufficient depth and density to provide effective screening and to integrate with existing landscape characteristics. 5.33 Overall, the Council considers that, subject to the provision of a sufficient and appropriately designed landscape buffer, the development has the potential to minimise impacts on the setting of the conservation area; however, this mitigation must be robustly secured to ensure that the rural character and visual relationship of the area are preserved in accordance with national policy and statutory duties. 5.34 Planning Balance 5.34.1 Impacts to heritage assets must be given substantial weight in the planning balance. Even where the magnitude of impact is categorised as low, noticeable changes to the setting can justify classification as moderate adverse harm to the setting of listed buildings. Such effects represent a meaningful level of harm to heritage assets and require robust mitigation and clearly defined DCO requirements to ensure impacts are not exacerbated during detailed design.	Site 9 is largely screened from the Conservation Area due to the presence of the mature vegetation surrounding much of the village; however, it is acknowledged that views between Site 9 and the cricket club exist, with this complex situated to the south of the main core of the village, beyond the southern treeline. However, this intervisibility is not considered to be a significant viewpoint within the conservation area. The High Green area of the Brooke & Kirstead Conservation Area (at its south-westernmost corner) extends to within c. 130m north of Site 9, at their nearest points. As part of the design process, the south-western approach into the conservation area was considered, as when travelling north into the High Green area, these views could include glimpsed views of the western part of Site within their vistas. As such, Solar PV Panels were entirely removed from the western half of Site 9 prior to the submission of the application, with these areas to be retained as agricultural land. The removal of Solar PV Panels from the western half of Site 9 will also help retain the rural backdrop for the westernmost part of the conservation area, with this rural backdrop noted as being an important landscape gap. A 20m wide tree belt is currently proposed (S9-1) as identified on the Green Infrastructure

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			Strategy [AS-005] to the northern boundary of the Site. The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities. These details will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032]. An additional commitment will be added to the Outline LEMP [APP-199] at Deadline 1 to increase the planting density at this location recognising the comment from the consultee. Several site visits have been conducted in different seasons and did not identify any intervisibility between Site 9 and the properties on High Green. The majority of Site 9 will be retained as open land and landscape screening along the northern boundary of fields that will not be part of the built parameters of the Scheme could be detrimental by closing off what little views there are of the countryside to the south, which is listed as an important part of the Conservation Area's setting.
SNC-034	Landscape and Visual	Chapter 7 of the Environmental Statement provides a comprehensive assessment of potential landscape and visual effects.	The Applicant notes this comment that the assessment undertaken is comprehensive, and

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		Given the scale and nature of the project, it is unsurprising that the assessment concludes there will be residual moderate significant adverse effects on landscape character and visual amenity at multiple locations from which the application site is visible. The Council acknowledges that, within South Norfolk, there are no alternative sites that would avoid such effects.	that within South Norfolk no alternative sites would avoid the reported residual effects. The Applicant considers that LVIA presented in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines and is robust and appropriate for the assessment of the Scheme.
SNC-035	Landscape and Visual	The LVIA also concludes that there will be a major significant adverse effect on the Tas Tributary Farmland and Great Moulton Plateau Farmland landscape character areas, as these are both sensitive and generally open in nature. The BESS and substations will appear as industrial and incongruous features within the landscape and are likely to be visible due to the open nature of the countryside in these areas. As such, they will cause detrimental harm to the landscape setting.	The Applicant does not agree with this interpretation. The likely significant landscape effects during the construction phase, Year 1 operation, Year 15 operation, and decommissioning phase are reported in ES Volume 1, Chapter 7 Landscape and Visual [APP-043]. This concludes: • Effects on LCA B1 Tas Tributary Farmland and LCA E2 Great Moulton Plateau Farmland are assessed as moderate adverse [significant] at both Year 1 and Year 15. • At Site 1 [which represents a small portion of LCA Great Moulton Plateau Farmland], landscape character and visual effects are assessed as major adverse [significant] at both Year 1 and Year 15. This therefore represents a localised effect of major

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			adverse reducing to moderate effect for the wider LCA. At Site 8 [which represents a very small part of LCA Tas Tributary Farmland], effects are assessed as major adverse [significant] at Year 1, reducing to moderate adverse [significant] by Year 15 as mitigation establishes. This therefore represents a localised effect of major adverse reducing to moderate effect for the wider LCA. The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] has been undertaken in accordance with established good practice and is robust and appropriate for the assessment of the Scheme. A worst-case approach has been applied, and the assessment provides a reliable basis for identifying likely significant effects including the presence of the substations and BESS. The Outline LEMP [APP-199] provides details on the embedded mitigation measures and landscape proposals which are included alongside commitments to the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the

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			surrounding context and reduce visibility of the Scheme.
SNC-036	Arboriculture	6.3 The Arboricultural Impact Assessment (AIA) [APP-150] notes arboricultural surveys undertaken by two separate companies between 2024 and 2026. The Council request Island Green Power confirm the methodology used to identify veteran trees to demonstrate consistency of approach between the two contractors, and to provide supporting evidence of these assessments.	The Applicant confirms the methodology used by two companies to identify veteran trees is consistent. The veteran trees are identified in the survey by following the guidelines in BS5837:2012, RAVEN2 and Ancient Tree Guide from Woodland Trust, which comprise of age, size, and condition assessments of primary and secondary features of veteran trees. Details of veteran tree identification are provided in the General Observations or Comments column in Annex B Tree Survey Schedule in the ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] .
SNC-037	Arboriculture	6.4 The Council notes that no explicit Hedgerow Regulations Assessment has been completed or submitted as part of this DCO and has significant concerns regarding the approach taken to identifying important hedgerows. APP-119 states that in the absence of an Important Hedgerow Survey, it has been assumed that there are a number of Important Hedgerows across the Order Limits, with Section 5 indicating that this assessment is based solely on ecological value. This approach excludes hedgerows that may be important for historic	Identification of possible historic hedgerows was included within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021] . A number of Important Hedgerows (as defined within Hedgerow Regulation 1997) within the Order Limits, are shown in Hedgerow and Tree Protection Order Plan [AS-004] . The majority of hedgerows within the Order Limits have been assumed to be important due to their heritage value.

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		reasons (e.g. pre-enclosure field systems). The Council is therefore concerned that the full implications for important hedgerows have therefore not been assessed and considers this information is essential to inform the Examination. Accordingly, the Council requests that the submission of a Hedgerow Regulations Assessment is provided to the Examining Authority, to ensure that all important hedgerows are properly identified and assessed prior to the determination of the DCO.	Taking a precautionary approach within the Landscape and Visual Impact Assessment presented within ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] the Applicant has considered that hedgerows are important with heightened value, which influences the overall sensitivity of the landscape resource as defined in ES Volume 3, Appendix 7.2 -Landscape Baseline [APP-119]. A hedgerow regulations assessment would either: (a) confirm the precautionary position; or (b) set out that some hedgerows aren't important, and therefore in either case, a reasonable worst-case assessment has therefore been applied. The UKHab surveys identified hedgerows as qualifying as priority habitats under Section 41 of the NERC Act 2006 and considered to be habitats of principle importance for nature conservation. Therefore, their importance is established in the assessment of this resource. The assessment therefore remains robust in absence of an explicit Hedgerow Regulations Assessment. The design approach has sought to minimise impacts to hedgerows and the identification of importance under the hedgerow regulations would not alter the approach taken, in that hedgerow's loss is only identified where no reasonable alternative solution is possible.

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SNC-038	Outline Landscape and Ecology Management Plan	6.5 The Outline Landscape and Ecology Management Plan [APP-199] sets out landscape mitigation measures, including Broadleaf Woodland, Linear Tree Belts and Individual Trees, Scrub, Native Hedgerows, Native Hedgerow with Trees, Instant Hedgerow, Flower Rich Pollinator, Tussocky Grassland, Neutral Grassland, Modified Grassland. The Council has the following comments. 6.5.1 As noted above in Section 5 of this representation, the introduction of woodland and tree belts into the predominantly open and rural landscape may create a sense of enclosure. This has the potential to be detrimental to the setting and experience of heritage assets and may also appear out of character with the open countryside;	The Applicant refers to its response to SNC-018. The Applicant considers the proposed landscape measures which include woodland, hedgerows, and trees proposed within the Outline LEMP [APP-199] have been carefully sited with regard to existing characteristic landscape features. Where proposed planting has the potential to influence landscape character, this has been assessed within ES Volume 3, Appendix 7.4 – Landscape Assessment Tables [APP-120].
SNC-039	Outline Landscape and Ecology Management Plan	6.5.2 The OLEMP also states that where Instant Hedgerows are not available, close-boarded fencing may be used to provide screening for glint and glare and visual amenity. The Council strongly objects to the erection of close-boarded fencing in the countryside for this purpose, as this would appear significantly out of character and harmful to the landscape, even with	The Applicant has included the provision for fencing as a backstop position in six discreet locations across the Order Limits. These measures are included for Glint and Glare mitigation at these locations for impacts upon road safety and residential amenity. As defined in the Outline LEMP [APP-199] in Section 3.11, if required (in the absence of an instant hedgerow being available) these features will be temporary and for a short-term time period, installed

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		hedgerow planting alongside these fence panels;	alongside a new hedgerow whilst this landscape measure establishes.
SNC-040	Arboriculture	6.5.3 Confirmation is required as to whether all "important" hedgerows have been identified. The Council considers that there may be systemic omissions of certain categories (see above) and failure to identify or survey hedgerows that may meet the criteria for importance;	The Applicant refers to its response to SNC-037
SNC-041	Landscape and Visual	6.5.4 The Council notes that the proposed landscape planting around the three 400kV substations comprises of the flower-rich pollinator mix, native hedgerow with trees, and some native linear tree belts at a greater distance. Due to safety requirements, the Council understands that trees can't be planted in close proximity to the substations or along their boundaries. However, this does result in the substations appearing as prominent and visually intrusive elements within the open landscape;	The Applicant notes the Council's comments regarding the landscape planting around the three 400kV Project Substations. The Applicant draws attention to the fact that the extents shown on the Works Plan [AS-002] and [AS-003] define the maximum spatial extent of each Work Number rather than the actual footprint of the built substation infrastructure. As set out in the Design Principles, Parameters and Commitments [APP-213], the maximum compound area for each of the 400kV Project Substations is up to 3ha (BESS Site), up to 3.5ha (Sub-Site 5A) and up to 1.1ha (Sub-Site 1B), with a maximum height of up to 13m to the top of the busbars. The 400kV Project Substations fall within Work No. 3A as described in Schedule 1 of the Draft Development Consent Order [AS-032]. The associated landscape and biodiversity mitigation measures, including flower-rich pollinator mix,

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			native hedgerow with trees and native linear tree belts, are secured within Work No. 7 and Work No. 10 and shown on the Green Infrastructure Strategy [AS-005] and within Appendix B of the Outline LEMP [APP-199]. The siting of the substation infrastructure at the detailed design stage will need to be undertaken in a manner that respects and accommodates the landscape measures committed to on the Green Infrastructure Strategy [AS-005], together with the minimum offset distances set out in the Design Principles, Parameters and Commitments [APP-213] (including 10m from hedgerows, 15m from individual trees, groups of trees and non-Ancient Woodland, and 15m from PRoW). The commitments relating to the appearance of the 400kV Project Substations are also secured through the Design Principles, Parameters and Commitments [APP-213], which requires that the exact colour, subject to manufacturer specifications, will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. Implementation of the landscape measures is secured through Requirement 7 (LEMP) of Schedule 2 to the Draft Development Consent Order [AS-032], with the design parameters and commitments secured through Requirement 5.

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SNC-042	Outline Landscape and Ecology Management Plan	6.5.5 The planting schedules propose a species mix that appears overly prescriptive; replacement planting should instead reflect the original species composition or be tailored to site-specific conditions.	The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline planting densities and indicative planting species for each typology. No planting schedules are included, as these details will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft Development Consent Order [AS-032] .
SNC-043	Arboriculture	6.6 Although the locations of ancient woodland are identified by Project Section within the application documents, there is no corresponding identification of veteran tree specimens. This information is necessary to enable the Council to properly review and provide informed comments.	Veteran tree specimens are identified in Table 1.2, paragraphs 1.2.40 and 1.4.6 and their locations are shown in Annex C Tree Constraints Plan in the ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] .
SNC-044	Noise and Vibration	7.1 The Council considers that the Environmental Statement provides insufficient detail to assess potential noise and vibration impacts during both construction and operation. The BESS has not been modelled at the worst-case scenario for assessment and there is therefore no certainty regarding the adequacy of the proposed mitigation. Daytime hours have been used to assess the low frequency noise from the BESS and	The assessment presented in the ES provides results, based on indicative plant noise data and locations. Detailed plant specifications are not available at this stage. However, the following commitments are included in the Outline OEMP [APP-197] : Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048].

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		substations. However, to assess a true worst-case scenario morning, daytime, evening and nighttime should all be assessed. This is of particular concern give that the BESS is likely to be one of the main sources of noise for this project.	- The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on ProWs will not exceed 55 dBA. Paragraph 12.8.49 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] confirms that the assessment is based on a worst-case scenario, and that all the BESS enclosures and BESS inverters are operating at the worst-case design duty, and that in reality this operation is unlikely to occur. It is therefore likely that sound levels at receptors would be lower than indicated within the assessment. The highest noise levels produced by the Scheme are during the daytime, and these levels have been used to calculate low frequency noise levels to provide a worst-case assessment. The low frequency noise criteria used within the assessment are based on the night-time curve presented within NANR45. The assessment is therefore made based on the low frequency noise levels generated during the daytime, but assessed against night-time criteria. As night-time background sound levels are lower than those during the evening period, this approach is therefore a worst-case and robust approach based on worst-case operating noise levels at any point

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			during a 24-hour period and assessed against the lowest background sound levels. However, to demonstrate impacts during the evening, an assessment will be undertaken and presented within a technical note at Deadline 1.
SNC-045	Noise and Vibration	7.2 Table 12-22 [APP-048] presents noise levels by time of day. However, the Council requests that the data is split further to reflect more refined time periods, in recognition of the lower levels of background noise levels typically experienced in rural Norfolk during the evening. • Early Morning 04:00-07:00 • Daytime 07:00-19:00 • Evening 19:00-23:00 • Night 23:00-04:00	The following assessment periods have been used in the operational noise assessment: • Daytime (07:00 – 23:00) • Night-time (23:00 – 04:00) • Early morning (04:00 – 07:00) BS 4142:2014+A1:2019 defines the reference time interval as being 1 h during the day from 07:00 to 23:00 and 15 minutes at night between 23:00 and 07:00. The standard re-iterates this in Section 7.2 which defines these periods as being typical. The early morning period is expected to represent the worst-case impacts at receptors while all equipment could be operational. Paragraph 12.8.50 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] notes that '<i>for a given difference between the rating level and the background sound level, the magnitude of the overall impact might be greater for an acoustic environment where the residual sound level is high than for an acoustic environment where the residual sound level is low.</i>' It also notes that

ID	Theme	Representation	Applicant's Response
			<i>'where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background. This is especially true at night'.</i> It is acknowledged that background sound levels in the local area are low, and that the calculated rating levels are also low (below 35 dB $L_{Ar,Tr}$ in all cases). It is therefore expected that if background sound levels were any lower in the evening than during the early morning period, this would not affect the overall impact of operational noise from the Scheme, or significance of effects. This is because the absolute levels would be more relevant than the margin by which the rating level exceeds the background sound level. However, to demonstrate impacts during the evening, an assessment will be undertaken and presented within a technical note by Deadline 1.
SNC-046	Noise and Vibration	7.3 The consultant has assessed the impact of the HDD works as being not significant based on BS5228 but does not appear to take into consideration the very low background noise levels in the area.	The measured ambient sound levels have been used to derive the LOAEL and SOAEL assessment criteria for construction works, based on guidance provided within BS 5228-1:2009+A1:2014. This is described in Table 12-7 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] .

ID	Theme	Representation	Applicant's Response
SNC-047	Noise and Vibration	7.4 Whilst the Council understands that the final specifications of the equipment have not yet been finalised, the lack of definitive parameters creates uncertainty as to whether the proposed mitigation can be achieved or would be adequate. This raises the potential for significant impacts on the amenity of nearby residents.	The following commitments are included in the Outline OEMP [APP-197]: - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on ProWs will not exceed 55 dBA.
SNC-048	Noise and Vibration	7.5 It is also unclear what mitigation measures have been applied to achieve the change in noise levels for Table 12-26 [APP-048] for residual operational effects or what levels of attenuation have been assumed in the calculations.	The following commitments are included in the Outline OEMP [APP-197]: - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on ProWs will not exceed 55 dBA. Example mitigation solutions are provided in paragraph 12.9.3 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] These include

ID	Theme	Representation	Applicant's Response
			producing low-noise inverter models, acoustic enclosures, relocation or reorientation of plant, or installation of noise barriers. To achieve the levels set out in Table 12-26 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048], the reductions noted in Table 12-25 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] have been applied to individual inverters. Where inverters are located closer to receptors, the upper bound of sound reduction required has been applied. The amount of reduction required reduces with increased distance between solar inverters and receptors.
SNC-049	Noise and Vibration	7.6 The mitigation measures applied within the modelling in Appendix 12.2 [APP-179] have not been presented. The Council requires full details of what is proposed. We note that mitigation (~6dB) is proposed for some of the sites to reduce their impact on the existing noise environment. However, details of the specific measures proposed, and the practicality of their installation should be provided. The Council recommends that the mitigation measures are implemented across all sites to reduce the impacts as much as possible in accordance with the best practicable means (BPM). In addition, the Council considers	The mitigation applied within ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179] is stated in Table 12-25 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The location of solar inverters has not yet been finalised, and example locations have been used within the assessment. The assessment therefore does not consider relocating equipment (as a worst-case limitation), but does consider noise reduction measures applied to the solar inverters, which could involve procurement of low-noise inverters, acoustic enclosures, reorientation of plant or installation of noise barriers.

ID	Theme	Representation	Applicant's Response
		that the Environmental Statement fails to demonstrate a robust worst-case assessment, as required by established EIA principles. In the absence of sufficient detail and certainty, this introduces a material level of uncertainty, which should be resolved in favour of the Council's position in the planning balance.	The specific implemented measures are subject to detailed design work when plant details are finalised.
SNC-050	Noise and Vibration	7.7 Table 3.14 of Appendix 12.2 [APP-179] provides a summary of Sound Source Data. However, this does not include any details of the National Grid Substation or its associated equipment. This requires clarification as the Council is concerned that the National Grid substation may not have been adequately modelled, including whether appropriate data has been used to assess its noise impact.	As noted within the Outline OEMP [APP-197] : <i>"The National Grid Substation will be located, or where this not practicable, mitigated, to ensure that the predicted façade incident rating level of sound at the nearest residential receptors shall not exceed the background sound level."</i>
SNC-051	Noise and Vibration	7.8 Paragraph 12.8.44 of document reference APP-048 states that 14 residences would experience an early morning noise impact between 1 and 5dB above background. However, the report does not specify how many properties would be impacted by increases at the lower end (1dB) versus the upper end (5dB) which limits the ability to properly understand the distribution of impacts. The assessment of	This query appears to relate to the outcomes of the assessment if the Scheme were delivered in absence of any mitigation. With inclusion of mitigation, Table 12-26 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] outlines that one receptor would experience rating levels above the background sound level during the early morning period and at night. The affected receptor is NSR3B, where the calculated rating level is 33 dB $L_{A,T}$ during the

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		noise effects is informed by the concepts of the Lowest Observed Adverse Effect Level (LOAEL) and the Significant Observed Adverse Effect Level (SOAEL), as set out in the Noise Policy Statement for England and applied through the National Planning Policy Framework and Planning Practice Guidance. These policy documents do not prescribe fixed numerical thresholds and require such levels to be determined on a case-specific basis, having regard to local baseline conditions. 7.9 In this context, the Council considers that, given the very low background noise levels characteristic of this rural area, even relatively small increases above background 15 may give rise to adverse effects on residential amenity. The Council is therefore concerned that the impacts may be understated in the report and that some receptors could experience a greater level of effect than presented.	early morning period, and the background sound level is 32 dB $L_{A90,15\text{minutes}}$. The calculated rating level is 33 dB $L_{Ar,Tr}$ during the night-time period, and the background sound level is 31 dB $L_{A90,15\text{minutes}}$. Paragraph 12.8.50 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] notes that '<i>for a given difference between the rating level and the background sound level, the magnitude of the overall impact might be greater for an acoustic environment where the residual sound level is high than for an acoustic environment where the residual sound level is low.</i>' It also notes that '<i>where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background. This is especially true at night</i>'. On this basis, noise impacts are expected to be lower than presented, due to the low background and rating levels. This is because the absolute levels would be more relevant than the margin by which the rating level exceeds the background sound level.
SNC-052	Noise and Vibration	7.10 The Council has concerns regarding the levels used in APP-048 and as such, some residents may be exposed to higher levels of noise impact than the report	This query relates to the outcomes of the assessment if the Scheme were delivered in absence of any mitigation.

ID	Theme	Representation	Applicant's Response
		suggests. The Council's position is that noise emissions should be controlled such that they do not exceed background levels at sensitive receptors, consistent with the approach taken in previous BESS developments approved under the TCPA. The Council does not consider that there is any justification for departing from this approach in the present case.	In absence of proposed mitigation, the NOAEL and LOAEL could be exceeded, which could result in significant impacts at some receptors. However, the following commitments are included in the Outline OEMP [APP-197] to reduce the impacts and achieve the criteria of the local authority, where practicable: • Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. • The rating level from other elements will not exceed the background sound level at other residential receptors. • Specific sound levels on ProWs will not exceed 55 dBA.
SNC-053	Noise and Vibration	7.11 The report also states that seven properties will experience morning noise levels of between 6 and 8db, which it defines as significant, long-term, and moderately adverse. This is approaching the Significant Observed Adverse Effect Level (SOAEL) of 10dB. The paragraph then directs the reader to section 12.9 (Additional Measures). However, this section only suggests potential ways to reduce the noise and includes a table showing the extent of	The following commitments are included in the Outline OEMP [APP-197]: • Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. • The rating level from other elements will not exceed the background sound level at other residential receptors.

ID	Theme	Representation	Applicant's Response
		reductions required. Further detail is needed on the specific mitigation measures to be implemented and the practicality of delivering them.	Specific sound levels on ProWs will not exceed 55 dBA. The specific implemented measures are subject to detailed design work when plant details are finalised.
SNC-054	Noise and Vibration	7.12 The project appears to rely entirely on horizontal directional drilling (HDD), which can be a major source of noise and vibration nuisance. No justification has been provided as to why these works would need to be continuous. If works are required outside of the core hours, the Council reminds the applicant that this can be secured through a S61 application and does not need to be included in the DCO. However, to ensure clarity and enforceability, construction hours must be secured within the DCO and not deferred to later consent regimes. The Council also considers that noisy works should not be permitted to start before 08:00, Monday to Friday.	The construction hours are set out within ES Volume 1, Chapter 4 – The Scheme [APP-040]. The core construction working hours (not including start-up and shut-down works) are 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 HDD which must be continuous activity) or in an emergency. As per paragraph 4.4.16 of ES Volume 1, Chapter 4 – The Scheme [APP-040], Horizontal Directional Drilling (HDD) has been considered as a reasonable worst-case scenario, which could occur at night for the purposes of the assessment. Paragraph 12.7.12 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] states: “<i>The precise locations and requirements for trenchless</i>

ID	Theme	Representation	Applicant's Response
			<i>drilling (e.g. Horizontal Directional Drilling (HDD)) works will only be confirmed once a principal contractor is appointed.</i> <i>...The principal contractor will review alternative plant and equipment options and may adopt quieter machinery than that modelled in ES: Appendix 12.2 Noise Modelling and Calculations [EN0110014/APP/6.3.12.2], where reasonably practicable."</i> Continuous HDD activities may need to be undertaken continuously over 1-2 days or longer to ensure the safe and successful completion of the drill. Interruptions can increase the risk of borehole instability, drilling fluid settlement, equipment becoming stuck within the bore, and potential failure of the installation. Boreholes will be undertaken to determine the ground Strata, once established a duration will be determined. A worst-case scenario has been assumed accounting for possible nighttime HDD. If there is a requirement to work outside of normal working hours (i.e. for HDD and or emergency works), this will be controlled through the prior approval process in Section 61 of Control of Pollution Act via SNC. This will be based on the specific construction activities that are required for evening and/or night-time periods.

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			The anticipated effects from HDD are expected to be short-term, negligible to major adverse, which are not significant due to the temporal nature of the work.
SNC-055	Noise and Vibration	7.13 Driven piles are not considered acceptable due to the levels of noise and vibration they produce. It is recommended that screw piles are considered instead, especially as they would facilitate easier decommissioning.	As noted in paragraph 4.3.7 of ES Volume 1, Chapter 4 – The Scheme [APP-040], driven piles are the most common installation solution on existing UK solar farms. The construction noise assessment results presented in Table 12-18 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] outlines that one noise sensitive receptor (NSR29, commercial facilities on Bungay Road) is expected to experience temporary short-term effects medium/high impact during piling works. At other receptors, construction activity will likely cause short term, negligible to minor adverse effects, and are considered not significant. Therefore, where piling is to be undertaken in the vicinity of the commercial premises on Bungay Road, alternatives to driven piles will be considered.
SNC-056	Noise and Vibration	7.14 A Noise Impact Assessment based on the “ABC method” from BS5228 should be undertaken prior to commencement. A	A noise assessment based on the ABC method in BS 5228 has accompanied the Noise and Vibration chapter (ES Volume 1, Chapter 12 –

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		vibration assessment should similarly be completed prior to commencement.	Noise and Vibration [APP-048]). A construction vibration assessment has also been undertaken. These are presented in Table 12-5 and adopted in the impact criteria within Table 12-7 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] .
SNC-057	Cable Route Construction Soils and Agriculture	7.15 The Outline Cable Route Construction Statement [APP-216] states that spoil (topsoil and subsoil) will be stored temporarily within designated areas along the Cable Route Corridor (CRC) and within the temporary construction compounds. The spoil will be utilised to backfill the launch and reception pits, and to reinstate the temporary construction compounds and temporary access tracks. It further states that any contaminated spoil identified during construction would be transported off Site to a licenced waste facility for treatment. However, the Council are concerned that this appears to conflict with the Soil Resource Management Plan [APP-204] which states that all subsoil displaced by the cable will be removed from site. Further clarification is therefore requested on this apparent inconsistency.	The Outline SRMP [APP-204] does not specify the removal of subsoil. We will liaise with the consultee to seek to understand the concern and resolve any discrepancies.
SNC-058	Construction and Decommissioning	7.16 The Council advise that consideration should be given to the prevailing weather conditions in the area. In recent years the	The applicant notes this comment. The Outline SRMP [APP-204] includes consideration of soil moisture and weather conditions. ES Volume 1,

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	Soils and Agriculture	weather conditions in Norfolk have been that we have had approximately nine months of drought followed by three months of rain. This has caused one DCO to only undertake excavation work for nine months of the year with the soils being unworkable in the remaining three months.	Chapter 18 – Other Environmental Matters [APP-054] considers natural disasters from the weather. The outline SRMP also considers the likely periods when soils will be suitable for being managed. This is an adaptive document in that it advises on soil suitability depending on the condition of the soil as a result of rainfall, and therefore variable climatic and seasonal conditions are embedded into the plan.
SNC-059	Ground Conditions	7.17 The Ground Contamination Report [APP-107] has generally concluded that there is a low risk to human health and appears to discount potential risks. But as it identifies potential SPCs, site investigation must be undertaken to quantify the level of risk. While it is accepted that the majority of the site may present a low risk due to its long-term use as agricultural farmland, other identified areas, e.g. former military establishments, have a clear potential for contamination. The types of contamination which could have significant implications for construction workers, existing residents, groundwater and the wider environment. The report does not explicitly state that site investigation will not be undertaken, but neither does it confirm that it will. The	Outline CEMP [APP-196] includes ground investigation as a mitigation measure, with the detailed design of the scheme to be informed by the results of the ground investigation and that the results of the ground investigation “<i>will be reviewed by the Contractor</i>”. Where the investigations identify a potential hazard this will be assessed and, where necessary, remediated or appropriate mitigation included by the Contractor. In addition: The Outline CEMP [APP-196] states that the Pre Construction Information Pack (PCIP) “<i>will contain all information that is held or readily available and will be used by the Principal Contractor to prepare construction phase risk assessments and method statements. The risk assessments will be informed by the findings of the Ground Investigation</i>”.

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		Council consider this lack of clarity to be unacceptable. 7.18 The report indicates that the risk associated with the former RAF bases is between Very Low and Low for the identified receptors. The Council agrees with the applicants' assessment regarding groundwater, surface water and ecology, but disagrees with the assessment of risk to human health. This is primarily due to the proposed excavation works required for the installation of cables and associated infrastructure, which create pathways for direct contact with, and inhalation of, potentially contaminated materials.	- The Outline CEMP [APP-196] also includes measures such as awareness briefings, use of methods of working to limit disturbance of potentially contaminated soil or water and to reduce generation of dust, the promotion of good hygiene during construction, and the use of occupational health and safety measures such as PPE and compliance with confined spaces working regulations. - The Outline CEMP [APP-196] requires the Contractor to develop a protocol for dealing with any unexpected contamination. This protocol will include details of how the contamination will be further investigated, assessed and remediated. On the basis of the above, were a credible potential hazard to construction workers associated with the former RAF airfields to be identified, it would be assessed and remediated / mitigated.
SNC-060	Construction and Decommissioning	7.19 In summary, the Council considers that the assessment of construction impacts is insufficiently robust and lacks the level of detail required to demonstrate compliance with relevant policy and best practice. Key areas of concern include the reliance on continuous HDD works without justification,	The full extent or 'worse case' effects arising from the Scheme are identified and reported in the Environmental Statement (ES) [APP-036 – APP-195]. The ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the

ID	Theme	Representation	Applicant's Response
		the absence of clearly defined and enforceable construction controls within the DCO, inconsistencies in approach to spoil management, and a lack of clarity regarding contamination risks and mitigation. In addition, the potential for significant noise, vibration and environmental effects during construction has not been adequately assessed or addressed. All of these concerns have been set out in further detail in Appendix 1 Noise Report and the Council reserve the right to comment further as and when further details are submitted throughout the examination. 7.20 The Council therefore considers that further information, clarification and strengthened DCO controls are required to ensure that construction impacts are appropriately managed and that unacceptable harm to residential amenity and the environment is avoided.	Scheme design that are not yet fixed and, therefore, it may be necessary for the Environmental Impact Assessment (EIA) to assess likely worst case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Considering a reasonable worst case is standard practice for EIA in the UK. Each ES Volume 1 technical chapter [APP-041 – APP-056] has assessed the design identified to be the likely worst-case scenario for that discipline in order to determine effect significance. Where necessary and appropriate, the technical chapter also sets out mitigation measures that would be implemented as part of the Scheme to address the effects identified. Measures to manage and minimise effects are set out in the outline management plans [APP-196 – APP-204] for the Scheme. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the Draft DCO [AS-032], ensuring that effects associated with the Scheme are appropriately controlled. In relation to construction, see paragraphs 1.6.7 and 1.6.8 of the Explanatory Memorandum (AS-034) which sets out the suite of control mechanisms applicable to construction. For

ID	Theme	Representation	Applicant's Response
			example the CEMP (Requirement 13) and the CTMP (Requirement 15), Specifically, the assessment presented within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] notes that 15 receptors could experience sound levels above the SOAEL during the night due to Horizontal Directional Drilling (HDD) works. It is anticipated that, if required, HDD will take place over 1-2 days within one drilling location and therefore, in accordance with BS 5228, temporary accommodation or noise insulation measures are not required to be offered to the residents due to the short-term nature of the works. HDD activities may need to be undertaken continuously over 1-2 days or longer to ensure the safe and successful completion of the drill. Interruptions can increase the risk of borehole instability, drilling fluid settlement, equipment becoming stuck within the bore, and potential failure of the installation. Boreholes will be undertaken to determine the ground Strata, once established a duration will be determined. A worst-case scenario has been assumed accounting for possible nighttime HDD. If there is a requirement to work outside of normal working hours (i.e. for HDD and or emergency works), this will be controlled through the prior

ID	Theme	Representation	Applicant's Response
			approval process in Section 61 of Control of Pollution Act via SNC. This will be based on the specific construction activities that are required for evening and/or night-time periods. The anticipated effects from HDD are expected to be short-term, negligible to major adverse, which are not significant due to the temporal nature of the work.
SNC-061	Electromagnetic Fields	7.21 The Council has concerns regarding the adequacy of the assessment of Electromagnetic Fields and sets out below its requests for additional information/clarification from the applicant. 7.21.1 Please provide evidence, including calculations, demonstrating that electromagnetic field (EMF) levels will be reduced below 4kV m⁻¹. Additionally, please specify the predicted EMF levels that will be experienced at the relevant receptor locations.	The Applicant has used measured data, including field strength and distances, managed by National Grid to undertake the assessment presented in ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]. The Applicant therefore considers this data robust and reliable, which has been used to undertake the assessment and draw conclusions. ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188] states (section 4.2.3) that there are no external electric fields associated with underground cables (of any voltage capacity) and therefore the electric field strength will be below 4 KV m⁻¹. Figure 17.4 of the technical assessment presents that the electric field strength will be less than 4kV m⁻¹ within 20m from the centreline, and therefore within the range of 45-50m. Further to this, the predicted EMF

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			levels at the relevant receptor locations will therefore be below the threshold level of 5kV m ⁻¹ .
SNC-062	Electromagnetic Fields	7.21.2 Please provide evidence demonstrating that the EMF will effectively be contained within the underground cable's insulation and sheath.	ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188] draws this conclusion from published information managed by National Grid and therefore considers this conclusion robust and reliable. It should be noted that the statement refers to electric fields associated with underground cables specifically, where underground cables are constructed with an insulating layer or sheath, where this insulating layer/sheath acts as an electrostatic shield.
SNC-063	Electromagnetic Fields	7.21.3 Please justify why human health is only classified as being of only Medium Sensitivity. While humans may be regularly be exposed to EMF, this but does not necessarily mean that they are not sensitive to them, nor that even a slight increase in EMF would not have an adverse effect.	Human health is classified as being of Medium sensitivity due to routinely experiencing varying EMFs within a regulated range. Table 1 of ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188] outlines the sources and field strengths of EMF experienced by humans. Therefore, as outlined in Table 17.4 ES Volume 1: Chapter 17 - Electromagnetic Fields [APP-053] , an alternate sensitivity classification (i.e. High) is not considered appropriate for human health.
SNC-064	Electromagnetic Fields	7.21.4 Please provide calculations to support the statement that the magnitude of impact is Low, and the resulting impact	The maximum magnetic field strength for the maximum voltage overhead cable (400kV) is below the threshold value of 100µT. Therefore, the magnitude of any impact experienced will be Low. A Low impact for a receptor of Medium Sensitivity

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		significance is Minor and Not Significant with regard to overhead cables.	(human health) results in a Minor and Not Significant effect. The maximum electric field strength for the maximum voltage overhead cable measures 10.6 kV m⁻¹. The field strength measures below the threshold value of 5 kV m⁻¹ within 15m from the centreline. Given that a 'typical 400 kV pylon is 45-50 metres tall' (Source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022), and the distances between the relevant receptors, the field strength of any electric field will be below the threshold value of 5 kV m⁻¹. Therefore, the magnitude of any impact experienced will be Low. A Low impact for a receptor of Medium Sensitivity (human health) results in a Minor and Not Significant effect.
SNC-065	Electromagnetic Fields	7.21.5 Please provide evidence to support the 10 kV m ⁻¹ statement along with calculations demonstrating the <5 kV m ⁻¹ level, including the actual predicated value.	Figure 17.4 ES Volume 3, Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188] shows that the maximum electric field measures 10.6 kV m⁻¹. The same figure shows that the electric field strength will be less than 5kV m⁻¹ within 15m from the centreline, and therefore within the range of 45-50m. Given that a 'typical 400 kV pylon is 45-50 metres tall' (Source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022), and the distances between the relevant receptors, the

ID	Theme	Representation	Applicant's Response
			field strength of any electric field will be below the threshold value of 5 kV m ⁻¹ .
SNC-066	Noise and Vibration Draft Development Consent Order	7.22 Access Roads should not be located within 30m of residential properties, as APP-048 identifies this distance as exceeding the Significant Observed Adverse Effect Level (SOAEL). For certainty and security, a requirement should be added to prevent access roads being located any closer to residential dwellings.	This query relates to internal access roads, and their potential impacts arising during construction. The construction of access roads within 30 m of dwellings could lead to the SOAEL being exceeded in the short-term. The magnitude of impact for this would be high or medium, and for a high sensitivity receptor, this could lead to a moderate or major adverse effect. However, based on the effects being short-term, the temporal significance threshold is unlikely to be exceeded (i.e. the SOAEL is not expected to be exceeded for a period of 10 or more days of working in any 15 consecutive days, or for a total number of days exceeding 40 in any 6 consecutive months). The effect is therefore not significant. However, to reduce impacts, mitigation will be incorporated, such as consideration of the location of internal access routes and localised temporary barriers during construction. The use of acoustic barriers to minimise noise impacts is noted in the Outline CEMP [APP-196]. The Applicant will take in to consideration the design and location of access points having regard to the proximity to existing dwellings.

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SNC-067	Noise and Vibration	7.23 The Council notes that any replacement equipment, particularly relating to the substations and BESS, should be accompanied by a Noise Impact Assessment (NIA) to ensure that the noise environment is not adversely affected and that any replacement equipment is an equivalent or improved standard in terms of noise performance. While the applicant confirms in paragraph 12.2.19 of APP-048 that this has been scoped out of the Environmental Statement, the Council considers that provision should be secured to address the long-term impacts of the project arising from the installation of replacement equipment.	The Outline OEMP [APP-197] commits to the following for future plant on the Scheme: - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on ProWs will not exceed 55 dBA. The monitoring requirements also state that where noise changes or complaints are raised, a comparison will be made against noise emissions with those presented within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Where noise emissions are found to be above those presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048], noise mitigation will be applied as required.
SNC-068	Noise and Vibration	7.24 As noted above, nighttime Horizontal Directional Drilling is unacceptable. The Council requests that a requirement be added to restrict construction hours in order to protect residential amenity.	The assessment presented within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] notes that 15 receptors could experience sound levels above the SOAEL during the night due to HDD works. It is anticipated that, if required, Horizontal Directional Drilling (HDD) will take place over 1-2 days within one drilling location and

ID	Theme	Representation	Applicant's Response
			therefore, in accordance with BS 5228, temporary accommodation or noise insulation measures are not required to be offered to the residents due to the short-term nature of the works. HDD activities may need to be undertaken continuously over 1-2 days or longer to ensure the safe and successful completion of the drill. Interruptions can increase the risk of borehole instability, drilling fluid settlement, equipment becoming stuck within the bore, and potential failure of the installation. Boreholes will be undertaken to determine the ground Strata, once established a duration will be determined. A worst-case scenario has been assumed accounting for possible nighttime HDD. If there is a requirement to work outside of normal working hours (i.e. for HDD and or emergency works), this will be controlled through the prior approval process in Section 61 of Control of Pollution Act via SNC. This will be based on the specific construction activities that are required for evening and/or night-time periods. The anticipated effects from HDD are expected to be short-term, negligible to major adverse, which are not significant due to the temporal nature of the work.

ID	Theme	Representation	Applicant's Response
SNC-069	Construction and Decommissioning	7.25 All below ground foundations and infrastructure should in their entirety, be removed rather than only to a depth of 1.2m as stated in APP-198. This approach would prevent future issues associated with residual material being left in the ground. However, the Council questions the practicality of preparing a Decommissioning Environmental Management Plan (DEMP) at this stage. Given the lifespan of the project, it would be more appropriate to secure this through a requirement, as decommissioning practises are undoubtedly going to evolve over time.	The Applicant notes SNC's comments regarding below-ground foundations at decommissioning and the timing of the DEMP. The approach to below-ground infrastructure at decommissioning, including cutting to 1.2m below the surface to enable future ploughing, is set out in the Outline DEMP [APP-198], and this has been considered where relevant within the ES. The detailed DEMP will be substantially in accordance with the Outline DEMP [APP-198] and is secured through Requirement 21 in Schedule 2 of the Draft DCO [AS-032], ensuring decommissioning practice can evolve appropriately having regard to Government policy and good practice at the time.
SNC-070	Ecology and Biodiversity	8.1 The Council expects all developments to take every reasonable opportunity to enhance biodiversity and deliver a measurable net gain for nature. This requires strict adherence to the mitigation hierarchy i.e. avoidance, minimisation and compensation and should be supported by robust biodiversity net gain measures.	Whilst there is currently no legislative requirement for the Scheme to provide BNG, the Applicant has included a commitment to a minimum of 10% BNG through Requirement 9 of the draft DCO [AS-032]. The Applicant has therefore taken the opportunity to enhance biodiversity and deliver a measurable net gain for nature. This includes the calculation of habitat baseline values and post-construction values provided within the Biodiversity Net Gain Statutory Metric [APP-218].

ID	Theme	Representation	Applicant's Response
SNC-071	Ecology and Biodiversity	8.2 The applicant has committed to delivering BNG, to be secured through Requirement 9 of the Draft DCO and has provided a Biodiversity Net Gain Report [APP-218] and a Biodiversity Net Gain Statutory Metric [APP-220] setting out baseline and expected post intervention habitats. In line with TCPA planning applications, the Council would normally request an Excel version of the metric for review, together with copies of the condition assessments. The Council also strongly encourages alignment with the Local Nature Recovery Strategy (adopted October 2025) and the Norfolk Local Habitat Map to inform the BNG strategy and best practice guidance to ensure appropriate post-construction management of BNG.	Whilst there is currently no legislative requirement for the Scheme to provide BNG, the Applicant has included a commitment to a minimum of 10% BNG through Requirement 9 of the Draft DCO [AS-032]. The Applicant has therefore taken the opportunity to enhance biodiversity and deliver a measurable net gain for nature. This includes the calculation of habitat baseline values and post-construction values provided within the Biodiversity Net Gain Statutory Metric [APP-219]. Whilst the Schemes design evolution has progressed prior to the publication of the LNRS, the embedded design principles adopted and detailed within Design Principles, Parameters and Commitments [APP-213] have been applied to retain, protect and enhance ecological assets. Where possible, areas of land located within the Order Limits designated as 'areas that could become of particular importance' (ACB) within the LNRS have been targeted with their suggested habitat type when developing the ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. This not only contributes towards a quantifiable BNG, but also helps to strengthen existing habitat networks and increase landscape connectivity. These measures are calculated within and inform both the Biodiversity Net Gain Report [APP-218]

ID	Theme	Representation	Applicant's Response
			and Biodiversity Net Gain Statutory Metric [APP-219] .
SNC-072	Ecology and Biodiversity	8.3 Typically, for TCPA planning applications, there is a commitment to monitor the delivery of BNG measures over a 30-year period in line with the biodiversity gain condition under the Environment Act. This includes preparation of monitoring reports at defined intervals to demonstrate the ongoing delivery and maintenance of BNG. The Council therefore seeks clarification on the monitoring arrangements, including the frequency and content of monitoring reports, the body to which these reports will be submitted (for example, the LPA or the Planning Inspector). This is necessary to ensure that the BNG targets are being achieved, reported on transparently and maintained.	Whilst there is currently no legislative requirement for the Scheme to provide BNG, the Applicant has included a commitment to a minimum of 10% BNG through Requirement 9 of the draft DCO [AS-032]. The Applicant has therefore taken the opportunity to enhance biodiversity and deliver a measurable net gain for nature. This includes the calculation of habitat baseline values and post-construction values provided within the Biodiversity Net Gain Statutory Metric [APP-219]. The Applicant has provided outline commitments to post-developing monitoring, detailed within the Outline LEMP [APP-199]. The exact monitoring specifications will be detailed in the LEMP (secured by Requirement 7 of the Draft DCO [AS-032]) and updated as appropriate in subsequent iterations, to be reviewed and updated every five years through the operational lifetime of the Scheme. Table 4.1 Outline Management Schedule of the Outline LEMP [APP-199] details proposed monitoring activities, specific to the landscape/ecological feature in question.

ID	Theme	Representation	Applicant's Response
			Following from each monitoring activity, a monitoring report will be submitted to SNC, which will include any remedial actions undertaken to ensure targeted habitat condition assessment is achieved.
SNC-073	Ecology and Biodiversity	8.4 Ten species of bat were recorded within the Order Limits. The Bat Activity Survey [APP-157] concludes that the site is of national importance for its bat assemblages, including the rarer specialised Noctule, Natterer's, and Daubenton bats. The Environmental Statement further concludes that the site is of significant importance for the very rare Barbastelle bat which was found to be highly abundant and ubiquitous across the entire site. Given the presence and importance of these species, the Council considers it likely that a European Protected Species licence may be required under the Habitats Regulations. In this context, the applicant must demonstrate how the three derogation tests will be met, namely: (i) that there are no satisfactory alternatives; (ii) that the development is for imperative reasons of overriding public interest; and (iii) that the favourable conservation status of the species will be maintained.	The Applicant acknowledges the presence of Barbastelle Bat colonies surrounding the Order Limits and has considered the core sustenance zone within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Scheme designs primarily utilise intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular ploughing, tithing, harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including Barbastelle bat maternity roosts), therefore, land utilised for the Scheme is currently subject to regular disturbance, with the Scheme considered to represent no significant increase on this during construction and decommissioning and likely resulting in much

ID	Theme	Representation	Applicant's Response
		8.5 Data provided by the Norfolk and Norwich Bat Group identifies 12 Barbastelle bat maternity colonies whose Core Sustenance Zones overlap the Order Limits. Of these, Colonies at Saxlingham Wood and Spring Wood are located adjacent to the Order Limits. There are other ancient woodland adjacent to the order limits that have not been subject to survey by the Norfolk and Norwich Bat Group however, considering the roosting preferences of Barbastelle bats, it is not unreasonable to conclude that these woods are also likely to be used by Barbastelle bat maternity colonies.	reduced disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059], include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including Barbastelle bats. It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for an EPSML for Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would result in: (a) to impair their ability— • to survive, to breed or reproduce, or to rear or nurture their young; or • in the case of animals of a hibernating or migratory species, to hibernate or migrate; or

ID	Theme	Representation	Applicant's Response
			(b) to affect significantly the local distribution or abundance of the species to which they belong. ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157] have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the CSZ's of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. The Applicant agrees that there are potentially other woodlands in the wider landscape, and outside the DCO limits, that support further colonies of Barbastelle bats. As a precautionary measure, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing

ID	Theme	Representation	Applicant's Response
			towards the species favourable conservation status.
SNC-074	Ecology and Biodiversity	8.6 Research indicates that solar sites can have a significantly negative effect on bats, resulting in a notable decrease in bat activity at both the centre of solar farms and along adjacent boundary features. There is also evidence to suggest bats may be repelled by solar farm developments. As these impacts differ between species, the effects of solar PV on bat activity should be assessed on a species-specific basis, rather than grouping species into broad risk categories. The Council therefore requests that additional bat activity surveys of woodland adjacent to the scheme are undertaken to inform an addendum to the EIA, with specific consideration given to the potential presence of Barbastelle maternity colonies in woodlands adjoining the order limits.	The Applicant acknowledges the Councils comment regarding research on the relationship between bats and solar farms. Whilst the Council do not reference this specific research material, the Applicant assumes that this comment is received in relation to Tinsley et al (2023)¹, which claims to show a strong negative effect of Solar PV developments on foraging and commuting bats. However, there are several caveats which suggest that this study is not overly reliable, such as the standardised height of the detector microphones (1.27m) is about the mid-height of a typical solar panel and it is expected that solar arrays reflect and scatter sound (including bat calls) so a microphone at this height surrounded by panels should detect fewer calls than one in an open spaces even if bat activity is similar. These caveats are summarised within BSG (2026)². Conversely, other academic studies have also emerged recently which indicate the benefit of Solar PV sites for bat species.

¹ Tinsley, E.; Froideveaux, J.S.P; Zsebők, S.; Szabadi, K.L.; and Jones, G. (2023). Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity. *Journal of Applied Ecology* 60, 1752–1762.

² BSG. (2026). Do solar farms affect foraging & commuting bats? Available at: <https://bsg-ecology.com/bats-and-solar-farms/>

ID	Theme	Representation	Applicant's Response
			More guidance will be published on bats and solar PV sites, as presently, the Bat Conservation Trust are currently working with Natural Resources Wales (NRW) to provide a comprehensive synthesis of the available evidence on the interactions between solar energy developments and bat populations. To inform the assessment included in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] the Applicant has undertaken a desk study, ES Volume 3, Appendix 8.1 - Ecological Desk Study and Extended Habitat Survey [APP-152], and sought to understand the assemblage of bats through the ES Volume 3, Appendix 8.5 - Ground Level Tree Assessment Report [APP-156] and the ES Volume 3, Appendix 8.8 - Bat Activity Survey Report [APP-157]. To safeguard the species identified, the Applicant has adopted precautionary measures, through embedded design principles detailed within Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. These include a 30m standoff distance from ancient woodlands, at least 15m from woodlands, 10m from watercourses, and a minimum of 10m buffer between hedgerows/ditches and solar PV apparatus; which

ID	Theme	Representation	Applicant's Response
			is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199]. When considering the scale of the Scheme, this, will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure. In addition, the above-named documents also include commitments, to extensive buffering of woodlands/ ancient woodlands, ponds, trees, and watercourses and will include habitat creation/management within these buffer zones. Thereby, resulting in extensive landscape-wide habitat provision for the benefit of all local bat populations (amongst other species). The Applicant agrees that in some sites consisting of a broader mosaic of habitats, where different species may occupy specific ecological niches an assessment based on a species-specific approach could be justified. However, in this case the Order Limits are dominated by the sub-optimal cropland

ID	Theme	Representation	Applicant's Response
			habitat (88.8% of the Order Limits), and therefore, bat activity as a whole, is primarily focused upon existing linear habitats (hedgerows / watercourses / tree-lines / woodland edges), therefore, this concentration of bat activity, based on habitat availability, justifies the approach to impact assessment. The Applicant, having identified the species assemblage on the Site as part of the desk study which is included in ES Volume 3, Appendix 8.1 - Ecological Desk Study and Extended Habitat Survey [APP-152] and comprehensive bat surveys as per ES Volume 3, Appendix 8.5 - Ground Level Tree Assessment Report [APP-156] and ES Volume 3, Appendix 8.6 Bat Activity Survey Report [APP-157], has undertaken the assessment of key periods of bat ecology, specifically roosting and commuting/foraging. The results of the assessment are included in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Applicant disagrees that further targeted woodland surveys are required, due to the provision of embedded design principles in Design Principles, Parameters and Commitments [APP-213] that benefit woodland roosting bats present within the DCO Limits and wider

ID	Theme	Representation	Applicant's Response
			environment. If surveys were undertaken upon woodlands outside of the Order Limits, and bat roosts were confirmed/suspected, appropriate recommended mitigation/enhancement measures have already been designed into the Scheme design process (see above) to benefit these roosts, and therefore, the conclusion of the ecological assessment in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and supported by surveys detailed in ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157] would remain unchanged. Given ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] has been provided, it is not considered justified or proportionate to undertake further precautionary surveys.
SNC-075	Ecology and Biodiversity	8.7 In the absence of additional survey data, this results in a degree of baseline uncertainty which undermines the conclusions of the Environmental Statement. The Council request that solar panels are avoided on sites and sub-sites where they immediately abut woodland to minimise potential impacts to bats and especially maternity colonies. Greater consideration should also be given to improving habitat within the site for Barbastelles through increasing edge	Table 8.13 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] confirms that roosting and foraging/commuting barbastelle bats are of National importance. An understanding of the presence of bats and the distribution of bat roosts, including Barbastelle maternity roosts is included in Tables 3.3 and 3.4 of ES Volume 3, Appendix 8.5 - Ground Level Tree Assessment report [APP-156] and ES Volume 3, Appendix 8.6 Bat Activity Survey report [APP-157] .

ID	Theme	Representation	Applicant's Response
		habitats (scalloped edges to new woodland planting), in addition to restoring ponds, and providing insect rich corridors.	The Scheme design evolution has included embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] which are designed to avoid impacts upon surrounding woodlands and include for a minimum of 30m buffer of all ancient woodlands and 15m buffer of other woodlands immediately adjacent to the Order Limits. Offsets to ponds (30-50m), watercourses and ditches (at least 10m) are also included in the design parameters to support foraging and commuting bats by maintaining habitat networks. A broad range of habitat enhancements are recommended within the Outline LEMP [APP-199], including the creation of woodland edge habitats, creating and managing grasslands and reinstating ghost ponds. This will reduce the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing enhanced habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status.
SNC-076	Ecology and Biodiversity	8.8 In the absence of additional surveys in relation to bat roosts, it is not clear whether	For the reasons outlined in SNC-073 (above) the Applicant disagrees that a derogation licence

ID	Theme	Representation	Applicant's Response
		these will be disturbed by the proposal, and therefore whether a derogation licence under the Habitat Regulations is required, or capable of being granted given the need to maintain the favourable conservation status of Barbastelle bats. Consideration must be given to the potential for roosts outside of the order limits which could nevertheless be subject to disturbance during construction.	under the Habitat Regulations is required in order for the Scheme to proceed.
SNC-077	Ecology and Biodiversity	8.9 The Council has previously identified that a breeding population of White Clawed Crayfish in the River Tas, which remains as one of the few Norfolk strongholds for this species. The Aquatic Habitat Assessment Report [APP-160] states that White Clawed Crayfish are unlikely to be present, as no field signs were observed. However, this conclusion appears to be based on habitat suitability rather than on presence/absence surveys.	No records of white-clawed crayfish have been identified within the Order Limits. Habitat suitability survey for White Clawed Crayfish was undertaken with the findings in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160] . The Applicant notes that the habitat suitability surveys were not intended to confirm presence or absence through targeted species survey, but provided a proportionate, habitat-led appraisal at watercourse crossing locations to describe baseline aquatic habitat conditions, screen likely receptor presence/sensitivity using habitat and connectivity and identify whether further survey or more detailed assessment was required. The desk study recorded no white-clawed crayfish records within 2 km of the Order Limits in the last 10 years, no

ID	Theme	Representation	Applicant's Response
			crayfish field signs during survey, and low habitat suitability across the surveyed reaches. Measures to control pollution to watercourses are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for main rivers and watercourses to prevent pollution. Also, as per the Outline Cable Route Construction Statement [APP-216], where cables cross rivers, the Applicant is also committed to a minimum cable depth of 5m below the surveyed bed of main rivers. Trenchless solutions such as HDD will be employed when crossing the Hempnall Beck and the tributaries of the River Tas, thereby avoiding any temporary impacts upon White Clawed Crayfish populations. Notwithstanding, the Applicant notes the Examining Authority's (ExA) request for further information on this matter to be submitted at Procedural Deadline A. The Procedural Deadline A update to the Examining Authority, will explain the survey approach taken to date, why further survey work is not currently proposed, and why the Applicant considers the existing evidence base

ID	Theme	Representation	Applicant's Response
			and secured mitigation is sufficient to inform the assessment of likely effects on white-clawed crayfish.
SNC-078	Ecology and Biodiversity	8.10 As part of the assessment of operational impacts, collision risks for birds and bats (resulting in injury/death) in relation to the solar panels should be considered. The solar farm may attract birds/bats, create barriers to movement, or cause displacement which are distinct from habitat fragmentation effects arising directly from habitat loss associated with the project.	An assessment of breeding birds is provided in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. With the exception of skylarks, it was agreed with the Planning Inspectorate (ES Volume 3, Appendix 2.2 – EIA Scoping Opinion [APP-114]) to scope out impacts on breeding birds during the operational phase of the Scheme. Measures to avoid impacts on skylark and other ground nesting birds are included in ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161] and consideration of breeding birds in the long-term management of the green infrastructure of the Scheme is included in the Outline LEMP [APP-199]. The Applicant disagrees that Solar PV (in an arable landscape setting) presents a significant collision risk to birds. The Natural England publication '<i>Evidence Review of the Impact of Solar Farms on Birds, Bats and General</i>

ID	Theme	Representation	Applicant's Response
			<i>Ecology (NEER012)</i> 'states that 'incidental and informal evidence suggests that the collision risk presented by solar panels to birds is low but not impossible. It is likely that the infrastructure associated with transporting electricity (e.g. powerlines) presents more of a collision risk for birds than the solar arrays themselves'. The Scheme does not propose any significant increase in overhead lines (which are already present within Site 1 (proposed National Grid point of connection). In addition, research by scientists from the RSPB and University of Cambridge (Copping J P et al. 2025) as part of the Centre for Landscape Regeneration found that (hectare for hectare) solar farms in agriculturally dominated East Anglia contained a greater number of bird species and overall number of birds than surrounding arable farmland. With (appropriately managed) solar farms having the greatest variety of species and nearly three times as many birds compared to nearby arable farmland. Thereby, suggesting that collision risk or displacement is not a major factor in limiting bird species abundance and numbers.
SNC-079	Ecology and Biodiversity	8.11 The Outline Protected Species Mitigation Strategy (OSPMS) [APP-161] proposes that works will be undertaken	The mitigation strategy for great-crested newt set out within ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-

ID	Theme	Representation	Applicant's Response
		under a Great Crested Newt Precautionary Method Statement on the basis that the scheme is unlikely to result in a legal offence. While this is not an uncommon approach for a solar NSIP, however, the Council has concerns that it appears to address only impacts associated with site clearance and does not adequately assess impacts arising from the loss of habitat associated with permanent infrastructure, such as the substations.	161] addresses likely impacts upon GCN. This species has been assessed within Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] following surveys which are detailed in ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [APP-154]. The Applicant has considered the impacts to GCN as part of the embedded design set out in Design Principles, Parameters and Commitments [APP-213] with 50m buffers being applied to ponds which support GCN and 30m of all other ponds where GCN were absent. The 'permanent infrastructure' referred to by the Council is proposed within sub-optimal open agricultural land, land which is currently subject to intensive agricultural activities which are not conducive to supporting GCN populations. Nevertheless, such 'permanent infrastructure' is still positioned beyond 50m (often a lot further) from existing (or presumed) GCN ponds. These measures have resulted in removal of the majority of potential impact pathways to great crested newt, with any remaining being controlled via the mitigation strategy within ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161]. Should it be ascertained that a licence is required then it will be sought from Natural England in

ID	Theme	Representation	Applicant's Response
			accordance with the ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161] .
SNC-080	Ecology and Biodiversity	8.12 Buffers should be used to avoid and minimise impacts on existing ecological features such as ponds and woodlands. The Council requests that all ponds are subject to a minimum by 50 metres buffer, irrespective of the presence of Great Crested Newts, as this species may not consistently occupy the same ponds from year to year.	As a precautionary measure, the Applicant has adopted generous embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] which include for a 50m buffer zone surrounding GCN ponds and 30m surrounding ponds found not to contain GCN. Whilst it is acknowledged by the Applicant that following surveys detailed in ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [APP-154], GCN could potentially colonise additional ponds in the future, presently these are GCN negative, in many cases due to unsuitability (water depth, lack of aquatic/margin vegetation etc) and unlikely to be colonised without intervention, therefore, the Applicant proposes to maintain the current approach to pond buffers. It should be noted that the Outline LEMP [APP-199] proposes enhancements to existing ponds, the creation of new ponds, and the establishment of more suitable terrestrial habitat (improved grasslands rather than agricultural land) therefore, post-construction aquatic opportunities for GCN

ID	Theme	Representation	Applicant's Response
			will be increased, thereby contributing towards the species favourable conservation status locally.
SNC-081	Ecology and Biodiversity	8.13 Details of the proposed hedge species mix are provided in Table 3.4 of the Outline Landscape and Ecological Management Plan (OLEMP) [APP-199]. However, the Council has concerns regarding the suitability of the proposed species and their compatibility with local habitats. Goat Willow, proposed as a hedging plant does not appear to be present within on-site hedgerows and is not typically characteristic of hedgerows within the Claylands. Similarly, white Willow trees within hedges are not recorded within hedges onsite and are not representative of typical hedge trees in the Claylands landscape. The Council therefore queries whether appropriate regard has been given to 'Planting Hedges in Norfolk- Maintaining Regional Character' published by Norfolk County Council which provides guidance on suitable hedge species mixes for the South Norfolk Claylands in which the site is located.	The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline indicative planting species for each typology. These are not definitive lists, and planting schedules are not included, as these details will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032]. The Applicant notes the comments and will include an updated indicative species for hedgerows in the Outline LEMP [APP-199] at Deadline 1.
SNC-082	Ecology and Biodiversity	8.14 As part of the Long Stratton Bypass, additional water bodies were created as part of the landscaping scheme between 2024 and 2025. Although these water bodies are	The Applicant acknowledged this request and requested access to these ponds from SNC, however, access was denied/not provided. Further HSI assessments of these ponds can be

ID	Theme	Representation	Applicant's Response
		recently established, there remains a likelihood that Great Crested Newts may be present. The Council therefore seeks confirmation from the applicant that these ponds will be included in the 2026 survey season. 8.15 The impact assessment for Great Crested Newts uses eDNA survey data from 2019, 2020, 2023 and 2024. However, given the passage of time, the data from 2019 and 2020 are now too old to be relied on for determination purposes, and the data from 2023 is of borderline age.	undertaken, and if found to optimal habitat, using a precautionary approach, GCN could be assumed to be present. However, it should be noted that if these ponds were created as flood elevation basins/SUDS features, then GCN presence is considered to be highly unlikely. Whilst relatively recent, the Applicant acknowledges that 2019 and 2020 data relied on in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] could be considered historic, whilst acknowledging that if access has not been formerly provided to these ponds, then this desk study data is the most reliable data presently available. Therefore, the Applicant is of the view that 2019 and 2020 results should be considered reliable, as these represent credible survey results, albeit, received from a small number of years ago. It should be noted that information regarding GCN presence in the landscape has been augmented by detailed surveys commissioned by the Applicant and which are presented in ES Volume 3, Appendix 8.3 – Great Crested Newt Survey Report [APP-154]. The Applicant is also satisfied that the inclusion of embedded mitigation to include a 50m buffer from ponds known to support GCN, and a 30m buffer where GCN presence has not been confirmed will

ID	Theme	Representation	Applicant's Response
			benefit this species regardless of the age of historic data. These embedded measures set out in the Design Principles, Parameters and Commitments [APP-213] are also reinforced by appropriate safeguards included in the Outline CEMP [APP-196], Outline LEMP [APP-199] and Outline DEMP [APP-198] such that impacts to GCN will be avoided.
SNC-083	Ecology and Biodiversity	8.16 Cable Route Corridor 7 passes through Fritton Grange Meadows County Wildlife Site (CWS) which contains lowland fen habitat. The crossing is proposed to be undertaken using HDD (minimum 5m below the riverbed) below existing peat deposits. A 30m buffer to the CWS and Hempnall Beck is proposed to avoid impacts during construction and operation. However, the thermos-resistivity assessment should be used to inform and substantiate the conclusion that heat generated by the cables will not adversely impact this irreplaceable habitat. Accordingly, it is requested that Chapter 9- Water Environment [APP-045] specifically considers impacts on lowland fen as an irreplaceable habitat and Fritton Grange Meadows CWS.	The Applicant has considered potential impacts on Fritton Grange Meadows County Wildlife Site (CWS) and Hempnall Beck within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. With the embedded design principles adopted and detailed in the Design Principles, Parameters and Commitments [APP-213], no adverse effects are anticipated on either site. As noted in the Applicants response to the Environment Agency Relevant Rep (EA-030). The Applicant acknowledges that additional evidence may be provided to support the conclusion that thermal effects from buried high-voltage electrical cables are unlikely to result in significant effects on groundwater receptors, including Groundwater Dependent Terrestrial Ecosystems (GWDTEs), peat deposits and other sensitive hydrogeological features.

ID	Theme	Representation	Applicant's Response
			To address this, the Applicant will undertake additional desk-based risk assessment in accordance with the process described in the Informative to EA30 provided by the EA. In relation to the Informative, during the meeting with the EA on 19/08/26 the EA clarified that where the Informative states "in the first instance, the developer should ensure that where practicable the proposed cabling... does not cause pollution of surface water and groundwater" should be read as <i>"...where practicable the proposed cabling... does not cause pollution of surface water and groundwater (other than heat)"</i>. The Applicant notes that thermal effects are only relevant during the operational phase, as the cables will not be energised during construction and will be de-energised prior to decommissioning. Any mitigation measures identified through the thermal, hydrogeological or ecological assessments will be incorporated into the detailed cable design and secured through the final Outline OEMP. Where relevant, the Outline CEMP will also be updated to reflect any design or construction requirements arising from the assessment process.
SNC-084	Ecology and Biodiversity	8.17 Following mitigation secured through DCO requirements, impacts on ecological	The Applicant agrees that following the mitigation measures secured through DCO requirements

ID	Theme	Representation	Applicant's Response
		receptors are predicted to be negligible or minor adverse. While these effects may influence individual receptors, they are not expected to compromise overall ecological integrity or conservation status.	(and provided in outline form within the Draft DCO [AS-032] submission) there will be no expected compromise in overall ecological integrity or conservation status.
SNC-085	Cumulative Schemes, In-Combination and Cumulative Impact	9.1 The Council notes a concentration of large-scale energy infrastructure proposals and consents within South Norfolk and the wider Norwich area. These schemes must be considered in terms of their cumulative and in-combination effects as required by the EIA Regulations and the Planning Act 2008, including: 9.1.1 Tasway Energy Park – 700MW Solar and Battery Energy Storage System (BESS) NSIP (Project Paused following Phase One consultation). 9.1.2 Norwich to Tilbury Overhead Lines Project- Installation of pylons and new 400kV overhead lines NSIP (currently in examination) 9.1.3 Consented and proposed TCPA renewable energy schemes in the vicinity of the site of this project. 9.1.4 Offshore wind projects and associated infrastructure:	The Applicant is aware of other projects in the region. The technical chapters of ES Volume 1 [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. With regards to the Tasway Energy Park, the applicant has sought to assess all cumulate schemes in accordance with <i>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017</i> (the EIA Regulations) and the Planning Inspectorate's <i>Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment</i>. The EIA Regulations require the assessment to take into account '<i>the cumulation of effects with other existing and/or approved projects...</i>' (Schedule 4, paragraph 5(e)) and the same is required by the Planning Inspectorate's <i>Advice on Cumulative Effects Assessment</i>.

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		9.1.4.1 Orsted Hornsea Project Three Offshore Windfarm NSIP cable routes and converter station northwest of Norwich Main; 9.1.4.2 Equinor Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects (SEP and DEP) cable routes and converter station south of Norwich Main; 9.1.4.3 Three consented National Highways schemes for works around Norwich.	The Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorates website as a DCO project. Should the Tasway Energy Park project ever proceed, the cumulative effects of the East Pye Solar and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance. The Statement of Need [APP-206] describes how and why the Scheme addresses all relevant aspects of government policy which support the rapid deployment of low carbon electricity generation at scale, and explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of suitable and available land, suitable irradiation and grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme The Clean Power 2030 Action Plan (2024) paves the way for new strategic plans for development of the GB energy system. The Connections Action Plan (2023) is clear that NESO's Connections Reform process and NESO's longer term strategic network and system planning processes must be aligned to ensure the overall network remains optimally planned. It is therefore expected that

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			NESO's strategic plans build upon their own connections queue prioritisations to deliver coherent and consistent recommendations to deliver the Clean Power target on the way to achieving net zero. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders to understand and, where possible, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination.
SNC-086	Cumulative Schemes, In-Combination and Cumulative Impact	9.2 The Council is concerned that the cumulative and in combination effects of these Projects, together with existing infrastructure, will result in: 9.2.1 Landscape and Heritage Harm arising from the introduction of industrial scale infrastructure incompatible with rural character;	See response to SNC-085. The technical chapters of ES Volume 1 [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. ES Volume 1, Chapter 11 – Transport and Access [APP-047], includes the internalisation of construction haul routes, where possible, to minimise impacts. Measures also include the use

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		9.2.2 Ecological Impact as a result of potential loss and fragmentation of habitats and effects on biodiversity. 9.2.3 Community Disruption due to noise, disturbance and disruption during construction and operation phases; 9.2.4 Economic Consequences, including potential negative impacts on local businesses and tourism. 9.3 The overlapping construction programmes, likely to extend over a number of years rather than months, will exacerbate these cumulative and in-combination effects. 9.4 Additional anticipated impacts include: 9.4.1 Movement of abnormal loads requiring road closures; 9.4.2 Road widening and associated loss of hedgerows and trees.	of a vehicle booking system and vehicle holding areas to proactively manage construction vehicle movements to site and ensure impacts on the rural and local road network is reduced where practicable, as described in the Outline CTMP [APP-201]. The proposed access strategy has been designed and developed in consultation with Norfolk County Council as the Local Highway Authority. Highway Works will support the safe movement of construction vehicles along narrower sections of the local road network and reduce potential disruption to the public highway. The Highway Works will contain localised improvements to deteriorated road edges or temporary highway and traffic works. Highway Works that have provisionally been identified where the AIL may overrun or oversail are identified in the Outline CTMP [APP-201], along with the likely and suitable access routes to the Scheme. Site access design, vehicle tracking and swept-path analysis has also been undertaken to assess the suitability of access as included in Appendix C of the ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 - APP-177]. Mitigation measures are also set out in the Outline CTMP [APP-201] to reduce, as far as practicable, the impacts of the Scheme on the local road

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			network. In accordance with Requirement 15 of the Draft DCO [AS-032] a detailed CTMP will be submitted to and approved with the relevant planning authority that must consult with the relevant highway authority. An assessment of cumulative developments has been provided in ES Volume 1, Chapter 11 – Transport and Access [APP-047] in accordance with industry-standard IEMA Guidance. The cumulative development list with respect to traffic and transport has been prepared in consultation with Norfolk County Council as the Local Highway Authority.
SNC-087	Cumulative Schemes, In-Combination and Cumulative Impact	9.5 South Norfolk Council therefore urges the Examining Authority to: 9.5.1 Require comprehensive mitigation measures to address landscape, heritage, ecological and community impacts including those arising from cumulative and in-combination effects; 9.5.2 Ensure that construction phasing and traffic management plans are coordinated to minimise disruption to residents and businesses, having regard to the interaction between multiple schemes.	The Applicant refers to its response to SNC-085 and SNC-086.

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SNC-088	Cumulative Schemes, In-Combination and Cumulative Impact	9.6 The Council acknowledges that there are national benefits with the delivery of these projects. However, these benefits are achieved at the expense of substantial local harm. Given the scale of identified impacts, the Council considers that significant weight should be afforded to heritage, visual, ecological and local amenity harms in the planning balance.	The Applicant acknowledges that there will be some unavoidable significant impacts on the environment as a result of the Scheme. The Applicant has assessed the likely significant effects in the ES [APP-042 to APP-056] and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans are secured via the Requirements contained within Schedule 2 to the Draft DCO [AS-032]. The planning balance considering the positive, neutral and negative impacts are set out in the Planning Statement [APP-209]. The Secretary of State will balance those potential impacts taking in to account the substantial benefits of the Scheme, including the contribution to Clean Power 2030, and localised benefits to biodiversity, green infrastructure strategy, and employment and training.
SNC-089	The Applicant	9.7 The Council remains committed to working pro-actively with the applicant as the application progresses through Examination with a view to resolving outstanding issues, particularly in relation to the precise drafting of requirements.	The Applicant welcomes SNC's commitment to pro-active engagement and confirms it will continue to engage constructively on the drafting of Requirements within Schedule 2 of the Draft DCO [AS-032] through the Examination and Statement of Common Ground.

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SNC-090	Discharge of Requirements	Schedule 2 (Requirements) and Schedule 15 (Procedure for Discharge] 10.4.1 Future Governance Changes: Norfolk is part of the accelerated Local Government Review, meaning the current two-tier system will likely be replaced by unitary authorities before requirements are discharged. Wording must be future-proofed; 10.4.2 Discharge Authority: The Council recommends that the Local Planning Authority be designated as the discharge authority for all planning-related matters.	The Applicant notes this comment and will continue to pro-actively engage with the SNC on the wording of the Draft DCO [AS-032] .
SNC-091	Discharge of Requirements	10.5 The Council has already engaged with the applicant and will continue to do so regarding the wording of the Requirements set out in Schedule 2 to the draft DCO. The Council recognises that these provisions may be subject to further revision. The Council reserves the right to comment further on the schedules and provisions within the DCO.	The Applicant notes this comment and welcomes on-going dialogue with Council in regard to the wording of the DCO. As a consequence of this on-going dialogue, the Applicant has already made updates to the Draft DCO [AS-032] submitted into the Examination in their full response to Section 51 advice.
SNC-092	Discharge of Requirements	Requirement 1 – Interpretation 11.1 The Council notes that, in light of Local Government Review (LGR), South Norfolk District Council is unlikely to remain the	The Applicant has addressed this representation by updating the wording in Requirement 1 of the Draft DCO [AS-032] to include “or its successor in function as the relevant planning authority”.

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		named Local Planning Authority (LPA) responsible for discharging these Requirements. The drafting should therefore be amended to future-proof the provision and reflect potential governance changes.	
SNC-093	Discharge of Requirements	Requirement 3 – Approved Details and Amendments 12.1 The Council notes that no clear procedure is set out for the submission or approval of amendments under this Requirement. It is unclear how such amendments are to be made (including whether they must be submitted in writing), and the drafting does not provide a robust or transparent mechanism.	The full procedure in respect of the discharge of Requirements is set out in Schedule 15 (Procedure for discharge of requirements) to the Draft DCO [AS-032] . That Schedule, in combination with Requirement 3, provides a robust and transparent mechanism.
SNC-094	Discharge of Requirements	Requirement 4 – Community Liaison Group 13.1 The Council considers that this Requirement should be reworded to require details to be “submitted to and approved by the relevant planning authority.” The current drafting is ambiguous as to whether approval is required prior to commencement, or whether submission alone is sufficient to discharge the Requirement.	Sub-paragraph (1) of Requirement 4 states that “Prior to the commencement of the authorised development the undertaker must submit to the relevant planning authority for approval the terms of reference for a community liaison group”. This makes clear that the terms of reference are subject to approval and that such approval must be pre-commencement. In addition, sub-paragraph (2) of Requirement 4 provides that “the community liaison group must be established prior to commencement of the authorised development”. Practically, this therefore

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			requires the terms of reference to be approved prior to the commencement of the authorised development to allow the community liaison group to be established. This follows the approach in recently made solar DCOs including The Springwell Solar Farm Order 2026 and The Fenwick Solar Farm Order 2026.
SNC-095	Discharge of Requirements	Requirement 5 – Detailed Design 14.1 The Council notes that this Requirement does not include Works Nos. 4A and 4B relating to the proposed National Grid substation. Clarification is requested, for the avoidance of doubt, as to whether these works will be undertaken separately by National Grid and whether detailed design approval will instead be secured through a separate TCPA planning application.	The Draft DCO [AS-032] provides consent for Work Nos. 4A and 4B to be undertaken by either the Applicant or National Grid. Article 36(1) of the Draft DCO [AS-032] sets out the general position that the provisions of the Order have effect solely for the benefit of the undertaker (i.e. East Pye Solar Limited, the Applicant). However, Article 36(2) confirms that the provisions in respect of Work No. 4 (new National Grid substation) and Work No. 5 (works in connection with the existing overhead transmission electric line) are for the benefit of the undertaker and National Grid. As explained in ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215], the grid connection offer received from NESO, working with NGET, contracted the Applicant to provide the land and to gain consent

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			for the proposed new National Grid Substation, which was accepted by the Applicant. Pursuant to that offer, the Applicant is seeking a consent which facilitates the delivery of the new National Grid substation such that a separate TCPA 1990 application for the National Grid works is not required. However, should NGET wish to develop an alternative design then they would be able to make a separate TCPA planning application. The Applicant has updated the drafting of Requirement 5 to ensure that no part of Work No. 4 may commence until details have been submitted to and approved by the relevant planning authority. The details submitted must accord with the design principles, parameters and commitments.
SNC-096	Discharge of Requirements	Requirement 6 – Battery Safety Management 14.3 The Council considers that sub-paragraph (1) should be amended to refer to approval by the “relevant planning authority in consultation with” the consultees listed in subparagraph (3), rather than separating these provisions across different subparagraphs.	The Applicant does not consider any amendment to be necessary. The Requirement already secures the need for approval (sub-paragraph (1)) and such approval to be in consultation with named consultees (sub-paragraph (3)). The drafting follows the approach in recently made solar DCOs including The Springwell Solar Farm Order 2026 and The Fenwick Solar Farm Order 2026.

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SNC-097	Discharge of Requirements	Requirement 7 – Landscape and Ecology Management Plan (LEMP) 15.1 The Council considers that the relevant statutory nature conservation body should be clearly identified in sub-paragraph (1). In this instance, this would fall to Natural England.	The existing drafting of "the relevant statutory nature conservation body" is considered to be most appropriate and aligns with DCO precedent. At the moment, this has the effect that Natural England is covered as the named consultee, although the broader reference to the 'statutory nature conservation body' is used to address the potential scenario of Natural England ceasing to exist or having its functions devolved. The use of "statutory nature conservation body" is Natural England's preferred drafting.
SNC-098	Discharge of Requirements	Requirement 8 – Protected Species Mitigation Strategy 16.1 The Council considers that the relevant statutory nature conservation body should be clearly identified in sub-paragraph (1), which would include Natural England. Clarification is also requested as to whether approval of this Requirement would remove the need for subsequent licensing from Natural England (e.g. for bats and Great Crested Newts), or whether further approvals would still be required.	The existing drafting of "the relevant statutory nature conservation body" is considered to be most appropriate and aligns with DCO precedent. At the moment, this has the effect that Natural England is covered as the named consultee, although the broader reference to the 'statutory nature conservation body' is used to address the potential scenario of Natural England ceasing to exist or having its functions devolved. The use of "statutory nature conservation body" is Natural England's preferred drafting. Requirement 8 will not remove the need for any protected species licensing from Natural England. The ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161] sets out where licences may be required.

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SNC-099	Discharge of Requirements	Requirement 9 – Biodiversity Net Gain (BNG) 17.1 The Council considers that the BNG baseline should reflect the current condition of the site. There is concern that the baseline may not be agreed prior to pre-commencement works being undertaken. The Requirement should therefore be amended to ensure that the baseline is secured and agreed before any works that could affect it take place.	Requirement 9(1) in the draft DCO [AS-32] states, <i>'No part of the authorised development may commence until a biodiversity net gain strategy for that part has been submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body.'</i> Requirement 9(2) requires the final biodiversity net gain strategy to include details of the statutory metric used to calculate the baseline and post-construction habitat values. The statutory metric and accompanying guidance set out the position regarding the appropriate baseline data age/reliability. All baseline data within the Order Limits has been calculated, following from detailed habitat condition assessments undertaken between 2024 and 2026, and therefore, all pre-commencement baseline data calculations are complete. In the unlikely event that habitat clearance permitted by the DCO takes place before the submission of the final biodiversity net gain strategy then this previously calculated baseline data will be used to ensure the baseline calculations adopt the biodiversity value of habitats within the Order Limits prior to the clearance activities taking place, as standard.
SNC-100	Discharge of Requirements	Requirement 12 – Archaeology 18.1 The Council considers that discharge of this Requirement would be undertaken in	Sub-paragraph (1) of Requirement 12 relates to the carrying out of programmed archaeological investigations as set out in the archaeological

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		consultation with the Historic Environment Service, and this should therefore be reflected in the wording of sub-paragraph (1).	mitigation strategy submitted with the DCO application. As this strategy is already in its final form it does not provide for the relevant planning authority's approval and therefore Historic England would not need to be consulted. Sub-paragraph (2) of Requirement 12 requires a written scheme of investigation (WSI) to be submitted and approved. The WSI must be substantially in accordance with the ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [APP-173]. The Applicant does not consider that it is necessary to require consultation with Historic England but notes that Historic England will provide its comments on Requirement 12 in its Written Representation.
SNC-101	Discharge of Requirements	Requirements 13 and 14 – Construction and Operational Environmental Management Plans 19.1 The Council considers that discharge of these Requirements would require consultation with the Environment Agency, the Local Highway Authority, and Natural England. This should be explicitly included in the wording of sub-paragraph (1).	Norfolk County Council, as the relevant Highway Authority, is a named consultee in respect of Requirements 15 and 16 and these are the relevant construction and operational management plans relating to highways matters. Natural England is a named consultee in respect of Requirements 7, 8, and 9 which are the relevant management plans relating to ecological matters. The Applicant does not consider it necessary to add them as named consultees for Requirements 13 and 14.

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			The Environment Agency is specified as a consultee in sub-paragraph (3) of Requirement 13.
SNC-102	Discharge of Requirements	Requirements 15 and 16 – Construction and Operational Traffic Management Plans 20.1 The Council considers that sub-paragraph (1) should refer to approval by the “relevant planning authority in consultation with” the Local Highway Authority, rather than separating consultation and approval into different sub-paragraphs.	The Applicant does not consider any amendment to be necessary. These Requirements already secure the need for approval (sub-paragraph (1)) and such approval to be in consultation with named consultees (sub-paragraph (3)).
SNC-103	Discharge of Requirements	Requirement 17 – Public Rights of Way 21.1 The Council considers that sub-paragraph (1) should refer to approval by the “relevant planning authority in consultation with” the Local Highway Authority, for consistency and clarity.	The Applicant does not consider any amendment to be necessary. This Requirement already secures the need for approval (sub-paragraph (1)) and such approval to be in consultation with named consultees (sub-paragraph (3)).
SNC-104	Discharge of Requirements	Requirement 18 – Soil Management Plan 22.1 The Council considers that discharge of this Requirement should include “in consultation with” Natural England and this should be reflected in the wording of subparagraph (1).	The Applicant will consider any request from Natural England to be included as a consultee.

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SNC-105	Discharge of Requirements	Requirement 19 – Skills, Supply Chain and Employment 23.1 The Council considers that discharge of this Requirement should include “in consultation with” Norfolk County Council and that this should be reflected in the drafting of sub-paragraph (1).	The Applicant will consider any request from Norfolk County Council to be included as a consultee.
SNC-106	Discharge of Requirements	Requirement 20 – Site Waste Management 24.1 The Council considers that discharge of this Requirement should include “in consultation with” Norfolk County Council (in its capacity as Minerals and Waste Authority), and this should be clearly reflected in the wording.	The Applicant will consider any request from Norfolk County Council to be included as a consultee.
SNC-107	Discharge of Requirements	Schedule 15 – Procedure for Discharge of Requirements 25.1 Paragraph 5 – Fees 25.1.1 The Council does not agree with the proposed fees for the discharge of requirements. The Council considers that these should align with the national fee schedule, consistent with other NSIP Development Consent Orders with which the Council has experience.	The fees identified in Schedule 15 are taken from Schedule 1 of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. Specifically, the fee for the first application for the discharge of requirements in paragraph 5(2)(a) corresponds with item 11(2) in the scale of fees in Part 2 of the Schedule, relating to operations not coming within the other categories listed. The fee identified is £293 per 0.1 hectare subject to a maximum of £2,535.

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			The fee in paragraph 5(2)(b) for subsequent applications for discharge of £578 corresponds with the fee in paragraph 4 of Schedule 1, being the fee payable where an applicant has previously applied for the approval under the same outline planning permission, a scenario that mirrors that envisaged by paragraph 5(2)(b). The fee in paragraph 5(2)(c) is a general administrative fee, in recognition that the applications made for approval as required by detailed management plans will be targeted and limited in scope. The Applicant notes that since the DCO Application was submitted, the relevant planning authority is now able to recover costs relating to any relevant service (as defined in s54A(2) of the Planning Act 2008) pursuant to the Infrastructure Planning (Fees) Regulations 2010. This includes costs relating to the discharge of requirements. The Applicant can remove the application fee in Schedule 15 and the Council can rely on the Infrastructure Planning (Fees) Regulations 2010 if preferred.
SNC-108	Legal	Further comments on Articles of the DCO 26.1 The Council may wish to provide further comments on other Articles of the DCO; however, it reserves its position	The Applicant notes this comment.

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		pending submission of a potentially revised draft DCO and will address these matters further within its Local Impact Report.	
SNC-109	Noise and Vibration	1.2 Executive summary - The assessment framework broadly follows recognised standards (e.g. BS 5228, BS 4142, DMRB LA 111) and adopts appropriate metrics such as LOAEL and SOAEL. - However, there are significant gaps in the transparency and justification of the prediction methodologies for construction noise, vibration, and operational noise modelling. - Further information is required in several key areas before SNC can be satisfied that policy requirements are met.	ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179] provides details of the calculation methodologies adopted within the assessment.
SNC-110	Noise and Vibration	NOISE RELATED PLANNING POLICY National Planning Policy The Environmental Statement (ES) states that the primary policy tests that the applicant will be assessed against are as follows:	The concept of NOAELs, LOAELs and SOAELs have been applied to the assessment presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] . Noise impacts above the SOAEL are demonstrated to be avoided or reduced as far as practicable. Noise impacts above the LOAEL are demonstrated to be minimised and mitigated.

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		• Overarching NPS for Energy (EN-1) • NPS for Renewable Energy Infrastructure (EN-3) • NPS for Electricity Networks Infrastructure (EN-5) These policies, and other relevant national planning policy, all refer to principles set out in the Noise Policy Statement for England (NPSE). The Noise Policy Statement for England (NPSE) published by DEFRA in March 2010 sets out the Government's policy on noise, which is: <i>“to promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development.”</i> The NPSE also introduces concepts from toxicology currently being applied to noise impacts by the World Health Organisation. These are: • NOEL – No Observed Effect Level: This is the level below which no effect can be detected. • LOAEL – Lowest Observed Adverse Effect Level: This the level above which	

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		adverse effects on health and quality of life can be detected. • SOAEL – Significant Observed Adverse Effect Level: This is the level above which significant adverse effects on health and quality of life occur. In simple terms, the policy tests set out in the NPSE are that: • Noise impacts which exceed an agreed SOAEL threshold would not normally be permitted. • Adverse noise impacts (which are between agreed thresholds for SOAEL and LOAEL) would only normally be permitted when the impacts are shown to be minimised through appropriate mitigation. • Any noise impacts which are below an agreed threshold for LOAEL would be normally deemed acceptable, in planning terms, without need for additional mitigation.	
SNC-111	Noise and Vibration	2.2 Local Planning Policy The ES references Policies 2 and 3 of the Greater Norwich Local Plan. In addition to this, the current South Norfolk Local Plan	The Applicant's position is that the Scheme provides a reasonable standard of amenity reflecting the character of the local area, and does not introduce incompatible neighbouring uses. The

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		(2015) includes Policy DM 3.13, which states that: Policy DM 3.13 Amenity, noise and quality of life Development should ensure a reasonable standard of amenity reflecting the character of the local area. In all cases particular regard will be paid to avoiding: <i>a. Overlooking and loss of private residential amenity space</i> <i>b. Loss of day light, overshadowing and overbearing impact</i> <i>c. Introduction of incompatible neighbouring uses in terms of noise, odour, vibration, air, dusts, insects, artificial light pollution and other such nuisances.</i> <i>Planning permission will be refused where proposed development would lead to an excessive or unreasonable impact on existing neighbouring occupants and the amenity of the area or a poor level of amenity for new occupiers.</i>	Scheme will not lead to excessive or unreasonable impact on neighbouring occupants; and will not lead to noise which would be significantly detrimental to the amenity of noise sensitive receptors. The assessment of noise is presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The following commitments are included in the Outline OEMP [APP-197]: - Noise from the BESS will achieve the predicted sound levels in ES Volume 1: Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on ProWs will not exceed 55 dBA. Based on these commitments, appropriate mitigation measures are secured and will be implemented. The policy compliance of the Scheme with local planning policy is addressed in the Policy Compliance Document [APP-210]. The noise and vibration assessment in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] has

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		<i>(2) In considering applications which may result in an increase in noise exposure, account will be taken of the operational needs of the proposed and neighbouring businesses, the character and function of the area including background noise levels at different times of day and night and the need to protect areas of rural tranquillity.</i> <i>(3) Development will not be permitted where the proposed development would generate noise or artificial light which would be significantly detrimental to the amenity of nearby residents or the occupants of other noise sensitive uses. Proportionate mitigating measures including limiting conditions will be used to reduce the potential noise or artificial light impact to an appropriate level whenever practical to do so.</i>	had regard to the character and function of the area, including areas of rural tranquillity, and mitigation is secured through the Outline CEMP [APP-196] and Outline OEMP [APP-197].
SNC-112	Noise and Vibration	3.1 Criteria The limits in Table E.1 of British Standard BS 5228-1:2009+A1:2014 (commonly known as the 'ABC methodology') are widely used, and in our opinion are justifiable. Note that the noise levels measured by the Applicant's consultant are reported in terms of daytime (07:00 to 23:00hrs) and night-time (23:00-07:00hrs)	The core construction working hours do not encroach into the evening period and therefore assessment of this period is not required for construction noise. The core working hours are set out in Section 2.3 of Outline CEMP [APP-196]. HDD noise and vibration have been assessed on the basis that it could be required to be undertaken continuously over a night-time period within ES

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		and the above threshold levels are defined in terms of day, evening and night-time periods. This means that additional analysis may be required to determine ambient noise levels if construction works are expected to take place between 19:00 and 23:00hrs. Section 15.5.56 of the ES states that "Based on guidance provided within BS 5228-1 (Ref 12-20), significant effects due to construction and demolition activity noise could occur when major or moderate effects are anticipated to exceed: • A period of 10 or more days of working in any 15 consecutive days; or • For a total number of days exceeding 40 in any 6 consecutive months." The wording of this statement refers to "significant effects" rather than exceedances of specific noise thresholds. This suggests that the time criteria are intended to apply at the EIA significance stage, rather than directly to exceedances of the defined SOAEL and LOAEL thresholds.	Volume 1, Chapter 12 – Noise and Vibration [APP-048].
SNC-113	Noise and Vibration	Question 1 – Confirm whether it is the Applicant's intention that the duration criteria set out in Section 15.5.56 are applied only in determining the significance of effects, or whether they are also intended to apply to	The intention is for the duration criteria to be applied in determining the significance of effects. It is considered that the LOAEL and SOAEL thresholds would be unchanged, as resultant construction noise levels of this magnitude are still likely to have effects on occupants such as closing

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		exceedances of the SOAEL and LOAEL thresholds.	windows to reduce noise levels, or to raise their voice if outside.
SNC-114	Noise and Vibration	3.2 Prediction methodology Appendix 12.2 Noise Modelling And Calculations states that the construction noise levels were predicted using the source data and methodology set out in British Standard BS 5228- 1:2009+A1:2014 and provides a list of sound power data in Table 2.1. However, the document does not provide any description of the calculations which would allow a reviewer to validate the results. Question 2 – Provide a detailed description of the calculation methodology used to predict construction noise levels at the receptors. This should include a commentary of the assumptions used (number and location of sources), and any relevant modelling parameters (e.g. temperature, attenuation factors, barriers), and examples of specific calculations.	The assessment methodology is outlined in ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]. The calculation methodology used is based on the methodology set out in Annex F of BS 5228-1:2009+A1:2014. Soft ground has been assumed, and screening has not been considered. As noted in ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179], access road works and PV panel installation have been assumed to occur at the closest practicable location within the Order Limits boundary. Works associated with the National Grid Substation, Project Substations and BESS are assumed to take place at the closest practicable location within their works areas. Overall sound power data for each stage of construction is included in the appendix, based on sound power levels of individual items of equipment used.
SNC-115	Noise and Vibration	3.3 Assessment 3.3.1 Noise from construction of Project Substations, National Grid Substation, BESS, Solar PV Arrays Table 12-18 of the ES states that construction noise levels are predicted to	Overall, it is expected that 3MWp worth of piling works will be completed a day. This is a learning from the Applicant's consented West Burton project. As such the expected duration of works which exceed SOAEL and LOAEL will be short in

ID	Theme	Representation	Applicant's Response
		exceed SOAEL at 1 receptor (NSR29) and exceed the LOAEL at 44 receptors. Paragraphs 12.8.10 to 12 state that the exceedances of the SOAEL and LOAEL are not expected to be significant because they do not exceed a "temporal threshold" (see Question 1). Question 3 – Please confirm the expected duration of the works which give rise to the predicted exceedances of the SOAEL and LOAEL.	duration and far below the threshold for short-term impacts of 12 months. For example, a typical 50MWp site will take 3 working weeks to complete piling works. The remainder of works will be longer in duration, but still below the threshold for short-term works.
SNC-116	Noise and Vibration	3.3.2 Noise from Access Roads Section 12.8.13 of the ES highlights that noise from construction access roads is predicted to exceed the SOAEL within 30m of the access roads, but is not significant as it is "unlikely" that access roads will be this close to receptors. We note that Table 2.2 of Appendix 12.2 Noise Modelling And Calculations shows that noise levels within 100m of any access roads are predicted to exceed 55 dB Laeq,T, which will exceed the existing ambient noise level (LOAEL) in almost all cases. Question 4 – Confirm how many receptors will be within 30m and 100m of the proposed access roads and are therefore	The assessment of noise is presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The assessment concludes that noise generated from the construction of access tracks is not expected to be above the SOAEL as no receptors are expected to be within 30m, and therefore is not expected to be significant. The locations of access roads have not been confirmed at this stage and will be addressed at the detailed design stage. The Applicant will take in to consideration the design and location of access points having regard to the proximity to existing dwellings.

ID	Theme	Representation	Applicant's Response
		expected to be subject to noise levels which exceed the SOAEL and LOAEL. Please also confirm the expected duration of the works will give rise to these exceedances.	
SNC-117	Noise and Vibration	3.3.3 Noise from Horizontal Directional Drilling (HDD) Table 12-19 states that HDD works for the cable route will exceed the SOAEL at 1 receptor and the LOAEL at 15 receptors during the daytime, and will exceed the SOAEL at 15 receptors and the LOAEL at 3 receptors at night. The ES states that HDD operations will take place over 1-2 days but it's not clear if the Applicant's position is that HDD works will occur only in the daytime or will be continuous through the day, evening and night-time periods. We note that the evening period is not assessed. Question 5 – Confirm the circumstances that the HDD operations are expected to run continuously for 24-hour periods.	Horizontal Directional Drilling (HDD) activities may need to be undertaken continuously over 1-2 days or longer to ensure the safe and successful completion of the drill. Interruptions can increase the risk of borehole instability, drilling fluid settlement, equipment becoming stuck within the bore, and potential failure of the installation. Boreholes will be undertaken to determine the ground Strata, once established a duration will be determined. A worst- case scenario has been assumed accounting for possible nighttime HDD. If there is a requirement to work outside of normal working hours (i.e. for HDD and or emergency works), this will be controlled through the prior approval process in Section 61 of Control of Pollution Act via SNC. This will be based on the specific construction activities that are required for evening and/or night-time periods. The anticipated effects from HDD are expected to be short-term, negligible to major adverse, which are not significant due to the temporal nature of the work.

ID	Theme	Representation	Applicant's Response
SNC-118	Noise and Vibration	3.4 Mitigation and policy tests The predicted construction noise levels exceed SOAEL and/or LOAEL at many receptors. This appears to fail the NPSE's policy test to avoid noise impacts which exceed the SOAEL and demonstrate that impacts which exceed LOAEL are minimised through appropriate mitigation. However, we note that the predicted levels do not include the effects of screening or other mitigation, and the report does not discuss the duration over which construction noise is expected to occur (see Question 1). Question 6 – Confirm what specific construction noise mitigation measures are proposed, and the residual noise impacts once these mitigations measures have been accounted for. Then please clarify the Applicant's position on compliance with the NPSE's policy test to avoid noise impacts which exceed the SOAEL and demonstrate that impacts which exceed LOAEL are minimised through appropriate mitigation.	The assessment indicates that: - One receptor (NSR29, commercial facilities on Bungay Road) is expected to experience construction noise levels which are above the SOAEL during piling works for Solar PV. Due to the anticipated duration of exposure, this is not considered to be a significant effect. 16 properties are expected to experience construction noise levels which are above the SOAEL during HDD works. Due to the anticipated duration of exposure, this is not considered to be a significant effect. Noise and vibration mitigation measures are outlined within Table 3.7 of the Outline CEMP [APP-196]. This includes all construction activities (including trenchless crossings). Despite including best practicable means to mitigate and minimise construction noise impacts (in accordance with the NPSE), temporary exceedance of the SOAEL may occur. The Outline CEMP [APP-196] notes that a construction noise monitoring scheme will be developed and agreed with the relevant planning authority following appointment of a Contractor and prior to commencement of construction works.

ID	Theme	Representation	Applicant's Response
SNC-119	Noise and Vibration	TRAFFIC NOISE (CONSTRUCTION AND DECOMMISSIONING) 4.1 Criteria The proposed construction traffic noise thresholds are set out in Table 12-10 of the ES as follows: These criteria are taken directly from Table 3.2 of the Design Manual for Roads and Bridges LA 111 and are justifiable, in our opinion.	The Applicant acknowledges this comment.
SNC-120	Noise and Vibration	4.2 Predictions The ES states in Section 12.8.26 that "The likely change in road traffic noise levels as a direct result of the construction of the Scheme have been determined by comparing the predicted sound levels for the future baseline scenarios, with the future baseline plus construction traffic scenarios, based on traffic flow information provided by the Transport Consultant. Traffic noise levels are calculated from the future baseline traffic conditions." This is an appropriate method of assessing the relative change in traffic noise levels due to construction activities. However, the threshold are determined in terms of absolute levels which means that the	The assessment indicates 26 roads with a negligible impact, three roads with a low impact and one road with a medium impact. The absolute noise levels for the road experiencing a medium impact (Fairstead Lane) are presented in paragraph 12.8.29 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The absolute noise level would not change the outcome of the assessment for roads which experience a negligible impact. The three roads which experience a low impact are: • Shotesham Road; • Bussey's Loke; and • Market Lane. In the worst-case, the Basic Noise Level at 10 m from Shotesham Road (with flows of up to 230

ID	Theme	Representation	Applicant's Response
		predicted changes in traffic noise levels cannot be compared against these. Question 7 – Provide the results in Table 12-20 of the ES in terms of absolute noise levels (façade incident during the day and equivalent free field at night) so they can be compared against the threshold criteria set out in Table 12-10 of the ES.	AAWT 18 hour, with 23% HGV, travelling at 60mph) is 53 dB $L_{A10,18\text{hour}}$. Based on this, the SOAEL is not expected to be exceeded, and it is considered the impacts/effects identified do not require change.
SNC-121	Noise and Vibration	4.3 Assessment, mitigation and policy tests Section 12.8.30 of the ES states that construction traffic noise levels are not expected to exceed LOAEL. This would suggest that noise levels from construction traffic are acceptable in policy terms, without the need for additional mitigation measures. This is plausible but requires the results to be presented in terms of absolute noise levels to confirm whether the policy test is met. See Question 7.	The Applicant acknowledges this comment.
SNC-122	Noise and Vibration	5 CONSTRUCTION AND DECOMMISSIONING VIBRATION 5.1 Criteria The proposed construction vibration impact thresholds are set out in Table 12-8 of the ES in terms of Peak Particle Velocity (PPV) as follows:	The Applicant acknowledges this comment.

ID	Theme	Representation	Applicant's Response
		• SOAEL – ≥ 1.0 mm/s • LOAEL – ≥ 0.3 mm/s These are widely used vibration limits based on guidance in BS 5228-2:2009+A1:2014 — Code of practice for noise and vibration control on construction and open sites — Part 2: Vibration, and in our opinion are justifiable. Section 15.5.57 of the ES states that “Based on guidance provided within BS 5228-2 (Ref 12-21), significant effects due to construction vibration could occur when major or moderate effects are anticipated to exceed: • A period of 10 or more days of working in any 15 consecutive days; or • For a total number of days exceeding 40 in any 6 consecutive months.” The wording of this statement refers to “significant effects” rather than exceedances of specific noise thresholds. This suggests that the time criteria are intended to apply at the EIA significance stage, rather than directly to exceedances of the defined	

ID	Theme	Representation	Applicant's Response
		SOAEL and LOAEL thresholds. See Question 1. In addition to the above thresholds, the ES adopts an additional vibration limit of 3 mm/s for the threshold for damage to buildings. The ES states that this is adopted as a conservative limit "to ensure that building damage would not occur". This is more onerous the building damage thresholds set out in BS 5228-2 and therefore is a robust approach.	
SNC-123	Noise and Vibration	5.2 Predictions 5.2.1 Construction vibration Appendix 12.2 Noise Modelling And Calculations states that construction vibration levels have been calculated using reference data from BS 5228-2:2009+A1:2019, Code of Practice for Noise and Vibration Control on Construction and Open Sites: Part 2 – Vibration. The reported vibration levels are plausible but there is only partial information on the data used in the calculations and it is not clear what calculation methodology was used.	The assumptions used within the assessment are presented within ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]. This includes the assumptions used for vibratory ground compaction and percussive piling. The calculation methodology is based on guidance provided within Table E.1 in Appendix E of BS 5228-2:2009+A1:2019, Code of Practice for Noise and Vibration Control on Construction and Open Sites: Part 2 – Vibration. BS 5228-2 does not provide specific source data for trenchless techniques such as HDD; therefore, assessment is typically based on comparable activities and professional judgement. HDD is a non-percussive, continuous drilling activity which involves axial, torsional and lateral

ID	Theme	Representation	Applicant's Response
		Question 8 – Provide a detailed description of the calculation methodology used to predict construction vibration levels (vibratory ground compaction, percussive piling and HDD) at the receptors. This should include a commentary of the assumptions used (number and location of sources) and examples of specific calculations.	vibrations confined to the drill string. Vibrations are primarily a mechanical/efficiency issue rather than an environmental emission. Vibration energy is largely dissipated within the ground/borehole rather than generated widely. Available literature which supports this view includes Vibrations due to horizontal directional drilling in Lucan Formation rock and Dublin Boulder Clay (Ciaran Reilly et al, 2020).
SNC-124	Noise and Vibration	5.2.2 Access roads The ES sites in Section 12.8.32 that “BS 5228-2:2009+A1:2014 (Ref 12-21) cites findings from the Transport Research Laboratory Report 429, Groundborne Vibration Caused by Mechanised Construction Works (Ref 12-28). Figure 46a of the TRL report shows that ground vibration generated by HGV movements typically reaches around 1 mm/s PPV at a distance of approximately 10 m, reducing to roughly 0.3 mm/s PPV at around 50 m. This is plausible and aligns with the SOAEL and LOAEL thresholds without need for a separate calculation.	The Applicant acknowledges this comment.

ID	Theme	Representation	Applicant's Response
SNC-125	Noise and Vibration	5.3 Assessment The predicted construction vibration levels in Table 2.13 in Appendix 12.2 Noise Modelling And Calculations shows that construction activities associated with access roads would exceed SOAEL for any receptors within 45m and LOAEL with 100m of the access roads. Question 9 – Confirm how many receptors will be within 10m, 45m, 50m and 100m of the proposed access roads, and are therefore expected to be subject to vibration levels which exceed the respective SOAEL and LOAEL thresholds (due to construction activity and HGV movements respectively). Please also confirm the durations for which the impacts are expected to occur. Section 12.8.25 of the ES states that vibration levels from HDD activities are below the LOAEL at all receptors. This is plausible, subject to the information on the calculation methodology (see Question 9).	The assessment of construction vibration is presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The assessment concludes that noise generated from the construction of access tracks is not expected to be above the SOAEL as no receptors are expected to be within 30m, and therefore is not expected to be significant. The locations of access roads have not been confirmed at this stage and will be addressed at the detailed design stage. The Applicant will take in to consideration the design and location of access points having regard to the proximity to existing dwellings.
SNC-126	Noise and Vibration	5.4 Mitigation and policy tests There are limited options for construction vibration mitigation, beyond those embedded within scheme and general construction controls. Therefore, if	The Applicant acknowledges this comment.

ID	Theme	Representation	Applicant's Response
		construction vibration levels are below SOAEL and all the available embedded mitigations options are incorporated into the design of the scheme and Construction Environmental Management Plan (CEMP) the NPSE policy tests are likely to be met (subject to the answers to the questions above).	
SNC-127	Noise and Vibration	6 OPERATIONAL NOISE 6.1 Criteria 6.1.1 Residential receptors The proposed operational noise impact thresholds for residential receptors are set out in Table 12-11 of the ES in terms of the Rating Level (Lar, Tr, assessed in accordance with BS4142). The term No Observed Adverse Effect Level (as opposed to No Observed Effect Level) is not commonly used in noise assessments and its meaning in this context is unclear. This is because as the threshold up to which there are no adverse effects (NOAEL) is the same threshold above which adverse effects are first seen to occur (LOAEL). Using the thresholds proposed by the Applicant, operational noise with rating of	Table 12-4 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] defines the NOEL, NOAEL and LOAEL from PPG noise guidance. Table 12-11 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] establishes the NOAEL (No Observed Adverse Effect Level) as being when the rating level is equal to the background sound level. The LOAEL (Lowest Observed Adverse Effect Level) is established as being when the rating level is equal to 5 dB above the background sound level. The Applicant considers that this is in-line with the intention of BS 4142 which states that: • When the rating level is around or below the background sound level, it is an indication of a low impact, depending on the context. • When the rating level is around 5 dB above the background sound level, it is an

ID	Theme	Representation	Applicant's Response
		between 0 and 5 dB above the background sound level would be both above and below the level where adverse effects occur, which cannot be correct. We understand that SNC have a precedent of setting operational noise limits for similar developments of a rating level at or below background sound level (subject to context) and we understand that SNC have proposed the same in this case. This would result in the following threshold levels for noise impacts: • SOAEL: 10 dB above the typical background sound level, depending on context • LOAEL: 0 dB above the typical background sound level, depending on context This agrees with the Applicant's position that rating levels below at or below background sound level will not generate adverse impacts. This position is also consistent with Section 12.9.2 of the ES which states that "...to achieve the criteria of the local authority, additional mitigation will be applied to not	indication of an adverse impact, depending on the context. • When the rating level is around 10 dB above the background sound level, it is an indication of a significant adverse impact, depending on the context. The assessment criteria recognise that noise can be detectable, but not be associated with an adverse impact, and is in-line with industry guidance and national policy.

ID	Theme	Representation	Applicant's Response
		exceed the NOAEL where practicably possible"	
SNC-128	Noise and Vibration	6.1.2 Non-residential buildings The proposed operational noise impact thresholds for non-residential buildings are set out in Table 12-12 of the ES in dB $L_{Aeq,T}$. Setting LOAEL and SOAEL thresholds for non-residential receptors is a thorough approach by the Applicant which should be welcomed by SNC. However, I note that the criteria imply that a SOAEL and LOAEL can be the same numerical value, which cannot be correct. Question 10 – Confirm the intended numerical values for LOAEL and SOAEL at nonresidential receptors	The LOAEL and SOAEL values for non-residential receptors are presented in Table 12-12 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The LOAEL and SOAEL values have not been clearly replicated within Table 12-12. These values should be as follows: Executive Office: SOAEL – 40 dB $L_{Aeq,T}$ LOAEL – 35 dB $L_{Aeq,T}$ Place of Worship: SOAEL – 35 dB $L_{Aeq,T}$ LOAEL – 30 dB $L_{Aeq,T}$ Nursery: SOAEL – 40 dB $L_{Aeq,T}$ LOAEL – 35 dB $L_{Aeq,T}$
SNC-129	Noise and Vibration	6.1.3 Low frequency noise Section 12.5.60 of the ES sets an additional parallel SOAEL threshold for low frequency noise in residential receptors as follows:	The Applicant acknowledges this comment.

ID	Theme	Representation	Applicant's Response
		<i>NANR45 (Ref 12-16) criteria applied to residential and educational receptors (high sensitivity), are provided in ES: Appendix 2.3 Legislation, Planning Policy and Guidance [EN0110014/APP/6.3.2.3]. Where the predicted levels exceed NANR45 (Ref 12-16) criteria, this may be considered as being above the SOAEL and therefore the significance of operational noise is modified to be significant. Anything equal to or below the threshold would be considered as below the SOAEL and the significance of operational noise would not require modification.</i> We agree that low frequency noise from substations and transmission equipment is a key concern and that this is an appropriate approach.	
SNC-130	Noise and Vibration	6.1.4 Public rights of way (ProW) The proposed operational noise impact thresholds for non-residential buildings are set out in Table 12-13 of the ES in dB Laeq,T.	The Applicant acknowledges this comment. As in the response to SNC-138, calculated specific sound levels fall below both WHO guidelines and existing ambient sound levels at all PROWS. Therefore impact is not anticipated.

ID	Theme	Representation	Applicant's Response
		Defining LOAEL and SOAEL thresholds for public rights of way is a thorough approach by the Applicant which should be welcomed by SNC. These thresholds are derived from the World Health Organization (WHO) Guidelines for Community Noise (1999), which sets noise levels for external amenity areas to minimise annoyance to residents, defined as Moderate (≤ 50 dB Laeq,T) and Serious (≤ 55 dB Laeq,T). The WHO guidelines make it clear that these noise limits are intended for anonymous or general environmental noise and situations where no single identifiable source dominates. Therefore, compliance with these limits will not necessarily prevent operational noise impacts in an existing rural noise climate. See Question 16.	
SNC-131	Noise and Vibration	6.2 Predictions 6.2.1 Background sound levels The methodology and results of the Applicant's noise surveys are presented in EN0110014- 000242-6.3.12.1 Environmental Statement Volume 3 Appendix 12.1 Baseline Sound Survey Report. Results are provided for 6-8 noise	The process is judgement-based, supported by statistical analysis of the measured $L_{A90,T}$ data and based on guidance provided within BS 4142:2014+A1:2019. The statistical method comprised a frequency-distribution review of the measured $L_{A90,15\text{minutes}}$ data for each relevant assessment period. The distribution of values was reviewed to identify the most commonly occurring background sound

ID	Theme	Representation	Applicant's Response
		surveys at 51 locations around the development site. AJA have not reviewed the noise survey at individual locations due to the scale of this task, but our initial impression is that the survey methodology appears appropriate. The typical background sound levels used in the operational noise assessment are presented Table 22 of the survey report and are stated to be based on the statistical analysis in Appendix D of the same document. Appendix D presents modal distributions for the sound levels measured in Daytime (07:00 – 23:00), Night-time (23:00-07:00) and Early Morning (04:00-07:00) periods at each measurement location (for example, see below for location MP39). Table 22 reports the typical background sound levels measured at MP39 to be: • Daytime: 30 dB LA90,15mins • Night-time: 22 dB LA90,15mins • Evening: 24 dB LA90,15mins There are several recognised approaches to determine typical background sound levels in BS 4142:2014+A1:2019 and the	levels, together with the range and spread of the dataset. The selected representative background sound level was then determined using professional judgement, informed by this distributional analysis and excluding periods that were not considered representative of typical baseline conditions where appropriate. No single prescribed statistic, such as the arithmetic mean or minimum value, was applied in isolation.

ID	Theme	Representation	Applicant's Response
		associated ANC BS 4142 Technical Note. However, it is not clear which statistical methodology has been used in this case. Question 11 – Describe the specific statistical method used to determine representative background sound levels from the survey data presented in Appendix D of the Baseline Sound Survey Report.	
SNC-132	Noise and Vibration	6.2.2 Operational noise levels The prediction methodology for the operational noise levels is contained in Section 3 of the Appendix 12.2 Noise Modelling And Calculations report. The report provides a brief description of the data, screening and methodology used to predict operational noise levels at the receptors, which are summarised in Tables 3.17, Table 3.18 and 3.19 along with outline operational noise contours in Appendix B. This not enough information to tell if the results of the modelling are likely to be reliable. However, several specific questions arise from the limited information supplied: Source data Table 3.14 of this report sets out the data used in the noise modelling in terms of A-	The assessment of operational noise makes use of typical system spectra (1/3 octaves). The information used in the model is based on Stantec's library of representative data, as well as information provided by the Applicant. The information, as well as locations used within this model, are at this stage representative, but indicative, and subject to change with the finalised design. The assessment is intended to support an approach which allows the Applicant to select equipment and design the layout at the detailed design stage. The model used largely comprises point sources. The exception to this is the BESS containers, which also utilised areas sources. The model is based on the sound power levels identified in Table 3.14 of ES Volume 3: Appendix 12.2 – Noise Modelling and Calculations [APP-179]. The sound pressure level at 10 m is provided for comparison purposes, based on typical point

ID	Theme	Representation	Applicant's Response																								
		weighted sound power and sound pressure levels at 10m. <table><tr><th>Item of Plant</th><th>Sound Power (dBA)</th><th>Sound Pressure Level at 10m (dBA)*</th></tr><tr><td>Solar Inverter (per inverter)</td><td>91</td><td>63</td></tr><tr><td>BESS Container – Daytime</td><td>77</td><td>49</td></tr><tr><td>BESS Container – reduced fan speed duty – nighttime and early morning (per battery)</td><td>72</td><td>44</td></tr><tr><td>BESS Inverter (per inverter)</td><td>83</td><td>55</td></tr><tr><td>132kV Substation</td><td>85</td><td>57</td></tr><tr><td>400kV Substation</td><td>85</td><td>57</td></tr><tr><td>Solar Tracking Motor (per motor)</td><td>50</td><td>50</td></tr></table>	Item of Plant	Sound Power (dBA)	Sound Pressure Level at 10m (dBA)*	Solar Inverter (per inverter)	91	63	BESS Container – Daytime	77	49	BESS Container – reduced fan speed duty – nighttime and early morning (per battery)	72	44	BESS Inverter (per inverter)	83	55	132kV Substation	85	57	400kV Substation	85	57	Solar Tracking Motor (per motor)	50	50	source losses, and as noted by AJA, differ from those presented due to equipment sizes. At distances significantly greater than plant dimensions, the use of point sources is considered appropriate. As receptors are at a significant distance to noise sources compared to the equipment dimensions, this approach is considered representative and appropriate. National Grid Information A description of the National Grid Substation is provided in paragraphs 4.3.1 – 4.3.8 of ES Volume 1: Chapter 4 – The Scheme [APP-040]. The description outlines that the National Grid Substation is likely to comprise: • Switchgear • A control building housing equipment • Car parking The system is proposed to include a newly constructed double busbar substation. At this stage, it has not been confirmed if transformers will be installed as part of the National Grid Substation. However, to provide a worst-case assessment, 4no. transformers have been modelled as having a total sound power level of 85 dBA each. Noise levels produced by the National Grid Substation may therefore be lower than modelled. Once the
Item of Plant	Sound Power (dBA)	Sound Pressure Level at 10m (dBA)*																									
Solar Inverter (per inverter)	91	63																									
BESS Container – Daytime	77	49																									
BESS Container – reduced fan speed duty – nighttime and early morning (per battery)	72	44																									
BESS Inverter (per inverter)	83	55																									
132kV Substation	85	57																									
400kV Substation	85	57																									
Solar Tracking Motor (per motor)	50	50																									

ID	Theme	Representation	Applicant's Response																			
		It's not clear if the modelling is based on the A-weighted source data in Table 3.14 or other spectral data. This is important because environmental attenuation effects are frequency dependent and likely to underpredict noise levels if A-weighted source data is used. <u>Size of noise sources</u> We note that the sound pressure levels presented in the table are consistently 28 dB lower than the corresponding sound power levels (with the exception of the solar tracking motor, which appears to be an error). This fixed difference implies that all sources have been treated as point sources radiating into a free field at a distance of 10 m. In practice, this assumption is unlikely to be valid, as many of the identified sources (e.g. transformers, inverters, containerised plant) are physically large and cannot be considered acoustically small relative to this distance. As a result, the approach is likely to underestimate sound pressure levels at nearby receptors, potentially leading to a significant underprediction of operational noise levels, depending on how this input data has been applied within the model.	design has been finalised, an operational noise assessment will be carried out. In relation to the National Grid Substation, the Outline OEMP [APP-197] outlines that: <i>"...the Applicant commits that noise at sensitive receptors will be no higher than the levels presented in ES: Chapter 12 – Noise and Vibration [EN0110014/APP/6.1.12] and these levels will be set out in the detailed OEMP."</i> <u>Consideration of Reflections</u> Further calculations have been undertaken to determine the effect of considering more reflections in the noise model, for receptors around the BESS area. The results of the calculations are presented below. <table border="1"> <tr> <th rowspan="2">Period</th><th colspan="3">Calculated Rating Level $L_{Ar,Tr}$ dB with Reflection Order of 2 / 5</th></tr> <tr> <th>NSR2B</th><th>NSR3A</th><th>NSR3B</th></tr> <tr> <td>Daytime</td><td>31/32</td><td>33/34</td><td>35/36</td></tr> <tr> <td>Night-time</td><td>29/30</td><td>30/30</td><td>33/33</td></tr> <tr> <td>Early Morning</td><td>32/32</td><td>30/31</td><td>33/33</td></tr> </table>	Period	Calculated Rating Level $L_{Ar,Tr}$ dB with Reflection Order of 2 / 5			NSR2B	NSR3A	NSR3B	Daytime	31/32	33/34	35/36	Night-time	29/30	30/30	33/33	Early Morning	32/32	30/31	33/33
Period	Calculated Rating Level $L_{Ar,Tr}$ dB with Reflection Order of 2 / 5																					
	NSR2B	NSR3A	NSR3B																			
Daytime	31/32	33/34	35/36																			
Night-time	29/30	30/30	33/33																			
Early Morning	32/32	30/31	33/33																			

ID	Theme	Representation	Applicant's Response			
		National Grid equipment The report claims that the predicted noise levels include noise from the NG substations, but it's not clear from the supplied data that this has been included in the modelling. In our experience, noise sources associated with NG substations typically include transformers, shunt reactors, cooling fans, switchgear systems and corona discharge from overhead lines and other exposed conductors, which are not listed in the document. <u>BESS Fencing</u> We note that the modelling includes 4 m high noise barriers around the BESS equipment and the environmental noise model includes for up to 2 reflections off surrounding surfaces. In our experience, a larger number of reflections is required to accurately predict the noise propagation from sources surrounded by reflected surfaces and the operational noise model is likely to substantially under-predict noise from the BESS. Question 12 – Provide a detailed description of the modelling methodology used to	Early Morning Mitigated	32/32	30/31	33/33
			The outcome of considering a reflection order of 5 in the modelling is not significantly different to that presented within the ES. The most notable change is at NSR2B during the night, where the rating level would be calculated to exceed the background sound level by 1 dB, rather than be in-line with the background sound level. This outcome does not change the significance, and the Applicant is still committed to achieving the levels presented in the ES. <u>Model Settings</u> The calculation settings are provided in Section 3.6 of ES Volume 3: Appendix 12.2 – Noise Modelling and Calculations [APP-179]. A ground factor of 1 has been used in the calculations. The following source heights have been used in the model: 132kV Substation transformer – 3 m 400kV Substation transformer – 3 m BESS Substation transformer & inverter – 3 m above ground BESS Inverters – 1.5 m above ground			

ID	Theme	Representation	Applicant's Response
		predict operational noise levels at the receptors. This should include detailed commentary of the source data, assumptions used (number, size and location of sources), justification of the model settings and worked examples of key models (BESS, NG Substation, Solar Tracking Motors etc).	BESS Container – 3 m high, 2.4 m wide Solar Inverters – 2 m above ground Tracking Motors – 1.5 m above ground
SNC-133	Noise and Vibration	6.2.3 Rating level Table 3.16 of the Appendix 12.2 Noise Modelling And Calculations report explains that no acoustic feature corrections have been applied to the predicted sound level and presents the justification for this. This table correctly states that high voltage transformers can generate a 100Hz hum due to vibration of the transformer coil but states that "The acoustic modelling exercise indicates that the specific sound level from the high voltage transformers, including the 100Hz tone, is unlikely to be distinguishable at the receptor as it will be masked by other broadband sound relating to the BESS inverters and BESS Containers." There is	The acoustic feature corrections, along with justifications, are provided in Table 3.16 ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]. In terms of impulsivity, the proposed equipment runs continuously without producing sudden, noticeable sounds. Acoustic feature corrections for impulsivity are therefore not applied. In terms of intermittency, during the battery charging and discharging process, inverters, transformers and battery cooling systems operate continuously, surpassing the BS 4142 reference time interval (1 hour during the day and 15 minutes at night). As the system cools down, the cooling units shut off gradually and at different times,

ID	Theme	Representation	Applicant's Response
		insufficient information in the report to justify this claim. We also note that there is no discussion of noise from shunt reactors (typically tonal), switch gear (impulsive noise), or corona discharge (cracking/buzzing). Question 13 – Provide a more detailed justification (with detailed noise data for the specific sources and predicted levels at worst affected receptors) to justify the claim that that no acoustic feature corrections should be applied in this case.	without any distinct on/off patterns. Therefore, no rating penalty has been applied for intermittency. In terms of tonality, Table 3.16 of ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179] advises that energy storage systems typically produce broadband sound without identifiable tones. While high voltage transformers can generate a 100 Hz hum (and associated harmonics) due to vibration of the transformer coil, the modelling outcome demonstrates that this is unlikely to be distinguishable at receptors, and it would be masked by other broadband sound relating to the BESS. Further to the assessment provided within the ES, an assessment of tonality has been made at the anticipated worst-affected receptor (Receptor NSR3B) using the procedure outlined in Annex C of BS 4142:2014+A1:2019. The outcome of the assessment indicates that no identifiable tones would be present at the receptor. It should be recognised that the assessment has been undertaken on example noise data, not the finalised plant selection. As per the Outline OEMP [APP-197] an assessment will be undertaken to ensure compliance with the levels presented in the ES.

ID	Theme	Representation	Applicant's Response
SNC-134	Noise and Vibration	6.2.4 Internal noise levels Section 12.8.58 of the ES states that internal noise levels have been predicted by assuming a 10 dB reduction of external noise levels through partially open windows. This assumption is likely to be appropriate for broadband sources and therefore acceptable for nonresidential receptors, where the internal thresholds are set in terms of A weighted levels. However, this approach may underpredict external noise break in at low frequency, which is highly variable and dependant on many factors including the construction, configuration, size and shape of the building elements. For assessment of internal levels against the lowfrequency NANR45 criterion we consider that a 5 dB outside to inside level difference is more appropriate.	The use of a 5 dB reduction at low frequencies has been further considered. Assuming a 5 dB loss at low frequencies would still result in achieving the NANR45 low frequency noise criteria within dwellings, it would not alter the outcome of the assessment.
SNC-135	Noise and Vibration	6.3 Assessment, mitigation and policy tests 6.3.1 High-sensitivity receptors (residential, schools, hospitals and places of worship) Table 12-22 of the ES summarises the impacts of operational noise for high-sensitivity receptors.	The LOAEL and NOAEL values presented within Table 12-11 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] are noted as being the preliminary values, which require further consideration of context. Notwithstanding this, the NOAEL value presented is considered to be representative of the no observed adverse effect

ID	Theme	Representation	Applicant's Response
		The predicted noise levels are above NOAEL (which in our opinion equates to the actual LOAEL in the case of residential receptors, see Section 6.1.1) at up to 21 receptors but do not exceed SOAEL at any receptor. Notwithstanding the comments above on the prediction methodology, this appears to meet the first policy test of the NPSE to avoid significant adverse impacts. Section 12.9 of the ES discusses options for additional mitigation measures, presumably to comply with the second test of the NPSE to minimise adverse impacts with appropriate mitigation. Table 12-25 provides the following reductions required to reduce noise levels to below NOAEL (which in our opinion equates to the actual LOAEL in the case of residential receptors). The ES states that options for additional mitigation “include low-noise inverter models, acoustic enclosures, relocation or reorientation of plant, or installation of noise barriers, subject to further detailed design” and that these measures are included within the Outline Operational Environmental Management Plan [EN0110014/APP/7.2]	level, and in-line with guidance presented within BS 4142. At this stage, the assessment is based on an example dataset and an example layout which represents a worst-case scenario. Paragraph 12.9.3 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] states that mitigation could include procuring low-noise inverters, acoustic enclosures, relocation or reorientation of plant, or installation of noise barriers. Procurement of low-noise inverters could reduce noise emissions from those assumed by up to 8 dB, locating the inverters at greater distances from receptors could significantly contribute to noise reductions, and line of sight screening provided by barriers could reduce noise levels at receptors by 5 dB. These measures are not expected to have a significant influence on other project constraints. The Applicant will provide further information in the Outline OEMP in due course, setting out a mitigation hierarchy in respect of noise emissions from the inverters.

ID	Theme	Representation	Applicant's Response
		(OEMP). The OEMP lists generic noise mitigation measures which could be applied but does not provide details of these. We note that Table 3.7 of the OEMP includes a commitment for noise levels at receptors to be below the background sound level, which is welcomed as meeting the NPSE policy to minimise adverse impacts with appropriate mitigation (assuming the mitigation can be implemented and the stated noise reductions are achievable in practice). Question 14 – Provide additional commentary showing examples of how the suggested mitigation measures might practically be implemented to achieve the noise reductions stated in Table 12-25 of the ES within the other project constraints (including visual impact).	
SNC-136	Noise and Vibration	Question 15 – Confirm whether the commitment for noise levels to be below the background sound levels at residential receptors be secured with a DCO Requirement?	The Applicant commits to achieving the levels presented within the ES, within the Outline OEMP [APP-197]. The Outline OEMP [APP-197] is secured via Requirement 14 within the Draft DCO [AS-032].
SNC-137	Noise and Vibration	6.3.2 Low frequency noise in dwellings The predicted internal low-frequency noise levels within dwellings are all below the NANR45 threshold (SOAEL). Compliance	The Applicant acknowledges this comment.

ID	Theme	Representation	Applicant's Response
		would still be achieved even assuming a conservative worst-case façade attenuation ('break-in') of 5 dB. Notwithstanding the comments above on the prediction methodology, this appears to meet the first policy test of the NPSE to avoid significant adverse impacts.	
SNC-138	Noise and Vibration	6.3.3 Public rights of way (ProW) As discussed, in our opinion the proposed absolute noise thresholds for public rights of way do not account for the differences in character of the noise from existing and proposed sources, and compliance with these limits will not necessarily prevent operational noise impacts in an existing rural noise climate. Furthermore, we note that Table 3.7 of the OEMP commits to control noise levels to below 55 dBA on public rights of way. This is the SOAEL set out in Table 12-13 of the ES and the proposal therefore does not meet the NPSE policy test to minimise adverse impacts. Question 16 – Provide details of the existing ambient noise levels and the predicted operational noise levels at the ProW	The following measurement locations and ambient sound levels have been considered representative of the respective sites. The following presents the measured ambient sound level, along with the predicted operational noise levels along ProWs, as presented in Tables 12-17 and 12-24 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Site 1 (NSR6) – MP43 Measured 53 dB $L_{Aeq,16hours}$ Calculated <50 dB $L_{Aeq,16hours}$ Site 2 (NSR12) – MP49 Measured 49 dB $L_{Aeq,16hours}$ Calculated <40 dB $L_{Aeq,16hours}$ Site 3 (NSR19) – MP38 Measured 45 dB $L_{Aeq,16hours}$ Calculated <40 dB $L_{Aeq,16hours}$

ID	Theme	Representation	Applicant's Response
		receptors (NSR6, NSR12, NSR19, NSR27, NSR26, NSR57, NSR63, NST70, NSR79).	Site 4 (NSR27) – MP30 Measured 48 dB $L_{Aeq,16hours}$ Calculated <40 dB $L_{Aeq,16hours}$ Site 5 (NSR36) – MP31 Measured 50 dB $L_{Aeq,16hours}$ Calculated ≤50 dB $L_{Aeq,16hours}$ Site 7 (NSR57) – MP19 Measured 51 dB $L_{Aeq,16hours}$ Calculated <50 dB $L_{Aeq,16hours}$ Site 8 (NSR63) – MP11 Measured 47 dB $L_{Aeq,16hours}$ Calculated <50 dB $L_{Aeq,16hours}$ Site 9 (NSR70) – MP9 Measured 45 dB $L_{Aeq,16hours}$ Calculated <40 dB $L_{Aeq,16hours}$ Site 10 (NSR79) – MP50 Measured 60 dB $L_{Aeq,16hours}$ Calculated <50 dB $L_{Aeq,16hours}$ The presented ambient and calculated sound levels do not change the outcome of the assessment.

ID	Theme	Representation	Applicant's Response
			The Outline CEMP [APP-196] will be amended at Deadline 1 to confirm that predicted sound levels along the PRoW will be mitigated as far as practicable to achieve 50dBA and not exceed 55dB(A).
SNC-139	Noise and Vibration	7 CUMULATIVE EFFECTS Table 12-28 of the ES considers the combined effects of two nearby consented developments alongside the proposed scheme. For application 2024/3817, the reported noise levels do not include the additional mitigation measures committed to in the OEMP. Even if those mitigation measures were applied, the combined noise level would remain above the existing background sound level and would therefore constitute an adverse impact the thresholds set out in Table 12-11 of the ES. Question 17 – Confirm if the commitment in the OEMP to reduce operational noise level to below existing background sound levels extends to a commitment to keeping the cumulative noise level below the existing background sound level at NSR3A?	The following commitments are included in the Outline OEMP [APP-197]: - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements of the Scheme will not exceed the background sound level at other residential receptors. - Specific sound levels due to plant on the Scheme on ProWs will not exceed 55 dBA. However, there is no commitment to keep cumulative noise levels below the existing background sound level at NSR3A. <u>Daytime Operational Noise Levels</u> During the daytime at NSR3A, the rating levels from both schemes are: 33 dB $L_{Ar,1hour}$ from the Scheme 29 dB $L_{Ar,1hour}$ from the committed development

ID	Theme	Representation	Applicant's Response
		The approach for 2025/1689 appears reasonable. We have not checked whether there are any additional developments which should be considered in cumulative assessments.	34 dB $L_{Ar,1hour}$ in total, from both schemes. During the daytime, this is 7 dB below the background sound level. On this basis no significant cumulative effects are anticipated during the daytime period. <u>Night-time Operational Noise Levels</u> During the night-time at NSR3A, the rating levels from both schemes are: 30 dB $L_{Ar,1hour}$ from the Scheme 29 dB $L_{Ar,1hour}$ from the committed development 33 dB $L_{Ar,1hour}$ in total, from both schemes. During the night-time, this is 2 dB above the background sound level. While this is 2 dB above the background sound level, the cumulative effect is not considered to be significant, owing to the relatively low background sound level at the receptor. <u>Early Morning Operational Noise Levels</u> During the early morning at NSR3A, the rating levels from both schemes are: 30 dB $L_{Ar,1hour}$ from the Scheme 29 dB $L_{Ar,1hour}$ from the committed development 33 dB $L_{Ar,1hour}$ in total, from both schemes.

ID	Theme	Representation	Applicant's Response
			During the early morning, this is 1 dB above the background sound level. While this is 1 dB above the background sound level, the cumulative effect is not considered to be significant, owing to the relatively low background sound level at the receptor. It is noted that there is an error in Table 12-28 of ES Volume 1: Chapter 12 – Noise and Vibration [APP-048]. It should state that specific sound levels from the Scheme are 33 dB $L_{Aeq,T}$ (without mitigation) and that specific sound levels from the committed development (planning reference 2024/3817) are 29 dB $L_{Aeq,T}$. ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] will be updated and submitted prior to the close of the Examination.

2.3 Suffolk County Council

Table 2.3 Applicant's Response to Suffolk County Council [[RR-1865](#)]

ID	Theme	Representation	Applicant's Response
SCC-001	General comments	1.4 Whilst no part of the proposed development lies within Suffolk, SCC is considered a statutory consultee for the application as a neighbouring local authority. As a neighbouring authority, SCC's interest in the proposed development is restricted only to matters relating to Suffolk which is reflected in the contents of this submission. In this case, the matters of interest to SCC relate to traffic and transport, particularly movements of Abnormal Indivisible Loads, and economy, skills and tourism. In what follows, the Council details its concerns within these areas for which further information and changes to submitted documents are required in the Council's view.	The Applicant notes this comment and responds to the specific points made by Suffolk County Council (SCC) below.
SCC-002	Consultation and Engagement	1.5 In previous consultation responses, the Council has indicated its willingness to engage with East Pye Solar Limited to resolve issues raised in this representation. However, the promoter has not sought engagement from SCC in relation to these issues. SCC considers it necessary for the	The Applicant has engaged with Suffolk County Council in respect of Abnormal Indivisible Loads (see Appendix D Abnormal Indivisible Load Report in ES Volume 3, Appendix 11.1 - Transport Assessment Part 3 [APP-176]). The Applicant

ID	Theme	Representation	Applicant's Response
		promoter to engage with the Council, particularly on relevant control documents and the routing of Abnormal Indivisible Loads which may originate from Felixstowe.	welcomes further engagement with SCC in respect of issues raised in this relevant representation.
SCC-003	Consultation and Engagement Statements of Common Ground	1.6 SCC notes that section 13 of the Applicant's Consultation Report [APP-024] omits mention of the Council in relation to Statements of Common Ground. SCC considers that the concerns raised in this submission and their potential consequences for Suffolk, and for the delivery of the proposed project by the applicant, if left unresolved warrant a Statement of Common Ground between SCC and the Applicant. SCC expects appropriate cost recovery arrangements to ensure that this engagement does not unfairly come at the cost of the Suffolk taxpayer.	The Applicant notes the request for a joint Statement of Common Ground (SoCG) between Suffolk County Council and the Applicant. The Applicant notes from the Rule 6 Letter [PD-005] the EXA has not requested an SoCG between the Applicant and SCC. Notwithstanding, the Applicant notes this comment and welcomes further engagement with Suffolk County Council in respect of Abnormal Indivisible Loads and other matters raised in this relevant representation. The Applicant notes SCC's comment in respect of cost recovery. Appropriate agreements will be entered in to with the Council in accordance with any cost recovery guidance or regulations if applicable to the Scheme and in place, at the time of dialogue.
SCC-004	Policy and Guidance	Suffolk County Council's Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy 2026 SCC adopted its Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy on 24 February 2026, superseding the previous version of the policy adopted in May 2023. The purpose of this policy is to outline	The Applicant notes SCC's Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy 2026. The ES [APP-036 to APP-195] provides a full environmental assessment in accordance with relevant legislation and guidance. The assessment of cumulative effects is set out in ES Volume 1, Chapter 19 – In-Combination Effects

ID	Theme	Representation	Applicant's Response
		how, in principle, the Council will engage and influence other parties to ensure the interests of communities are prioritised as far as possible in terms of minimising, mitigating and compensating for adverse impacts and securing high-quality, meaningful community engagement. SCC has published guidance on community wellbeing and engagement which is considered essential for the promoter to follow. 2.2 The policy is relevant for the Council's position on the East Pye Solar proposals, and states: 2.3 <i>"Projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for."</i> 2.2.4 The Council will follow this approach in this submission and throughout the Examination process.	Assessment [APP-055] and topic-specific chapters, informed by ES Volume 3, Appendix 2.4 – Cumulative Schemes [APP-116]. Mitigation is embedded and secured through the outline management plans [APP-196 to APP-205] and Schedule 2 of the Draft DCO [AS-032].
SCC-005	Planning Performance Agreements	2.5 The Council consider it essential that an effective Planning Performance Agreements (PPAs), or other appropriate charging mechanism, is agreed with the promoter. Its	The Applicant notes SCC's position regarding Planning Performance Agreements (PPAs). The Applicant refers to its response to SCC-003.

ID	Theme	Representation	Applicant's Response
		Energy and Climate Adaptive Infrastructure Policy states: 2.6 <i>"The Council will expect developers to engage in effective pre-application discussion with the Council. The Council expects that the costs of its engagement throughout the consenting process will be covered under the terms of a Planning Performance Agreement. This will be on a full cost recovery basis, to ensure that local services, and local taxpayers, are not disadvantaged financially by the Council's engagement with project promoters."</i> 2.7 Further details on the position SCC adopts in relation to PPAs can be found in its published guidance for project promoters.	
SCC-006	Policy and Guidance	2.8 SCC considers it essential for the Applicant to consult SCC's relevant Supplementary Guidance Documents for Traffic and Transport and Socioeconomics and Skills matters in relation to the application. The concerns raised in this submission reflect what SCC expects from NSIP applications as set out in these guidance documents.	The Applicant has considered SCC's Supplementary Guidance Document for Socio-Economic Effects (document dated January 2025), and this has informed the preparation of ES Volume 1, Chapter 14 – Socio-Economics [APP-050], for instance with respect to the effects included in the analysis (see paragraph 14.3.6). The Applicant has considered SCC's Supplementary Guidance Document for Traffic and Transport (document dated January 2025), and this has informed the preparation of the ES

ID	Theme	Representation	Applicant's Response
			Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177] and Outline CTMP [APP-201]. Relevant local policy, including SCC's Strategic Plan, has also been considered with respects to traffic and transport, as stated in Section 3 of ES Volume 1, Chapter 11 – Transport and Access [APP-047] .
SCC-007	Socio-Economics	Impacts by Service Area Economy, Skills and Tourism Skills, Education and Employment 3.1 Suffolk County Council acknowledges that the Environmental Statement (ES) identifies the relevant national policy framework supporting renewable energy development and recognises the potential for socio-economic benefits associated with major infrastructure. However, the Council considers that the application documentation does not provide sufficient evidence to robustly identify, assess or secure these benefits at a local level and therefore limited weight should be afforded to the conclusions reached.	The estimated number of jobs, and the education, skills, training and supply chain opportunities created by the Scheme are identified in ES Volume 1, Chapter 14 – Socio-Economics [APP-050], which is based on standard best practice. The Outline Employment, Skills and Supply Chain Strategy (Outline ESSCS) [APP-205] sets out how the employment benefits can be maximised for local residents, including individuals from disadvantaged or under-represented groups. The Applicant's employment proposals align with the Norfolk NSIP Employment and Skills Framework, particularly its commitment to employment and employability support, by promoting local recruitment and targeted opportunities for disadvantaged groups. The detailed ESSCS is secured through Requirement 19 of the Draft DCO [AS-032].

ID	Theme	Representation	Applicant's Response
SCC-008	Socio-Economics	3.2 SCC's consultation responses consistently sought a demand-led, spatially defined and evidence-based assessment of workforce and skills, including clear identification of labour market geographies, workforce composition and delivery mechanisms. The Council notes that although the ES and Outline Employment, Skills and Supply Chain Strategy (ESSCS) have evolved, these core requirements have not been fully addressed.	The Applicant considers that the approach to assessing workforce and skills impacts is reasonable and proportionate. The figures in ES Volume 1, Chapter 14 – Socio-Economics [APP-050] are based on an appropriate set of geographies, including a local area based on the Order Limits. Direct job opportunities during the Construction Phase and the Operation and Maintenance Phase, and their skills requirements, are outlined in Table 14.26 and Table 14.27 respectively. The Applicant's response to the points raised in relation to delivery mechanisms and the Outline Employment, Skills and Supply Chain Strategy (ESSCS) are answered above in response to SCC-007.
SCC-009	Socio-Economics	3.3 While the ES Chapter 14 and the Outline ESSCS formally reference a wider geographic area including Suffolk, the assessment is substantively centred on Norfolk. Suffolk is not analysed as a distinct or functional labour market area, and there is limited evidence of workforce modelling, skills capacity assessment or delivery mechanisms relating specifically to Suffolk. As a result, the documents do not provide a robust assessment of cross-boundary labour market	Suffolk was included in the baseline of ES Volume 1, Chapter 14 – Socio-Economics [APP-050] , however the assessments of impact focused primarily on the local area (LSOAs around the Order Limits) and South Norfolk as the host local authority. Professional judgement was used to select the appropriate socio-economic study areas in order to retain relevance and proportionality in the assessment undertaken. It was considered that these study areas reflected the most appropriate focus for analysis. Nevertheless, Suffolk has been

ID	Theme	Representation	Applicant's Response
		effects or demonstrate how socio-economic benefits would be realised within Suffolk. This represents a material limitation of the assessment and further reduces the weight that can be attributed to the claimed socio-economic benefits.	included in the baselining exercise alongside Norfolk, reflecting its proximity to the Site.
SCC-010	Socio-Economics	3.4 Chapter 14 identifies employment generation during construction and operation; however, the assessment does not demonstrate how these opportunities would translate into meaningful benefits for the local or regional workforce. The ES indicates that only a very small proportion of jobs would be realised locally, with the majority of employment supported outside the host and neighbouring areas. This reflects high assumed levels of leakage and reliance on non-local labour, yet the implications of this for local economic benefit are not adequately assessed. As a result, the magnitude and significance of beneficial effects for local residents are overstated.	In ES Volume 1, Chapter 14 – Socio-Economics [APP-050], BRES data on the utility construction workforce is used to provide a realistic estimate of the proportion of the workforce which could originate from the local area (shown in Table 14.22). The magnitude of local employment impacts is assessed and found to be Negligible for South Norfolk, Norfolk, and the East of England, reflecting the limited size of estimated impacts in the context of total resident employment. With regard to the Operation and Maintenance Phase, the Scheme is considered to have a Minor Beneficial effect on jobs, employment and supply chain, which is not significant in EIA terms (Table 14.28). Therefore, the Applicant does not consider the position to be overstated. For skills and the labour market, a Moderate Beneficial impact – which is significant – is assessed for all three phases. This is based on a low magnitude of impact, but the high sensitivity of this receptor identified in Table 14.4.

ID	Theme	Representation	Applicant's Response
SCC-011	Socio-Economics	3.5 The assessment does not meet the requirements of SCC's Supplementary Guidance on the Socio-Economic Effects of NSIPs, which were clearly articulated through consultation. In particular, the ES does not adopt a sufficiently granular, demand-led approach or define workforce and supply chain geographies by phase and skill level. The reliance on simplified spatial assumptions and absence of a clearly defined functional labour market represents a substantive evidential deficiency. This prevents a robust assessment of workforce sourcing, labour market behaviour and interaction with existing conditions, including those in Suffolk as part of a shared labour market with Norfolk.	The Applicant has considered SCC's Supplementary Guidance Document for Socio-Economic Effects (document dated January 2025), and this has informed the preparation of ES Volume 1, Chapter 14 – Socio-Economics [APP-050], for instance with respect to the effects included in the analysis (see paragraph 14.3.6). The Outline ESSCS [APP-205] bases its approach on the Norfolk NSIP Employment and Skills Framework (2025) (see paragraphs 5.4.5-7). As South Norfolk is the host authority, it was considered most appropriate to draw on Norfolk County Council's guidance. Effects are assessed in ES Volume 1, Chapter 14 – Socio-Economics [APP-050] for each of the construction, operation and maintenance, and decommissioning phases. Whilst analysis is not defined by skill levels explicitly, BRES data on the utility construction workforce is used to provide a realistic estimate of the proportion of the workforce which could originate from the local area (shown in Table 14.22). Given the highly granular industry of employment data used, local authority-based geographic analysis was considered appropriate. Skills requirements for the Construction Phase and Operation and Maintenance Phase are summarised in Table 14.26 and Table 14.27

ID	Theme	Representation	Applicant's Response
			respectively of ES Volume 1, Chapter 14 – Socio-Economics [APP-050] . Greater detail is given in Table 4.2 of the Outline ESSCS [APP-205] , and this will be addressed further in the detailed ESSCS.
SCC-012	Socio-Economics	3.6 The ES also does not adequately assess labour market constraints, including skills shortages, training capacity, and barriers to local labour participation. Although the baseline identifies a mismatch between workforce supply and skills demand and a reliance on imported labour, this is not translated into an assessment of labour market capacity or delivery constraints. There is limited consideration of further education provision, apprenticeship pipelines or alignment with local skills strategies. As a result, the sensitivity of the labour market and skills system is not robustly evidenced, and the assessment fails to demonstrate that sufficient capacity exists to support the Scheme. 3.7 The identification of significant beneficial effects on employment and skills is therefore not justified. These conclusions are derived largely from estimates of gross employment generation rather than a realistic assessment of net additional benefit or deliverability. In the	The detailed ESSCS is secured through Requirement 19 of the Draft DCO [AS-032]. It will provide further detail on strategies taking account of the factors identified. ES Volume 1, Chapter 14 – Socio-Economics [APP-050] does not identify significant beneficial effects on resident-based employment (Table 14.28). Significant effects are identified for skills, due to the sensitivity of the receptor. This is explained more fully in the Applicant's response to SCC-010.

ID	Theme	Representation	Applicant's Response
		absence of robust workforce modelling and labour market analysis, the attribution of Major and Moderate beneficial effects is likely to overstate the socio-economic contribution of the Scheme and does not provide a sound basis for decision-making.	
SCC-013	Socio-Economics	3.8 The assessment is further undermined by the absence of secured mitigation and delivery mechanisms. While the ES refers to an Outline Employment, Skills and Supply Chain Strategy, there is no evidence that commitments to local employment, training or skills development are secured through the Development Consent Order or associated requirements. Without a detailed and enforceable strategy aligned to identified labour market needs, the realisation of benefits remains uncertain and cannot be relied upon in the planning balance.	The detailed Employment, Skills and Supply Chain Strategy (dESSCS) is secured by Requirement 19 of the Draft DCO [AS-032] . The Requirement confirms that the final employment, skills and supply chain strategy must be substantially in accordance with the outline employment, skills and supply chain strategy. The final strategy will be informed by continuous engagement with relevant stakeholders. The timeline for development of the dESSCS is set out in Table 7.1 of the Outline ESSCS [APP-205] .
SCC-014	Cumulative Impact	Cumulative effects 3.9 The ES concludes that there would be Major and Moderate beneficial cumulative effects on employment, supply chain and skills. However, SCC raised substantive concerns at consultation stage regarding cumulative labour market pressures, including the interaction of East Pye with other NSIPs	We acknowledge the large number of NSIPs across Norfolk and Suffolk that cumulatively have the potential for significant effects on employment, skills, and training; the Cumulative Effects Assessment concludes that there will be Major Beneficial and Moderate Beneficial effects on jobs, employment and the supply chain in South Norfolk and both Norfolk and the East of England, respectively, in the Construction Phase.

ID	Theme	Representation	Applicant's Response
		across Norfolk and Suffolk. The Council considers that these concerns have not been adequately addressed.	Cumulative Effects are discussed in detail in ES Volume 1, Chapter 14 – Socio-Economics [APP-050]. This could be seen as a favourable position and an opportunity for Norfolk and Suffolk to create employment and training opportunities for local residents through close working with stakeholders like FE colleges to develop training programmes specific to the Scheme's requirements. These opportunities could be considered further within the detailed Employment, Skills and Supply Chain Strategy to be prepared as per Requirement 19 of the Draft DCO [AS-032], coming up with plans and programmes to retain as much of the benefit locally as possible. The Cumulative Effects Assessment in ES Volume 1, Chapter 14 – Socio-Economics [APP-050] notes (paragraph 14.11.7) that the nature of cumulative effects is partly dependent on whether or not schemes overlap. In any case, the assessment is realistic about the number of workers that may come from the local area; as Table 14.22 shows, it is expected that significant proportions will come from outside the county and region. Cumulative schemes (each of which would be likely to use different contractors and therefore workforces) would also be able to draw upon this

ID	Theme	Representation	Applicant's Response
			much wider pool of labour for the construction workforce.
SCC-015	Cumulative Impact	3.10 The cumulative assessment relies primarily on the aggregation of employment outputs rather than a demand-led analysis of labour market capacity. While the ES acknowledges overlapping construction phases, it does not undertake scenario testing, workforce modelling or probabilistic assessment of labour supply availability. This is inconsistent with both SCC guidance and EIA best practice.	The Applicant considers that the approach to the cumulative assessment is reasonable and proportionate. Whilst there is no EIA best practice guidance expressly stating how such an assessment should be undertaken, ES Volume 1, Chapter 14 – Socio-Economics [APP-050] considers the overall number of cumulative schemes and the proportion of which are energy-related and specifically solar farms – and therefore most likely to require a specialist workforce with the attendant skills.
SCC-016	Cumulative Impact	3.11 In particular, the assessment does not meaningfully account for major existing and committed NSIPs already affecting the regional labour market. One such project is Sizewell C, currently under construction in Suffolk, which is not adequately reflected despite generating substantial demand for construction labour and skills provision. This represents a material omission, as major infrastructure schemes draw from a shared and finite regional and national labour pool. Evidence from the Construction Industry Training Board indicates that the construction	ES Volume 3, Appendix 2.4 – Cumulative Schemes [APP-116] includes responses (in Table 1.1) to Suffolk County Council's comments on cumulative effects, including reference to the criteria used to choose cumulative schemes in accordance with the PINS' Advice on Cumulative Effects Assessment for NSIPs. These were agreed with Norfolk County Council, the host authority.

ID	Theme	Representation	Applicant's Response
		workforce is highly mobile, with around one in five workers travelling more than 50 miles to site and approximately 28% having worked away from home in the previous year, reflecting the project-based nature of the sector (CITB Workforce Mobility and Skills in the UK Construction Sector 2022). In this context, the failure to incorporate existing demand from Sizewell C materially underestimates cumulative labour market pressures.	
SCC-017	Cumulative Impact	3.12 The ES fails to assess the consequences of concurrent demand, including competition for skilled labour, displacement between projects, wage inflation and delivery risk. It also does not evaluate the cumulative pressure on the regional skills system, including training providers and education infrastructure, despite identifying skills and the labour market as highly sensitive receptors.	The Applicant refers to its response to SCC-014, SCC-015, and SCC-016.
SCC-018	Cumulative Impact	3.13 Similarly, the approach to in-combination effects relies on the aggregation of residual effects and the application of professional judgement. This assumes that effects occur independently, when in reality multiple schemes will draw from the same limited workforce. As such, this approach does not	The Applicant refers to its response to SCC-014, SCC-015, and SCC-016.

ID	Theme	Representation	Applicant's Response
		provide a robust assessment of indirect or in-combination effects as required by the EIA Regulations.	
SCC-019	Cumulative Impact Socio-Economics	3.14 The geographic scope of the cumulative assessment is also insufficient. SCC previously highlighted the need to reflect cross-boundary labour market dynamics and include Suffolk within detailed modelling, yet this has not been adequately addressed. The absence of a clearly defined functional labour market further undermines the robustness of the assessment.	The Applicant refers to its response to SCC-014, SCC-015, and SCC-016.
SCC-020	Cumulative Impact Socio-Economics	3.15 Finally, the claimed cumulative benefits are not supported by secured mitigation or coordination mechanisms. There is no evidence that employment and skills initiatives across schemes will be coordinated or aligned and only a limited proportion of employment is likely to be realised locally. This significantly reduces the extent to which benefits can support Suffolk's economy or skills system.	The Applicant refers to its response to SCC-014, SCC-015, and SCC-016.
SCC-021	Socio-Economics	Outline Employment, Skills and Supply Chain Strategy	The Applicant's response to the points raised in relation to delivery mechanisms and the Outline ESSCS are answered in response to SCC-007, SCC-012, and SCC-013.

ID	Theme	Representation	Applicant's Response
		3.16 SCC welcomes the inclusion of an Outline ESSCS and the Applicant's stated intention to secure a detailed strategy through a DCO Requirement. However, consistent with SCC's consultation responses, the Outline ESSCS does not demonstrate that workforce demand, skills needs or delivery mechanisms have been adequately assessed or secured.	
SCC-022	Socio-Economics	3.17 The Council's guidance requires a demand-led, effects-based approach focused on workforce and skills requirements. The Outline ESSCS is largely descriptive and does not provide the detailed workforce modelling necessary to inform the assessment of impacts across transport, accommodation, housing and public services. As a result, it does not provide a reliable basis for the Environmental Impact Assessment.	Workforce numbers are provided in both ES Volume 1, Chapter 14 – Socio-Economics [APP-050] and the Outline ESSCS [APP-205]. These align with the workforce numbers used in ES Volume 1, Chapter 11 – Transport and Access [APP-047], which assesses a range of transport impacts. ES Volume 1, Chapter 14 – Socio-Economics [APP-050] assesses temporary accommodation impacts. Impacts on the private housing market and public services were not scoped into the assessment in the EIA process. Socio-economic receptors and potential effects were set out in ES Volume 3, Appendix 2.1 – EIA Scoping Report [APP-113] (Table 5.8) and neither the private housing market nor public services were scoped in. PINS requested in ES Volume 3, Appendix 2.2 – EIA

ID	Theme	Representation	Applicant's Response
			Scoping Opinion [APP-114] that socio-economics be scoped in but did not propose inclusion of any further receptors or effects.
SCC-023	Socio-Economics	3.18 Although headline workforce figures are presented, there is no comprehensive workforce definition by phase, skill level or duration. The temporal distribution of labour demand is not defined, and there is no distinction between key construction roles. This fails to demonstrate how many workers are required, what skills they will have, and for how long. SCC expects a detailed workforce assessment covering workforce numbers, occupations, skills, role durations and the anticipated level of both home-based and non-home-based employment across all project phases, in order to support coordinated labour market planning and assessment of cumulative effects.	The Applicant's response to the points raised in relation to workforce composition and definition is found in response to SCC-010 and SCC-011.
SCC-024	Socio-Economics	3.19 The submission also fails to define labour catchments or workforce geographies. There is no distinction between home-based and non-home-based workers, nor any assessment of how labour will be sourced geographically. The absence of defined workforce geographies prevents a meaningful assessment of labour market effects, infrastructure impacts and community	ES Volume 1, Chapter 14 – Socio-Economics [APP-050] considers where labour involved in the construction of the Scheme will be based – in South Norfolk, Norfolk, the East of England, or the Rest of England – so there is a distinction between local and non-local employment. The workforce numbers are based on transport modelling and therefore refer entirely to workers on site, i.e. no home-based workers are included. This was

ID	Theme	Representation	Applicant's Response
		interaction. This also limits the ability of SCC, in its role operating the Regional Skills Coordination Function (RSCF), to undertake coordinated workforce planning across Suffolk and manage cumulative labour market pressures.	considered a reasonable approach to assessing the on-site labour requirements, which are relevant to the socio-economic effects assessment. The home-based workforce will not, for example, place demands on temporary accommodation. Moreover, they may be based anywhere in the country, so are not material to e.g. local employment impacts.
SCC-025	Socio-Economics	3.20 In addition, the Outline ESSCS does not adopt the required scenario-based approach. SCC guidance requires testing of low, medium and high scenarios of home-based employment to establish a reasonable worst-case. No such scenarios are provided, and there is no quantified estimate of local versus nonlocal labour. As a result, the application does not provide a robust basis for assessing impacts or identifying mitigation.	The Applicant's response to the points raised in relation to home-based workers is found in SCC-024.
SCC-026	Socio-Economics	3.21 In relation to skills and education, the proposed initiatives are not supported by an assessment of training capacity. There is no quantification of training demand or evaluation of whether existing further education and skills provision across Norfolk and Suffolk can respond. This limits confidence that the Scheme can be delivered without exacerbating existing skills shortages. SCC expects a jointly developed education and training strategy, aligned with the RSCF,	The Applicant's response to the points raised in relation to skills and education found in SCC-012.

ID	Theme	Representation	Applicant's Response
		demonstrating how the Applicant will engage with FE, HE and private providers, support coordinated curriculum planning and deliver inclusive training pathways such as apprenticeships, bootcamps and modular provision.	
SCC-027	Socio-Economics	3.22 The Outline ESSCS also does not adequately assess labour market effects, including displacement, competition for labour or cumulative impacts. While workforce mobility is acknowledged, there is no assessment of how the Scheme will interact with existing sectors or other major projects. SCC expects explicit commitment to ongoing information sharing on workforce demand and project timelines, and participation in coordinated workforce planning to manage cumulative pressures across Suffolk's NSIPs and major developments.	A detailed Employment, Skills and Supply Chain Strategy (dESSCS) will be prepared as per Requirement 19 of the Draft DCO [AS-032] . It will provide further detail on these factors, informed by continuous engagement.
SCC-028	Socio-Economics	3.23 Supply chain effects are similarly underdeveloped. Opportunities are identified but not quantified, and there is no assessment of the capacity of local and regional businesses to participate. SCC expects the ESSCS to set out how the Applicant will share supply chain workforce requirements with the RSCF and economic partners, enabling coordinated identification	A detailed Employment, Skills and Supply Chain Strategy (dESSCS) will be prepared as per Requirement 19 of the Draft DCO [AS-032] . Chapter 7 of the Outline ESSCS [APP-205] sets out the measures which will be undertaken in the dESSCS, including a work programme structured around targeted areas for economic improvement and continuous engagement with a range of stakeholders providing direct links to learners and

ID	Theme	Representation	Applicant's Response
		of skills gaps, strengthening of local supply chain capacity and timely engagement of businesses with project opportunities.	jobseekers. The final employment, skills and supply chain strategy must be substantially in accordance with the outline employment, skills and supply chain strategy.
SCC-029	Socio-Economics	3.24 Finally, governance and delivery arrangements are not sufficiently defined. There is no clear mechanism for alignment with Suffolk County Council or Regional Skills Coordination Function, nor any commitment to joint monitoring arrangements or agreed performance measures. SCC expects the Applicant to commit to ongoing consultation and engagement, with SCC as a named consultee in the preparation, implementation and monitoring of the detailed ESSCS, including participation in joint governance structures and reporting against agreed employment, training and supply chain outcomes. To facilitate a robust detailed ESSCS as it relates to Suffolk, SCC considers it necessary for SCC to be a named consultee in the discharge of the relevant DCO Requirement on the face of the Order.	The Outline ESSCS [APP-205] sets out monitoring and delivery actions, which will be further developed in the detailed Employment, Skills and Supply Chain Strategy. The Outline ESSCS explains that the Applicant has engaged with a range of statutory partners through the statutory consultation process. This engagement has informed an understanding of key challenges in the local labour market and has helped identify opportunities to maximise socio-economic benefits. The Applicant intends to continue to broaden engagement with a long list of stakeholders, including NCC Skills and Employment Team, College of West Anglia, City College Norwich, East Coast College, University of East Anglia, Boost Programmes, NCC Careers Hub and Apprenticeships Norfolk. The Applicant will update the Outline ESSCS [APP-205] at Deadline 1 to include that the detailed ESSCS will be approved by SNC in consultation with NCC and SCC. The Applicant considers that its engagement with these stakeholders will ensure a robust ESSCS.

ID	Theme	Representation	Applicant's Response
SCC-030	Socio-Economics	3.25 While the Outline ESSCS is presented as applying to a wider regional labour market, in practice it is predominantly focused on Norfolk and does not give sufficient consideration to Suffolk as part of an interconnected functional economic area. This is a material limitation given that Suffolk is already subject to substantial demand from existing and consented NSIPs, including Sizewell C and other major energy infrastructure, which draw from the same finite pool of skilled labour and training provision. The failure to meaningfully incorporate Suffolk within workforce modelling, skills capacity assessment and delivery mechanisms means that the Strategy does not reflect the realities of crossboundary labour market behaviour or cumulative demand. In the absence of a robust assessment of Suffolk's role within the labour market, and without alignment with Suffolk's education, training and coordination structures, the ESSCS does not demonstrate how adverse cumulative pressures will be managed or how benefits will be realised within Suffolk. This represents a substantive evidential gap which further undermines the reliability of the socioeconomic assessment	The Applicant refers to its response to SCC-014 and SCC-016.

ID	Theme	Representation	Applicant's Response
		and reduces the weight that can be attributed to the claimed skills and employment benefits in the planning balance.	
SCC-031	Socio-Economics	Tourism 3.26 Section 14 of application document Environmental Statement Volume 1: Chapter 14 – Socio-Economics [APP-050] states that, at peak, there will be an estimated 720 workers, which offers good economic opportunities for the South Norfolk area, with 360 net jobs created. Section 14.8.50 estimates that 120 workers may need to find temporary accommodation in the area during the construction phase. It also estimates that 612 rooms could be available for use during this period. Whilst the area is not a significant tourism hotspot, care must be taken to ensure that there still remains a suitable supply of tourism accommodation for visitors to the area. It would be good to see a plan in place to identify which areas may be best suited to accommodate temporary workers and how the peak will be managed.	In ES Volume 1, Chapter 14 – Socio-Economics [APP-050], the sensitivity of the temporary accommodation market receptor is assessed as low, reflecting the availability of options (Table 14.4 of the ES Volume 1, Chapter 14 – Socio-Economics [APP-050]). Given the magnitudes of impact – Medium in the Construction Phase and Low in the Operation and Maintenance Phase – the Scheme is considered to have Minor Adverse effects in both phases. These effects are not significant in EIA terms, reflecting the relative availability of rooms and the accommodation requirements that would arise even in a worst-case scenario.
SCC-032	Socio-Economics	3.27 There will be very little visual blight resulting from the construction phase and little impact on any local tourism attractions. It would be good to see consideration given as	The Applicant welcomes this comment.

ID	Theme	Representation	Applicant's Response
		to how the wider Norfolk and East Suffolk/ Waveney Valley tourism economy sector can work with the applicants to ensure that the visitor economy remains buoyant during and after the main construction phase.	
SCC-033	Cumulative Impact Socio-Economics	3.28 Cumulative impacts. As with section 2.7, it would be good to see an acknowledgement of the timing of this scheme and its likely overlap with other NSIPs such as Sizewell C, Ecopower, Sea Link, Norwich to Tilbury etc. Whilst there is some distance geographically from some of these schemes, there is nevertheless the potential for cumulative impacts in the effect on tourism accommodation, traffic etc	The Applicant is aware of other projects in the region. The technical chapters of ES Volume 1 [APP-042 to 054] present an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders to understand and, where practicable, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination.
SCC-034	Transport and Access	Study Area 4.1 [APP-094] (6.2.11.1 Environmental Statement Volume 2: Figure 11.1 Indicative	Construction vehicle routeing, as detailed in ES Volume 1, Chapter 11 – Transport and Access [APP-047] , shows that a proportion of construction

ID	Theme	Representation	Applicant's Response
		Transport and Access Study Area) shows the indicative study area as along the A140 and the B1332 (north of Bungay). Whilst these roads are in Norfolk, SCC would require detail of any roads within Suffolk which construction vehicles may travel along, such as the A143 and the A140 south of Diss. The details of this should be included in the outline Construction Traffic Management Plan (CTMP).	vehicles will travel south on A140 and B1332. The origin of construction vehicles, including HGVs and staff, is not known at this stage, however consideration has been given for vehicles to access the Strategic Road Network (SRN). Table 6.3 of the ES Volume 3, Appendix 11.1 – Transport Assessment Part 1 [APP-174] details the trip distribution of construction vehicles on the highway network. In addition, a Technical Note provided to National Highways, details in diagrammatic format the assumptions made with regards to the trip distribution and is shown in Appendix B (page 86) of the ES Volume 3, Appendix 11.1 – Transport Assessment Part 1 [APP-174]. These assumptions align with the calculations and assessment within ES Volume 1, Chapter 11 – Transport and Access [APP-047] Based on these trip distribution assumptions, some vehicles are anticipated to travel via A143 and A140, in order to access the site from A11 and A14 which are part of the SRN. A Technical Note prepared with regards to transport impacts in relation to the SRN is detailed in Appendix B.4 of the ES Volume 3, Appendix 11.1 – Transport Assessment Part 1 [APP-174]. Within this document, Section 1.3 identifies the trip distribution assumptions made on A140 and B1332, as stated:

ID	Theme	Representation	Applicant's Response
			- On A140: 50% of HGVs will access from the north, 50% will access from the south - On A140: 75% of cars/shuttles/LGVs will access from the north, 25% from the south - On B1332: 100% of HGVs will access from the north - On B1332: 75% of cars/shuttles/LGVs will access from the north, 25% from the south These trip distribution assumptions are aligned with the calculations and management and mitigation measures detailed within the Outline CTMP [APP-201].
SCC-035	Transport and Access	4.2 SCC is concerned that no mention of potential construction traffic routes through Suffolk has been made in any documentation, and that the study area does not extend to the Suffolk highway network or the Strategic Road Network. The outline CTMP should clarify whether construction traffic routes will go through Suffolk or not.	Construction vehicle routeing, as detailed in ES Volume 1: Chapter 11 – Transport and Access [APP-047], shows that a proportion of construction vehicles will travel south on A140 and B1332. Some vehicles are anticipated to access via A143 and A140, in order to access the site from A11 and A14 which are part of the SRN. The origin of construction vehicles is not known at this stage, however assumptions have been made with regards to trip distribution on A140 and B1132, and is detailed in Appendix B.4 of the ES Volume 3, Appendix 11.1 –Transport Assessment Part 1 [APP-174]. These trip distribution assumptions are aligned with the calculations and management and

ID	Theme	Representation	Applicant's Response
			mitigation measures detailed within the Outline CTMP [APP-201] .
SCC-036	Transport and Access Cumulative Impact	4.3 The Council is also concerned about the potential cumulative impacts of a number of NSIPs adjacent to the A140 being delivered concurrently, including Norwich to Tilbury and Ecopower Solar Farm. Further information is required for SCC as the Local Highway Authority for Suffolk to understand the potential cumulative impacts of these schemes which appear likely to be constructed concurrently.	Section 11.11 of ES Volume 1, Chapter 11 – Transport and Access [APP-047] provides an assessment of cumulative effects relating to traffic and transport. This includes an assessment of A140 and B1332. The analysis indicated the only link requiring further assessment is A140 to the south of B1527 Hempnall Roundabout. The summary of significance of effects at this location evidenced that there are no significant adverse effects on this link with respects to severance, delay, amenity, fear and intimidation, safety and hazardous loads. In addition to this, it is noted within ES Volume 1, Chapter 11 – Transport and Access [APP-047] that cumulative development flows represent a worst-case scenario as peak construction years for assessed developments do not overlap, and in reality, flows will be lower. Given this assessment, it is considered that the combined development + cumulative effects on the primary north to south links used (A140 and B1332) are not significant. Therefore, effects on links to the south of A140 and B1332 are also not considered significant and not requiring further assessment.

ID	Theme	Representation	Applicant's Response
SCC-037	Transport and Access	Abnormal Load Movements 4.4 The oCTMP [APP-201] states in section 6.2.1 that "AIL for transformers and cable drums will be delivered by sea to ports at Felixstowe or Kings Lynn. The final port of entry is still under consideration based on routeing analysis and will be confirmed in the detailed CTMP". If transformers are brought in through the port of Felixstowe, then they will likely be transported along the A140 in Suffolk. As such SCC would encourage further discussions as there is a weight restriction on the bridge at Brockford on the A140.	The ES Volume 3, Appendix 11.1 – Transport Assessment Part 1 [APP-174] and Outline CTMP [APP-201] provide an overview of the anticipated routeing for AILs on the Local Road Network (LRN). An AIL report has also been prepared and is detailed in Appendix D of the Transport Assessment (Part 3) [APP-176]. The AIL report provides an overview of potential routeing and access points onto the SRN. Routeing proposals are designed in alignment with access being made via a suitable nearest port of entry. Some AIL movements therefore may be required to arrive from the south of the site. As set out in the Outline CTMP [APP-201], all AIL movements will be managed by a specialist haulage contractor, and traffic management arrangements will be agreed in advance with National Highways (NH), relevant Local Highway Authorities (LHA), structures' owners and the Police where necessary. This includes if / where any AIL movements will be required along A140 in Suffolk. This will be set out and agreed in the detailed CTMP to be secured under Requirement 15 of the Draft DCO [AS-032].
SCC-038	Transport and Access	4.5 SCC's Supplementary Guidance Document for Traffic and Transport sets out what it expects from NSIP developers in terms of early engagement and information	An AIL report has also been prepared and is detailed in Appendix D of the Transport Assessment Part 3 [APP-176]. The AIL report provides a more detailed overview of proposed

ID	Theme	Representation	Applicant's Response
		provided in the application in relation to AILs. This guidance states: <i>4.6 For movement of AILs, there is the necessity for early liaison with the relevant highway authority's structures team to ensure that all necessary surveys, assessments and where relevant strengthening of structures can be completed before movement of such loads are required.</i> <i>4.7 As a minimum, SCC expects applicants to show a feasible route from a point of origin (SRN or Port) and the site. Such route study should identify the largest load required and consider matters such as structural capacity of bridges and swept paths. The latter must be within the highway boundary or the order limits to avoid oversailing of third-party land.</i> 4.8 Appropriate arrangements will have to be made with Suffolk Constabulary, including for recovery of their costs, should AILs be transported from Felixstowe.	routing and access points onto the SRN. Some AIL movements may be required to arrive from the south of the site. As detailed in the Outline CTMP [APP-201], all AIL movements will be managed by a specialist haulage contractor, and traffic management arrangements will be agreed in advance with NH, relevant Local Highway Authorities (LHA), structures' owners and the Police where necessary. This includes where any AIL movements will be required along A140 in Suffolk, if it is required. The Applicant notes that appropriate arrangements will be made with Suffolk Constabulary, should AILs be transported from Felixstowe. This will be set out and agreed in the detailed Construction Traffic Management Plan to be secured under Requirement 15 of the Draft DCO [AS-032].
SCC-039	Transport and Access	4.9 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,	As detailed in the Outline CTMP [APP-201] , all AIL movements will be managed by a specialist haulage contractor, and traffic management arrangements will be agreed in advance with NH,

ID	Theme	Representation	Applicant's Response
		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.	relevant Local Highway Authorities (LHA), structures' owners and the Police where necessary. This includes where any AIL movements maybe required along A140 in Suffolk. Structural suitability would be verified through the AIL route approval process, including detailed assessments where required by the relevant highway and structure authorities. Through this process, any necessary mitigation measures would be identified and agreed prior to movement. In addition, condition surveys may be undertaken where requested by the relevant authority, and any damage attributable to the Scheme would be remedied by the Applicant. The Applicant therefore considers that existing regulatory and approval processes provide an appropriate mechanism to manage potential impacts on highway structures. The Applicant is aware of the bridge on A140 in Brockford and associated challenges and will assess the impact with regards to any AIL movements required as needed. This will be set out and agreed in the detailed Construction Traffic Management Plan to be secured under Requirement 15 of the Draft DCO [AS-032].
SCC-040	Transport and Access	4.10 It is stated in paragraph 6.1.3 of the oCTMP [APP-201] that routing plans can be found in Appendix A of the oCTMP. However,	The Applicant acknowledges that routeing plans have not yet been defined for AILs routed to the south of the site, within the suite of documents

ID	Theme	Representation	Applicant's Response
		no routing plans for AILs travelling from Felixstowe have been included. Since Felixstowe is one of the potential ports for deliveries of cable drums and transformers, this route should be included.	submitted with the DCO Application. An assessment has been undertaken for these sections of roads, and the Applicant is aware of the bridge on A140 and associated challenges for routeing. The Applicant will seek to continue engagement with SCC to provide further information on AIL routeing and its development. This will be set out and agreed in the detailed Construction Traffic Management Plan to be secured under Requirement 15 of the Draft DCO [AS-032] .
SCC-041	Transport and Access	4.11 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.	The Applicant acknowledges that routeing plans have not yet been defined for AILs routed to the south of the site, within the suite of documents submitted with the DCO Application. An assessment has been undertaken for these sections of roads and associated challenges for routeing. The Applicant will seek to continue engagement with SCC to provide further information on AIL routeing and its development. This will be set out and agreed in the detailed Construction Traffic Management Plan to be secured under Requirement 15 of the Draft DCO [AS-032] .
SCC-042	Transport and Access	4.12 SCC has published a Traffic and Transport Supplementary Guidance Document to its Energy and Climate Adaptive Infrastructure Policy, which outlines SCC's	The Applicant has considered the Supplementary Planning Guidance on Traffic and Transport prepared by SCC (document dated January 2025), and notes the comments made. The assessment

ID	Theme	Representation	Applicant's Response
		expectations for pre-application engagement between the promoter and the Local Highway Authority. 4.13 SCC defers to NCC for other traffic and transport matters as the LHA for this project.	detailed within ES Volume 1 Chapter 11 - Transport and Access [APP-047], ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177], and Outline CTMP [APP-201] have been informed by relevant policy and aligns with the Supplementary Planning Guidance prepared by SCC. The Applicant acknowledges that other traffic and transport matters defer to NCC as the Local Highway Authority.

2.4 East Suffolk Council

Table 2.4 Applicant's Response to East Suffolk Council [[RR-0526](#)]

ID	Theme	Representation	Applicant's Response
ESC-001	General remarks	East Suffolk Council (ESC) is a neighbouring authority to the proposed East Pye Solar project, noting that the order limits do not fall within the East Suffolk District, and no infrastructure is therefore proposed within ESC. On that basis, ESC's interest primarily relates to the consideration of cumulative impacts, however some additional high-level commentary is also provided on other topic areas where this may be useful to the Examining Authority. ESC defers detailed technical comments to the host authorities.	The Applicant notes this comment and responds to the specific points made by the Council below.
ESC-002	Examination process	ESC will continue to monitor the topics discussed within this Relevant Representation throughout the DCO examination period. Our attendance at hearings is not expected to be required, with any related matters being dealt with via written representations as deemed necessary over the course of the DCO examination period.	The Applicant notes this comment.

ID	Theme	Representation	Applicant's Response
		ESC submitted a Relevant Representation letter by email which has been sent directly to PINS and should be attached to this form.	
ESC-003	Consultation and engagement	1.2. ESC also notes that the proposed scheme is due to be located south of Norwich and north of Harleston to the east of Long Stratton and with an additional cluster located south of Great Moulton, in South Norfolk. The proposed Order Limits for the 1,212.3-hectare East Pye Solar project do not fall within the East Suffolk district, and no physical infrastructure is proposed within ESC's administrative boundary. ESC is therefore a neighbouring authority, and not a host authority. Consequently, ESC defers all detailed, site-specific technical and localized environmental comments to the relevant host authorities.	The Applicant notes ESC's confirmation that the Scheme and its Order Limits are not located within its jurisdiction.
ESC-004	Consultation and engagement Cumulative impact	1.3. The applicant contacted ESC as a prescribed consultee under Section 42(1)a and b of the 2008 Act, in accordance with section 43 'local authorities for the purpose of section 42(1)b'. ESC is a neighbouring authority and not one within the primary study areas in the Preliminary Environmental Information Report (PEIR), noting that the order limits do not fall within the East Suffolk District and no infrastructure is therefore	The applicant notes this comment and welcome ongoing engagement with ESC. The Applicant notes previous engagement with the Scheme during the EIA Scoping Consultation.

ID	Theme	Representation	Applicant's Response
		proposed within ESC. On that basis, ESC's interest primarily relates to the consideration of cumulative impacts, however some additional high-level commentary is also provided on other topic areas where this may be useful to the Examining Authority. ESC defers detailed technical comments to the host authorities. 1.4. ESC's previous engagement with the project includes its response to the EIA Scoping consultation (12th February 2025). While the project is outside of the ESC administrative area, it intends to monitor project progress given potential regional and cumulative implications.	
ESC-005	Cumulative impact	Cumulative impacts 2.1.ESC acknowledges that renewable energy will play a central role in tackling climate change and in meeting Government targets in the lead up to Net Zero by 2050. The move towards the delivery of low carbon and renewable sources of energy will only be achieved if developments such as the East Pye Solar project are only permitted to advance once they have first taken into account the very real impacts they will have on the landscape, natural environment and	The Environmental Statement provides a full environmental assessment in accordance with relevant legislation and guidance. Of particular relevance to the assessment of effects on local communities and mitigation measures are set out in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], Chapter 11 – Transport and Access [APP-047], Chapter 12 – Noise and Vibration [APP-048], Chapter 13 – Air Quality [APP-049], Chapter 14 - Socio-Economics [APP-050], and Chapter 18 - Other Environmental Matters [APP-054]. A summary of significant residual effects and cumulative effects is provided

ID	Theme	Representation	Applicant's Response
		local communities set to host or neighbour such development. Consideration must also be given to all possible cumulative and incombination effects both current and proposed, created by other projects which have a spatial relationship with the proposed project.	in ES Volume 1, Chapter 20 –Summary of Residual Significant Effects [APP-056]. ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects from other environmental topics. The Applicant is aware of other projects in the region. The technical chapters of ES Volume 1 [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. Significant cumulative effects have been identified in relation to: • ES Volume 1, Chapter 9 – Water Environment [APP-045] assesses a potential significant cumulative beneficial effect with other solar schemes through cessation of agricultural activities in terms of water quality. • ES Volume 1, Chapter 14 – Socioeconomics [APP-050] assesses a significant cumulative beneficial effect on jobs, employment and the supply chain, and skills and the labour market.

ID	Theme	Representation	Applicant's Response
			• ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] assesses a moderate adverse and significant cumulative effect on loss of Best and Most Versatile agricultural land. • ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] assesses a moderate adverse and significant effect in relation to hazardous waste capacity during operation and decommissioning. Additional mitigation for this cumulative effect includes implementation of the Operational and Decommissioning Site Waste Management Plans, and a coordinated approach between site operators of relevant NSIPs to reduce any potential overloading of hazardous waste facilities. The Secretary of State will balance potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy. The planning balance considering the positive, neutral and negative impacts are set out in the Planning Statement [APP-209]. The Applicant acknowledges the need for early co-ordination between developers, local authorities

ID	Theme	Representation	Applicant's Response
			and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders to understand and, where possible, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination.
ESC-006	Cumulative impact	2.2.ESC is supportive of fully developed, well-designed and coordinated projects that enable the goal of Net Zero and the interim targets, as set out in the revised National Policy Statements (NPSs) for Energy Infrastructure. However, over the last decade, ESC has been subject to numerous energy infrastructure projects, all delivered in a piecemeal fashion with little or no regard for the cumulative and in-combination impacts that these projects have cumulatively and sequentially forced upon the district. The constant barrage of large-scale energy infrastructure projects upon rural areas of East Anglia cannot continue to occur at the expense of its environment and communities. Cumulative project impacts are wide reaching beyond a project's order limits and ESC	The Applicant refers to its response to ESC-005.

ID	Theme	Representation	Applicant's Response
		wishes to highlight its recent experiences in this regard for the benefit of neighbouring host authorities.	
ESC-007	Cumulative impact	2.3. ESC has faced a succession of individual proposals including ScottishPower Renewable's East Anglia ONE offshore wind farm, East Anglia THREE offshore wind farm, East Anglia ONE North offshore wind farm, East Anglia TWO offshore wind farm, SZC Co.'s Sizewell C new nuclear power station, and potentially now, National Grid Electricity Transmission (NGET) Sea Link and National Grid Ventures (NGV) LionLink if consented. These projects collectively are impacting our communities without visible strategic oversight, or collaboration to minimise impacts, and this clearly creates a very challenging, unsustainable, and unacceptable situation. There are additional projects which are beyond the East Suffolk area, but within the wider region which should also be given full consideration, such as the NGET Norwich to Tilbury reinforcement project and the offshore wind farm projects located around the Greater Wash area which have an onshore grid connection in proximity to the East Pye Solar project (i.e. the Norwich Main 400kV substation for example).	The Applicant refers to its response to ESC-005.

ID	Theme	Representation	Applicant's Response
ESC-008	Cumulative impacts	2.4. The potential for cumulative impacts from any/all other national infrastructure projects in the wider vicinity must therefore be fully considered due to the broad reach of such impacts upon host and neighbouring authorities. While the direct impacts of East Pye Solar are outside East Suffolk's district, the temporal and spatial overlap of multiple major energy projects puts collective pressure on the regional supply chain, skills sector, and labour market. ESC emphasises that the cumulative socio-environmental impacts of these combined energy projects across the wider Norfolk and Suffolk region must be managed. The full cumulative effects of the project in combination with other consented and planned NSIPs must be fully and robustly assessed.	The Applicant refers to its response to ESC-005.
ESC-009	Cumulative impact	2.5. ESC continues to reiterate the importance of thorough assessment of cumulative impacts of largescale energy infrastructure projects. Suffolk, and East Suffolk in particular, is host to multiple consented, planned, and known NSIPs which are likely to have both spatial and temporal overlap with other projects across County and district boundaries. As such, proper and	The Applicant refers to its response to ESC-005.

ID	Theme	Representation	Applicant's Response
		reasoned assessment of cumulative impacts is imperative. 2.6. This is reflected in East Suffolk Council's Suffolk Coastal Local Plan 2020 within Policy SCLP3.4: 'Proposals for Major Energy Infrastructure Projects'. This requires consideration of the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime, including decommissioning of existing plant and facilities. All opportunities to minimise the adverse impacts should be explored and where appropriate, sufficient mitigation and compensation provided. Similarly, East Suffolk Council's Waveney Local Plan 2019 states within Policy WLP8.27: 'Renewable Energy and Low Carbon Energy' that renewable and low carbon energy will be supported where significant adverse effects on the amenities of nearby properties or businesses are avoided and that there are no adverse safety impacts and no significant adverse effects on the transport network. Cumulative effects and the impact of ancillary infrastructure should also form part of the assessment, and when the technology is no longer operational there is a requirement to	

ID	Theme	Representation	Applicant's Response
		decommission, remove the facility and complete a restoration of the site to its original condition. The principles set out within these Local Plan policies are equally applicable for large scale projects including NSIP scale developments, with Local Development Plan policy requirements being a material planning consideration when viewed in parallel to the primary legislation and guidance contained within the Energy NPS documents.	
ESC-010	Cumulative impacts Construction	2.7. There is potential for both spatial and temporal overlap of the project's construction period with that of other NSIPs and major developments within East Suffolk but also Suffolk and Norfolk more generally. ESC emphasises that the impact of the project is not evaluated solely within the boundary limits nor in isolation from the wider region, particularly given the multiple consented and emerging NSIPs in both East Suffolk and beyond. It is essential that the project is not considered in isolation and that the full cumulative effects of the project with other projects and proposals is adequately and appropriately assessed, mitigated, and where appropriate, compensated.	The Applicant refers to its response to ESC-005.

ID	Theme	Representation	Applicant's Response
ESC-011	Cumulative impact	2.8. ESC notes that 6.2.2.1 Environmental Statement Volume 2: Figure 2.1 Cumulative Developments [APP-058] applies a 25km buffer to the East Pye Solar order limits to assess cumulative development impacts. This buffer limit lies beyond East Suffolk's known energy NSIPs. None are therefore plotted on this plan, however ESC highlights that the proposed NGV Lionlink project (in particular the High Voltage Direct Current (HVDC) cable route between Southwold and Halesworth) would be the closest point geographically (if consented), with the project making landfall at Walberswick. The LionLink project is currently in the pre-application stage of the DCO consenting process and any interactions between the projects in this region should be assessed.	The approach to the cumulative effects assessment is set out within the Environmental Statement, with a 25km buffer applied to the Order Limits as shown in ES Volume 2, Figure 2.1 - Cumulative Developments [APP-058]. The Zones of Influence for each environmental topic area were identified to determine the search area, with the largest Zone of Influence being 25km. The cumulative developments identified in Table 1.4 of ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116] have been discussed with relevant consultees through the scoping opinion and statutory consultation. The Applicant acknowledges that parts of the LionLink cable route lies within the 25km buffer applied to the East Pye Solar Order Limits. However, the majority of the above ground infrastructure proposed for LionLink is located outside of this 25km buffer, including the Kiln Lane Substation extension and the new Converter Substation east of Saxmundham. Notably, the cumulative effects assessment presented in Chapter 28 of the LionLink Preliminary Environmental Information Report (PEIR) does not identify East Pye Solar as a scheme to be taken forward for cumulative assessment either which aligns with the position taken by the Applicant.

ID	Theme	Representation	Applicant's Response
			The LionLink PEIR identifies potentially significant effects associated with the onshore elements of that project with respect to agricultural land and soils. Potential effects identified are associated with the potential temporary loss of agricultural land during construction associated with the Kiln Lane Substation, Converter Station and associated permanent access roads. The LionLink project is in an adjacent county and as such, the consideration of the significance of effect would be at the national level and as such there is not considered to be a significant cumulative effect. The LionLink PEIR also identifies potentially significant landscape and visual effects, with most adverse effects are expected to reduce over time as mitigation planting becomes established and land is restored, with most effects anticipated to be minor or negligible by year 15 of operation, though significant effects may remain in the vicinity of permanent infrastructure including the Kiln Lane Substation and within some Landscape Character Areas where vegetation removal is required and cannot be fully replaced. Due to the over 20km distance between the sites, there is no potential for a significant cumulative effect. The preliminary traffic and transport assessment for LionLink identifies the potential for significant effects during construction on a limited number of

ID	Theme	Representation	Applicant's Response
			road links and junctions relating to congestion, delays, highway safety, traffic severance and impacts on pedestrian and cyclist amenity, with temporary diversions of public rights of way potentially giving rise to significant effects, and further mitigation being developed through the EIA process. The East Pye Solar cumulative transport assessment is presented within Section 11.11 of ES Volume 1, Chapter 11 - Transport and Access [APP-047] and considers the potential for cumulative traffic effects with other committed developments using the same parts of the highway network. The cumulative development list with respect to traffic and transport has been prepared in consultation with Norfolk County Council as the Local Highway Authority. LionLink was not included within the agreed cumulative transport assessment. Given the scale and nature of the elements of the Lionlink development within the 25km search area, the effects set out within the LionLink PIER as detailed above, and the lack of interaction with the Scheme, it is considered appropriate and proportionate to exclude LionLink from the cumulative effects assessment on the basis that no significant cumulative effects are likely. The cumulative effects assessment for the Scheme is considered to be robust.

ID	Theme	Representation	Applicant's Response
ESC-012	Biodiversity Net Gain	Biodiversity Net Gain 3.1. ESC notes within East Pye Solar Biodiversity Net Gain Report Revision 1 March 2026 [APP-218] that the project proposes that the Scheme will deliver at least a 10% BNG, with the applicant noting that 'At the time of writing 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.' ESC welcomes the project's target of obtaining at least 10% biodiversity net gain, however, highlights that whilst mandatory BNG for NSIPs is not yet in force (anticipated to become mandatory in November 2026), paragraphs 4.6.1 and 4.6.2 of NPS EN-1 identify that delivering environmental and biodiversity net gains are an important part of development projects. Indeed, the majority of solar related applications submitted to ESC propose BNG levels far higher than 10%. This increased BNG provision is often found to weigh in favour of such proposals when they are considered by local communities.	The Applicant makes note of East Suffolk Council's support for the delivery of a Biodiversity Net Gain in excess of 10%. The Scheme commits to the delivery of a minimum 10% gain as presented in the Biodiversity Net Gain Report [APP-218] and supported by the Biodiversity Net Gain Statutory Metric [APP-219]. This is secured through Requirement 9 of the draft DCO [AS-032]. The biodiversity gain hierarchy has been applied to the Scheme and the BNG assessment, as set out in the Biodiversity Net Gain Report [APP-218]. The Biodiversity Net Gain Report [APP-218] and Biodiversity Net Gain Statutory Metric [APP-219] demonstrate that the Scheme has the capacity to deliver more than 10% gains for habitats, hedgerows and watercourses whilst complying with the DEFRA Metrics' Trading Rules.

ID	Theme	Representation	Applicant's Response
ESC-013	Community benefits	4. Community benefits 4.1. ESC acknowledges that the development of renewable and low carbon energy generation contributes to the government's ambition to reach Net Zero, however, consideration must still be given to the potential impacts this proposal, and other proposed projects, may have on the landscape, natural environment, and local communities set to host such development. Given the scale and rate of infrastructure delivery necessary in the coming years to meet Net Zero ambitions, ESC considers it is important for projects to provide tangible and direct community benefits to communities hosting national infrastructure. 4.2. The benefits of low carbon energy production and distribution are felt nationally, but the potential adverse environmental, social, and cumulative effects are felt at a local scale, by host and neighbouring communities. ESC supports thorough consideration of any potential community benefits scheme as secondary mitigation, in addition to primary and embedded mitigation. ESC continues to encourage applicants to maximise the potential benefits of their projects by seeking to provide a community	The Applicant agrees with the principle of delivering community benefit and notes the suggestion of coordinating community benefits with other schemes and will consider this alongside other feedback received from communities and stakeholders. The Applicant is committed to providing a Community Benefit Fund, as set out in the Planning Statement [APP-209] to allow for community benefits. The Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process). The Applicant will continue engagement post-application, to support the development and delivery of community benefits. The scope and format of this fund will be informed through local engagement, and by the experience of the Applicant's parent company, which is currently setting up an NSIP community benefits fund for another project, having previously provided community benefit funding on smaller-scale projects.

ID	Theme	Representation	Applicant's Response
		legacy benefit, including exploring opportunities to coordinate community benefits with other development projects in the region.	
ESC-014	Examination process	4.3. ESC will continue to monitor the topics discussed within this Relevant Representation throughout the DCO examination period. Our attendance at hearings is not expected to be required, with any related matters being dealt with via written representations as deemed necessary over the course of the DCO examination period. If you would like to discuss any of the comments made in this response further, please do not hesitate to contact the Council using the above contact details.	The Applicant makes note of and welcomes East Suffolk Council's continued participation in the Examination.

2.5 Mid Suffolk District Council

Table 2.5 Applicant's Response to Mid Suffolk District Council [[RR-1359](#)]

ID	Theme	Representation	Applicant's Response
MSDC-001	General remarks	Mid Suffolk District Council (MSDC) welcomes the opportunity to submit this Relevant Representation in relation to East Pye Solar Farm application. This submission builds upon comments previously made during the non-statutory consultation and sets out the key matters that MSDC considers require detailed examination as part of the process. MSDC acknowledges the national importance of renewable energy generation, however, due to the considerable number of Nationally Significant Infrastructure Projects (NSIPs) and other major renewable schemes in the region, the Council must ensure that cumulative impacts are appropriately assessed, mitigated, and coordinated.	The Applicant notes this comment and responds to the specific points made by the Council below.
MSDC-002	Cumulative Impact Socio-Economics	The council acknowledges the contribution the scheme would make to increasing renewable energy generation, required to meet net zero targets. The Council must balance the urgent need for decarbonisation with its responsibility to protect the character, wellbeing, and long-term interests of Mid	The Environmental Statement provides a full environmental assessment in accordance with relevant legislation and guidance. Of particular relevance to the assessment of effects on local communities and mitigation measures are set out in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], Chapter 11 – Transport and

ID	Theme	Representation	Applicant's Response
		Suffolk's communities, environment, heritage assets, agricultural land, and local economy. The district's rural character, historic landscape, and pattern of small settlements are particularly sensitive to large-scale development, and the potential harms arising from the cumulative burden of numerous simultaneous NSIPs in the region are of significant concern. For these reasons, the Council is clear that large-scale renewable development must be strategically planned, appropriately sited, and fully coordinated with other regional NSIPs. The approach must also be supported by robust evidence demonstrating that adverse impacts have been minimised and effectively mitigated. At present, the volume of energy generation, storage and transmission proposals coming forward across the eastern region including several within and around Mid Suffolk, makes a strategic, coordinated approach essential. Without such coordination, there is a real risk of disproportionate and avoidable cumulative effects on local communities, rural settlements, heritage landscapes, biodiversity, local businesses, the agricultural economy, the highway network, construction logistics, and the capacity of the local housing	Access [APP-047], Chapter 12 – Noise and Vibration [APP-048], Chapter 13 – Air Quality [APP-049], Chapter 14 - Socio-Economics [APP-050], and Chapter 18 - Other Environmental Matters [APP-054]. An assessment of effects on heritage assets is presented in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], and agricultural land in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The proposed management and mitigation measures set out in the ES [APP-036 to APP-195] and are secured through various outline management plans [APP-196 to APP-205]. The Applicant is aware of other projects in the region. The technical chapters of the ES Volume 1 [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Secretary of State will balance potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy. The planning balance considering the positive, neutral and negative impacts are set out in the Planning Statement

ID	Theme	Representation	Applicant's Response
		and tourism sectors to absorb temporary workforces.	[APP-209]. Evidence for the need for the Scheme is set out in the Statement of Need [APP-206]. The site selection process is described in the Site Selection Assessment [APP-215] considers different potential development areas and alternative development zones for the Scheme and presents how each of those areas perform against a number of factors. Consideration was also given to a number of alternative locations for the new National Grid Substation, and these are summarised in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders to understand and, where possible, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination.
MSDC-003	Statement of Need	While the Council remains open to supporting well-designed renewable energy schemes,	The Environmental Statement provides a full environmental assessment in accordance with

ID	Theme	Representation	Applicant's Response
	Cumulative Impact	acceptance depends on the applicant demonstrating that environmental and heritage impacts have been fully and transparently assessed, that cumulative impacts have been modelled realistically, and that proposed mitigation is deliverable, enforceable and secured. The Council also expects developers to show how their proposals will integrate with a wider, coordinated approach to infrastructure delivery in the region rather than contributing to piecemeal pressure on sensitive landscapes and communities. This position reflects the Council's commitment to both climate action and the long-term protection of Mid Suffolk's communities and landscapes.	relevant legislation and guidance. An assessment of effects on heritage assets is presented in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]. The proposed management and mitigation measures set out in the ES [APP-036 to APP-195] and are secured through various outline management plans [APP-196 to APP-205]. The Applicant is aware of other projects in the region. The technical chapters of the ES [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Statement of Need [APP-206] explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme. The Clean Power 2030 Action Plan paves the way for new strategic plans for development of the GB energy system. The Connections Action Plan is clear that NESO's Connections Reform process and NESO's longer term strategic network and system planning processes must be aligned to ensure the overall network remains optimally

ID	Theme	Representation	Applicant's Response
			planned. It is therefore expected that NESO's strategic plans build upon their own connections queue prioritisations to deliver coherent and consistent recommendations to deliver the Clean Power target on the way to achieving net zero. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders to understand and, where possible, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination.
MSDC-004	Transport and Access Cumulative Impact	Transport and Construction Logistics Port of Entry and Freight Routing MSDC notes that the Applicant has not confirmed the intended port of entry for the delivery of major components. This lack of certainty limits the robustness of any construction traffic modelling and prevents a complete understanding of transport impacts. We would have concerns if port of entry was Ipswich or	The Transport Assessment [APP-174] and Outline CTMP [APP-201] provide an overview of the anticipated routeing for AILs on the Local Road Network (LRN). An AIL report has also been prepared and is detailed in Appendix D of the Transport Assessment (Part 3) [APP-176]. The AIL report provides a more detailed overview of proposed routeing and access points onto the SRN. Routeing proposals are designed in alignment with access being made via a suitable

ID	Theme	Representation	Applicant's Response
		Felixstowe and would therefore be heavily reliant on the A140. The following information should be provided: • Confirmation of the specific port(s) to be used. • A complete end-to-end freight routing strategy, including movements from port to site. • Details of AIL routing which should avoid the A140 at Brockford, necessitating overbridging and resulting in significant disruption for this part of Mid Suffolk. • Evidence that the A14, A140, and local distributor roads within Mid Suffolk can accommodate the cumulative pressures from regional NSIPs during overlapping construction periods.	nearest port of entry. Some AIL movements therefore may be required to arrive from the south of the site. As detailed in the Outline CTMP [APP-201], all AIL movements will be managed by a specialist haulage contractor, and traffic management arrangements will be agreed in advance with NH, relevant Local Highway Authorities (LHA), structures' owners and the Police where necessary. This includes if / where any AIL movements will be required along A140 in Suffolk. This will be set out and agreed in the detailed Construction Traffic Management Plan to be secured under Requirement 15 of the Draft DCO [AS-032].
MSDC-005	Transport and Access Cumulative Impact	Cumulative Transport Impacts Mid Suffolk is within a region seeing the delivery of multiple concurrent infrastructure schemes. Together, these may generate significant cumulative construction traffic pressures. The following information should be provided:	Section 11.11 of ES Volume 1, Chapter 11 – Transport and Access [APP-047] provides an assessment of cumulative effects relating to traffic and transport. This includes an assessment of A140 and B1332, alongside potential constraints on the road network, including an overview of existing road characteristics and baseline traffic flows. As shown, the only link requiring further

ID	Theme	Representation	Applicant's Response
		• A revised cumulative transport assessment using realistic build-out assumptions for other interrelated NSIPs and large-scale developments. • Clear identification of pinch points, peak construction overlaps, resulting impacts and adequate mitigation. • A robust Construction Traffic Management Plan (CTMP) that includes enforceable conditions and cross-project coordination.	assessment is A140 to the south of B1527 Hempnall Roundabout. The assessment of likely significant effects at this location evidence that there are no significant adverse effects on this link with respects to severance, delay, amenity, fear and intimidation, safety and hazardous loads. In addition to this, it is noted within ES Volume 1, Chapter 11 – Transport and Access [APP-047] that cumulative development flows represent a worst-case scenario as peak construction years for assessed developments do not overlap, and in reality, flows will be lower. As stated in Section 10 of the Transport Assessment [APP-174], cumulative schemes have been agreed with Norfolk County Council and comprise of developments which are not already inherent within the TEMPro growth factors used to establish the future baseline forecasts. Trip generation for cumulative developments has been collected from available documentation published online or publicly available, or through engaging with the relevant development teams where practicable. A detailed Construction Traffic Management Plan, largely in accordance with the Outline CTMP [APP-201], to be secured under Requirement 15 of

ID	Theme	Representation	Applicant's Response
			the Draft DCO [AS-032] , will be developed and agreed with the relevant Local Highway Authorities (LHA).
MSDC-006	Socio-Economics Cumulative Impacts	Workforce Accommodation and Socio-Economic Effects Labour Catchment Area Pressures Mid Suffolk sits within the wider Labour Catchment Area for several major NSIPs and largescale development projects. MSDC remains concerned about the potential cumulative demand for temporary accommodation, with associated risks including: • Pressure on tourism accommodation stock; • Competition for private rental properties, potentially restricting access for local households; • Increased affordability challenges for Mid Suffolk residents. • Appropriate and effective social integration of temporary workforce populations The following information should be provided:	ES Volume 1, Chapter 14 – Socio-Economics [APP-050] provides a breakdown of the workforce and where it is expected to originate from, with resulting effects on the temporary accommodation market. The cumulative assessment covers the temporary accommodation market, but the private rented market is outside the scope of the assessment; it is considered much more likely that construction workers would seek to stay in hotels, B&B, and AirBnBs. The assessment concludes that there will be a Minor Adverse cumulative effect on the temporary accommodation market in South Norfolk during the construction phase. This follows from the Assessment of likely significant effects, which finds that – in a reasonable worst-case scenario – 360 construction workers may need to seek temporary accommodation during peak construction activity. The baseline data shows that there are an estimated 734 available rooms within South Norfolk. This is based on data from CoStar and Airbtics on the inventory and average occupancy of temporary accommodation. There are an estimated 129 temporary accommodation

ID	Theme	Representation	Applicant's Response
		- A fully detailed breakdown of workforce size, duration, and accommodation needs; - A cumulative assessment of impacts on the tourism and private rental sectors; - Appropriate mitigation measures, including coordination with other developments, consideration of temporary accommodation solutions and appropriate management of social integration issues.	lets and 605 rooms available as single listings (i.e. AirBnBs) unoccupied on average (see 14.6.33-38 of ES Volume 1, Chapter 14 – Socio-Economics [APP-050]). This indicates that there is availability to accommodate the scheme's workforce while leaving rooms available.
MSDC-007	Cumulative Impact	Cross-Project Coordination Given the extraordinary scale of infrastructure delivery across Suffolk and the wider region, MSDC emphasises the need for early coordination between developers, local authorities, and agencies involved in other NSIPs and large-scale developments to manage cumulative accommodation and labour market pressures effectively.	The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders to understand and, where possible, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination.
MSDC-008	Cumulative Impact	Adequacy of the Cumulative Impact Assessment MSDC continues to have concerns regarding the adequacy and methodological robustness of the cumulative impact assessment (CIA).	The Applicant refers to its response to MSDC-002.

ID	Theme	Representation	Applicant's Response
		In particular, the CIA must: • Incorporate up-to-date construction programmes from all relevant NSIPs and large-scale developments; • Provide transparent assumptions regarding construction period overlaps; • Demonstrate that cumulative traffic, accommodation, environmental, and socio-economic impacts have been assessed consistently and comprehensively; • Assign responsibility for delivering mitigation where cumulative effects are significant.	
MSDC-009	Cumulative Impact	Having reviewed the Cumulative Effects Assessment, Mid Suffolk District Council notes the omission of several developments, which we consider should be included: DC/23/02362 - Land North of Lion Road Palgrave Part In The Parishes Of Wortham And Diss DC/23/05426 - Land North Of Lion Road, Palgrave, Part In The Parishes Of Wortham And Diss	The Applicant notes the developments identified by Mid Suffolk District Council. The approach to the Cumulative Effects Assessment (CEA) is set out in ES Volume 1, Chapter 2 - EIA Methodology [APP-020] and is supported by ES Volume 3, Appendix 2.1 - EIA Scoping Report [APP-051] and ES Volume 3, Appendix 2.4- Cumulative Schemes [APP-054]. As set out in the ES Volume 3, Appendix 2.1 - EIA Scoping Report [APP-051], a 10km search area was applied for the identification of TCPA applications to inform the long list of cumulative developments, consistent

ID	Theme	Representation	Applicant's Response
		DC/22/02667 - Grange Farm Old Bury Road Palgrave Suffolk IP22 1AZ DC/24/05535 - Land South Of Eye Airfield Industrial Estate Castleton Way Yaxley Suffolk IP23 8AW DC/25/02562 - Land East Of Mellis Road Approximately 470 M West Of Yaxley Substation IP21 4BT DC/25/02824 - Land West Of A140 Red House Farm Yaxley IP23 8BH DC/25/05021 - Cranswick House Oaksmere Business Park Eye Airfield Industrial Estate Yaxley IP23 8BW DC/25/03257 - Land At Stone Cottages Bury Road Botesdale IP22 1QH	with the four-stage PINS methodology of establishing a long list, shortlist, information gathering and assessment. The cumulative developments identified in Table 1.4 of ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116] have been discussed with relevant consultees through the scoping opinion and statutory consultation. The Applicant draws attention to the fact that each of the eight TCPA applications identified fall outside of this 10km search area and had therefore not been included in the cumulative effects assessment. Although there is no specified distance from a scheme which may give rise to potentially-cumulative effects with another scheme in the EIA Regulations, these distances are considered to be sufficient for an appropriate assessment of the cumulative effects of this Scheme. Using professional judgement, cumulative schemes have been screened for their potential to result in cumulative effects with the Scheme: only those where such potential exists have been included within the short list of cumulative schemes for assessment within the ES.
MSDC-010	Concluding remarks	Conclusion Mid Suffolk District Council supports the transition to renewable energy but considers that several matters must be clarified or mitigated before the project can be considered acceptable. These include:	The Applicant notes this comment.

ID	Theme	Representation	Applicant's Response
		• Transport routing and cumulative network impacts; • Workforce accommodation pressures; • Adequacy of the cumulative impact assessment. MSDC respectfully requests that the Examining Authority explores these matters fully during the Examination and reserves the right to provide further detailed submissions as the process progresses.	