



East Pye Solar
The 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

September 2026

Planning Inspectorate Reference: EN0110014

Examination Document Reference: EXAM/8.7

The Infrastructure Planning (Examination Procedure) Rules 2010 Rules
8(1)(c)(i)

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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 statutory bodies, undertakers and notable parties with whom the Applicant is seeking a Statement of Common Ground.
- 1.1.4 The Applicant's **Planning Statement [APP-209]** presented the following Interested Parties it wished to enter into a Statement of Common Ground during the examination of the Application:
- Anglian Water Services;
 - Environment Agency;
 - Historic England;
 - National Grid Electricity Transmission Plc; and
 - National Highways;
 - Natural England;
 - Norfolk County Council;
 - Norfolk Wildlife Trust; and
 - South Norfolk Council.
- 1.1.5 The Examining Authority in the **Rule 6 Letter [PD-005]** advised the Applicant to enter into Statements of Common Ground with the following Interested Parties:
- General Aviation Awareness Council and Norfolk Gliding Club; and

- National Gas Transmission Plc.
- 1.1.6 The Applicant has provided its response to the RRs submitted by Norfolk County Council and South Norfolk Council in **The Applicant's Response to Relevant Representations Part 1: Host and Neighbouring Local Authorities [EN0110014/EXAM/8.6]**, submitted at Procedural Deadline A (1 September 2026).
- 1.1.7 This document 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:
- **The Applicant's Response to Relevant Representations Part 1: Host and Neighbouring Local Authorities [EN0110014/EXAM/8.6];**
 - **The Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [EN0110014/EXAM/8.8];**
 - **The Applicant's Response to Relevant Representations Part 4: Parish and Town Councils, Parish Meetings and MPs [EN0110014/EXAM/8.9];** and
 - **The Applicant's Response to Relevant Representations Part 5: By Theme [EN0110014/EXAM/8.10].**
- 1.1.8 In this document, the Applicant has identified a number of Interested Parties as Notable Parties. These comprise those Interested Parties that have also been identified by the Planning Inspectorate as 'non-statutory organisations' for the purposes of the Examination. The characterisation is intended solely to assist the organisation and cross-referencing of the Applicant's response and should not be interpreted as indicating any hierarchy of Interested Parties or the relative merit of any representation.
- 1.1.9 The Applicant has considered all RRs received and has sought to respond to the matters raised irrespective of whether the Interested Party has been identified as a Notable Party.

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-038]**.

- **Table 1.2** lists the statutory consultees, undertakers and notable parties that have submitted RRs and with whom the Applicant is seeking to undertake a Statement of Common Ground. A link to the Relevant Representation submission made by each party is linked. Each submission can be found within the [Relevant Representation Library](#) (published on 6 July 2026).
 - These submissions are presented and responded to 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

Reference	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 Relevant Representations responded to in this document

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
RR-0114	AWS	03-001, 03-006, 03-007, 04-024, 04-029, 04-030, 04-031, 04-032, 04-034, 04-036, 04-037, 04-038, 04-039, 04-040, 04-041, 04-042, 04-043, 04-045, 06-008, 06-009, 06-010, 06-012, 06-014, 09-013, 09-015, 09-018, 09-020, 09-021, 09-022, 09-023, 09-024, 09-025, 10-002, 10-005, 10-010, 10-011, 10-012, 10-014, 10-015, 10-016, 10-019, 11-002, 11-005, 11-006, 11-009, 11-010, 11-012, 11-014, 11-016, 11-017, 12-003, 12-004, 12-005, 12-006, 12-008, 12-009, 12-010, 12-011, 13-001, 13-001, 13-003, 13-006, 13-007, 13-008, 13-009, 13-014, 13-016, 13-023, 13-025, 13-026, 13-027, 14-001, 14-002, 14-003, 14-004, 14-005, 14-006, 14-007, 15-022, 15-025, 15-027, 15-028, 15-029, 15-031, 15-032, 15-033, 15-034, 16-	Anglian Water Services

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
		004, 16-007, 16-011, 16-013, 16-014, 16-017, 16-022, 16-023, 16-024, 16-026, 17-003, 17-004, 17-005, 17-007, 17-008, 17-009, 17-011, 17-012, 17-016, 17-017, 17-024, 17-031, 17-033, 17-038, 17-039, 17-041, 17-042, 17-042, 18-008, 18-010, 18-010, 18-014, 18-015, 18-026, 19-017	
RR-0587	EA	02-014, 02-016, 09-013, 09-015, 09-020	Environment Agency
RR-0664	GAAC	Not included in the Book of Reference	General Aviation Awareness Council
RR-0769	HE	N/A	Historic England
RR-1407	NGT	02-003, 02-005, 02-006, 02-009, 02-009, 02-011, 02-011, 02-015, 02-047, 07-018, 07-020, 07-020, 07-023, 08-003, 08-006, 08-006, 08-007, 08-007, 09-010, 09-012, 09-013, 09-014, 09-015, 09-018, 09-019, 09-020, 09-020, 09-023, 09-023, 09-024, 09-024, 11-011, 11-017, 13-007, 13-007, 13-007, 13-007, 13-008, 13-008, 13-008, 13-008, 13-009, 13-009, 13-010, 13-011, 13-012, 13-014, 13-014, 13-014, 13-014, 13-015, 13-016, 13-016, 13-017, 13-017, 13-018, 13-	National Gas Transmission Plc

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
		018, 13-026, 14-009, 14-009, 15-009, 16-018, 16-019, 16-020, 16-023	
RR-1408	NGET	17-013, 17-015, 17-020, 17-029, 17-040, 18-003, 18-006, 18-009, 19-001, 19-002, 19-003, 19-009, 19-010, 19-011, 19-012, 19-013, 19-014	National Grid Electricity Transmission Plc
RR-1409	NH	N/A	National Highways
RR-1410	NE	N/A	Natural England
RR-1452	NGC	N/A	Norfolk Gliding Club
RR-1453	NWT	N/A	Norfolk Wildlife Trust

2 The Applicant's Response to Statutory Bodies, Undertakers and Notables with whom the Applicant is seeking a Statement of Common Ground

2.1 Anglian Water Services

Table 2.1 Applicant's Response to Anglian Water Services ([RR-0114](#))

ID	Theme	Representation	Applicant's Response
AGW-001	Scheme	AWS supports the delivery and operation of nationally significant infrastructure projects (NSIPs) carried out in line with the Water Industry Act 1991. It collaborates with developers, including those delivering schemes under the Planning Act 2008, to ensure that any required alterations to sewers, wastewater systems, and water supply infrastructure are carefully planned and implemented with minimal disruption to both the project and customers. AWS must ensure the location and nature of our assets serving local communities and strategic water supply infrastructure are identified and protected. This includes minimising potential impacts on our assets and avoiding the need	The Applicant makes note of this comment and welcomes further engagement with AWS. Protective provisions are included at Part 6 of Schedule 14 of the Draft DCO [AS-032] for the protection of AWS to ensure its assets are suitably protected. The Applicant will remain engaged to seek to agree those provisions.

ID	Theme	Representation	Applicant's Response
		for diversions as far as possible. It is important that these are identified and planned for appropriately within the Order Limits of the DCO.	
AGW-002	Consultation and Engagement	AWS has engaged with East Pye Solar Ltd (the Applicant) throughout the pre-application period including written comments to the Scoping Consultation, formal statutory consultation, and Targeted Consultation, on the proposed Development Consent Order (DCO) application and the Preliminary Environmental Information Report (PEIR). In addition, AWS has also met with the Applicant to discuss matters raised in the consultation including sending our Bespoke Protective Provisions (BPP) for inclusion in the Draft DCO.	The Applicant makes note of this comment and welcomes further engagement with AWS.
AGW-003	Protective Provisions	A copy of AWS's Bespoke Protective Provisions (BPP's) was supplied to the Project Team and their legal representatives through the pre-application period to ensure that the necessary protections and measures are undertaken in discussion with AWS when the Project moves forward to delivery. AWS welcome their inclusion in the dDCO 'Schedule 14, Article 45, Protective Provisions, Part 6 For the Protection of AWS	The Applicant notes this comment and will make the amendment proposed to the BPPs.

ID	Theme	Representation	Applicant's Response
		Services Limited. (APP-017). This has been reviewed by our legal team, and we raise no points of concern regarding additions/ changes made to these provisions. AWS would add as a minor alteration required to the BPP's under 'Interpretation' and after '63' In this Part of this Schedule' to reinstate the wording "1991 Act" means the New Roads and Street Works Act 1991.	
AGW-004	Statement of Common Ground	It is noted in APP-211- Potential main issues for examination, summarises the main residual issues with key stakeholders remaining at the time of the DCO Application's submission. Several key stakeholders, which will inform future Statements of Common Ground (SoCG), have been named. It is disappointing that AWS are not included, however, the Applicant has recently contacted us in respect of preparing a draft SoCG and we have confirmed the submission of an agreed SOCG would be beneficial. If no connections or interfaces with our assets are identified or specific arrangements are needed to be put in place, then it would be helpful to log this in an SOCG making the examination process more efficient.	The Applicant confirms it has initiated engagement with AWS to prepare a draft Statement of Common Ground and welcomes the confirmation that this would be beneficial. The Applicant will continue to engage constructively with AWS throughout the Examination to record areas of agreement and any outstanding matters. The Applicant draws attention to the fact that AWS has been expressly identified within Section 7 of the Planning Statement [APP-209] as a party with which the Applicant expects the Examining Authority to request a SoCG.

ID	Theme	Representation	Applicant's Response
AGW-005	Book of Reference	AWS has reviewed the Book of Reference (APP-022) and the associated documents and identified, within land plans 09-013 and 09-15, the ownership reference currently attributed is incorrect. These references should be removed, as AWS neither owns nor claims ownership of this land. The documents will therefore need to be updated to accurately reflect the correct position for these plots. For further LiQ enquiries relating to AWS's above ground assets and formal easements, the Applicant should contact our estates team on: awsestates@savills.com	The Applicant confirms that comprehensive land referencing due diligence has been undertaken across the Project as set out in Section 7 of the Statement of Reasons [APP-020]. In cases where ownership or interests for unregistered land could not be conclusively established, the Applicant has adopted a precautionary approach by including adjacent landowners. This ensures that all potential interests are appropriately captured and notified. The Applicant acknowledges Anglian Water Services Limited's confirmation that it does not own, and does not claim ownership of the land plots 09-013 and 09-015 in the Land Plan [APP-006], page 11 (sheet 9). In light of this clarification, the Applicant will review the relevant entries and update the Book of Reference [APP-022], where appropriate, in the next revision submitted during the Examination.
AGW-006	Interface between Scheme and AWS Assets	AWS owns and operates the water supply and sewerage infrastructure within the Project Order Limits. There are significant existing AWS assets with numerous buried mains water pipes, sewers etc. located within/ adjacent to the public highway which serve the local villages including: Tasburgh, Hempnall, Hempnall Green, Silver Green,	The Applicant notes Anglian Water Services' comments regarding existing water and sewerage assets. Measures are in place to protect AWS' assets – see the protective provisions at Part 6 of Schedule 14 of the DCO. The Applicant will continue to engage with AWS to minimise interaction with

ID	Theme	Representation	Applicant's Response
		Long Stratton, Kirstead Green, Saxlingham Green, Road Green Woodton and Hedenham. In locations where the Project intersects with these assets, measures will need to be in place to ensure their protection and operational continuity of water and sewerage services to customers, including BPPs referenced above. Maps of AW's assets are available to view at: http://www.digdat.co.uk The design of the Project should minimise interaction with AWS assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions. This may include the need for the panels to be positioned in such a way to avoid underground assets, as they may not be able to be diverted in all situations. Through previous consultation stages, AWS has identified some notable assets within or in the vicinity of the order limits. There are a number of existing underground assets, including supply pipelines which are in the Project's order limits. Water recycling assets including foul sewers are within the village areas. These points have been raised in our previous responses on the Project.	AWS assets and to coordinate detailed design in accordance with the Protective Provisions for AWS in the Draft DCO [AS-032]. Effects on utilities are assessed in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] and shown on ES Volume 2, Figure 18.1 - Utilities Plan [APP-110]. The Applicant is preparing a Statement of Common Ground with AWS for submission during the Examination.

ID	Theme	Representation	Applicant's Response
AGW-007	Interface between Scheme and AWS Assets	Chapter 2: The Scheme (APP-040), paragraph 4.3.14, states that the cable routes will need to cross a range of existing utility infrastructure. Table 4.1, Scheme Parameters Used for the ES, indicates that the maximum trench depth beneath existing buried utilities or apparatus will be 2m. However, this does not account for variations in the size or type of pipelines that may be present.	The Applicant makes note of this comment and welcomes further engagement with AWS. The Applicant notes AWS's comment on trench depth parameters set out in ES Volume 1, Chapter 4 – The Scheme [APP-039], Table 4.1, and the Design Principles, Parameters and Commitments [APP-213]. The Design Principles, Parameters and Commitments [APP-213] document will be updated at Deadline 1 to clarify that that a maximum trench depth of 2m is applicable to the cable depth where unconstrained by an obstacle; and that a 2m depth below existing apparatus is being committed to where the latter parameter reflects the maximum permitted trench depth below existing apparatus for EIA (Rochdale Envelope) purposes, and that detailed design of individual utility crossings will be undertaken having regard to the specific characteristics of the utility being crossed. The Outline CEMP [APP-196] confirms consultation and agreement of construction methods with utility providers prior to works commencing, and through the protective provisions for the benefit of AWS within Part 6 of Schedule 14 of the Draft DCO [AS-032].

ID	Theme	Representation	Applicant's Response
AGW-008	Interface between Scheme and AWS Assets	Where there are interfaces with our assets, we will require the BPPs for AWS to be included in the dDCO and would ask that the following indicative stand-off distances are applied (as indicated in our template supplied). (a) 4 metres where the diameter of the pipe is less than 250 millimetres. (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.	This is secured through the protective provisions for the benefit of AWS within Part 6 of Schedule 14 of the Draft DCO [AS-032]. See paragraph 70(7).
AGW-009	Interface between Scheme and AWS Assets	AWS has sought to engage with the Applicant to carry out a clash detection and technical assurance review of the Project to confirm, for example, any sensitive plant, open cut locations, access works, diversions any above ground plant and shared access locations. Given the substantial number of other AWS projects being delivered in this Asset Management Period AMP8 (2025-2030), there is a strong advantage to having upfront discussions with AWS in relation to our asset interfaces with the Project. This	The Applicant notes and commits to AWS's request for clash detection and technical assurance review. The Applicant will continue to engage with AWS regarding asset interfaces, including trenchless crossings, open cut locations, access works, potential diversions and shared access. Protective Provisions for AWS are included within the Draft DCO [AS-032]. Detailed design will be undertaken in accordance with the Design Principles, Parameters and Commitments [APP-213] and secured through

ID	Theme	Representation	Applicant's Response
		opportunity has not been taken up by the Project. We strongly recommend that this assessment be undertaken at the earliest opportunity. This ensures clarity, reduces risk, and supports the timely and efficient delivery of the Project. Any review of utilities plans used to inform detailed design prior to construction should be in accordance with the PPs for Anglian Water. Further discussion is required between AWS and the Applicant to confirm these aspects, for example, trenchless crossings and horizontal drilling, ducting, open cut locations, access works, likely diversions, any above ground plant, and shared access locations. These matters should be addressed in supporting documents and will need to be amended accordingly as these matters are agreed.	the relevant Requirements of Schedule 2 of the Draft DCO [AS-032].
AGW-010	Water Resources	The Project is within the Norfolk Norwich & the Broads Water Resource Zones (WRZ), and Norfolk Harleston WRZ. Our WRZ summaries explain that the baseline supply demand balance for these WRZs are expected to go into deficit by 2025 under Dry Year Annual Average conditions. The Environmental Statement – Non-Technical Summary (APP-194) recognises	The Applicant welcomes continued engagement with Anglian Water throughout the Examination process.

ID	Theme	Representation	Applicant's Response
		previous responses from AWS regarding water scarcity; paragraph 9.2.4 acknowledges that the Project sits within a 'seriously water stressed' area set out in the Environment Agency's 'Water stressed areas – final classification 2021 (July 2021)'. Paragraph 9.3.1 details the potential for environmental effects as a result of the project and therefore mitigation will be embedded that will contain the foul water; tanker in water supply and prioritise water neutrality; and the Battery Energy Storage System (BESS) would incorporate SuD's features and bunding to manage surface water runoff.	
AGW-011	Water Supply and Demand	Volume 3: Appendix 9.3 - Water Resources Assessment (APP-164), paragraph 2.1.6 states the current projected water demand for the Scheme for the three phases is as follows: • Construction phase – 31.13 m3/d (Potable 13.90 m3/d, non-potable 17.23 m3/d); • Operation and maintenance P=phase – 36.92 m3/d (Potable 7.78 m3/d, non-potable 29.14 m3/d); and	The Applicant acknowledges these comments and welcomes continued engagement with Anglian Water throughout the Examination process. As noted by Anglian Water, the Applicant has conducted a Water Resources Assessment (WRA) found within the ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164] , that has scoped out potable water supply and ground water and surface water abstraction options in response to previous concerns raised.

ID	Theme	Representation	Applicant's Response
		Decommissioning – 25.43 m³/d (Potable 12.05 m³/d, non-potable 13.38 m³/d); Volume 1: Chapter 9 - Water Environment (APP-045) paragraphs 9.8.6 and 9.8.7 consider the construction and decommission phases of the project will have the highest water demand, however APP-164 states operation and maintenance will have the highest water demand. This will need to be clarified. Notwithstanding this, the documents acknowledge the seriously water stressed status of the area. The availability of water resources was a previous concern raised by both AWS and the Environment Agency, particularly regarding impacts on groundwater from abstraction. AWS's response to the statutory consultation and PEIR raised the matter of water resources and the quantities of water that might be required through the construction and operation phases of the Project. AWS understands the Water Resources Assessment (WRA) has scoped out potable water supply and ground water and surface water	The Applicant confirms that the operation and maintenance phase will have the highest water demand.

ID	Theme	Representation	Applicant's Response
		abstraction options in response to previous concerns raised.	
AGW-012	Potable Supply Options	Volume 1: Chapter 4 - The Scheme (APP-040) Paragraph 4.4.55 to 56 estimate a use of 16,872.2 m3 of water would be required to meet construction demands, and tankering is considered to be the main option for potable water to include a storage option within the order limits. This is supported by Volume 3: Appendix 9.3 - Water Resources Assessment (APP-164), para 4.1.4. In terms of water supply for the decommissioning phase. AWS support this approach to water supply; however, it is not clear from the draft environmental statements where the supply of water required for decommissioning will be sourced. This will need to be addressed and agreed with AWS (if required from us). AWS supports the use of tankering in water supply, although it is probable the water will still be from AWS supply, for all phases of the Project and the use of storage facilities to reduce the number of visits to the sites. This supports AWS's current position on new unplanned nondomestic water requests which	As stated in the Outline CEMP [APP-196], water neutrality options have been given priority to reduce the supply requirements, and tankering is the preferred method. The Applicant welcomes that the Anglian Water is supportive of tankering as the preferred option to supply the Scheme. The Applicant also confirms that the water required for fire suppression and decommissioning of the site will also be acquired through tankering. It is acknowledged that the decommissioning phase will begin in 2091, when it is assumed that the current pressure on water supplies from climate change and abstraction licence reductions will remain. The Applicant notes AWS's current position on new unplanned non-domestic water requests and welcomes continued engagement with Anglian Water throughout the Examination process. The Applicant will also explore tankering options outside the AWS region to meet Scheme demand.

ID	Theme	Representation	Applicant's Response
		is to decline requests that exceed 20m ³ /day. Our non-domestic water requests position statement can be found here. Should the option for tankering change, we would encourage the Applicant to use our pre-planning enquiry service through our customer portal to ensure the Project's water supply requirements can be appropriately addressed, and whether network reinforcement is needed to provide any domestic water requirements at the substations, and fire-suppression water storage infrastructure for the BESS.	
AGW-013	Non-Potable Water Supply Options	Rainwater Harvesting is addressed within Volume 3: Appendix 9.3 - Water Resources Assessment (APP-164), paragraph 4.1.6 includes a rainwater harvesting system within the Scheme design to align with the management of surface water on Site. This chapter also suggests an option of a silt booster unit to treat the surface water (if required). This is supported by AWS.	The Applicant welcomes that the Anglian Water is supportive of Rainwater harvesting. The Applicant expects to align the on-site SUDs design and the water resources assessment to develop an effective rainwater harvesting scheme meeting non-potable water demand and addressing on-site runoff / flooding.
AGW-014	Fire Water	Volume 1: Chapter 4 - The Scheme (APP-040) details a volume of stored fire water will be maintained on site to ensure there is sufficient water for firefighting purposes. Paragraph 4.5.20 states the volume of stored	As stated in the Outline CEMP [APP-196] , water neutrality options have been given priority to reduce the supply requirements, and tankering is the preferred method. The Applicant confirms that

ID	Theme	Representation	Applicant's Response
		fire water will be maintained to ensure there is sufficient water for firefighting purposes and in paragraph 4.3.2 of the Outline Battery Safety Management Plan (APP-200) it states the BESS area will contain a minimum of two firefighting water storage tanks of no less than 230,000 litres in capacity, capable of delivering 1,900 litres per minute for 4 hours. It is not clear from the draft environmental statements where the supply of fire water will be sourced. This will need to be addressed and agreed with AWS (if required from us).	the water required for fire suppression of the site will also be acquired through tankering. The Applicant notes AWS's current position on new unplanned non-domestic water requests and welcomes continued engagement with Anglian Water throughout the Examination process. The Applicant will also explore tankering options outside the AWS region to meet Scheme demand.
AGW-015	Wastewater	AWS understands Part 4 of the dDCO allows supplementary powers to discharge water into any watercourse, or public sewer or drain for the drainage of water with the consent of the person to whom it belongs. Earlier consultation documents did not explain how wastewater flows would be handled across the separate phases of the Project. However, Volume 1: Chapter 4 -The Scheme (APP-040) paragraph 4.4.57 clarifies that during construction, foul wastewater will be managed through self-contained portable welfare units, with all waste stored and periodically removed by a licensed specialist contractor.	The Applicant notes this comment.

ID	Theme	Representation	Applicant's Response
		For the operation and maintenance phase, paragraphs 4.5.18 and 4.5.19 confirm that similar self-contained portable welfare units will be used on an as-needed basis, with foul and wastewater collected and transported by licensed contractors to appropriate wastewater treatment facilities. Further detail is provided in Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy (APP-162), where section 9.14 confirms that wastewater from welfare facilities in all phases will be stored within sealed systems and removed by tanker. No connections to AWS sewers are proposed for wastewater disposal. AWS acknowledges there is no proposed direct discharge to its sewer network.	
AGW-016	Flood Risk Assessment (FRA)	The Flood Risk Assessment (FRA) and Outline Surface Water Management Plan (APP-162) should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to our networks.	Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] outlines that the notable impermeable areas within the Scheme will be the BESS, National Grid and Project Substations. The surface water drainage systems for these elements will be lined with an

ID	Theme	Representation	Applicant's Response
		The likelihood of more extreme weather events leading to higher than average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The Project should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure.	impermeable membrane for pollution risk management purposes / groundwater body protection. Surface water runoff from these areas will be discharged at QBAR for all events up to and including the 1 in 100 annual probability +45% allowance for climate change rainfall event, providing a betterment in the higher order events. The detailed design is secured by DCO Requirement. The majority of the Scheme consists of solar panels. Surface water runoff from the panels will drip onto the grass cover beneath and percolate to ground as per the existing regime.
AGW-017	Flood Risk Assessment (FRA)	AWS welcomes section 5.5 Sewer flooding within Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy (APP-162), and recognition of the following public sewers within the order limits: • A 150mm diameter foul sewer and rising main are located beneath The Green (Saxlingham Green) within the boundary of Sub-Site 7D; • A foul rising main runs through CRC7 to the Hempnall Fritton Road Water Recycling Centre (WRC);	The Applicant is pleased that AWS welcomes the inclusion of sewer flooding within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] .

ID	Theme	Representation	Applicant's Response
		• A 150mm diameter foul sewer runs beneath The Street (Woodton) approximately 400m from the boundary of Sub-Site 10A; • A 150mm diameter foul sewer runs beneath Fairstead Lane (Tasburgh) within the boundary of Sub-Site 7A and a foul pumping station is located near the boundary; and • A 150mm diameter foul sewer and rising main beneath High Green (Brooke) and a pumping station located approximately 60m north of Site 9.	
AGW-018	Flood Risk Assessment (FRA)	Flooding from other sources should include reference to AWS infrastructure and further detail provided regarding potential temporary effects on flood risk from third party infrastructure works during construction of the Project should be provided in the FRA, given the interfaces between the Project and AWS assets. These interfaces will also be managed through the BPPs and agreed construction practices. Notwithstanding the lead roles of the Lead Local Flood Authority, the Environment Agency and the Internal Drainage Boards,	The Applicant notes this comment on the effects on flood risk from the Scheme's construction phases on local drainage/sewerage networks. Construction compounds and internal haul routes will incorporate appropriate surface water and pollution management measures as contained within and secured by the Outline CEMP [APP-196] to ensure that flood risk is not increased within the Order Limits or elsewhere. The commitment to providing the measures above is also contained within and secured by the Design Principles, Parameters and Commitments

ID	Theme	Representation	Applicant's Response
		AWS would welcome clarification on how resultant impacts on the local drainage/ sewerage network will be designed as part of the detailed scheme.	[APP-213] which is secured through Requirement 5 of the DCO.
AGW-019	Draft DCO Schedule	AWS welcome the inclusion of AWS as a consultee within the dDCO Schedule 2 - Requirements - Surface and Foul Water Drainage (Paragraph 11) (APP-017), so we are consulted on details of the surface water drainage scheme and any foul water drainage system. This is particularly important as the Surface Water Drainage Strategy will include the BESS and run-off/containment measures.	The Applicant notes this comment.
AGW-020	Surface Water and Foul Water Drainage	AWS understands that the surface water drainage arrangements are indicative at this stage and will be subject to further refinement in accordance with drainage principles secured through the Design Principles, Parameters and Commitments chapter and the Outline Operational Environmental Management Plan (OEMP) Volume 3: Appendix 9.1 (APP-197), Paragraph 9.1.2. It is noted that surface water drainage will be addressed in greater detail within specific environmental management plans.	The Applicant notes this comment and is pleased that AWS supports the proposed approach to surface water and foul drainage.

ID	Theme	Representation	Applicant's Response
		Volume 1: Chapter 4 - The Scheme (APP-040), Paragraphs 4.5.21 and 4.5.22 confirm the operational drainage design will be prepared pre-construction, with the objective of maintaining existing land drainage levels. The design of new drainage systems will be based on the Design Principles, Parameters and Commitments (APP-213) and informed by the hydrological assessment undertaken as part of the Environmental Statement.	
AGW-021	Outline Battery Safety Management Plan	The Outline Battery Safety Management Plan (APP-200) Paragraph 4.3.2 states that the BESS firefighting scheme will include an external water capture and drainage system, with automatically actuated valves to isolate site drainage in the event of a fire. Any retained water will be sampled and analysed before discharge; contaminated water will be tankered off-site for treatment, while uncontaminated water may be discharged in a controlled manner subject to regulatory approval. During operation, panel cleaning will use deionised water delivered by tanker, with no chemical cleaning products used;	The applicant notes this comment.

ID	Theme	Representation	Applicant's Response
		instead, stubborn dirt will be removed manually.	
AGW-022	Surface Water and Foul Water Drainage	AWS supports the proposed approach to surface water and foul water drainage and will review the details further upon formal consultation at the discharge of relevant requirements.	The Applicant is pleased that AWS supports the proposed approach to surface water and foul drainage.
AGW-023	Outline Management Plan Documents	AWS notes the submission of these framework documents construction/ operation/ decommissioning environmental management plans; and construction traffic management plan. AWS would welcome specific reference on how the interfaces with utility assets such as for sewers and water supply within the Order Limits will be managed through the construction of haul roads and bellmouths. Whilst Protective Provisions should address those interfaces with our assets, AWS would welcome further discussion with the Applicant regarding such matters through the SoCG. These documents should include steps to remove the risk of damage to AWS assets from plant and machinery (compaction and vibration during the construction phase), including any haul and access roads and crossings	The Applicant will continue to engage with AWS on interfaces with its assets, in accordance with the Protective Provisions for AWS in the Draft DCO [AS-032]. In addition to the commitments in the protective provisions, Table 3.15 of the Outline CEMP [APP-196] contains measures relating to construction works in proximity to utilities including a commitment to liaise with utility providers prior to commencing construction regarding construction timelines, activities, proximity to assets and construction management measures. This would include discussions regarding the construction of haul roads and bell mouths and the use of plant and machinery. Detailed CEMP, OEMP, DEMP and CTMP will be substantially in accordance with the Outline CEMP [APP-196], the Outline OEMP [APP-197], the Outline DEMP [APP-198] and the Outline CTMP

ID	Theme	Representation	Applicant's Response
			[APP-201], secured through Requirements 13, 14, 21 and 15 of the Draft Development Consent Order [AS-032]. The Applicant welcomes further engagement with Anglian Water through the Statement of Common Ground process.
AGW-024	Outline Management Plan Documents	AWS would seek to ensure that 24 hours/ 7-day access to our assets is not compromised and, therefore, would welcome further discussion with the Applicant regarding such matters and their inclusion in the finalised documents. AWS reserves its position on the need to be included as a consultee to these detailed management plans, under the discharge of requirements relating to these under Schedule 2 –Requirements. Specifically, requirements within the DCO Order (6) Battery safety management plan in terms of water and wastewater, (13) Construction environmental management plan; (14) Operational environmental management plan; (15) Construction traffic management plan; (16) Operational traffic management plan and (21) Decommissioning and restoration.	The Applicant welcomes further engagement with Anglian Water through the Statement of Common Ground process.

ID	Theme	Representation	Applicant's Response
AGW-025	Source Protection Zones	The applicant acknowledges that parts of the Proposed Development are located within Drinking Water Protection Zones and has set out measures to address potential risks to groundwater. In particular, it is proposed that drainage systems associated with the BESS, National Grid Substation, and Project Substation will incorporate impermeable membranes to prevent any interaction between surface water runoff and the underlying strata as detailed in Volume 3: Appendix 9.1 (APP-197) Sections 9.9 and 9.10. In addition, the BESS facility will include further mitigation measures to manage the risk of contamination in the event of a fire. The Outline Surface Water Drainage Strategy also confirms that surface water management measures will be designed to reflect the specific characteristics of each element of the Scheme, including their footprint and permeability. These considerations will inform the detailed drainage design, which will be secured through a DCO Requirement. In relation to groundwater sensitivity, it is noted that the northern part of the Order Limits falls within Source Protection Zone (SPZ) 3, indicating a medium level of receptor	Flooding from other sources should include reference to AWS infrastructure and further detail provided regarding potential temporary effects on flood risk from third party infrastructure works during construction of the Project should be provided in the FRA, given the interfaces between the Project and AWS assets.

ID	Theme	Representation	Applicant's Response
		sensitivity, while the remainder of the Site lies outside any SPZ. Whilst this reduces overall risk compared to development in closer proximity to abstraction boreholes, there remains some uncertainty regarding the potential for the solar PV development to affect subsurface water. Accordingly, it is important that the Project adopts appropriately designed systems to minimise any risk of contamination, including the avoidance of PFAS-containing coatings where possible.	

2.2 Environment Agency

Table 2.2 Applicant's Response to Environment Agency [[RR-0587](#)]

ID	Theme	Representation			Applicant's Response
EA-001	Outline Construction Environmental Management Plan	EA1 Preliminary works not covered by Construction Environment Management Plan Document Reference(s) APP-017 Draft Development Consent Order Part 1 (2) Interpretation	Issue:	The definition of the words “commence” and “permitted preliminary works” means that certain activities that may cause environmental harm – (specifically (d) remedial work in respect of any contamination or other adverse ground conditions.) are not covered by the outline Construction Environmental Management Plan.	Requirement 13(1) already secures that all of the permitted preliminary works (including sub-paragraph (d)) must be carried out in accordance with the permitted preliminary works environmental management plan. It is therefore not necessary to amend the DCO for such works to be controlled by the CEMP because this would duplicate the condition which is already secured.
			Impact:	The mitigation commitments secured via the oCEMP will not be applied to this activity, creating a risk of pollution to the water environment.	
			Solution	Amend DCO wording to ensure that remediation of contamination or other	

ID	Theme	Representation			Applicant's Response
				adverse ground conditions would be required to be in accordance with the approved detailed CEMP, or else subject to equivalent environmental mitigation.	
EA-002	Water Environment	EA2 Disapplication of Flood Risk Activity Permits Document Reference(s): APP-017 Draft Development Consent Order Part 2 (6)e Disapplication	Issue:	The applicant wishes to disapply Flood Risk Activity Permits however no request has been made to the EA to do so.	The Applicant has had an initial meeting with the Environment Agency (EA) regarding the proposed disapplication of Flood Risk Activity Permits. The purpose of that meeting was for the Applicant to better understand the information being requested by the EA. Consultation with the EA on the proposed disapplication is ongoing and the Applicant will provide details of any relevant structures and a basic method statement to support the EA consideration.
			Impact:	Risks to the water environment may not be adequately managed.	
			Solution:	Provide details to include the nature, location and the associated environmental risks of the activities for which disapplication is sought. We will then be able to advise the planning inspectorate if it is appropriate to disapply.	
EA-003	Draft DCO	EA3 Environment Agency as a named	Issue:	The Environment Agency is currently not included as a	

ID	Theme	Representation			Applicant's Response
		consultee for requirements Document Reference(s): APP-017 Draft Development Consent Order Schedule 2 - Requirements		named consultee in Schedule 2 for: Requirement 6 – Battery Safety management plan Requirement 13 - Construction environmental management plan; Requirement 14 - Operation environmental management plan.	The EA has been included as a named consultee in Requirements 6, 13 and 14 in the Draft DCO [AS-032] .
			Impact:	If the Environment Agency is not named on the relevant requirements, then we may not be able to secure the required details post-consent.	
			Solution:	We request to be named as consultee for Requirements 6, 13 and 14.	
EA-004	Draft DCO	EA4 Use of phrase 'Substantially in accordance with'	Issue:	The use of the phrase 'Substantially in accordance with' in requirements undermines enforceability and creates unnecessary uncertainty.	The Applicant's wording that the final plans must be "substantially in accordance with" the outline plans is well established, standard drafting across made DCOs. It provides essential flexibility between the outline stage and

ID	Theme	Representation			Applicant's Response
		Document Reference(s): APP-017 Draft Development Consent Order Schedule 2 - Requirements	Impact:	Requirements cannot be enforced appropriately and topic details which have previously been agreed and information that the EA has based its position on can be undermined.	detailed design. At the point of submission and Examination, outline management plans are necessarily prepared on the basis of indicative design and assumptions. As the project progresses to detailed design, new or refined information may become available, or circumstances may change, requiring reasonable and sensible amendments to the measures proposed – for example, the construction methods and design may evolve. Without this wording, any minor or beneficial deviations from the outline plan could result in a breach of a Requirement, exposing the undertaker to potential criminal liability. The wording therefore strikes a necessary and deliberate balance by securing the principles, objectives, and mitigation measures set out in the outline documents, thereby providing certainty and comfort to stakeholders and regulators; while allowing flexibility to adjust detail where this is necessary, proportionate, or environmentally
			Solution:	Remove the word substantially from all requirements.	

ID	Theme	Representation			Applicant's Response
					preferable at the detailed design stage. For example, it is not the intention that the Applicant is bound rigidly to all exact timings and durations of works set out in the outline plans because there is a need for flexibility. If the wording was amended to be less flexible, the practical effect would be counterproductive because the outline documents would need to be drafted at a much higher and less informative level to avoid unintentional non-compliance. This would reduce, rather than enhance, certainty for stakeholders during examination. It would undermine the ability to respond positively to new information or improved mitigation techniques at detailed design stage.
EA-005	Protected Provisions	EA5 Protective Provisions	Issue:	The EA Protective Provisions which have been included in the DCO are not standard and for a FRAP which we haven't agreed to disapply.	The Applicant will seek to agree protective provisions with the EA, with the agreed provisions to be incorporated into the Draft DCO [AS-032] . Discussions in relation to the protective provisions and the disapplication of FRAPs is ongoing.
			Impact:	Non standard wording of protective provisions	
		Document Reference(s): APP-017 Draft Development Consent Order			

ID	Theme	Representation			Applicant's Response
		Schedule 14 – Protective Provisions Part 7 pg144		creates legal uncertainty and risk to enforcement, with the potential for risk to the Environment.	
			Solution:	If disapplication is approved replace protective provision with EA standard approved protective provisions.	
EA-006	Draft DCO	EA6 Discharge of requirements Document Reference(s): APP-017 Draft Development Consent Order Schedule 15 – Procedure for discharge of requirements 3. (3) Further information and consultation	Issue:	LPA must notify the undertaker within 15 working days of receipt of consultation, if further information is requested by a named consultee. Therefore, the named consultee has 10 working days to review the consultation & determine if sufficient information has been provided. The Environment Agency has been given insufficient time to review and respond to the discharge of requirements.	The Applicant has updated paragraph 3 of Schedule 15 of the Draft DCO [AS-032] to allow for consultee feedback within 20 working days of the LPA's receipt of the application. This will be captured in the next iteration of the Draft DCO [AS-032] to be submitted at Deadline 1. On the basis that the relevant planning authority must issue the consultation to the requirement consultee within 5 working days of receipt of the application, this ensures that the requirement consultees (including the EA) will have at least 15 working days to review the consultation

ID	Theme	Representation			Applicant's Response
			Impact:	Not having sufficient time will undermine the consultation process and the protection of the environment	& determine if sufficient information has been provided.
			Solution:	Amend to 15 working days to review the consultation & determine if sufficient information has been provided.	
EA-007	Water Environment	EA7: Flood Risk - Impact of panels on floodplain storage Document Reference(s): APP-162 Environmental Statement Vol 3: Appendix 9.1 – Flood Risk Assessment Paragraph 8.1.4	Issue:	Figure 5.4 suggests all solar panel development will be located outside of flood zones 2 and 3. However, paragraph 8.1.4 indicates panels may be affected by the design flood extent (i.e when an allowance for climate change is included).	This comment relates to the Solar PV Arrays located in the north-western area of Sub-Site 8A. ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] paragraph 8.1.4 provides analysis against maximum flood levels for Sub-Site 8A (Node 6), however these flood levels do not directly correspond to the area where Solar PV Arrays are set on a ground level of 29.00m AOD. Comparing the 1 in 1000 AP +25%cc flood of 28.85m AOD for Node 2 with the minimum ground level of 29.00m AOD
			Impact:	Potential loss of floodplain storage caused by solar panels located within the design flood extent.	
			Solution:	The FRA should confirm where, and to what extent,	

ID	Theme	Representation			Applicant's Response
				panels are proposed within the 1 in 100 yr plus climate change design flood extent. A volumetric assessment of panel supports within the flood extent should then be provided to assess the potential impact on floodplain storage.	confirms that Solar PV Arrays within the north-western area of Sub-Site 8A (set on a ground level of 29.00m AOD) are set at least 150mm above all modelled floodplains up to and including the 1 in 1,000 AP +25% floodplain. The panel supports in this area of Sub-Site 8A would therefore not impact on fluvial floodplain storage.
EA-008	Water Environment	EA8 Flood risk implications of temporary works Document Reference: APP-196 Outline Construction Environment Management Plan Paragraph 2.12.2	Issue:	Avoidance Areas are proposed at proposed watercourse crossings. However further detail is required on the location and design of works crossing Main River watercourses.	The Applicant takes note of this comment. The Design Principles, Parameters and Commitments [APP-213] states that for any trenchless crossings, both the launch and reception pits will be a minimum distance of 10m from main rivers, watercourse or ditch (including IDB drains). The minimum cable depth will be 5m below the surveyed bed of main rivers. The Applicant confirms that crossings of main rivers will be undertaken by trenchless techniques. The location of the Avoidance Areas are shown in the
			Impact:	There is potential for temporary works to increase flood risk where works are located within the floodplain and / or affect the Main River channel, bed, or banks.	
			Solution:	The extent of Avoidance Areas should be confirmed	

ID	Theme	Representation		Applicant's Response
			in terms of meters set back from watercourses. Confirmation should be also provided that Main River watercourse crossings will be undertaken by trenchless techniques i.e. HDD, and that locations of launch and reception pit are set back in accordance with guidance set out within The Environmental Permitting (England and Wales) Regulations 2016.	Outline Cable Route Construction Statement [APP-216] and secured through the Outline CEMP [APP-196]. The Applicant is in discussions with the EA in respect of the disapplication of the Environmental Permitting (England and Wales) Regulations 2016 in respect of flood risk activity permits. The Applicant has included protective provisions for the benefit of the EA to give comfort in this regard.
		Additional comments:	The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: • On or within 8 metres of a main river (16 metres if tidal) • On or within 8 metres of a flood defence structure or culvert (16 metres if tidal)	

ID	Theme	Representation			Applicant's Response
			- On or within 16 metres of a sea defence - Involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert - In a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission. For further guidance please visit https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits		
EA-009	Water Environment	EA9 Potential use of culverts Document Reference: APP-162 Environmental Statement Vol 3: Appendix 9.1 –	Issue:	The FRA notes the potential use of culverts at watercourse crossings.	ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] Section 8.3 paragraph 8.3.3 sets out a hierarchy for the nature of watercourse crossings, with highest preference given to crossings which do not interfere with the banks or bed of watercourses, with
			Impact:	Installation of new culverts has the potential to increase flood risk to both the development and offsite receptors.	

ID	Theme	Representation			Applicant's Response
		Flood Risk Assessment Paragraph 8.3.4	Solution:	We would encourage the use of a clear-span bridges in preference to new culverts. This is in line with the Environment Agency's anticulverting policy.	closed culverts being the least preferred option. This is secured in the Design Principles, Parameters and Commitments [APP-213] and the Outline CEMP [APP-196]
		Additional comments:	Culverting existing watercourses/drainage ditches should be avoided. Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period [paragraph 3.10.78 and 3.10.79 of NPS EN3].		The use of closed culverts will be avoided as much as possible, however, they may be required for a limited number of crossing points. Any culverts will be appropriately designed with consideration of whether they will be temporary or permanent as set out in ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] Section 8.3.
EA-010	Water Environment	Water Quality EA10 WQ Guidance Document Reference: APP-045 ES Vol 1: Chapter 9	Issue:	Chapter 9 is missing relevant guidance.	The guidance set out in ES Volume 1, Chapter 9 – Water Environment [APP-045] Section 9.3 provides an overview of guidance relevant to the Scheme but is not an exhaustive list.
			Impact:	Risk that best practice may not be followed resulting in avoidable environmental harm.	

ID	Theme	Representation		Applicant's Response
		– Water Environment, section 9.3.7	Solution: - Guidance in relation to water environment and mitigation measures that could be included is: - Oil storage regulations for businesses - GOV.UK - Pollution prevention for businesses - GOV.UK - CIRIA C736, titled "Containment Systems for the Prevention of Pollution" - Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK	Works requiring oil storage and pollution prevention would adhere to all relevant guidance, as secured through the Outline CEMP [APP-196] including those additionally listed by the EA. The WFD Regulations Guidance referenced within ES Volume 3: Appendix 9.2 - Water Framework Directive Assessment [APP-163] is referred to within the NSIP: Advice on WFD guidance. Therefore, the assessment within ES Volume 3: Appendix 9.2 - Water Framework Directive Assessment [APP-163] adheres to the NSIP WFD guidance.
EA-011	Water Environment	EA11 Baseline data	Issue: Section 9.5.2 of Chapter 9 and 3.1.2 of WFD Assessment, which explains sources of data	The Water Quality Explorer will be reviewed, and any relevant information will be integrated into an updated version of the Water Framework Directive

ID	Theme	Representation			Applicant's Response
		Document References: APP-045 ES Vol 1: Chapter 9 – Water Environment, section 9.5.2 and 9.6.8 APP-163 6.3.9.2 ES Volume 3: Appendix 9.2 - Water Framework Directive Assessment, 3.1.2		collection, does not include the Water Quality Explorer.	Assessment [APP-163] at a future deadline.
			Impact:	If all available data isn't used, then valuable data may be missing from the baseline assessment.	
			Solution:	The Applicant should use Map Explorer Water Quality Explore for water quality measurements taken in the vicinity to use for baseline data.	
EA-012	Water Environment	EA12 Watercourse buffers Document References: APP-045 ES Vol 1: Chapter 9 – Water Environment, section 9.7.3 APP-162 ES Vol 3: Appendix 9.1 – Flood Risk Assessment & Outline Surface	Issue:	Section 9.7.3 says storage “away from main rivers and watercourses” but a specific distance is not provided.	The Applicant notes this comment and the secured documents will be updated at Deadline 1 to clarify that the 10m is measured from the top of the bank of the watercourse.
			Impact:	Inadequate buffers alongside watercourses increases the risk of activities on site having an impact on water quality	
			Solution:	Documents should consistently specify that storage of materials and temporary construction	

ID	Theme	Representation			Applicant's Response
		Water Drainage Strategy, section 8.2.1 APP-196 Outline Construction Environmental Management Plan, Tables 3.4 and 4.4 APP-198 Outline Decommissioning Environmental Management Plan, Tables 3.4 and 4.4		compounds/laydown areas should be at least 10m away from top of bank of watercourses, and, where practicable, away from areas of high groundwater vulnerability.	
		Additional comments:	We do note that 9.7.8 of Chapter 9; Outline Surface Water Drainage Strategy, Tables 3.4 and 4.4 of OCEMP, and Tables 3.4 and 4.4 of ODEMP states 10m, however it should be clear that this is measured from top of bank.		
EA-013	Water Environment	EA13 Management of foul water Document References: APP-040 ES Vol 1: Chapter 4 – The	Issue:	During construction and operation phases self-contained portable welfare units will be used to store foul/wastewater for collection/emptying by specialist licenced contractors. However, it is	The proposed wastewater management measures will be self-contained and sealed which will not allow the discharge of wastewater to surface water bodies or groundwater. Wastewater will be removed off-site by tanker to local licensed wastewater treatment works.

ID	Theme	Representation		Applicant's Response
		Scheme sections 4.4.37, 4.4.57, 4.5.18, 4.5.19; APP-045 ES Vol 1: Chapter 9 – Water Environment section 9.7.9; APP-162 ES Vol 3: Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy section 9.12.4 and 9.14.1; APP-196 Outline Construction Environmental Management Plan Table 3.4; APP-197 Outline Operational Environmental Management Plan,	unclear what is proposed for decommissioning. The units are described as 'self-contained' but it is unclear if this means they are fully sealed with no potential for discharge to the environment. Impact: Inadequate foul water treatment and disposal creates a risk to the water environment and deteriorating water quality. Solution: Provide clarity that the portable units are sealed and will have no discharge to surface water or groundwater. Provide clarity regarding foul water disposal strategy during decommissioning.	This is secured within the Outline OEMP [APP-197]. The proposal for decommissioning is secured within the Outline DEMP [APP-198], which contains the following measure relating to the containment of foul water within Table 4.4 and Table 5.4, <i>'Foul water from welfare facilities would be contained within sealed systems and tankered away'</i>. The Applicant notes that tankering movements are considered to be inherent within the trip generation and distribution forecasts as detailed and assessed within ES Volume 1, Chapter 11: Transport and Access [APP-047]. Tankering movements are therefore subject to the management and mitigation measures detailed within the Outline CTMP [APP-201] and Outline OTMP [APP-202] to be secured by Requirement of the Draft DCO [AS-032].

ID	Theme	Representation		Applicant's Response
		section 2.13.1 and Table 3.4; APP-198 Outline Decommissioning Environmental Management Plan Table 4.4; and APP-216 Outline Cable Route Construction Statement, section 2.7.3		
		Additional comments:	We note that section 9.7.9 of Chapter 9 and 9.12.4 from Drainage Strategy says "Foul water from welfare facilities during the construction and decommissioning phases will be contained within sealed systems and tankered from the Order Limits", but this should be consistent across documents. Information on septic tank permits can be found at: Septic tanks and sewage treatment plants: what you need to do: Apply for a permit - GOV.UK	

ID	Theme	Representation		Applicant's Response
			If road transport to an offsite disposal facility is required to remove foul water from the forementioned "self-contained" units, then there should be regard for this within the waste management procedures.	
EA-014	Water Environment	EA14 Water quality monitoring Document References: APP-196 Outline Construction Environmental Management Plan, Tables 3.4 and 4.4; APP-197 7.2 Outline Operational Environmental Management Plan, Table 3.4	Issue:	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. The ground investigation will include the collection of a baseline surface water quality dataset with laboratory analysis to be undertaken by a UKAS accredited laboratory and using MCERTS approved methods where available. The description of the ground investigation within the Outline CEMP [APP-196] will be updated to include this requirement for Deadline 1. The detailed specification of specific surface water locations would be a post-consent matter, informed by the progression of the detailed design of the Scheme.
			Impact:	
			Solution:	

ID	Theme	Representation			Applicant's Response
				details regarding water quality monitoring to include frequency and duration. Applicant should confirm there will be in-situ measurements using MCERTS approved methods and water samples to be sent to a UKAS accredited laboratory.	The Outline CEMP [APP-196] secures the following monitoring requirements within Table 3.4, 'A <i>Water Management Plan (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. This will be based on a combination of visual observations and reviews of the Environment Agency's automatic water quality monitoring network</i> '.
		Additional comments:	We note that a Water Management Plan will include details of pre-construction, construction, and post-construction water quality monitoring. Locations and specific parameters/methods can be agreed with the EA at detailed design. These locations should include monitoring upstream and downstream of any proposed surface water outfalls and water crossings.		During a meeting with the EA on the 19 th August 2026, it was agreed that the wording in the Outline CEMP [APP-196] to include a commitment to providing in-situ testing, with the detail to be finalised post consent in individual detailed management plans. The updated Outline CEMP [APP-196] will be submitted at Deadline 1.
EA-015	Water Environment	EA15 Concrete mitigation measures	Issue:	Concrete mitigation measures have not been detailed. Construction of concrete can be a risk to water quality as it is a	The Applicant acknowledges that more details will be required regarding the use of concrete. However, such detail is not available at this stage of the process.

ID	Theme	Representation			Applicant's Response
		Document Reference: APP-040 ES Volume 1: Chapter 4 – The Scheme Table 4.1		known source of hazardous substances, particularly during the curing phase	The detailed CEMP will provide greater detail regarding concrete mitigation including: - the location concrete works are proposed, - the nature of the concrete works taking place, - the methodology and mitigation proposed for in-situ concrete pours; and - Containment measures for concrete washout areas. This is secured through Requirement 13 (Construction environmental management plan) of the Draft DCO [AS-032] which requires the detailed CEMP to be submitted for the approval of the relevant planning authority, in consultation with the EA. This ensures that the final details will be suitably controlled.
		APP-196 Outline Construction Environmental Management Plan, Tables 3.4 and 4.4	Impact:	Risk of pollution to surface waters	
			Solution:	Provide further details on the use of concrete and how it will be managed.	
		Additional comments:	Further details should include: - Identify all areas where concrete works are proposed - Specify whether these will be cast in situ or precast and delivered. (We acknowledge that Table 3.4 CEMP says that concrete feet may be pre cast concrete.) - For in situ concrete pours, Applicant should suggest timing, weather conditions, and runoff control. Construction works should be minimised during heavy precipitation		

ID	Theme	Representation		Applicant's Response	
			events and carried out during dry months where practicable. Describe containment measures for concrete washout (e.g. lined washout pits, bunded areas)		
EA-016	Water Environment	EA16 Fuel, chemical & oil storage Document Reference(s): APP-040 ES Volume 1: Chapter 4 – The Scheme; section 4.4.54; APP-045 ES Volume 1: Chapter 9 – Water Environment section 9.7.3 and 9.7.9; APP-162 ES Volume 3: Appendix 9.1 – Flood Risk Assessment & Outline Surface	Issue:	Inadequate detail provided regarding the storage and management of fuel, chemicals and oils storage.	Table 3.15 (Materials and Waste) of the Outline CEMP [APP-196] states ' <i>All hazardous materials including fuels, chemicals, cleaning agents, solvents and solvent containing products to be properly sealed in containers in appropriately protected and bunded storage areas.</i> ' This is also repeated in section 4 of the Outline CEMP relating to the National Grid substation. This same comment applies to the Outline DEMP [APP-198] . Table 4.4 of the Outline OEMP [APP-197] states ' <i>Fuel and other potentially polluting chemicals will either be in self bunded leak proof containers or stored in a secure impermeable and bunded area</i>
			Impact:	Increased risk of fuel, chemicals and oils entering the water environment and impacting on water quality.	
			Solution:	Fuel, chemical and oil storage must be on impermeable surface, bunded and covered to prevent rainfall accumulation. If necessary, a method to remove accumulated rainwater should be provided. Hazardous materials should be stored at least 10m from watercourses. Oil	

ID	Theme	Representation		Applicant's Response
		Water Drainage Strategy and section 9.11.5 & 9.12.4; APP-196 Outline Construction Environmental Management Plan, Tables 3.4 and 4.4; APP-197 Outline Operational Environmental Management Plan, Table 4.4; APP-198 Outline Decommissioning Environmental Management Plan, Tables 3.4 and 4.4	separators could also be used in drainage systems. Substation drainage systems should be impermeably lined. Ensure mitigation measures used in construction phase are consistent with the decommissioning phase.	<i>(minimum capacity of 110% of the capacity of the containers), If pollution is detected it will be suctioned to a self-bunded (or similar) tank and removed from site for suitable disposal', in respect of the National Grid Substation.</i> The Applicant notes that this text is not included in Section 3 of the Outline OEMP [APP-197] relating to the rest of the Scheme and will update this document at Deadline 1. The Applicant notes that the Outline CEMP [APP-196] and Outline DEMP [APP-198] provide commitments to 10m buffers from watercourses. The Outline OEMP [APP-197] will be updated to include this commitment at Deadline 1. Further details will be provided within the detailed versions of these documents, in line with the 'Oil storage regulations for businesses' guidance, at the detailed design phase.
		Additional comments:	Fuel storage should comply with this guidance: Oil storage regulations for businesses - GOV.UK and Pollution prevention for businesses - GOV.UK We acknowledge that it says, "storage	

ID	Theme	Representation		Applicant's Response
			tanks would be sheltered", but this may not be enough to prevent rainfall accumulation.	
EA-017	Water Environment	EA17 Wheel cleaning Document Reference(s): APP-196 Outline Construction Environmental Management Plan, section 2.8.2 and Table 3.4; APP-198 Outline Decommissioning Environmental Management Plan, Table 3.4	Issue:	Lack of clarity regarding the management, containment and disposal of wheel wash water.
			Impact:	If contaminated wash water is not managed correctly, it can enter watercourses and impact on water quality.
			Solution:	Provide clarity that wheel washing activities will be undertaken within a designated impermeable or lined area. Wash water should be contained to prevent contaminated water entering waterbodies or groundwater. The frequency of maintenance of the wheel washing system should be specified. Provide clarity that, if discharge on-site is required, a water discharge
				The Applicant notes that clarity is required regarding the use of the wheel wash within the Outline CEMP [APP-196] and Outline DEMP [APP-198] . The Outline CEMP [APP-196] and Outline DEMP [APP-198] will be amended at Deadline 1 to provide further details surrounding the design and use of the wheel wash.

ID	Theme	Representation			Applicant's Response
				activity permit will be sought from the Environment Agency. Rumble strips and dry brushing could be used to remove mud from wheels to help minimise risk to water quality.	
		Additional comments:	We note that Table 3.4 of the ODEMP says “Equipment and plant to be washed and cleaned in temporary compounds, where runoff can be isolated for treatment before disposal”, but further information is needed.		
EA-018	Ground Conditions	EA18 Drilling Fluid breakout contingency	Issue:	Further detail is required in Table 3.4 regarding the proposed content of the drilling fluid breakout contingency procedure.	The Outline CEMP [APP-196] includes the following; <i>'In the event of surface seepage, contamination will be contained and cleaned up using sandbags and a vacuum tanker.'</i> <i>Any surplus drilling fluid will be recovered from entry/exit pits post installation by a specialist waste management company. This fluid will be collected and disposed of at a licensed facility</i>
		Document Reference(s) APP-196 Outline Construction Environmental Management Plan, section 2.8.2 and Table 3.4	Impact:	Risk of pollution to watercourses if drilling fluid break-outs are not managed correctly.	
			Solution:	The oCEMP should include monitoring for loss of drilling fluid during works to	

ID	Theme	Representation		Applicant's Response
			ensure any break-out is rapidly identified	<i>An Emergency Response Plan will include details for pollution prevention and will be prepared and included alongside the detailed CEMP. An Emergency Response Plan will be included alongside the detailed CEMP(s)' within Table 3.4. The Outline CEMP also states that 'where trenchless crossing technique is used such as HDD, a breakout contingency procedure will be included in the detailed CEMP(s) to manage any accidental releases of drilling fluid, including immediate containment and clean-up measures'. The Outline CEMP will be updated at Deadline 1 to confirm that the breakout contingency procedure will include monitoring for loss of drilling fluid during works to ensure any break-out is rapidly identified.</i>
EA-019	Decommissioning	EA19 Mitigation measures for Decommissioning Document Reference:	Issue: Inadequate detail in the oDEMP regarding mitigation measures for the water environment. Measures are indicated to be similar to those established in the oCEMP	It is acknowledged that the Outline DEMP [APP-196] provides lesser detail regarding proposed mitigation than the CEMP and OEMP. Paragraph 1.1.7 of the Outline DEMP [APP-198] contains the following text ' <i>This document provides the likely structure of, and some</i>

ID	Theme	Representation			Applicant's Response
		APP-198 Outline Decommissioning Environmental Management Plan Table 4.5		but some relevant measures identified in the oCEMP are not included.	<i>outline information relevant to, the detailed DEMP.</i> Paragraph 4.1.2 states ' <i>All mitigation will need to be reviewed and updated prior to decommissioning against the baseline environment at that time.</i> '. The Detailed DEMP will provide further information on the proposed environmental management proposed in line with relevant guidance at the time of decommissioning (proposed for 2091). The Environment Agency has been included as a named consultee in the Requirement 21 (Decommissioning and restoration) of the Draft DCO [AS-032] .
			Impact:	Risk that unmitigated decommissioning activities may result in environmental harm.	
			Solution:	The Applicant should provide further detail including the applicable measures already detailed in the oCEMP.	
		Additional comments:	Unlike the oCEMP, the oDEMP does not specify the use of bunded and impermeable refuelling areas for temporary compounds, inspection of fuel pipes/outlets, or mitigation of impacts from any necessary discharges to watercourses.		
EA-020	Water Environment	EA20 Firewater management for Substation	Issue:	Lack of clarity regarding the drainage and pollution mitigation measures for the 132kV Substations and 400kV Substations. Further details are required about	The only infrastructure within the 132kV and 400kV Project Substation areas that may have a risk of fire is the transformers which will be self-bunded to prevent any leaks from reaching watercourses. If pollution is detected it

ID	Theme	Representation			Applicant's Response
		Document Reference(s): APP-040 ES Volume 1: Chapter 4 – The Scheme; section 4.3.33 and 4.3.34; APP-045 ES Volume 1: Chapter 9 – Water Environment, section 9.7.8; APP-162 ES Volume 3: Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy, section 9.4.12; APP-197 Outline Operational Environmental		penstocks and management of firewater.	will be suctioned to a self-bunded (or similar) tank and removed from site for suitable disposal. This is set out and secured within the Outline OEMP [APP-197]. The tank system for the transformer bunded area is entirely separate to the wider lined drainage system for the compounds, no surface water runoff from the transformer areas would be discharged to the water environment. As such, the surface water management strategy for the Project and National Grid Substations does not need to consider firewater management or include penstock valves for the wider compounds (given the National Grid Substation will not incorporate transformers). The proposed surface water drainage system for the National and Project Substations will be sealed/lined with an impermeable membrane and have been designed to accommodate the 1 in 100 annual probability +45% allowance for
			Impact:	Uncontrolled firewater drainage from substations poses a risk of pollution to the water environment.	
			Solution:	Provide clarity regarding the substation drainage design and management of firewater with automated penstock valves (or similar). Ensure capacity in event of a fire to contain sufficient volumes of firewater to prevent release to environment, ensuring containment until subsequent disposal offsite.	

ID	Theme	Representation			Applicant's Response
		Management Plan, Table 4.4			climate change rainfall event, as set out in Section 9 of ES Volume 3: Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] and secured within the Design Principles, Parameters and Commitments [APP-213] (drainage design standard) and the Outline OEMP [APP-197] (impermeable membrane).
		Additional comments:	Provide a sealed drainage system to adequately contain and manage any firefighting effluent, or contaminated surface waters generated by a fire at the site. This will ensure that there is no discharge of polluted water to ground or surface water bodies. This should include: - Any system for the storage of contaminated firewater should have sufficient capacity to contain reasonable worst-case firewater and rainfall event volumes. - The system for containing firefighting effluent, eg. penstock valve, should close automatically, with a manual backup system in case of power failure, supported by a maintenance schedule. Confirm the trigger for closing a penstock. - Any equipment, such as oil transformers, should be		

ID	Theme	Representation		Applicant's Response	
			bunded, where possible. (We note APP-045 Chapter 9, section 9.7.8 says transformers will be selfbunded). Any contained firefighting water from the separators or SuDS would need to be removed by a specialist to an appropriate offsite treatment facility. We acknowledge that section 9.4.12 of the Outline Surface Water Drainage Strategy says “Due to the presence of Drinking Water Protection Zones and to manage the potential impact of contamination from surface water runoff it is proposed that the BESS, National Grid Substation and Project Substation drainage systems will be installed with an impermeable membrane”		
EA-021	BESS	EA21 Sequence of BESS construction and decommissioning	Issue:	In the list of activities that would be required to construct the BESS Area, ‘Installation of fire safety measures’ is listed last.	Section 3.2 (Safe BESS Construction) of the Outline BSMP [APP-200] already confirms that: <i>‘3.2.1 The BESS would be constructed in two distinct phases. Firstly, the civil works and balance of non-BESS plant and equipment construction would be</i>
			Impact:	Risk that fire water could be released into the	

ID	Theme	Representation			Applicant's Response
		Document Reference(s): APP-040 ES Volume 1: Chapter 4 – The Scheme; section 4.4.11;		environment if batteries and other equipment are installed on site prior to the construction of fully operational fire safety measures	<i>started. Then at a suitable point, the BESS equipment would be delivered to be installed on the foundations and connected to the balance of plant.</i> <i>3.2.2 The installation would be subject to pre-requisites such as a contractor emergency protocol detailing the actions to be taken in an emergency, including a construction ERP that would be coordinated with the relevant stakeholders and emergency services. In addition, installation would not take place until practical provisions were completed such as the water tanks being installed and filled for use in an emergency.'</i> The Applicant confirms that fire water containment systems would be installed as part of site works before the BESS are installed. BESS systems must be removed from site before fire protection infrastructure and firefighting water containment systems can be decommissioned.
		APP-200 Outline Battery Safety Management Plan (oBSMP)	Solution:	Ensure fire safety measures (specifically the sealed drainage with penstock valve), are in place prior to installation of the equipment. oBSMP should confirm that BESS batteries would be removed from site prior to the decommissioning and removal of any fire protection systems and surface water containment systems.	
EA-022	BESS		Issue:	Inadequate detail is provided regarding the management of damaged	The Applicant currently does not have definitive information regarding the specific BESS cycle requirements or

ID	Theme	Representation			Applicant's Response
		EA22 Management of battery replacement		or end of life batteries. We note that BESS could be replaced up to five times.	discharging periods. As the operational lifespan of a battery unit is inherently determined by its throughput, there is a correlation between usage and degradation. For example, the more cycles a unit goes through over time, the greater the possibility that replacement will be necessary to maintain the required storage and export capacity (Information provided in user query). By accounting for up to five replacements, the Applicant has ensured that a worst-case scenario for the replacement of equipment has been fully assessed within the Environmental Statement. ES Volume 3: Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] paragraph 9.11.4 states that the BESS may be split into 'compartments' of battery units, each with their own associated lined aggregate sub-base area and separated by lengths of access track. This would aid in the isolating and testing runoff, and remediation of affected areas in the event of a pollution incident.
		Document Reference(s): APP-040 ES Volume 1: Chapter 4 – The Scheme sections 4.5.32; APP-197 Outline Operational Environmental Management Plan, section 2.12.3; APP-200 Outline Battery Safety Management Plan, section 4.4.4	Impact:	Batteries can pose a water quality risk if they leak.	
			Solution:	Provide clarity regarding how batteries will be removed during replacement, and stored after removal prior to being taken offsite for appropriate disposal.	

ID	Theme	Representation			Applicant's Response
					The Applicant will update paragraphs 3.3.15 and 3.3.16 of the Outline BSMP [APP-200] at Deadline 1 to include the additional text in italics below: 3.3.15 In the event of a defective battery module or cell being identified, the defective module shall be immediately placed out of service and be electrically disconnected from the system. A specific risk assessment shall be conducted prior to the removal of the defective module to ensure the safety of employees and contractors. Specific protocols for storage and removal will fully align with the supplier's maintenance, decommissioning, and warranty stipulations. <i>Protocols will ensure that all credible pollution, fire and explosion protection safety risks are fully mitigated.</i> 3.3.16 Once a defective module is safely discharged or removed in accordance with the specific risk assessment, it shall be stored in an approved protective container suitable for the safe storage of BESS battery components prior to being transported from the defective unit to a dedicated safe location for inspection by

ID	Theme	Representation			Applicant's Response
					an authorised manufacturer's representative. <i>Storage location and protective container design will be approved at the detailed design stage by NFRS and the EA, detailed safety protocols will be included in the final BSMP.</i> Regarding appropriate disposal of batteries, this will depend on the BESS supplier arrangement and disposal stipulations at the time.
EA-023	BESS	EA23 Management of BESS firewater Document Reference(s): APP-045 ES Volume 1: Chapter 9 – Water Environment, section 9.7.8; APP-162 ES Volume 3: Appendix 9.1 – Flood Risk	Issue:	The surface water drainage system for the BESS will have an auto shutoff valve that activates in the event of the fire alarms sounding, however there is no mention of a manual closing option nor maintenance schedule. Details regarding the testing of captured firewater have not been provided. Water will then likely be tankered away, however alternative	ES Volume 3: Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [APP-162] paragraph 9.11.4 states that the BESS may be split into 'compartments' of battery units, each with their own associated lined aggregate sub-base area and separated by lengths of access track. This would aid in the isolating and testing of surface water runoff, and remediation of affected areas following a fire incident. Section 4.5.5 of Outline BSMP [APP-200] confirms a secondary control

ID	Theme	Representation		Applicant's Response	
		Assessment & Outline Surface Water Drainage Strategy, section 9.4.12, 9.9.13, 9.9.14 and 9.11.8; APP-197 Outline Operational Environmental Management Plan, Table 3.4; APP-200 Outline Battery Safety Management Plan, sections 4.3.2, 4.4.4 and 4.5.9		disposal options are unclear.	manual override facility. Section 4.5.6 sets out the maintenance, testing, and inspection requirements to be included in the final BSMP. In addition, the following text will be added to the Outline BSMP [APP-200] and Submitted at Deadline 1: <i>'Isolation will be capable of automatic activation (from the BESS fire alarm system) during an incident, with manual override provided as a secondary control. Isolation valves will be designed to operate on a failsafe basis, such that in the event of power loss, system fault or damage during an incident, the default position is closed to maintain containment. Power supply arrangements may include independent or solar-backed systems where appropriate, ensuring that valve operation is resilient and not reliant solely on the primary site power infrastructure. The automatic and manual isolation systems would be subject to regular operational maintenance to ensure the reliability of the firewater isolation system in a flood event. The</i>
			Impact:	Risk of pollution to the water environment if potentially contaminated water is not contained and disposed of correctly.	
			Solution:	Provide details about manual penstock operation, testing and maintenance. Once contaminated water is removed, prior to the penstock reopening, the drainage system will need cleaning to ensure there is no potential contaminants which could be resuspended when the drainage system reopens. This should be written into the post-incident recovery plan.	
		Additional comments:	We acknowledge that section 9.4.12 of the Outline Surface Water Drainage Strategy states "Due to the presence of Drinking Water Protection Zones and to manage the potential impact of		

ID	Theme	Representation	Applicant's Response
		contamination from surface water runoff it is proposed that the BESS, National Grid Substation and Project Substation drainage systems will be installed with an impermeable membrane". Section 4.5.9 of OBSMP says "retained water within the isolated drainage and containment system will be sampled and analysed to determine the presence and concentration of contaminants". Sampling should use MCERTS approved methods, be sent to UKAS accredited laboratories and tested against list of hazardous substances (Environmental Quality Standards Directive (EQSD) list for WFD assessments - GOV.UK), in agreement with the Environment Agency. If the Applicant is considering discharging with surface water, after testing, they should be aware it may require a permit: Discharges to surface water and groundwater: environmental permits - GOV.UK	<i>detail of this maintenance will be included in the detailed Battery Safety Management Plan once the detailed design of the Proposed Development has been completed.'</i> Paragraph 4.5.9 of the Outline BSMP [APP-200] will be updated with the additional text in italics below: <i>'Following a fire event, retained firewater will be sampled by a suitably competent person and submitted to a UKAS accredited laboratory for analysis using UKAS and MCERTS accredited methods, where applicable. The samples will be analysed to determine the presence and concentration of contaminants and checked against the hazardous substances listed in the 'surface water pollution risk assessment for your environmental permit' guidance. If contaminated (polluted), the water will be removed from site by tanker for treatment at an appropriate offsite facility. If testing confirms that the water is suitable for discharge, it will be released to the local drainage network under controlled conditions, in</i>

ID	Theme	Representation		Applicant's Response
			It should be noted that the time taken to issue a Groundwater Activity Permit may be substantial. This is likely to result in significant delays to resuming operation of the BESS or Substation facility and carries a significant risk that further rainfall may result in the drainage system being overwhelmed and a pollution event occurring. We encourage the approach of tankering away the potentially contaminated firewater.	consultation with the relevant regulators. Where required, an Environmental Permit or other applicable consent will be obtained prior to discharge. No release will occur without prior approval from the relevant regulator, and all actions will be undertaken in accordance with applicable environmental permitting and pollution control legislation. This approach ensures that environmental protection is maintained under both normal and emergency conditions.'
EA-024	BESS	EA24 Management of BESS/substation aggregate drainage layer Document Reference: APP-162 Appendix 9.1 Flood Risk Assessment & Outline Surface Water Drainage	Issue: Insufficient detail regarding the management of the aggregate drainage layer and impermeable lining at BESS and Substation sites for surface water attenuation and storage. Impact: Risk of pollution from contaminated aggregate if decontamination procedures are insufficient; or if the impermeable lining is damaged during remedial works.	The only infrastructure within the Project Substation areas that may have a risk of fire/significant pollution risk is for transformers which will be self-bunded to prevent any leaks from reaching watercourses. If pollution is detected it will be suctioned to a self-bunded (or similar) tank and removed from site for suitable disposal. This is set out and secured within the Outline OEMP [APP-197]. ES Volume 3: Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018]

ID	Theme	Representation			Applicant's Response
		Strategy (Substation and BESS drainage)	Solution:	Provide details of the proposed measures to decontaminate the impermeable BESS and Substation drainage systems, including the removal and cleaning or replacement as necessary of any components of the drainage system prior to any shut-off valves being re-opened.	paragraph 9.11.4 states that the BESS may be split into 'compartments' of battery units, each with their own associated lined aggregate sub-base area and separated by lengths of access track as shown on ES Volume 2: Figure 4.1 [APP-059] . This would aid in the isolating and testing of surface water runoff, and remediation of affected areas following a fire incident.
		Additional comments:		Where gravel is proposed to be used within an impermeable drainage basin, the operator must demonstrate how they will manage accumulation of silt and pollutants within the base of the gravel. Contaminants from a fire event may accumulate in the gravel even if firewater runoff is identified as being suitable for release. These contaminants would then be released into the natural	Requirement for decontamination of the aggregate substrate within the BESS and substations would therefore be focussed on the BESS and the Applicant notes that clarity is required regarding the decontamination of the aggregate drainage layer and impermeable lining. These additional details will be provided within the detailed OEMP at the detailed design stage, including methodology for removal, cleaning and reinstatement of the aggregate such that the impermeable membrane would be maintained and protected from damage and repair if necessary.

ID	Theme	Representation	Applicant's Response
			environment over longer periods of time if not removed or decontaminated. The Applicant should also note that water used for decontamination of the drainage system following removal of contaminated firewater would also require management as this would also be potentially contaminated. The Applicant should also demonstrate how they propose to avoid damage to the impermeable lining during any substrate remediation, and how any such damage would be identified and remediated should this occur. We recommend that the Applicant considers zoning of the BESS units, so that a fire in one area does not risk contaminating a larger area, thus requiring more

ID	Theme	Representation	Applicant's Response
			extensive remediation following a fire event. If this occurs during a period of high rainfall this could cause capacity issues and significant disposal costs. Isolatable zones should be easier to manage, enabling unaffected areas of the site to discharge as normal. Section 9.11.4 of Chapter 9 states that the BESS may be split into 'compartments' of battery units with independent lined sub-base areas to help isolate, test and remediate contaminated runoff, which may address this concern. If the drainage aggregate becomes contaminated and may act as an ongoing source of pollution following the removal of contaminated firewater remediation measures may necessitate the temporary local removal of BESS

ID	Theme	Representation			Applicant's Response
				units. We recommend that the BESS design accommodates this possibility.	
EA-025	Water Environment	EA25 BESS and substation drainage Document Reference(s): APP-162 Appendix 9.1 Flood Risk Assessment & Outline Surface Water Drainage Strategy (BESS and Substation drainage)	Issue:	It is not always clear that the entirety of the surface water drainage infrastructure for the BESS, National Grid Substation and Project Substations would be impermeable and designed to prevent uncontrolled surface water runoff as well as subsurface infiltration.	ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] states that the BESS and Substations are designed to have a permeable surface (excluding internal access tracks) with underlying aggregate sub-base. The sub-base system will be lined with an impermeable membrane to prevent the infiltration of runoff from the sub-base to the strata below. The outflow from the proposed surface water drainage system will be controlled via a flow control to an adjacent watercourse, with additional penstock valve upstream of the control for the BESS for firewater runoff control management. This is secured through the Outline BSMP [APP-200] . The Outline CEMP [APP-196] and Outline OEMP [APP-197] set out that all
			Impact:	Surface water drainage infrastructure at these features may result in uncontrolled discharge of potentially contaminated runoff if design is inadequate.	
			Solution:	It should be clearly stated that the surface water drainage systems at these features would be impermeable and designed	

ID	Theme	Representation		Applicant's Response
			to prevent infiltration and uncontrolled surface water runoff. The Applicant should also identify how damage to the impermeable membrane from construction activities such as piling would be avoided. Substations should incorporate measures to ensure that contaminated runoff from plant and equipment containing polluting and hazardous substances, such as oil-filled transformers, would be contained in the event of a fire.	chemicals will be stored within a secure and bunded impermeable area. The infrastructure that is considered to contain a hazardous substance is transformers which will be self-bunded to prevent any leaks from reaching watercourses. If pollution is detected it will be suctioned to a self-bunded (or similar) tank and removed from site for suitable disposal. This is set out and secured within the Outline OEMP [APP-197]. The Applicant notes that clarity is required regarding remediation activities and the impermeable lining at the BESS site. Text will be provided within the detailed Operational Environmental Management Plan at the detailed design stage.
		Additional comments:	The report states "Due to the presence of Drinking Water Protection Zones and to manage the potential impact of contamination from surface water runoff it is proposed that the BESS, National Grid Substation and Project Substation drainage systems will be installed with an impermeable	Requirement 11 of the Draft DCO [AS-032] also secures that no part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and approved by the relevant planning authority. This approval will be in consultation with the

ID	Theme	Representation		Applicant's Response
			membrane to prevent interaction with the strata underneath."	Environment Agency amongst other named consultees.
EA-026	Management Plans	EA26 Emergency response plan Document Reference(s): APP-054 ES Volume 1: Chapter 18 – Other Environmental Matters, Table 18.2; APP-196 Outline Construction Environmental Management Plan, Tables 3.4 and 4.4; APP-198 Outline Decommissioning Environmental Management Plan, Tables 3.4 and 4.4;	Issue: Insufficient detail regarding the content of the site-specific Emergency Response Plan (ERP) which will be secured via the oBSMP. The oCEMP and oDEMP state 'An Emergency Response Plan will include details for pollution prevention' to be prepared at the detailed design stage, however further details should be provided at this stage.	The Applicant will update paragraph 4.4.1 of the Outline BSMP [APP-200] to the following, at Deadline 1: <i>'The BESS Area will have a robust and validated emergency response plan (ERP), developed in consultation with NFRS. Where an incident has the potential to affect surface water or groundwater, the ERP will include priority notification and escalation procedures for the Environment Agency (EA) and, where applicable, downstream receptors such as licensed abstractors. All relevant incident response parties, including the EA, the lead local flood authority and the site operator, will be made aware of the ERP and will have immediate access to it. Notification procedures will be activated at the earliest practicable stage of any incident with the potential to affect controlled waters.'</i>
			Impact: An ERP is important for managing high risk situations quickly and effectively, and inadequate planning can increase the risk of environmental damage.	
			Solution: We request that the Applicant develops this ERP in consultation with	
				Paragraph 5.1.8, final bullet, of the Outline BSMP [APP-200] will be amended to:

ID	Theme	Representation		Applicant's Response
		APP-200 Outline Battery Safety Management Plan, section 4.4.4 and 4.5.14	the relevant local authority planning officer, emergency services, and the Environment Agency in relation to responding to flood warnings and pollution events. The ERP should identify the importance of notifying downstream river/groundwater abstractors in the event of a fire should impacts to surface water and/or groundwater occur. All relevant incident response parties should be made aware of the ERP and provided with immediate access to it.	<i>'ERPs covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation with NFRS, the Environment Agency (EA), and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community.'</i> The Applicant notes that further details are required regarding the site-specific Emergency Response Plan (ERP). The ERP will be developed in consultation with the relevant local authority planning officer, emergency services, and the Environment Agency in relation to responding to flood warnings and pollution events. The ERP can only be provided at the detailed design stage alongside the detailed Environmental Management Plans. Requirement 6 of the Draft DCO [AS-032] ('Battery safety

ID	Theme	Representation			Applicant's Response
					management'), requires the EA and Norfolk Fire and Rescue Service to be consulted on the detailed battery safety management plan.
EA-027	Ground Conditions Water Environment	4 Groundwater and Contaminated Land EA27 Groundwater dependent terrestrial ecosystems Document Reference(s): APP-039 Volume 1 Chapter 3 – The Order Limits (Section 3.4.9); APP-045 Volume 1 Chapter 9 – Water Environment.	Issue:	Not all internationally designated sites within 1km of the Proposed Development are listed.	Table 9.4 of ES Volume 1: Chapter 9 – Water Environment [APP-045] makes reference to Hedenham Wood SSSI (Hedensham Wood SSSI is not recognised and this may be a typographical error in the EA RR response), Fritton Common and Pulham Market SSSIs which are identified as High sensitivity. Fritton Common and Pulham Market SSSIs are identified as GWDTEs in Table 9.4, however it is acknowledged that Hedenham Wood SSSI is not.
			Impact:	Potential for impacts to some designated sites including Groundwater dependent terrestrial ecosystems (GWDTEs) to be overlooked.	
			Solution:	The Applicant should review the list of designated sites and assess any impacts as necessary.	
		Additional comments:	Our records show the following SSSIs within 1km of the Proposed Development have been omitted: Hedensham Wood SSSI		

ID	Theme	Representation		Applicant's Response
			- Fritton Common SSSI (Listed, but should also be highlighted as a GWDTE) - Pulham Market Big Wood SSSI (Also a GWDTE)	
EA-028	Scheme Description Ground Conditions	EA28 Piling and foundations Document Reference(s): APP-040 Volume 1 Chapter 4 – The Scheme (Table 4.1)	Issue:	Scheme parameters, including a maximum depth of 12m for the piled foundations for the Project Substations, National Grid Substation and BESS are provided in Table 4.2, 5.3 and 4.4 of the Design Principles, Parameter and Commitments [APP-213]. The ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184] and ES Volume 1, Chapter 16 Ground Conditions [APP-052] have been undertaken in accordance with the scheme parameters stated in Table 4.1 of ES Volume 1, Chapter 4 The Scheme [APP-040].
			Impact:	
			Solution:	

ID	Theme	Representation			Applicant's Response
				interaction with groundwater.	
EA-029	Ground Conditions	EA29 Lifespan and decommissioning of cabling Document Reference(s): APP-040 Volume 1 Chapter 4 – The Scheme (Section 4.5.32, 4.6.6); APP-052 Chapter 16 Ground Conditions (Section 16.8.25); APP-163 Water Framework Directive Assessment (Section 2.5.14); APP-197 Outline Operational Environmental	Issue:	The programme of replacement activities does not specify the operational lifespan of below ground cabling.	In the Outline OEMP [APP-198], which is secured by Requirement 14 of the Draft DCO [AS-032], it states that along the CRC, operational activity will consist of routine inspections (schedule to be determined) and any reactive maintenance, such as where a cable has been damaged. To the extent that repairs are required to any part of the cable, the DCO enables the necessary access to the CRC and associated works for such repairs to be undertaken during the operational phase. If any sections of cable were unable to be repaired during the operational phase, sections of cable could be replaced as part of the maintenance activities assessed. It would not however, require a wholesale replacement of the entire cable at once. Instead, any programme of cable repair or replacement would be staged into smaller sections to maintain the electrical export to the National Grid.
			Impact:	Potential for cabling to deteriorate and release contaminants into the groundwater environment if not suitably designed.	
			Solution:	The Applicant should confirm that the lifespan of below ground cabling would as a minimum be commensurate with the Operational Phase of the Proposed Development. The Applicant should commit to review the best practicable environmental option prior to commencement of decommissioning. This should be captured in the Commitments Register.	

ID	Theme	Representation			Applicant's Response
		Management Plan (Section 2.12.3); APP-198 Outline Decommissioning Environmental Management Plan (Section 3.1.3) APP-221 Commitments Register (Table 1)			
		Additional comments:	Section 4.6.6 states "The mode of removing the cabling would be dependent upon government policy and good practice at the time. Currently, leaving the cables in situ is seen as the most environmentally acceptable option as it avoids disturbance to overlying land, habitats and neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through the extraction point, leaving the ducting and jointing bays in place. This would avoid the need to open up the entire length of the cable route."		

ID	Theme	Representation		Applicant's Response	
			We recommend that the Applicant considers the potential need for future removal as part of the pre-construction design process and where practicable enable cable removal should this be determined necessary at the time of decommissioning.		
EA-030	Water Environment	EA30 Thermal impacts on groundwater Document Reference(s): APP-044 Volume 1 Chapter 8 – Ecology and Biodiversity (Sections 8.9.59, 8.9.125, 8.9.255 & 8.9.372); APP-045 Volume 1 Chapter 9 – Water Environment (Sections 9.7.3, 9.8.26 & 9.8.58);	Issue:	Insufficient evidence provided to discount potential thermal effects on sensitive groundwater receptors.	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. 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
			Impact:	Potential for thermal plume(s) generated by energised high voltage cables during the Operational phase to impact sensitive groundwater receptors, principally Groundwater Dependent Terrestrial Ecosystems.	
			Solution:	The Applicant should further assess the potential for significant effects from thermal emissions from	

ID	Theme	Representation		Applicant's Response
		APP-162 Appendix 9.1 Flood Risk Assessment & Outline Surface Water Drainage Strategy (Section 8.3.8)	buried high voltage electrical cables.	<i>"in the first instance, the developer should ensure that where practicable the proposed cabling... does not cause pollution of surface water and groundwater"</i> 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 [APP-197]. Where relevant, the Outline CEMP [APP-196] will also be updated to reflect any design or construction requirements arising from the assessment process.
		Additional comments:	The report states that "The thermal dynamics of the sheathed cables are limited to their immediate proximity and therefore will not significantly affect the thermal dynamics" with regard to Fritton Grange Meadows CWS, Lower Spring Wood CWS, peat deposits, watercourses and ditches. No further information is provided to support these statements. Section 9.8.26 assesses impacts of heat pollution from cables during the decommissioning phase. We presume that cabling would be de-energised prior to decommissioning and therefore no longer act as a source of potential thermal pollution. Similarly we presume that until commissioned, buried electrical cables would not act	

ID	Theme	Representation		Applicant's Response
			as a source of heat during the construction phase. The Applicant should consider whether trenchless crossings in areas known to contain peat deposits (i.e. CRC7 crossing) can be targeted to strata underlying the peat, to minimise the potential for thermal effect to cause degradation. An informative is provided at the end of this response, providing further clarification and advice on assessing the potential for thermal impacts to groundwater for this Proposed Development. Any necessary mitigation should be committed to within the outline CEMP.	
EA-031	Water Environment – Water Framework Directive	EA31 Cable trenches as preferential flow pathway	Issue:	No mitigation is identified to prevent cable trenches from acting as a preferential flow pathway for pollutants or enabling mixing of groundwater units. New preferential flow pathways could enable mobilisation of
			Impact:	
		Document Reference(s)		As described in the ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184], the Sources of Potential Contamination (SPCs) within the Study Area, i.e. those which could be mobilised by ground disturbance during construction, are limited to the former airfields RAF Hardwick (1), RAF Seething (2), the

ID	Theme	Representation		Applicant's Response
		APP-045 Volume 1 Chapter 9 – Water Environment; APP-163 Appendix 9.2 Water Framework Directive (WFD) Assessment	contamination, mixing of groundwater bodies and/or affecting groundwater levels in sensitive sites with shallow groundwater such as peat deposits and GWDTEs. Solution: Provide a commitment that where localised sources of mobile contamination are encountered, commit to use impermeable trench lining and clay stanks or similar to prevent the trench from acting as a new preferential flow pathway. Clay stanks, trench breakers or similar should also be used to prevent distinct shallow groundwater units from mixing, should these be encountered.	former Market Lane Pit (3) and a former refuse tip in Sub-Site 4B (4). Of these only RAF Seething intersects with the Cable Route, in CRC14. It is however acknowledged that underground cabling will also be present within other areas of the Site. The Preliminary Risk Assessments (PRAs) for SPCs 1-3 estimate risks to surface water and groundwater of Very Low to Low. The PRA for SPC4 estimates risks to surface water and groundwater of Moderate, noting that this is the baseline condition and is unchanged by the construction of the Scheme as this area is to be used for ecological mitigation only. 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. As described within the ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184] "embedded
		Additional comments:	Appendix B and Appendix C of the Outline Cable Route Construction Statement presents indicative cross sections of proposed cable installation	

ID	Theme	Representation		Applicant's Response
			within trenches. This shows the cables to be set in a blinding layer overlaid by excavated spoil. Both the blinding layer and overlying disturbed soil may act as a preferential flow path for groundwater and/or mobile contamination, where encountered.	<i>mitigation will also be provided by design. Where possible the design of the Scheme will seek to avoid SPCs" and "where avoidance is not possible, the SPCs will be investigated".</i> 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 this basis, the cable trench will not interact with SPCs (including unexpected SPCs) as the SPCs will either be avoided or assessed and mitigated. Whilst the trenches could act as a pathway, they will not form part of a contaminant linkage and therefore it is not considered necessary to include further mitigation measures for the prevention of mobilisation of contamination within the cable trenches.
EA-032	Water Environment	EA32 Categorising Scale of Effect	Issue: Table 9.6 provides a matrix for categorising scale of effect. We do not consider the scale of effect values to	It is acknowledged that ES Volume 1, Chapter 9 – Water Environment [APP-045] Table 9-6 'High' Sensitivity goes from 'Major' for 'Medium' magnitude to

ID	Theme	Representation			Applicant's Response	
	Ground Conditions	Document Reference: APP-045 Volume 1 Chapter 9 – Water Environment (Table 9.6);		be suitable; and the matrix is inconsistent with the equivalent table presented in Chapter 16 – Ground Conditions, despite significant similarities in receptor type and type of impact.	'Minor' for a 'Low' magnitude, a two category drop in magnitude value. We would note that the 'Medium' magnitude has not been utilised and therefore does not affect the assessment of likely effects undertaken for the water environment in ES Volume 1, Chapter 9 – Water Environment [APP-045] .	
		APP-052 Chapter 16 Ground Conditions (Table 16.4)	Impact:	Scale of effect likely to be underestimated, and the evaluation of otherwise comparable impacts between Water Environment and Ground Conditions chapters is not possible.		It is also acknowledged that Table 9-6 uses less magnitude of change categories to that of ES Volume 1, Chapter 16 – Ground Conditions [APP-052] Table 16.4, however the Significance of Effect values across the Very Small and Negligible magnitude columns are very similar.
			Solution:	The Applicant should review the scale of effect categories and revise the table(s) accordingly.		The Assessment of Likely Effects (Section 9.8 of ES Volume 1, Chapter 9 – Water Environment [APP-045]) sets out the worst case scenario based on the highest receptor sensitivity for the impact (in most cases this is 'Very High' sensitivity'), and due to the embedded mitigation measures to be implemented for the Scheme as set out in Section 9.7 of the chapter, the magnitude of change
		Additional comments:	Using the matrix provided, a one magnitude scale change from 'medium' to 'low' for a 'high' sensitivity receptor results in a two-category severity change from 'major' (significant) to 'minor' (not significant) impact, whereas a similar scale of			

ID	Theme	Representation		Applicant's Response
			change for a 'very high' sensitivity receptor results in a one-category severity change. Table 9.6 uses a different number of sensitivity and magnitude categories to the equivalent table (Table 16.4) in Chapter 16 Ground Conditions, despite significant similarities in receptor type and type of impact.	is considered to be 'Low' or 'Negligible', resulting in a 'Minor' and 'Not Significant' impact for all bar one impact. This is similar to the assessment undertaken in ES Volume 1, Chapter 16 – Ground Conditions [APP-052]. For the impacts arising from the reduction in the application of agricultural chemicals/fertiliser on nutrient loading, this is again considered based on a worst-case 'Very High' sensitivity with a 'High' magnitude of change, with the impact considered to be 'Major' and 'Significant'.
EA-033	Water Environment	EA33 Water quality impacts on water supplies	Issue:	Residual effects for Water supplies (private/public) during the construction and decommissioning phases includes water quantity impacts but does not include water quality impacts from spills and pollutants.
			Impact:	Residual risk of contamination of water
		Document Reference: APP-045 Volume 1 Chapter 9 – Water Environment (Table 9.7)		The Applicant notes this comment. This will be corrected within Table 9.7 through an update of ES Volume 1, Chapter 9 – Water Environment [APP-045] at a later deadline. Notwithstanding the above, private and public water supplies have been considered within the assessment and through the incorporation of the embedded mitigation set out and secured within the Outline CEMP [APP-

ID	Theme	Representation			Applicant's Response
				supplies has not been considered.	196] and Outline DEMP [APP-198] , the impacts on public and private water supplies from the potential mobilisation of contaminants from the Scheme for all phases is Not Significant.
			Solution:	Contamination impacts should be included for water supplies (public/private abstractions).	
EA-034	Water Environment	EA34 Source Protection Zones for Public water supplies Document Reference: APP-045 Volume 1 Chapter 9 – Water Environment (Table 9.7, Section 9.6.22)	Issue:	The extents of Source Protection Zones (SPZs) are not accurately described. Public water supplies are not included in Table 6.7 (SPZs for private water supplies are included and assigned Medium sensitivity). Section 9.6.22 incorrectly states that only the northern part of the Order Limits area lies within SPZ3.	The Applicant notes that this comment refers to Table 6.7 however it is believed that this should refer to Table 9.7 as set out in the document reference. Public water supplies are included within Table 9.7 although it is noted that the table does not specifically mention SPZs with regards to public supplies. The Applicant notes the error in ES Volume 1, Chapter 9 – Water Environment [APP-045] paragraph 9.6.22 and this will be corrected at a later deadline. The Applicant also notes that the SPZ1 and SPZ2 located c. 500m to the south-west of the BESS and Project Substation 1 is located within the Study Area (2 kilometres as stated in paragraph 9.5.3
			Impact:	Risk that impacts on public water supplies are not assessed.	
			Solution:	The Applicant should include public water supply	

ID	Theme	Representation		Applicant's Response
			SPZs in the assessment, and reflect the presence of SPZ2 and SPZ1 of a public water supply abstraction within the Study Area close to Site 1/ the BESS and Substations. Private groundwater abstractions should be considered to be High sensitivity receptors. The locations and extents of SPZs relative to the Order Limits and Study Area should be accurately reflected.	of ES Volume 1: Chapter 9 – Water Environment [APP-045]. SPZ1 and SPZ2 are listed as 'Very High' and 'High' receptors respectively in Table 9.3 of ES Volume 1, Chapter 9 – Water Environment [APP-045]. Public water supplies have been identified as 'Medium' to 'Very High' sensitivity within Table 9.7 of the chapter, with private water supplies (SPZs) identified as 'Medium'. The Applicant notes that private water supplies are identified as 'Medium' which pertains to SPZ3, and the sensitivity definition can be updated at a later deadline. The assessment of impacts on all water receptors identified (including public and private water supplies) is addressed in ES Volume 1, Chapter 9 – Water Environment [APP-045] and considers the highest sensitivity value of 'Very High' (SPZ1) as a worst case. The assessment also considers the embedded mitigation measures as set
		Additional comments:	Although the northern part of the Order Limits is situated within SPZ3, the southwestern portion of the Order Limits, inclusive of key infrastructure including the BESS, NG Substation and Project Substations, is also situated within an SPZ3 and situated within approximately 500m of SPZ1 of a public water abstraction.	

ID	Theme	Representation			Applicant's Response
					out and secured within the Outline CEMP [APP-196] , the Outline OEMP [APP-197] and the Outline DEMP [APP-198] , and therefore the residual impact is assessed as 'Not Significant' for water receptors (including private water supplies/SPZ1 and SPZ2), with the exception of the cessation of agricultural use/chemicals/fertilisers which is assessed as Significant Major Beneficial.
EA-035	Ground Conditions	EA35 Risk from historic ground contamination Document Reference(s): APP-052 Volume 1 Chapter 16 – Ground Conditions (Section 16.6.64); APP-186 Appendix 16.1 Phase 1 Ground Conditions Assessment (Section 3.4.26 &	Issue:	The potential risks of new contamination pathways from historic contamination to private and licensed abstractions may have been underestimated.	For Deadline 1 the text in the Outline CEMP [APP-196] Tables 3.4, 3.12, 4.4 and 4.12 in relation to FWRA will be updated to include the BESS and National Grid Substation in addition to the Project Substations. The assessment of Likely Significant Effects presented in ES Volume 1, Chapter 16 – Ground Conditions [APP-052] has been undertaken on the basis of FWRA forming part of the embedded construction phase mitigation for the National Grid Substation and BESS. On the basis of the assessment undertaken, using the information provided by the EA, BGS and LPA,
			Impact:	Potential for contamination of private and permitted abstractions.	
			Solution:	The Applicant should provide further information to support this conclusion, and/or commit to additional mitigation.	

ID	Theme	Representation		Applicant's Response
		3.4.29. Table 5.5-5.6)		credible risks to PWS and permitted abstractions have not been identified.
		Additional comments:	The report refers to the lack of credible linkages between private water abstractions and permitted abstractions – we presume this should refer to linkages between historic sources of contamination (SPCs) and abstractions. Section 3.4.26 of Appendix 16.1 identifies four private water supplies within 250m of former RAF Seething (SPC 2), all of which are indicated to abstract from the Chalk Principal aquifer. The report concludes that as cable trenches would extend to approximately 2.0 metres below ground level (mbgl) and PV Array foundations would extend to approximately 4 mbgl at most, these would be unlikely to create a preferential flow pathway. However, trenchless crossings CRC9A and CRC9B, and the Sub-Site 10C Project Substation could both result in ground disturbance (and possible pathway creation) to a maximum of 12 mbgl.	The Conceptual Site Model is such that there are no credible contaminant linkages between the identified SPCs and the PWS and permitted abstractions either within the Order Limits or the Study Area. The Outline CEMP [APP-196] requires that a Foundation Works Risk Assessment (FWRA) is prepared for the BESS, National Grid Substation and any other structures requiring deep foundations and/or piling such as the 132kV and 400kV Substations, informed by the post-consent ground investigation. It further requires that the Applicant undertakes Hydrogeological Risk Assessment wherever trenchless crossings interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors. All assessments and the geotechnical and geoenvironmental ground investigation will be undertaken in

ID	Theme	Representation	Applicant's Response
		By comparing the locations of potential historic sources of contamination (SPCs) presented in Figure 16.3 and the locations of private water supplies presented in Figure 16.5, we note there are several BGS water wells and EA licensed extractions within the Study Area in locations within, or close to, SPC2 (former RAF Seething). Although this area is indicated to be underlain by Diamicton (Secondary (undifferentiated) aquifer), Figure 16.4 indicates that the maximum design scenario depth of piling for the Site 10 substation (12 mbgl) and maximum design scenario depth for trenchless drilling (12 mbgl) are close to the minimum recorded thickness of Diamicton in BGS borehole records in that area (12.2m in record TM29NE7). Although the proposed Substation position as indicated in APP059 Figure 4.1 and the location of proposed trenchless crossing CRC9A indicated in Appendix A Sheet 4 of APP-216 Outline Cable Route Construction Statement lies outside	accordance with the prevailing guidance at the time of writing / specification. The Outline CEMP [APP-196] includes mitigation measures relating to the prevention of new contamination during the construction phase, these include locating temporary construction compounds away from watercourses, management of compound runoff, controls on chemical storage, use of oil drip trays, and "<i>all reasonably practicable measures will be taken to prevent the deposition of sediment in, and the pollution by sediment of, any watercourse, arising from construction activities</i>". Further measures are included within the Outline CEMP [APP-196] relating to the operational phase including controls on fuel and chemical storage and measures for leak/spill control, substation and BESS runoff, and fire water management.

ID	Theme	Representation	Applicant's Response
		the indicative footprint of SPC2 (former RAF Seething), this feature lies within 250m of the proposed Site 10 Substation and within 300m of CRC9A. We consider that these features should be subject to Hydrogeological Risk Assessments informed by local ground investigation to ensure that these works do not create a mobilisation pathway for contamination associated with the SPC, or create a new pathway for spills and leaks during the construction, operation or decommissioning phases to impact groundwater quality. Section 3.4.29 identifies two potentially active private groundwater supplies or permitted abstractions at 130m south-west of Sub-Site 7A, which may not abstract from the Chalk Principal aquifer. Impacts to these abstractions from mobilisation of existing contamination were discounted due to the absence of an identified SPC within 250m, however the potential for spills and leaks due to construction, operation and	

ID	Theme	Representation		Applicant's Response
			decommissioning of the Proposed Development has not been considered.	
EA-036	Water Environment – Water Framework Directive	EA36 Risks to aquifer from deep foundations and trenchless drilling Document Reference(s): APP-163 Appendix 9.2 Water Framework Directive Assessment (Section 3.2.12); APP-184 Appendix 16.1 Phase 1 Ground Conditions Assessment (Section 3.4.22); APP-196 Outline Construction Environmental Management Plan	Issue:	Risks to the WFD groundwater body (Principal aquifer) from piled/ deep foundations and/or trenchless drilling have not been assessed. These activities could create new preferential flow pathways for contamination during the construction, operation and decommissioning phases. Risk of impacts to water quality in the Principal aquifer. The WFD Assessment should account for the potential for migration pathways through the superficial Diamicton deposits. The Applicant should carry out a Foundation Works Risk Assessment (FWRA), For Deadline 1 the text in the Outline CEMP [APP-196] Tables 3.4, 3.12, 4.4 and 4.12 in relation to FWRA will be updated to include the BESS and National Grid Substation in addition to the Project Substations. The assessment of Likely Significant Effects presented in ES Volume 1, Chapter 16 – Ground Conditions [APP-052] has been undertaken on the basis of FWRA forming part of the embedded construction phase mitigation for the National Grid Substation and BESS. All assessments and ground investigation will be undertaken in accordance with the prevailing guidance at the time of writing / specification. The Outline CEMP [APP-196] requires the Applicant to undertake FWRA to assess the risks to the WFD groundwater body (Principal Aquifer) associated with the construction of the BESS, National Grid Substation and any other structures requiring deep
			Impact:	
			Solution:	

ID	Theme	Representation		Applicant's Response
		(Tables 3.4 & 4.4. Section 3.12)	informed by local ground investigations to at least the maximum design scenario piling, foundation construction and drilling depth, for all proposed BESS and Substation structures and trenchless crossings. The selected methodology should avoid creating a migration pathway through any overlying superficial deposits. FWRA should also be produced for PV array foundations in areas potentially affected by contamination such as former RAF Seething, former RAF Hardwick and potentially infilled historic mineral extraction pits. Ground investigation data should be acquired post-consent to inform foundation construction details. This should include assessment of the potential	foundations and/or piling such as the 132kV and 400kV Substations, informed by the post-consent geotechnical and geoenvironmental ground investigation (also included as a mitigation measure within the Outline CEMP [APP-196]). . The Outline CEMP [APP-196] further requires the Applicant to undertaking Hydrogeological Risk Assessment wherever a trenchless crossing interacts with Principal or Secondary A aquifers or passes beneath surface watercourses or sensitive ecological receptors, informed by the post-consent geotechnical and geoenvironmental ground investigation (also included as a mitigation measure within the Outline CEMP [APP-196]). On the basis of the assessments undertaken, the Conceptual Site Model and the shallow nature of the proposed PV array foundations, the Applicant does not consider that FWRA should be necessary for proposed PV arrays within areas of the former RAF Hardwick and RAF Seething airfields. Nonetheless, if the post-consent ground investigation finds potentially mobile contamination is

ID	Theme	Representation		Applicant's Response
			for pollutant pathways through the Diamicton deposits where present. All trenchless crossings which may interact with Principal or Secondary A aquifers, surface watercourses or sensitive ecological sites should be supported by a Hydrogeological Risk Assessment informed by intrusive ground investigation data. This should be committed to via the outline CEMP.	present within these areas and that a groundwater body that could be impacted is present within the near-surface soils (i.e., within the depth of the proposed PV array foundations), then FWRA can be undertaken. The Applicant considers it unlikely that contamination is present within the areas of former airfield within the Order Limits given that the airfield infrastructure within the Order Limits was limited to areas of runway, perimeter road and hardstands, with the technical sites, hangars, fuel stores at considerable distance from the Order Limits, and any contamination that may have occurred is now likely to be dispersed following at least fifty years of agricultural use. PV arrays or other below ground infrastructure are not proposed within the limited areas of former infilled mineral workings (SPC3 – Market Lane Pit within sub-Site 8B, and SPC4 – Former refuse tip within sub-Site 4B), and therefore in absence of any works, FWRA in these areas will not be required.
		Additional comments:	The potential for interaction between deep Substation piling activities and/or trenchless drilling methods, and the underlying Principal aquifer, is of concern. This is of particular concern in areas found to have limited thickness of overlying Diamicton, or where the exploratory hole record is limited, principally for the proposed Project Substations in Sites 4, 5, 7 and 10.	

ID	Theme	Representation	Applicant's Response
		It should be noted that Diamicton deposits (Lowestoft Formation) are not an aquiclude, and by their glacial nature are variable in composition. They may be of generally higher clay content but exhibit spatial variation and can incorporate zones of higher transmissibility where sand lenses and buried channels and valleys are present. It should not be presumed that these deposits would not be capable of transmitting mobile contamination into the underlying Principal aquifer. Section 3.12 of the oCEMP states that a FWRA would be carried out prior to the start of any work associated with Project Substations. This should also apply to the BESS and National Grid Substation. Foundation Works Risk Assessments should be produced in accordance with relevant guidance including CIRIA piling and other foundation guidance and CL:AIRE Piling and Penetrative Ground Improvement Methods on Land Affected by	Following implementation of the embedded mitigation measures described above, the piling and trenchless crossings associated with the Scheme are highly unlikely to have any significant impacts on the Principal Aquifer. The Water Framework Directive Assessment [APP-163] will be updated at Deadline 1 to include reference to piling, trenchless crossings, and the embedded mitigation through the FWRA.

ID	Theme	Representation		Applicant's Response
			Contamination: Guidance on Pollution Prevention.	
EA-037	Ground Conditions	EA37 Post-consent ground investigation Document Reference(s): APP-052 Volume 1 Chapter 16 – Ground Conditions (Section 16.7.2); APP-196 Outline Construction Environmental Management Plan Tables 3.4, 3.12, 4.4, 4.12	Issue:	The CEMP commitment for a ground investigation prior to construction to inform the detailed design does not include sufficient detail.
			Impact:	Risk of pollution to groundwater.
			Solution:	Any intrusive ground investigation should be in accordance with applicable best practice guidance and legislation including BS10175:2026 and the Environment Agency's Land Contamination Risk Management guidance. The ground investigation should: assess ground conditions at the maximum design depths for pile/foundation and
				Detailed specification of the post-consent geotechnical and geoenvironmental ground investigation would be a post-consent matter, informed by the progression of the detailed design of the Scheme. The design of any ground investigation must be suitable to inform the design and will include investigation of the ground conditions to suitable depths, recovery of representative samples of the soils, groundwater and surface water (including provision of a baseline surface water dataset) and laboratory analysis that uses UKAS accredited laboratories and MCERTS approved methods where available. The investigation will be undertaken in accordance with prevailing guidance. Whilst this would be undertaken by default, the mitigation measures presented within the Outline CEMP [APP-196] and ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions

ID	Theme	Representation			Applicant's Response
				trenchless crossings; and include groundwater level monitoring sufficient to establish reasonable worst case baseline condition (i.e. including the winter period).	Assessment [APP-184] will be updated to include the requested detail at a future deadline.
EA-038	Ground Conditions	EA38 Assessment of impacts from historical sources of contamination Document Reference(s): APP-052 Volume 1 Chapter 16 – Ground Conditions (Section 16.8.9); APP-184 Phase 1 Ground Conditions Assessment (Tables 5.3, 5.5)	Issue:	The report concludes that construction phase risks for SPCs 1 to 3 are Low, and Moderate for SPC4, as determined by the Preliminary Risk Assessment (APP-184).	For Deadline 1 the text in the Outline CEMP [APP-196] Tables 3.4, 3.12, 4.4 and 4.12 in relation to FWRA will be updated to include the BESS and National Grid Substation in addition to the Project Substations. The assessment of Likely Significant Effects presented in ES Volume 1: Chapter 16 – Ground Conditions [APP-052] has been undertaken on the basis of FWRA forming part of the embedded construction phase mitigation for the National Grid Substation and BESS. The Applicant agrees that there is potential for localised point-sources such
			Impact:	Risks from SPC 2 may be underestimated.	
			Solution:	The Applicant should reassess risks from SPC 2 to sensitive water receptors.	

ID	Theme	Representation	Applicant's Response
		Additional comments: SPC 1: former RAF Hardwick SPC 2: former RAF Seething SPC 3: former Market Lane Pit SPC 4: former refuse tip The potential for contamination to be present associated with SPC 1 and SPC 2 is stated to be limited based on the features historically present, and the subsequent 50+ year period of agricultural land use. The potential for highly localised contamination sources such as burial pits cannot be wholly discounted and should be addressed. The development proposals are unlikely to result in structures penetrating through the Diamicton deposits underlying Site 3 (SPC 1). However, as Substation foundations and trenchless drilling is proposed within 300m of the former RAF Seething footprint, to depths which may penetrate the Diamicton, we consider SPC 2 to pose higher construction phase risks. Regardless, it should not be presumed that no migration pathway through Diamicton deposits would exist where these	as disposal/burial pits to be present within the former airfield. Within the Preliminary Risk Assessments presented in the ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184] the airfield fringe / runway / hardstands etc. land use within the Order Limits at SPC1 (former RAF Hardwick) and SPC2 (Former RAF Seething) have been assigned as Low, defined (in accordance with the methodology presented following scoping) as “<i>locally slightly elevated concentrations</i>”. The next stage up would be Moderate, defines as “<i>Possible widespread slightly elevated concentrations and locally elevated concentrations</i>”. It is considered that to treat the whole of the airfield within the Order Limits as Moderate on the basis of localised point sources would be over-conservative based on our understanding of the nature of this source. It is not possible to target unknown burial pits as part of the post-consent geotechnical and geoenvironmental

ID	Theme	Representation	Applicant's Response
		would not be penetrated due to the potential for local variability in permeability.	ground investigation, and if encountered during construction these would be unexpected contamination. The Outline CEMP [APP-196] requires that a protocol for dealing within any unexpected contamination will be developed by the Principal Contractor. This protocol will include: • Details of a watching brief and toolbox talks, details regarding how any affected area will be delineated, protected, investigated and assessed • The qualifications and competencies of the person appointed to oversee the works; • The preparation of a method statement for how the contamination will be dealt with or remediated (as appropriate); • An escalation policy describing when and how any notifications and approvals will be agreed with the relevant planning authority; and

ID	Theme	Representation	Applicant's Response
			Details of verification procedures for any mitigation or remediation works. The likelihood of the contaminant linkage being realised via the migration pathway through the Diamicton has been assessed as "Low" (as defined in Table 4 of Annex 1 to the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]), i.e. <i>"there is a pollution linkage and circumstances are possible under which an event could occur. However, it is by no means certain that even over a longer period such event would take place, and is less likely in the shorter-term"</i>. The next stage of likelihood, which would result in an increase to the assessed risk, is "Likely", defined as <i>"There is a pollution linkage and all the elements are present and in the right place, which means that it is probable that an event will occur. Circumstances are such that an event is not inevitable, but possible in the short-term and likely over the long-term"</i>. This is considered to over-represent the likelihood of a linkage

ID	Theme	Representation	Applicant's Response
			where “contamination associated with the historical airfield use is considered likely to be 1) limited, given that the airfield infrastructure within the Order Limits was limited to areas of runway, perimeter road, bomb and ammunition storage and hardstands, with the technical site, hangars, fuel stores at considerable distance from the Order Limits, and 2) likely to be dispersed following at least fifty years of agricultural use” and where the source significance and receptor sensitivity are unchanged. The effect of increasing likelihood has been tested. Using a the currently assigned hazard classification score of ‘Low’ and groundwater receptor sensitivity of ‘High’ (as per the risk assessment methodology in Annex 1 of Appendix 16.1) but increasing the likelihood from ‘Low’ to ‘Likely’ results in an increase of the risk from ‘Low’ to ‘Moderate’. A risk of Moderate is considered likely to be overconservative given the likely nature of the source as described above.

ID	Theme	Representation		Applicant's Response
				The effect of exposure to existing potential contamination through ground disturbance takes into account the primary and tertiary mitigation measures. These include intrusive ground investigation and assessment prior to construction, with the results of the ground investigation used to inform the detailed design of the Scheme. This increase in risk would therefore not affect the significance of the assessed effects, as the proposed approach would remain the same, with ground investigation and interpretative assessment being undertaken to refine the Conceptual Site Model, with any mitigation found to be necessary incorporated into the design of the Scheme.
EA-039	Ground Conditions	EA39 Local geology at substation locations	Issue:	The description of local geology is ambiguous. The report does not differentiate the two indicated 400kV Project Substations in the The description of the geology beneath the Project Substations in the BESS Site and Sub-Site 1B provided in Section 3.4.6 of the ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions

ID	Theme	Representation			Applicant's Response
		Document Reference(s): APP-184 Appendix 16.1 Phase 1 Ground Conditions Assessment (Section 3.4.6)		south-western part of the Order Limits	Assessment [APP-184] is considered to be suitably descriptive and aligns with published geological mapping. Section 3.4.6 of the ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184] states that " <i>the Project Substations ... within the BESS Site, Sub-Site 5A, Sub-Site 7F and Sub-Site 10C are located in areas which are underlain (beneath any superficial Diamicton) by Crag Group and subsequently, by chalk bedrock. The ... Project Substations located in Sub-Site 1B and Sub-Site 4B are located in areas which are underlain (beneath any superficial Diamicton) by chalk</i> ".
			Impact:	Risk of unexpected impacts to groundwater if the local geology is misunderstood.	
			Solution:	The ground conditions at each proposed Substation feature should be clearly defined.	
		Additional comments:	Two 400kV Project Substations are indicated in the south-western part of the Order Limits. The southern Project Substation, located adjacent to the BESS, is indicated in BGS 1:50,000 scale mapping to be located above Crag bedrock. The northern Project Substation, located adjacent to the National Grid Substation, is indicated to be located above Chalk bedrock.		
EA-040	Ecology and Biodiversity	5 Geomorphology, Fisheries and Biodiversity	Issue:	Short-Term/Temporary effects are defined as 0-2 years. This period is too long in regard to potential impacts on fish.	The Applicant notes the EA's comment and confirms that consideration has been given to the duration of construction activities affecting watercourses within the submitted assessment, including ES Volume 1, Chapter 8 – Ecology and Biodiversity
		EA40 Definition of 'short-term' effects	Impact:	A period of two consecutive years could lead to	

ID	Theme	Representation		Applicant's Response
		Document Reference(s): APP-044 ES Vol.1 Chapter 8 – Ecology and Biodiversity; paragraph 8.5.20	significant impacts to fish populations. If the impact effected spawning or juvenile fish, then this could result in two-year classes being impacted. Consequently, this could have a significant impact on fish populations, and lead to a deterioration in WFD status. Solution: Assess any activity that takes longer than 6 months as if it were permanent works and put in place mitigation against such effects.	[APP-044]. The Applicant does not agree that the six-month distinction applied within Water Framework Directive (WFD) low-risk activity screening should automatically be treated as a threshold for determining ecological significance within the Ecological Impact Assessment (EclA). The EclA has been undertaken with reference to the CIEEM Guidelines for Ecological Impact Assessment, which identify duration as one characteristic relevant to the assessment of ecological impacts, alongside other considerations including magnitude, extent, frequency, timing and reversibility. CIEEM also notes that duration should be considered in relation to ecological characteristics, such as species' lifecycles, as well as human timeframes, and that the duration of an activity may differ from the duration of the resulting ecological effect. Accordingly, duration is one factor informing the assessment of magnitude, but it is not the only consideration; professional judgement is also applied, having regard to the nature, scale, extent
		Additional comments:	Although temporary impacts for BNG are classified as those that can be restored to previous condition within 2 years, internal [EA] guidance regarding WFD for low risk activities considers short-term as being activities that are 6 months or less in duration, and where effects of those activities undertaken also last less than 6 months. Any activity/action that	

ID	Theme	Representation	Applicant's Response
		takes longer or causes an effect longer than 6 months should be assessed as if it were permanent.	and reversibility of the impact, receptor sensitivity and ecological function, including potential effects on habitat availability, fish passage, water quality and species populations. The submitted ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] applies this receptor-led approach and concludes that construction phase impacts on ditch networks would be negligible, comprising short-term reversible impacts at the Site scale with no long-term negative effect, and not significant. The Scheme incorporates substantial embedded mitigation for watercourse crossings. The Outline Cable Route Construction Statement [APP-216] identifies Hempnall Beck and the River Tas as Avoidance Areas and describes the use of trenchless crossing techniques at these locations. Launch and reception pits will be located outside Avoidance Areas and cables beneath main rivers will be installed at a minimum

ID	Theme	Representation	Applicant's Response
			depth of 5 m below the surveyed riverbed. Commitments to these measures are set out in the Outline CEMP [APP-196]. In addition, the Design Principles, Parameters and Commitments document [APP-213] outlines further mitigation whereby trenchless crossing techniques will be the default option for watercourse crossings (main river and ordinary watercourses). Where trenchless crossing techniques are not required or are demonstrated through detailed design to be unsuitable for less sensitive watercourses, crossing methods will be selected and implemented in one of the following forms (which are listed in order of least to most impact), as set out in the Design Principles, Parameters and Commitments document [APP-213]: • Single-span structures that do not interfere with the channel (banksides, bed or

ID	Theme	Representation	Applicant's Response
			water column); • Span structures with in-stream supports or pre-cast structures with natural bed; • Closed culverts with artificial invert; and • Open trench with over-pumping. Such crossings will be designed to maintain water flow, fish passage and water quality during construction, with any temporarily disturbed habitats reinstated following completion of the works. The Outline Cable Route Construction Statement identifies a hierarchy of crossing techniques that seeks to avoid or minimise interaction with watercourses wherever practicable. The Applicant anticipates that cable installation and trenchless crossing activities associated with watercourse crossings will be temporary, localised and reversible. The assessment therefore appropriately considered these effects as temporary construction impacts. The Applicant remains satisfied

ID	Theme	Representation		Applicant's Response
				that the EIA conclusions are robust and that significant effects on fish receptors are not anticipated. (ES Volume 1: Chapter 8 – Ecology and Biodiversity [APP-044]).
EA-041	Ecology and Biodiversity	EA41 Definition of fish as 'local' importance Document Reference(s): APP-044 ES Chapter 8 – Ecology and Biodiversity; Table 8.14	Issue:	Table 8.14 describes freshwater fish as being of 'Local' ecological importance, but this does not take into account the importance of the European eel. Eel are a critically endangered and priority species listed under Section 41 of the NERC Act 2006
			Impact:	The significance of impacts on protected fish species may not be adequately assessed.
			Solution:	Amend Table 8.14. Fish should be categorised as being of County importance (as defined in Table 8.4 - Geographical Scales of
				The ES assigned freshwater fish a value of Local importance (ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]). This valuation was considered appropriate on the basis of the baseline information available, including the habitat-led assessment presented in ES Volume 3, Appendix 8.9 Aquatic Habitat Assessment Report [APP-160] , and the ecological evaluation presented in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] . The ES identifies that no fish records were identified within the survey areas, although hydrologically connected monitoring sites recorded typical lowland river species, including European eel, within connected reaches of the River Tas and Hempnall Beck. It also states that fish are likely to be present in the main connected channels, but that ephemeral ditches within the Order

ID	Theme	Representation			Applicant's Response
				Reference in relation to ecological receptors)	Limits are unlikely to support significant populations and only on a temporary basis. On this basis, and having regard to the widespread distribution of these species within the Yare and Tas catchment, the ecological importance of freshwater fish in relation to the Order Limits was assessed as Local. The Applicant recognises the Environment Agency's position regarding European eel (<i>Anguilla anguilla</i>), including that the species is listed as a Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006. The CIEEM Guidelines for Ecological Impact Assessment identify species of principal importance as an objective starting point for identifying important ecological features; however, they also state that the importance of species populations should be determined with reference to contextual information on distribution and abundance, including trends based on historical records. The Applicant therefore considers that the valuation applied within the ES remains

ID	Theme	Representation			Applicant's Response
					appropriate, as the assessment considered the available evidence for the fish assemblage and its likely use of watercourses within the Order Limits, rather than species conservation status alone. Notwithstanding this, if the Environment Agency's more precautionary position were adopted and freshwater fish were considered to be of up to County importance for the purposes of sensitivity testing, the assessment methodology would remain unchanged. On that basis, operational EMF effect on freshwater fish would be revised to Minor Adverse. However, the effect would remain below the threshold for a Significant Effect in EIA terms and the overall conclusions of the Environmental Statement would remain unchanged. Accordingly, the Applicant does not consider that an amendment to the receptor valuation is necessary. Even if a more precautionary receptor valuation were applied, the predicted effects would remain not significant and no changes to

ID	Theme	Representation			Applicant's Response
					the mitigation strategy or overall assessment conclusions are required.
EA-042	Ecology and Biodiversity	EA42 Impacts of electro-magnetic fields (<i>EMF</i>) on eel Document Reference(s): APP-044 ES Chapter 8 – Ecology and Biodiversity; paragraph 8.9.481	Issue:	We do not agree with the stated conclusion that operational EMFs from the proposed development are not expected to give rise to any ecologically significant effects on freshwater fish.	The ES assessment considered the potential operational effects of Electromagnetic Fields (EMF) from underground electrical cables on freshwater fish receptors, including European eel, and concluded that significant effects are not anticipated. The assessment was undertaken taking account of embedded mitigation secured through the Scheme design. Trenchless crossing techniques will be the default option for watercourse crossings (main river and ordinary watercourses) with cable burial depths to be set at a minimum of 5m below the surveyed riverbed of main rivers, as stated in the Design Principles, Parameters and Commitments [APP-213] . In more ecologically sensitive areas for aquatic receptors, Hempnall Beck and River Tas crossings are identified as Avoidance Areas and will be crossed using trenchless techniques with launch
			Impact:	There is a risk that residual magnetic fields from buried cables may be strong enough to impact on European eel behaviour.	
			Solution:	Provide reassurance that the proposed cable burial depth will ensure that magnetic field strength is reduced to below 12 microtesla at the bed of the watercourse, thereby adopting a precautionary approach to avoid potential impacts on European eel.	
		Additional comments:	There is evidence that Anguillid species can detect magnetic fields as		

ID	Theme	Representation	Applicant's Response
		low as 12microtesla. The applicant has indicated that magnetic field strength will be approximately 95microtesla at 1 m above ground and recognises that this strength attenuates rapidly with distance.	and reception pits located outside of the Avoidance Areas as set out in the Outline CEMP [APP-196]. These measures provide substantial physical separation between the cables and aquatic receptors and form embedded mitigation within the Scheme design. The Applicant further notes that, in relation to another nationally significant solar infrastructure project, the Environment Agency advised that a cable depth of 5 m beneath watercourses where HDD is utilised would be sufficient to mitigate EMF effects on fish receptors. The Scheme adopts the same minimum burial depth beneath main rivers. [Planning Inspectorate Reference: EN010168 - APP/6.1 Lime Down Solar Park Environmental Statement Volume 1, Chapter 9: Ecology and Biodiversity]. The Applicant therefore considers that the embedded mitigation secured through the Scheme design provides an appropriate level of protection for fish

ID	Theme	Representation	Applicant's Response		
					receptors, including European eel. The ES concluded that operational EMF effects on freshwater fish would not be significant and the Applicant remains satisfied that this conclusion is robust.
EA-043	Ecology and Biodiversity	EA43 Riparian enhancement and Biodiversity Net Gain Document Reference(s) APP-199 Outline Landscape and Ecology Management Plan (oLEMP) APP-218 Biodiversity Net Gain Report section 4.3	Issue:	The oLEMP does not include reference to the riparian enhancements and reduced encroachment that are specified within the BNG report.	The areas referred to by the Environment Agency are associated primarily with temporary construction activities within the Cable Route Corridor rather than permanent operational development. The principal crossing of Hempnall Beck occurs within the Cable Route Corridor and is subject to embedded mitigation, including the use of trenchless crossing techniques and reinstatement following construction. The Avoidance Areas are secured through the Outline CEMP [APP-196] . The assessment identified no significant residual effects on aquatic ecology that would require compensatory riparian habitat enhancement. The mitigation approach adopted within the ES is therefore focused on avoiding, minimising and reinstating temporary construction effects rather than offsetting permanent losses of riparian habitat ES
			Impact:	Management or enhancement opportunities for riparian habitats may be overlooked. For example, addressing extensive invasive species issues (Himalayan balsam) which is acknowledged to contribute to poor condition of Hempnall Brook.	
			Solution:	Secure riparian habitat enhancements in the oLEMP, in line with the commitments made in the BNG report. Include explicit	

ID	Theme	Representation			Applicant's Response
				measures to check for and manage invasive species.	Volume 3: Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160], Biodiversity Net Gain Report [APP-218]. The Scheme already incorporates a range of measures relevant to aquatic habitats, including minimum stand-off distances from watercourses, trenchless crossings at watercourses, habitat reinstatement, and ecological management measures secured through the Outline CEMP [APP-196] and Outline LEMP [APP-199]. With regard to INNS, the Applicant confirms that appropriate construction management and biosecurity measures will be implemented during construction to prevent the spread of invasive species. Such measures form part of the wider environmental management framework secured through the DCO application documents. The Applicant therefore does not consider that additional riparian enhancement measures are necessary

ID	Theme	Representation			Applicant's Response
					to mitigate a significant aquatic ecology effect arising from the Scheme.
EA-044	Ecology and Biodiversity	EA44 Impact of solar panels on aquatic invertebrates Document Reference(s): APP-044 ES Chapter 8 – Ecology and Biodiversity; paragraph 8.9.481	Issue:	The potential for aquatic invertebrates to be attracted to solar panels has not been addressed.	Operational effects associated with solar infrastructure were considered within the ES and the assessment concluded that effects on aquatic invertebrates would be negligible and not significant. Embedded mitigation measures are secured through the Scheme design, including minimum stand-off distances between solar infrastructure and aquatic habitats. The Design Principles, Parameters and Commitments [APP-213] secures a minimum offset of 10 m between Solar PV Modules and all watercourses (including IDB drains). Larger offsets are also secured in relation to designated ecological features (see Table 4.1 of the DPPC). These are also secured through the Works Plan Part 1 and 2 [AS-002 and AS-003] . Undeveloped buffer zones adjacent to watercourses will be retained for the lifetime of the Scheme, maintaining physical separation between operational infrastructure and aquatic habitats.
			Impact:	Risk of interrupted lifecycle of aquatic invertebrates.	
			Solution:	It is acknowledged that the outline masterplan does not appear to have solar modules in close proximity to the watercourse, but these wider buffers do not	

ID	Theme	Representation		Applicant's Response
			appear to be secured (noting the commitment to only 10m stand off from watercourses within appendix 7.78 Design Principles, Parameters and Commitments). Secure wider buffers to watercourses potentially supporting diverse invertebrate communities within oLEMP and Appendix 7.78.	The Scheme also incorporates embedded measures specifically intended to reduce reflective effects from solar infrastructure. As described within the ES, PV panels will incorporate anti-reflective coatings designed to maximise absorption of solar radiation and minimise reflection. Panels will be dark coloured (black or dark blue) and mounting structures will have a rough matt finish. The solar arrays will comprise individual panel rows with separation distances between modules and rows, rather than forming a continuous reflective surface. Retained vegetation, undeveloped buffer zones and stand-off distances from watercourses provide additional screening and physical separation between panel arrays and aquatic habitats. The Applicant acknowledges that scientific literature identifies the potential for some aquatic macroinvertebrates to respond to reflective surfaces. This potential pathway was considered within the assessment. The ES concluded that
		Additional comments:	The aquatic ecology report identified that Hempnall Beck could support diverse invertebrate communities. There is evidence that aquatic invertebrates are attracted to horizontally polarised light (as reflected from water bodies and solar panels) and that they use this as stimulus to induce egg laying.	

ID	Theme	Representation		Applicant's Response
				any glint or glare reaching adjacent watercourses would be intermittent and transient, dependent upon solar angle, and further attenuated by intervening vegetation and surface water movement. The assessment also concluded that there is no established evidence that such reflection results in measurable effects on benthic invertebrate assemblages. Taking account of the embedded mitigation secured through the Scheme design, including reduced panel reflectivity, retained watercourse buffers, intervening vegetation and a minimum 10 m stand-off from watercourses, the Applicant remains satisfied that the assessment is robust and that significant effects on aquatic invertebrate populations are not anticipated.
EA-045	Scheme Description	Document Reference(s): APP-039 Volume 1 Chapter 3 – Order Limits Error: There is an inconsistent approach to the listing of active and historic landfills within 1km of the Order Limits. Some landfills		The Applicant notes that there is an inconsistent approach used within paragraph 3.4.22 within ES Volume 1, Chapter 3 - Order Limits [APP-039]. Section 2.4 of ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment [APP-184 to APP-186]

ID	Theme	Representation	Applicant's Response
		are listed multiple times, sometimes with different names or no name provided, and it is not always clear whether a referenced landfill is historic or authorised. Howe Pits is included in the list but is situated over 1km from the Order Limits.	defines the landfills and areas of infilled land within the Order Limits and surrounding area, and these have been considered appropriately within the effects assessed within ES Volume 1, Chapter 16 – Ground Conditions [APP-052] .
EA-046	Water Environment – Water Framework Directive	Document Reference(s): APP-045 Volume 1 Chapter 9 – Water Environment, Appendix 9.2 Water Framework Directive Assessment Error: The WFD Groundwater body present beneath the site, 'Broadland Rivers Chalk and Crag Water Body', is described as being classified as 'Poor' ecological status. This is incorrect as Ecological status is not used to classify groundwater bodies. The overall classification of WFD Groundwater bodies is based on the lower of two categories – chemical status and quantity.	The Applicant notes this comment. Considering the chemical status and quantity, the Broadland Rivers Chalk and Crag Water Body is classified as 'Poor', therefore this does not change the conclusions presented within the Water Framework Directive Assessment (APP-163) .
EA-047	Ground Conditions	Document Reference(s): APP-052 Volume 1 Chapter 16 – Ground Conditions Table 16.7 Error:	This error is acknowledged and it is agreed that the bedrock aquifers should be classified as Principal Aquifers. It is noted that the Assessment of Likely Effects uses a receptor sensitivity of Very High – appropriate for the Principal

ID	Theme	Representation	Applicant's Response
		All bedrock lithologies are described as Secondary (undifferentiated) aquifers, creating the risk that the significance and sensitivity of the bedrock aquifers underlying the site are under-represented. The bedrock lithologies should be identified as Principal aquifer. However, this error has not been carried through in the Phase 1 Preliminary Risk Assessment.	Aquifers and hydrogeological baseline and therefore correction of this error will not result in a change to the significance of the identified effects. This error will be corrected at a later deadline.
EA-048	Ground Conditions	Document Reference(s): APP-052 Chapter 16 Ground Conditions, APP-184 Phase 1 Ground Conditions Assessment Error: APP-052 Tables 16.5 and 16.6 and APP-184 Table 3.1 present a summary of superficial geology present on the site. This does not identify the presence of Alluvium within Sub-Site 8B, as is indicated on British Geological Survey mapping.	This omission of the very limited area of Alluvium within the south-western corner of Sub-Site 8B from Table 16.5 of ES Volume 1: Chapter 16 – Ground Conditions [APP-052] is acknowledged. The Assessment of Likely Effects uses a receptor sensitivity of Very High (based on the Principal bedrock aquifer). The Alluvium is classified as a Secondary A Aquifer (Medium sensitivity). The bedrock Principal aquifer remains the critical receptor, and the assessment presents a reasonable worst-case basis. Were the assessment to be amended to reflect the lower sensitivity of the Alluvium (Secondary A Aquifer), the significance of the assessed effects would not be more adverse than currently assessed.

ID	Theme	Representation	Applicant's Response
EA-049	Management Plans	Document Reference(s): APP-196 Outline Construction Environmental Management Plan Error: Table 4.4 states that "A Foundation Works Risk Assessment will be completed prior to the start of any work associated with the foundations of the Project Substations, supported by the Ground Investigation data." This should refer to the National Grid Substation. Error: Table 4.12 states that "A Foundation Works Risk Assessment will be undertaken post-consent for structures requiring deep foundations and/or piling such as the Project Substations." This should refer to the National Grid Substation. Possible error: Table 4.18 states that "The relevant risk assessments for safety during construction will be required and produced by the Contractor prior to decommissioning, which will be implemented to minimise the risk of accidents and disasters." We presume the reference to decommissioning is an error	The Applicant notes that the Outline CEMP [APP-196] references 'Project Substations' within tables 3.4, 3.12, 4.4 and 4.12. The intention was for this to include the National Grid Substation and BESS. The assessment of Likely Significant Effects presented in ES Volume 1: Chapter 16 – Ground Conditions [APP-052] has been undertaken on the basis of FWRA forming part of the embedded construction phase mitigation for the National Grid Substation and BESS. The Outline CEMP [APP-196] will be updated for Deadline 1 to confirm inclusion of the National Grid Substation and BESS within tables 3.4, 3.12, 4.4 and 4.12. The Applicant notes that the table 4.18 within the Outline CEMP [APP-196] references 'decommissioning', this table will be updated for Deadline 1 to instead reference 'construction'.
EA-050	Ground Conditions	Document Reference(s): APP-052 Chapter 16 Ground Conditions Section 16.7.2	This error is noted and should state " <i>The peat is considered likely to be in hydraulic continuity with the underlying</i>

ID	Theme	Representation	Applicant's Response
		Error: Probable typographical error: "The peat is considered likely to be in continuity with the peat..."	<i>Alluvium and Leet Hill Sand and Gravel Member</i> ".
EA-051	Decommissioning	Document Reference(s): APP-198 Outline Decommissioning Environmental Management Plan Error: Table 5.4 and Table 5.12 refer to the use of an Emergency Response Plan and other pollution avoidance measures for decommissioning of the National Grid Substation and Grid Connection infrastructure. However, the National Grid Substation and Grid Connection Infrastructure are understood to be intended to remain in situ and presumably not subject to decommissioning activities.	Paragraph 3.1.6 of the Outline DEMP appropriately confirms that the National Grid Substation and the Grid Connection Infrastructure would remain in situ. Any measures included within Tables 5.1 to 5.18 summarise the mitigation measures to be included within the DEMP that will be relevant to the National Grid Substation and the Grid Connection Infrastructure during the decommissioning phase. The measures are not included to suggest that they will apply to the decommissioning of that infrastructure itself.
EA-052	Water Environment	Document Reference(s): APP-045 Volume 1 Chapter 9 – Water Environment Error: Table 9.3 showing the sensitivity criteria of identified receptors does not include Groundwater Dependent Terrestrial Ecosystems (GWDTEs). GWDTEs are subsequently listed in Table 9.4 as 'High' sensitivity receptors. Note that Appendix 16.1 – Phase 1 Ground	The Applicant notes that Groundwater Dependent Terrestrial Ecosystems (GWDTE) are missing from ES Volume 1, Chapter 9 – Water Environment [APP-045] Table 9.3, however, they have been identified as a receptor and the omission does not alter the assessment of effects. It is therefore not proposed to update the chapter.

ID	Theme	Representation	Applicant's Response
		Conditions Assessment identifies and assesses GWDTEs within the Study Area. We consider Fritton Grange Meadows should also be assessed as a potential GWDTE.	
EA-053	Ground Conditions Water Environment	<u>Informative: Karstic features in chalk bedrock</u> The Western part of the Proposed Development is underlain by Chalk bedrock (Lewes Nodular Chalk Formation, Seaford Chalk Formation, Newhaven Chalk Formation, Culver Chalk Formation and Portsdown Chalk Formation (Undifferentiated)). British Geological Survey (BGS) Karst Report Series C3: Karst in the Chalk of East Anglia (Karst report series - BGS Groundwater) indicates that some Karstic or other solution features (dissolution pipes and dolines) have been identified approximately 5km to the north-west of the Proposed Development area (Figure 20, Surface depressions and dissolution pipes in the north of East Anglia). The high flow rate in these features can be vastly different to the average surrounding rocks. Therefore, these natural features can act as rapid pathways for any pollutants or for escape of pumped concrete. Piling, other foundations, or other penetrative works at depth works that could disrupt groundwater flow may result in reactivation of previously dormant features. As such any Piling Risk Assessment or Foundation Works Risk Assessment, Construction Environmental Management Plan or other assessment and plans relating to ground conditions and sub surface water environment, should	The Applicant notes this informative. The hydrogeology of the chalk aquifer will be considered as part of post-consent interpretative assessments, such as FWRA, Hydrogeological Risk Assessment and Generic Quantitative Risk Assessments.

ID	Theme	Representation	Applicant's Response
		include methods and mitigations that minimise risks from interactions with these features, especially in areas of heightened groundwater sensitivity i.e. Source Protection Zones, Springs, Groundwater Dependent Terrestrial Ecosystems.	
EA-054	Water Environment	<u>Informative: Sustainable Drainage Systems (SuDS)</u> The report states in Table 9.2 that “Infiltration testing is to be undertaken postconsent in appropriate locations (once inverter locations are finalised) to confirm rates for inverter drainage systems.” Section 3.2.1 of BRE Digest 365 – ‘Soakaway Design’ states “The soakaway should not connect a contamination source to a groundwater target, i.e. creating a source-pathway-receptor linkage...prior to designing the soakaway, the potential for contamination on the site needs to be established. Where necessary, remedial measures should be undertaken.” Be aware that the ground conditions may not be suitable for carrying out soakaway testing in areas with potential historic contamination. The following points should be considered: 1. Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment.	The Applicant notes this informative.

ID	Theme	Representation	Applicant's Response
		2. Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. They would only be acceptable if a phased site investigation showed the presence of no significant contamination. 3. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters. 4. The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. 5. Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction). 6. SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual (CIRIA C753, 2015), National standards for sustainable drainage systems (SuDS) - GOV.UK and the Susdrain website. 7. For further information on our requirements with regard to SuDS see our Groundwater protection position	

ID	Theme	Representation	Applicant's Response
		statements (2018), in particular Position Statements G1 and G9 – G13 available at: https://www.gov.uk/government/publications/groundwater-protectionposition-statements	
EA-055	Ground Conditions Water Environment	<u>Informative: Composition of drilling fluids</u> Drilling fluids will include Bore-Gel (or similar) and EZ Mud (or similar). At detailed design stage the Applicant should provide MSDS/COSHH information to confirm that the selected drilling fluids do not contain PFAS-coated bentonite. Environmental permitting may be required where drilling lubricants or additives (e.g. as part of bentonite drilling mud) are used, if they are considered Groundwater Activities. This may be exempt if they are of extremely low risk (see section 2 of Groundwater activity exclusions from environmental permits - GOV.UK). Any introduction of substances likely to cause pollutions (hazardous substances or non-hazardous pollutants) will require assessment as to whether this will need permitting unless demonstrated to be excluded under Sch. 22 para. 3(3)(b) of the Environmental Permitting Regulations (England and Wales) 2016. Details on the chemical constituents (including CAS numbers) of the cited drilling fluids in the Outline Cable Route Construction Statement paragraph 2.6.3 will require assessment of their status as a hazardous substance or non-hazardous pollutant. These can be cross-referenced with the JAGDAG list which can be accessed through this page: Hazardous substances	The Applicant notes this informative. The exact drilling fluid products to be used will also be confirmed in the detailed CEMP, and Safety Data Sheets (SDSs) will be provided to the Environment Agency for approval prior to commencement of drilling works. Where feasible, the Applicant will seek to avoid the use of PFAS-containing bentonite, polymers, fuels, oils or other chemicals, and any proposed substitute products ('or similar') will be subject to review by the Environment Agency through prior submission of SDSs. These commitments ensure that drilling fluids will be appropriately selected, controlled, and monitored, and that groundwater and ecological receptors will be protected throughout the construction phase.

ID	Theme	Representation	Applicant's Response
		to groundwater: minimum reporting values - GOV.UK . It is understood the final drilling methodology may not have been decided, but the use of additives in drilling fluids needs to be considered at this early stage for potential future assessment for risks to groundwater.	
EA-056	Ground Conditions	<u>Informative: Fire Suppressant Chemicals</u> Details of proposed fire suppressant chemicals, if proposed, are to be determined. If fire suppressant systems contain polluting or hazardous chemicals these could potentially impact groundwater quality if discharged to ground. Details of fire suppressant chemicals will need to be provided in the detailed BSMP. Any fire suppressant system selected should preferably pose no harm to human health or the environment. The physicochemical properties of the selected suppressant should be confirmed via supporting documentation such as Material Data Safety Sheets	Section 5.1.8 of the Outline BSMP [APP-200] already confirms that: <i>'The detailed design stage will determine the approach to addressing the following specific requirements, which will be updated prior to construction of the BESS and submitted to the relevant planning authority as a detailed BSMP prior to the commencement of construction of the BESS. The BSMP must include:</i> <i>• A statement on the battery system specifications, including fire detection and suppression systems;</i> <i>• A statement on the overall compliance of the system with applicable legislation;</i> <i>• An environmental risk assessment to ensure that the potential for indirect risks (e.g., through</i>

ID	Theme	Representation	Applicant's Response
			<i>leakage or other emissions) is understood and mitigated'</i> The Applicant confirms that fire suppression systems considered for the Scheme will not integrate suppression agents containing PFAS.
EA-057	Water Environment	<u>Informative: Assessing Thermal Effects from Buried Cables</u> Following the 2023 amendments to the Environmental Permitting Regulations 2016 heat is now a groundwater pollutant. Discharge of heat to water should be a material consideration for developments involving emissions of heat. For example, buried electrical cables, particularly in NSIPs or large-scale infrastructure developments. To date heat input to ground has been considered lower risk to groundwater, on the understanding it readily disperses in the surface layers and air and in general does not have any widespread adverse impacts on the ground and groundwater. However, in very sensitive locations, we may want to regulate higher risk activities to prevent deterioration of the groundwater quality. The Environment Agency is currently developing guidance about heat as a pollutant to groundwater and to date has published a regulatory position statement, guidance on the	The Applicant notes this informative.

ID	Theme	Representation	Applicant's Response
		exemptions, and a permitting regime for open and closed loop ground source heating a cooling systems (GSHCs). The guidance will draw upon the Environment Agency's Chief Scientist's Group published report for Ground Source Heating and Cooling (GSHC) systems. This report examines the potential for ground source heating and cooling systems to change the temperature in the ground and identifies receptors that could be impacted. Permitting implications Cables Heat is a pollutant, so discharges that might lead to an input of heat into groundwater are groundwater activities. Groundwater activities are defined in section 3.34 pp20 of Defra's Environmental permitting: Core guidance. However, we take a proportionate and pragmatic approach in our application of the principles of the Environmental Permitting Regulations. Requiring a permit would feel disproportionate for many activities at or near the ground surface. Accountability to comply with extant environmental legislation lies with the developer and the landowner. They should consider the thermal implications of developments which emit	

ID	Theme	Representation	Applicant's Response
		heat such as buried electricity cables, and the potential risks to the water environment via a desk-based assessment, as a minimum. Desk-based risk assessment Currently, the main driver for the prevention of heat pollution is to protect surface water ecology, protected sites and ancient woodlands. Heat should also not impact quality or quantity of water in existing groundwater or surface water abstractions. In the first instance the developer should ensure that where practicable the proposed cabling: • is fully sealed • does not discharge pollutants other than transfers heat to the environment • does not cause pollution of surface water or groundwater • is not within a groundwater source protection zone 1 (SPZ1) that's used to supply water for domestic or food production purposes • is not within 50m of a well, spring or borehole used to supply water for domestic or food production purposes • installation does not mobilise any contaminants present in the subsurface to the extent that the pollution of groundwater occurs	

ID	Theme	Representation	Applicant's Response
		is not adjacent to a septic tank or cesspit, including the infiltration system Desk based assessments at the planning stage should scope in heat from electricity cables. The GSHC exemption criteria and resources referenced in this document could help assess the risk. For example: either by de-risking, if all criteria are met or further assess the risk, where the criteria are not met and mitigate the risk, where required. In other words, sections of the cabling route that meet all of these criteria, and where the developer is satisfied that the cables will not cause harm via discharge of heat and heat pollution, can be scoped out from requiring further risk assessment. You do not need to complete any further assessments or apply for a permit if your cabling route meets all the exemption conditions. If cabling sections require further assessment following application of these exemptions, a conceptual site model should be produced. We ask for the model to demonstrate the proposed installation depth, anticipated depth to groundwater, and specification of the cable installation, including thermal insulation measures. An understanding of the expected normal and maximum operating temperature of the cables, and the depth of any nearby abstraction boreholes will be useful in determining risk.	

ID	Theme	Representation	Applicant's Response
		In those rare instances where we are concerned that there are risks which require ongoing control or management, you may require a groundwater activity under schedule 22 of the Environmental Permitting Regulations (EPR) 2016.	
EA-058	Ecology and Biodiversity	Fisheries and Biodiversity Document Reference(s): APP-160 Appendix 8.9: Aquatic Habitat Assessment Report; Error: Table 2.1 mentions coarse fish, eel and lamprey, but does not include specific reference to habitat usage by salmonid fish species. Salmonids spawn in gravel, seek cover in marginal features and woody material, and could be impacted by artificial structures. We accept that the habitat features used by salmonids are already identified as of importance for other fish species, but we consider that salmonids should be specifically included.	The Applicant notes the Environment Agency's comment. The habitat descriptions presented within Table 2.1 are based on habitat categories defined within the River Habitat Survey methodology and were not intended to provide an exhaustive list of species-specific habitat requirements. The Applicant acknowledges that salmonid species utilise habitat features including clean gravel substrates for spawning/ incubation/emergence, together with marginal cover, woody material and other instream features during different life stages. However, these habitat attributes were already captured within the habitat assessment and considered within the assessment of fish receptors. The Environment Agency's comment also recognises that the habitat features used by salmonids

ID	Theme	Representation	Applicant's Response
			are already identified as being of importance for other fish species. Accordingly, the Applicant does not consider that the absence of a specific reference to salmonid habitat use within Table 2.1 represents an omission from the scope of the assessment. Table 2.1 was intended to describe habitat types and their potential ecological function, rather than to provide a complete species-by-species account of habitat requirements. The relevant habitat features used by salmonid species, including gravel substrates, marginal cover, woody material and instream structural features, were recorded through the aquatic habitat assessment and considered within the assessment of fish receptors. No amendment to Table 2.1 is therefore considered necessary. This does not alter the assessment findings, receptor valuation or conclusions presented within the Environmental Statement.
EA-059	Ecology and Biodiversity	Document Reference(s): APP-044 ES Chapter 8 – Ecology and Biodiversity; Table 8.4	The Applicant notes the Environment Agency's comment and agrees that the

ID	Theme	Representation	Applicant's Response
		Error: Table 8.4 refers to priority species under NERC Act. Priority species are not listed under Section 31 as stated, but under Section 41. This needs to be amended.	Section 31 reference within Table 8.4 is incorrect. This is a typographical error only and does not affect the assessment methodology, receptor valuation, impact assessment or conclusions presented within the Environmental Statement.

2.3 General Aviation Awareness Council

Table 2.3 Applicant's Response to the General Aviation Awareness Council [[RR-0664](#)]

ID	Theme	Representation	Applicant's Response
GAAC-001	Aviation	The GAAC has monitored this scheme since the consultation in October 2024. The GAAC has urged East Pye to address aviation safety, in line with Government policy but this has not been done. The promoter has not engaged with the Norfolk Gliding Club, the operator of Tibenham Aerodrome. EPS has never contacted the Aerodrome. The only contact (at the instigation of the Aerodrome) has been with Pager Power that has advised EPS on 'Glint and Glare' but no site-specific appraisal has been undertaken.	The Applicant acknowledges the GAAC's response on behalf of the Norfolk Gliding Club. The Applicant has engaged with Norfolk Gliding Club (NGC) as set out at Table 18.6 of ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054], to understand the specific operations and request information from NGC to inform technical assessments presented in ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [APP-189-193] and the High Level Investigative Report [APP-222]. The assessments have been undertaken in accordance with the available guidance, industry best practices, an assessment methodology employed on other NSIP and DCOs, as well as information provided by Norfolk Gliding Club. The determined impact upon Norfolk Gliding Club activities are based on geometric modelling results, recognised assessment methodologies, established aviation guidance, and professional judgement.

ID	Theme	Representation	Applicant's Response
GAAC-002	Aviation	The Aerodrome Operator is the body responsible for the safety of those using the aerodrome. Its submissions and requests have not had appropriate and / or adequate response.	The Applicant has considered information informed by the operators (Norfolk Gliding Club) of the aerodrome (Tibenham Airfield) to undertake technical assessments within ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [APP-189] to [APP-193] and the High Level Investigative Report [APP-222] . The technical assessments conclude that mitigation as suggested by the aerodrome operator is not required, due to a significant impact not being predicted.
GAAC-003	Aviation	The Civil Aviation Authority guidance to prospective developers has been ignored. The GAAC has also urged the promoter to address the potential impacts on Tibenham Aerodrome and its users in its Environmental Impact Assessment but this has not been done.	The Applicant has considered applicable guidance outlined by numerous safeguarding bodies, including the Civil Aviation Authority, to undertake technical assessments within ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [APP-189] to [APP-193] and the High Level Investigative Report [APP-222] . The specific guidance is outlined within the appendices.
GAAC-004		The EIA should have addressed human safety as well as impacts on the recreational importance and value of Tibenham Aerodrome, including its designation as a Nationally Significant Area for Sport (SASP).	The Applicant has considered topics within the EIA that have potential for likely significant environmental effects, and the scope of topics to be assessed within the ES were agreed through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]).

ID	Theme	Representation	Applicant's Response
			The impacts of glint and glare on Aviation activity have been assessed within ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [APP-189] to [APP-193] and impacts on aviation activity associated with Norfolk Gliding Club at Tibenham Airfield have been assessed within the High Level Investigative Report [APP-222] . The assessments conclude that, with the embedded design measures and proposed mitigation, the Scheme would not give rise to significant aviation effects.
GAAC-005	Aviation Socio-Economics	The socio-economic value of the Aerodrome and the impact of the proposed scheme should also have been addressed.	As noted in GAAC-004, the High Level Investigative Report [APP-222] has concluded that the Scheme will not give rise to significant aviation effects and in turn would not be expected to significantly affect the socio-economic value of the aerodrome.
GAAC-006	Aviation	The provisions of NPS EN-1 and the National Planning Policy Framework have not been followed. The GAAC will fully address these issues in the next stages of the DCO Examination	The Applicant draws attention to the Planning Statement [APP-209] and Policy Compliance Document [APP-210] , which set out how the Scheme has been developed in accordance with the provisions of NPS EN-1.

2.4 Historic England

Table 2.4 Applicant's Response to Historic England [\[RR-0769\]](#)

ID	Theme	Representation	Applicant's Response
HE-001	General remarks	We summarise our representation regarding this proposed projects as follows: 1) General comments The project lies in an extensive area of South Norfolk with some important but localised heritage assets. Much of the area has been predominantly agricultural in nature. The list of heritage assets reflects this rural character, with the predominance of important rural churches, listed buildings and small conservation areas focused on areas of medieval settlement. Based on the available information the applicant has provided an appropriate assessment of the location, type and significance of designated and non-designated heritage assets. Heritage receptors have therefore been considered in the design of the scheme,	The Applicant welcomes the confirmation from Historic England that the applicant has provided an appropriate assessment. In respect of Tasway Energy Park, the applicant has assessed all cumulative 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 East Pye

ID	Theme	Representation	Applicant's Response
		and a robust approach to mitigation has been proposed. The cumulative impact of the scheme in conjunction with the adjacent 'Tasway Energy Park' scheme and associated BESS projects has been identified as a potential area of concern. We will make further comments in the Written Representation.	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 Applicant welcomes future engagement with Historic England.
HE-002	Cultural Heritage	2) Impacts on designated and non - designated heritage assets Our primary consideration in relation to this scheme is the impact of the proposal on the significance of the designated heritage assets, both within the Order limits and in its vicinity. We will therefore provide further comment upon the impact of the proposed project on the significance of these assets and in relation to the setting of the proposal. The applicant has confirmed the preferred location for the BESS (with 400kV substation) (Site1) and National Grid Substation (Site 1); we broadly support the approach to the siting of	The Applicant notes Historic England's comments and welcomes the broad support for the siting of the BESS (with 400kV Substation) and National Grid Substation within Site 1.

ID	Theme	Representation	Applicant's Response
		these elements of the development. We will comment on the methodologies and mitigation strategy of the proposed Cable Route Corridor (CRC) as this is likely to be an area of concern.	
HE-003	Cultural Heritage	As certain areas within Order limits have not been fully assessed through archaeological evaluation, there is still potential that previously unknown archaeological sites which are of equivalent value to a designated heritage asset could be identified. The DCO would need to contain provisions for further evaluation prior to commencement of the development, revision of assessment of impact, and proportionate mitigation as necessary. We will provide further comments on this matter in our written representation.	The Applicant notes that the various below-ground impacts of the Scheme have been discussed with NCCHEs and have been used to inform ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [APP-173]. In consultation with NCCHEs, the Archaeological Mitigation Strategy has been designed to have flexibility to allow for appropriate archaeological mitigation once full details of the Scheme impacts are known. This will ensure mitigation in proportion to the significance of archaeological remains present. Requirement 12 of the Draft DCO [AS-032] requires that no development is to be commenced until a programme of archaeological investigation has been carried out in accordance with the archaeological mitigation strategy.
HE-004	Cultural Heritage	Regarding the historic built environment our main concerns relate to the impact upon the setting of the following heritage assets: one Scheduled Monument, two Grade I Listed Buildings, two Grade II*	The Applicant acknowledges that Historic England will be commenting upon impacts to the settings of Scheduled Monuments, Grade I and II* Listed Buildings, and Conservation Areas.

ID	Theme	Representation	Applicant's Response
		Listed Buildings, 42 Grade II Listed Buildings and four Conservation Areas. We will comment on the Scheduled Monument, Grade I and Grade II* listed buildings and Conservation Areas in greater detail in our formal written representation.	
HE-005	Cultural Heritage	Historic England recognises that as a result of this project there are going to be changes to the setting of designated heritage assets. In some cases, these changes would result in a significant effect. This is likely to equate to harm to the significance of these assets in Policy terms. We understand the implementation of the proposed mitigation would be likely to reduce the level of impact and therefore heritage harm, however residual effects are likely to remain. We are keen to ensure that adequate mitigation to reduce impacts is appropriately secured in the DCO and accompanying documents, so magnitude of impacts to the designated heritage assets is minimised.	The Applicant requests clarity on whether the Consultee has identified significant effects before or after embedded and proposed mitigation strategies have been implemented. In ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], it is concluded that with embedded mitigation in place, during the Construction Phase there would be a neutral effect, which is not significant, and during the Operational Phase, there would be a neutral – minor adverse effect to some designated heritage assets, which is also considered to be not significant. During the Decommissioning Phase, any effects would be reduced back to neutral. Following the adoption of embedded and additional mitigation measures, it was concluded that the residual effects for the majority of designated heritage assets would be a neutral effect, which is not significant. For the Listed Moulton Farmhouse,

ID	Theme	Representation	Applicant's Response
			it was concluded that there would be a low-negligible impact upon this asset, which would result in a minor adverse effect, but which is considered to be not significant. As Moulton Farmhouse is Grade II Listed, HE, as stated in HE 004, will not be commenting on this asset, and will be leaving discussion of impacts of Grade II Listed Buildings to the LPA.
HE-006	Cultural Heritage Landscape and Visual	We recognise the applicant has provided visualisations and LVIA specific to the historic environment. We are looking to ensure the information provided in the ES is consistent with what we have previously discussed and is appropriate for the purposes of the examination. Further advice will therefore be offered through our Written Representation in relation to the designated heritage assets affected by the scheme, and on the proposed mitigation and enhancements measures.	Heritage specific viewpoints are addressed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]. Photomontages are included as an Annex to ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168], with additional viewpoints also included within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. A virtual meeting between the parties was conducted October 2025 to discuss the proposed heritage specific view locations. Following the meeting, the Applicant provided Historic England with a plan showing these locations.
HE-007	Cultural Heritage	We are also aware the development will result in a range of potentially significant impacts on non-designated heritage assets and archaeological sites. We will	The Applicant notes this comment.

ID	Theme	Representation	Applicant's Response
		not be commenting on this matter in detail and will defer to the LPA and their expert and specialist advisors.	
HE-008	Draft DCO Cultural Heritage	3) Development Consent Order We note a Draft Development Consent Order have been provided (Draft Development Consent Order [APP-017]). We will therefore be providing comments and recommendations on the DCO wording, specifically Requirement 12 – Archaeology. We will also comment on the Outline Archaeological Mitigation Strategy.	The Applicant notes this comment and welcomes any further comments from HE on Application documentation. For the avoidance of doubt, the Applicant advises that it has submitted ES 3 Appendix 10.6 Archaeological Mitigation Strategy [APP-173] (not an Outline Archaeological Mitigation Strategy). Requirement 12 of the Draft DCO [AS-032] states: <i>Archaeology 12.— (1) The authorised development must not be commenced until a programme of archaeological investigation has been carried out in accordance with the archaeological mitigation strategy. (2) No part of the authorised development may be commenced until a written scheme of investigation for that part has been submitted to and approved by the relevant planning authority. (3) The written scheme of investigation must be substantially in accordance with the archaeological mitigation strategy. (4) The written scheme of investigation must be implemented as approved.</i>
HE-009	Cultural Heritage	4) Specialist Advice We will be providing more details comments on this part of the DCO, as	The Applicant notes this comment and would welcome further discussion on these points as part of the Statement of Common Ground.

ID	Theme	Representation	Applicant's Response
		well as the Outline Archaeological Mitigation Strategy and the approach to mitigation as set out in our PEIR response.	
HE-010	Examination Process	Summary As set out above we will be looking to make further comments in our Written Representation, to ensure that the DCO is appropriately worded to provide necessary mitigation for the historic environment. We are aware the applicant has provided an Issues Tracker and we will provide further comments in relation to some of the questions noted in that document. We are also seeking to work with the applicant to resolve a number of matters through a Statement of Common Ground.	The Applicant welcomes Historic England's involvement in the Examination process.

2.5 National Gas Transmission Plc

Table 2.5 Applicant's Response to National Gas Transmission Plc [\[RR-1407\]](#)

ID	Theme	Representation	Applicant's Response
NGT-001	Protected Provisions	This relevant representation is submitted on behalf of NGT in respect of the Project, and in particular NGT's infrastructure which is within or in close proximity to the proposed Order limits for the Project (the "Order Limits"). NGT will require appropriate protection for retained apparatus, including compliance with relevant standards for works proposed within close proximity to its apparatus. NGT's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times, and must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land or NGT's apparatus, NGT will require appropriate protection and further discussion is required in that regard.	The Draft DCO [AS-032] currently contains draft Protective Provisions for the protection of NGT at Part 5 of Schedule 14 (Protective Provisions) to the Order. The Applicant and NGT will engage to agree the form of bespoke Protective Provisions to be contained within the Draft DCO [AS-032]. The Protective Provisions provide that the undertaker may not otherwise than by agreement appropriate or acquire or take temporary possession of any land or apparatus belonging to NGT, or appropriate, acquire, extinguish, interfere with or override any easement, other interest or right and/or apparatus of NGT. The Protective Provisions ensure that NGT's apparatus is appropriately protected and includes a requirement for NGT's access to its apparatus to be maintained, including in any streets subject to restricted access under the DCO.

ID	Theme	Representation	Applicant's Response
NGT-002	Utilities and Telecoms	NGT infrastructure within/in close proximity to the proposed Order Limits NGT has Feeder Main – FM05 – Yelverton to Stowmarket located within and in close proximity to the proposed Order Limits (plots: 16-003, 16-004, 15-009, 11-036, 06-003, 06-002, 05-049, 06-001 and 05-048). Associated apparatus, including Cathodic Protection Groundbeds/Transformer Rectifier(s), are also located within and in close proximity to the proposed Order Limits. The route of the above mentioned Feeder Main is shown by a blue line on the interaction plan ("Plan") (which will be provided under separate cover to the Planning Inspectorate's email address for the Project given it can't be uploaded via the portal). The proposed Order Limits are shown outlined in red on the Plan. NGT has the benefit of easements to enable the retention and maintenance of, and access to, the abovementioned Feeder Main and associated apparatus,	The Applicant refers to its response to NGT-001.

ID	Theme	Representation	Applicant's Response
		including rights to prevent the following activities within the easement strip: - erection of permanent and/or temporary buildings/structures; - changes to existing ground levels; and - storage of materials. The pipeline easements are indicatively shown by a green line on the Plan.	
NGT-003	Protected Provisions	Protection of NGT Assets As a responsible statutory undertaker, NGT's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGT has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the proposed Order Limits. The above mentioned Feeder Main and its associated apparatus form an essential part of the gas National Transmission System (NTS). NGT therefore require protective provisions to be included within the draft Order to ensure that the apparatus and	The Applicant notes this comment and will continue to engage with NGT to agree the form of Protective Provisions. The Applicant refers to its response to NGT-001

ID	Theme	Representation	Applicant's Response
		associated land interests are adequately protected and that relevant safety standards are complied with during construction and operation of the Project. NGT's standard form of protective provisions ("Protective Provisions") have been commercially assessed and deemed necessary in their entirety in order to protect its assets. As such, it is this standard form of Protective Provisions which NGT require to be included on the face of the Order in order to ensure adequate protection. Unfortunately, the Applicant has not attempted to liaise with NGT on the abovementioned Protective Provisions and as such no progress has been made in this regard, despite NGT's attempts to enter into discussions dating back to August 2025. NGT is disappointed that appropriate priority does not appear to have been given to the protection of its assets in connection with the Project.	

ID	Theme	Representation	Applicant's Response
		Unless and until NGT is satisfied that adequate protections have been secured by way of agreed protective provisions, NGT must object to the Order, and participate in the Examination as necessary.	
NGT-004	Compulsory Acquisition	Compulsory Acquisition Powers in respect of the Project As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land, NGT will require further discussion with the Applicant.	The Applicant agrees with this comment and will engage with NGT to agree the form of Protective Provisions.
NGT-005	General remarks	Summary NGT reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to attempt to liaise with the Applicant with a view to reaching agreement on the inclusion of Protective Provisions in the Order as soon as possible, and will keep the Examining Authority updated on progress at regular intervals.	The Applicant notes and agrees with this comment.

2.6 National Highways

Table 2.6 Applicant's Response to National Highways [[RR-1409](#)]

ID	Theme	Representation	Applicant's Response
NH-001	Transport and Access	1.3 NH objects to the DCO for the following reasons: (a) Further detail is required about the operation of the SRN junctions through which construction traffic will pass to access the site, particularly the A47 junction with the A140.	The Applicant notes this comment. A full response is provided in NH-005 below.
NH-002	Transport and Access	(b) More detailed information about the cumulative impact of the proposed development with others under construction on the same junctions is required.	The Applicant notes this comment. A full response is provided in NH-007 below.
NH-003	Transport and Access	(c) Additional details concerning the SRN and the Construction Worker Travel Plan (CWTP) are required in the Construction Management Travel Plan (CTMP), to provide more assurance about how construction traffic will be managed.	The Applicant notes this comment. A full response is provided in NH-010 below.

ID	Theme	Representation	Applicant's Response
NH-004	Outline Construction Traffic Management Plan	(d) NH requires Requirement 15, relating to the CTMP, to be strengthened.	The Applicant notes this comment. A full response is provided in NH-008 below. The Applicant welcomes any specific comments on the Requirement drafting.
NH-005	Transport and Access	4.1 Traffic and Transport 4.1.1 The focus of the Transport Assessment is on the A140 and other local roads to access the construction sites. However, constriction traffic will access the local road network from the SRN. The A140 junction with the A47 is particularly likely to well used. 4.1.2 Whilst the site of the development is relatively remote from the SRN, NH requires further detail from the Applicant to provide assurance that the SRN junctions will not be adversely affected by construction traffic. 4.1.3 6.3.11.1 Environmental Statement Volume 3: Appendix 11.1 - Transport Assessment (Revision 1) - Part 1 (APP 174) considers the impact on flows on the SRN links in the context of IEMA guidelines. However, there is no information on the impacts at junctions,	A meeting was held with NH on 27 November 2025 to discuss the Scheme and its impact on the SRN (Strategic Road Network). Subsequently a Technical Note was shared with NH on 12 December 2025, which contained further information on the traffic and transport impacts on the SRN including cumulative development impacts. An updated Technical Note was then included in Appendix B.4 of ES Volume 3, Appendix 11.1 - Transport Assessment (Part 1 – 4) [APP-174 - 177]. This, alongside the management measures set out in the Outline CTMP [APP-201] and an AIL report appended within Appendix D of ES Volume 3, Appendix 11.1 Transport Assessment (Part 3) [APP-176] is considered by the Applicant to provide sufficient information on impacts on the SRN associated with construction traffic. Baseline flows on the SRN have been collected from WebTRIS and grown to the peak construction year of the Scheme (2029). Trip

ID	Theme	Representation	Applicant's Response
		which is a more critical concern for NH. This information is requested, including an assessment of Personal Injury Collisions (PICs) at these locations. NH requires traffic modelling to be undertaken if a junction is forecast to experience an increase of over thirty in the peak hour, although further assessment may be needed if the peak shoulders are affected.	generation and distribution calculations are also presented within the Technical Note. As detailed in the Technical Note, the SRN link with the highest level of anticipated construction vehicle movements from the Scheme is the A47 between the A11 and A140 junctions. This sits at a peak daily flow of 27 HGVs (54 movements) and 92 cars, shuttles and LGVs (184 movements). Over the course of a proposed working day, this is not anticipated to exceed 30 vehicles per hour. Proposed construction working hours are detailed in the Outline CTMP [APP-201]. As detailed within the Technical Note, percentage impact from construction traffic on the SRN is evidenced to be negligible (less than 0.3% increase on each respective link), considerably lower than IEMA thresholds. It is therefore considered that the impact of the Scheme on the SRN (A47 and A11) is not significant. The Applicant agrees to provide the requested PIC data relevant to the SRN. A meeting with NH to discuss the points raised in the RR is scheduled for the week commencing 27th July 2026.
NH-007	Transport and Access	4.1.4 The same points apply to the cumulative assessment. NH requests that a more granular assessment of the	A more granular assessment of cumulative impact is provided within Appendix B.4 of the Transport Assessment [APP-174], including an evaluation

ID	Theme	Representation	Applicant's Response
		cumulative impact of construction traffic from multiple projects is provided.	of the cumulative developments included within the assessment and their respective peak development flows. As stated within this Technical Note, percentage impact on NH links does not exceed IEMA thresholds, having a negligible impact on the SRN.
NH-008	Outline Construction Traffic Management Plan	4.2 Construction Management Outline Construction Traffic Management Plan 4.2.1 Whilst the oCTMP is considered to be generally robust, NH would like to see the document strengthened in a number of areas to provide sufficient assurance that the SRN will not be adversely impacted. 4.2.2 Evidence showing traffic will stay below thirty vehicles per hour at key junctions should be provided in the document. This should be augmented by clear information on how trips are distributed and assigned to different routes.	Appendix B.4 of the Transport Assessment [APP-174] is a Technical Note which details the impact of construction traffic on the SRN, and sets out the anticipated construction traffic trip generation and distribution on the SRN, alongside an impact assessment in alignment with IEMA Guidelines. The Technical Note details the proposed trip generation and distribution of construction traffic onto the SRN, alongside the methodology for how this was calculated. As detailed in the Technical Note, the SRN link with the highest level of anticipated construction vehicle movements from the Scheme is the A47 between the A11 and A140 junctions. This sits at a peak daily flow of 27 HGVs (54 movements) and 92 cars, shuttles and LGVs (184 movements). Over the course of a proposed working day, this is not anticipated to exceed 30 vehicles per hour.

ID	Theme	Representation	Applicant's Response
			Proposed construction working hours are detailed in the Outline CTMP [APP-201] .
NH-009	Outline Construction Traffic Management Plan	4.2.3 Defined traffic limits (capped to the numbers contained in the CTMP) should be included in the CTMP. Effective monitoring arrangements should be set out with agreed actions and potential measures if they are exceeded. It should be clear in the document how NH would be involved in this process.	The construction vehicle and workforce trip generation numbers contained within the Outline CTMP [APP-201] represent reasonable worst-case estimates for assessment purposes. While the figures represent a reasonable worst-case scenario, imposing a cap could unnecessarily restrict flexibility during the construction phase, particularly if unforeseen complications arise with the programme or sequencing of site activities. The Applicant remains committed to ongoing engagement with National Highways regarding suitable monitoring arrangements and any necessary management actions. A detailed CTMP secured through Requirement 15 of the Draft DCO [AS-032] will be developed and agreed with Norfolk County Council, in its role as Local Highway Authority (LHA), in dialogue with National Highways prior to the commencement of construction.
NH-010	Outline Construction Traffic Management Plan	4.2.4 NH would like to see the CTMP strengthened, to include a limit on the number of single occupancy car trips to enable an agreed single-occupancy car share ratio to be achieved.	The workforce trip generation figures presented in the Outline CTMP [APP-201] are estimates based on a reasonable worst-case scenario for assessment purposes. As such, it is not considered appropriate to apply a cap on single-

ID	Theme	Representation	Applicant's Response
			occupancy vehicle trips derived from these forecast figures. Notwithstanding this, the Applicant is committed to maximising sustainable workforce travel. A detailed Construction Travel and Workforce Plan (CTWP) developed alongside the CTMP and secured through Requirement 15 of the Draft DCO [AS-032], will be prepared and agreed with Norfolk County Council as the Local Highway Authority, in dialogue with National Highways, prior to the commencement of construction.
NH-011	Transport and Access	Abnormal Indivisible Loads 4.2.5 It is noted that the Applicant has not yet determined the routes it will use for Abnormal Indivisible Loads (AILs). Whilst it is understood why there is a focus on the use of the local roads to access construction sites, the Applicant should be aware that there are some existing constraints to the use of some AILs on the SRN. It should also be noted that NH follows a government Water Preferred Policy, which means we would expect the loads to arrive via the nearest suitable port of entry.	The Transport Assessment [APP-174] and Outline CTMP [APP-201] provide an overview of the anticipated routing for AILs on the Local Road Network (LRN) and Major Road Network (MRN). 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 routing and access points onto the SRN. Routing proposals are designed in alignment with access being made via a suitable nearest port of entry. 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
			relevant Local Highway Authorities, structures' owners and the Police where necessary. A detailed CTMP, secured through Requirement 15 of the Draft DCO [AS-032] , will be developed and agreed with Norfolk County Council, in its role as Local Highway Authority (LHA), in dialogue with National Highways prior to the commencement of construction.
NH-012	Transport and Access	4.2.6 NH will need to agree the routeing of any AILs that intended to use the SRN. further guidance can be found at Abnormal loads and the ESDAL system . Although it is understood that the routes will be finalised in advance of construction, post-consent, NH recommends discussing this matter before a decision is made on the proposed route to ensure there is a workable and acceptable strategy in principle.	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, structures' owners and the Police where necessary. An AIL report has 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. A detailed CTMP, secured through Requirement 15 of the Draft DCO [AS-032], will be developed and agreed with Norfolk County Council, in its role as Local Highway Authority (LHA), in dialogue with National Highways prior to the commencement of construction.
NH-013	Draft DCO	5. The Draft DCO	The Applicant will amend this drafting to refer to "relevant highways authorities" in the next version

ID	Theme	Representation	Applicant's Response
	Transport and Access	5.1 Requirement 15, which relates to the CTMP, in point (3) refers to consultation with the relevant highway authority. NH requests that the Requirement is amended to reflect its specific responsibility for the SRN junctions that may be affected by the CTMP (such as the A47/A140 junction). The Requirement could refer to NH specifically or could state that consultation should take place with the "relevant highway authorities."	of the Draft DCO [AS-032] to be submitted in Examination.
NH-014	Examination Process	6. Summary 6.1 NH is in a position where it objects to the proposals as contained in the DCO application. Consequently, NH's position is that it is unable to remove its objection unless resolution is reached on all outstanding matters (as raised in this relevant representation) prior to the Examining Authority's recommendation to the Secretary of State. 6.2 Should it assist the ExA, NH will respond to any written questions that the panel may have and is willing to attend an appropriate hearing to detail	The Applicant notes this comment and will work towards agreeing a Statement of Common Ground with National Highways, through the Examination process.

ID	Theme	Representation	Applicant's Response
		the impacts of the Authorised Development to NH.	

2.7 National Grid Electricity Transmission Plc

Table 2.7 Applicant's response to National Grid Electricity Transmission Plc [\[RR-1408\]](#)

ID	Theme	Representation	Applicant's Response
NGET-001	Planning, Policy Compliance	As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to apparatus and land which is within or in close proximity to the Project's draft Order Limits. Additionally, NGET must protect its ability to deliver, operate and maintain its future proposed infrastructure. NGET will therefore require appropriate protection for retained or proposed infrastructure, including compliance with relevant standards for works proposed within close proximity of its apparatus or proposed apparatus.	Protective provisions for the protection of NGET have been included at Part 4 of Schedule 14 to the Draft DCO [AS-032] of the protective provisions provides that the undertaker may not acquire, appropriate or take temporary possession of any land or apparatus, or interfere with any easement, interest or right of NGET, except by agreement (which must not be unreasonably withheld or delayed). The solicitors acting for the Applicant and NGET respectively are engaged to discuss the approach to Protective Provisions.
NGET-002	Planning, Policy Compliance	NGET's rights of access to inspect, maintain, renew and repair its retained apparatus must be maintained at all times and access to inspect and	The Applicant notes National Grid Electricity Transmission's concerns and welcomes the further discussion that will take place between the parties in relation to the impact of the Scheme on National

ID	Theme	Representation	Applicant's Response
	Construction and Decommissioning	maintain such apparatus must not be restricted. Similarly, the Applicant must have regard to such reasonable requirements as NGET may articulate in order to ensure the safe, economic and efficient construction, commissioning, operation, maintenance and decommissioning of any future proposed apparatus, including that which may be required in order to facilitate the Project's connection to the National Electricity Transmission System.	Grid Electricity Transmission's apparatus and rights. The Applicant has included, at Part 4 of Schedule 14 of the Draft DCO [AS-032] , a set of protective provisions for National Grid Electricity Transmission's benefit. The Applicant is confident that these protective provisions, along with an associated side agreement if required, will be sufficient to address National Grid Electricity Transmission's concerns.
NGET-003	Legal Land Rights	Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's existing and/or future proposed apparatus, NGET will require appropriate protection. Further discussion and agreement with the Applicant is therefore required in relation to the impact on NGET's existing and/or future proposed apparatus and rights.	The Applicant notes this comment and will engage with NGET to agree the form of protective provisions. In the meantime, protective provisions for the benefit of NGET are included at Part 4 of Schedule 14 of the Draft DCO [AS-032] .
NGET-004	Planning, Policy Compliance	NGET owns and operates the following assets located within and in close proximity to the Order Limits for the Project. These assets form an essential	The Applicant notes this comment

ID	Theme	Representation	Applicant's Response
		part of the electricity transmission network in England and Wales. The details of the electricity assets impacted are as follows: • 4YM 400 kV OHL Bramford – Norwich Main 1 Bramford – Norwich Main 2	
NGET-005	Legal Planning, Policy Compliance	The Grid Connection Statement (EN0110014 APP/7.12) submitted by the Applicant states that the Point of Connection (PoC) for the Project will be located at a new Long Stratton 400 kV National Grid Substation (the National Grid Substation). It is understood that the connection agreement entered into in July 2023 obliged the Applicant to (a) identify a location for the National Grid Substation and (b) to provide the land and secure planning or development consent for the delivery of the same. This DCO Application therefore provides for the compulsory acquisition of the necessary land and powers to construct the National Grid Substation.	The Applicant agrees with this comment
NGET-006	Legal	As stated in the Grid Connection Statement, as part of the ongoing Connections Reform process, the	The Grid Connection Statement [APP-207] outlines the Applicant's current Grid Connection

ID	Theme	Representation	Applicant's Response
	Planning, Policy Compliance	Project received confirmation from NESO that the connection for the solar component of the Scheme has secured a Gate 2. NESO also confirmed that the BESS element of the Scheme has secured a Gate 1. It is important to note in this context that it is NGETs understanding that the new connection agreement will not include the requirement for the Applicant to secure land or consent for the National Grid Substation. National Grid remains committed to constructive engagement with the promoter as their project develops and the notification of a Gate 2 offer for their solar component of the project demonstrates that engagement will be ongoing to project delivery.	agreement. The Applicant agrees that as part of the ongoing Connections Reform process, the Scheme received confirmation from NESO that the connection for the solar component of the Scheme has secured a Gate 2. NESO also confirmed that the BESS element of the Scheme has secured a Gate 1 prioritisation, the indicative connection date of which has not yet been confirmed. While acknowledging the intention for a new agreement, the Applicant maintains that consenting a Point of Connection (POC) through the DCO is essential for East Pye Solar. Excluding this power creates unnecessary uncertainty regarding the connection's location. Including the POC satisfies paragraph 4.11.12 of NPS EN-1, which dictates that the Secretary of State must be satisfied that appropriate network connection arrangements are, or will be, established for the project. The application incorporates all necessary powers to enable either National Grid or the Applicant to deliver the new substation within the land under the Applicant's control. Should National Grid fail to secure the requisite interests and consents for delivery at an alternative location, the new National

ID	Theme	Representation	Applicant's Response
			Grid substation can be executed via the powers held in the Order and upon the land secured by the Applicant. The Applicant remains committed to continuous future collaboration with National Grid Electricity Transmission.
NGET-007	Legal Planning, Policy Compliance	In the Applicant's Grid Connection Statement, it is stated that there are responsibilities for NGET to design and construct the National Grid Substation. For the avoidance of doubt, should the Applicant receive consent for the National Grid Substation as part of the Order, this does not trigger or constitute any obligation for NGET to accommodate any connection to the national grid at such a substation. The wider regulatory and commercial context needs to be fully considered and worked through before the location of the new substation can be confirmed. Although the Connection Reform process is still ongoing, all customers with a Gate 2 offers will, in part, influence the final size, design and location of the final point of connection solution. However,	Pursuant to the terms of its current accepted offer, the Applicant is contracted to identify and provide the land and gain consent for the proposed new National Grid Substation. This has therefore been included as part of the DCO Application. The provisions relating to the Benefit of the Order have been drafted suitably to allow NGET to deliver works relating to the NGET substation (see Article 36(2)). This approach is to give certainty of delivery in accordance with the existing connection agreement. The Applicant acknowledges the comment at NGET-006 regarding the intention for a new agreement and refers to the response outlined above. On a wider note, the Applicant considers that the continuing delays caused by the Connection Reform should not cause corresponding delays to

ID	Theme	Representation	Applicant's Response
		until those Gate 2 offers have been finalised, NGET cannot confirm what that solution will be but must always act in accordance with its statutory duties to provide an economic and efficient connection network.	the planning process, and notes the following points: • Grid connection offers contain contractual deadlines for applying for and securing corresponding planning consents, so these consent applications must be able to progress in order to maintain valid grid connections; • Connection Reform prioritises projects that are further progressed; therefore, contractual milestones pertaining to land rights and planning consent are recognised and rewarded when processing the queue of projects; and • If the planning process is delayed until the Connection Reform is complete, in the hope of achieving more certainty about the grid connection status of various projects, but simultaneously a project is ranked lower in the queue of projects during the Connection Reform for not progressing its planning consent (or, indeed, that project's grid connection offer is rescinded for missing milestones), then development will grind to a halt in the UK until the two can be decoupled. In terms of the implications for delivery, the Applicant's expectation is that National Grid Electricity Transmission will determine that the

ID	Theme	Representation	Applicant's Response
			proposed location for the National Grid Substation is suitable (given the Applicant's site selection methodology being akin to National Grid Electricity Transmission's site selection process). However, the Applicant retains the ability to separately seek consent for the grid connection from the project substation to the National Grid Substation in the unlikely event that National Grid Electricity Transmission subsequently decides that they would prefer to site the National Grid Substation elsewhere.
NGET-008	Legal Planning, Policy Compliance	There are currently no known direct interactions between the Project and NGET new infrastructure projects. Given the Gate 2 offer and the obligation to connect the Project to the National Electricity Transmission System (NETS) combined with NGET's obligation under section 9(2) of the Electricity Act to develop and maintain an efficient, co-ordinated and economical system of electricity transmission. NGET must therefore have regard to the need in the area as dictated by the status of the offers from NESO and offer an economic and efficient solution for all customers. There is therefore the	The Applicant remains committed to continuous future collaboration with National Grid Electricity Transmission including the negotiation of protective provisions to ensure that infrastructure is adequately protected.

ID	Theme	Representation	Applicant's Response
		potential that significant NGET infrastructure will need to be delivered to facilitate the Project's connection to the NETS. As such, there needs to be careful co-ordination and consultation undertaken between NGET and the Applicant to ensure that the scope of infrastructure to be delivered becomes clear and is unhindered through planning and delivery.	
NGET-009	Legal Planning, Policy Compliance	Norwich to Tilbury; is a proposed Development Consent Order, currently at the Examination stage. Norwich to Tilbury is a proposal by NGET to reinforce the high voltage power network in East Anglia between the existing substations at Norwich Main in Norfolk, Bramford in Suffolk, and Tilbury in Essex, as well as connect new offshore wind generation. Whilst there is no physical or functional interaction, the Project is proposed to be situated in close proximity to the intended alignment of the Norwich to Tilbury Project. NGET requires that all its existing and future assets, land, and rights are appropriately protected to	The Applicant notes this comment and welcomes future engagement with National Grid Electricity Transmission including the negotiation of protective provisions to ensure that infrastructure is adequately protected.

ID	Theme	Representation	Applicant's Response
		ensure it can continue to meet its statutory obligations. NGET remains committed to working with the Applicant in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible however NGET must have adequate protection for its future projects, including protection for future assets and the reservation of future land and rights necessary for the delivery of those projects.	
NGET-010	Legal Protected Provisions	NGET require protective provisions to be included within the Order to ensure that its existing and future assets and interests are adequately protected, as well as to ensure compliance with relevant safety standards.	Protective provisions for the protection of NGET have been included at Part 4 of Schedule 14 to the Draft DCO [AS-032] . The Applicant and NGET will continue to discuss and agree those provisions.
NGET-011	Legal Compulsory Acquisition Powers	Where the Applicant seeks powers of compulsory acquisition over NGET land, or land in which NGET holds rights or apparatus or that may be required for future NGET projects, the Protective Provisions must require the Applicant to obtain NGET's prior written consent to the exercise of such powers.	Paragraph 35(1) of the protective provisions for the benefit of National Grid Electricity Transmission, which are included in Part 4 of Schedule 14 of the Draft DCO [AS-032] , already secures this protection: <i>"Regardless of any provision in this Order or anything shown on the land plan or contained in the book of reference to the Order, the undertaker may not appropriate or acquire or take temporary</i>

ID	Theme	Representation	Applicant's Response
			<i>possession of any land or apparatus or appropriate, acquire, extinguish, interfere with or override any easement, other interest or right or apparatus of National Grid otherwise than by agreement (such agreement not to be unreasonably withheld or delayed)."</i>
NGET-012	Legal Compulsory Acquisition Powers	NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with any NGET projects identified during the Examination process, and as negotiations continue, but in the meantime will continue to liaise with the Project with a view to reaching a satisfactory agreement during the Examination process and will keep the Examining Authority updated in relation to these discussions.	The Applicant notes this comment and welcomes future engagement with National Grid Electricity Transmission.

2.8 Natural England

Table 2.8 Applicant's Response to Natural England [\[RR-1410\]](#)

ID	Theme	Representation	Applicant's Response
NE-001	Internationally Designated Sites	Natural England have no amber or red issues identified for internationally designated sites. The Shadow Habitats Regulations Assessment - Revision 1 (Document Reference: APP/7.25, March 2026) has screened out water quality, air quality, and avian impacts to Norfolk Valley Fens Special Area of Conservation (SAC), The Broads SAC, Broadland Special Protection Area (SPA), and Broadland Ramsar due to distance, lack of hydrological connectivity and optimal habitat, and as such no Likely Significant Effects (LSE) have been identified. Natural England agrees with the conclusions of the shadow HRA. Natural England also acknowledge the embedded mitigation measures set out in the Outline Construction Environmental Management Plan which include measures such as avoidance areas, storage of materials and preparation of a Surface Water Drainage Strategy.	The Applicant acknowledges this comment.
NE-002	Nationally Designated Sites	1.2.5 Natural England has no amber or red issues identified for nationally designated sites. The Environmental Statement (Document Reference: APP/6.3.9.1, Volume 3, Appendix 9.1, Flood Risk	The Applicant acknowledges this comment.

ID	Theme	Representation	Applicant's Response
	Water Environment	Assessment & Outline Surface Water Drainage Strategy Revision 2 April 2026, page 32), lists in table 6.1 designated sites that are hydrologically linked to the Order Limits via watercourses and groundwater flow, have a high sensitivity and therefore have potential to be impacted by the Scheme. These include: • Fritton Common SSSI • Pulham Market Big Wood SSSI • Shotesham-Woodton Hornbeam Woods SSSI • Shotesham Common SSS • Hedenham Wood SSSI • Tindall Wood Ditchingham SSSI Two Ancient Woodlands are also hydrologically linked: (a) Saxlingham Grove Ancient Woodland (b) Popes Wood and Doylys Grove Ancient Woodland.	
NE-003	Nationally Designated Sites	1.2.6 Mitigation measures have been outlined in the Environmental Statement Volume 1: Chapter 9 Water Environment – Revision 1 (Document Reference: APP/6.1.9 March 2026 pages 34-39) and the Outline Construction Environmental Management Plan – Revision 1 (Document Reference: APP/7.1	The Applicant acknowledges that Natural England agrees with the conclusions of Chapter 8, Ecology and Biodiversity [APP-044] and Chapter 9 Water Environment [APP-045]. The Applicant further confirms that safeguards provided in the Outline CEMP [APP-196], which

ID	Theme	Representation	Applicant's Response
		March 2026, Table 3.4). These include measures such as avoidance areas, storage of materials and preparation of a Surface Water Drainage Strategy. Natural England welcomes these measures and advise that these are secured. 1.2.7 Provided that the mitigation measures for air and water quality which have been included in the outline CEMP (Document Reference: APP/7.1 Revision 1, March 2026) are followed and secured, National England agrees that impact to the designated sites above can be ruled out.	will be implemented by a detailed CEMP and secured through the Draft DCO [AS-032] will avoid impacts to nationally designated Sites during construction.
NE-004	Protected Species	1.2.9 Natural England's comments on protected species presented at the PIER stage remains outstanding and is therefore an amber issue. 1.2.10 Natural England made the following comments on the DCO project at PIER stage: <i>"It is acknowledged in paragraph 8.84 of the PEIR that protected species licences from Natural England or Defra may be required Applicants should refer to the guidance at Wildlife licences: when you need to apply to check to see if a mitigation licence is required. Via our discretionary advice service (DAS), Natural England can review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it</i>	The applicant acknowledges the response of Natural England with regards to protected species. The Applicant can confirm that no protected species licence application is currently considered to be required. The embedded design principles adopted and detailed within 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 protected species.

ID	Theme	Representation	Applicant's Response
		<i>sees no impediment to a licence being granted in the future should the DCO be issued. See Annex C – Natural England and the Planning Inspectorate for details of the LONI process.”</i> 1.2.11 The Outline Protected Species Mitigation Strategy (Document Reference: APP/6.3.8.10., Volume 3: Appendix 8.10 - Revision 1 March 2026) indicates that licences may be required for water vole/otters, great-crested newts, roosting bats, and badger sett closures. Natural England therefore strongly advise that this is undertaken at the earliest opportunity to prevent delay. 1.2.12 Please refer to Natural England's standing advice, Protected species and development: advice for local planning authorities which is intended to help decision makers understand the impact of particular developments on protected species.	Measures detailed within the ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] provide mitigation to avoid impacts upon protected species, which among other measures, include for pre-commencement surveys to confirm that the existing ecological baseline remains. The document also provides an approach to determining licensing requirements including pre-works inspections of trees, the appointment of an Ecological Clerk of Works (ECoW) to advise the Site manager on an appropriate method of work, consideration of EPSL or CL31 Class Licences (e.g. water vole) and/or the appointment of a licensed consultant registered under Badger Class License WML-CL35. Should design changes lead to impacts for which protected species licences be required, then Natural England would be consulted with following a review of appropriate species licensing guidance. It is noted that the Applicant can rely on NE's Discretionary Advice Service (DAS) to apply for a draft licence and seek a Letter of No Impediment (LONI) as appropriate. See the Consents and Agreements Position Statement [APP-217] for more detail.

ID	Theme	Representation	Applicant's Response
NE-005	Biodiversity Net Gain	1.2.14 Natural England welcome the demonstration of >10% net gains for biodiversity using the Defra Biodiversity Metric. Gains can be secured through planning obligations, conservation covenants or requirements within the DCO. Natural England would welcome a commitment to delivering in excess of 10%.	The Applicant acknowledges that Natural England welcomes the demonstration that the project could deliver Biodiversity Net Gain greater than 10% 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 Applicant's commitment is to a minimum of 10% BNG as secured through Requirement 9 of the DCO. Notably, this aligns with the threshold set out in the latest BNG guidance for NSIPs which provides that a minimum 10% requirement will apply from 2 November 2026. The BNG assessment sets out how that minimum commitment will be achieved (and illustrates that in practice, based on the baseline habitat surveys and the Hedgerow Removals Plan and Green Infrastructure Strategy within the Outline LEMP, the Scheme is able to deliver BNG in excess of that commitment). The Applicant has considered sensitive ecological features throughout the evolution of the Project with embedded mitigation avoiding impacts to sensitive and priority habitats, including designated sites, watercourses, woodland, trees and

ID	Theme	Representation	Applicant's Response
			hedgerows. Where impacts occur they have been limited in so far as possible (e.g. removal of small hedgerow sections to facilitate access and cable route installation). Retained habitats will be enhanced in accordance with the Outline LEMP [APP-199] to deliver the Green Infrastructure Strategy.
NE-006	Biodiversity Net Gain: Local Nature Recovery Strategy	1.2.15 Natural England advise that the Local Nature Recovery Strategies (LNRS), a new mandatory system of spatial strategies for nature established by the Environment Act 2021, could provide opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience. We note that habitats and species measures within the outline Landscape and Ecology Management Plan (oLEMP), (Document Reference: APP/7.4, March 2026) and Biodiversity Net Gain Report - Revision 1(Document Reference: APP/7.23, March 2026) have considered the Norfolk LNRS. Natural England supports the measures to restore vegetation cover, soil structure, ghost ponds and watercourses. The opportunities being delivered through the LNRS could be made more explicit in section 8.9 of the Ecology and Biodiversity Chapter of the Environmental Statement (Document	The Applicant acknowledges Natural England's position that the ambition of the Norfolk Local Nature Recovery Strategy (LNRS) could be more explicit in Section 8.9 of Chapter 8 Ecology and Biodiversity [App-044], notwithstanding, it should be noted that the Scheme design evolution progressed prior to the publication of the LNRS. 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].

ID	Theme	Representation	Applicant's Response
		Reference APP/6.1.8, Volume 1: Chapter 8, Revision 1, March 2026).	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] and Biodiversity Net Gain Statutory Metric [APP-219] .
NE-007	Nationally Designated Landscapes	1.2.16 The proposed project is not located within, or within the setting of, any nationally designated landscapes (National Parks or National Landscapes). As a result, Natural England have no specific comments to make on the further landscape implications of this proposal. No further detailed comments are given.	The Applicant acknowledges Natural England's position on Nationally Designated Landscapes. As per ES Volume 1, Chapter 7 -Landscape and Visual [APP-043] , the Order Limits are not within any national designated landscape.
NE-008	Soils and Agriculture	1.2.17 Natural England provided comprehensive comments on soils and Best and Most Versatile (BMV) agricultural land at the PEIR stage (our ref 516274, dated 5 August 2025) and by email (our ref 532662 dated 25 November 2025). However, a number of these matters remain outstanding and are therefore identified as amber issues.	The principal issue relates to the Cable Route Corridors (CRCs), which are addressed in response to NE009.
NE-009	Soils and Agriculture	1.2.18 We have highlighted that more detailed ALC survey work to cover the whole area of the draft order limits including the cable route corridors are required, setting out our concerns in the Issues Tracker (dated 17 December 2025). It is noted that the Environmental Statement (Volume 3: Appendix	A detailed ALC survey at a density of one sample per hectare has been completed for the Site for all areas excluding the CRC. This is reported in ES Volume 3, Appendix 15.1 – Agricultural Land Classification [APP-182] , and mapped at ES Volume 2, Figure 15.1 - ALC Results [AS-010]

ID	Theme	Representation	Applicant's Response
		15.1 - Agricultural Land Classification – Revision 1, Document Reference: APP/6.3.15.1, March 2026) does not show that ALC surveys have been completed for the cable route corridor.	and reviewed and evaluated in ES Volume 1, Chapter 15 -Soils and Agricultural Land [APP-051]. Therefore, no further ALC survey work is required for all areas except for the CRC. As set out in section 3 of the Outline Soil Resource and Management Plan [APP-204], as secured by Requirement 18 of the Draft DCO [AS-032], a survey to record soil physical characteristics such as horizon depth and texture will be completed prior to work commencing on the CRC. The land quality (ALC grade) will be identified as part of that survey.
NE-010	Soils and Agriculture	1.2.19 In our PEIR response, Natural England advised that where BMV land is identified and where proposed permanent infrastructure will be sited, 1 auger per hectare (plus representative pits), should be used. We note that the <i>“permanent land-take associated with the National Grid substation and infrastructure will be 6ha of BMV and of low magnitude on high-sensitivity resources”</i> . Natural England advise that the siting of this infrastructure is reconsidered to avoid BMV land.	Detailed ALC at one auger per hectare has been completed for the whole of the Order Limits except for the CRC. This includes the areas for fixed infrastructure and which is examined in detailed in ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]. The siting of the NG Substation is dictated by the Point of Connection (PoC). This is described in ES Volume 1, Chapter 4 - The Scheme [APP-040] and in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]. Selecting the PoC involved a number of considerations, as described in Chapter 5.

ID	Theme	Representation	Applicant's Response
			All of the land in the area for the PoC is Grade 2, as set out in Chapter 15 at sections 15.8.36 to 15.8.41. Therefore, there was no opportunity to micro-site the substation to avoid or reduce the effect on BMV land. As set out in ES Chapter 15, there will be a loss of 6.1 ha of BMV land at this point, which is included in the cumulative agricultural effects assessment set out in Table 15.14 and paragraphs 15.8.62 to 15.8.66.
NE-011	Soils and Agriculture	1.2.20 Clarification is needed as to whether peat soils have been identified and if they have been found within the draft order limits, these areas should be avoided. The document Volume 3: Appendix 15.1 - Agricultural Land Classification – Revision 1 (Document Reference: APP/6.3.15.1, March 2026) states, "The southeast corner of the site south of Fairstead Lane is identified as 861b Isleham 2 association, deep permeable sandy and peaty soils affected by groundwater" No other references to peat have been found in the ALC surveys, but this needs to be stated and this land avoided.	The National Soil Map had identified 861b Isleham 2 association soils for a small part of the Site but, as set out in the detailed records of the 1,078 sample points inspected, no peats or peaty soils were identified in the ALC survey and as such there is no land to avoid, as shown in ES Volume 3, Appendix 15.1 – Agricultural Land Classification [APP-182]. Peat deposits are considered in ES Volume 1 Chapter 16 – Ground Conditions Chapter [APP-052]. Deposits are present only within CRC7, adjacent to the Hempnall Beck, within a County Wildlife Site that is also a designated area of irreplaceable fenland habitat. Whilst the ecological constraints in this area alone would prevent the use of shallow trenching, the practical considerations of CRC7 mean that a trenchless crossing, beneath the peat deposits (if present) will

ID	Theme	Representation	Applicant's Response
			in any event be considered to be used in this area. The design of the Scheme will therefore provide mitigation against damage to peat deposits.
NE-012	Soils and Agriculture	1.2.21 Natural England welcomes inclusion of the Outline Soil Resource and Management Plan - Revision 1 (Document Reference APP/7.9, March 2026, paragraph 4.2.12). Natural England supports the commitment to restoring BMV land to its former condition and advise that this is secured. We also welcome the inclusion of Monitoring Procedures and Handling Strategy outlined in the oSRMP. However, some elements of the oSRMP still remain high level with key methods and controls being deferred to a future detailed plan. Natural England expects these issues to be addressed and secured in the detailed SMP through a DCO requirement.	This comment is noted. A detailed Soil Resources and Management Plan will be provided, pursuant to DCO Requirement 18. That final plan will build upon the outline plan and include additional detail for approval at discharge stage.
NE-013	Ancient Woodland and Ancient/Veteran Trees	1.2.23 In our PIER response we requested clarity on the buffer zones as 15m and 30m were cited. Natural England advised that 15m is considered a minimum buffer. The Environmental Statement Volume 1: Chapter 8 – Ecology and Biodiversity - Revision 1 (Document Reference: APP/6.1.8, March 2026, paragraph 8.9.147), states that “The Outline OEMP adopts a minimum 30m buffer zone in relation to Ancient Woodlands, with all maintenance activities (apart from habitat management measures) avoided in these areas”.	The Applicant acknowledges that Natural England advises the 30m buffer for veteran trees. To confirm, the approach taken is as set out in the Design Principles, Parameters and Commitments [APP-213]. • The buffer zone applied for individual trees, groups of trees and non-Ancient Woodland: 15m. • The buffer zone applied for Ancient Woodland: 30m.

ID	Theme	Representation	Applicant's Response
		1.2.24 Natural England advise that reference to the 30m buffer zone should also be recorded in the Landscape and Environment Management Plan, Construction Environmental Management Plan, and Decommissioning Environmental Management Plan (DEMP). We do note that Veteran trees will not be removed and pruning will be avoided (oCEMP, March 2026). 1.2.25 For further advice in relation to working around ancient woodland and ancient and veteran trees when preparing mitigation measures, we advise the Applicant to refer to the standing advice⁵ produced by Natural England and the Forestry Commission.	The buffer zone applied for ancient or veteran trees will be at least 15 times larger than the diameter of the tree or 5 metres from the edge of the tree's canopy, whichever is greater, in accordance with Natural England and the Forestry Commission 'standing advice'. The Design Principles, Parameters and Commitments is secured under Requirement 5 of the Draft DCO [AS-032] and the final design "must accord" with that document. Further detail will be provided on review of the standing advice produced by Natural England and the Forestry Commission.
NE-014	Ecology and Biodiversity	1.3.1 Natural England consider the topics of internationally and nationally designated sites, ancient and veteran trees, and biodiversity net gain as green issues. Natural England agrees with the conclusions of the Shadow Habitats Regulations Assessment - Revision 1 that there will be no LSE at Norfolk Valley Fens SAC, The Broads SAC, Broadland SPA and Broadland Ramsar. We are also satisfied that with the oCEMP mitigation measures for pollution prevention, water-quality monitoring, and controls on surface-water runoff secured, damage to the notified features of the Fritton Common, Pulham	The Applicant acknowledges that Natural England is satisfied with the conclusions of the Shadow Habitats Regulations Assessment (sHRA) Report [APP 220] and satisfied that the mitigation measures proposed within the Outline CEMP [APP-196] will also protect surrounding SSSI'S. The measures will be secured by the final CEMP adopted for the Scheme. The Scheme has the capacity to deliver more than 10% gains for habitats, hedgerows and watercourses whilst complying with the DEFRA

ID	Theme	Representation	Applicant's Response
		Market Big Wood, Shotesham-Woodton Hornbeam Woods, Shotesham Common, Hedenham Wood, and Tindall Wood Ditchingham SSSIs can be ruled out. We advise that these are secured for the relevant phases of construction and operation. The demonstration of >10% biodiversity net gain is supported, but a formal commitment to delivering in excess of 10% would be further welcomed. Additionally, we welcome alignment with the Norfolk LNRS and have provided advise on where this could be strengthened. With regards to working around ancient woodland and ancient/veteran trees, Natural England welcome the implementation of a 30m buffer zone of 30m around veteran trees but for clarity and consistency of use, ask that it is reference and secured in the LEMP DEMP and CEMP.	Metrics' Trading Rules. The Applicant's commitment is to a minimum of 10% BNG as secured through Requirement 9 of the DCO. Notably, this aligns with the threshold set out in the latest BNG guidance for NSIPs which provides that a minimum 10% requirement will apply from 2 November 2026. Similarly, reference to the protection zone for ancient and veteran trees will be clarified within the Outline CEMP [APP-196], Outline LEMP [APP-199]; and Outline DEMP [APP-198].
NE-015	Soils and Agriculture Ecology and Biodiversity	1.3.2 Natural England consider there to be amber issues for protected species and soils and BMV agricultural land. The Outline Protected Species Mitigation Strategy indicates that licences may be required for water vole/otters, great crested newts, roosting bats, and badger sett closures. Natural England ask for clarity as to whether the Applicant has applied for licences. With regards to soils, Natural England highlights issues relating to the completeness of ALC survey coverage, the potential presence of peat, the siting of permanent infrastructure on BMV land and the requirement of	The Applicant acknowledges Natural England's query and confirms that to date no licences have been applied for. The embedded design principles adopted and detailed within 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 semi-natural habitats; and include significant habitat gains for the benefit of protected species.

ID	Theme	Representation	Applicant's Response
		more detail in the Soil Resource and Management Plan.	Outline measures detailed within ES Volume 3, Appendix 8.10 -Outline Protected Species Mitigation Strategy [APP-161] provide mitigation to avoid impacts upon protected species. The document also provides an approach to determining licensing requirements if baseline information evolves pre or post commencement. Should design changes lead to impacts for which protected species licences be required, then Natural England would be consulted with following a review of appropriate species licensing guidance. It is noted that the Applicant can rely on NE's Discretionary Advice Service (DAS) to apply for a draft licence and seek a Letter of No Impediment (LONI) as appropriate. See the Consents and Agreements Position Statement [APP-217] for more detail. It is therefore assumed that the consultee is satisfied that the Applicants approach to confirming the need for a licence and the safeguards included within ES Volume 3, Appendix 8.10 -Outline Protected Species Mitigation Strategy [APP-161] and secured by the Outline CEMP [APP-196] are appropriate.

ID	Theme	Representation	Applicant's Response
			NE's comments on soils are addressed in the responses above.
NE-016	Continued engagement	1.3.3 Natural England does not intend to make oral representations regarding this examination but is happy to work with the Applicant and examining authority to ensure the development will not have adverse impacts on the natural environment.	The Applicant makes note of this comment.
NE-017	International Designated Sites	Commentary and advice: Natural England agrees with the conclusions of the shadow HRA (Document Reference: APP/7.25) that likely significant effects on European sites can be ruled out, either alone or in combination with other plans or projects. With consideration to air emissions from the proposal and impacts to designated sites, we refer you to Appendix 1 of this letter - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs).	The Applicant acknowledges that Natural England agrees with the conclusions of the Shadow Habitat Regulations Assessment (sHRA) Report [APP 220] with regards to European sites (as covered by Internationally Designated Sites).
NE-018	National Designated Sites	<i>Commentary and advice:</i> The Appendix Flood Risk Assessment & Outline Surface Water Drainage Strategy Revision 2 (Document Reference: APP/6.3.9.1) identifies a hydrological link between the draft order limits of the project and the named SSSIs.	The Applicant acknowledges that Natural England agrees with the conclusions of ES Volume 1, Chapter 8 - Ecology and Biodiversity [App-044] that there will be no likely significant adverse effects on Sites of Special Scientific Interest (SSSI).

ID	Theme	Representation	Applicant's Response
		On the basis that the embedded mitigation measures detailed within the oCEMP are implemented and secured, Natural England concurs that there will be no significant adverse effects on the named SSSIs. We advise that the mitigation measures to treat surface water run off for water quality and quantity into sensitive waterbodies listed in table 3.4 of the Outline Construction Environmental Management Plan Revision 1 (Document Reference: APP/7.1) are secured for the entire duration of the construction phase.	with the implementation of the CEMP which will be in accordance with the Outline CEMP [APP-196] . Mitigation measures secured through the Outline CEMP [APP-196] are secured for the duration of the construction phase.
NE-019	Protected Species	<i>Commentary and advice:</i> The Outline Protected Species Mitigation Strategy (Document Reference: APP/6.3.8.10) indicates that licences may be required for water vole/otters, great crested newts, roosting bats, and badger sett closures. Natural England asks for confirmation that these have been applied for and if not, we strongly advise that this is undertaken at the earliest opportunity to prevent delay. To be confirmed. Mitigation and/or compensation to protected species may be required depending on license application.	The Applicant confirms that no such mitigation licences have currently been applied for at this stage of the Scheme as such licences are not considered necessary and that due to the sensitive Scheme design, embedded avoidance measures, and precautionary working measures ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] no licences are considered likely to be required to facilitate the Scheme. Should design changes lead to impacts for which protected species licences be required, then Natural England would be consulted with following a review of appropriate species licensing guidance. It is noted that the Applicant can rely on NE's Discretionary Advice Service (DAS) to apply

ID	Theme	Representation	Applicant's Response
			for a draft licence and seek a Letter of No Impediment (LONI) as appropriate. See the Consents and Agreements Position Statement [APP-217] for more detail.
NE-020	Biodiversity Net Gain	<i>Commentary and advice:</i> Natural England welcomes the demonstration of >10% net gains for biodiversity using the Defra Biodiversity Metric. We welcome reference to the Norfolk Local Nature Recovery Strategy (LNRS) within the BNG Report. Natural England advises that the document could be strengthened, particularly to reflect the final Norfolk LNRS and to provide clearer success criteria, remedial triggers and long-term management responsibilities, ensuring that proposed habitat creation and BNG measures can be delivered effectively. Projects of this scale can and should make a major contribution to local nature recovery in line with the Lawton principles of 'more, bigger, better and more joined up' 6 habitats in the area. We advise that habitats and species measures within the LEMP and BNG delivery, should be aligned with the published Norfolk LNRS. Gains can be secured through planning obligations, conservation covenants or requirements within the	The Applicant acknowledges Natural England's comment on Biodiversity Net Gain and the Norfolk Local Nature Recovery Strategy (LNRS); information regarding success criteria, remedial triggers and long-term management responsibilities will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and in accordance with the Outline LEMP. These will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032].

ID	Theme	Representation	Applicant's Response
		DCO. Natural England would welcome a commitment to delivering in excess of 10%.	
NE-021	Soils and Agriculture	<i>Commentary and advice:</i> We have highlighted that more detailed ALC survey work to cover the whole area of the draft order limits including the cable route corridors are required. We stated in the Issues Tracker (dated 17 December 2025), “It would be expected that an ALC survey should be undertaken within the cable corridor order limits, so as to identify the soil types and ALC grades to inform the Environmental Impact Assessment (EIA), as well as the soil handling and restoration criteria. This will also enable the project to avoid or minimise impacts to best and most versatile (BMV) soils through cable route refinement and feed into the design of potential mitigation to safeguard the soil resources”. It is noted that the amendments do not show that ALC surveys have been completed for the cable route corridor. Natural England advises that there is a risk of soil damage, ALC degradation and long term or permanent loss of BMV agricultural land from the areas not yet surveyed. The temporary displacement of soil during construction as a result of the underground cable installation and temporary access	NE's comments on soils are addressed in the responses above (NE-008 to NE-012).

ID	Theme	Representation	Applicant's Response
		tracks/construction compounds can result in permanent land quality change and soil damage if undertaken inappropriately. Therefore, we advise that detailed ALC surveys are carried out across the whole area within the draft order limits prior to submission.	
NE-022	Soils and Agriculture	Clarification is needed as to whether peat soils have been identified and if they have been found within the draft order limits, as these areas should be avoided.	NE's comments on soils are addressed in the responses above (including NE-011).
NE-023	Soils and Agriculture	<i>Commentary and advice:</i> It is noted in Chapter 15 – Soils and Agricultural Land - (Document Reference: APP/6.1.15), page 69 that 6ha of BMV land will be permanently lost to infrastructure. Given that BMV land is a high-sensitivity receptor, even relatively small areas of permanent land take or long-term downgrading could constitute a significant effect, particularly when considered cumulatively with other developments. The high proportion of BMV land within the order limits area underlines the importance of applying Natural England's guidance regarding thresholds for significant loss (20 ha or more), and ensuring that mitigation, reinstatement, and cumulative assessment measures are clearly presented and robustly justified.	NE's comments on soils are addressed in the responses above. (including NE-010).

ID	Theme	Representation	Applicant's Response
NE-024	Soils and Agriculture	<i>Commentary and advice:</i> Natural England welcomes the inclusion of the outline Soil Management Plan. The Outline Soil Resource and Management Plan(oSRMP) Document Reference APP/7.9 states that <i>"the Applicant commits to, ensuring that the works and restoration of any disturbed land does not result in any downgrading of agricultural land quality. All land affected will be kept at, or restored to, a comparable ALC grade either as part of construction or as part of decommissioning"</i>. Natural England supports the commitment to restoring BMV land to its former condition and advise that this is secured. Natural England recommended in the PIER response the inclusion of rainfall criteria for handling in the soil handling strategy, which includes stop work criteria. This has been included in the Outline Soil Resource and Management Plan (Document Reference APP/7.9, paragraph 4.2.12). Natural England is satisfied that this has been included and advise that it is secured. Natural England welcomes the inclusion of Monitoring Procedures and Handling Strategy outlined in the oSRMP. Some sections of the oSRMP are currently high level and more detailed	NE's comments on soils are addressed in responses NE-015 to NE020 above.

ID	Theme	Representation	Applicant's Response
		methodologies should be included to ensure that soil resources will be adequately protected. Key elements such as soil handling methods, stockpile design, reinstatement techniques, and construction phase monitoring are described only in general terms, with critical details deferred to a later "detailed SMP" Natural England would expect these points to be addressed in the detailed SMP and secured through a DCO requirement. Natural England would advise that a SMP is secured through a DCO requirement.	
NE-025	Ancient Woodland and Ancient/Veteran Trees	<i>Commentary and advice:</i> Natural England advised that 15m is considered a minimum buffer when working around veteran trees. Ancient woodland and ancient and veteran trees are considered irreplaceable habitat and are protected in the National Planning Policy Framework. The Applicant has clarified in the oOEMP that a 30m buffer will be implemented. For clarity and consistency, we advise that the 30m buffer is also referenced in the LEMP, CEMP and DEMP. For further advice in relation to working around ancient woodland and ancient and veteran trees when preparing mitigation measures, we advise the	The Applicant acknowledges that Natural England advises the 30m buffer for veteran trees. To confirm, the approach taken is as set out in the Design Principles, Parameters and Commitments [APP-213]. • The buffer zone applied for individual trees, groups of trees and non-Ancient Woodland: 15m. • The buffer zone applied for Ancient Woodland: 30m. • The buffer zone applied for ancient or veteran trees will be at least 15 times larger than the diameter of the tree or 5 metres from the edge of the tree's canopy,

ID	Theme	Representation	Applicant's Response
		Applicant to refer to the standing advice produced by Natural England and the Forestry Commission, and we would advise that this guidance is referenced specifically within the CEMP and LEMP. The LEMP, CEMP and DEMP should reference the proposed 30m buffer working around veteran trees as detailed in the oOEMP. To ensure strict protection of veteran and ancient trees, the mitigation measures outlined in the oCEMP should be secured. This includes a full BS5837:2012-compliant arboricultural survey pre-construction, strict Root Protection Area protection, arboricultural clerk of works oversight, no-dig methods, soil compaction prevention, dust/runoff control, and micro-siting.	whichever is greater, in accordance with Natural England and the Forestry Commission 'standing advice'. The Design Principles, Parameters and Commitments document is secured under Requirement 5 of the Draft DCO [AS-032] and the final design "must accord" with that document. Further detail will be provided on review of the standing advice produced by Natural England and the Forestry Commission.
NE-026	Development Consent Order (DCO)	<i>Landscape and ecological management plan</i> Natural England welcomes Requirement 7 but advise it should explicitly secure management, monitoring and maintenance of all landscape and ecological measures for the full operational lifetime of the development. This should include long-term habitat performance indicators and remedial actions to ensure delivery of the outcomes set out in the LEMP.	The Outline LEMP [APP-199] includes details on planting proposals for each landscape typology including outline management, monitoring and maintenance measures. Further details will be secured through the LEMP created prior to implementation of the Scheme by, or on behalf of, the Applicant, and in accordance with the Outline LEMP. These will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032] in consultation with

ID	Theme	Representation	Applicant's Response
			Natural England (as the relevant statutory nature conservation body).
NE-027	Protected species mitigation strategy	<i>Protected species mitigation strategy</i> Natural England welcomes that a Protected Species Strategy will be undertaken, we advise this is secured. However, clarification is needed as to whether species licences are required.	The Applicant confirms that due to the sensitive Scheme design, embedded avoidance measures, and precautionary working measures set out in the ES Volume 3, Appendix 8.10 -Outline Protected Species Mitigation Strategy [APP-161], no licences have been applied for at this stage as no licences are considered likely to be required to facilitate the Scheme. Should design changes lead to impacts for which protected species licences be required, then Natural England would be consulted with following a review of appropriate species licensing guidance. It is noted that the Applicant can rely on NE's Discretionary Advice Service (DAS) to apply for a draft licence and seek a Letter of No Impediment (LONI) as appropriate. See the Consents and Agreements Position Statement [APP-217] for more detail.
NE-028	Biodiversity Net Gain	<i>Biodiversity Net Gain</i> Natural England welcomes the BNG requirement and the commitment to a minimum 10% uplift, but we would encourage securing an uplift to the level demonstrated in the submitted BNG assessment. We	The Applicant's commitment is to a minimum of 10% BNG as secured through Requirement 9 of the DCO. Notably, this aligns with the threshold set out in the latest BNG guidance for NSIPs which provides that a minimum 10% requirement will apply from 2 November 2026.

ID	Theme	Representation	Applicant's Response
		also advise created habitats are maintained for at least 30 years or the full operational life.	The BNG assessment sets out how that minimum commitment will be achieved (and illustrates that in practice, based on the baseline habitat surveys and the Hedgerow Removals Plan and Green Infrastructure Strategy within the Outline LEMP, the Scheme is able to deliver BNG in excess of that commitment). The Scheme will deliver a minimum of 10% BNG to be provided and managed throughout its operation. The Outline LEMP [APP-199] will be updated to clarify this and submitted at Deadline 1.
NE-029	Drainage	<i>Surface and foul water drainage</i> Natural England advises that Requirement 11 must explicitly secure inspection and maintenance for the lifetime of the development to ensure continued protection of the SSSI's and Ancient Woodlands listed on page 5 of this letter which are hydrologically linked.	A preliminary maintenance plan for surface water drainage systems has been prepared as part of the Outline CEMP [APP-196] and this will be developed along with the detailed surface water drainage design as secured by DCO Requirement 11.
NE-030	Veteran Trees	<i>Construction environmental management plan</i> Natural England welcomes requirement 13 but advise that the 30m buffer for working near veteran trees is included. We also advise that the mitigation measures to treat surface water run off for water quality and quantity into sensitive waterbodies are also secured.	The Applicant acknowledges that Natural England advises the 30m buffer for veteran trees. To confirm, the approach taken is as set out in the Design Principles, Parameters and Commitments [APP-213].

ID	Theme	Representation	Applicant's Response
			• The buffer zone applied for individual trees, groups of trees and non-Ancient Woodland: 15m. • The buffer zone applied for Ancient Woodland: 30m. • The buffer zone applied for ancient or veteran trees will be at least 15 times larger than the diameter of the tree or 5 metres from the edge of the tree's canopy, whichever is greater. The Design Principles, Parameters and Commitments is secured under Requirement 5 of the DCO and the final design "must accord" with that document. The buffer zone applied for the veteran trees follows the Natural England and the Forestry Commission 'standing advice', which is a material consideration for local planning authorities and should be taken into account when making planning decisions. Moreover, the potential impacts from the development proposals are unlikely to extend beyond this distance and (in line with the standing advice) not require a larger buffer than as calculated.

ID	Theme	Representation	Applicant's Response
			Further detail will be provided on review of the standing advice produced by Natural England and the Forestry Commission. Embedded mitigation measures for pollution management are secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Surface water drainage systems will be provided to accommodate surface water runoff up to and including the 1 in 100 annual probability +45% allowance for climate change rainfall event. The BESS and Project Substation drainage systems will be lined with an impermeable membrane to prevent the percolation of potential pollutants into the strata beneath. These measures are secured within the Outline OEMP [APP-197].
NE-031	Veteran Trees	<i>Operational environmental management plan</i> Natural England welcomes the requirement 14 but advise that the 30m buffer for working near veteran trees is included.	The Applicant acknowledges that Natural England advises the 30m buffer for veteran trees. However as set out in the Design Principles, Parameters and Commitments [APP-213], the buffer zone applied for ancient or veteran trees will be at least 15 times larger than the diameter of the tree or 5 metres from the edge of the tree's canopy, whichever is greater. The Design Principles, Parameters and Commitments is secured under Requirement 5 of

ID	Theme	Representation	Applicant's Response
			the DCO and the final design “must accord” with that document. The buffer zone applied for the veteran trees follows the Natural England and the Forestry Commission ‘standing advice’, which is a material consideration for local planning authorities and should be taken into account when making planning decisions. Moreover, the potential impacts from the development proposals are unlikely to extend beyond this distance and (in line with the standing advice) not require a larger buffer than as calculated.
NE-032	Agriculture and Soils	<i>Soil Management</i> Natural England welcomes Requirement 18 but advises the requirement is explicit in ensuring no soil-disturbing works proceed until a detailed SMP is approved, reflecting the outline SMP and Natural England’s advice on soil protection, handling, reinstatement and monitoring.	The Outline Soil Resource and Management Plan [APP-204] (‘oSRMP’) makes provision for soil disturbance and handling and takes account of Natural England’s ‘Guide to assessing development proposals on agricultural land’ which provides advice on soil management. Requirement 18 in the Draft DCO [AS-032] provides that the detailed Soil Resource and Management Plan must be approved by the relevant planning authority prior to construction commencing and be substantially in accordance with the oSRMP.
NE-033	Veteran Trees	<i>Decommissioning and Restoration</i> Natural England welcomes the requirement but advise that the 30m buffer for working near veteran	The Applicant acknowledges that Natural England advises the 30m buffer for veteran trees.

ID	Theme	Representation	Applicant's Response
		trees is included in the Decommissioning Environmental Management Plan (DEMP).	However as set out in the Design Principles, Parameters and Commitments [APP-213], the buffer zone applied for ancient or veteran trees will be at least 15 times larger than the diameter of the tree or 5 metres from the edge of the tree's canopy, whichever is greater. The Design Principles, Parameters and Commitments is secured under Requirement 5 of the DCO and the final design "must accord" with that document. The buffer zone applied for the veteran trees follows the Natural England and the Forestry Commission 'standing advice', which is a material consideration for local planning authorities and should be taken into account when making planning decisions. The potential impacts from the development proposals are unlikely to extend beyond this distance and (in line with the standing advice) not require a larger buffer than as calculated.
NE-034	Air Quality	With consideration to air emissions from the proposal and impacts to designated sites, we refer you to Appendix 1 of this letter - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs).	An assessment of air quality impacts on ecological sites, including Protected Sites (Sites of Special Scientific Interest and Habitats Sites) has been undertaken in ES Volume 1, Chapter 13 - Air Quality [APP-049] . In their Standard Advice for Air Quality Impacts on National Significant

ID	Theme	Representation	Applicant's Response
			Infrastructure Projects (NSIPs), Natural England advise the use of the Institute of Air Quality Management's (IAQM's) 'Guidance of the Assessment of Air Quality Impacts on Designated Nature Conservation Sites' (2020) as well as Natural England's 'Guidance on the impacts of air pollution on protected sites' (2025) to undertake assessments. The assessment presented in ES Volume 1, Chapter 13 – Air Quality [APP-049] has been undertaken in accordance with these guidance documents and therefore considers Natural England's Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs).

2.9 Norfolk Gliding Club

Table 2.9 Applicant's Response to Norfolk Gliding Club [\[RR-1452\]](#)

ID	Theme	Representation	Applicant's Response
NGC-001	Aviation	Norfolk Gliding Club Objection East Pye Solar project - EN0110014 Norfolk Gliding Club (NGC) (owners and operators of Tibenham aerodrome) wishes to register its objections to site 1 of the proposed East Pye Solar Farm on the following grounds: • No collaboration prior to design • No meaningful engagement or consultation following the design • The proposal compromises safe aviation operations • All expert aviation guidance has been rejected • An absence of any mitigation by East Pye • No acceptance of their 'Agent of Change' responsibilities • Project timeline to date	The Applicant has engaged with Norfolk Gliding Club (NGC) as set out at Table 18.6 of ES Volume 1 Chapter 18 Other Environmental Matters [APP-054], to understand the specific operations and request information from NGC to inform technical assessments presented in ES Volume 3 Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [AS-025 to AS-029] and the High Level Investigative Report [APP-222]. The Applicant is preparing a Statement of Common Ground with NGC and will continue to engage with NGC as the project progresses, The assessments have been undertaken in accordance with the available guidance, industry best practices, an assessment methodology employed on other NSIP and DCOs, as well as information provided by Norfolk Gliding Club. The determined impact upon Norfolk Gliding Club activities are based on geometric modelling results, recognised assessment methodologies,

ID	Theme	Representation	Applicant's Response
			established aviation guidance, and professional judgement. Please refer to the responses provided at NGC-002 to NGC-016 to each matter in the bullet point list.
NGC-002	Aviation	No collaboration prior to design Government planning guidelines in the form of the NPS EN-1 section 5 refers to the need for collaboration in the design process. There has been no collaboration in the design and the adverse impact it would have on aviation safety with respect to Tibenham airfield. The Glint and Glare assessment carried out by the Applicant's consultant, Pager Power (PP), was published by them in March 2024, six months before they made contact with NGC to understand our flight operations.	Please note the response at NGC-001 above relating to engagement with NGC. The Applicant has assessed concerns raised by NGC specifically in ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [AS-025 to AS-029] and the High Level Investigative Report [APP-222]. The assessment concludes that the Scheme is not predicted to significantly affect their operations.
NGC-003	Aviation	No meaningful engagement or consultation following the design After the initial contact by PP in October 2024 there were a number of emails between NGC and PP ostensibly to help with the preparation of a Glint and Glare study.	Please note the response at NGC-001 above relating to engagement with NGC.

ID	Theme	Representation	Applicant's Response
NGC-004	Aviation	Despite the clear and unambiguous guidance contained in NPS EN1, the NPPF, the contents of other national planning policy and guidance and that from various aviation bodies, at no point has the Applicant engaged with us with the aim of understanding and proactively mitigating the effects of its proposals on NGC in a meaningful way.	Please note the response at NGC-001 above relating to engagement with NGC. The Applicant has assessed concerns raised by NGC specifically in ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [AS-025 to AS-029] and the High Level Investigative Report [APP-222]. The assessment in [APP-188] concludes that the Scheme is not predicted to significantly affect their operations.
NGC-005	Aviation	Only two meetings have been held, both at the request of NGC, one in January 2025 and a second in February 2026 at which detail flight operations were provided to assist PP, who admitted to having no aviation experience, in producing a realistic Glint and Glare study. At the second meeting, PP acknowledged that they had taken the Glint and Glare study published in March 2024 from another airfield and just changed the names. They promised a revised assessment within two weeks – as at May 2026 we are still waiting.	The Applicant has met with the NGC to enable their consultant to geometrically model their operational activities. The assessments undertaken by the Applicant have been carried out by competent experts with experience in over 1,800 Glint and Glare and Aviation assessments across numerous projects, including NSIPs and DCOs, on a national and international scale. The technical assessments and conclusions have considered industry best practices informed by pilots and published guidance. The Applicant acknowledges that two meetings were held with Norfolk Gliding Club; however, Pager Power tried extensively to engage

ID	Theme	Representation	Applicant's Response
			throughout this time and to obtain the appropriate information to conduct the glint and glare assessment (see NGC-016 below) between these meetings. The meeting took place in February 2026 to understand their operations, to ensure up to date information was available to model operational activities. The updated assessment was completed in March 2026 and submitted with the DCO Application ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [AS-025 to AS-029]. Pager Power has over 20 years of experience providing safeguarding assessments for aerodromes in the UK and internationally. Pager Power's founder held a Private Pilot License for over 10 years and attended the meeting with Norfolk Gliding Club in February 2026. In addition, Pager Power's methodology in relation to aviation receptors has been informed by consultation with pilots, aerodromes (safeguarding teams) and safeguarding bodies (such as CAST) and are undertaken in accordance with relevant aviation guidance and industry best practice. The Applicant notes that Norfolk Gliding Club have stated in their Relevant Representation that the

ID	Theme	Representation	Applicant's Response
			initial Glint and Glare study (dated May 2024, updated May 2025 and published at the Statutory Consultation Stage in June 2025 at Appendix 18.1 of the Preliminary Environmental Information Report) related to another airfield with the name changed to suit the East Pye project. The Applicant disagrees with this. If specific airfield operations are unknown, unpublished or not provided, it is Pager Power's methodology to assess standardised general aviation receptors including the final sections of the visual circuits and a splay of one-mile straight line approaches. The specific details of this can be found in Section 4.2.2 of ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025] . The dimensions using this methodology are considered to be consistent between airfields, however, runway threshold heights and orientations, as well as the details of the specific project will not generally be consistent.
NGC-006	Aviation	The proposal compromises the operational safety of the club Site 1 of the solar farm is situated in line with the extended centreline of our East/West runway only 1.5 km from the threshold (see attached Google Earth image, Tib-R08-EFATO-Combined.jpg). As such it	The Applicant has assessed concerns relating to Engine Failure After Take-Off (EFATO) for Norfolk Gliding Club within the High Level Investigative Report [APP-222] . The assessment concludes that the Scheme is not predicted to significantly reduce the available space for EFATO and Glider

ID	Theme	Representation	Applicant's Response
		will present an aviation safety risk to our normal operations.	Launch Failure (GLF), based on the available guidance and best practice.
NGC-007	Aviation	1. In relation to aborted aerotow launches where two aircraft will need to make emergency landings.	The Applicant has assessed concerns relating to aborted aerotow launches (i.e. Glider Launch Failure (GLF)) for Norfolk Gliding Club within the High Level Investigative Report [APP-222] . The assessment concludes that the Scheme is not predicted to significantly reduce the available land for Engine Failure After Take-Off (EFATO) and GLF, based on the available guidance and best practice. The Applicant notes that no further technical information regarding acceptable thresholds of available land has been made available to the Applicant by Norfolk Gliding Club.
NGC-008	Aviation	2. In relation to Engine Failure After Take-Off (EFATO) and similar scenarios where landing on top of the panels would be the only option with potentially fatal results.	The Applicant has assessed concerns pertaining to EFATO for Norfolk Gliding Club within the High Level Investigative Report [APP-222] . The assessment concludes that the Scheme is not predicted to significantly reduce the available space for EFATO, based on the available guidance and best practice.
NGC-009	Aviation	3. In relation to Glint and Glare issues, which PP claim will not happen, and will disrupt the pilot's ability to see other aircraft, (see attached photograph IMG_7401.jpg).	The Applicant has assessed the glint and glare impacts specifically for Norfolk Gliding Club ES Volume 3 Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [AS-025 to AS-029] and a Glint and Glare Addendum - Norfolk Gliding

ID	Theme	Representation	Applicant's Response
			Club. The assessments consider instances of significant glare relative to a pilot's position and the field of view of reflecting panels. The addendum concludes that pilots are not predicted to be significantly impacted, and that mitigation can be implemented by technical design if required.
NGC-010	Aviation	4. In relation to the thermal plume effect which will cause unnecessary disruption to flight paths of student pilots in circuit.	The Applicant has assessed the impacts of thermal plumes within the High Level Investigative Report [APP-222] . The assessment concludes that thermal plumes are not judged to cause a significant impact, considering the weak nature of thermals arising from wasted energy from solar panels and the expected vertical separation between pilots during circuits and the height of the solar panels.
NGC-011	Aviation	5. In relation to the potential for bird strike where they are attracted to the panels due to the 'lake effect'.	It is considered likely that the Scheme will result in increased opportunity for nesting bird species; primarily, this will benefit passerine species associated with agricultural habitats (for example: yellowhammer <i>Emberiza citrinella</i>), which pose no significant risk regarding bird strike. No large open areas of wetland habitat or similar open habitat will be created that will attract flocks of gulls and wildfowl (Canada geese <i>Branta canadensis</i> for example) potentially representing a greater risk of bird strike and the Order Limits are

ID	Theme	Representation	Applicant's Response
			not present within or in close proximity to areas of wetlands that support large congregations of waterbirds and there is little existing evidence to suggest that such species are attracted to solar arrays mounted on terrestrial habitats.
NGC-012	Aviation	6. Since these issues are likely to occur at relatively low levels, the outcome of any accident is likely to be fatal.	The Applicant notes this comment and reiterates that it has assessed the concerns pertaining to Norfolk Gliding Club within ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [AS-025 to AS-029] and the High Level Investigative Report [APP-222] . ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] assessed the potential for major accidents and disasters as a result of the Scheme, and concludes that all major accident and disaster risk events associated with the construction, operation and maintenance, and decommissioning of the Scheme can be appropriately mitigated through design and the application of management plans that will be submitted as part of the DCO Application.
NGC-013	Aviation	All expert aviation guidance has been rejected The Civil Aviation Authority (CAA), their Aerodrome Advisory Team (AAT), the Combined Aerodrome Safeguarding Team (CAST) and the General Aviation Awareness Council	The Applicant has outlined the guidance considered in all technical assessments within ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [AS-025 to AS-029] and the High Level Investigative Report [APP-222] ,

ID	Theme	Representation	Applicant's Response
		(GAAC) amongst others have all provided advice and guidance on the aviation safety risks associated with solar panel installations.	which includes guidance published by the Civil Aviation Authority (CAA), the Airfields Advisory Team (AAT, now disbanded) and the Combined Aerodrome Safeguarding Team (CAST). The Applicant notes that guidance published by the General Aviation Awareness Council (GAAC) outlines guidance for the DCO process and engagement, and not specific technical guidance. The Applicant acknowledges a response from the GAAC, on behalf of Norfolk Gliding Club, reiterating their objections.
NGC-014	Aviation	After their initial contact in October 2024, it was obvious from the email exchanges that PP had little understanding of mixed gliding and power operations and at our insistence a meeting was convened in January 2025 at Tibenham where our concerns were explained. Subsequent documents published by PP showed that those guidelines were ignored 5. An absence of any mitigation by East Pye After a second meeting in February 2026, again at the request of NGC, the East Pye Solar team (EPS) agreed they would consider mitigation but as yet (May	In respect of glint and glare, solar reflections towards all aerodromes could be operationally accommodated, and if required, panels can be further mitigated by changing the backtracking angle to tilt solar reflections away from receptors; further mitigation can be implemented by changing the configuration of panels, such as the azimuth, tilt (for fixed panels) and backtracking angle (for single-axis tracking panels). This is set out in the Outline OEMP [APP-197] . Notwithstanding, the Applicant draws attention to the technical conclusions of the assessments, which do not identify likely significant adverse effects on aviation activity at Tibenham Airfield that would necessitate mitigation.

ID	Theme	Representation	Applicant's Response
		2026) no proposals have been provided to NGC for consideration.	Measures to minimise glint and glare are secured through the Outline CEMP [APP-196] and Outline OEMP [APP-197] , in accordance with Requirements 13 and 14 of the Draft DCO [AS-032] .
NGC-015	Aviation	No acceptance of their 'Agent of Change' responsibilities Planning guidelines show that EPS as the 'Agent of Change', have a responsibility for ensuring that its proposed infrastructure does not create new safety hazards for pre-existing airfields. As noted above, EPS would appear not to accept that responsibility and have failed to provide any mitigation proposals.	The Applicant notes this comment and reiterates that it has assessed the concerns pertaining to Norfolk Gliding Club within ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [AS-025 to AS-029] and the High Level Investigative Report [APP-222] .
NGC-016	Aviation	The project timeline to date with respect to NGC 1. March 2024 – PP (consultants for EPS) produce their Glint and Glare assessment for Tibenham airfield prior to any consultation with NGC. 1. October 2024 – PP contacted NGC for guidance on NGC flight operations	The Applicant notes the comment and project timeline. With respect to point 5, the Planning Inspectorate approach the prescribed 'consultation bodies' for comment on an EIA Scoping Report prior to providing their Scoping Opinion. The 'consultation bodies' are defined under regulation 3 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and do not include for consulting with NGC. It should be noted

ID	Theme	Representation	Applicant's Response
		2. October to December 2024 – Multiple emails between NGC and PP to try and help their understanding of the complexity of mixed power and gliding operations 3. December 2024 – NGC report to EPS about the aviation safety risks associated with solar panel installations 4. January 2025 – Meeting at Tibenham, NGC provided guidance as to the flight operations and questioned how the issues of Engine Failure After Take Off (EFATO), bird strike and thermal plume were going to be addressed 5. June 2025 – Public meeting in the village hall attended by one of our members who was asked we had not responded to PINS in respect of the EIA scoping opinion. Since we were not made aware of any such report, perhaps due to a lack of engagement by EPS, it is difficult to see how we could have responded	however that consultation was undertaken with the Civil Aviation Authority (CAA). As noted at NGC-005, respectfully, the Applicant does not accept that Pager Power has 'falsified' the glint and glare assessment. The Applicant's consultants Pager Power engaged with Norfolk Gliding Club from October 2024 to establish the circuit information (dimensions, heights and descent angles) so that appropriate receptors could be established for the glint and glare assessment. The Applicant was aware that certain circuit information was available as it had been provided to Pager Power who were providing glint and glare services for the adjacent development to the Scheme, 'Land at Station Road' (planning ref: Application 2024/3817 '<i>Solar photovoltaic (PV) farm development with ancillary infrastructure, security fencing and access. Land To the North of Station Road Tivetshall St Margaret Norfolk</i>'). In May 2025, the applicant of the Land at Station Road development (ref: 2024/3817) consulted Norfolk Gliding Club and the information outlined above was provided so that receptors could be established. Pager Power requested that the same receptors be used for the

ID	Theme	Representation	Applicant's Response
		6. July 2025 – Detailed response by NGC to the EIA report and the aviation safety issues associated with solar panel installations 7. February 2026 – Meeting at Tibenham, PP admitted they had falsified the Glint and Glare assessment. PP agreed to produce the correct assessment within 2 weeks – nothing received to date (May 2026). PP continued to show a total lack of understanding in respect of GA flying and lookout and insisted that glare could not happen despite the attached photo, IMG_7401.jpg 8. May 2026 – Notification by EPS of the need to register as an Interested Party with respect to the DCO process	Scheme, which was only confirmed by Norfolk Gliding Club at an on-aerodrome meeting in February 2026. The first iteration of the glint and glare assessment for the East Pye Solar Scheme (dated May 2024, updated May 2025 and published at the Statutory Consultation Stage in June 2025 at Appendix 18.1 of the Preliminary Environmental Information Report), prior to confirmation of the specific Norfolk Gliding Club receptors, used standardised receptors generally applicable to General Aviation activity. The receptors include a splay of final one-mile straight line approaches, and the final sections of visual circuits (base legs and joins). This is Pager Power's approach when specific airfield operations are unknown or not published. Pager Power did not claim that these were a direct assessment of Norfolk Gliding Club's operations and made clear throughout engagement that the full assessment of the appropriate receptors would be undertaken once the information was provided. The glint and glare assessment was then updated to consider the specific receptors outlined by Norfolk Gliding Club in March 2026 and submitted with the DCO Application (ES Volume 3 Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5))

ID	Theme	Representation	Applicant's Response
			[AS-025 – AS-029] . Appendix J to this document specifically relates to Norfolk Gliding Club.

2.10 Norfolk Wildlife Trust

Table 2.10 Applicant's response to Norfolk Wildlife Trust [[RR-1453](#)]

ID	Theme	Representation	Applicant's Response
NWT-001	General remarks	We recognise the need for renewable electricity to facilitate the transition to low-carbon electricity generation and supply in the UK. Our interest in the East Pye Solar Farm project that is the subject of this DCO application ('the Project') relates to its impacts on wildlife and ecology in Norfolk, both in terms of existing wildlife and ecological features and the potential ecological enhancements to make a meaningful contribution to nature recovery. Norfolk Wildlife Trust has engaged with the Island Green Power Project Team, and their ecological consultants, regarding the Project as part of the pre-application process. Our comments below detail areas of interest and concern and will be the focus of our representations and engagement as part of the DCO application process.	The Applicant thanks Norfolk Wildlife Trust's for its engagement with the Applicant during the pre-application process and welcomes further engagement throughout the Examination. The Applicant notes Norfolk Wildlife Trust's interest in the ecological impacts of the Scheme. Responses to the areas of concern are provided below.

ID	Theme	Representation	Applicant's Response
NWT-002	Need for the Scheme	We note though that new information may come to light during the Examination process and reserve the right to comment on additional matters to those detailed below should this be necessary to support our goal of securing the best possible outcomes for wildlife and biodiversity. Norfolk Wildlife Trust supports solar energy development in principle, recognising its importance in meeting the UK Government's commitments on energy security and net zero carbon emissions by 2050	The Applicant welcomes Norfolk Wildlife Trust's continued engagement in the Examination process. The Applicant notes Norfolk Wildlife Trust's support in principle for solar energy development. The Statement of Need [APP-206] sets out the national need for utility-scale solar generation in support of the Clean Power 2030 targets and net zero commitments.
NWT-003	Scheme design	The Project must be designed, constructed, operated and decommissioned in a way that: 1) Avoids harm to designated sites, priority habitats and protected species. 2) Delivers ambitious biodiversity net gain, exceeding the statutory minimum. 3) Contributes meaningfully to nature recovery and ecological connectivity at a landscape scale; and	The likely effects on ecology and biodiversity are assessed in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], together with mitigation measures. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the Design Approach Document [APP-212]. The mitigation hierarchy has been applied to avoid, reduce, mitigate or compensated for, through the design process. Mitigation is secured through various management plans including the Outline CEMP [APP-196], the

ID	Theme	Representation	Applicant's Response
		4) Provides genuine and lasting benefits to local communities.	Outline OEMP [APP-197], the Outline DEMP [APP-198], the Outline LEMP [APP-199] and the Outline Protected Species Mitigation Strategy [APP-161]. The Applicant's commitment is to a minimum of 10% BNG as secured through Requirement 9 of the DCO. Notably, this aligns with the threshold set out in the latest BNG guidance for NSIPs which provides that a minimum 10% requirement will apply from 2 November 2026. The Biodiversity Net Gain Report [APP-218] illustrates that in practice, based on the baseline habitat surveys and the Hedgerow Removals Plan and Green Infrastructure Strategy within the Outline LEMP, the Scheme has the potential to deliver BNG in excess of that commitment), including: • 37.42% gain for habitats; • 31.35% gain for hedgerows; and • 16.08% gain for watercourses. The Green Infrastructure Strategy [AS-005] seeks to retain and enhance existing vegetation, where possible, to aid the integration of the Scheme within the environment and respond to the prevailing character as far as practicable. New

ID	Theme	Representation	Applicant's Response
			woodland belts and native tree planting provide screening to the Scheme as well as improves biodiversity and supports green infrastructure connectivity. The Applicant is committed to the provision of new permissive paths and community accessible space, as set out in the Design Principles, Parameters and Commitments [APP-213] and Outline LEMP [APP-199] which will provide opportunities for access and recreation.
NWT-004	Ecology and Biodiversity	NWT has reviewed the Environmental Statement ("ES"), in particular Chapter 8 Ecology and Biodiversity (APP-108), together with associated ecological documentation. Whilst the Applicant concludes that there will be no significant adverse residual ecological effects following mitigation, NWT considers that several important ecological matters require detailed scrutiny during Examination. At present, NWT considers that further information and design refinement are required before the Project can be considered acceptable in ecological and environmental terms. Our focus during	The likely effects on ecology and biodiversity are assessed in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], together with mitigation measures. The assessment has considered relevant legislation, planning policy and guidance documents throughout, while the evaluation of ecological receptors complies with guidelines set out by the Chartered Institute of Ecology and Environmental Management (CIEEM) with the method of the assessment. The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity considerations embedded into the design principles, design buffers and design evolution, as set out in the Design Approach Document [APP-212]. The mitigation hierarchy

ID	Theme	Representation	Applicant's Response
		the Examination will be on securing comprehensive mitigation and compensation for potential impacts.	has been applied to avoid, reduce, mitigate or compensated for, through the design process. Mitigation is secured through various management plans including the Outline CEMP [APP-196], the Outline OEMP [APP-197], the Outline DEMP [APP-198], the Outline LEMP [APP-199] and the Outline Protected Species Mitigation Strategy [APP-161]. The Applicant is satisfied that the assessment of Ecology and Biodiversity is robust and delivers appropriate mitigation and compensation.
NWT-005	Scheme Description Site Selection	General comments We wish to make a number of higher-level points about the overall process. Strategic land-use approach – there appears to be a complete lack of strategic thinking on siting of the large-scale solar schemes across Norfolk, a lack of county-level and regional planning, together with inadequate government guidance on the overall approach. This leads to a local feeling that the criteria are nothing more than land availability and grid connection availability.	The Applicant notes this comment. The Statement of Need [APP-206] explains that the Scheme's proposed location is an appropriate location for large-scale solar due to the availability of grid infrastructure with the capacity to transmit the low-carbon energy generated by the Scheme. Norfolk benefits from higher levels of irradiance compared to other parts of the UK. 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.

ID	Theme	Representation	Applicant's Response
NWT-006	Consultation and Engagement	Lack of local voice – the nature of the process, complexity, lack of detail, inefficient scheme design, heavy-handed approach to local communities have led to a significant groundswell of local opposition, which cannot be ignored. There is little community benefit evident in the proposals, a great deal of private landowner benefit, and a feeling of significant imposition with a distant corporate, with no community roots. We believe that this is the wrong kind of approach if public acceptance of large-scale renewable schemes is to be secured.	The Scheme has been designed with careful regard to the local area, informed by ongoing consultation, technical engagement, and environmental assessment. Early and continued engagement with the local community, including information events and public consultations, has helped shape the Scheme, as set out in the Consultation Report [APP-024]. The Consultation Report [APP-024] and its Appendices [APP-025 to APP-034] provide details of how consultation feedback, including prescribed consultees and public comments, has been considered and, where appropriate, how they have influenced the design evolution of the Scheme. The Design Approach Document [APP-212] explains how the design of the scheme has evolved; the reasons why particular design choices were made, including those based on environmental and community considerations. A summary of the feedback to the Phase One non-statutory consultation and the Applicant's response is provided in Chapter 5 of the Consultation Report [APP-024]. Feedback received during the statutory consultation under Section 47 and the Applicant's response is provided in the Consultation Report Appendix 10: Section 47 Applicant Response Table [APP-034] and the

ID	Theme	Representation	Applicant's Response
			Applicant's response to Section 42 feedback is provided in Consultation Report Appendix 11: Section 42 Applicant Response Table [APP-035]. The Applicant provided a range of consultation materials, in accordance with legislative requirements. In addition to technical documents, such as the Preliminary Environmental Information Report (PEIR), the Applicant also produced non-technical documents. This included a PEIR Non-Technical Summary (NTS) which provided an overview of the information and findings set out in the PEIR. A full list of the Applicant's statutory consultation materials was available on the Applicant's website and in hard copy at Community Access Points, with further details in Chapter 7 and 8 of the Consultation Report [APP-024]. The Applicant also made available communication channels and held seven information events to ensure members of the community could get in touch to discuss any technical information. 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

ID	Theme	Representation	Applicant's Response
			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).
NWT-007	Decommissioning Funding Compulsory Acquisition	Decommissioning – We seek further information about the legal basis for decommissioning obligations: who pays for this and is the obligation legally vested in successor entities? These are significant local concerns. Whilst the DEMP makes clear the obligations, in the event that Island Green Power no longer owns the site in 60 years time, what mechanisms are there in place to ensure these obligations are still delivered? We also ask what happens to land that has been CPO'd?	The Applicant confirms that, if consent is granted, they have the capability to build, own and operate the Scheme. The Funding Statement [APP-021] demonstrates that the Scheme is financially viable and the delivery of the Scheme in full, can be adequately funded. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker is defined in the DCO and will remain bound by the legally enforceable requirements of the DCO. This is secured through the provisions of Article 37. Decommissioning is secured through Requirement 21 in Schedule 2 of the Draft DCO [AS-032]. Requirement 21 of the Draft DCO [AS-032] provides that decommissioning must commence,

ID	Theme	Representation	Applicant's Response
			for each part of Work No. 1, no later than 60 years following the date of final commissioning for that part and, for the associated development, no later than the final date of decommissioning for the part of Work No. 1 to which it relates. This secures the decommissioning of the development and ensures that the consent is time limited and therefore that the scheme is temporary. Failing to comply with Requirement 21 would be a criminal offence. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning is regularly re-valued throughout the lifecycle of the Scheme and topped up if necessary. Where Compulsory Acquisition powers are sought over the CRC, the Applicant is primarily seeking the rights to install cabling through the land and not acquire the land itself. As such the interest in the land would remain with the landowner. Land within the Order Limits, excluding the CRC, have been secured via voluntary lease agreements ahead of submission, and so will be returned to the landowner at decommissioning.

ID	Theme	Representation	Applicant's Response
NWT-008	Ecology and Biodiversity	Inefficient scheme design – the nature of the landscape and the landscape character of this part of South Norfolk feels wholly unsuited to this kind of development. We would prefer to see the plan reshaped to suit the landscape, rather than the current scheme which tries to reshape the landscape to the scheme plan. The scheme stretches across a huge swathe of land. The ecological character of this place is pockets of ancient woodlands, miles of species rich hedgerows, semi-natural road verges and some roadside nature reserves. There are significant maternity populations of Barbastelle along with other bat species, which thrive on this landscape, along with local populations of rare farmland birds (corn bunting, turtle dove, yellowhammer etc), and rare threatened flora widely dispersed in the landscape. This is not a landscape of large flat fields, sparse with nature. It is dense with nature – understated but infusing the landscape. So the imposition of the scheme per se on such	The design evolution is documented in the Design Approach Document [APP-212] and the Site Selection Assessment [APP-215], and the environmentally-led approach is set out in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]. Ecological considerations, including for barbastelle bats, farmland birds and rare flora, are addressed in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], informed by ES Volume 3, Appendix 8.6 – Bat Activity Survey Report [APP-157], ES Volume 3, Appendix 8.5 – Breeding Bird Survey Report and ES Volume 3, Appendix 8.1 – Ecological Desk Study and Extended Habitat Survey [AS-017]. Mitigation is secured through the Outline LEMP [APP-199] and Outline Protected Species Mitigation Strategy [APP-161]. The Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] assesses the landscape effects of the Scheme considering the worst-case parameters. The Green Infrastructure Strategy [AS-005] seeks to retain and enhance existing vegetation, to aid the integration of the Scheme within the environment. Additionally, it proposes a range of

ID	Theme	Representation	Applicant's Response
		a landscape poses a significant risk. The design of the scheme has a very significant impact footprint to MW output so is considered a very inefficient use of land. We strongly recommend that the developer engage with the Building with Nature accreditation scheme (Building with Nature - Sintali). This provides a clear, integrated framework for delivering green infrastructure that improve social outcomes, strengthen climate resilience, and deliver long term value for developers, planners, and communities.	measures including new woodland belts and native tree planting, hedgerow reinforcement and new planting, alongside grassland creation which supports green infrastructure connectivity across the landscape.
NWT-009	Ecology and Biodiversity	Impacts on County Wildlife Sites and Roadside Nature Reserves The Order Limits include parts of two County Wildlife Sites (CWSs) Lower Spring Wood CWS, and Fritton Grange Meadows CWS, and are adjacent/in the immediate vicinity of several others. The Order Limits also include or adjoin several Roadside Nature Reserves (RNRs), including Bussey's Loke, Market Lane and Parker's Lane. While the applicant proposes to cross both	The Applicant is satisfied that the assessment set out between paragraphs 8.9.47 and 8.9.109 of ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], has adequately assessed impacts to County Wildlife Sites (CWSs) and Roadside Nature Reserves (RNRs). The Scheme has designed out impacts to these sensitive sites through run-off control, pollution prevention and dust control during construction which will be secured by the Outline CEMP [APP-196].

ID	Theme	Representation	Applicant's Response
		CWSs using Horizontal Directional Drilling (HDD), critical details remain unresolved. The Outline Construction Environmental Management Plan (oCEMP) confirms that the precise locations of HDD entry and exit points will only be determined at the detailed design stage.	Stand-off distances of 30m from the CWSs and the adoption of trenchless crossing techniques where appropriate will mitigate impacts. As per Section 4.4 of the Outline Cable Route Construction Statement [APP-216] the technology used for the trenchless crossings (such as HDD) will be determined by feasibility studies carried out at each crossing during the detailed design stage and in accordance with a method statement. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] have been applied to protect CWS and commit to specific CWS avoidance areas; this will include HDD entry and exit points.
NWT-010	Construction	Without this information it is not possible to fully assess the ecological impacts on the designated sites or determine whether the proposed buffer distances are sufficient. NWT is concerned that: - HDD entry and exit compounds may be located too close to sensitive habitats; - Construction compounds, drilling operations, vehicle movements, noise and lighting could adversely	The Applicant is satisfied that the assessment set out between paragraphs 8.9.47 and 8.9.109 of ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], has adequately assessed impacts to County Wildlife Sites (CWSs) and Roadside Nature Reserves (RNRs). The Scheme has designed out impacts to these sensitive sites through run-off control, pollution prevention and dust control during construction which will be secured by the Outline CEMP [APP-196].

ID	Theme	Representation	Applicant's Response
		affect designated features despite the use of trenchless techniques; - The proposed 15m construction buffer and 30m operational buffer may not be sufficient for particularly sensitive habitats, especially lowland fen and ancient woodland habitats. NWT requests that: - HDD entry and exit locations are identified prior to examination close; - Larger precautionary buffers are secured around CWSs and RNRs; - No construction compounds, lighting or storage areas are permitted within these buffer zones; - Detailed hydrogeological assessment is provided for HDD works beneath fen habitats. Specifically relating to Site 3, we have previously recommended that this site is dropped from the site selection due to potential impacts on the CWS/ancient woodland/bats. While we welcome the changes that have been made, we remain concerned about potential impacts of work in this area and ideally	Stand-off distances of 30m from the CWSs and the adoption of trenchless crossing techniques where appropriate will mitigate impacts. As per Section 4.4 of the Outline Cable Route Construction Statement [APP-216] the technology used for the trenchless crossings (such as HDD) will be determined by feasibility studies carried out at each crossing during the detailed design stage and in accordance with a method statement. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] have been applied to protect CWS and commit to specific CWS avoidance areas; this will include HDD entry and exit points.

ID	Theme	Representation	Applicant's Response
		recommend that the site is dropped from the overall scheme.	
NWT-011	Ecology and Biodiversity Transport and Access	Impacts on non-designated road-side verges The ES acknowledges that access to sites may require temporary reductions to overgrown hedgerows and tree canopies adjacent to roads. It states that no other activities are proposed within RNR boundaries, but this does not fully address impacts to verges outside designated RNRs. This is critical due to the ecological importance of many South Norfolk verges. The application does not appear to contain a comprehensive assessment of construction impacts on roadside verge habitats across the transport network. This is an area of high importance for rare botany and we strongly recommend that botanical surveys are undertaken to understand the baseline and to avoid harm, especially in the areas proposed for transport, haul roads, or road widening. Potential impacts include verge widening for construction traffic, creation of passing places, visibility splay improvements at site entrances,	As set out in ES Volume 1, Chapter 11 - Transport and Access [APP-174] and the Outline CTMP [APP-201], construction traffic will be managed through defined access routes and traffic management measures to minimise effects on the Local Road Network and associated assets. This includes the potential to restrict vehicle sizes in some locations to aid manoeuvring and traffic management measures like reducing speed limits during construction which in turn reduces visibility splay requirements. 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. Site Access designs, visibility splays and swept-path analysis is detailed in Appendix C of ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]. Commonly required vegetation reduction to facilitate visibility splay for vehicles and highway works associated with AIL movements would primarily consist of hedgerow trimming and

ID	Theme	Representation	Applicant's Response
		damage from over-running by HGVs and abnormal loads and soil compaction from repeated vehicle movements. Even where no direct habitat removal is proposed, repeated use by construction traffic can degrade species-rich verge vegetation. This is particularly true for Abnormal Indivisible Loads (AILs). Many rare plants survive on verges precisely because they have escaped agricultural improvement. Temporary works can cause disproportionate ecological damage. The Examination should establish the extent of any verge loss, disturbance, compaction or vegetation clearance associated with construction activities and ensure that appropriate avoidance, protection, reinstatement and monitoring measures are secured through the DCO.	overhanging branch reduction, which would not impact the designated features of the RNR'S (rare grassland flora). These matters are subject to detailed design and will be discussed and agreed through a detailed CTMP, secured through Requirement 15 of the Draft DCO [AS-032]. The final CTMP will be developed and agreed with Norfolk County Council, in its role as Local Highway Authority (LHA) prior to the commencement of construction. An extended habitat survey (using UKHab methodology) has been undertaken as reported in ES Volume 3, Appendix 8.1 - Ecological Desk Study and Extended Habitat Survey [AS-017]. This records the findings of a desk-based study and the detailed survey and mapping of habitats identified within the Order Limits. During this extended habitat survey, there is no evidence to suggest that further targeted botanical surveys are required.
NWT-012	Ecology and Biodiversity	Impacts on bats NWT considers bats to be one of the most significant ecological issues arising from the application. The Applicant's own assessment concludes that the Order Limits and surrounding landscape	The embedded design principles adopted and detailed within Design Principles, Parameters and Commitments [APP-213] and illustrated at ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059], include minimum design offsets which will be applied to ancient woodland (30m); veteran and ancient trees (15x stem width

ID	Theme	Representation	Applicant's Response
		support a "nationally important assemblage of foraging and commuting bats" (ES Chapter 8, paragraph 8.9.605). The ES records eleven bat species within the Order Limits including barbastelle, which the Applicant identifies as "the rarest bat in the UK" (paragraph 8.9.605). NWT notes that the Applicant identifies potential construction impacts including habitat fragmentation, disturbance and habitat degradation (paragraphs 8.9.603–8.9.604). NWT is concerned that the significance of these impacts may be understated given the acknowledged importance of the bat assemblage and the extensive reliance of bats on hedgerow networks, woodland edges, tree lines and watercourse corridors throughout the landscape. For example, The Environmental Statement (paragraph 8.9.607) concludes that temporary hedgerow gaps of up to 10m would not significantly affect bat movement. NWT does not agree that this conclusion is sufficiently evidenced. For barbastelle bats in particular, even	or 5m - whichever is greater); woodland/groups of trees and hedgerows (15m); and ponds (30m); which would avoid impacts to roosting bats, whilst also maintaining access to and along features used for commuting and foraging. Measures for the protection of roosting bats in trees are included in ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]. Further mitigation measures are set out in the Outline CEMP [APP-196], the Outline OEMP [APP-197] and the Outline LEMP [APP-199]. The Outline LEMP sets out the long-term management of habitats that will benefit foraging and commuting bats; ensuring that the operational phase of the Scheme provides increased foraging resources for bat species; including local Barbastelle bats. Detailed management plans will be submitted to and approved in accordance with the relevant Requirements of the Draft DCO [AS-032]. The Biodiversity Net Gain report [APP-213] which will be secured through Requirement 9 of the Draft DCO [AS-032] identifies an anticipated increase of 31.35% net gain for hedgerows which will increase the abundance of valuable habitats for bats within the DCO Limits.

ID	Theme	Representation	Applicant's Response
		relatively small breaks in linear features can reduce permeability of commuting routes and alter movement patterns. The ES demonstrates that bats are utilising the landscape across multiple development parcels rather than within isolated site areas. The Scheme therefore has the potential to affect ecological functionality at a landscape scale. Numerous bat species, particularly barbastelle and Myotis species, are known to rely heavily upon connected networks of hedgerows, woodland edges and dark commuting corridors. Scientific evidence demonstrates that even relatively small interruptions to linear habitat features can affect commuting behaviour and habitat use.	In regard to NWT's position on the potential for small hedgerow gaps impacting Barbastelle bats ability to continue to utilise the wider environment for foraging resources, it is the opinion of the applicant that the avoidance measures/habitat retention measures provided within the Works Plan [AS-002-AS-003] and Outline LEMP [APP-199], Barbastelle bats will be able to commute freely along retained hedgerows (with small 10m sections removed). The species (and other bat species) actively commute through a landscape with multiple road barriers (and other physical barriers). This is corroborated by data provided by Norfolk and Norwich Bat Group, which includes Barbastelle bat radiotracking data, showing 11 radio tracked Barbastelles from Tyrells Wood regularly crossing existing road barriers, and includes 3 animals regularly crossing the A140 to forage within habitats to the west. This provides empirical evidence that the species can cross significant barriers and will regularly do so as part of the bats regular routine. Therefore, the relatively minor hedgerow impacts associated with the Scheme (most of which are temporary impacts) are not considered likely to pose a significant barrier to Barbastelle movements in the wider landscape.
NWT-013	Ecology and Biodiversity	WT is concerned that:	The Outline CEMP [APP-196] sets out the detail as to how construction will be managed to

ID	Theme	Representation	Applicant's Response
		a) construction activities may result in temporary severance of commuting routes; b) cable route installation could affect hedgerows, tree lines and other linear landscape features; c) habitat functionality may be degraded even where habitat loss is limited in area; d) increased lighting, vehicle movements and construction disturbance may reduce the suitability of important commuting corridors; e) cumulative impacts across multiple development parcels may not be fully captured through habitat-based assessments.	safeguard sensitive habitats, including the requirements for offsets from woodland, hedges, trees and watercourses. Further, the Outline Cable Route Construction Statement [APP-216], which will be secured by the Outline CEMP, will identify avoidance areas and make use of Horizontal Directional Drilling (HDD) to avoid direct impacts to watercourses and sensitive habitats (e.g. Roadside Nature Reserves (RNRs), Country Wildlife Sites CWSs). Prior to launch and receptor pits being established, feasibility studies will be undertaken to identify the most appropriate technology and method statements drafted setting out details of works. ES Volume 3: Appendix 7.11 - Lighting Strategy [APP-151] confirms the working hours will be predominantly in daylight with nighttime working avoided except in specific circumstances. Where lighting is required during construction to maintain a safe working environment, it will be suitably designed to minimise light spill and glare. As part of the lighting strategy the Ecological Clerk of Works (ECoW) will oversee activities on Site to ensure all ecological mitigation measures are implemented. The Applicant is satisfied that the approach to construction and operation which will be in

ID	Theme	Representation	Applicant's Response
			accordance with the Outline CEMP [APP-197] and the Outline OEMP [APP-197] will not have an impact on commuting corridors, either alone or cumulatively across the scheme.
NWT-014	Ecology and Biodiversity	The Examination should therefore carefully scrutinise: - the spatial distribution of bat activity survey results; - identification of key commuting corridors; - the treatment of barbastelle records within the assessment; - assumptions regarding habitat retention and functionality; - lighting controls during both construction and operation; enforceability of mitigation commitments.	The Applicant has considered the distribution of bats, including Barbastelles, across the Order limits in ES Volume 3, Appendix 8.1 - Ecological desk Study and Extended Habitat Survey [APP-152], Appendix 8.5 - Ground Level Tree Assessment Report [APP-156] and Appendix 8.6 -Bat Activity Survey report [APP-157] and is satisfied that the conclusions within Paragraphs 8.9.580 and 8.9.629 of ES Volume 1, Chapter 8 - Ecology and Biodiversity are robust and appropriate. The embedded mitigation included through the Design Principles, Parameters and commitments [APP-213], in particular offsets from ancient woodland, trees, hedgerows and watercourses and lighting controls during construction and operation, as set out in the Outline CEMP [APP-196] and the Outline OEMP [APP-197], and supported by Volume 3, Appendix 7.11 - Lighting Strategy [APP-151] will

ID	Theme	Representation	Applicant's Response
			mitigate impacts to bats at both roost sites and those utilising hedges for foraging and commuting. Any mitigation required for bats will be set out in method statements in accordance with ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]. The required mitigation will be secured by the Draft DCO [AS-032].
NWT-015	Ecology and Biodiversity	NWT also notes that the Applicant relies substantially on retention of existing hedgerows and habitat corridors to maintain connectivity. Whilst retention is welcomed, NWT considers the Examination should establish whether sufficient buffers are secured around important commuting routes and whether construction activities can realistically be undertaken without adversely affecting corridor functionality.	Design Principles, Parameters and Commitments [APP-213] as illustrated on ES Volume 2, Figure 4.1 -Indicative Masterplan [APP-059] include a minimum of 10m buffer between hedgerows and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. The Scheme has also adopted buffers of 30m from ancient woodland site boundaries and ponds (non-great crested newt ponds), 15 times diameter of tree stem or 5m from the edge of the tree's canopy (whichever is greater) between veteran and ancient trees, and 15m from the canopy of individual trees, groups of trees and non-ancient woodland. These buffers will allow the corridors to maintain their ecological functionality. Whilst the Scheme will retain these features, the Biodiversity Net Gain Report [APP-218] and

ID	Theme	Representation	Applicant's Response
			Biodiversity Net gain Statutory Metric [APP-219] also demonstrate a net gains of 31.35% for hedgerows and 16.08% for watercourses both of which will support habitat connectivity and increase foraging opportunities.
NWT-016	Ecology and Biodiversity	NWT further considers that the Examination should assess whether the proposed biodiversity enhancement measures genuinely compensate for any degradation of existing bat habitat quality. Habitat creation cannot automatically replace established commuting routes and mature landscape features which may take decades to achieve equivalent ecological function. Given the presence of a nationally important bat assemblage and records of barbastelle, NWT considers that a precautionary approach is required.	In accordance with Design Principles, Parameters and Commitments [APP-213] (illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]) which are embedded into the design of the Scheme, features of value to bats are being retained and enhanced. The inclusion of appropriate buffers during construction and operation, as set out in the Outline CEMP [APP-196] and the Outline OEMP [APP-197], will protect and enhance existing habitats of value to bats, notably ancient woodland, trees, hedgerows and watercourses, and support the use of established commuting roots. Within these buffer zones, habitats will be managed for biodiversity with additional planting of woodland and trees, as per the Outline LEMP [APP-199], which will enable bats to establish new commuting routes and incorporate them into their existing ecological network. The Biodiversity Net Gain Report [APP-218] and the Biodiversity Net Gain Statutory Metric [APP-

ID	Theme	Representation	Applicant's Response
			219] demonstrates that there is no degradation of habitats which would be of value to bats, including barbastelles, with biodiversity net gains in habitats (37.42%), hedgerows (31.35%) and watercourses (16.08%).
NWT-017	Lighting	Lighting Impacts We welcome the commitments made to avoid extensive night-time working adopting an 07:00 to 18:00 maximum working hours pattern (March to September). However, the Lighting Strategy acknowledges that night-time lighting may be required during HDD operations because drilling may need to continue continuously for one to two days.	The Applicant is pleased that NWT welcomes the commitments made to avoid extensive night-time working.
NWT-018	Lighting	NWT is concerned that: • Construction lighting could affect bats, particularly barbastelle bats; • Lighting impacts could occur close to designated sites and important commuting routes; • The locations of temporary compounds and associated lighting infrastructure are not yet fully	Method Statement 4: Construction Phase Lighting located within ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] includes protection measures to avoid impacts upon bats, including ECoW monitoring commitments. Construction temporary site lighting will be positioned to ensure that light is directed onto the area of works only with as minimal light spillage upon the areas of ecological importance. The use of LED lighting and cowls, hoods and other similar screens will also be adopted. Any unavoidable

ID	Theme	Representation	Applicant's Response
		defined. NWT seeks a commitment that: • No lighting spill occurs onto woodland edges, hedgerows, watercourses or designated sites; • Lux limits are specified and secured through the DCO; • Lighting design is informed by bat conservation best practice; Monitoring is undertaken where works occur close to known barbastelle roosts.	artificial lighting during the hours of darkness required within the period March to October inclusive will only be permitted following consultation with the ECoW in order to determine the severity of potential impacts and appropriate mitigation steps, including agreed hours of operation and numbers / specification of luminaires. Security lighting may be installed on temporary site compounds following consultation with the ECoW to establish appropriate locations. Security lighting will be limited to the minimum number of luminaires required which will be defined by the ECoW and based on the sensitivity of the habitats potentially affected and baseline lux levels. Security luminaires will be motion-sensitive and set on a short (<2 minute) timer and oriented to reduce upward light spill as far as possible (i.e. horizontally oriented) in order to reduce the potential impact on light sensitive species such as bats. The approach to lighting is set out in ES Volume 3, Appendix 7.11 -Lighting Strategy [APP151], the Outline CEMP [APP-196] and the Outline OEMP [APP-197], together with the Design Principles, Parameters and Commitments [APP-213]. Measures for the protection of bats are set out in

ID	Theme	Representation	Applicant's Response
			ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161] and the Outline LEMP [APP-199] . Detailed plans are secured through Requirements 7, 8, 13 and 14 of the Draft DCO[AS-032] .
NWT-019	Ecology and Biodiversity	Ancient Woodland, Veteran Trees and Ancient Hedgerows NWT welcomes the commitment that no ancient woodland or veteran trees will be removed. However, the Environmental Statement identifies: • Partial removal of 32 hedgerows; • Removal of five trees; • Temporary removal of sections of hedgerow for cable installation and access. Many hedgerows in this landscape are historic features that perform important ecological functions and provide connectivity between designated sites and woodland habitats. NWT requests:	The Applicant confirms that there would be no loss of ancient or high-quality hedgerows. Veteran hedgerow H52 at CRC9 will be safeguarded by indicative Avoidance Area, where trenchless techniques will be used to minimise impacts and secured through the Outline CEMP [APP-196]. The proposed implementation, management and monitoring of the landscape measures including hedgerows replanting is outlined in the Outline LEMP [APP-199]. A detailed LEMP will be submitted to and approved by the relevant planning authority prior to implementation of the Scheme as secured by Requirement 7 of the Draft DCO [AS-032]. This LEMP will be substantially in accordance with the Outline LEMP, including the objectives, prescriptions and targets set out.

ID	Theme	Representation	Applicant's Response
		- Confirmation that no ancient or species-rich hedgerows will be removed, even temporarily; - Additional safeguards for veteran hedgerows; Detailed restoration specifications and monitoring requirements for all temporary removals.	
NWT-020	Ecology and Biodiversity	Lowland Fen Habitat The ES identifies approximately 0.72ha of irreplaceable lowland fen habitat within the study area, including habitat associated with Fritton Grange Meadows CWS and the Hempnall Beck corridor. Lowland fen is an irreplaceable habitat and is highly sensitive to hydrological change, groundwater disturbance, compaction and pollution. Although the applicant states that HDD will pass beneath the fen at a depth of at least 5m, insufficient evidence has been provided to demonstrate that construction activities will not affect groundwater conditions or the hydrological processes upon which the fen depends.	Where trenchless crossings interact with sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required, as secured within the Outline CEMP [APP-196]. Pollution management measures are contained within and secured through the Outline CEMP [APP-196]. A Water Management Plan (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. This will be based on a combination of visual observations and reviews of the Environment Agency's automatic water quality monitoring network. Method Statement 7: <i>Precautionary Horizontal Directional Drilling (HDD) Methodology</i> located within ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-

ID	Theme	Representation	Applicant's Response
		NWT considers that additional hydrogeological evidence and monitoring commitments are required to demonstrate no adverse effect on lowland fen habitat during construction or operation.	161] includes protection measures to avoid/minimise effects to Hempnall Brook (and its associated lowland fen habitat) from these associated HDD works. Further details regarding the embedded avoidance and mitigation measures associated with the HDD operations are provided within the Outline Cable Route Construction Statement [App-216].
NWT-021	Ecology and Biodiversity	Farmland birds and open countryside species NWT is concerned that the assessment may understate impacts upon farmland bird assemblages associated with the extensive conversion of agricultural land to solar infrastructure. Whilst the Applicant predicts beneficial effects for some breeding bird species following habitat management measures, the Examination should carefully test the evidence supporting those conclusions. The Scheme would introduce extensive panel arrays, perimeter fencing, inverter stations, substations, internal access tracks and associated infrastructure across a large rural landscape.	The majority of land on which the scheme will be sited is currently used for intensive agriculture, specifically cereal production, which is of negligible importance for most species recorded, except skylark. The majority of suitable habitat for nesting species is primarily hedgerows, ditches and woodland, pond edges and uncultivated margins which will be safeguarded by the provisions set out in Design Principles, Parameters and Commitments [APP-213], specifically the establishment of buffers, and further protected by safeguards in the Outline CEMP [APP-196], the Outline OEMP [APP-197] and the Outline DEMP [APP-198]. Marginal habitats will be enhanced for biodiversity with planting and management improving availability, species diversity and hedgerow complexity. This will improve nesting success and

ID	Theme	Representation	Applicant's Response
		NWT considers that ecological responses by farmland birds are often complex and cannot be assumed solely through habitat creation proposals. The Examination should therefore consider: • displacement effects; • loss of functional foraging habitat; • impacts on wintering bird assemblages; • long-term habitat management requirements; monitoring arrangements and trigger mechanisms should predicted outcomes not be achieved.	likely fledgling survival but also offer cover and food resources during the non-breeding season. The Outline LEMP [APP-199] which will support the establishment and better management of grasslands, including that under solar arrays, will also provide food and cover for birds during the non-breeding season. <i>Method Statement 9: Avoidance of Impacts on Skylark (and other ground nesting birds) located within ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161].</i> This document includes a mitigation and compensation strategy which will incorporate a package of measures in order to provide continuous opportunities for breeding birds across the site. Measures will include the following: • Provision of new managed open grassland areas providing specific opportunities for ground nesting species; • Favourable management of grassland margins and associated habitats which will provide increased foraging value and therefore raised carrying capacity across the site as a whole for these species; and • Incorporation of Skylark plots within retained arable land located within the Order Limits.

ID	Theme	Representation	Applicant's Response
			Some skylarks which do make use of expansive agricultural areas will lose nesting habitat as a result of the solar arrays. However, scientific research outlined in Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] identifies the benefits of solar farms due to land use change and the cessation of intensive agricultural practices (e.g. pesticide spraying) leading to better foraging opportunities through increases in food abundance. 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 solar PV developments can be significantly beneficial for farmland bird species.
NWT-022	Ecology and Biodiversity	White-clawed crayfish We are aware of records from Norfolk Rivers Trust of white-clawed crayfish in	No records of white-clawed crayfish have been identified within the Order Limits while ES Volume 3, Appendix 8.9 - Aquatic Habitat Assessment Report [APP-160] concludes that

ID	Theme	Representation	Applicant's Response
		the Tas within 2KM of the scheme. We recommend that further surveys are undertaken by the applicant to determine whether this species is present and that appropriate biosecurity, pollution prevention and sediment control measures are needed to safeguard downstream habitats.	given the habitats present, this species is unlikely to be present. Nevertheless, the Outline CEMP [APP-196], which will rely on trenchless methods and in accordance with the Outline Cable Route Construction Statement [APP-216] will mitigate any impacts through stand-off distances from the waters' edge and the implementation of pollution controls to protect all species which may occupy watercourses. Method Statement 7: <i>Precautionary Horizontal Directional Drilling (HDD) Methodology</i> located within ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] includes protection measures to avoid/minimise effects to watercourses and associated species. Notwithstanding, the Applicant notes the Examining Authority's (ExA) 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]. The Applicant will provide an update on this at Procedural Deadline A.
NWT-023	Ecology and Biodiversity	Protected species	The embedded design principles adopted and detailed within Design Principles, Parameters

ID	Theme	Representation	Applicant's Response
		The ecological documentation identifies the potential presence of a range of protected species requiring mitigation and management. NWT is concerned regarding the extent to which ecological safeguards are deferred to post-consent stages. The Examination should consider whether sufficient information has been provided to demonstrate that: - protected species impacts can be adequately avoided; - mitigation is deliverable; - licensing requirements can be satisfied; - ecological functionality will be maintained throughout phased construction. NWT considers that the DCO should secure robust ecological controls through Requirements rather than relying excessively upon future approvals.	and Commitments [APP-213] (as illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]) has minimised impacts to protected species identified in Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] as part of the evolution of the Scheme. The inclusion of buffers to protect sensitive habitats such as ancient woodland, trees, hedgerows, ponds, watercourses and ditches, as well as the adoption of measures set out in the Outline CEMP [APP-196], the Outline OEMP [APP-197], and the Outline DEMP [APP-198], which will be secured by the Draft DCO [AS-032] will both serve to safeguard protected species and comply with wildlife legislation throughout construction and for the lifetime of the Project. Where works may have an impact on species, this will be addressed by method statements in accordance with the Outline Protected Species Mitigation Strategy (OPSMS) [APP-161] working under Class licences, or direct supervision by an Ecological Clerk of Works (ECoW), based on the current ecological baseline it is considered that there is no requirement for formal mitigation licences obtained from Natural England, if this changes (for example during pre-commencement

ID	Theme	Representation	Applicant's Response
			surveys), the appropriate species-specific licensing can be applied for and obtained at that time. Through the adherence to measures in the Outline CEMP [APP-196], the Outline OEMP [APP-197], and the Outline DEMP [APP-198] and adopting the measures in the Outline LEMP [APP-199] to maximise the benefits for biodiversity, the functionality of the landscape will be maintained and enhanced.
NWT-024	Ecology and Biodiversity	Grassland Management The applicant proposes management of grassland beneath and around solar arrays through mowing, with grazing to be explored during operation. NWT considers that appropriately managed conservation grazing would generally provide greater biodiversity benefits than mowing alone and requests that grazing is prioritised where site conditions permit.	The Applicant has considered the opportunities for grazing as part of the Outline LEMP [APP-199] and this will be undertaken where appropriate and possible.
NWT-025	Biodiversity Net Gain	Biodiversity Net Gain and Habitat enhancement	Although there is no legislative requirement to deliver quantifiable BNG for NSIPs submitted before the 2 November 2026, the Applicant has provided outline commitments in Requirement 9 of

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		NWT welcomes the Applicant's stated commitment to biodiversity enhancement, particularly habitat creation, hedgerow enhancement, watercourse improvements, restoration of ghost ponds, skylark mitigation measures and potential use of locally sourced green hay and local seed sources. However, biodiversity enhancement claims require careful scrutiny where developments are proposed over extensive areas and operational lifetimes extending to approximately 60 years. NWT notes that biodiversity metrics do not fully account for temporal losses of ecological function during habitat establishment periods. This is particularly relevant for bats and other species dependent on mature hedgerows and connected habitat networks.	the Draft DCO [AS-032] and as part of the Outline LEMP [APP-199] which are supported by the Biodiversity Net Gain Report [APP-218] and supported by the use of the Biodiversity Net Gain Statutory Metric [APP-219]. While it will take time for habitats to become established, there is no intention to remove existing large areas of habitats of ecological value (e.g. trees, woodland, hedges, ponds, watercourses and field margins) and these will be retained and enhanced in line with the embedded mitigation Design Principles, Parameters and Commitments [APP-213] and ES Volume 2, Figure 4.1- Indicative Masterplan [APP-059]. Much of the habitat which will be lost is intensively farmed agricultural land, although some will be retained for species specific mitigation (e.g. skylarks). The cessation of farming activities, such as hedge-cutting, ploughing to field edges and the application of pesticides should deliver benefits to a range of species which utilise hedgerows within the short-term. Table 4.1 in the Outline LEMP [APP-199] provides proposed management prescriptions and monitoring activities specific to various landscape/ecological features. This approach will

ID	Theme	Representation	Applicant's Response
			support the delivery of enhanced landscape features which will be of benefit to species.
NWT-026	Biodiversity Net Gain	NWT considers that Examination should focus on: • baseline habitat condition assessments; • biodiversity metric assumptions; • habitat distinctiveness scores; • management prescriptions; • habitat establishment success criteria; • ecological monitoring periods; • adaptive management mechanisms; long-term governance arrangements.	The Applicant acknowledges NWT examination request, although there is no legislative requirement for the Scheme to provide quantifiable BNG. Nonetheless to demonstrate its commitment to delivering a Scheme which will deliver benefits to biodiversity, not just through the embedded design principles set out in Design Principles, Parameters and Commitments [APP-213] (illustrated on the ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]), the Applicant has provided details on baseline habitats and those which it aims to create and retain within the Biodiversity Net Gain Report [APP-218] and supported by the use of the Biodiversity Net Gain Statutory Metric [APP-219]. Requirement 9 of the DCO secures a commitment to a minimum of 10% BNG. Albeit, the BNG Assessment identifies that the Scheme is able to deliver a 37.42% gain for habitats, 31.35% for hedgerows and 16.08% for watercourses. Management prescriptions and a monitoring programme to support the delivery of BNG are set out in Table 4.1 of the Outline LEMP [APP-199].

ID	Theme	Representation	Applicant's Response
NWT-027	Biodiversity Net Gain	NWT is particularly concerned that predicted biodiversity gains may rely heavily upon future habitat condition improvements which can be difficult to secure in practice without robust monitoring and intervention mechanisms. NWT therefore seeks: • Stronger commitments to early habitat establishment; • Monitoring and adaptive management provisions; Demonstration that habitat functionality will be maintained throughout construction and operation.	There are a number of measures embedded within the Scheme as per the Design Principles, Parameters and Commitments [APP-213], which will support the delivery of biodiversity gains. These include of stand-off distances and buffers along the edges of sensitive habitats (woodlands, trees, hedgerows, ponds and watercourses) which will be subsequently reinforced and enhanced in accordance with the Outline LEMP [APP-199]. As these buffers will be protected during construction in accordance with the Outline CEMP [APP-196] it is likely that establishment will occur early in the lifetime of the project and support with the attainment of values presented in the Biodiversity Net Gain Report [APP-218]. A LEMP will be 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 a Draft DCO [AS-032], which will include a detailed monitoring schedule.
NWT-028	Cumulative Impact	Cumulative effects NWT does not consider that cumulative ecological effects can be dismissed lightly. Norfolk is currently experiencing increasing pressure from major energy, grid and infrastructure proposals.	The Applicant acknowledges the pressure of the continued development of energy projects in Norfolk. Notwithstanding this, the assessment of cumulative effects should be based on the 'best available' information, which at the time of writing is the information provided in Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116].

ID	Theme	Representation	Applicant's Response
		- Whilst individual projects may conclude that impacts are limited, cumulative effects may arise through: - progressive loss of farmland habitat; - fragmentation of ecological networks; - degradation of bat commuting landscapes; - pressures upon protected species populations; - reduction in landscape-scale habitat permeability. NWT considers that cumulative effects on bats are of particular importance given the Applicant's identification of a nationally important assemblage and the dependence of many species upon extensive connected landscapes.	However, the Design Principles, Parameters and Commitments [APP-199] which retain and enhance important ecological features such as woodland, hedges and watercourses, as well as safeguards during construction, operation and decommissioning (Outline CEMP [APP-196], the Outline OEMP [APP-197] and the Outline DEMP [APP-198]) will keep ecological networks in place. As per the Outline LEMP [APP-199] these features will be enhanced and supported with new planting to promote bat use as well as being intrinsic to the ecology of other species (e.g. breeding birds). With reference to bats and based on the assessment in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], the operation of this Scheme would be positive for roosting, foraging and commuting bats.
NWT-029	Agricultural Land and Soils	Failure to avoid Best and Most Versatile Agricultural land We note that approximately 80% of the land within the red line boundary falls is categorised as ALC grades 1 to 3a	The use of land of BMV quality is not prohibited. An assessment of the effects on soils and agricultural land is set out in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], including an assessment against planning policy. There is not a presumption against the use

ID	Theme	Representation	Applicant's Response
		(Table 15.6). UK planning policy directs ground-mounted solar farms away from "Best and Most Versatile" (BMV) agricultural land and developers are expected to prioritise brownfield, industrial, or lower-quality land (Grades 3b, 4, and 5). Our position statement is that there should be a presumption against the use of BMV land for solar farms.	of BMV in policy, but NWT's position statement is noted. Non-BMV land was considered during site selection, along with previously developed land and rooftops, as reported in the Site Selection Assessment [APP-215]. As set out in the Statement of Need [APP-206], while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. No suitable brownfield sites of sufficient area for a 500MW utility-scale solar project were identified. As set out within the Site Selection Assessment [APP-215], it was concluded that none of the non-BMV potential development areas were considered to be suitable for the Scheme. During the design evolution of the Scheme, consideration was given to reducing the impact on BMV quality land, as far as practicable, as described in the Design Approach Document [APP-212].
NWT-030	Consultation and Engagement	Proposal for an Ecology Stakeholder Group	The Applicant acknowledges the proposal by NWT to create an Ecology Stakeholder Group and welcomes ongoing engagement on this matter.

ID	Theme	Representation	Applicant's Response
		Considering the significant complexities involved in ensuring the mitigation and compensation habitats proposed for this scheme meet the required outcomes, we propose that an Ecological Stakeholder group is set up, to advise on the scheme's design and ongoing management of ecological areas and be reactive to monitoring data and difficulties in habitat establishment on site.	
NWT-031	Outline Landscape and Ecology Management Plan	Monitoring and Adaptive Management The Outline Landscape and Ecology Management Plan includes ecological monitoring proposals but does not appear to include specific monitoring of barbastelle bats or wider bat assemblages. NWT requests that the final management plan includes: - Bat monitoring before, during and after construction; - Monitoring of barbastelle commuting routes;	Table 4.1 in the Outline LEMP [APP-199] provides proposed management prescriptions and monitoring activities specific to various landscape/ecological features, but also for bat boxes which will be inspected annually for crevice dwelling species including barbastelle bat. During construction the Outline CEMP [APP-196] has a requirement to produce method statements for Horizontal Directional Drilling (HDD) techniques which will be in accordance with the Design Principles, Parameters and Commitments [APP-213] and have a minimum of 5m depth below the surveyed bed of main rivers or a maximum depth of 12m below ground level dependent on ground conditions for individual trenchless bores. The design principles require a buffer of 30m from Country Wildlife Sites / SSSIs

ID	Theme	Representation	Applicant's Response
		- Monitoring of fen hydrology where HDD works occur nearby; - Monitoring of habitat establishment and restoration success; Adaptive management measures should monitoring identify adverse effects.	and a minimum distance of 10m from rivers, watercourses or ditches such that impacts can be avoided. Nonetheless, the Applicant acknowledges the opportunity to monitor fen hydrology on completion of HDD works. As ancient woodland, trees with potential roost features, ditches and hedgerows are being protected during construction, in line with the Outline CEMP [APP-196] there will be no loss of roosts due to the Scheme. Further, additional planting and the enhancement of habitat networks (hedges and ditches) will support the movement of barbastelle bats across the landscape.
NWT-032	Concluding remarks	Conclusion NWT supports the transition to renewable energy and acknowledges the role solar energy can play in addressing climate change. However, NWT considers that the application raises significant ecological issues requiring detailed examination. In particular, NWT considers that the implications of the Scheme for bats, habitat connectivity, farmland	The Applicant acknowledges the advice of NWT regarding the Examination. The Applicant is satisfied that the assessment set out in Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] is robust and relies on information gathered from detailed surveys of habitats and protected species which have been carried out by suitably qualified staff and in accordance with current guidelines and best practice. The Applicant has incorporated embedded mitigation through a variety of design principals in Design Principles, Parameters and Commitments [APP-213] to minimise impacts to

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		biodiversity and long-term ecological function have not yet been demonstrated with sufficient certainty. NWT therefore requests that the Examining Authority gives careful consideration to these matters during Examination and enables detailed scrutiny of ecological evidence, mitigation measures, biodiversity enhancement proposals and Draft DCO provisions before any recommendation is made regarding consent.	environmental receptors, while incorporating a number of structured and considered measures to protect habitats and species during all stages of the Project via the Outline CEMP [APP-196], the Outline OEMP [APP-197] and the Outline DEMP [APP-198]. Specifically, a number of stand-off distances will be applied when working near ancient woodland, woodland and trees, hedgerows, watercourses, ponds and ditches. The approach to ensuring protected species are safeguarded has been set out in the Outline Protected Species Mitigation Strategy [APP-161] which includes licence requirements, method statements and the appointment of an Ecological Clerk of Works. While quantifiable net gains are not required for this project, the Applicant has sought to provide details on its approach to habitat creation and enhancement in a Biodiversity Net Gain Report [APP-218] compliant with the Biodiversity Net Gain Statutory Metric [APP-29]. The opportunity to deliver benefits to nature may amount to a 37.42% gain for habitats, 31.35% for hedgerows and 16.08% for watercourses. How and where these habitats will be located within the Order Limits is presented in the Outline LEMP [APP-

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			199] which includes detailed prescriptions and a management programme for the duration of the establishment phase.