



East Pye Solar
The Applicant's Response to Relevant
Representations Part 3: Other Statutory Bodies,
Undertakers and Notable Parties

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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 This document provides the Applicant's response to the Relevant Representations (RRs) submitted by statutory parties, undertakers and notable parties that are not responded to in **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 [EN0110014EXAM/8.7]**.
- 1.1.3 The period for registering as an Interested Party through the submission of a 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.
- 1.1.4 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 (1 September 2026):
- **The Applicant's Response to Relevant Representations Part 1: Host and Neighbouring Local Authorities [EN0110014EXAM/8.6];**
 - **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 [EN0110014EXAM/8.7];**
 - **The Applicant's Response to Relevant Representations Part 4: Parish and Town Councils and Parish Councils [EN0110014EXAM/8.9];** and
 - **The Applicant's Response to Relevant Representations Part 5: By Theme [EN0110014EXAM/8.10].**

1.2 Structure of the Report

- 1.2.1 This document provides a response from the Applicant to the matters raised in the RR and is structured as follows:
- **Table 1.1** sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding to RRs. The wider range of acronyms used by the Applicant can be found in the **Contents, Glossary and Abbreviations [APP-036]**.
 - **Table 1.2** lists the statutory consultees, undertakers and notable parties that have submitted RRs and are not responded to in the **Applicant's Response to Relevant Representations Part 2 [EN0110014/EXAM/8.7]**. 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

Reference	Submission Document
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
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 Organisations whose Relevant Representations are Responded to in this document

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
RR-0166	AGMCH	Not included in the Book of Reference	Aslacton and Great Moulton Coronation Hall
RR-0189	BEPSCGM	N/A	BEPS – Great Moulton
RR-0200	BEPS	N/A	Block East Pye Solar (BEPS)
RR-0380	CJC	N/A	Councillor John Cook
RR-1016	KC	N/A	Councillor Karl Catchpole
RR-1898	SW	N/A	Councillor Suzanne Wateridge
RR-0382	CPRE	N/A	CPRE Norfolk
RR-0604	FC	N/A	Forestry Commission
RR-0605	FNM	N/A	Forncett Nature Matters
RR-0705	GMAG	N/A	Great Moulton Action Group
RR-0706	GMEC	N/A	Great Moulton Evangelical Chapel
RR-1407	LAND	N/A	Lincolnshire Against Needless Destruction

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
RR-1455	OESL	N/A	Oakridge Environmental Services Ltd
RR-1746	SUC	03-001	Saxlingham United Charities
RR-1768	SAG	N/A	Shotesham Action Group
RR-1769	SCT	N/A	Shotesham Common Trustees
RR-1770	SCG	N/A	Shotesham Conservation Group
RR-1796	SNTWN	N/A	South Norfolk Tree Warden Network
RR-1907	TVCSF	N/A	Tas Valley Church Schools Federation
RR-1916	CTEPC	N/A	The Church & Town Estates Property Charity
RR-1919	LF	N/A	The Lord Fuller OBE
RR-1921	TRNA	N/A	The Ramblers – Norfolk Area
RR-1980	UKHSA	N/A	UK Health Security Agency
RR-2005	WVR	N/A	Waveney Valley Reform
RR-2022	WRG	N/A	Wood Green Residents Group

2 The Applicant's Response to Other Statutory Bodies, Undertakers and Notable Parties

2.1 Aslacton and Great Moulton Coronation Hall

Table 2.1 Applicant's response to Aslacton and Great Moulton Coronation Hall [\[RR-0166\]](#)

ID	Theme	Representation	Applicant's Response
AGMCH-001	General comments	Aslacton and Great Moulton Coronation Hall objects to the East Pye Solar Scheme due to its severe, disproportionate impacts on our essential community hub, local road safety, and rural infrastructure. As an independent charity serving two rural villages, the Coronation Hall is a lifeline for many residents in Great Moulton and Aslacton. Crucially, the Hall receives absolutely no public funding; we are entirely self-funded, relying solely on the revenue we generate ourselves to survive. Furthermore, we act as a vital economic engine for the wider community, hosting numerous charity events each year to raise critical funds for other charitable causes.	The Applicant notes this comment and has provided responses to specific comments made by Aslacton and Great Moulton Coronation Hall below.
AGMCH-002	Scheme Description	While we support the principle of green energy, this industrial-scale project represents the wrong development in the wrong place.	The Applicant acknowledges the support for the principle of green energy.

ID	Theme	Representation	Applicant's Response
	Site Selection, Alternatives and Design Evolution		Evidence for the need for the Scheme is set out in the Statement of Need [APP-206]. Factors considered in the site selection process are given in the Site Selection Assessment [APP-215]. This includes consideration of planning, environmental and operational factors in the search for suitable sites, notably including the existence of suitable and available land, suitable irradiation and grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3. Consideration has included both technical constraints (i.e. proximity to grid connection, site size, compatibility of land uses) and consideration of the avoidance and reduction of environmental impacts by excluding ecological, landscape and heritage designations. The design evolution of the Scheme, as summarised in the Design Approach Document [APP-212], has sought to avoid and/or reduce environmental impacts as far as practicable through the design process. The NPS EN-1 recognises that any reduction in the scale of energy infrastructure, to mitigate adverse effects, may result in a significant operational constraint or reduction in function. The Scheme

ID	Theme	Representation	Applicant's Response
			has been designed to maximise the energy generation benefit from the available land and the grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects, as far as practicable. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. The Site Selection Assessment [APP-215] concludes that there are no locations within the search area that are more suitable and available than the proposed location for the Scheme, based on the criteria identified for site selection. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
AGMCH-003	Scheme Description	The cluster of infrastructure planned south of Great Moulton—including the massive Battery Energy Storage System (BESS) and the National Grid Substation on adjacent sites—	ES Volume 1, Chapter 14 – Socio-Economics [APP-050] assesses socio-economic effects for each phase of the Scheme. These are summarised in Table 14.28. Significant effects identified are Major or Moderate Beneficial impacts on jobs in

ID	Theme	Representation	Applicant's Response
		directly threatens the financial viability and physical survival of our community asset.	South Norfolk in the Construction Phase and Decommissioning Phase, and on Skills and the Labour Market in all three phases. No significant adverse effects are identified, with the temporary accommodation market and the tourism industry assessed. The Outline BSMP [APP-200] outlines the key fire safety provisions for the BESS, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. The Applicant is committed for the BESS Containers to be a minimum of 200m from residential properties, as set out in the Design Principles, Parameters and Commitments [APP-213]. By way of Requirement 6 of the Draft DCO [AS-032], prior to the commencement of construction of the BESS, the Applicant will require a BSMP to be submitted to and approved by the relevant planning authority that must consult with Norfolk Fire and Rescue Service and the Environment Agency. The landscape and visual effects of the BESS Site and National Grid Substation south of Great Moulton have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043], with mitigation measures secured through the

ID	Theme	Representation	Applicant's Response
			Outline LEMP [APP-199] and Requirement 7 of the Draft DCO [AS-032] .
AGMCH-004	Socio-Economics	Severe Impact on Community Amenity and Direct Threat to Financial Survival The Coronation Hall sits directly at the heart of the villages facing the highest concentration of the scheme's heavy infrastructure. Because we receive no external funding, any disruption to our operations poses an immediate, existential threat to our existence.	The Applicant refers to its response to AGMCH-005.
AGMCH-005	Landscape and Visual Socio-Economics	Loss of Vital Revenue Streams: Our hall relies heavily on its quiet, rural charm to host weddings, family celebrations, and local events. Surrounding this vibrant community hub with an industrial landscape of 3.5-to-4.5-metre-high solar tracking arrays and substations will severely diminish its visual appeal. This will result in an immediate drop in bookings, stripping us of the rental income required to keep the building open.	The Applicant notes the importance of visual amenity to Aslacton and Great Moulton Coronation Hall. Based on the Zone of Theoretical Visibility study presented in ES Volume 2, Figure 7.5.10 Site 1 Zone of Theoretical Visibility [APP-079] , the Coronation Hall is predicted to have limited visibility of the Scheme, as it is located to the north of Great Moulton. The study indicates that the existing vegetation and built form within Great Moulton provide an effective visual screen between the Coronation Hall and the Scheme.
AGMCH-006	Human Health Socio-Economics	Disruption to Well-being and Charity Groups: We host regular, heavily attended community sessions including Yoga, Pilates, and high-energy Zumba groups. The continuous low-	Aslacton & Great Moulton Coronation Hall sits outside of the study area of the noise and vibration assessment presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] .

ID	Theme	Representation	Applicant's Response
	Noise and Vibration	frequency hum generated by the adjacent BESS cooling fans and high-voltage substations will destroy the peaceful environment required for these wellness activities, forcing groups to relocate and destroying our primary revenue streams.	The receptors most representative of Great Moulton are NSR1A and NSR1B, which are to the south of Great Moulton. Operational effects during the daytime, night-time and early morning are expected to be long-term negligible and not significant, with rating levels being below the background sound levels at NSR1A and NSR1B. These findings are reflected in the Human Health Summary Statement within ES Volume 1: Chapter 18 – Other Environmental Matters (Revision 1) [APP-054], which considers operational noise from the BESS, solar inverters and substations, including low-frequency noise. The assessment concludes that operational noise levels would remain below relevant assessment criteria and that, with embedded mitigation such as low-noise equipment, acoustic enclosures and noise barriers, residual effects would be minor adverse or negligible and not significant. Accordingly, no significant adverse effects on human health from operational noise are anticipated.
AGMCH-007	Socio-Economics	Compounded Damage to Wider Charitable Causes: By disrupting our operations, this scheme directly harms the wider charity	Please refer to our response to AGMCH-003, which details socio-economic impacts assessed

ID	Theme	Representation	Applicant's Response
		sector. The Hall runs many dedicated charity events each year to support and raise funds for other charities. If our facilities are compromised, our ability to host these vital fundraising events will cease, creating a negative ripple effect across multiple charitable organizations.	during all phases and finds no significant adverse effects, but does find significant beneficial effects.
AGMCH-008	Transport and Access	Critical Traffic Risks to Young, Elderly, and Vulnerable Users The local road network, particularly Carr Lane, consists of narrow, single-track country lanes entirely unsuited for heavy commercial construction vehicles.	The Applicant notes the concern regarding potential effects on young, elderly and other vulnerable users of the local highway network. The site parcels closest to Great Moulton comprise Sites 1A-1D and the BESS and would be accessed via the B1134 Station Road and Lodge Road. Construction traffic associated with these areas would not route through Great Moulton and would not use Carr Lane, where Aslacton and Great Moulton Coronation Hall is located. In accordance with the assessment methodology set out in ES Volume 1, Chapter 11 - Transport and Access [APP-047], sensitive receptors and vulnerable road users were given particular consideration. Taking account of the proposed mitigation and management measures, the assessment concluded that the residual effects would be low or negligible. Construction traffic would also be managed in accordance with the Outline CTMP [APP-201], which includes

ID	Theme	Representation	Applicant's Response
			measures designed to maintain highway safety and minimise potential conflicts on the local highway network during the construction period.
AGMCH-009	Transport and Access	Danger to Children and Youth: The hall is a sanctuary for local children. We host a busy Toddler Group and the St John Ambulance Badgers, meaning very young children and youth volunteers are regularly arriving at and leaving the building. Introducing a massive volume of construction traffic onto these lanes creates severe, unacceptable highway safety risks for these vulnerable users walking or cycling to the hall.	The Applicant notes the concern regarding potential effects on children and young people accessing Aslacton and Great Moulton Coronation Hall. Please refer to the Applicant's response to Representation AGMCH-008. As set out therein, construction traffic associated with Sites 1A-1D and the BESS would not route through Great Moulton and would not use Carr Lane, where Aslacton and Great Moulton Coronation Hall is located. Accordingly, construction traffic associated with these areas would not be expected to give rise to direct effects on those accessing the hall. Construction traffic would also be managed in accordance with the Outline CTMP [APP-201], which includes measures to maintain highway safety during the construction period.
AGMCH-010	Transport and Access	Isolation of the Elderly: Our monthly coffee mornings and other events are a critical lifeline against rural isolation for our elderly residents. Carr Lane lacks the physical width and passing places to handle large heavy goods vehicles (HGVs) alongside regular community traffic. Gridlocks during the	The Applicant notes the concern regarding potential effects on elderly residents accessing community facilities within Great Moulton. Please refer to the Applicant's response to Representation AGMCH-008. As set out therein, construction traffic associated with Sites 1A-1D and the BESS

ID	Theme	Representation	Applicant's Response
		intensive, multi-year construction phase will physically cut off our most isolated residents from accessing this primary social support system.	would not route through Great Moulton and would not use Carr Lane. The site parcels closest to Great Moulton would be accessed via the B1134 Station Road and Lodge Road, to the south of the village. Accordingly, construction traffic associated with the Scheme would not be expected to affect access to community facilities within Great Moulton, including those accessed via Carr Lane. Construction traffic would also be managed in accordance with the Outline CTMP [APP-201], which includes measures to maintain highway safety and minimise disruption during the construction period. The Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] recognises that older people and residents in smaller rural communities may be more sensitive to temporary changes in access and connectivity. The assessment therefore considered potential effects on access to services and facilities, road safety, community connectivity and social cohesion. Taking account of the mitigation secured through the Outline CTMP [APP-201] and the findings of the transport assessment, the Human Health Summary Statement concludes that effects on access to

ID	Theme	Representation	Applicant's Response
			local communities and services would be temporary and not significant.
AGMCH-011	Battery Safety	Proximity to a High-Risk Battery Storage System (BESS) The placement of the central BESS cluster directly south of Great Moulton raises profound safety and well-being concerns for our hall users. Safety and Evacuation Weakness: Lithium-ion battery fires are notoriously volatile and emit toxic chemical plumes. With the prevailing winds blowing toward our villages, any thermal runaway event at the BESS would necessitate an immediate evacuation of the Coronation Hall. Operational Liability: As a public venue hosting up to 100 people at a time—including infants at our toddler group and children at Badgers—the lack of a clear, proven emergency containment plan for a BESS fire of this scale places an unacceptable liability on the hall's trustees.	The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The Outline BSMP [APP-200] fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. The safety objectives for the design of the BESS site are listed in Section 1.4 of the Outline BSMP [APP-200]. Section 1.4.2 of the Outline BSMP [APP-200] stipulates: <i>"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire</i>

ID	Theme	Representation	Applicant's Response
			<i>propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> <i>• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i> <i>• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite.”</i> The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in the Outline BSMP [APP-200] in Appendix B: Battery Energy Storage System (BESS) Fire – Emissions to Air Risk Assessment) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements,

ID	Theme	Representation	Applicant's Response
			the selected gases are representative of emissions recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude that the <i>"proposed development should not result in any significant adverse impact on public health."</i> The Plume Study in Appendix B assesses the battery fire emission impacts on air quality at six worst case fire locations (using the illustrative BESS design in Appendix A) on sensitive receptors within a 1km radius of the BESS Site. Typically, a BESS fire would be a relatively short-term incident. The Plume Study therefore compared predicted concentrations against Acute Exposure Guidance Levels (AEGLs) and Emergency Response Planning Guidelines (ERPGs) which are relevant to short term releases, in addition to National Air Quality Objectives (NAQOs). Smoke plumes generated in outdoor BESS fire scenarios can exit through explosion vents in the roof and gases will be transported above the affected BESS in a rising smoke plume. The plume will draw in (entrain) air which dilutes the toxic gases within the plume. Whilst certain toxic gases (including hydrogen fluoride) have a higher molecular weight than air, their behaviour in a fire

ID	Theme	Representation	Applicant's Response
			scenario is governed primarily by release conditions (temperature, turbulence and vertical velocity), rather than molecular weight alone. In addition, hydrogen fluoride is highly reactive and readily interacts with atmospheric moisture, reducing its persistence and potential to accumulate in dangerous concentration levels at a significant distance from the fire source. Large Scale Fire Testing (LSFT) for BESS designs has illustrated that peak flame heights from BESS fire can be 10 metres above ground level which ensures that the generated toxic gas emissions within the smoke plume will decline within the vertical uplift of the plume i.e. every 10m will significantly dilute toxicity. The smoke plume will move more horizontally as a result of the prevailing wind and are further diluted as the smoke plume travels downwind. A stronger wind ensures a more rapid dissipation of toxic gases. Based on the factors of distance to the nearest property and the anticipated short-term nature of a fire incident, the assessment in Appendix B concludes that there will not be adverse effects at the closest residential receptor locations because of a BESS fire incident. Since concentrations are already below health thresholds within 1 km, effects beyond this distance would be even lower, and would not influence the assessment

ID	Theme	Representation	Applicant's Response
			conclusions. The Applicant emphasises that there would be no requirement for the evacuation of Great Moulton Coronation Hall in any credible BESS fire scenario as it is located >1km away from the BESS compound. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 4.4.3 – 4.4.5 of the Outline BSMP [APP-200] stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: <i>“Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.”</i> To validate the final BESS site design, the Applicant has also committed to commissioning an

ID	Theme	Representation	Applicant's Response
			additional Plume Analysis Study at the detailed design stage as stipulated in Section 4.5.13 of the Outline BSMP [APP-200] and secured through the DCO: <i>"at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."</i>
AGMCH-012	Soils and Agriculture	Loss of Local Heritage and Agricultural Community Identity Our charity was founded to celebrate and preserve the deep agricultural heritage of Aslacton and Great Moulton. Eradicating Rural Identity: Replacing over 2,700 acres of high-quality, food-producing farmland with a sea of glass and metal	The comments are noted. There will be only limited areas where there will be a loss of agricultural land, as set out in Table 15.14 of ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051], for permanent fixed infrastructure and for tree planting. For clarity, the total area of Order Limits is 1,212.3 ha (2,996 acres). The Sites, which collectively contain the Solar PV Panels, associated

ID	Theme	Representation	Applicant's Response
		completely alters the character of the community we serve.	infrastructure including Grid Connection Infrastructure, landscaping, heritage, surface water and biodiversity mitigation areas, are 1,054.1ha (2,598 acres). When Site 6 is excluded, which is given over entirely to biodiversity mitigation, the remaining Sites are 1,036.1ha (2,560 acres) in area. Care has been taken to ensure that all land has been used efficiently.
AGMCH-013	Landscape and Visual Socio-Economics	Damage to Community Cohesion: The physical isolation of local homes and the destruction of the open countryside will undermine the mental well-being of our residents. This shifts a heavier burden of social support onto our volunteer-run facility at a time when our own operations are being financially and physically compromised by the project.	The Applicant notes the value of green open space for the local community. The effect on Landscape and Visual Amenity is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Potential mental health and wellbeing effects, particularly for older people and other potentially vulnerable groups, are considered within the Equality Impact Assessment [APP-214]. The assessment recognises that temporary construction effects, including changes to access, traffic, noise, air quality and disruption, may affect mental wellbeing and contribute to feelings of uncertainty within affected communities. Using the Mental Health and Wellbeing Impact Assessment (MWHIA) four-factor framework, the assessment identifies a negative effect on mental wellbeing during construction. However, these effects are expected to be reduced through measures set out in the Outline CEMP [APP-196],

ID	Theme	Representation	Applicant's Response
			Outline CTMP [APP-201], Outline OTMP [APP-202], and Outline Public Rights of Way and Permissive Paths Management Plan [APP-203], together with ongoing community engagement. The assessment concludes that negative equality impacts are not expected to be substantial. During operation, potential mental wellbeing effects are expected to be limited and further reduced through embedded design measures, including landscape screening and the provision of permissive paths, which may also provide wider health and wellbeing benefits.
AGMCH-014	General remarks	Conclusion The Aslacton and Great Moulton Coronation Hall urges the Planning Inspectorate and the Secretary of State to refuse development consent for the East Pye Solar Scheme. Because our charity receives zero external funding, the industrialisation of our immediate surroundings directly threatens our financial survival. The positioning of this infrastructure will cause irreversible damage to our community safety, rural roads, and the long-term survival of our most cherished, self-sustaining community asset.	The need and benefit of the Scheme are set out in the Planning Statement [APP-209] and the Statement of Need [APP-206] and the Applicant has addressed comments from Aslacton and Great Moulton Coronation Hall within this table. The Applicant is committed to providing a Community Benefit Fund, as set out in the Planning Statement [APP-209], to allow for community benefits. The Community Benefit Fund is an optional commitment being made by the Applicant and is not required to mitigate the impacts of the Scheme. Details of the Community Benefit Fund, including its governance, eligibility criteria and distribution arrangements, will be developed in consultation

ID	Theme	Representation	Applicant's Response
			with the relevant local planning authorities. No decisions have been made regarding specific beneficiaries, projects or organisations that may receive funding, and no commitments have been made in this regard.

2.2 BEPS – Great Moulton

Table 2.2 Applicant's Response to BEPS - Great Moulton [\[RR-0189\]](#)

ID	Theme	Representation	Applicant's Response
BEPSG-001	Scheme Description	We object to the East Pye Solar scheme and ask that Great Moulton, Tivetshall and Wacton are identified by name, not obscured within a generic 'cluster' description. The villages form part of the historic Great Moulton Plateau and should be treated as populated rural settlements with established community and heritage context and all application and public-facing documents clearly define the affected 'cluster' as including Great Moulton, Tivetshall and Wacton.	The Applicant acknowledges the individual importance of Great Moulton, Tivetshall and Wacton in their own right. The receptors assessed within the ES are defined on a topic-specific basis and set out within the respective topic chapters [APP-042 to APP-056] . Relevant receptors within settlements and communities are identified where pertinent to the assessment being undertaken. The Applicant considers that the ES provides sufficient information to identify the receptors relevant to each assessment.
BEPSG-002	Scheme Description	The Planning Inspectorate website description should be corrected to reflect the true scale of the scheme, including the National Grid Substation, BESS and three project substations.	The Scheme description provided on the website has been prepared by the Planning Inspectorate. The Applicant has provided a detailed description of the Scheme within ES Volume 1, Chapter 4 – The Scheme [APP-040] which summarises the development as follows ' <i>The Scheme comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station with a total capacity exceeding 100 megawatts (MW) and associated development including a Battery Energy Storage</i>

ID	Theme	Representation	Applicant's Response
			<i>System (BESS), up to three 132 kV Project Substations and up to three 400kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation'.</i>
BEPSG-003	Statement of Need	Statement of Need - APP/7.11 - The Statement of Need relies on broad national solar policy but does not demonstrate a specific need for this scheme in this location. NESO has already prioritised sufficient solar schemes for Clean Power 2030 regional capacity in the relevant Central England and East Anglia transmission areas. - East Pye's claim that the Norwich Main to Bramford overhead line has sufficient capacity should be tested against NESO/NGET evidence and EC5 boundary modelling. - East Pye should explain whether any conclusions depend on the BESS being available, given that the BESS has only Gate 1	The Applicant addresses each point in turn. Bullet point 1: NPS EN-1 states that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established (NPS EN-1, Paras. 3.2.8 – 3.2.10). The energy NPSs also include the government's conclusion that there is a critical national priority for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms such as the Scheme, because a combination of many or all types of such infrastructure is urgently required for both energy security and to achieve net zero (NPS EN-1, Paragraphs. 4.2.16 – 4.2.17). NPS EN-1, when combined with the relevant technology-specific energy NPS, provides the

ID	Theme	Representation	Applicant's Response
		prioritisation and no confirmed connection date.	primary basis for decisions by the Secretary of State for developments that fall within the scope of the NPSs. NPS EN-1 is clear that the overarching need case and the substantial weight to be given to the need is the starting point for all assessments of applications for energy infrastructure types which are covered by the NPSs (NPS EN-1, Paragraph. 4.2.19). Section 7.6 and Section 7.7 of the Statement of Need [APP-206] explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035. Further, the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). The Scheme is needed to contribute to meeting <i>“the urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.”</i> (NPS EN-1, Para 3.3.58). Section 7.3 of the Statement of Need [APP-206] also sets out the challenge to deliver net zero

ID	Theme	Representation	Applicant's Response
			regionally, including the reduction of carbon emissions from transport and other non-electricity sector demand in the region. Section 4.3 of the Statement of Need [APP-206] explains that current levels of national electricity demand are expected to double (NPS EN-1, Para. 2.3.7) to electrify these non-traditional sectors. Regional electricity demand is likely to grow at a similar rate to national demand, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 (Clean Power 2030 Action Plan, Page 11). This underpins the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand. Bullet point 2: Section 7.7 of the Statement of Need [APP-206] also explains that <i>"a large-scale solar development connecting into the existing overhead line between Norwich Main and Bramford provides the potential to help decarbonise electricity demand to the benefit of consumers both locally and nationally."</i> It is the Applicant's understanding that in providing a connection offer to an electricity generator, National Grid are required to carry out robust

ID	Theme	Representation	Applicant's Response
			analysis to ensure that anticipated power flows from the generator can be accommodated as per the connection agreement. The Applicant understands that National Grid have carried out this analysis and that has resulted in the connection agreement being offered and accepted. NESO's re-prioritisation of the Scheme as a Gate 2 Phase 2 project further supports that the grid local to the Scheme can accommodate the Scheme as proposed. Bullet point 3: A BESS is proposed as associated development to the main Solar PV Sites and will support their operation. The benefits arising from the BESS are set out in Sections 5.11, 6.9, and 6.10 of the Statement of Need [APP-206]. Paragraph 6.9.3 of the Statement of Need [APP-206] explains that "Solar schemes may be developed as standalone schemes or may be co-located with storage or other generation technologies. Both standalone and co-located schemes will play essential roles in contributing to the three pillars of energy policy: decarbonisation, security of supply, and affordability." Further to the response made to Bullet Point 1 of this representation, the Energy NPSs strongly support low-carbon generation schemes. NPS EN-

ID	Theme	Representation	Applicant's Response
			1 also provides strong support for flexible assets, such as BESS (for example, paragraphs 3.3.5, 3.3.6, 3.3.25) and NPS EN-3 paragraph 2.10.24 provides that "Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolyzers) to maximise the efficiency of land use." The Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). Upon receiving consent for the Scheme (if granted) the Applicant would re-submit the BESS component of the Scheme to a future re-prioritisation round to seek a Gate 2 connection offer (firm connection date) for the BESS.
BEPSG-004	Draft DCO	Draft Development Consent Order and document reliability The application should not be treated as procedurally reliable without substantial clarification,	The Applicant addresses each point in turn. Bullet point 1: The Applicant's Section 55 checklist [APP-004] demonstrates how the Applicant has complied with the DCO acceptance tests in Section 55 of the Planning Act 2008 and can therefore be considered procedurally reliable.

ID	Theme	Representation	Applicant's Response
		correction and, where necessary, reassessment. • The definitions of 'commence', 'permitted preliminary works' and 'maintain' must be clear, enforceable and limited to works properly assessed in the Environmental Statement. • Inconsistencies in dates, references, terminology, limits of deviation and the number of 400 kV substations should be corrected before weight is given to the submission. • Mitigation relying on outline plans, future discretion or wording such as 'where practicable' should be given limited weight unless made certain and enforceable.	The Applicant would be happy to address any specific concerns regarding document reliability. Bullet point 2: The definition of “commence” has precedent in recently made Solar DCOs including The Fenwick Solar Farm Order 2026 and The Springwell Solar Farm Order 2026. Requirement 13 provides that the permitted preliminary works must be carried out in accordance with the permitted preliminary works environmental management plan. This ensures that such works are suitably controlled. The definition of “maintain” ensures that the Order for the Scheme is entirely consistent with the development proposed and assessed in the Environmental Statement, which includes an assumption that all the Solar PV Panels will be replaced once and that the BESS could be replaced up to five times during the operational phase. The maintenance of the Scheme is only authorised, by virtue of article 5(3), where it is not likely to give rise to any materially new or materially different effects that have not been assessed in the Environmental Statement. Bullet point 3:

ID	Theme	Representation	Applicant's Response
			The examination process is staged which allows corrections to be made to the application documents at each deadline, albeit it is unclear what inconsistencies are being referred to here. For example, there are no 'limits of deviation' sought for East Pye. The Applicant would be happy to address any specific concerns BEPSG has regarding inconsistencies. The scheme includes three 400kV Project Substations and a new 400kV National Grid substation. Bullet point 4: The outline management plans establish a framework for the details to be secured through the DCO Requirements. The qualifying phrases are considered appropriate by the Applicant at this stage given the outline nature of the management plans, the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. For example, the Applicant has sought to retain flexibility around cable routing, vehicular access points and highway visibility requirements, public access to PRow, vegetation retention and removal to reflect the details that will be subject to the detailed design stage. Vegetation removal/pruning and

ID	Theme	Representation	Applicant's Response
			reinstatement will also depend on seasonal considerations, for example. The Applicant has also sought to retain flexibility where the timing of implementing measures will be subject to agreeing details with the relevant planning authority, for example, in relation to the timing for any repairs required as a result of the Scheme in relation to Public Rights of Way and construction haul routes. Further to the above, the specificity will be provided in the detailed management plans, which will be substantially in accordance with these outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032]. The approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032]. Paragraph 2(4) of Schedule 15 to the Draft DCO [AS-032] requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that any mitigation measures identified in the ES are contained in the final plans or an explanation is

ID	Theme	Representation	Applicant's Response
			provided as to why there is a change (for example, if a mitigation measure is no longer required as technology has advanced and the impact will no longer occur).
BEPSG-005	Site Selection and Reasonable Alternatives	Major Infrastructure Hub on Great Moulton Plateau The Great Moulton Plateau is an elevated, open and highly visible rural landscape with homes, public rights of way, historic field patterns and long views. A full like-for-like alternatives assessment is required for landscape, residential amenity, heritage, ecology, agricultural land, cumulative effects and technical deliverability.	The Applicant notes the concerns raised regarding the location of the National Grid Substation, 400kV Project Substation and BESS on the Great Moulton Plateau. Evidence for the need for the Scheme is set out in the Statement of Need [APP-206]. The Site Selection Assessment [APP-215] sets out the approach to site selection and the consideration of potentially reasonable alternative sites adopted, which is proportionate and consistent with national policy. Further detailed responses to the points raised in relation to site selection have been provided in the following rows. NPS EN-1 is clear that site selection work should be undertaken on a proportionate basis and that any alternative would need to be a reasonable alternative (and would be expected to deliver the same capacity in the same timeframes). The Applicant's site selection process and evaluation accords with the approach to the consideration of alternatives set out in NPS EN-1, and the Applicant considers that it has demonstrated

ID	Theme	Representation	Applicant's Response
			compliance with the relevant site selection criteria set out in NPS EN-5. The Applicant's position on the Scheme's compliance with NPS EN-1 and EN-3 is set out within the Policy Compliance Document [APP-210]. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably shows substantial public benefits that outweigh the less substantial harm identified, as set out within the Planning Statement [APP-209]. The consideration of reasonable alternatives is set out in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]. The Applicant draws attention to paragraph 4.3.9 of NPS EN-1, which confirms that from a policy perspective there is no general requirement to consider alternatives or to establish whether a development represents the best option, and paragraph 4.3.22 of NPS EN-1, which provides that the consideration of alternatives should be carried out in a proportionate manner, with only alternatives that meet the objectives of the proposed development being considered.

ID	Theme	Representation	Applicant's Response
BEPSG-006	Site Selection and Reasonable Alternatives	- East Pye has not demonstrated a robust application of National Grid's Horlock Rules or shown that natural landform containment has been properly used before relying on future planting. - The proposed National Grid Substation, BESS and related infrastructure appear to have been sited largely by commercial land agreements and developer convenience rather than least-harm environmental selection.	The Applicant's approach to the site selection of the National Grid Substation is set out within the Site Selection Assessment [APP-215], which had regard to the Horlock Rules. In line with the Horlock rules, the siting of the National Grid Substation has avoided internationally and nationally designated areas of the highest amenity, cultural, or scientific value, and areas of local amenity value such as ancient woodlands. The National Grid Substation is located within the Great Moulton Plateau Farmland LCA, which is described as an area of elevated plateau above the 50m contour with the flatness of the plateau landform and lack of enclosure affording a strong sense of openness with expansive skies and distant views. Limited opportunities in citing the Horlock rules '<i>to take advantage of the screening provided by landform</i>' exist in this landscape character area, however the design process identified opportunities for '<i>existing features</i>' to provide landscape screening within Sub-Site 1B through the use of existing boundary vegetation in line with the Horlock rules. The Design Approach Document [APP-212] further sets out the refinement of the location of the National Grid Substation from the options presented at Statutory Consultation.

ID	Theme	Representation	Applicant's Response
			As set out within the Site Selection Assessment, the criteria required for a new National Grid Substation, for example accessibility from the Strategic Road Network, were also important considerations for the locations of the BESS. Locating the BESS in proximity to the National Grid Substation minimises the spatial distribution of the taller elements of the Scheme across the greater geographical area of the Sites. The BESS Site was selected on the basis of its proximity to the PoC and access from Station Road, and with consideration of minimising landscape and visual, heritage and noise impacts from the BESS as far as practicable.
BEPSG-007	Noise and Vibration	Noise from the National Grid Substation, project substations, BESS, inverters and solar infrastructure should be assessed using site-specific baseline monitoring, night-time LA90 data and BS 4142-compliant cumulative modelling. Given the proximity to homes, the Applicant should demonstrate that operational noise, low-frequency hum, tonal components and lighting/security impacts will not cause significant adverse effects.	Noise from the National Grid Substation, project substations, BESS, inverters and solar infrastructure have been assessed using site-specific baseline monitoring, night-time LA90 data and BS 4142 compliant modelling. The assessment also considers low frequency noise and tonal components. The assessment is presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The assessment demonstrates that there will be no significant residual adverse effects.

ID	Theme	Representation	Applicant's Response
			The Equality Impact Assessment [APP-214] considers potential effects on mental health and wellbeing arising from factors such as noise and lighting. Using the Mental Health and Wellbeing Impact Assessment (MWHIA) four-factor framework, it recognises that some groups, including older people, disabled people, neurodivergent people, children, carers and people with pre-existing health conditions, may be more sensitive to these effects.
BEPSG-008	Soils and Agriculture	Land Use - Best and Most Versatile Agricultural Land We object to locating the most intensive and partly permanent infrastructure on Great Moulton/Tivetshall/Wacton Plateau Best and Most Versatile agricultural land, including confirmed Grade 2 land. National policy expects poorer-quality agricultural land, brownfield, contaminated or industrial land to be preferred where possible, particularly for solar development.	The use of land of BMV quality is not prohibited. The NPS EN-3 at 2.10.137 requires only that the economic and other benefits of BMV be recognised. 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 of BMV in policy. The development takes full account of the inclusion of BMV land and minimises any losses so far as possible, as set out in ES Chapter 15. The areas of BMV that have the potential to be permanently affected (National Grid Substation and pylons; BESS; Project Substations) amount to 37.9 Ha (worst case) as set out in Table 15.14 of ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051].

ID	Theme	Representation	Applicant's Response
			As noted in paragraph 15.8.110 of ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051] ‘<i>Norfolk as a County has an estimated area (from the provisional ALC maps from the 1970s) of the order of 479,000ha of agricultural land. Over 433,000ha of this is Grades 1, 2 and 3a</i>’. Paragraph 15.8.112 states ‘<i>The amount of land within the Order Limits is approximately 0.22% of the land within the County, and 1.2% of South Norfolk agricultural land. This is a negligible quantum on a regional basis. Therefore in terms of the use of BMV land, the regional impact is therefore considered to be negligible, which is not significant</i>’.
BEPSG-009	Soils and Agriculture Decommissioning	The National Grid Substation will not be decommissioned, creating permanent landscape and land-use harm and raising concerns about soil sealing, compaction, restoration and aftercare.	The NG Substation will result in a permanent loss of land, as set out in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051]. The significance of the loss of 6.1 ha of BMV land is assessed as minor adverse and not significant.
BEPSG-010	Soils and Agriculture Decommissioning	East Pye's BMV figures appear inconsistent and should be corrected before the scale of impact is assessed. The Applicant should provide corrected BMV totals by site, distinguish temporary, long-term and permanent losses, and justify hard infrastructure on Grade 2 land.	The figures for the quantities of land by ALC grade are provided in the ES and follow detailed field survey of most of the land excluding the CRC. The BMV totals for land affected, including the distinction between temporary and permanent effects is assessed for all components of the development in ES Volume 1 Chapter 15 – Soils

ID	Theme	Representation	Applicant's Response
		A revised alternatives assessment and enforceable soil handling, protection, restoration, aftercare and decommissioning commitments are required.	and Agricultural Land [APP-051]. The impacts are set out in Table 15.14 by area and ALC grade. The likely effect is assessed as minor adverse for the permanent loss of land for the National Grid Substation which is not significant. A worst-case assessment is also included paragraph 15.8.66 of ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051]. An Outline Soil Resource Management Plan [APP-204] is provided. A detailed SRMP will be required pre-construction and can be secured by DCO Requirement. The Applicant draws attention to paragraph 4.3.9 of NPS EN-1, which confirms that from a policy perspective there is no general requirement to consider alternatives or to establish whether a development represents the best option, and paragraph 4.3.22 of NPS EN-1, which provides that the consideration of alternatives should be carried out in a proportionate manner, with only alternatives that meet the objectives of the proposed development being considered. As such, a revised alternatives assessment isn't required.
BEPSG-011	Landscape and Visual	Heritage and landscape The area is a nationally important historic rural landscape with a	The Applicant considers that LVIA presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and supporting appendices has been undertaken in accordance with the appropriate

ID	Theme	Representation	Applicant's Response
		significant concentration of pre-1750 listed buildings. - The scheme would industrialise a tranquil rural landscape over a very large area, affecting lanes, public rights of way, heritage settings and homes. - The visual and landscape harm should be assessed by reference to the lived experience of affected villages and not only by field-by-field or receptor-by-receptor analysis.	guidelines and is robust and appropriate for the assessment of the Scheme. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168], and the Applicant considers that these assessments have been undertaken in accordance with the appropriate legislation, policies and guidelines, best practice and are robust and appropriate for the assessment of the Scheme.
BEPSG-012	Cumulative Impact	Cumulative Impact & Human Rights The scheme would combine substations, a National Grid connection, BESS, solar fields, lighting, security, construction traffic, glint and glare into a major cumulative impact on Great Moulton,	The Applicant acknowledges concerns regarding residential amenity, recreation, tranquillity, dark skies, outlook, mental wellbeing and access to open space. These matters have been assessed within the Equality Impact Assessment [APP-214] and the Human Health Summary Statement in ES Volume 1: Chapter 18 – Other Environmental Matters [APP-054]. Any future application relating to the new National Grid

ID	Theme	Representation	Applicant's Response
		Tivetshall and Wacton and The National Grid Substation may enable further large-scale solar and BESS projects, including Tasway Energy Park, FIELD Battery Storage and PACE Solar, adding to cumulative harm. - Residential amenity, tranquillity, dark skies, outlook, recreation routes and mental wellbeing impacts should be properly assessed. The effect on communities with limited formal recreation space should be recognised, particularly where open countryside and footpaths provide everyday recreation. - The Secretary of State and Planning Inspectorate should consider Article 8, Article 1 Protocol 1 and Article 6 rights when assessing proportionality, property impacts and procedural fairness.	substation would be expected to consider the cumulative effects with the Scheme in accordance with the EIA Regulations. The assessments recognise the potential for temporary construction effects on residential amenity, access to PRow and recreational routes, visual amenity, tranquillity and wellbeing, particularly for nearby residents and more vulnerable groups. They also acknowledge that temporary changes to access and connectivity may have greater effects on people with limited mobility, those without access to a private vehicle, and communities with fewer alternative recreation and open space opportunities. These effects have been assessed using evidence from the relevant Environmental Statement chapters and are addressed through embedded mitigation, including traffic and PRow management, landscape screening, dust and noise controls, and ongoing community engagement. Taking account of these measures, the Human Health Summary Statement concludes that no likely significant adverse residual effects on human health are anticipated, while the Equality Impact Assessment concludes that most effects would be neutral following mitigation, with some beneficial operational effects arising from

ID	Theme	Representation	Applicant's Response
			enhanced permissive paths and improved access to green space. The Applicant notes that consideration of Article 8, Article 1 of the First Protocol and Article 6 rights is a matter for the Secretary of State and Planning Inspectorate as part of the DCO decision-making process. Section 8 of the Statement of Reasons [APP-020] also deals with Human Rights and sets out the Applicant's position in respect of the European Convention on Human Rights (as incorporated by the Human Rights Act 1998). The Equality Impact Assessment and Human Health Summary Statement provide relevant evidence on matters including residential amenity, access and recreation, noise, air quality, visual effects, mental wellbeing, impacts on protected characteristic groups, and consultation undertaken as part of the application process to inform that consideration.
Appendix	Ecology and Biodiversity	Ecology - barbastelle bats The scheme area forms part of a nationally important bat landscape, with barbastelles recorded across the entire area. Peer-reviewed research indicates that ground-mounted solar can reduce bat	The Applicant acknowledges the presence of barbastelle bat <i>Barbastella barbastellus</i> colonies surrounding the Order Limits and has considered the core sustenance zone (CSZ) within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Scheme design primarily utilise intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular ploughing, tilthing,

ID	Theme	Representation	Applicant's Response
		activity through habitat loss and fragmentation. • East Pye should explain how bats can continue to thrive in practice given the scale of solar panels, approximately 1,000 battery containers, substations, lighting and security infrastructure. • The Applicant should provide clear evidence that mitigation will avoid adverse effects on the favourable conservation status of the local barbastelle population.	harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including barbastelle bat maternity roosts). Therefore, land utilised for the Scheme is currently subject to regular disturbance, with the proposals considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-7.18] and illustrated on ES Volume 2, Figure 4.1 Indicative Masterplan [APP-059], include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including barbastelle bats. Of particular note, a minimum 15m buffer will be applied to woodland (non-ancient) and a minimum

ID	Theme	Representation	Applicant's Response
			30m buffer will be applied to all ancient woodland immediately adjacent to the Order Limits, with habitat creation and enhancement within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing to enhanced supporting habitats surrounding woodland parcels for the benefit of barbastelle bats (if present), thereby contributing towards the species favourable conservation status. A buffer zone of 10m will be delivered between hedgerows and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199]. With regard to the comment relating to peer-reviewed research, the Applicant assumes that this comment is received in relation to Tinsley et al., (2023)¹, which claims to show a strong negative effect of Solar PV developments on foraging and commuting bats. However, there are several caveats which suggest that this study is not overly reliable (Do solar farms affect foraging &

¹ Tinsley, E., Froidevaux, J. S. P., Zsebők, S., Szabadi, K. L., & Jones, G. (2023). Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity. *Journal of Applied Ecology*, 60, 752–1762. <https://doi.org/10.1111/1365-2664.14474>

ID	Theme	Representation	Applicant's Response
			commuting bats? - BSG Ecology²), and the findings of this study have been challenged. Conversely, other academic studies have also emerged recently which indicate the benefit of Solar PV sites for bat species. More guidance will be published on bats and solar PV sites, as the Bat Conservation Trust are currently working with Natural Resources Wales to provide a comprehensive synthesis of the available evidence on the interactions between solar energy developments and bat populations. Therefore, currently, there is no wholly reliable evidence to suggest that solar PV sites, present a potentially significant negative impact upon bats when cited within sub-optimal habitats. Nevertheless, as a precautionary measure, the embedded design principles include for minimum buffers between habitats of value to barbastelle bats and solar PV apparatus. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199]. When considering the scale of the Scheme, this will result in a significant amount of gain in linear habitats surrounding the

² BSG Ecology (2026). Do Solar Farms Affect Foraging & Commuting Bats? Accessed: Do solar farms affect foraging & commuting bats? - BSG Ecology

ID	Theme	Representation	Applicant's Response
			Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure.
BEPSG-014	Ecology and Biodiversity	Ecology - Extremely rare assemblages of botany - A specialist botanist has identified the need for full botanical survey work by an appropriately qualified botanist, but this does not appear to have been acknowledged or completed. Hundred Way, Prangle Lane, Lodge Road, Carpenter's Walk and related tracks contain notable botanical interest, including an exceptional Dyer's Greenweed colony. The area reportedly contains the only known local assemblage where Dyer's Greenweed, Sulphur Clover and Spiny Restharrow grow together. - Roadside Nature Reserves on Frith Way, Great Moulton appear not to have been surveyed or properly considered in relation to flora and fauna removal.	An extended habitat survey (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 was no evidence to suggest that further targeted botanical surveys are required. The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including designated sites for nature conservation (including Roadside Nature Reserves (RNR)) and habitats).

ID	Theme	Representation	Applicant's Response
BEPSG-015	Water Environment	Water environment - Cumulative groundwater risk should be treated as a connected system rather than separate technical topics. The project interacts with the same groundwater body that supports Great Moulton's private and surface water environment. - The area lies within the sensitive chalk-stream and chalk aquifer (Waveney) catchment. - Further hydrological and hydrogeological modelling is required to assess pollution, groundwater effects, runoff, trenching, public health and ecological risks.	The Applicant notes the comments on the presence of sensitive water receptors, including private water supplies, groundwater bodies/aquifers (notably that beneath the Great Moulton area) and chalk streams. As set out in Section 9 of ES Volume 3: Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] (with detailed design secured through DCO Requirement 11), the BESS and Substations will have surface water drainage systems which will be lined with an impermeable membrane to prevent runoff from these areas from percolating through to the strata beneath. The solar panels within fields and standalone inverter/converter units have a low pollution risk. The solar panels will be PFAS free and will be cleaned with distilled water as set out in and secured by the Design Principles, Parameters and Commitments [APP-213]. As such, the infrastructure proposed for the Scheme poses no significant pollution risk to the sensitive water receptors in the area. The solar panels will be raised on narrow supports at an appropriate freeboard above the ground/anticipated flood depths and natural ground cover is retained below them in the form of

ID	Theme	Representation	Applicant's Response
			grass/wildflower meadow. Rainfall falling on the panels will disperse onto the ground via various gaps in the panel faces and will percolate into the soil as per the existing drainage regime across the Order Limits. As such, the solar panels will not increase flood risk within the Order Limits or elsewhere. Where trenchless cable crossings interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196].
BEPSG-016	Aviation Electromagnetic Fields	Norfolk Gliding Club - Tibenham Airfield - The infrastructure hub at Site 1 and surrounding solar fields lie within the EFATO safeguarding zone for Tibenham Airfield. - Large structures and construction activity could affect emergency landing corridors, create visual confusion, cause reflectivity issues and disturb airflow, thermals and wind behaviour important to gliding.	The Applicant has provided a response to Norfolk Gliding Club's relevant representation (RR-1452). See the Applicants responses at NGC-001 to NGC-016. The Applicant has assessed the impacts upon Engine Failure After Take-Off (EFATO) and Glider Launch Failure (GLF), thermal updrafts, and wind shear, and turbulence specifically for Tibenham Airfield (High Level Investigative Report [APP-222]). In addition, the Applicant has undertaken consultation with Norfolk Gliding Club, who operate at Tibenham Airfield, to inform the operational sensitivity to determine the impact upon the concerns listed. The assessment

ID	Theme	Representation	Applicant's Response
		The Applicant should consult local aviation operators and provide aviation-specific safety and EMF assessment evidence before conclusions are drawn.	concludes that no significant effect are predicted due to: - The Scheme not significantly reducing the available space for an emergency landing following EFATO and GLF - The weak nature of thermals as a result of wasted energy from solar panels, and the expected vertical separation between pilots in vicinity of the Scheme and the solar panels - The vertical distance between the Scheme and Tibenham Airfield. Electromagnetic fields (EMF) are shown to diminish to negligible levels within a short distance from electrical infrastructure, as presented in ES Volume 3: Appendix 17.1 – High Level Electromagnetic Field Assessment [APP-188]. At most, the EMF is shown to asymptotically reach a negligible level within 100m from the overhead cable of the existing 400kV overhead cable. Given that the distance between Site 1 of the Scheme and Tibenham Airfield is over 1.5km, a significant effect upon aviation activity due to EMF is not predicted.

ID	Theme	Representation	Applicant's Response
BEPSG-017	Battery Safety	Fire Risk and contamination risk - The proposed BESS should be assessed against National Fire Chiefs Council guidance for grid-scale energy storage. The submission lacks clear evidence of non-propagation testing, justified separation distances, quantified firefighting water requirements, toxic plume modelling and contaminated run-off containment. - There is no clear evidence of early engagement with the local Fire and Rescue Service or a site-specific Emergency Response Plan. - Norfolk Fire Service concerns about the National Grid Substation's proximity to housing and Great Moulton residents should be treated as a life-safety objection requiring full assessment.	The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). Section 2 of the Outline BSMP [APP-200] documents the Applicant's engagement and consultation with NFRS. The safety objectives for the design of the BESS site are listed in Section 1.4 of the Outline BSMP [APP-200]. Section 1.4.2 of the Outline BSMP [APP-200] stipulates: "Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);

ID	Theme	Representation	Applicant's Response
			• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite." As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the oBSMP pre-construction requirements (Section 5). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure fire, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. Sections 5.1.3 – 5.1.6 of the Outline BSMP [APP-200] addresses the requisite risk assessments and consequence modelling that address all credible BESS failure events which will be provided at the

ID	Theme	Representation	Applicant's Response
			detailed design stage. The Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in the Outline BSMP [APP-200] Appendix B: Battery Energy Storage System (BESS) Fire – Emissions to Air Risk Assessment) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude that the "<i>proposed development should not result in any significant adverse impact on public health.</i>" The spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT)

ID	Theme	Representation	Applicant's Response
			where no fire propagation occurred; therefore, this is a credible worst-case scenario. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 4.4.3 – 4.4.5 of the Outline BSMP [APP-200] stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: <i>“Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.”</i> The Plume Study in Appendix B assesses the battery fire emission impacts on air quality at six worst case fire locations (using the illustrative BESS design in Appendix A) on sensitive

ID	Theme	Representation	Applicant's Response
			receptors within a 1km radius of the BESS Site. Typically, a BESS fire would be a relatively short-term incident. The Plume Study therefore compared predicted concentrations against Acute Exposure Guidance Levels (AEGLs) and Emergency Response Planning Guidelines (ERPGs) which are relevant to short term releases, in addition to National Air Quality Objectives (NAQOs). Based on the factors of distance to the nearest property and the anticipated short-term nature of a fire incident, the assessment in Appendix B concludes that there will not be significant adverse effects at the closest residential receptor locations because of a BESS fire incident. To validate the final BESS site design, the Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 4.5.13 of the Outline BSMP [APP-200] and secured through the DCO: <i>"at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out),</i>

ID	Theme	Representation	Applicant's Response
			<i>production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."</i> Section 2 of the Outline BSMP [APP-200] documents the Applicant's consultation with NFRS and Section 5 of the Outline BSMP [APP-200] covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Outline BSMP [APP-200] Section 4.5 documents the drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the oBSMP is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable

ID	Theme	Representation	Applicant's Response
			drainage system, capable of retaining firefighting water and rainfall during an incident. The Environment Agency (EA) is a statutory consultee for the Scheme, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A Statement of Common Ground between the Applicant and the EA will be submitted as part of the DCO process. The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032]. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency, prior to the commencement of the works for the BESS. The BSMP will be substantially in accordance with the oBSMP.
BEPSTG-018	General remarks	Conclusion - East Pye must correct errors, resolve inconsistencies and provide missing evidence and modelling. - Further review or reassessment is required for unresolved environmental, siting, agricultural land, cumulative, safety and human impacts. Limited weight should be	The Applicant welcomes continued engagement with stakeholders and community groups throughout the Examination process. The examination process is staged which allows corrections to be made to the application documents at each deadline, albeit it is unclear what errors, inconsistencies, missing evidence and missing modelling are being referred to here. For example, there are no 'limits of deviation' sought for East Pye. The ES [APP-035 to APP-195] provides a comprehensive and detailed

ID	Theme	Representation	Applicant's Response
		given to any assessment or mitigation that remains unclear, inconsistent, unsupported, deferred or dependent on future discretion. The DCO should not be treated as safe or as providing a proper basis for development consent until these matters are resolved.	assessment of the Scheme in accordance with ES Volume 3, Appendix 2.2 - EIA Scoping Opinion received from the Planning Inspectorate. Information relating to the Scheme, including the application documents, is publicly available on the Planning Inspectorate's website. The full suite of application documents can be accessed via the Examination Library, including the Consultation Report [APP-024] and the ES [APP-035 to APP-195]. Interested Parties may review these documents and participate in the Examination in accordance with the procedures set out by the Examining Authority.

2.3 Block East Pye Solar (BEPS)

Table 2.3 Applicant's Response to Block East Pye Solar (BEPS) [[RR-0200](#)]

ID	Theme	Representation	Applicant's Response
Executive Summary			
BEPS-001	General remarks EIA Methodology	Block East Pye Solar (BEPS) is a community action group of concerned residents and businesses, covering the entire area of South Norfolk impacted by the proposed industrial-scale solar scheme, and the wider community beyond. BEPS objects to the East Pye Solar Scheme because its adverse effects are not marginal, temporary or capable of being adequately mitigated.	The Applicant notes the Block East Pye Solar (BEPS) response and has provided detailed responses to the matters raised herein.
BEPS-002	Statement of Need	East Pye Solar would cause serious, and in several respects, unmitigable harm to protected species, hydrologically connected water systems, rural landscape character, heritage settings, best and most versatile agricultural land, residential amenity, aviation interests and affected communities. Those harms are not outweighed by any demonstrated need for this Scheme in this location or region. The application has also been promoted in circumstances which give rise to a serious appearance of bias in relation to the Secretary of State's quasi-judicial decision-making role on this project.	NPS EN-1 states that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established (NPS EN-1, Paras. 3.2.8 – 3.2.10).

ID	Theme	Representation	Applicant's Response
			The energy NPSs also include the government's conclusion that there is a critical national priority for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms such as the Scheme, because a combination of many or all types of such infrastructure is urgently required for both energy security and to achieve net zero (NPS EN-1, Paras. 4.2.16 – 4.2.17). The Applicant confirms that the Scheme has been developed in accordance with all relevant legislation, national policy, and best practice guidance applicable to the DCO process, as demonstrated throughout the DCO Application documentation, including the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. Further, Section 4.3 of the Statement of Need [APP-206] explains that current levels of national electricity demand are expected to double (NPS EN-1, Para. 2.3.7) to electrify these non-traditional sectors. Regional electricity demand is likely to grow at a

ID	Theme	Representation	Applicant's Response
			similar rate to national demand, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 (Clean Power 2030 Action Plan, Page 11). This underpins the need for the Scheme and for other schemes to come forward in the region to meet current and future electricity demand. As set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1, together with the wider planning benefits set out in the Planning Statement [APP-209], including contributions to jobs, employment and

ID	Theme	Representation	Applicant's Response
			the local supply chain, biodiversity net gain, green infrastructure enhancements, and improved public access through new permissive paths and community accessible space.
BEPS-003	Policy compliance	Several of BEPS' objections are not merely matters to be weighed in the ordinary planning balance but are legal gateway issues. The applicant must demonstrate compliance with the Habitats Regulations, European Protected Species duties, Water Framework Directive obligations, Listed Building duties, EIA requirements and Compulsory Acquisition tests. Where the evidence is incomplete, uncertain or deferred, the correct outcome is not to assume mitigation will succeed, but to require the applicant to prove legal compliance.	Compliance with the Habitats Regulations 2017, European Protected Species duties, the Water Framework Directive, statutory heritage duties, the EIA Regulations 2017, and compulsory acquisition tests is demonstrated across the Planning Statement [APP-209] , Policy Compliance Document [APP-210] , Shadow Habitats Regulations Assessment [AS-036] , the ES [APP-032 to APP-195] , and the Statement of Reasons [APP-020] . Mitigation is secured through Requirements in Schedule 2 of the Draft DCO [AS-032] .
BEPS-004	Policy compliance	BEPS therefore submits that the application should be refused development consent on account of the fundamental evidential, procedural and legal deficiencies identified in our full relevant representation (by email).	The Applicant disagrees with this view and has responded to BEPS' Relevant Representation in this document.
BEPS-005	Statement of Need	No demonstrated need for this Scheme in this location or region. BEPS does not dispute the general national policy support for renewable energy. However, generalised	Refer to Applicant's response in row BEPS-002 above.

ID	Theme	Representation	Applicant's Response
		national need is not the same as a demonstrated need for this particular scheme, of this scale, in this location, with these impacts. The applicant's own Statement of Need accepts that prioritised schemes already meet the relevant Clean Power 2030 regional solar capacity ranges for 2031-5. BEPS submits that this is fatal to any claim that East Pye Solar is specifically needed in this location or region.	Section 7.6 and Section 7.7 of the Statement of Need [APP-206] explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035 (i.e. without the Scheme, the national and regional capacity ranges would not be met). However, the Applicant notes that the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). The Applicant disagrees that the prioritisation of schemes to meet the regional solar capacity ranges diminishes the need for any of those prioritised schemes.
BEPS-006	Statement of Need	Furthermore, the Statement of Need also admits that the BESS element is only Gate 1 with no confirmed indicative connection date. NESO has already given gate 2 to three times the national BESS requirement for 2035 and has	A BESS is proposed as associated development to the main Solar PV Sites and will support their operation. The benefits arising from the BESS are

ID	Theme	Representation	Applicant's Response
	Grid Connection	said that further allocations in future application windows are unlikely. The applicant nevertheless relies throughout the Statement of Need on the benefits of co-located storage, flexibility and affordability. In BEPS' submission, that weakens the applicant's attempt to rely on a solar-plus-storage justification for a scheme of this scale and sensitivity. Without the BESS the project does not offer flexibility and is likely to require expensive constraint.	set out in Sections 5.11, 6.9, and 6.10 of the Statement of Need [APP-206]. Paragraph 6.9.3 of the Statement of Need [APP-206] explains that <i>"Solar schemes may be developed as standalone schemes or may be co-located with storage or other generation technologies. Both standalone and co-located schemes will play essential roles in contributing to the three pillars of energy policy: decarbonisation, security of supply, and affordability."</i> Further the Energy NPSs strongly support low-carbon generation schemes. NPS EN-1 also provides strong support for flexible assets, such as BESS (for example, paragraphs 3.3.5, 3.3.6, 3.3.25) and NPS EN-3 paragraph 2.10.24 provides that <i>"Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation,</i>

ID	Theme	Representation	Applicant's Response
			<i>storage, hydrogen electrolyzers) to maximise the efficiency of land use”.</i> Upon receiving consent for the Scheme (if granted) the Applicant would re-submit the BESS component of the Scheme to a future re-prioritisation round to seek a Gate 2 connection offer (firm connection date) for the BESS. Section 7.5 of the Statement of Need [APP-206] explains that the Scheme's proposed point of connection is located well away from areas of the network which may be constrained during high levels of wind generation and concludes that the connection of a large-scale solar scheme in the proposed location is not likely to cause any significant network constraints under either the economy or security criteria for network development and operation. The Statement of Need [APP-206] describes how and why the Scheme addresses all relevant aspects of

ID	Theme	Representation	Applicant's Response
			government policy which support the rapid deployment of low carbon electricity generation at scale, and explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of suitable and available land, suitable irradiation and grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme
BEPS-007	Environmental Effects	The Scheme's harms are location-specific. The applicant has selected a dispersed, sensitive rural landscape containing high existing ecological value, hydrologically connected catchments, protected species constraints, heritage assets, aviation constraints, residential receptors and extensive high-quality agricultural land which has been managed for conservation using public money over many years. These are not impacts which can be treated as generic solar impacts in an industrial farming landscape. They arise because of the particular siting and design of this Scheme.	The Applicant makes note of this response. The likely significant effects of the Scheme on the specific environmental receptors raised have been assessed on a topic-by-topic basis within the ES Volume 1 [APP-036 to APP-056]. The Applicant's approach to site selection, including how the site meets the tests set out in NPS EN-1 and NPS EN-3, is demonstrated in the Site Selection Assessment [APP-215].
BEPS-008	Statement of Need	BEPS' position is that the planning balance is fundamentally adverse. Where a project causes severe, and in some cases, legally protected harms, the applicant	Refer to Applicant's responses in rows BEPS-002 and BEPS-005 above.

ID	Theme	Representation	Applicant's Response
		must do more than rely on abstract general 'national need' or optionality for 'attrition'. It must prove that this particular scheme is needed here and that the harms can lawfully be mitigated. The application fails to do this.	
BEPS-009	Compulsory Acquisition	The absence of a demonstrated site-specific or regional need also undermines the Compulsory Acquisition case. The applicant seeks extensive powers over private land and rights, yet has not shown that this specific land is required for a scheme which is necessary in this region. As the Scheme is one of a number of optional projects in an already sufficient regional pipeline, the interference with private property rights cannot be treated as necessary, proportionate or supported by a compelling case in the public interest. Island Green Power is also promoting The Drovers in South West Norfolk, and already has Trowse Solar Farm operational approx 4.5 miles north of East Pye Solar.	The Applicant refers to its response to row BEPS-002 above. Further, Section 7.6 and Section 7.7 of the Statement of Need [APP-206] explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035. Further, the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Para. 3.2.6). Section 4.3 of the Statement of Need explains that current levels of national electricity demand are expected to double (NPS EN-1, Para. 2.3.7) to electrify these non-traditional sectors. Regional electricity demand is likely to grow at a similar rate to national

ID	Theme	Representation	Applicant's Response
			demand, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 (Clean Power 2030 Action Plan, Page 11). This underpins the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand In relation to Compulsory Acquisition, the Applicant has set out in the Statement of Reasons [APP-020] why it is necessary, proportionate and justifiable for the DCO Application to seek powers of compulsory acquisition, and why there is a compelling case in the public interest for the Applicant to be granted these powers to facilitate its construction, operation, maintenance and decommissioning.
BEPS-010	Grid Connection The Applicant	Appearance of bias concerning DESNZ and Macquarie (100% owner of IGP/East Pye Solar). BEPS is seriously concerned by the appearance of bias arising from the Department of Energy Security and Net Zero's private meeting with Macquarie on 27 January 2025 in relation to regional transmission grid connections and a 'deep-dive' on this project (NESO FOI-25-240; DESNZ EIR2026 /	The Applicant does not agree that the matters raised give rise to an appearance of bias in the determination of the Application and the nature of the Scheme's grid connection. No evidence has been provided that the meeting concerned

ID	Theme	Representation	Applicant's Response
		03951; IC-429 804-X4Y8). The Secretary of State, acting through DESNZ, has a quasi-judicial role in determining whether development consent should be granted. That role requires not only actual impartiality, but the appearance of impartiality. Where the decision-making department has met the project's financial or commercial interests, at Macquarie offices, to discuss grid connection issues and to conduct a project-specific 'deep-dive', a fair-minded and informed observer could reasonably question whether the department has maintained sufficient separation between policy facilitation, commercial delivery and its later adjudicative function.	the merits of the Scheme's Application, sought to influence the outcome of the decision-making process, or resulted in any preferential treatment. A meeting in January 2025 between DESNZ officials, the Applicant and Macquarie took place in the context of the Department of Energy Security and Net Zero's (DESNZ) wider policy and delivery responsibilities relating to electricity network infrastructure and the connection of solar and BESS projects to the transmission system. Engagement between DESNZ officials, the Applicant and Macquarie on grid connection matters is consistent with the wider engagement that routinely takes place between government departments, developers, investors, network operators, and other stakeholders in relation to electricity network connections and reform, and does not in itself indicate bias, predetermination or preferential treatment. The Applicant notes that the assertions made in this Relevant Representation

ID	Theme	Representation	Applicant's Response
			regarding the meeting are speculative and are not supported by evidence of bias. NESO has also commented publicly: <i>"NESO rejects any suggestion that its independent analysis or advice has been influenced by any individual developer. We engage regularly with stakeholders across the energy sector, but that engagement does not unduly influence NESO's objective advice or assessments"</i>. The Planning Act 2008 process includes safeguards intended to ensure that applications for development consent are considered fairly and on the basis of the evidence before the decision maker. The grid connection for the Scheme, including its connection date, secured agreement and timelines are contained within the Grid Connection Statement [APP-207].
BEPS-011	The Applicant	This is especially serious because grid connection and asserted need are central parts of the applicant's case. If DESNZ has engaged in project-specific discussions about grid delivery before determining the application, there is a risk that the decision-maker may appear to have formed,	The Applicant notes this comments and refers to its response to BEPS-010.

ID	Theme	Representation	Applicant's Response
		encouraged or facilitated a view that the project should proceed. BEPS submits that this requires full disclosure, a clear explanation of the nature and content of all such meetings, and robust procedural safeguards to ensure that the decision is not tainted by apparent bias. BEPS further submits that the Examining Authority should require a clear statement as to how the Secretary of State's decision-making function will be insulated from any prior DESNZ policy, grid or project-facilitation engagement concerning East Pye Solar, including whether recusal, delegation, independent review or other procedural safeguards are required.	
BEPS-012	Ecology and Biodiversity	European protected species and Habitats Regulations issues. The Scheme affects an area identified as being of exceptional importance for bats, including barbastelles. Their ecologists states it is of national importance. Barbastelles are European Protected Species and are particularly sensitive to habitat loss, severance, lighting, noise, disturbance and changes to commuting and foraging networks.	The Applicant acknowledges the presence of barbastelle bat colonies surrounding the Order Limits and has considered the core sustenance zone within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Scheme design primarily utilises intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular ploughing, tilthing, harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These

ID	Theme	Representation	Applicant's Response
			regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including barbastelle bat maternity roosts). Therefore, land utilised for the Scheme is currently subject to regular disturbance, with the proposals considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-7.18] 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

ID	Theme	Representation	Applicant's Response
			of (amongst other species groups) bats, including barbastelle bats.
BEPS-013	Ecology and Biodiversity	The applicant's case does not adequately demonstrate that the Scheme can avoid harm to protected bat populations. BEPS is particularly concerned that the applicant has treated bat impacts as if they can be managed by retaining isolated hedgerows or applying generic buffers. That is not adequate in a landscape where multiple barbastelle maternity colony core sustenance zones overlap the scheme area and cable corridor. The issue is the loss, severance and disturbance of a functional dark landscape used for commuting, foraging, roosting and population movement. If favourable conservation status cannot be secured, the Scheme cannot lawfully proceed. Peer-reviewed research consistently identifies ground-mounted solar as having a negative impact on 6 out of 8 bat taxa due to habitat fragmentation. Construction noise and proposed pile driving adjacent to known ancient woodland bat habitats and purpose-built hibernacula is also extremely concerning.	The Applicant refers to its response provided to BEPS-012.
BEPS-014	Ecology and Biodiversity	The Tas chalk-stream system also requires specific attention because evidence of white-clawed crayfish currently within the connected catchment, within 2KM of the scheme at Saxlingham Thorpe, fundamentally changes the ecological baseline. Despite the applicant being provided with this evidence from Norfolk Rivers Trust pre-application in December 2025, they have not included it in their application. They cannot lawfully rely on assumptions	No records of white-clawed crayfish have been identified within the Order Limits. Habitat suitability survey for White Clawed Crayfish was undertaken with the findings in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.9 – Aquatic

ID	Theme	Representation	Applicant's Response
		of absence or surveys undertaken when streams and ditches were dry. There are also potential sightings of White Clawed Crayfish at the Krons, which need to be fully investigated. Any cable crossing, haul-road crossing, HDD works, sediment release or pollution pathway affecting the Tas or its tributaries must be assessed on a precautionary basis, with proper full surveys, including WFD compliance and protected species implications.	Habitat Assessment Report [APP-160]. Measures to control pollution to watercourses are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. A technical note giving further details with regards to White Clawed Crayfish Surveys will be submitted at Procedural Deadline A. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for main rivers and watercourses to prevent pollution. Also, as per the Outline Cable Route Construction Statement [APP-216], where cables cross rivers, the Applicant is also committed to a minimum cable depth of 5m below the surveyed bed of main rivers. Trenchless solutions will be employed when crossing the Hempnall Beck, thereby avoiding any temporary impacts upon White Clawed Crayfish populations.

ID	Theme	Representation	Applicant's Response
BEPS-015	Ecology and Biodiversity	The applicant's Habitats Regulations position is also disputed. The application appears to rely on a conclusion of no likely significant effects, despite hydrological and ecological connections across the Order Limits and downstream catchments. BEPS considers that the screening position is insufficiently precautionary and fails to grapple with impact pathways through watercourses, contaminated run-off, sediment, groundwater, construction disturbance and cumulative effects. Where uncertainty remains, the correct legal approach is precautionary. The absence of adequate survey, modelling and certainty cannot be treated as evidence of no effect.	The Applicant notes this comment. Whilst hydrological connectivity between the Order Limits and sensitive water receptors has been identified, the Scheme incorporates embedded mitigation for surface water runoff management and pollution management for all phases of the Scheme as set out within and secured by the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Where trenchless cable crossings interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196]. Within their Relevant Representations response, Natural England agreed with the conclusions of the Shadow Habitats Regulations Assessment [AS-036] that there will be no likely significant effects at Norfolk Valley Fens SAC, The Broads

ID	Theme	Representation	Applicant's Response
			SAC, Broadland SPA and Broadland Ramsar internationally designated sites.
BEPS-016	Ecology and Biodiversity	A level 6 botanist familiar with the South Norfolk Claylands wrote an open letter to East Pye Solar pre-application stating that the ancient landscape of the scheme area was home to vanishingly rare assemblages of botany and that at minimum two-season surveys should be carried out before the application was submitted. Many of the key botanical areas are ancient lanes or verges which are proposed for HGV traffic or lane/road widening, such as Hundred Way. Despite this direct contact and advice, East Pye Solar has not carried out botanical surveys as requested; there is therefore no adequate botanical baseline for this application.	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

ID	Theme	Representation	Applicant's Response
			accommodate oversail. Site Access designs, visibility splays and swept-path analysis is detailed in Appendix C of the 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 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 Construction Traffic Management Plan (CTMP), secured by a DCO Requirement. 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. ES Volume 3, Appendix 8.1 - Ecological Desk Study and Habitat

ID	Theme	Representation	Applicant's Response
			Survey [AS-017] has identified the botanical interest across the Scheme over the past 10 years. This has been supported by the completion of the Biodiversity Net Gain Report [APP-218] which included a condition assessment of key habitats. The Applicant is satisfied that this approach is sufficient and that the data collected to date can inform the works, noting that the majority of development will occur in fields currently used for agriculture and intensive crop growing. Further, the Scheme avoids sensitive habitats with other safeguards (silt fences, buffers, pollution control) put in place during construction and as set out in the Outline CEMP [APP-196]. Crucially, the long-term management of the Site will be supported by Outline LEMP [APP-199] which should encourage and support rare plants.
BEPS-017	Ecology and Biodiversity	BEPS submits that these are not ordinary planning balance matters. They engage strict legal protections. Given that the applicant fails to demonstrate, on robust evidence, that European Protected Species will not be unlawfully harmed	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes a detailed assessment of potential impacts from the Scheme on

ID	Theme	Representation	Applicant's Response
	Policy Compliance	and that there will be no adverse effects on protected sites or qualifying ecological interests, the Scheme cannot lawfully proceed.	important ecological features; including European Protected Species, and protected sites and their qualifying features. The ES concludes, that following the implementation of embedded mitigation as detailed in Section 8.8 , no likely significant effects have been identified in relation to Ecology and Biodiversity.
BEPS-018	Water Environment	Water Framework Directive, chalk streams and private water supplies. The Scheme is located across a sensitive and interconnected hydrological landscape, including chalk stream systems, field ditch networks, tributaries, groundwater pathways, private water supplies, private sewerage and downstream ecological receptors. The applicant's own material recognises hydrological connectivity, but the assessment does not adequately assess how construction, contamination, sediment mobilisation, dewatering, piling, drainage changes and operational run-off may propagate through those systems.	The Applicant notes this comment and refers to its response provided for BEPS-015.
BEPS-019	Water Environment	BEPS is particularly concerned about the River Tas, Hempnall Beck and associated chalk stream catchments, as well as the Waveney-linked drainage network and catchment at site 1 infrastructure hub. Chalk streams are rare and highly sensitive habitats. Harm to hydromorphology, water quality, flow, sediment balance	The Applicant notes this comment and refers to its response provided for BEPS-015. The River Tas, Hempnall Beck and sensitive groundwater dependent ecosystems have been identified and assessed within ES Volume 1:

ID	Theme	Representation	Applicant's Response
		and aquatic ecology may be difficult or impossible to reverse.	Chapter 9 – Water Environment [APP-045] . The assessment concludes that with the incorporation of the embedded mitigation for surface water runoff management and pollution management for all phases of the Scheme as set out within and secured by the Outline CEMP [APP-196] , Outline OEMP [APP-197] and Outline DEMP [APP-198] , the impacts to receptors is 'Not Significant' with the exception of the cessation of agricultural use/fertiliser which is assessed as 'Significant Major Beneficial'.
BEPS-020	Water Environment	The Water Framework Directive issue is therefore central. The applicant must demonstrate that the Scheme will not cause deterioration in the status of any relevant water body and will not prevent the achievement of environmental objectives. BEPS does not consider that the application provides the necessary level of assessment, modelling or certainty. Reliance on outline management plans or future detailed design is not sufficient where the question is whether the Scheme can lawfully pass a gateway test.	The ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] is based on information available at the time of the Application being made and will be kept under review in line with new information and assessments which become available as part of the future ongoing design process for the Scheme, where this information may

ID	Theme	Representation	Applicant's Response
			have relevance to WFD requirements and objectives.
BEPS-021	Water Environment	There are also unresolved concerns about private water supplies. The assessment appears to identify potentially active supplies but does not provide a sufficiently robust, receptor-specific risk assessment of how construction or contamination could affect wells, boreholes or groundwater-fed supplies. This is a public health issue as well as an environmental issue. BEPS submits that development consent should not be granted unless and until the applicant has undertaken full hydrological, hydrogeological and private water supply risk assessments, including baseline monitoring and enforceable protective measures. These issues are particularly important at sites 1 (the Great Moulton infrastructure hub) and site 5 (the project substation) as both are directly hydrologically connected to chalk streams (Waveney and Tas) and both are surrounded by private water supplies and private sewerage, which have not been adequately assessed.	Embedded mitigation for the management of pollution risk to receptors (leaks / spills / contaminants in surface water runoff), including private water supplies is secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. The surface water drainage strategy for the BESS, National Grid and Project Substations incorporates a system lined with an impermeable membrane to prevent the infiltration of runoff to the strata beneath in these areas. The detailed surface water drainage design is secured through DCO Requirement 11. Where trenchless cable crossings interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196].

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			The ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource. The assessment has been undertaken in accordance with the methodology agreed following scoping and uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The abstractions (including Private Water Supplies) within the Study Area are presented in tables 3.10 and 3.11 of the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. The Outline CEMP [APP-196] includes ground investigation as a

ID	Theme	Representation	Applicant's Response
			mitigation measure, with the detailed design of the scheme to be informed by the results of the ground investigation. The results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). As described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] "As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent". 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 (secured by DCO Requirement 13). The Outline

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			CEMP [APP-196] also requires that the Applicant undertake Hydrogeological Risk Assessment for trenchless crossings wherever these interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors.
BEPS-022	Site Selection, Alternatives and Design Evolution	The Great Moulton infrastructure hub is a particular example of an unmitigable siting error. It would introduce major and effectively permanent grid infrastructure into an exposed rural plateau close to sensitive receptors, Tibenham Airfield, multiple private water interests and on the catchment of the Waveney chalk stream. The applicant has not shown that this location was selected because it is environmentally suitable; rather, the evidence indicates a land-led and grid-led selection process, with environmental harm addressed after the event. There was no capacity for East Pye Solar at Norwich Main, so IGP proposed a new National Grid substation at Great Moulton purely to accommodate its own existing speculative land assemblage. This is not how energy infrastructure or National Grid substations should be sited.	Factors considered in the site selection process are given in the Site Selection Assessment [APP-215]. This includes consideration of planning, environmental and operational factors in the search for suitable sites. These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3. The approach to the identification of land for a new National Grid Substation, including consideration of alternative sites, is set out in the Site Selection Assessment [APP-215] and had regard to the National Grid Company plc's 'Substation and the Environment: Guidelines on Siting and Design' (the Horlock Rules). This

ID	Theme	Representation	Applicant's Response
			process considered the accessibility of the National Grid Substation from the Strategic Road Network, proximity to the existing 400kV overhead line to minimise the length of diversions, and environmental and planning constraints.
BEPS-023	Ground Conditions	Contamination, former airfields and groundwater risk. The Scheme includes or lies close to areas with known or potential contamination risks, including former military airfield land and other potentially contaminated sites. BEPS is concerned that the applicant has not adequately assessed whether construction activities could mobilise contaminants into groundwater, private water supplies, ditches, streams or chalk aquifers.	The Applicant refers to its response provided to BEPS-422 to BEPS-430.
BEPS-024	Ground Conditions Water Environment	The risk is particularly acute where contaminated land, shallow groundwater, chalk geology, drainage works and sensitive water receptors coincide. A failure to undertake adequate site investigation and pathway analysis before consent would leave fundamental matters to be resolved later, when the principle of development had already been approved. BEPS objects to that approach. Contamination and water impacts must be assessed before consent, not deferred.	The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier

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			2 Generic Quantitative Risk Assessment (GQRA). As described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] <i>"As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent"</i>. 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 (secured by DCO Requirement 13). The Outline CEMP [APP-196] also requires that the Applicant undertake Hydrogeological Risk Assessment for trenchless crossings wherever these interact with Principal or Secondary A

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			aquifers or pass beneath surface watercourses or sensitive ecological receptors.
BEPS-025	Soils and Agriculture	Best and most versatile agricultural land and soil harm. The Scheme would remove a very large area, 2700 acres, of grade 2 and grade 3a Best and Most Versatile agricultural land from productive use for 60 years. BMV land forms approximately 80% of the scheme (the cable corridors have not been assessed). BEPS objects to the applicant's treatment of this harm as reversible, adequately mitigated or in line with government policy.	These matters are addressed fully in ES Volume 1, Chapter 15, Soils and Agricultural Land [APP-051]. The land quality has been assessed by detailed field survey and the results are set out in Chapter 15. The Chapter examines the construction methodology and concludes that only in specific and limited areas will the land quality be affected, in most case on a temporary and reversible basis. This is summarised in Table 15.14. The area within sites 1 – 10 and the BESS is 829ha (2,048 acres) as set out at Table 15.6. The proportion of land of BMV quality is set out in Table 15.6 of ES Chapter 15, Soils and Agricultural Land [APP-051]. Under the new Predictive ALC Map for England the majority of Norfolk is predicted to be of BMV quality. The area permanently lost for the N G Substation and the woodland planting

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			is a minor adverse effect and not significant, as set out at 15.8.66.
BEPS-026	Soils and Agriculture	Long-term solar deployment on BMV land can affect soil structure, drainage, compaction, agricultural viability, tenant farming businesses and future restoration prospects. The risk is greater where construction compounds, tracks, cabling, piling, substations, BESS infrastructure and repeated maintenance access are involved. Peer-reviewed research including that carried out on behalf of the Welsh Government shows that BMV land is particularly negatively impacted and can be permanently damaged.	All of these matters are considered in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] . The Welsh Government research referred to concluded that it is important to carry out good soil management to minimise and avoid adverse effects. An Outline SRMP [APP-204] and a detailed SRMP will be submitted and can be controlled by DCO Requirement.
BEPS-027	Soils and Agriculture Decommissioning	BEPS also objects to the lack of certainty around decommissioning and restoration. If the applicant cannot demonstrate now what infrastructure will be removed, how soils will be restored, how compaction will be remediated, and how land will be returned to agricultural productivity, then the claimed reversibility of the Scheme is not proven.	This comment is noted. The decommissioning of the Scheme has been assessed within the ES [APP-036 to APP-195] . Mitigation measures for the decommissioning phase is provided within the Outline DEMP [APP-198] . The Outline DEMP is designed with the objective of securing the relevant environmental mitigation measures set out within the ES. Any additional licences, permits or approvals that are required will be listed in the detailed DEMP.

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			At the end of the Scheme's operational life, apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned and the land returned to the landowner, as set out in the Outline DEMP [APP-198]. Post-decommissioning, the landowners would choose how the land is to be used and managed. The approach to decommissioning for the cables would be dependent upon Government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. A detailed DEMP will be prepared substantially in accordance with the Outline DEMP [APP-198] and must be submitted to and approved by the relevant planning authority prior to the commencement of decommissioning. This is secured

ID	Theme	Representation	Applicant's Response
			through Requirement 21 in Schedule 2 of the Draft DCO [AS-032] .
BEPS-028	Ecology and Biodiversity Decommissioning	If the scheme is fully reversed back to original agricultural use then Biodiversity Net Gain claims need to be reassessed as new habitats must be destroyed to enable this.	The Applicant refers to its response provided to BEPS-027. The land will return to the landowner to do as they wish providing they are compliant with any other environmental agreements they may have entered into. The Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land.
BEPS-029	Soils and Agriculture	The March 2026 Land Use Framework for England reinforces the importance of protecting productive agricultural land and food security. As around 80% of the land proposed for East Pye solar fields is BMV land, BEPS submits that this weighs heavily against the proposal and reinforces the need for a clear demonstration that poorer-quality or less harmful land is not available. The applicant has admitted that this project is not required to meet Clean Power 2035 solar targets in the T7 region, therefore the potentially permanent loss of this extensive BMV land in this location cannot be justified. On this basis, the East Pye Solar proposal should be judged contrary to policy and refused.	The areas of land in Sites 1 – 10 and the BESS are set out in Table 15.6, and the proportion of land of BMV quality for the solar PV array areas (Works No 1) are set out in Table 15.7 of ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051] . comments are noted. There will be only limited areas where there will be a permanent loss of agricultural land, as set out in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051] , for permanent fixed infrastructure and for tree planting (Table 15.14). The loss of the National Grid

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			Substation and for woodland planting is assessed as a minor adverse effect and not significant. The regional need of the Scheme is addressed at BEPS-002.
BEPS-030	Landscape and Visual	Cultural Heritage, landscape and residential amenity. This is a sensitive, historic landscape of national importance for the quality and quantity of its pre-1750s rural architecture, with over 300 listed buildings in the zone of influence. The introduction of large-scale solar infrastructure, substations, fencing, CCTV, access tracks, lighting and associated works would erode that setting. This engages the statutory duty to have special regard to the desirability of preserving listed buildings and their settings, not merely a general landscape balancing exercise.	An assessment on heritage assets, including Conservation Areas and listed buildings, is provided in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and the ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]. As described in the Design Approach Document [APP-212], heritage assets have been considered during the design process with the principle to mitigate impact by design, where practicable. This includes, for example reducing the extent of Solar PV Arrays in proximity to some designated heritage assets.
BEPS-031	Landscape and Visual	The Scheme would industrialise a wide and tranquil rural landscape. Its impacts would not be confined to individual parcels of land but would be experienced cumulatively across villages, lanes, public rights of way, heritage settings and residential receptors. BEPS considers that the applicant has understated the true visual and landscape	A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] . Further, a visual amenity assessment of Public Rights of Way is present in ES Volume 3,

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		impact, including by relying on limited or seasonally unrepresentative viewpoints and by failing to present cumulative development in a way that reflects its real spatial extent.	Appendix 7.9 [APP-149] and on residential properties in ES Volume 3, Appendix 7.8 [APP-148]. The methodology follows GLVIA3, a recognised industry standard. The Applicant disagrees with the assertion that the assessment relies on "limited or seasonally unrepresentative viewpoints". The LVIA includes both summer and winter photography, with winter photography representing the worst-case scenario due to reduced vegetation screening. View locations were identified through a combination of desk-based analysis and site surveys and were selected to provide representative and, where appropriate, worst-case views of the Scheme from a range of directions, distances and receptor types. The viewpoint locations were agreed with South Norfolk Council to ensure that the assessment captured views that are representative of the local landscape context and likely receptor experiences.

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			The Applicant also disagrees with the assertion that the assessment fails to present cumulative development in a manner that reflects its spatial extent. The cumulative assessment has been undertaken in accordance with a clear and proportionate methodology. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
BEPS-032	Landscape and Visual	Residential amenity and business impacts are also understated. These include outlook, noise, construction traffic, glint and glare, loss of tranquillity, proximity to infrastructure, cumulative enclosure and the lived experience of residents whose homes and businesses would be surrounded or materially affected by the Scheme.	A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Furthermore, a visual amenity assessment of Public Rights of Way is present in ES Volume 3, Appendix 7.9 [APP-149] and on residential properties in ES Volume 3, Appendix 7.8 [APP-148]. The methodology follows appropriate industry standards.

ID	Theme	Representation	Applicant's Response
			Other technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040] , which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation
BEPS-033	Aviation Glint and Glare	Aviation and cumulative infrastructure impacts. The Scheme raises unresolved aviation concerns, particularly in relation to Tibenham airfield and the siting of tall or visually intrusive infrastructure in areas where aviation safety, emergency landing, glare, distraction and operational constraints require careful assessment. BEPS does not consider that these issues have been sufficiently integrated into the site selection and alternatives assessment.	The Applicant has specifically assessed Tibenham Airfield within ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029], and the High Level Investigative Report [APP-222] considering glint and glare and emergency landing. The assessments concluded that a significant impact (and therefore distraction and operational constraints) is not predicted. Factors considered in the site selection process is given in the Site Selection Assessment [APP-215]. This includes consideration of planning,

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			environmental and operational factors in the search for suitable sites. These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3. Consideration has included both technical constraints (i.e. proximity to grid connection, site size, compatibility of land uses) and consideration of the avoidance and reduction of environmental impacts by excluding ecological, landscape and heritage designations. The design evolution of the Scheme, as summarised in the Design Approach Document [APP-212], has sought to avoid and/or reduce environmental impacts as far as practicable through the design process.
BEPS-034	Cumulative impact	The cumulative assessment is also inadequate. The applicant's presentation of other major energy and infrastructure projects as single dots on a map does not properly show their true landscape extent or cumulative relationship with East Pye Solar. BEPS is concerned that projects such as Tasway Energy Park and other energy infrastructure and housing projects have been treated	A comprehensive Cumulative and In Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate guidance, as detailed within ES Volume 1, Chapter 2 - EIA Methodology [APP-038] . Two

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		inconsistently. A lawful cumulative assessment must assess the real-world cumulative burden on the landscape, communities, ecology, water systems, aviation interests and grid infrastructure.	types of cumulative effects have been assessed within the ES: • In-combination effects – the inter-relationship between individual development effects on one particular receptor; and • Cumulative effects – multiple existing and/or approved developments generating additive effects which together have an increased effect on the same receptors. ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116] details the cumulative schemes considered within the ES. Each topic chapter within the ES [APP-042 – APP-054] sets out how the particular topic area has considered and assessed the cumulative effects arising as a result of other existing or proposed development. A summary of all cumulative effects is provided within Table 20.4 of ES Volume 1, Chapter 20 - Summary of Residual Significant Effects [APP-056].

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			ES Volume 1, Chapter 19: In-Combination Effects Assessment [APP-055]. Provides an assessed of in-combination effects, where receptors are subject to residual effects under more than one environmental topic. In-combination effects have been considered during construction, operation, and decommissioning phases of the Scheme. With regards to the Tasway Energy Park, the Applicant has sought to assess all cumulate schemes in accordance with <i>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017</i> (the EIA Regulations) and the Planning Inspectorate's <i>Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment</i>. The EIA Regulations require the assessment to take into account '<i>the cumulation of effects with other existing and/or approved projects...</i>' (Schedule 4, paragraph 5(e)) and the same is required by the Planning

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			Inspectorate's <i>Advice on Cumulative Effects Assessment</i>. The Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorates website as a DCO project. Should the Tasway Energy Park project ever proceed, the cumulative effects of the Scheme and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance.
BEPS-035	Consultation and Engagement	Consultation and procedural unfairness. BEPS objects to the adequacy of consultation. The Scheme evolved over time, with new parishes, residents and land interests brought into scope through targeted consultation. BEPS is concerned that affected people were not given a fair, accessible and complete opportunity to understand and respond to the true impacts of the Scheme.	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant considers the materials provided were adequate and

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			informative, and presented information using standard mapping conventions. The acceptance of the Applicant's application for examination by the Planning Inspectorate serves as confirmation that the Applicant has fulfilled its statutory pre-application duties. The consultation process is set out in the Consultation Report [APP-024], which details the Applicant's approach to pre-application consultation. Throughout the consultation period, anyone was welcome and encouraged to get in touch using any of the free-to-use communication channels provided, including email, freephone, and post. Respondents were also invited to attend the in-person and virtual community information events, where they could view the maps and ask questions or seek clarification directly from the Applicant's project team. The Applicant also notes that the examination process provides a further opportunity for Interested Parties to comment on the Scheme. This

ID	Theme	Representation	Applicant's Response
			examination is managed by the independently appointed Examining Authority. Further to this, the Applicant provided an extended Relevant Representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an interested party.
BEPS-036	Consultation and Engagement	We are concerned that the Planning Document maps for this scheme currently being posted around the area are different to those shown on the application, and are being placed miles from the areas shown, where landowners are unlikely to find them.	The Applicant confirms that the notices erected on site between April 2026 and June 2026 relate to the statutory notification requirements under Section 56 of the Planning Act 2008, which is required when the Secretary of State accepts an application for an order granting development consent. The plans accompanying these notices identified areas of unregistered land that interact with the Scheme, either directly or indirectly. As the land is unregistered, ownership details and any associated rights or interests are not recorded at HM Land Registry. Consequently, additional measures are required to ensure that all potentially

ID	Theme	Representation	Applicant's Response
			affected parties are identified and informed. The erection of these notices formed part of the Applicant's ongoing due diligence process to identify and engage with all persons who may hold an interest in land affected by the Scheme. This approach ensures that reasonable steps have been taken to notify relevant parties, keep stakeholders informed of the Scheme's progress, and support compliance with the statutory consultation and notification requirements. The Applicant is satisfied that the notices were appropriately displayed and fulfilled their intended purpose.
BEPS-037	Consultation and Engagement	The application material is complex, voluminous and in some respects inaccessible to ordinary residents. Where key plans are difficult to interpret, depend on layered software access, or do not clearly show the true extent of impacts, consultation is undermined. Procedural fairness is not a formality. It is essential to the legitimacy of the DCO process. We have requested that a printed copy of the full application should be placed in local libraries so that the community can consult it. As many aspects in the PEIR were deferred to the ES, it is important that the community has full access to the ES in libraries as they did to the	The Applicant acknowledges that there has been some misunderstanding over the potential use of compulsory acquisition powers over residential property. The Applicant provided further information regarding this matter in a letter to properties on the 24th July 2025. This letter reassured landowners that the Applicant does not intend to seek compulsory acquisition powers for any homes, gardens or

ID	Theme	Representation	Applicant's Response
		PEIR. Our residents are frequently elderly and without computers or broadband capabilities to access the documents. We have been told that the application can be supplied on a USB - which does not solve the non-digital problem - or that we must pay £5000 for one. This attitude does not reflect the applicant's stated commitment to ensure that special demographics are adequately consulted on the project. Communities experiencing rural digital exclusion are a recognised vulnerable group. Although actively consulting and ensuring access to other vulnerable groups miles away in Norwich and Wymondham, East Pye Solar is not addressing the primary access issue in the area actually impacted by their project. This is particularly concerning where they are seeking Compulsory Purchase Powers over residents' property. They write letters to elderly residents because they have no email address, yet in the letters tell them to look at the application online to understand the impact on their property.	buildings and this has never formed part of the project proposal. The Applicant considers that appropriate arrangements were put in place to ensure access to the consultation material. The charge of £5000 referred only to the cost of producing a hard-copy set of the ES and application documentation, which comprised a substantial volume of material. It is not standard practice, nor reasonably practicable, for applicants to provide printed copies of the full suite of documentation free of charge. The full PEIR, PEIR Non-Technical Summary and supporting consultation materials were available electronically at no cost throughout the consultation period. In addition, dedicated community relations channels were available to assist consultees and, where requested, hard copies of individual documents, plans and figures could be provided. The Applicant provided free copies of materials on request and made available printed copies of the PEIR at

ID	Theme	Representation	Applicant's Response
			the six in-person information events during the Phase Two statutory consultation and at the Long Stratton Library CAP from 18 June to 1 December 2025. USB drives, containing the ES was hosted at the same venues post-acceptance of the Scheme. These arrangements ensured that environmental information was readily accessible and that consultees had a range of ways to engage with the consultation. At various stages of the Scheme's consultation stages, multiple individual requests for hard copy figures and figures were provided by the Applicant to those digitally excluded.
BEPS-038	Policy Compliance	A recurring defect across the application is unlawful or unsafe deferral. The applicant seeks consent first and proposes to resolve essential matters later through outline plans, future surveys, later licences, future drainage details, later construction controls, later decommissioning arrangements and later ecological mitigation. That approach is not acceptable where the unresolved matters go to legal compliance, public health, protected species,	The Applicant notes the concerns raised regarding the approach to securing detailed matters through outline management plans and post-consent processes. The construction, operation and decommissioning of the Scheme have been assessed in the ES [APP-036] to [APP-195] on a reasonable worst-case

ID	Theme	Representation	Applicant's Response
		WFD duties, aviation safety, contamination risk and the basic deliverability of the Scheme.	basis in accordance with the 'Rochdale Envelope' approach, as set out in ES Volume 1, Chapter 2 – EIA Methodology [APP-038], which identifies the mitigation measures relied upon. The outline management plans [APP-196] to [APP-205] are designed with the objective of securing the relevant environmental mitigation measures set out within the ES, and establish the framework for the details to be secured through the DCO Requirements. The Applicant draws attention to the fact that a degree of flexibility is appropriate at this stage given the outline nature of the management plans, the need to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. The specificity will be provided in the detailed management plans, which will be substantially in accordance with these outline management plans, and which will be submitted to and approved by the relevant planning

ID	Theme	Representation	Applicant's Response
			authority, in consultation with the relevant statutory consultees where specified in the Draft DCO [AS-032]. The approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032]. The Applicant further draws attention to Paragraph 2(4) of Schedule 15 to the Draft DCO [AS-032], which requires the Applicant to confirm when submitting the final plan for approval whether it would give rise to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that any mitigation measures identified in the ES are contained in the final plans, or an explanation is provided as to why there is a change. Failure to comply with a DCO Requirement would be a criminal offence and there are enforcement mechanisms that would ensure such mitigation would be implemented. The Applicant also draws attention to the

ID	Theme	Representation	Applicant's Response
			fact that the DCO Application has been prepared in compliance with the relevant legal and regulatory requirements, including the EIA Regulations, the Habitats Regulations and the Water Framework Directive, as set out in the Planning Statement [APP-209] , the Shadow Habitats Regulations Assessment [AS-036] and ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] . Where consents, licences or permits are required outside of the DCO, these are addressed in the Consents and Agreements Position Statement [APP-217] , which sets out the Applicant's position that there should be no reason to believe that any operational pollution permits, licences and/or other consents will not be granted.
BEPS-039	Statement of Need	Overall planning balance and remedies sought. BEPS' summary position is that the Scheme fails the planning balance. The applicant has not demonstrated a compelling need for East Pye Solar in this location or region. It has not	The Applicant refers to its responses provided to BEPS-002 and BEPS-005. Further, the Applicant agrees with this representation in that more

ID	Theme	Representation	Applicant's Response
		shown that less harmful alternatives have been properly assessed. It has not admitted the obvious: that another of IGP's many proposed schemes in a transmission region that actually requires more transmission solar to reach Clean Power 2031-35 targets would be the correct solution, both to advance Net Zero, to prevent harm and to prevent constraint payments by consumers. It has not resolved gateway legal issues relating to protected species, Habitats Regulations, the Water Framework Directive, private water supplies, contamination, heritage protection and procedural fairness. It has not demonstrated that the most serious harms are capable of mitigation.	transmission solar is required in other locations to achieve the Government's Clean Power target. However, due to the urgent need for an unprecedented capacity of new low-carbon generation facilities, any other proposals are needed alongside rather than as an alternative to the Scheme. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies. The NPPF does not contain specific policies for NSIP such as the Scheme. The Scheme will primarily be determined in accordance with the national policy statements (namely NPSs EN-1, EN-3 and EN-5). However, the NPPF may still be considered by the Secretary of State to the extent it is considered important and relevant to the decision. The NPPF and associated Planning Practice Guidance has been considered, where relevant, in the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. A new NPPF was published in

ID	Theme	Representation	Applicant's Response
			August 2026. An update in respect of the new NPPF will be submitted at Deadline 1. The Planning Statement [APP-209] demonstrates national policy compliance and how sustainable development has been achieved through the outcomes of the environmental impact assessment, good design and delivery of economic benefits.
BEPS-040	Consultation and Engagement EIA Methodology	BEPS submits that the application cannot lawfully progress further without further environmental information, corrected assessment, re-consultation where necessary, and enforceable safeguards sufficient to demonstrate compliance with all relevant legal gateway tests.	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. For this reason, the Applicant did not hold a further round of pre-application consultation. The Applicant also notes that the examination process provides a further opportunity for Interested Parties to

ID	Theme	Representation	Applicant's Response
			comment on the Scheme. This examination is managed by the independently appointed Examining Authority. Further to this, the Applicant provided an extended Relevant Representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an Interested Party.
BEPS-041	EIA Methodology	Further information should not be used merely to patch evidential gaps after the principle of development has effectively been accepted. At minimum these should include lawful alternatives assessment, complete ecological (including botany, white-clawed crayfish and bat) surveys, a robust Habitats Regulations assessment, Water Framework Directive compliance assessment, hydrogeological and private water supply risk assessments, contamination pathway modelling, corrected cumulative assessment, winter and representative visual material, aviation safety assessment acceptable to Tibenham Airfield and GAAC, enforceable decommissioning and restoration security, and full disclosure of DESNZ/Macquarie engagement relevant to grid connection, need and project facilitation.	The Applicant has set out the position on these matters in the responses provided above, and within the response to the full Relevant Representation below. For example, see BEPS-010.

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BEPS-042	General remarks	For the reasons set out in this summary and in the attached full representation (by email), BEPS submits that East Pye Solar is not an acceptable or lawful development. BEPS therefore asks the Examining Authority and the Secretary of State to refuse development consent.	The Applicant disagrees with this comment. The Applicant considers that the DCO Application has been prepared in accordance with the Planning Act 2008, the EIA Regulations and the relevant National Policy Statements, as demonstrated in the Planning Statement [APP-209] and Policy Compliance Document [APP-210].
Full Relevant Representation on behalf of Block East Pye Solar			
BEPS-043	Consultation and Engagement	The consultation process was conducted on a shifting and insufficiently stable project, with real defects in coverage, reporting and access BEPS objects to the adequacy and reliability of the consultation process. The applicant's own consultation notices confirm that statutory consultation concerned an exceptionally large and complex scheme of approximately 2,232 hectares, including Sites 1 to 10, BESS, National Grid substation options, cable route corridors, works to the existing 400kV overhead line and pylons, compulsory acquisition powers and a 60-year operational life. For a scheme of this scale, consultees required clear, accurate and stable information. In BEPS's submission, they were not given that. The consultation materials themselves show that the PEIR formed the basis of consultation while the Environmental	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant considers the materials provided were adequate and informative, and presented information using standard mapping conventions. The acceptance of the Applicant's application for examination by the Planning Inspectorate serves as

ID	Theme	Representation	Applicant's Response
		Impact Assessment remained ongoing and the design of the Scheme would continue to evolve during pre-application. BEPS submits that consultees were therefore being asked to comment on a project that was not yet sufficiently settled. This is not a minor point. It goes directly to whether consultees were given a fair opportunity to understand and respond to the likely significant effects of the scheme actually intended to be applied for.	confirmation that the Applicant has fulfilled its statutory pre-application duties. The Applicant notes that consultation is necessarily undertaken on emerging proposals rather than finalised designs. The final proposals are the product of an iterative process incorporating consultation feedback, environmental assessment and technical refinement. The PEIR, by nature, is preliminary and the Applicant provided a robust Environmental Statement to support this during submission. The consultation process is set out in the Consultation Report [APP-024], which details the Applicant's approach to pre-application consultation. The Applicant wishes to clarify that whilst 2,232 hectares was consulted upon during Statutory Consultation, this figure included the Cable Route Corridor which had not yet been refined at that stage. Following further design evolution, by the time the DCO Application was submitted, the total

ID	Theme	Representation	Applicant's Response
			area of the Scheme, inclusive of the Cable Route Corridor, had been reduced to 1,212.3 hectares.
BEPS-044	Consultation and Engagement	There were also practical limitations on access to the full consultation material. The section 48 notice and section 46 notification state that hard copies of the PEIR and PEIR NTS could be requested only at a charge of up to £750, while other consultation materials were free. In BEPS's submission, for a project of this size and complexity, that plainly limited effective public access to the full environmental information.	The Applicant considers that appropriate arrangements were put in place to ensure access to the consultation material. The charge of £750 referred only to the cost of producing a hard-copy set of the PEIR documentation, which comprised a substantial volume of material. It is not standard practice, nor reasonably practicable, for applicants to provide printed copies of the full suite of documentation free of charge. The full PEIR, PEIR Non-Technical Summary and supporting consultation materials were available electronically at no cost throughout the consultation period. In addition, dedicated community relations channels were available to assist consultees and, where requested, hard copies of individual documents, plans and figures could be provided. These arrangements ensured that environmental information was readily accessible and that consultees had a

ID	Theme	Representation	Applicant's Response
			range of ways to engage with the consultation. The Applicant provided free copies of materials on request and made available printed copies of the PEIR at the six in-person information events during the Phase Two statutory consultation and at the Long Stratton Library CAP from 18 June to 1 December 2025. USB drives, containing the ES was hosted at the same venues post-acceptance of the Scheme.
BEPS-045	Consultation and Engagement	The reliability of the Consultation Report and consultation record is also in doubt. In its 26 March 2026 response to PINS on consultation signposting, the applicant expressly admitted that Appendix 7 to the Consultation Report incorrectly identified Pulham Market Parish Council as 'Pulham St Mary Parish Council', describing this as a typographical error. The same letter also states that Framingham Earl Parish Council was not treated as a prescribed consultee at the statutory consultation stage because it did not host the PEIR Order Limits, but was later added for the Targeted Consultation following "further due diligence" concerning the final nature and number of changes. BEPS submits that this supports the wider concern that the geography of affected parishes, and even	The Applicant refers to its response provided under BEPS-043 regarding the adequacy of the statutory consultation. The Applicant has responded to PINS Section 51 Advice under Applicant's Response to Advice at Acceptance [AS-001]. As noted in this response, the Applicant confirmed that Pulham Market Parish Council was formally notified of the non-statutory Phase One consultation in October 2024, the statutory Phase Two consultation in

ID	Theme	Representation	Applicant's Response
		the applicant's own reporting of who had been consulted, was unstable and required post hoc correction. That concern is reinforced by PINS' own section 51 advice, which expressly advised the applicant to take a precautionary approach and serve notice on Pulham Market Parish Council and Framingham Earl Parish Council when serving section 56 notice, unless there was a specific justification not to do so. In BEPS's submission, that is not consistent with a robust and settled statutory consultation exercise.	June 2025 and the Targeted Consultation in October 2025. The Applicant wrote to PINS in March 2026 to provide this clarification, in response to a request to signposting information. The Applicant also confirms, in response to Section 51 advice, the Applicant served notice of the accepted application under section 56(2)(a) of the Planning Act 2008 on Pulham Market Parish Council and Framingham Earl parish Council, as well as other relevant consultees.
BEPS-046	Consultation and Engagement Scheme Description	There is also evidence that consultation took place against a shifting scheme description. The consultation notices and section 46 material described the Scheme as including 'up to two 400kV substations'. Later, PINS identified inconsistency in the application documents as to whether the Scheme involved two or three 400kV substations. That inconsistency supports BEPS's wider submission that consultation was not carried out on a sufficiently stable and consistently described project. Accordingly, BEPS objects that the consultation process was conducted on a shifting and insufficiently stable scheme; that access to the full environmental information was materially constrained; and that the consultation	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Works Plan [AS-002 and AS-003] and Design Principles, Parameters and Commitments [APP-213] set out the maximum parameters and commitments for Substations, as

ID	Theme	Representation	Applicant's Response
		record itself contains admitted errors and evidence of late identification of affected consultees. The consultation history should therefore be treated with caution.	explained in ES Volume 1, Chapter 2 - Environmental Impact Assessment Methodology [APP-038], the Environmental Impact Assessment is based on the 'Rochdale Envelope' in accordance with guidance from the Planning Inspectorate to assess the worst case scenario. The Applicant confirms that the Scheme comprises up to three 400kV Project Substations and up to three 132kV Project Substations, together with a new National Grid Substation. The Iterative process in the design evolution was reflected at each stage of consultation and consultees given an opportunity to comment on changes at appropriate times during pre-application.
BEPS-047	Consultation and Engagement	The applicant's Section 55 checklist is revealing because it presents a clean compliance narrative that is materially at odds with the host authorities' formal Adequacy of Consultation Representations. In particular, the applicant states that it complied with Chapter 2 of Part 5 and refers to host-authority confirmation of consultation delivery, yet both Norfolk County Council and South Norfolk Council formally concluded that section 42 had not been complied	The Applicant refers to its response provided under BEPS-043 regarding the adequacy of the statutory consultation. The acceptance of the Applicant's application for examination by the Planning Inspectorate serves as confirmation that the Applicant has

ID	Theme	Representation	Applicant's Response
		with. The checklist also continues to characterise the targeted consultation changes as small Order Limits refinements, understating the significance of the infrastructure, AIL, vegetation and newly affected-community issues recorded elsewhere in the application material for which an updated PEIR was not provided.	fulfilled its statutory pre-application duties. As presented in the Targeted Consultation Information Change Note, which is provided in Consultation Report Appendix 9: Targeted Consultation Materials [APP-033], the additional areas and activities including their nature, extent and duration were reviewed as part of the environmental assessment. The assessment areas did not change the likely significant effects of the EIA that was set out at Phase Two Statutory consultation in the Preliminary Environmental Impact Report (PEIR). Therefore, an updated PEIR was not necessary for this targeted round of consultation.
BEPS-048	Consultation and Engagement EIA Methodology	Material ecological information provided to East Pye Solar and copied to the Planning Inspectorate pre-application has not been referenced or included in the ES submission: A statement by Norfolk Rivers Trust that surveys within the last five years identify a breeding colony of white clawed crayfish within 2KM of the proposed scheme.	The Applicant provided responses to feedback received at statutory consultation in the Consultation Report [APP-024]. A summary of responses received can be found in Chapter 12: Account of feedback and the Applicant's response to the statutory consultation of the Consultation Report [APP-024] and

ID	Theme	Representation	Applicant's Response
		- A statement by Alex Prenderghast, a level 6 botanist familiar with the South Norfolk Claylands, that this is an area of importance for rare botany and that botanical surveys should be done to understand the baseline and to avoid harm, especially in the areas proposed for transport, haul roads, or road widening. - Evidence by Norfolk Barbastelle Study Group of multiple maternity colonies of barbastelles, with overlapping barbastelle core sustenance zones across the entire scheme area. A call for further survey work and radio tracking to understand the extent of the population and their use of the landscape. - Appearance of bias / compromised impartiality evidence. None of these issues are adequately addressed in the Consultation Report or the ES.	in more detail in Consultation Report Appendix 10: Section 47 Applicant Response Table [APP-035]. The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of specific ecological surveys is presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160], with Appendix 8.5 and Appendix 8.6 specifically relating to bat surveys. An assessment of potential effects of the Scheme on bats during construction, operation, and decommissioning is set out within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The scope of assessment has also been agreed through the scoping and consultation process, as described in Section 8.2 of the Ecology and Biodiversity Chapter [APP-044]. The Applicant notes the Examining Authority's (ExA) request for further information and potentially for surveys

ID	Theme	Representation	Applicant's Response
			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. The Applicant has provided further responses to respondent's comments below.
BEPS-049	The Applicant	Appearance of Bias A document on appearance of bias was submitted by BEPS to East Pye Solar with the request that it should be submitted with the DCO application. The document presents evidence of communications by Island Green Power to DESNSZ with regard to changing the regional targets for solar in the Clean Power 2030 Action Plan. Further evidence obtained through Freedom of Information requests reveals that DESNZ and Macquarie, the owner of Island Green Power, met in January 2025 for a private meeting at Macquarie offices in London, to discuss the issue of grid connections for transmission solar projects and that East Pye Solar was one of the projects discussed as a 'deep dive'. The full document written by BEPS with the Freedom of Information evidence will be resubmitted as part of BEPS' written representations. Given the quasi-judicial role of DESNZ in decision-making on this DCO, the series of events with private meetings between DESNZ	The Applicant notes this comment and refers to its response provided to BEPS-010.

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		and Macquarie to discuss this project in detail gives rise to a serious appearance of bias.	
BEPS-050	Statement of Need	Statement of Need The Statement of Need does not overcome the regional oversupply and proportionality problem BEPS objects to the applicant's Statement of Need because, although it sets out a broad national policy case for solar in general, it does not establish a convincing need for this particular Scheme in this particular location. The document repeatedly relies on national propositions that there is an urgent need for low carbon generation, that Clean Power 2030 and the 2035 pathways are not a cap, and that optionality in the pipeline is desirable. Those propositions may be true at a high level, but they do not answer the more specific issue raised by this application: whether a 500MW solar NSIP with major and disputed, potentially unmitigable environmental effects is justified in a region where the planning and connections pipeline already appears to be at or beyond the relevant regional need ranges. The Statement of Need expressly says that the Site lies at the border of the 'Central England' and 'E. Anglia' transmission network regions and that NESO's Connections Reform process has already 'prioritised sufficient solar schemes to meet the Clean Power 2030	The Applicant refers to its response provided to BEPS-002 and BEPS-005. As set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.

ID	Theme	Representation	Applicant's Response
		regional capacity ranges for 2035' for both of those regions. The document acknowledges that the relevant regional ranges are already met by prioritised schemes. It then attempts to move away from the significance of that point by saying that the planning pipeline in the region would, 'if delivered', provide significant support to the Government's Clean Power target. In BEPS's submission, that does not establish the need for East Pye Solar; rather, it underlines the opposite problem, namely that the applicant is trying to justify a highly damaging and highly constrained project in a region where sufficient solar schemes have already been prioritised.	
BEPS-051	Statement of Need	The applicant's answer is to argue that the Clean Power 2030 and 2035 ranges are not a cap and that a larger development pipeline is needed because of attrition and the desirability of optionality. BEPS does not dispute that the national policy framework does not impose a rigid national ceiling. However, the issue is one of regional necessity, proportionality and planning balance. Once the relevant regional ranges are already met by other prioritised schemes, the applicant cannot simply invoke national optionality as though it automatically justified every additional project, regardless of local harm, ecological constraints, heritage sensitivity, water risk, agricultural loss, compulsory purchase and major accident concerns. The more constrained and harmful the site, the more important it becomes for the applicant to show why this scheme, in	The Applicant refers to its response provided to BEPS-002 and BEPS-005. As set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from

ID	Theme	Representation	Applicant's Response
		this place, is genuinely needed over and above other schemes already in the pipeline.	providing low-carbon energy to meet the needs identified in NPS EN-1.
BEPS-052	Statement of Need Grid Connection	That is especially so here, because the Statement of Need also admits that the BESS element has only secured only a Gate 1 prioritisation and that its indicative connection date has not yet been confirmed. The applicant nevertheless relies throughout the Statement of Need on the benefits of co-located storage, flexibility and affordability. If the BESS does not have a firm Gate 2 position, then a substantial part of the need case remains contingent. In BEPS's submission, that weakens the applicant's attempt to rely on a solar-plus-storage justification for a scheme of this scale and sensitivity.	The Applicant refers to its response provided to BEPS-002 and BEPS-005.
BEPS-053	Statement of Need Grid Connection	As set out in the Energy Minister's Open Letter of 16 April 2026, government has expressly recognised a significant national surplus of battery projects progressing through connections reform, has warned of the risks this creates for system design, cost and queue management, and has identified the possibility of tighter treatment of Gate 1 battery projects in future windows. This means the East Pye BESS cannot be treated as a robust or settled component of the Scheme's public benefits. At present it is a contingent and speculative element of the proposal, rather than one whose delivery can confidently be assumed. The consequence is that materially less weight should be given to the applicant's claimed solar-plus-storage benefits,	The Applicant refers to its response provided to BEPS-002 and BEPS-005.

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		and the Examining Authority should require the applicant to justify the Scheme on the basis of what is actually secured and credible, rather than on a BESS element whose progression beyond Gate 1 remains uncertain. There is no guarantee that the solar plus BESS full project can ever be delivered.	
BEPS-054	Statement of Need	The Statement of Need also places considerable weight on the proposition that projects in the prioritised pipeline may not all be delivered, and that attrition means more projects should be allowed to progress. But that argument is too abstract and indiscriminate to carry substantial weight here. It says, in effect, that because some projects may fall away, this one should also be consented. That is not a site-specific need case. It does not demonstrate that East Pye Solar, with its exceptional local impacts and unresolved constraints, is the right scheme to fill any future shortfall. Still less does it demonstrate that the severe harms of this particular project are proportionate when cleaner, less constrained or already prioritised alternatives exist within the regional and national pipeline.	The Applicant refers to its response provided to BEPS-002 and BEPS-005. Further, Section 5.3 of the Statement of Need [APP-206] provides evidence on attrition in the UK's energy scheme development pipeline. This demonstrates that attrition is not an 'abstract and indiscriminate' concept but is instead one which the Government has recognised and addresses through its national policy position. For example: Paragraph 3.3.10 of NPS EN-1 states that <i>"it is prudent to plan on a conservative basis to ensure that there is sufficient supply of electricity to meet demand across a wide range of future scenarios,"</i> and Page 31 of the Clean Power 2030 Action Plan states that <i>"there is no singular path to achieving clean power,</i>

ID	Theme	Representation	Applicant's Response
			<i>but instead ... there are a range of scenarios that could get us there. Over time, there will be more clarity on which scenarios are most likely, depending on the outcomes of negotiations and other contract-award processes, and through monitoring delivery of assets with long lead-times, such as the transmission network, offshore wind, and nuclear. This new information will allow the pathway to 2030 to be refined over time, enabled where needed through prioritising connections offers, helping to determine the precise capacity mix required to deliver Clean Power 2030.</i> <i>Therefore, whilst the 'Clean Power Capacity Range' provides a foundation to guide rapid policy development and focus delivery, the scenarios developed now cannot be exhaustive or definitive, and it is only right that some optionality is retained. In the first instance, this means:</i> <i>... Government sets ranges for deployment of each technology by 2030 and will maintain some optionality</i>

ID	Theme	Representation	Applicant's Response
			<i>until more clarity on which scenario is most likely is available"</i> As set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.
BEPS-055	Statement of Need	BEPS's position is therefore that the Statement of Need overstates what national policy does for the applicant. National policy establishes a general need for low carbon infrastructure, but it does not relieve the applicant of the need to justify this Scheme in this location. Here, the applicant's own evidence shows that the relevant regional capacity ranges have already been met by prioritised schemes. The Statement of Need does not then supply a convincing site-specific reason why East Pye Solar is nevertheless required. Instead, it relies on generalised assertions about optionality, attrition and national urgency. It also does not model the likelihood of generation	The Applicant refers to its response provided to BEPS-002 and BEPS-005.

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		constraint of this scheme in this location, especially if it does not receive consent for a BESS. Other transmission regions are undersupplied with solar and do not have the same constraints as at this location. In BEPS's submission, generalised assertions of need are insufficient, particularly given the scale of unresolved objections on ecology, water, heritage, agriculture, transport, human health and deliverability. Accordingly, BEPS submits that the Examining Authority should treat the need case with caution. The Statement of Need may support solar in principle, but it does not demonstrate that East Pye Solar is necessary, proportionate or justified in regional terms once the existing prioritised pipeline and the Scheme's severe local impacts are properly taken into account.	
BEPS-056	Statement of Need Compulsory Acquisition	This is particularly the case, as here, where East Pye Solar significantly relies on Compulsory Purchase Powers to acquire the land from private individuals in order to build the scheme at all. This raises questions of the impact on human rights, where land is taken by compulsory purchase for a project that it not required in a specific location. The Applicant's case on compulsory acquisition is materially weakened by the absence of any demonstrated site-specific or regional need for East Pye Solar. Under section 122 of the Planning Act 2008 and the Government's compulsory acquisition guidance, the Secretary of State must be satisfied not only that the land	ES Volume 1, Chapter 5 - Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215] outline the approach to site selection undertaken by the Applicant. Paragraph 4.3.24 in NPS EN-1 provides: "<i>The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar</i>

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		is genuinely required for the development, but also that there is a compelling case in the public interest; the applicant must show that all reasonable alternatives, including modifications to the scheme, have been explored, that the interference with private rights is necessary and proportionate, and that no more land is being taken than is reasonably required. The guidance is explicit that compulsory acquisition may be refused even where development consent for the project itself could in principle be granted, including where the Secretary of State is not persuaded that all of the land sought has been shown to be necessary. In the present case, the Applicant's Statement of Need does not establish any locational necessity for this specific land take. Rather, it relies on a generic national policy case, acknowledges that NESO's Connections Reform process has already prioritised sufficient solar schemes to meet the relevant regional capacity ranges, and proceeds on the basis of 'optionality' rather than any identified T7 shortfall, while the BESS element remains only at Gate 1 with no confirmed future needs 'alignment' or connection date. In those circumstances, the compulsory acquisition case is not one of clear necessity for a uniquely needed scheme in this place, but of coercive acquisition of extensive areas of private land for one of many interchangeable projects said to contribute to a broad national pipeline. That is not enough to establish a compelling case in the public interest, particularly where the Scheme is highly	<i>infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals."</i> There is no general requirement in NPS EN-1 to consider alternatives or establish that the proposed Scheme represents the best option from a policy perspective. The Statement of Reasons [APP-020] sets out the reasons there is a compelling case in the public interest for the land or rights over the land to be compulsory acquired, for example, the meaningful and timely contributions offered by the Scheme to help meet the urgent need for new energy infrastructure in the UK, providing enhanced energy security and supporting UK Government priorities in relation to economic development and security of supply. The power to acquire the Order land or rights over the Order land and the power to impose restrictions are

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		constrained, environmentally contentious, and the Applicant has not shown why equivalent national benefits could not be achieved through alternative sites, reduced land take, or other schemes already in the pipeline. BEPS therefore objects that the extensive compulsory acquisition powers sought are unnecessary, disproportionate, and unsupported by the robust public-interest justification required by law.	required for the purposes of, to facilitate or are incidental to, the Scheme and are no more than are reasonably necessary. The Applicant recognises that the Draft DCO has the potential to infringe the human rights of people who own property or have rights in the land proposed to be acquired pursuant to the Draft DCO [AS-032]. The Statement of Reasons [APP-020] sets out that any infringement on human rights of those whose interests are affected by the inclusion in the DCO of powers of compulsory acquisition, is proportionate, necessary and legitimate and is in accordance with national and European law. Compensation is payable to anyone whose rights are extinguished, suspended or interfered with. The Applicant refers to its response to rows BEPS-002 and BEPS-005 above in relation to setting out the Applicant's position on the need for the Scheme. Further, within the context of an urgent need for an unprecedented capacity of

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			new low-carbon generation to meet Government's aims (NPS EN-1 Paragraph 2.3.3) it is clear that seeking to maximise the benefits arising from an individual scheme is aligned with the government's energy policy. The Applicant seeks to maximise the benefits arising from the Scheme from available and suitable land and through its contracted grid connection. The proposed Order Limits enable the Scheme to deliver the benefits identified in ES Volume 1, Chapter 6 - Climate Change [APP-042] and the requirement for that land is therefore justified as going towards meeting the need established in NPS EN-1. Such benefits may not be realised if compulsory acquisition powers are not granted. Including compulsory acquisition powers in the DCO ensure that there is no impediment to realising the public benefits of the Scheme. The purpose for which the land and rights are sought (to build and operate the Scheme) is legitimate, necessary and proportionate. The scope of the compulsory acquisition powers are

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			also suitably limited in nature and provide that statutory compensation would be payable.
BEPS-057	Draft DCO	The Draft DCO seeks powers and relies on deferred controls in a way that is not justified on the present evidence BEPS objects not only to the environmental effects of the Scheme, but also to the breadth of the draft Development Consent Order and the extent to which it relies on later approvals, later agreements, later licences and later management plans in order to make the Scheme appear implementable. The Explanatory Memorandum confirms that the Draft DCO is intended to authorise a very wide development envelope, including the generating station, BESS, substations, grid connection infrastructure, the new National Grid substation, mitigation and enhancement areas, highway works, and the full construction, operation, maintenance and decommissioning phases. It also makes clear that the powers in the Draft DCO include compulsory acquisition of land and rights, temporary possession, street works, access alteration, traffic regulation and other associated powers.	The Applicant refers to the response to BEPS-058.
BEPS-058	Draft DCO	Breadth of powers BEPS is concerned that the Order sought is broader than the present evidence justifies. This is not a case in which the applicant has demonstrated a fixed, fully evidenced and environmentally secure scheme and merely seeks the	The EIA presented within the ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides

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		legal mechanism to authorise it. Rather, the DCO is being used to authorise a wide envelope while leaving many matters central to environmental safety, legal compliance and practical deliverability to later stages. The Draft DCO therefore requires particularly careful scrutiny as part of the planning merits of the application, not merely as an administrative mechanism. The Order also seeks very extensive land powers. The Explanatory Memorandum confirms that the powers include compulsory acquisition of land and rights, temporary possession and related interference with private interests within the Order Limits. Those powers should only be granted where they are shown to be strictly necessary, proportionate and justified by a compelling case in the public interest. BEPS's position is that, on the current material, that threshold is not met. Where the environmental case remains heavily contested, deliverability remains contingent on later consents and agreements, and major species, water, transport and hazardous-risk questions remain unresolved, the coercive powers sought by the Order are premature and insufficiently justified.	guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent. ES Volume 1, Chapter 2 - Environmental Impact Assessment Methodology [APP-038] sets out for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained and has been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring the worse-case overall impacts are predicted. Each technical ES Volume 1 chapter [APP-042 to APP-054] describes the parameters applied in relation to the relevant assessment. As set out in ES Volume 1, Chapter 4 - The Scheme [APP-040], the extent and purpose of the design flexibility sought have been clearly defined and follow Advice Note Nine. The flexibility is targeted and proportionate, not an unrestricted ability to alter all aspects

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			of the Scheme. The maximum and minimum parameters of the Scheme are set out in Design Principles, Parameters and Commitments [APP-213] which are secured by Requirement 5 in the Draft DCO [AS-032]. The Applicant refers to the response at BEPS-056 in relation to BEPS comment regarding compulsory acquisition powers.
BEPS-059	Draft DCO Explanatory Memorandum	Deferral of critical controls BEPS is concerned that many matters central to the Scheme's acceptability are left to later discharge of Requirements and other later approvals. The Explanatory Memorandum shows that numerous important matters are to be dealt with after consent through Requirements, including detailed design approval, battery safety management, the landscape and ecology management plan, the protected species mitigation strategy, the biodiversity net gain strategy, drainage details, archaeology and the construction environmental management plan. That degree of deferral is particularly problematic in the case of East Pye Solar because major objections remain on water environment, private water supplies, hazardous risk, ecology, soils, transport, cumulative effects and	<u>The Scheme's Acceptability</u> The Planning Inspectorate's Advice Note Nine: Rochdale Envelope addresses the degree of flexibility that would be considered appropriate to deal with uncertainties associated with applications for development consent. The ES adopts the Rochdale Envelope approach to maintain flexibility in the design and layout of the Scheme in the DCO Application, to address uncertainties as identified in the ES, and to allow for advancements in technology from now to the time of construction. Not all technical details have been determined at this stage

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		deliverability. BEPS objects to the use of the DCO as a vehicle for postponing resolution of such issues to later stages, rather than demonstrating at Examination that the Scheme is already fixed, lawful, safe and deliverable in principle.	and will not be until after the granting of the Development Consent Order (DCO). This is important as the technology for solar photovoltaic (PV) and Battery Energy Storage Systems (BESS) continues to evolve. Therefore, maintaining flexibility to meet the changing demands of the UK market prior to Scheme construction enables the Applicant to adopt the most up to date technology at the point of commencement of development. This is also aligned with the Rochdale Envelope which ensures a robust assessment of the likely significant environmental effects of the Scheme. All technical chapters (ES Volume 1 Chapters 6 [APP-042] to 18 [APP-054]) will determine and assess the maximum parameters where flexibility needs to be retained as under the Rochdale Envelope approach. These parameters are considered in the ES to make sure a realistic worst-case assessment of the Scheme is undertaken.

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			Additionally, Paragraph 4.3.18 of NPS EN-1 states 'the Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some flexibility in the consent to account for uncertainties in specific project details'. Therefore, as is relevant for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring that worst case overall impacts are predicted. Each technical chapter describes the parameters applied in relation to the relevant assessment. <u>Controls</u> The Requirements contained within Schedule 2 to the Draft DCO [AS-032]

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			ensure that no part of the authorised development may commence until: • a written scheme setting out the phase or phases of construction; • a landscape and ecology management plan; • a protected species mitigation strategy; • a biodiversity net gain strategy; • details of all proposed temporary and permanent fences, walls or other means of enclosure; • a surface water drainage scheme; • an archaeological written scheme of investigation; • a construction environmental management plan; • a construction traffic management plan; • a public right of way and permissive path management plan; • a soil resource and management plan;

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			• an employment, skills and supply chain strategy; and • a site waste management plan; has been submitted and approved by the relevant planning authority, being South Norfolk Council or its successor in function as the relevant planning authority. This ensures that before the works are carried out, even if consented, the final details will be subject to appropriate scrutiny and in line with the assessments and conclusions set out in the Environmental Statement. Even once initially approved, Requirement 3(2) provides that the relevant planning authority must not approve any amendments to any approved document unless it has been demonstrated to the satisfaction of the relevant planning authority that the subject matter of the approval sought is unlikely to give rise to any materially new or materially different environmental effects in comparison with those reported in the

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			environmental statement. Breach of a Requirement is an offence. The approach is consistent with other development consent orders, including all recently made solar DCOs.
BEPS-060	Draft DCO Position Statement	Contingent deliverability and later consents The applicant's own Consents and Agreements Position Statement reinforces this concern. It expressly states that the intention of the Planning Act 2008 is to encourage as many consents as possible to be 'wrapped up' within a DCO as a 'one-stop-shop', including through disapplication of other consenting regimes and replacement with protective provisions and subsequent approvals. In BEPS's submission, that approach requires close scrutiny. The Position Statement lists a substantial further suite of consents and licences likely to be required outside the DCO itself, including environmental permits for water discharge, abstraction or impoundment licences, abnormal load permissions, section 61 construction-noise consent, health and safety related consents, protected species licences, hazardous substances consent, permit-scheme approvals, section 171 highway licences and potentially a new water connection application to Anglian Water.	The Applicant notes this comment. As stated in paragraph 1.3.6 of the Consents and Agreements Position Statement [APP-217], this is a tried and tested approach adopted in numerous local and public (hybrid) Acts, Harbour Act Orders, Transport and Works Act orders for many decades and which is now firmly established in the case of made DCOs.
BEPS-061	Draft DCO	The same document states that some necessary agreements with consenting bodies remain under discussion and that the applicant is merely 'confident' the	As stated in paragraph 1.3.6 of the Consents and Agreements Position Statement [APP-217] , this is a tried

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	Position Statement	necessary agreements will be obtained before or during Examination in exchange for protective provisions. That is not the same as demonstrating that the Scheme is presently shown to be deliverable, adequately controlled and environmentally acceptable. BEPS submits that too many matters central to construction feasibility, environmental protection and lawful operation remain contingent rather than secured.	and tested approach adopted in numerous local and public (hybrid) Acts, Harbour Act Orders, Transport and Works Act orders for many decades and which is now firmly established in the case of made DCOs. Please refer to the Applicant's response to BEPS-059. This explains how the scheme is adequately controlled and environmentally acceptable.
BEPS-062	Draft DCO Position Statement	The applicant also seeks disapplication of separate regulatory controls on the basis that the relevant matters will already have been sufficiently considered and resolved if the DCO is made, particularly in relation to drainage, water resources and environmental permitting, and that they should not be the subject of further regulatory consideration because that would cause uncertainty and delay. BEPS objects to that approach. In a scheme with unresolved water, pollution, drainage, groundwater and private water supply issues, it cannot simply be assumed that those matters have been sufficiently resolved in principle and should therefore be displaced into protective provisions or reduced regulatory pathways.	As stated in paragraph 1.3.6 of the Consents and Agreements Position Statement [APP-217] , this is a tried and tested approach adopted in numerous local and public (hybrid) Acts, Harbour Act Orders, Transport and Works Act orders for many decades and which is now firmly established in the case of made DCOs. Please refer to the Applicant's response to BEPS-059. This explains how the scheme is adequately controlled and environmentally acceptable. The Applicant also remains in close discussions with the authorities that

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			would ordinarily be responsible for granting approvals under the regimes which are sought to be disappplied. Pursuant to section 150 of the Planning Act 2008, the Applicant is seeking the consent of the relevant approving bodies for any consents or authorisations that are prescribed. This approach ensures that the DCO seeks to be a one-stop-shop consent, as recognised by BEPS, whilst ensuring appropriate protection for key stakeholders (through the protective provisions) and without circumventing the need for their agreement (through the consent to disapplication process).
BEPS-063	Draft DCO Protected Species	Protected species licensing, including barbastelles BEPS is also concerned that the Draft DCO and associated consents material do not confront the protected species licensing issue with the degree of specificity required by the ecological constraints of this Scheme. The Consents and Agreements Position Statement refers only in general terms to a 'Protected Species Licence', stating that Appendix 8.10 identifies in what circumstances protected species licences may be required and that, if required, applications are to be made by the contractor prior to commencement. The Explanatory Memorandum likewise relies on a pre-commencement protected species	ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] clearly sets out the circumstances in which a protected species licence would be required. The strategy also acknowledges the instances where it would be necessary to delay commencement of the Scheme until a licence has been secured. As acknowledged by BEPS, Requirement 8(2) provides that the

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		mitigation strategy, substantially in accordance with the Outline Protected Species Mitigation Strategy, but does not identify any project-specific European Protected Species licensing pathway within the Requirement itself.	detailed protected species mitigation strategy must be substantially in accordance with the outline protected species mitigation strategy. Requirement 8(3) provides that the protected species mitigation strategy must be implemented as approved by the relevant planning authority in consultation with the relevant statutory nature conservation body. Therefore, should a licence be required, it would be a breach of requirement to not obtain a licence which is an offence. This is in addition to breach of the relevant species legislation. As stated in paragraph 1.3.6 of the Consents and Agreements Position Statement [APP-217], this is a tried and tested approach adopted in numerous local and public (hybrid) Acts, Harbour Act Orders, Transport and Works Act orders for many decades and which is now firmly established in the case of made DCOs. However, the Scheme has sought to ameliorate the dependence on protected species licencing by avoiding

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			impacts to key habitats which support species, specifically ancient woodland, and other trees which may support bats, including the rare Barbastelle. Stand-off distances to watercourses will similarly avoid disturbance to otters and other aquatic species which otherwise might require a licence for disturbance. These embedded measures are set out in the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. In their Relevant Representation [RR-1410] Natural England identifies the potential requirement for licences relating to water voles/otters, great crested newts, roosting bats and badger sett closures and encourages the Applicant to engage with the Discretionary Advice Service (DAS) at the earliest opportunity. The approach will be advanced post consent.
BEPS-064	Draft DCO	That generic treatment is inadequate in the context of BEPS's barbastelle case. The Natural England / PINS	The Applicant acknowledges the presence of Barbastelle Bat colonies

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	Protected Species	scoping material in the file set states, in general terms, that a separate protected species licence from Natural England or Defra may be required, and that where licence need is identified applicants should use Natural England's pre-submission screening service so that Natural England can review a full draft licence application and issue a Letter of No Impediment ('LONI'), thereby giving the Planning Inspectorate confidence in recommending grant of a DCO. In BEPS's submission, that is highly material here. Given the scale of the barbastelle constraints already raised, the application should not proceed on the basis of a generic future protected species licensing statement while leaving the existence, scope and grantability of any barbastelle EPS licence to later contractor-led steps.	surrounding the Order Limits and has considered the core sustenance zone within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Scheme designs primarily utilise intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular ploughing, tilthing, harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including Barbastelle bat maternity roosts), therefore, land utilised for the Scheme is currently subject to regular disturbance, with the proposals considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance

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			to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] include the retention and enhancement of field boundary features (hedgerows/ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including Barbastelle bats. It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for an EPSML for Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would result in: (a) to impair their ability—

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			• to survive, to breed or reproduce, or to rear or nurture their young; or • in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) to affect significantly the local distribution or abundance of the species to which they belong. The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157] have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the CSZ's of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. The Applicant agrees that there are potentially other woodlands in the wider landscape, and outside the DCO limits, that support further colonies of Barbastelle bats. As a precautionary measure, the embedded design principles adopted and detailed within

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			the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits have and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status.
BEPS-065	Draft DCO	Overall position on the Draft DCO Finally, BEPS is concerned that the combined effect of the Draft DCO, the Explanatory Memorandum and the Consents and Agreements Position Statement is to normalise a high level of contingency, deferral and regulatory substitution. The applicant presents this as standard NSIP practice. However, for a scheme as environmentally constrained and legally contentious as East Pye Solar, the Examination should not assume that	The Applicant notes this comment. The Applicant refers to its response to BEPS-059. This explains how the scheme is adequately controlled and environmentally acceptable.

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		because such mechanisms exist, they are appropriate here. The key question is not whether these drafting techniques have precedent, but whether they lawfully and satisfactorily address the real risks of this particular Scheme. BEPS submits that they do not. Accordingly, BEPS objects to the Draft DCO on the basis that the powers sought are broader than the present evidence justifies; too many matters central to environmental protection, species licensing, water safety, hazardous risk, highways and construction impacts are left to later approvals or later consents; important agreements and regulatory pathways remain contingent rather than secured; and the Draft DCO does not presently provide confidence that the Scheme can be implemented, operated and decommissioned lawfully, safely and acceptably.	
BEPS-066	Funding	Funding, compulsory acquisition and financial security BEPS is further concerned that the applicant's Funding Statement does not provide the level of certainty that would justify the extensive compulsory acquisition and related powers sought. The document states that the current estimated cost of the Scheme is approximately £1 billion to £1.05 billion, including construction, land acquisition and compensation costs. However, it also states that, if development consent is granted, the applicant would only then 'seek further funding' with the support of legal and financial advisers, that no final decision has yet been taken on the type of finance to be used, and that the final	The Funding Statement [APP-021] sets out that the Scheme is a privately financed development, which is the standard model for delivering large-scale energy infrastructure in Great Britain. This model enables the development of essential low-carbon infrastructure without reliance on public funds. Funders require certainty and for that reason it is to be expected that the

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		investment decision would be made only once the DCO is granted. In BEPS's submission, that means the project is not presented on the basis of fully secured financing, but on the basis of anticipated future finance following consent. That may be common in privately funded infrastructure, but in this case it is highly material because the Draft DCO seeks compulsory acquisition powers over a very large and environmentally sensitive scheme whose deliverability, water supply, species licensing, grid dependence and long-term viability remain contested. BEPS does not consider it satisfactory to confer coercive land powers first and leave the project's final financing structure and investment decision until later.	financing will only be in place once the DCO is granted. Moreover, in respect of compulsory acquisition which appears to be a specific concern of BEPS in relation to funding, Article 48 of the Draft DCO sets out that the undertaker must not exercise compulsory powers unless it has first put in place either a guarantee or other alternative form of security.
BEPS-067	Farm businesses	The applicant has not adequately assessed the consequences for farm businesses if compulsory acquisition of freehold land is exercised. Compensation rights do not answer the planning question of whether established agricultural businesses remain viable once land is permanently taken. That omission is particularly serious where the applicant's own Appendix 15.2 Farm Locations shows losses of substantial proportions of utilised land for a number of businesses and yet excludes the Cable Route Corridor from the farm business assessment.	The Applicant refers to its response to BEPS-068 for a justification for CA powers. In terms of the effects on farm businesses from the cable route construction, there will be short-term disruptions which will be subject to compensation. Once cable works are complete, the landowner will then be able to continue to use their land for agricultural purposes.

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BEPS-068	Compulsory Acquisition	The Funding Statement also confirms that the applicant has already secured option agreements over the Sites making up the majority of the Order Limits, but says compulsory acquisition powers are still required 'to ensure that the Scheme can proceed without impediment.' BEPS objects to that approach. Where the environmental case remains heavily disputed and the project depends on substantial future consents, later licences, later agreements and later finance, the case for granting compulsory acquisition powers requires especially strict scrutiny.	The Applicant confirms that East Pye Solar Limited has entered into option agreements with landowners. These agreements put in place legally binding obligations to lease land that is being proposed for solar panels, substations, energy storage and other associated development that is part of the Scheme. These agreements are industry standard and provide landowners with certainty and protection over the use of their land while securing development rights for the Scheme. However, as set out in the Statement of Reasons [APP-020] and as is typical for NSIP projects, it is necessary for the Applicant to seek compulsory acquisition powers in the DCO so as to protect against a scenario whereby contracts are not adhered to or are otherwise set aside, for example: (i) freeholder owners of the land (where agreement has been reached) do not grant a lease of the land in accordance with the terms of the completed option agreements; or (ii) the contracting party dies, is subject

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			to divorce proceedings, or is declared insolvent. In those circumstances, it would be in the public interest for the Scheme to proceed and the interests in question effectively converted into a claim for compensation. The Applicant also needs powers to suspend rights and override easements and other rights in the land to the extent that they would conflict with the Scheme. The terms of the Option Agreements contractually restrict the exercise of any compulsory acquisition powers except in limited circumstances, such as if the landowner fails to comply with the terms of the Option Agreement.
BEPS-069	Funding	Although the Funding Statement says the Draft DCO includes an article preventing exercise of compulsory acquisition powers until the Secretary of State has approved a form of security from the applicant, that appears directed to compulsory acquisition compensation and not to the wider problem of long-term decommissioning, restoration, insolvency or abandonment risk. BEPS remains concerned that the application identifies no ring-fenced, insolvency-proof financial security for decommissioning and site restoration over the lifetime of the Scheme. In a 60-year project involving extensive buried infrastructure, substations, BESS, repeated	The Applicant confirms that, if consent is granted, they have the capability to build, own and operate the Scheme. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker is defined in the DCO and will remain bound by the legally enforceable requirements of the DCO. As such it would be an offence if the undertaker at the point of

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		replacement cycles and major restoration liabilities, that omission is material.	decommissioning, did not fulfil the requirements as set out in the DCO, including Requirement 21 decommissioning and restoration. The Funding Statement [APP-021] submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full. The Draft DCO [AS-032] then secures a Requirement for decommissioning and restoration to ensure that the Scheme is decommissioned at the end of the 60-year operational lifetime. The Applicant's firm position is that a Requirement for a decommissioning fund is not necessary or reasonable in all aspects, and therefore this requirement does not meet the tests required by the DCO Guidance and reiterated in national policy. This position is supported by the SoS decision making in the Oakland Solar Park. The SoS' Decision Letter [see 4.38 – 4.45] confirms – by reference to the decommissioning and restoration

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			requirement in the DCO and outline decommissioning plan – that “<i>the Secretary of State considers that sufficient information has been provided... to demonstrate how decommissioning would be secured and how the application site land would be returned to the beneficial use of the landowners</i>”. Comparably, Requirement 21 secures decommissioning of East Pye (as set out above). The Outline DEMP [APP-198] secured under the Requirement also includes a commitment that “<i>When the operation phase ends, the Scheme would be decommissioned and the land returned to the landowner.</i>” As such, the circumstances are comparable to Oaklands Solar Park and no separate “ring-fenced, insolvency-proof financial security” is necessary.
BEPS-070	Funding	BEPS submits that insolvency or abandonment risk is plainly a relevant planning consideration for a 60-year project of this scale involving extensive buried infrastructure, substations, BESS, repeated replacement	The Applicant refers to its response to BEPS-069.

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		cycles and significant end-of-life liabilities. The applicant's own Funding Statement shows that final financing remains contingent and post-consent. In those circumstances, the absence of any ring-fenced, enforceable and insolvency-proof decommissioning security is a material omission. Accordingly, BEPS objects that the application fails to demonstrate that landowners, local authorities and the public purse would be protected in the event of insolvency, project failure or early abandonment. No compulsory acquisition powers, and no confidence in the claimed temporary and reversible nature of the Scheme, should be accepted without a secured and durable financial mechanism guaranteeing full decommissioning and restoration.	
BEPS-071	Commitments Register	Cross-cutting point on the Commitments Register BEPS notes that the applicant's Commitments Register expressly states that it 'is not a secured document' and serves only as a register intended to track commitments through to other purported securing mechanisms. In BEPS's submission, this is significant because it shows, chapter by chapter, how much of the applicant's mitigation case depends on later detailed design, later surveys, later management plans and later approvals rather than on fixed and presently examinable controls. The Register therefore reinforces BEPS's wider concern that the application relies	The Commitments Register [AS-038] has been prepared in line with PINS guidance <i>Nationally Significant Infrastructure Projects: Commitments Register</i> and is used as a signposting tool to track commitments made by the applicant throughout the NSIP planning process, with such commitments then secured in other documents. The Design Principles, Parameters and Commitments [APP-213] set out

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		excessively on deferral and does not yet demonstrate a fully resolved, secured and deliverable scheme.	the maximum and, where necessary, minimum parameters with the spatial extents shown on the Works Plan [AS-002 and AS-003]. The Scheme has Work No's as described in Schedule 1 of the Draft DCO and does not have a detailed design at this stage. The Applicant is seeking flexibility in design parameters to allow for technological advancement to maximise energy production. For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and allow for a decision on the technology choice to be made at the point of procurement. The Planning Inspectorate's Advice Note Nine: Rochdale Envelope acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely reasonable worst-

ID	Theme	Representation	Applicant's Response
			case scenario for the likely significant environmental effects of the Scheme to be considered. The proposed management and mitigation measures set out in the ES [APP-036 to APP-195] are secured through various outline management plans [APP-196 to APP-205]. The detailed management plans will be substantially in accordance with the outline management plans and are secured through Schedule 2 of the Draft DCO [AS-032]. These detailed management plans will be submitted to and approved by the relevant planning authority.
BEPS-072	Commitments Register	Ecology / BNG / protected species The Commitments Register shows that the ecology case depends heavily on future control documents and future ecological input rather than a fully resolved application-stage position. It relies on the Outline PSMS, Outline LEMP, later ECoW attendance, task-specific method statements, seasonal restrictions, pre-decommissioning surveys and even an updated PSMS at the decommissioning stage. It also states that BNG is to be secured through the Outline LEMP and Requirement 9, but in broad, management-led terms rather than as a fixed and	The Outline CEMP [APP-196], the Outline OEMP [APP-197], the Outline DEMP [APP-198], the Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] are designed with the objective of securing the relevant ecological mitigation measures. The plans also set out monitoring and reporting

ID	Theme	Representation	Applicant's Response
		fully evidenced package. In BEPS's submission, this reinforces concern that protected-species mitigation, BNG delivery and long-term ecological management remain contingent and deferred.	arrangements to ensure mitigation measures remain effective. These outline management plans establish a framework for the details to be secured through the DCO Requirements. The outline nature of the management plans reflects the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. The Green Infrastructure Strategy [AS-005] demonstrates the proposed landscape and ecological measures, with the prescriptions and the management of ecological measures set out in the Outline LEMP [APP-199]. The Biodiversity Net Gain Report [APP-218] demonstrates that the Scheme is able to deliver a net gain in biodiversity based on the Green Infrastructure Strategy [AS-005]. BNG is secured through Requirement 9 of the Draft DCO [AS-032].

ID	Theme	Representation	Applicant's Response
BEPS-073	Commitments Register	Water environment The Commitments Register reinforces BEPS's concern that the water environment case depends on assumptions, outline documents and later approvals rather than settled safeguards. It refers to bunding, lined SuDS, shut-off valves, firewater tankering, tankered foul water, water neutrality options, drainage maintenance, flood-zone siting, access-track design and BESS/substation runoff controls, but these are largely to be secured through later OEMP, BSMP, drainage-scheme and detailed-design stages. In BEPS's submission, that is particularly significant given the unresolved issues on chalk streams, private water supplies, aquifer pathways, pollutant containment and water-supply feasibility.	An assessment of the Water Environment is provided within ES Volume 1, Chapter 9 – Water Environment [APP-045], which also identifies mitigation measures. The outline management plans [APP-196 to APP-205] are designed with the objective of securing the relevant environmental mitigation measures set out within the ES. These outline management plans establish a framework for the details to be secured through the DCO Requirements. The outline nature of the management plans reflects the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. The detailed management plans will be substantially in accordance with the outline management plans and are secured through Schedule 2 of the Draft DCO [AS-032]. These detailed management plans will be submitted to and approved by the relevant planning authority.

ID	Theme	Representation	Applicant's Response
			Paragraph 2(4) of Schedule 15 to the Draft DCO [AS-032] requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that any mitigation measures identified in the ES are contained in the final plans or an explanation is provided as to why there is a change (for example, if a mitigation measure is no longer required as technology has advanced and the impact will no longer occur).
BEPS-074	Commitments Register	Transport and access / PRow The Commitments Register shows that major elements of the transport case remain to be settled later through the final CTMP, OTMP and PRowWPPMP. It repeatedly states that routes, haul roads, trenchless crossing approaches, replacement-traffic controls, traffic caps and PRow management will be addressed through later detailed versions of those documents. This supports BEPS's submission that the traffic, access, panel-replacement and PRow impacts are not yet fixed in a form that can be fully examined.	ES Volume 1, Chapter 11 - Traffic and Access [APP-043] and ES Volume 3, Transport Assessment [APP-174 to 177] presents an assessment of the Scheme on traffic and access. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and allow for design flexibility. Mitigation measures and management of traffic and access are set out in the

ID	Theme	Representation	Applicant's Response
			Outline CTMP [APP-201] and Outline OTMP [APP-202] and the management of PRoW is described in Outline PRoWPPM [APP-203] to minimise impacts as far as practicable. These outline management plans establish a framework for the details to be secured through the DCO Requirements. The outline nature of the management plans reflects the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. Detailed CTMP, OTMP and PRoWPPM will be submitted to and approved by the relevant planning authority in accordance with Requirements 15, 16 and 17 of the Draft DCO [AS-032].
BEPS-075	Commitments Register	Noise and vibration The Commitments Register is relevant to noise because it records that the assessment of operational inverter noise could, on the assumptions applied, exceed LOAEL and NOAEL thresholds, and says that further mitigation could include quieter inverter models, acoustic enclosures, relocation, reorientation of plant or installation of barriers, subject to further detailed design. In BEPS's submission,	The following commitments are included in the Outline OEMP [APP-197]: Noise from the BESS will achieve the predicted sound levels in ES

ID	Theme	Representation	Applicant's Response
		that indicates that the final mitigation necessary to avoid significant effects has not yet been settled.	Volume 1, Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on PROWs will not exceed 55 dBA. The commitments demonstrate that significant adverse effects will be avoided and that adverse effects will be mitigated and minimised.
BEPS-076	Commitments Register	Cultural heritage / archaeology The Commitments Register is relevant to heritage not only because it lists numerous setbacks and planting measures relied on as mitigation, but also because it confirms that geophysical survey, informative trenching, geoarchaeological assessment, excavation and watching briefs remain to be targeted or completed following detailed design. In BEPS's submission, this reinforces concern that archaeological understanding and mitigation remain contingent and that the heritage case continues to rely heavily on later work and on planting-based screening.	The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of archaeological works will be carried out within the Scheme, including geophysical survey. Informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHEs that

ID	Theme	Representation	Applicant's Response
			the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. Further works may also be required within the Scheme, including geoarchaeological assessment and archaeological excavation, which has also been discussed within the Archaeological Mitigation Strategy.
BEPS-077	Commitments Register	Soils and agricultural land The Commitments Register confirms that soil protection depends mainly on the Outline SRMP, later micro-siting and general good-practice controls on trafficking, timing and reinstatement. It does not convert the applicant's soils case into quantified, durable safeguards dealing with the long-term effects of compaction, repeated access, replacement cycles and restoration certainty. In BEPS's submission, this reinforces the wider concern that the soils case remains management-led rather than firmly evidenced and secured.	Soil, as a resource, is assessed within ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. Measures for the management and handling of soils, including the reinstatement of soils, are described in the Outline SRMP [APP-204]. With the exception of the National Grid Substation and Grid Connection Infrastructure, the soil and land conditions will be returned to its original use and condition as far as practicable. Outline management plans establish a framework for the details to be secured through the DCO Requirements. The outline nature of the management plans reflects the

ID	Theme	Representation	Applicant's Response
			need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. In accordance with Requirement 18 of the Draft DCO [AS-032], a detailed SRMP will be submitted to and approved by the relevant planning authority.
BEPS-078	Commitments Register	Ground conditions The Commitments Register is particularly relevant to ground conditions because it states that intrusive ground investigations, UXO follow-up, foundation works risk assessments and hydrogeological risk assessments for trenchless crossings may all be undertaken post-consent or prior to construction. In BEPS's submission, that shows that important parts of the contamination, groundwater and construction-risk case are still to be established later, rather than demonstrated now at application stage.	The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). As described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] "As discussed at a meeting with the EA on 27 March

ID	Theme	Representation	Applicant's Response
			<i>2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent".</i>
BEPS-079	Commitments Register	Major accidents and disasters / BESS The Commitments Register reinforces BEPS's major-accident concerns by showing that the BSMP, emergency response planning, utility easements, later detailed design and post-consent investigations sit at the centre of the mitigation case. That indicates that the control of fire, hazardous incidents, utility interactions and other major-accident pathways is still substantially dependent on future plans and future approvals rather than a fully fixed application-stage design.	ES Volume 1, Chapter 18 - Other Environmental Matters [APP-053] presents an assessment of the Scheme on major accidents and disasters and identifies relevant mitigation and control measures. The Outline Battery Safety Management Plan(Outline BSMP) [APP-200] outlines the key fire safety provisions for the BESS, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. The Outline BSMP [APP-200] identifies how the Applicant will use good industry practice to reduce risk to life, property, and the environment from the BESS. The Outline BSMP [APP-200] outlines the key fire safety provisions for the BESS,

ID	Theme	Representation	Applicant's Response
			including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. The Outline BSMP [APP-200] identifies how the Applicant will use good industry practice to reduce risk to life, property, and the environment from the BESS. As detailed in the Design Principles, Parameters, and Commitments, the Containers/Compounds will be a minimum of 200m from the closest residential property. The design of the Scheme has been undertaken in accordance with relevant guidance and equipment will be selected to meet required safety standards. As set out in the Outline OEMP [APP-197], all works will be undertaken in accordance with relevant Health and Safety legislation and guidance. Details of fire, police, emergency services, and hospitals will be publicised and included in the site induction. An Emergency Response

ID	Theme	Representation	Applicant's Response
			Plan would be followed in the event of fire. As set out in the Outline CEMP [APP-196] and Outline DEMP [APP-198], all works will be undertaken in accordance with relevant Health and Safety legislation and guidance. Details of fire, police, emergency services and hospitals will be publicised and included in the site induction. The relevant risk assessments for safety during construction/ decommissioning will be required and produced by the Contractor prior to construction /decommissioning, which will be implemented to minimise the risk of accidents and disasters on site. The Draft DCO [AS-032] includes protective provisions for the protection of electricity, gas, water and sewerage undertakers, operators of electronic communications code networks, and drainage authorities, as well as bespoke provisions for certain statutory undertakers with apparatus within the Order Limits.

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BEPS-080	Commitments Register	Waste / decommissioning / temporary nature The Commitments Register is also relevant to BEPS's decommissioning and restoration concerns. It shows that decommissioning will depend on a future detailed DEMP, future SWMPs, future authorised reproprocessors and future market conditions, and it confirms that National Grid substation and grid connection infrastructure are not proposed to be decommissioned. In BEPS's submission, this weakens the applicant's reliance on the project being straightforwardly "temporary" and reinforces the concern that long-term restoration remains both operationally and financially uncertain.	Mitigation measures for the decommissioning phase are provided within the Outline DEMP [APP-198]. The Outline DEMP is designed with the objective of securing the relevant environmental mitigation measures set out within the ES. Any additional licences, permits or approvals that are required will be listed in the detailed DEMP. At the end of the Scheme's operational life, apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned and the land returned to the landowner, as set out in the Outline DEMP [APP-198]. Post-decommissioning, the landowners would choose how the land is to be used and managed. The approach to decommissioning for the cables would be dependent upon Government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to

ID	Theme	Representation	Applicant's Response
			overlying land and habitats and to neighbouring communities. Outline management plans establish a framework for the details to be secured through the DCO Requirements. The outline nature of the management plans reflects the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. A detailed DEMP will be prepared substantially in accordance with the Outline DEMP [APP-198] and must be submitted to and approved by the relevant planning authority prior to the commencement of decommissioning. This is secured through Requirement 21 in Schedule 2 of the Draft DCO [AS-032].
BEPS-081	Potential Main Issues for Examination	Potential Main Issues for Examination Document. The concern with the Non-Technical Summary (NTS) is not merely that it is simplified, but that its simplification mirrors the underlying weakness of the application as a whole. Across ecology, water environment, soils and BMV land, heritage and archaeology, transport, noise, ground	The Non-Technical Summary [APP-194] summarises the findings of the Environmental Statement in a form accessible to interested parties, in accordance with the EIA Regulations.

ID	Theme	Representation	Applicant's Response
	Non-Technical Summary of the Environment Statement	conditions, human health and major accident risk, the NTS repeatedly presents matters as controlled by embedded mitigation and largely non-significant effects, whereas the chapter evidence and associated application documents show continuing dependence on deferred surveys, deferred design, outline plans, future licences, future agreements and matters expressly left to Examination or post-consent stages. This is reinforced by the applicant's own Commitments Register, which is not a secured document, and by the Potential Main Issues for Examination document, which acknowledges a range of unresolved issues with statutory consultees at submission stage. The NTS should therefore not be treated as a reliable standalone account of environmental acceptability	See responses provided herein regarding the content of the ES. With regard to the Potential Main Issues for Examination [APP-208], this document has been prepared in accordance with the Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (September 2024) and Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Its purpose is to provide the Examining Authority with a summary of the main residual issues with key stakeholders remaining at the time of submission, in a transparent manner. As set out in the Potential Main Issues for Examination [APP-208], the Applicant anticipates that a number of the issues identified may be resolved between submission and Examination. The identification of ongoing engagement with statutory consultees does not indicate any material deficiency in the DCO Application itself, but reflects the ordinary and expected progression of

ID	Theme	Representation	Applicant's Response
			stakeholder engagement through the Examination stage.
BEPS-082	Habitats Regulations Assessment	Habitats Regulations Assessment Habitats Regulations Assessment – Summary of Objection The applicant's conclusion that the Scheme will have no likely significant effect on European sites is not supported by sufficient evidence and is not legally robust. The Scheme affects a dense and interconnected network of watercourses across the Order Limits and cable route corridor. Appendix 8.9 identifies 21 waterbodies within or adjacent to the Scheme and confirms that these form part of hydrologically connected systems, including: • Hempnall Beck and tributaries within the River Tas (chalk stream) system; • Starston Brook, Broome Beck and associated ditch networks within the River Waveney catchment; • and extensive field ditch networks which link these systems and provide seasonal connectivity. The applicant's own evidence therefore establishes that the Scheme does not affect isolated receptors, but instead lies within connected catchment-scale hydrological systems.	The European Sites are located at a distance from the Scheme and are situated at a higher elevation, and/or are within a different catchment such that no hydrological connectivity has been identified. Sites have been selected which are within 10km of the scheme as this represents the extent of likely impacts associated with this type of development, for example temporary pollution caused by siltation and run off during construction; loss of functionally linked land to qualifying bird species occupying Broadland SPA. On consideration of the sites within 10km, there are no hydrological links which would allow pollution, siltation, changes in water levels or hydrological changes to the European Sites as a result of works during construction, operation (and maintenance) or decommissioning.

ID	Theme	Representation	Applicant's Response
		The same appendix explicitly relies on this connectivity to infer ecological value, including the use of Environment Agency data from hydrologically connected downstream sites to predict fish and invertebrate assemblages. However, while connectivity is used to support ecological presence, it is not used to assess impact propagation. There is no modelling or assessment of how sediment, pollutants, or hydrological changes would move through these connected systems.	The Screening Assessment within the Shadow Habitat Regulations Assessment (sHRA) Report [AS-036] found no mechanism for impacts to internationally designated sites and the sHRA did not proceed to the Appropriate Assessment Stage. The hydrological connectivity to Internationally designated sites has been established within ES Volume 1, Chapter 9 - Water Environment [APP-045]. In its Relevant Representation, Natural England has agreed with the conclusion of the HRA that there are no likely significant effects to European Sites.
BEPS-083	Habitats Regulations Assessment	The assessment is further undermined by its acknowledged limitations. It is a habitat-led appraisal only, with no direct species surveys, undertaken during unusually dry conditions, with many watercourses dry or only partially flowing at the time of survey. Ephemeral ditches and headwaters—despite being recognised as potentially important seasonal pathways for aquatic organisms—are not fully assessed.	The aquatic ecology assessment adopted a habitat-led approach, informed by the availability of appropriate desk study records, as set out within ES Volume 3: Appendix 8.9 – Aquatic Habitat Assessment [APP-160]. The Aquatic Habitat Assessment explicitly acknowledged that surveys

ID	Theme	Representation	Applicant's Response
		This means that the ecological baseline is incomplete and biased, and the role of the wider hydrological network under normal or wet conditions is not properly understood.	were undertaken during a period of unusually dry conditions and identified this as a limitation of the baseline dataset. However, the assessment did not rely solely on the presence or absence of water during the survey period. Instead, watercourses were assessed based on habitat characteristics, hydrological connectivity, channel morphology, aquatic vegetation and their function within the wider catchment. Importantly, watercourses displaying evidence of periodic flow, hydrological connectivity or aquatic function were retained within the assessment, even where they were dry or only partially wetted at the time of survey. The assessment therefore distinguished between genuinely ephemeral or seasonally functioning watercourses and channels with little or no aquatic ecological function. A precautionary approach was also adopted when considering species occurrence. Where aquatic species were identified through desk-study records within hydrologically connected

ID	Theme	Representation	Applicant's Response
			watercourses, these species were considered within the assessment where a plausible pathway existed, regardless of whether individual ephemeral channels would be capable of supporting the full range of species recorded elsewhere in the catchment. As such, the assessment intentionally incorporated a precautionary consideration of species potentially associated with the wider hydrological network. This approach increases the robustness of the assessment and reduces the likelihood of ecological effects being underestimated. [ES - Volume 1: Chapter 8 – Ecology and Biodiversity [APP-044] The Applicant therefore remains satisfied that the aquatic ecology assessment provides a robust and representative evaluation of aquatic habitats and species within the study area and appropriately accounts for the ecological role of both perennial and ephemeral watercourses.

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BEPS-084	Habitats Regulations Assessment	The appendix also confirms the presence of clear impact pathways, including sediment release, pollution events, changes to flow and drainage, and disturbance associated with construction works. It further recognises that the River Tas waterbody already contains failing Water Framework Directive elements, and that deterioration must be avoided. Despite this, there is: • no catchment-scale assessment of cumulative effects; • no downstream transport modelling; • no assessment of effects on connected receptors; • and no demonstration that impacts would not propagate through the Tas or Waveney systems Under the Habitats Regulations, the test at screening stage is whether likely significant effects can be excluded on the basis of objective information. On the applicant's own evidence, they cannot. The Scheme introduces multiple impact pathways across interconnected catchments, including a chalk stream system of high sensitivity, and the consequences of that connectivity have not been assessed. Accordingly, the conclusion of no likely significant effect is not supported by sufficient evidence. A more rigorous assessment is required.	The Applicant refers to its response to BEPS-082

ID	Theme	Representation	Applicant's Response
BEPS-085	Habitats Regulations Assessment	Figure 8.1 demonstrates that the Order Limits lie within 10 km of multiple European sites including The Broads SAC/Broadland SPA/Ramsar and Norfolk Valley Fens SAC. However, the Applicant treats this as a simple distance-based assessment. This is fundamentally flawed. The Site lies within a hydrologically connected landscape, including the River Tas chalk stream system, and Broome Beck, which drain into the River Yare and the Broads SAC, and the river Waveney chalk stream catchment. Chalk geology is highly permeable and supports both surface and groundwater connectivity. The presence of a confirmed breeding white-clawed crayfish population upstream in the Tas further demonstrates the sensitivity of this system and the requirement for precautionary assessment. In these circumstances, there is a clear and plausible pathway for sediment, pollution, and hydrological change to affect European sites. The Applicant has not provided sufficient evidence to exclude likely significant effects. Reliance on distance-based screening is therefore contrary to the Habitats Regulations and established case law, and an Appropriate Assessment is required.	The Applicant refers to its response to BEPS-082 which sets out the reasoning for the 10km buffer.
BEPS-086	Habitats Regulations Assessment	Failure of Habitats Regulations Screening The Applicant has not lawfully screened out likely significant effects on European sites. The problem is not simply one of missing detail. It is that the evidence now available shows clear and plausible pathways by which East Pye Solar may affect the integrity of European sites,	The Applicant refers to its response to BEPS-082. The Broads SAC and Broadland Ramsar lies within the Yare (Wensum to tidal) WFD waterbody catchment.

ID	Theme	Representation	Applicant's Response
		yet the assessment continues to rely on distance, generic mitigation and incomplete baseline evidence. Figure 8.1 confirms that the Order Limits lie within 10 km of multiple European sites, including The Broads SAC / Broadland SPA / Ramsar complex to the north-east and Norfolk Valley Fens SAC to the west. The map on page 1 shows the Scheme centrally located within that wider designated landscape rather than isolated from it. The significance of that figure is not merely spatial proximity. It is that the Scheme sits within a wider ecological and hydrological system connected to those sites. The Planning Inspectorate's Scoping Opinion already identified this problem. It expressly declined to scope out effects on Norfolk Valley Fens SAC, The Broads SAC and Broadland Ramsar because hydrological connectivity had not been ruled out. It also required a Water Framework Directive assessment or screening assessment, and required identification and assessment of private water supplies where significant effects may occur. The applicant was therefore on clear notice that a distance-based exclusion was insufficient.	The Norfolk Valley fens SAC lies within the Tributary of Tas WFD waterbody catchment. Although these catchments are not directly assessed in the ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] the assessment considers impacts to all WFD waterbody catchments which lie between the Order Limits and these WFD water bodies. The Chet WFD water body lies between the Order Limits and the Yare (Wensum to tidal) catchment. The Hempnall Beck, Tas (Head to Tasburgh) and Tas (Tasburgh to R. Yare) catchments lie between the Order Limits and the Tributary of Tas catchment. Impacts and mitigation within these catchments are discussed in the WFD assessment which would minimise or prevent impacts to the catchments containing the protected areas.
BEPS-087	Habitats Regulations Assessment	That concern is reinforced by the hydrological evidence. East Pye lies within a chalk-stream landscape, including the River Tas system, with downstream connectivity	The Applicant notes the Examining Authority's (ExA) request for further information and potentially for surveys

ID	Theme	Representation	Applicant's Response
		towards the River Yare and the Broads. Norfolk Rivers Trust surveys has confirmed a breeding population of white-clawed crayfish within 2KM upstream at Saxlingham Thorpe in the connected chalk-stream system. Downstream reaches, including the proposed cable corridor and any haul-road crossing, must be treated as potential crayfish habitat; desktop assumptions of absence are not acceptable. HDD beneath a chalk stream is high-risk in fissured and permeable chalk, and any crossing must demonstrate no deterioration in ecological, chemical, hydromorphological or biological status. This materially strengthens the case that there are plausible surface-water and groundwater pathways from the Scheme into sensitive downstream receptors, including European sites.	to be carried out for White Clawed Crayfish between July – September, in the Rule 6 letter [PD-005]. To provide some detail on impacts to white clawed crayfish, the Aquatic Habitat Assessment identified no records of white-clawed crayfish within the Order Limits and concluded that habitat suitability within the surveyed watercourses was low. The majority of watercourses crossed by the Scheme comprise ephemeral or modified ditch habitats characterised by fine sediments, limited flow diversity, restricted aquatic connectivity and a lack of suitable refuge features required by white-clawed crayfish. ES Volume 3: Appendix 8.9 – Aquatic Habitat Assessment [APP-160] Potential effects on hydrologically connected watercourses were considered on a precautionary basis. The Scheme incorporates extensive embedded mitigation to prevent pollution and sediment transfer to downstream aquatic habitats, including minimum 10 m stand-offs from

ID	Theme	Representation	Applicant's Response
			watercourses, pollution prevention and biosecurity measures secured through the Outline CEMP, and habitat reinstatement following construction. ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], Outline CEMP [APP-196]. In addition, the River Tas and Hempnall Beck has been identified as a sensitive aquatic receptor and is designated as an Avoidance Area. Crossings of the River Tas will be undertaken using trenchless techniques, with launch and reception pits located outside of the Avoidance Areas and cables installed at a minimum depth of 5 m below the surveyed riverbed. These measures substantially reduce the potential for direct disturbance and downstream impacts to aquatic habitats and species. Outline Cable Route Construction Statement [APP-216] The Applicant therefore remains satisfied that the low suitability of habitats within the Order Limits, together with the embedded

ID	Theme	Representation	Applicant's Response
			avoidance, pollution prevention and trenchless crossing measures secured through the Scheme design, provide a robust basis for concluding that significant effects on white-clawed crayfish are not anticipated. The Applicant will submit a Position Statement at procedural Deadline A in respect of White Clawed Crayfish.
BEPS-088	Habitats Regulations Assessment	The bat evidence creates a second, independent pathway of concern. The ES bat material records multiple barbastelle maternity colonies within 2 km of the Order Limits, including Brooke Wood, Shotesham-Woodton Hornbeam Woods SSSI, Tyrrells Wood SSSI and Saxlingham Grove, with colony roost zones and CSZ overlapping the entire Site. It also concludes that the Order Limits support a bat assemblage of national importance and that barbastelle were detected at every sampled location across the survey area. That is already enough to show that the Scheme lies within a functional landscape used by a highly sensitive Annex II species. In Site 3 Spring Wood is an irreplaceable woodland habitat immediately adjacent to the Order Limits, and BEPS' existing objection evidence records that the former WWII bunkers along the adjoining Hardwick Airfield edge were converted into bat hibernacula and are now used by multiple bat taxa, in addition to the barbastelles associated with Spring Wood.	No SACs are designed for bats within 34km of the Site, so the local barbastelle population not considered relevant in the HRA process. A full assessment of the likely effects to local barbastelle populations is found in is not considered in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] .

ID	Theme	Representation	Applicant's Response
BEPS-089	Habitats Regulations Assessment	Habitats Regulations screening is concerned not only with direct land-take from a European site, but with effects on the functional habitat that supports qualifying species populations. On the evidence now available, East Pye is not simply near European sites: it is embedded in the wider habitat system that supports their ecological function. In those circumstances, the Applicant cannot lawfully rely on simple separation distances or on the fact that particular designated sites are not themselves notified for bats. The correct question is whether there is a plausible pathway by which the Scheme, alone or in combination, may affect site integrity. Here there plainly is. For hydrology, the pathway arises through the chalk-stream and groundwater-connected landscape, including the River Tas system and associated watercourses. For bats, the pathway arises through the Scheme's location within overlapping barbastelle maternity, hibernation and commuting habitat.	The Applicant refers to its response to BEPS-088.
BEPS-090	Habitats Regulations Assessment	The position is made worse by the incompleteness of the evidence base. The Scoping Opinion required hydrological matters, WFD, private water supplies and designated-site effects to be addressed rather than scoped out. Yet the application materials and supporting objection record show repeated reliance on future work, habitat-led appraisal, outline management and generic mitigation rather than a completed, site-specific demonstration that likely significant effects can be excluded. That is not sufficient at HRA	Section 3 of the Shadow Habitat Regulations Assessment (sHRA) Report [AS-036] acknowledges the Scoping Opinion and Section 4 addresses the potential for hydrological pathways and designated site effects. The Applicant's stance on the process and justification of scoping out the ecological related matters is considered valid.

ID	Theme	Representation	Applicant's Response
		screening stage. Where uncertainty remains and a credible pathway exists, the precautionary principle applies. The inevitable conclusion is that likely significant effects on European sites cannot be excluded. The Applicant's screening approach is therefore unsound. A lawful Appropriate Assessment is required, and until that is undertaken on a complete and robust evidential basis, the Scheme's ecological acceptability has not been established.	
BEPS-091	Habitats Regulations Assessment	Habitats Regulations Assessment: failure to lawfully screen out likely significant effects The Applicant's Habitats Regulations Assessment screening is not robust and does not provide a lawful basis for concluding that the Scheme would have no likely significant effect on European sites, whether alone or in combination with other plans and projects. The starting point is the Applicant's own mapping. Figure 8.1 shows that the Order Limits lie within 10 km of multiple European sites, including The Broads SAC / Broadland SPA / Ramsar and Norfolk Valley Fens SAC. The map on page 1 shows the Scheme positioned within the wider designated landscape rather than isolated from it. The Shadow HRA also recognises a 10 km zone of influence for European sites and acknowledges that, where a European site includes mobile qualifying species, land	The Applicant refers to its response to BEPS-082.

ID	Theme	Representation	Applicant's Response
		outside the designated boundary may require consideration as functionally linked land. The Applicant nevertheless seeks to rely on a largely distance-based screening exercise. That approach is inconsistent with both the Scoping Opinion and the Applicant's own HRA methodology. The Planning Inspectorate expressly refused to scope out hydrological effects on Norfolk Valley Fens SAC, The Broads SAC and Broadland Ramsar because hydrological connectivity had not been established or ruled out, and required a WFD assessment or screening assessment, together with assessment of private water supplies where significant effects may occur. The Applicant's own Shadow HRA accepts that, if uncertainty remains at screening, the competent authority should proceed to Appropriate Assessment and that the precautionary principle applies. That is precisely the position here.	
BEPS-092	Habitats Regulations Assessment Water Environment	Hydrological connectivity is established, but its consequences are not assessed The Applicant's aquatic evidence shows that the Scheme affects a dense and connected water environment, not a single isolated receptor. The aquatic appendix identifies 21 waterbodies within or adjacent to the Order Limits and confirms that the assessment area includes connected reaches of Hempnall Beck, the River Tas system, Pulham Beck / Starston Brook and wider ditch networks. The	The Applicant refers to its response to BEPS-083 and BEPS-087. In addition, hydrological connectivity has been established within ES Volume 3: Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy report [AS-018].

ID	Theme	Representation	Applicant's Response
		chapter and appendix repeatedly rely on hydrologically connected downstream and off-site monitoring locations to infer likely fish and aquatic invertebrate assemblages within the Order Limits. The River Tas is a chalk-stream system of high sensitivity. The Scheme crosses or approaches Hempnall Beck and associated tributaries, while other parts of the Scheme and cable corridor affect the wider Waveney-linked ditch and brook systems. The aquatic appendix expressly identifies key construction risk pathways at crossing points, including sediment release, increased turbidity, accidental pollution from fuels or cementitious materials, temporary alteration of flow pathways or drainage function, and barrier effects or bank damage from access and working corridors. It also records that fish and dissolved oxygen/ phosphate are already failing quality elements in parts of the hydrologically connected Tas system downstream of Hempnall Beck, and states that any works must avoid deterioration in status under WFD 'one out, all out' principles. Despite this, the application does not provide a catchment-scale assessment capable of ruling out downstream effects. There is no downstream pollutant transport modelling, no integrated hydrogeological and hydrological analysis showing that impacts would not propagate through connected watercourses, no cumulative assessment of multiple inputs into the same catchment systems, and no robust demonstration that chalk-stream pathways to	The Scheme incorporates embedded flood risk and pollution management measures for all phases as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] for the protection of receptors that have hydrological connectivity with the Order Limits from potential flood risk/pollution impacts.

ID	Theme	Representation	Applicant's Response
		downstream receptors and European sites can be excluded. The Applicant uses connectivity when it helps establish receptor presence, but does not assess impact propagation through that same connectivity.	
BEPS-093	Habitats Regulations Assessment	The aquatic baseline is incomplete and precautionary screening is impossible on the present evidence The Applicant's aquatic appendix is not a full species assessment. It says expressly that it is a 'proportionate, habitat-led appraisal' and not a survey to confirm species presence. It also records that surveys were undertaken during unusually dry conditions, that many smaller drainage features were dry or partially dry at the time of survey, and that dry watercourses may still play an important ecological role during wetter periods, including providing seasonal connectivity and dispersal pathways. That limitation matters greatly at HRA screening stage. If the baseline is incomplete and dry conditions have suppressed the visibility of the very pathways by which effects may be transmitted, the competent authority cannot lawfully conclude that likely significant effects are excluded on the basis of objective information. The omission is especially acute for white-clawed crayfish. The Applicant states that there are no records within a 2 km search radius and that no field signs were observed during walkover inspection, but also accepts that absence	The Applicant refers to its response to BEPS-083 and BEPS-087.

ID	Theme	Representation	Applicant's Response
		of signs during a walkover does not confirm absence and that downstream habitats must in any event be safeguarded. Chapter 8 also acknowledges an Environment Agency white-clawed crayfish record approximately 6 km downstream on the River Tas and historic occurrence within the wider Tas catchment.	
BEPS-094	Habitats Regulations Assessment	More importantly, pre-application, BEPS supplied East Pye Solar with evidence from Norfolk Rivers Trust that a confirmed breeding population of white-clawed crayfish has been identified less than 2KM upstream within the chalk-stream system connected to the River Tas, and surveyed multiple times during the past five years. The custodian of this colony is registering as an interested party and making submissions on this matter. This materially alters the ecological baseline for East Pye Solar, that downstream reaches must be treated as potential crayfish habitat, and that desktop assumptions of absence are no longer acceptable. On any sensible view, this creates a clear basis for precautionary assessment rather than screening-out.	The Applicant refers to its response to BEPS-087.
BEPS-095	Habitats Regulations Assessment	The Applicant's no-LSE conclusion is undermined by its own evidence The ecology chapter claims negligible and non-significant effects on white-clawed crayfish and other aquatic receptors, largely by relying on low habitat suitability at surveyed crossing points and embedded controls. But that conclusion is not robust for three reasons.	The Applicant refers to its response to BEPS-083 and BEPS-087.

ID	Theme	Representation	Applicant's Response
		First, the surveyed reaches are only a subset of a wider connected catchment and were assessed in dry conditions. Second, the aquatic appendix did not undertake direct macroinvertebrate sampling and did not confirm species presence; it instead relied on habitat inference and out-dated connected-site records. Third, the very risk pathways identified by the Applicant—sediment, pollution, altered flows, drainage disruption and barrier effects—are exactly the pathways by which downstream effects on sensitive water-dependent habitats and species may arise. The same structural flaw appears in the HRA. The Applicant relies on uncertainty when describing the baseline, but on certainty when excluding likely significant effects. That is not a lawful application of the precautionary principle.	
BEPS-096	Habitats Regulations Assessment	In-combination effects are not ruled out The Shadow HRA recognises that the screening question is whether likely significant effects can be excluded, whether alone or in combination with other plans and projects. Yet the application does not provide a catchment-scale in-combination assessment of multiple crossings, multiple runoff pathways and multiple works affecting the same hydrological systems. This is particularly important in a receptor-dense landscape where the Order Limits and cable corridor affect numerous watercourses over a broad area, and where other major schemes are also coming forward in South Norfolk. In those circumstances, the	Crucially, and as set out in Shadow Habitat Regulations Assessment [AS-036] the protected Sites sit at a higher elevation than the Scheme, and/or sit within a different catchment such that impacts associated with hydrology (pollution, sedimentation, run-off) cannot occur, thereby negating the value of a catchment wide assessment. Furthermore, the Site is some distance from the European designated sites, with intervening land

ID	Theme	Representation	Applicant's Response
		absence of integrated in-combination hydrological assessment is itself a reason why no-LSE screening cannot safely be accepted.	used for a range of functions, including agriculture which has its own impacts on water quality within aquatic systems – for example higher nutrient loading, pollution, and sedimentation. Impacts to Broadland SPA qualifying species has been assessed within the SHRA as per Natural England's request. As there are no likely significant effects on the European Sites caused by the project then no in-combination affects are likely. Despite the results of the sHRA ruling out LSE alone and in-combination, embedded mitigation and actions undertaken as part of the Outline CEMP [APP-196] will mitigate habitats downstream of the designated areas and Site.
BEPS-097	Habitats Regulations Assessment	Conclusion The Applicant has not lawfully screened out likely significant effects on European sites. Its own evidence establishes a hydrologically connected landscape, identifies multiple risk pathways for sediment, pollution and	The Applicant refers to its response to BEPS-083 and BEPS-087.

ID	Theme	Representation	Applicant's Response
		altered flows, and acknowledges important limitations in the aquatic baseline, including dry-condition surveys and habitat-led appraisal rather than direct species confirmation. The confirmed upstream white-clawed crayfish evidence in the connected River Tas chalk-stream system further heightens the sensitivity of the receiving environment and reinforces the need for precautionary assessment. On the basis of objective information, likely significant effects cannot be excluded. The conclusion of no likely significant effect is therefore not robust or legally sustainable, and the competent authority should proceed to Appropriate Assessment rather than accept the Applicant's screening conclusion.	
BEPS-098	Habitats Regulations Assessment	Habitats Regulations Assessment: failure to assess barbastelle functional habitat and functionally linked land The Applicant has not lawfully screened out likely significant effects arising from the Scheme's impact on functionally linked habitat used by barbastelle bats. The Scheme is not proposed in an ordinary arable landscape of low bat sensitivity. The Applicant's own ecology evidence states that surrounding woodlands support barbastelle maternity colonies and that the entire Order Limits fall within the published 6 km Core Sustenance Zones of multiple known colonies, including Tyrells Wood, Little Wood, Brooke Wood, Spring Wood and Saxlingham Grove. It further states that the combined CSZs cover the whole	The Applicant refers to its response to BEPS-088

ID	Theme	Representation	Applicant's Response
		Order Limits and that the site is therefore likely to provide additional suitable roosting resources for this species. That matters because the HRA screening exercise cannot lawfully be confined to the boundaries of European sites alone. The Applicant's own Shadow HRA accepts that, where mobile qualifying species are concerned, land outside the designated boundary may need to be considered as functionally linked land. The question is whether likely significant effects can be excluded on the basis of objective information. On the Applicant's own evidence, they cannot.	
BEPS-099	Habitats Regulations Assessment	The Applicant's bat survey evidence confirms that barbastelle activity is widespread and significant across the Scheme area. The ES records that barbastelle were the third most abundant bat species and were recorded at every sampled location across the Order Limits, contributing to an overall bat assemblage of national importance. Site 3 is singled out in particular: the ES states that barbastelle were most frequently detected within their emergence times at "Site 3 adjacent to Spring Wood, Hempnall CWS", which it identifies as a known barbastelle roost site and foraging area. It adds that features likely to be trees within or adjacent to these locations may provide additional roosts supporting the main maternity populations. The proximity of known maternity habitat is not speculative. The bat appendix records a Norfolk Barbastelle Study	The Applicant agrees with the notable importance of the local barbastelle populations and landscaping and scheme design has taken this into consideration, providing increased field boundary margins and a significantly increased hedgerow linear network for connectivity to wider habitats. Further information is found in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] as well as ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157]. The Applicant would refer the reader to the response BEPS-088 for potential impacts in a HRA context.

ID	Theme	Representation	Applicant's Response
		Group maternity colony at Spring Wood with a CRZ overlapping the Site. The same appendix explains that intensively tracked maternity colonies typically forage within average home ranges of 3.5 km and do not travel beyond 5.5 km, confirming the importance of nearby agricultural mosaics and linear features to colony support. In addition, the scoping report identifies Spring Wood as lying immediately adjacent to Site 3 between Sub-Sites 3A and 3B, and describes it as ancient replanted woodland and a priority deciduous woodland habitat. The covering report similarly confirms that Spring Wood lies between the two Site 3 sub-sites.	
BEPS-100	Habitats Regulations Assessment	The objection is stronger still because there is evidence of a hibernation resource on the same edge. BEPS' existing objection record states that the former bomb shelters of the WWII Hardwick Airbase bordering Sites 3A and 3B were converted by their owners into bat hibernacula and are now home to a wide range of bat taxa, in addition to the barbastelle colonies roosting in Spring Wood. That means Site 3 appears to sit beside a combined maternity, hibernation and commuting landscape. The relevant impact pathway is therefore not limited to abstract 'foraging habitat loss'. It includes the risk of disturbing a functional roost network and the routes connecting it. The Applicant has not provided a lawful basis for screening that risk out. The same chapter that recognises national bat importance and site-wide barbastelle presence also concedes that some hedgerow and field-boundary habitat	Site 3B has since been removed from the Order Limits leaving just Site 3 (formerly Site 3A). There is a significant stand-off buffer to Spring wood from Solar PV and an increase in field boundary habitat compared to previous agricultural land. Additional retained cereal crops have been included to the north west of Spring Wood to aid Skylark Mitigation. A single <10m section of woodland is to be removed for construction (before reinstatement) at the north western end of Site 3 at the southern end of CRC6 (see H43) and notable hedgerow planting is to be included

ID	Theme	Representation	Applicant's Response
		loss will be necessary for access, haul routes and cable-route works. It says those losses are minor and not large enough to dissuade bat usage, but this is asserted rather than demonstrated. There is no mapped assessment of key barbastelle flight corridors for Site 3, no hibernacula-specific assessment, no evidence-led modelling of how bats move between Spring Wood, adjoining linear features and the Hardwick edge, and no HRA analysis of the consequences of fragmenting or industrialising that functional habitat. Generic retention of "the large majority" of hedgerows is not enough where the known legal issue is whether likely significant effects on functionally linked habitat can be excluded.	within Site 3 to increase connectivity. See Outline LEMP [APP-199] (see also Appendix A Hedgerow Removal Plan and Figure 2 Green Infrastructure Strategy [AS-005]) and ES Volume 1: Chapter 8 – Ecology and Biodiversity [APP-044] .
BEPS-101	Habitats Regulations Assessment	Nor can the Applicant rely on generic habitat buffers and outline mitigation to cure the problem at screening stage. Norfolk Wildlife Trust's consultation response is telling. It says Site 3 surrounds Spring Wood CWS and adjacent deciduous woodland; that the site had previously been recommended for removal from the selection because of likely impacts on the CWS; that even with revised layout there remained concern about works in this area, especially a substation in the field immediately west of the ancient woodland; and that wider buffers and ecotones may be required. That response directly undermines any claim that the effects on Spring Wood and its supporting habitat are obviously non-significant.	The substation and battery energy storage site is located adjacent to Site 1B in the south-west corner of the development approximately 7km from Spring Wood. The development of Site 3 includes solar array, retained arable farmland for skylark mitigation and green infrastructure including stand-off buffers from ancient woodland, planted scrub, the creation of species-diverse grassland and hedgerow planting. Further information is found in ES - Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] as well as ES

ID	Theme	Representation	Applicant's Response
			Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157], Outline LEMP [APP-199] (see also Appendix A Hedgerow Removal Plan and Figure 2 in the Green Infrastructure Strategy [AS-005]).
BEPS-102	Habitats Regulations Assessment	The cumulative effect of the Applicant's own evidence is therefore clear. Spring Wood is immediately adjacent to Site 3 and supports a known barbastelle maternity colony. The whole Order Limits fall within overlapping barbastelle CSZs. Barbastelle activity is recorded across the entire Scheme and is of national importance. Site 3 itself is identified by the Applicant as adjacent to a known barbastelle roost site and foraging area. There is additional evidence of bat hibernacula along the same boundary. In those circumstances, Site 3 plainly forms part of the functional habitat used by a highly sensitive Annex II species. The Applicant has not provided objective information capable of excluding likely significant effects on that functionally linked habitat, whether alone or in combination with other plans and projects. Accordingly, the HRA screening conclusion is not robust or lawful. The risk to barbastelle functional habitat, including maternity, hibernation and commuting resources cannot be screened out. A more rigorous assessment is required.	The Applicant refers to its response to BEPS-088.

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BEPS-103	ES Chapter 1: Introduction	Chapter 1 – Introduction BEPS objects to Chapter 1 of the Environmental Statement because it is not a neutral introductory chapter. It performs an important framing role for the whole ES, yet it presents contested propositions about consultation adequacy, PEIR sufficiency and the significance of later design changes as though they were established facts. In doing so it mischaracterises the procedural history of the project, understates the extent of dispute and uncertainty surrounding the environmental information, and tends to predispose the reader in favour of the Applicant's narrative before the substantive chapters are reached. Chapter 1 is therefore objectionable in its own right and also reduces confidence in the reliability of the ES as a whole.	The Applicant refers to its response to BEPS-104 to BEPS-109.
BEPS-104	ES Chapter 1: Introduction	Chapter 1 states that consultation alongside the EIA process is 'critical to the development of a comprehensive and proportionate ES' and that the PEIR was prepared so consultation bodies could develop an informed view of the likely significant effects of the Scheme. It further presents the consultation process as having successfully engaged the relevant parties and informed the evolution of the project. Those are not merely descriptive statements. They are substantive claims as to legal and procedural adequacy, and they are plainly disputed on the evidence. The wider project record contains extensive and sustained objections that the PEIR did not provide sufficient information on ecology, cumulative effects, water, heritage, BESS fire and pollution risk, human health and other major	ES Volume 1, Chapter 1 – Introduction [APP-037] provides a short summary of the consultation process. As stated within Chapter 1, the Consultation Report [APP-024] has been produced which provides a more detailed summary of the non-statutory consultation methodology and extent of engagement and participation over the consultation period. An overview of the issues raised in feedback submitted during consultation, as well as the Applicant's

ID	Theme	Representation	Applicant's Response
		matters, and therefore did not enable meaningful consultation. Chapter 1 should not present that issue as settled.	response to this feedback is also detailed. The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant considers the materials provided were adequate and informative, and presented information using standard mapping conventions.
BEPS-105	ES Chapter 1: Introduction	A particularly serious defect is Chapter 1's treatment of the targeted consultation. The chapter states that the later changes were 'localised' and 'minor in their nature' and that they did not give rise to any materially new or different likely significant environmental effects compared to those reported in the PEIR. That is a highly consequential procedural and environmental conclusion. Yet Chapter 1 provides no substantive analysis to justify it. It is simply asserted. Given the known changes relating to the National Grid substation position, Site 1, the enlarged 400kV infrastructure, Site 7D, AIL routes, revised construction traffic routes and associated implications for landscape,	ES Volume 1, Chapter 1 – Introduction [APP-037] provides a short summary of the targeted consultation process. As stated within Chapter 1, the Consultation Report has been produced which provides a more detailed summary of the targeted consultation process. As part of this consultation, the Applicant published on its website a Targeted Consultation Information Change Note to provide details of the consultation, present

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		heritage, transport, aviation and nearby communities, that conclusion cannot safely be treated as uncontroversial. This is all the more important because the Scoping Opinion made clear that the ES must contain proper detail on alternatives, justification of professional judgment, mitigation and design assumptions, and that matters not agreed to be scoped out must be properly assessed. The introductory chapter's attempt to dispose of later changes as environmentally immaterial by assertion alone is therefore unsatisfactory. It tends to pre-empt scrutiny rather than assist it.	each specific change to the development boundary, and confirm that the changes did not lead to any changes to the environment effects reports in the PEIR. This included a description of every proposed change and the total area of the change. The additional areas and associated activities including their nature, extent, and duration had been reviewed as part of the environmental assessment. The additional areas did not change the likely significant effects of the environmental impact assessment that were set out in the PEIR (the findings from which the Applicant sought views on for the Phase Two (statutory) consultation). ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] provides a description of the reasonable alternatives considered for the Scheme, and a summary of the design evolution. Assessment assumptions and limitations, and mitigation measures relied upon for assessments are

ID	Theme	Representation	Applicant's Response
			provided within each topic chapter [APP-042 to APP-056]. The topic chapters [APP-042 to APP-056] set out the relevant Scoping Opinion comments received from statutory consultees, including how each comment has been addressed in the ES chapter and where the response is located within the chapter.
BEPS-106	ES Chapter 1: Introduction	Chapter 1 also fails to provide a fair opening account of the principal cross-cutting constraints and controversies affecting the Scheme. It describes the Scheme, the Order Limits and the 60-year operational life, but it does not candidly identify at the outset the central disputes that bear on the planning balance and on the reliability of the ES: the contested need case, the dispersed and fragmented nature of the project, the cumulative burden with other schemes, and the repeated criticisms of the adequacy of the consultation-stage environmental information. Instead, the chapter normalises the project before the reader reaches the detailed objections. That is not an acceptable way to frame a deeply contested NSIP application.	ES Volume 1, Chapter 1 – Introduction [APP-037] is not intended to describe objections to the Scheme. The Consultation Report [APP-024] and its Appendices [APP-025 to APP-034] provide a detailed account of how consultation feedback, including prescribed consultees and public comments, has been considered and, where appropriate, how they have influenced the evolution of the Scheme. The Potential Main Issues for Examination [APP-211] (PMIE) document provides a summary of the main residual issues with key

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			stakeholders remaining at the time of the DCO Application's submission.
BEPS-107	ES Chapter 1: Introduction	The chapter is further weakened by its presentation of compliance by cross-reference. Table 1.3 maps Schedule 4 requirements to other parts of the ES, but a table of references is not the same as substantive compliance. In an application where multiple topics were expressly identified at scoping as requiring fuller treatment, and where the adequacy of the PEIR was itself disputed, Chapter 1 gives an impression of completeness that is not justified merely because topics are listed in a compliance table. Appendix 1.2 does not cure these defects. It is a short and formulaic statement of expertise prepared to satisfy Regulation 14(4). It does not establish that the disputed judgments in the ES are robust. It is notable that the EIA Project Manager is said to have over 3 years' experience in environmental planning and EIA coordination; that the Chapter 17 EMF lead is said to have 3 years' experience; and that major accidents and disasters and telecommunications, utilities and television in Chapter 18 were prepared by "EIA Coordinators" rather than separately identified specialist leads. The point is not that those individuals are unqualified in a broad sense. The point is that Appendix 1.2 provides only limited and generic assurance in relation to technically sensitive and	The Applicant considers that the requirements of Schedule 4 of the EIA Regulations have been addressed within the ES. Table 1.3 signposts to the relevant documents where each of the requirements are met. The ES [APP-036 to APP-195] and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112].

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		controversial topics within this NSIP. It does not answer the substantive criticisms of the ES.	
BEPS-108	ES Chapter 1: Introduction	For those reasons, BEPS submits that Chapter 1 should be given limited weight. The Examining Authority should not accept at face value the chapter's characterisation of consultation adequacy, PEIR sufficiency or the non-materiality of the targeted consultation changes. Those matters should instead be tested carefully against the underlying evidence across the application documents, statutory consultee responses and Interested Party representations. The defects in Chapter 1 are not merely editorial. They go directly to the transparency, fairness and reliability of the ES as the foundation document for this application.	The Applicant does not consider that ES Volume 1, Chapter 1 – Introduction [APP-037] impairs the transparency, fairness, or reliability of the ES.
BEPS-109	ES Chapter 1: Introduction	Relief sought The Examining Authority is requested to treat Chapter 1 with caution, to give it reduced weight where it advances conclusions on consultation adequacy and environmental immateriality, and to require the Applicant to justify those assertions by reference to the underlying evidence rather than introductory narrative. The Examining Authority is further requested to assess the remainder of the ES on its own merits without being influenced by the introductory chapter's one-sided presentation of the procedural history and adequacy of the environmental information.	The Applicant does not consider that ES Volume 1, Chapter 1 – Introduction [APP-037] should be given reduced weight.

ID	Theme	Representation	Applicant's Response
BEPS-110	EIA Methodology	Chapter 2 – EIA Methodology, Embedded Controls, Deferral and Cross-Cutting Adequacy Introduction This representation objects to the adequacy of the Environmental Statement's methodology and to the extent to which the applicant seeks to rely on outline control documents, generic matrices, post-consent management plans and broad design flexibility in place of a sufficiently fixed, transparent and evidence-led assessment. Chapter 2 matters are not procedural in a narrow sense. In a project of this scale, duration and dispersion, methodological choices determine what has been assessed, how significance has been judged, what has been omitted, and whether the Secretary of State is being given a reliable basis for decision-making at all. The applicant's own policy appendix confirms that each ES chapter is said to be prepared against a defined legislative and policy framework, but that appendix is only a schedule of standards, not proof that those standards have been met in substance.	The Applicant considers the EIA Methodology set out within ES Volume 1, Chapter 2 – EIA Methodology [APP-038] to be adequate, providing a reliable basis for decision-making. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205]. Detailed management plans, which will be substantially in accordance with these outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032]. The approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032]. The Design Principles, Parameters and Commitments [APP-213] set out the maximum and, where necessary, minimum parameters with the spatial extents shown on the Works Plan [AS-002 and AS-003]. The Scheme has Work Nos as described in Schedule 1 of the Draft DCO and does

ID	Theme	Representation	Applicant's Response
			not have a detailed design at this stage. The Applicant is seeking flexibility in design parameters to allow for technological advancement to maximise energy production. For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and allow for a decision on the technology choice to be made at the point of procurement. The Planning Inspectorate's Advice Note Nine: Rochdale Envelope acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme to be considered. The Policy Compliance Document [APP-210] demonstrates the Scheme's

ID	Theme	Representation	Applicant's Response
			compliance with the relevant NPSs and other important and relevant policy.
BEPS-111	EIA Methodology	The objection is therefore cross-cutting. It applies not only to Chapter 2 in isolation, but to the way Chapter 2, APP/7.18, APP/7.1, APP/7.2 and the policy appendix together structure the entire ES. The central concern is that the application repeatedly presents outline frameworks and future approvals as if they were equivalent to an assessed and secured scheme, when in reality many essential environmental controls, operational assumptions and construction details remain contingent, flexible or deferred. APP/7.18 is relied on as the design parameter and commitment document forming part of the Rochdale-envelope basis for the EIA, including maximum panel heights, BESS parameters, substation heights, pylon heights, cable corridor dimensions and watercourse-crossing assumptions. APP/7.1 and APP/7.2 are both expressly outline documents, with later detailed plans to follow after consent.	The Applicant refers to its response to BEPS-110.
BEPS-112	EIA Methodology	Chapter 2 is excessively generic and does not provide a sufficiently scheme-specific methodology The primary defect is that the methodology chapter appears to do too little of the work that a methodology chapter should do. Instead of establishing a coherent, scheme-wide, topic-integrated methodology for a highly dispersed 60-year scheme, it relies on generic propositions about baseline, significance, mitigation and residual	ES Volume 1, Chapter 2 – EIA Methodology [APP-038] provides an overview of the EIA process and general methodology. Chapter 2 sets out the assessment approach for the ES, including the topic chapter structure and content, Rochdale Envelope approach, spatial and

ID	Theme	Representation	Applicant's Response
		effects, while leaving the substantive methodological choices to individual topic chapters and future control documents. That is inadequate for a project where environmental effects arise through interrelationship: water, ecology, heritage setting, noise, landscape, aviation, soils and rights of way are not compartmentalised topics here, but overlapping pathways of effect.	temporal scopes, determining baseline conditions, mitigation, effect significance criteria, cumulative and in-combination effects, and consideration of alternatives. Each of the topic chapters of the ES [APP-042 to APP-056] provide an explanation of methods used in undertaking the technical study with reference to published standards, guidelines, and best practice, the application of significance criteria is outlined. The topic chapters also outline any difficulties encountered in compiling the required information, and the assumptions and limitations associated with the assessment. In accordance with established EIA practice, Chapter 2 provides the overarching methodology for the ES, and the topic chapters provide the technical assessment methodology which consider topic-specific guidance and standards. Regarding the interrelationships between environmental effects, ES Volume 1, Chapter 19 – In-

ID	Theme	Representation	Applicant's Response
			Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects from other environmental topics. Section 19.2 details the methodology utilised for the in-combination effects assessment.
BEPS-113	EIA Methodology	The applicant's own legislation and policy appendix demonstrates the breadth and specificity of the standards said to apply across chapters. It identifies detailed national policy requirements on climate resilience, greenhouse gas assessment, landscape and visual assessment, biodiversity, water quality and resources, heritage significance and setting, soils, contamination and waste. The methodological burden on Chapter 2 was therefore to explain clearly how those topic-specific standards are to be consistently applied across the ES, especially where receptors and pathways overlap. Instead, the structure of the application suggests that Chapter 2 functions largely as a generic portal to later chapters rather than as a controlling methodological framework. That matters because a methodology chapter is where the applicant should explain how uncertainty, interrelationships, flexibility and cumulative burden have been handled at a scheme-wide level. Where that is not done, the Secretary of State is left to infer consistency across multiple chapters, outline plans and parameter	In accordance with established EIA practice, ES Volume 1, Chapter 2 – EIA Methodology [APP-038] provides the overarching methodology for the ES, and the topic chapters provide the technical assessment methodology which considers topic-specific guidance and standards. Paragraph 2.3.2 of Chapter 2 outlines the relevant guidance that the ES has been prepared in accordance with. The topic chapters also include an overview of relevant legislation, planning policy, and other guidance documents applicable to each assessment, with further details provided within ES Volume 3, Appendix 2.3 Legislation, Planning Policy and Guidance [APP-115]. The Planning Statement [APP-209] and Policy Compliance

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		documents. That is not a safe basis for a lawful or robust EIA.	Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies. ES Volume 1, Chapter 2 – EIA Methodology [APP-038] sets out the Rochdale Envelope approach, adopted at a Scheme-wide level to maintain flexibility in the design and layout of the Scheme and to address uncertainties as identified in the ES. ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics. Section 19.2 details the methodology utilised for the in-combination effects assessment. ES Volume 1, Chapter 2 – EIA Methodology [APP-038] sets out the approach to the assessment of cumulative effects. ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116] details the methodology for identifying the cumulative schemes.
BEPS-114	EIA Methodology	Excessive reliance on outline control documents and post-consent approvals	Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-

ID	Theme	Representation	Applicant's Response
		A central objection is that the applicant relies on outline management plans and future approvals to fill gaps that should already have been resolved at application stage. APP/7.1 is explicitly an outline Construction Environmental Management Plan and states that the detailed CEMP will only be produced after consent and before construction. It also states that multiple detailed CEMPs may later be prepared for different works. APP/7.2 adopts the same structure for operation, stating that the detailed OEMP will be prepared after consent and before operation, and that multiple detailed OEMPs may be prepared for specific works. This is not a minor drafting point. It goes to the heart of whether the significant effects of the proposed development have actually been assessed. If the detailed means by which impacts are to be avoided, controlled or mitigated are left to future plans, then much of the ES becomes conditional on information not yet available to the examination. In that situation, the outline plans do not demonstrate that impacts are resolved. They demonstrate the extent of unresolved matters. The same problem is apparent across multiple disciplines. APP/7.1 defers key matters to future detailed CEMP(s), contractor RAMS, a Water Management Plan, a detailed drainage strategy, ground investigation, foundation works risk assessment, hydrogeological risk assessment where required, a dust management plan, noise monitoring schemes, Section 61 consents, protected species surveys	205]. Detailed management plans, which will be substantially in accordance with these outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032]. The approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032]. Paragraph 2(4) of Schedule 15 to the Draft DCO [AS-032] requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that any mitigation measures identified in the Environmental Statement are contained in the final plans or an explanation is provided as to why there is a change (for example, if a mitigation measure is no longer required as technology has advanced and the

ID	Theme	Representation	Applicant's Response
		and licensing, emergency response planning and final crossing schedules. APP/7.2 likewise depends on later detailed OEMP(s), LEMP, SRMP, OTMP, PRoWPPMP, BSMP, SWMP and other detailed plans. The relevant representation point is straightforward: the application repeatedly substitutes future management frameworks for present assessment certainty. That is particularly objectionable where those future plans are relied upon to make acceptable a scheme that would otherwise present significant or uncertain adverse effects.	impact will no longer occur). A failure to do so would be a criminal offence and there are enforcement mechanisms that would ensure such mitigation would be implemented. These management plans are secured via the Requirements contained within Schedule 2 of the Draft DCO [AS-032].
BEPS-115	EIA Methodology	Rochdale-envelope flexibility has not been adequately constrained APP/7.18 is one of the most important documents in the application because it sets the design principles, parameters and commitments against which the ES is supposedly assessed. It includes, among other things, tracker solar panels up to 4.5m at greatest inclination and fixed panels up to 3.5m; a BESS up to 6.5ha with containers up to 3.5m high; project substations up to 13m; a National Grid substation up to 15m; up to four new pylons up to 61m; cable trench widths up to 7m and trenchless bores up to 12m depth; HDD pits up to 25m by 25m and 6m high; and internal access and security infrastructure parameters.	The Design Principles, Parameters and Commitments [APP-213] set out the maximum and, where necessary, minimum parameters with the spatial extents shown on the Works Plan [AS-002 and AS-003]. The Scheme has Work Nos as described in Schedule 1 of the Draft DCO and does not have a detailed design at this stage. Advice Note Nine 'Rochdale Envelope' was published by PINS in July 2018 to address the degree of flexibility that would be considered appropriate to deal with uncertainties associated with applications for development consent. As detailed within ES Volume 1,

ID	Theme	Representation	Applicant's Response
		Where a project is assessed on a parameter basis, the methodology must show that topic chapters have genuinely assessed the worst case generated by those parameters. That is not established merely by listing maximum dimensions. It requires consistent translation of those maxima into visual, hydrological, ecological, noise, heritage, aviation and construction assessments. The concern here is that APP/7.18 is being used partly as a fixing document and partly as a flexible envelope, without a sufficiently transparent explanation of how the outer envelope has been carried through each topic chapter. That concern is sharpened by the applicant's reliance on outline management documents and later approvals. A parameter-based ES can only be robust if the envelope is tightly controlled and the worst-case assumptions are clearly identified. Where later detailed design retains significant discretion, the risk is that the application achieves apparent certainty in one place while preserving practical flexibility in another.	Chapter 2 – EIA Methodology [APP-038], the ES adopts the Rochdale Envelope approach to maintain flexibility in the design and layout of the Scheme in the DCO Application, to address uncertainties as identified in the ES, and to allow for advancements in technology from now to the time of construction. All technical chapters determine and assess the maximum parameters where flexibility needs to be retained as under the Rochdale Envelope Approach. ES Volume 1, Chapter 4 – The Scheme [APP-040] details the Scheme parameters considered by the technical authors as part of the EIA to assess realistic worst-case effects for each potential receptor. Topic chapters detail assumptions and limitations where relevant. For example, ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] notes only assess the parameters of Option A: Single-Axis Tracker Panels, to reflect a worst-case assessment in relation to landscape and visual effects.

ID	Theme	Representation	Applicant's Response
			The Applicant refers to its response to BEPS-114 relating to the mitigations secured through outline management plans.
BEPS-116	EIA Methodology	Construction effects remain materially unresolved APP/7.1 reveals that key construction assumptions remain unsettled. The document provides only an outline framework. It anticipates construction from 2028 for about 24 months with energisation in 2031, but much of the actual construction methodology remains to be finalised later. This includes not only general working methods, but matters central to impact assessment. Most notably, cable route construction methodology remains materially unfixed. APP/7.1 states that the start and end points of open-cut and trenchless methods will be confirmed only at detailed design stage, and that the final crossing schedule will be provided later. That is a substantial gap because the significance of effects on watercourses, hydrology, ecology, archaeology, soils and traffic can differ radically depending on whether a crossing is open cut, trenchless, ramped, culverted or otherwise engineered. The application also does not commit to an unequivocal no-crossing/no-in-channel position. Although avoidance areas for trenchless crossings are listed, APP/7.1 still allows temporary construction access ramps over	As part of the assessment, appropriate mitigation measures have been developed and are incorporated into the Scheme and are secured in the Outline CEMP [APP-196]. The outline management plans establish a framework for the details to be secured through the DCO Requirements. The qualifying phrases are considered appropriate by the Applicant at this stage given the outline nature of the management plans, the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. For example, the Applicant has sought to retain flexibility around cable routing, vehicular access points and highway visibility requirements, public access to PRow, vegetation retention and removal to reflect the details that will be subject to the detailed design stage.

ID	Theme	Representation	Applicant's Response
		watercourses where haul routes cannot avoid them, including ramp types that may involve in-stream supports or culvert arrangements. This is particularly serious for water environment, chalk stream, WFD, pollution and ecological receptors. A methodology that treats watercourse effects as controlled while preserving such flexibility is not sufficiently robust. The document also repeatedly uses flexible language such as “where practicable,” which weakens the apparent force of mitigation throughout. Mitigation stated in discretionary terms does not provide the same certainty as fixed mitigation. That matters because the ES often depends on “embedded mitigation” to reach lower significance judgments.	Vegetation removal/pruning and reinstatement will also depend on seasonal considerations, for example. The Applicant has also sought to retain flexibility where the timing of implementing measures will be subject to agreeing details with the relevant planning authority, for example, in relation to the timing for any repairs required as a result of the Scheme in relation to Public Rights of Way and construction haul routes. Further to the above, the specificity will be provided in the detailed management plans, which will be substantially in accordance with these outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032]. The approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032]. Paragraph 2(4) of Schedule 15 to the Draft DCO [AS-032] requires the Applicant to confirm when submitting

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			the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that any mitigation measures identified in the ES are contained in the final plans or an explanation is provided as to why there is a change (for example, if a mitigation measure is no longer required as technology has advanced and the impact will no longer occur).
BEPS-117	EIA Methodology	Operational effects are understated and too much is deferred over a 60-year scheme life APP/7.2 demonstrates that the operational case is not one of low-intensity maintenance alone. It assumes operation from 2031 for up to 60 years, with decommissioning in 2091. It also assumes all solar panels will be replaced once after 40 years taking up to 24 months, that the BESS may be replaced up to five times, and that transformers may be replaced once after 30 years. Those are not trivial lifecycle matters. They amount to repeated intrusive replacement cycles during the operational life of the scheme. The document acknowledges that replacement activities would be similar to construction and that construction	ES Volume 1, Chapter 4 – The Scheme [APP-040] Section 4.5 provides details on the operation and maintenance phase of the Scheme, including the two scenarios which have been considered within the ES: general operational maintenance activities and the programme of replacement activities. ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164] assesses the water demand for the Operation and Maintenance Phase. A potable and non-potable water supply demand balance can be reached with

ID	Theme	Representation	Applicant's Response
		mitigation will be reintroduced where relevant. This strongly suggests that the operational phase includes embedded repowering-style events with construction-like effects on traffic, dust, access, noise, ecology and local communities. Yet such mid-life replacement burden is easily understated where the scheme is described as simply "operational." Operational water dependency also remains unresolved. APP/7.2 states that water supply for operational staff facilities is assumed to be by tanker and stored on site, with wastewater removed by tanker. It also assumes a worst-case annual panel cleaning cycle using water only, preferably deionised. This is relevant not only to water resources and deliverability, but also to climate resilience and operational practicality in a water-stressed region. Many operational controls are likewise deferred. The document relies heavily on future detailed OEMP(s), LEMP, sensitive lighting strategy, noise controls, waste plans and other operational management documents. The effect is that the long-term operational acceptability of the scheme rests on future management performance rather than on a presently fixed and assessed operational design.	embedded mitigation. Water neutrality options have been given priority to reduce the supply requirements. These options include rainwater harvesting, on-site water storage and water tankering (to meet peak demand). Tankering is the preferred method of supply. The Applicant will continue conversations with local tankering suppliers to confirm that they are able to supply the water to reach peak demand. Note the Applicant's response to AGW-012 to Anglian Water Services in relation to its Relevant Representation [RR-0114] in 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 [EN0110014/EXAM/8.7]. The Outline OEMP [APP-197] sets out the environmental principles to be followed during the operation of the Scheme. See response to BEPS-116 regarding the use of management plans to secure controls.

ID	Theme	Representation	Applicant's Response
BEPS-118	EIA Methodology	Spatial baseline and receptor sensitivity are understated APP/2.9 and APP/2.10 are particularly important because they show that the Order Limits sit within a wider ecological network, not in isolated low-value fields. APP/2.9 maps County Wildlife Sites, Roadside Nature Reserves and numerous Priority Habitat Inventory features around the Order Limits, including broadleaved woodland, grazing marsh, lowland meadow, fen, ponds, reedbeds and orchard-related habitat. APP/2.10 similarly shows the relationship of the scheme to statutory designations and ancient woodland, including SAC, SPA, Ramsar, SSSI and other sensitive ecological receptors. These documents are critical because they undermine any simplistic characterisation of the baseline as mainly arable land of limited sensitivity. They show instead a connected and environmentally sensitive receiving environment, with ecological function, hydrological interrelationship and statutory/non-statutory networks extending across and beyond the Order Limits. That has implications far beyond ecology. It affects water environment, climate resilience, lighting, landscape, cumulative effects and the methodology for receptor sensitivity itself. A scheme-wide methodology that does not fully reflect the connected ecological and hydrological setting risks understating fragmentation, edge effects, lighting spill, pollution pathways, flood interactions and cumulative burden.	The Applicant agrees that the Non-Statutory Sites or Features of Nature Conservation Plan [APP-013] and Statutory Sites or Features of Nature Conservation Plan [APP-014] are important and show the relationship of the Scheme to sites or features of nature conservation. A description of the Order Limits is provided within ES Volume 1, Chapter 3 – The Order Limits [APP-039], including a description of the nearest designated sites. A full description of the ecology baseline, derived from desk study and field survey data, is provided within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. This is further supported by further detailed baseline information within the survey reports [APP-152-APP-160] and ES Figures 8.1- 8.6 [APP-086-APP-091].

ID	Theme	Representation	Applicant's Response
BEPS-119	EIA Methodology	Generic significance matrices and professional judgment are not sufficiently transparent A recurring methodological concern is the extent to which broad significance matrices and generalised professional judgment appear to be doing the real work of significance evaluation. The policy appendix shows that multiple highly specific policy tests apply across topics: refusal where significant biodiversity harm cannot be avoided, mitigated or compensated; careful flood risk and water resource assessment; heritage significance and setting methodology; minimisation of impacts on BMV land and soils; and detailed greenhouse gas and resilience standards. Where topic-specific legal and policy standards are this exacting, generic significance tables are insufficient unless accompanied by a very clear explanation of how they are adapted to the actual receptors and effect pathways of this scheme. That is especially so for sensitive receptors such as bats and dark corridors, ancient woodland, heritage settings, chalk-stream-linked systems, private water supplies, rights of way and rural tranquillity. The concern is not that professional judgment is impermissible. It is that it must be transparent, controlled and traceable. Here, the application's structure leaves too much room for significance judgments to be shaped by broad matrices, outline mitigation and optimistic	The ES [APP-036 to APP-195] and environmental and ecological surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112]. ES Volume 1, Chapter 2 – EIA Methodology [APP-038] provides an overview of the EIA process and general methodology, including an explanation of the effect significance criteria. This includes the methodology for assessing receptor sensitivity, magnitude of impact, the effect significance matrix, and significance of effect definitions. Each topic chapter of the ES [APP-042 to APP-056] details the sensitivity and magnitude of impact, based on quantitative data, where possible, and accepted criteria specific to their topic, together with the use of value judgment and expert interpretation to

ID	Theme	Representation	Applicant's Response
		management assumptions rather than by clearly evidenced worst-case analysis.	establish to what extent an effect is environmentally significant. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.
BEPS-120	EIA Methodology	Cumulative and interrelationship methodology is not robust enough This scheme is exceptionally dependent on cumulative and interrelationship assessment. That is because its effects are not generated by one concentrated site, but by dispersed field parcels, cable corridors, substations, BESS, overhead line works, access changes and long-term operational replacement. Methodology must therefore grapple with cumulative burden both within the scheme and with other schemes. The policy appendix records the relevant policy and guidance context across landscape, ecology, water, transport, climate and heritage, including cumulative assessment expectations. Yet the structure of the outline plans and parameter documents suggests a persistent tendency to break effects into topic-specific or work-specific units and then rely on later management controls. That approach risks missing the true cumulative picture: repeated disturbance, multiple crossings, landscape industrialisation, habitat fragmentation, recurring	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics. This assesses the inter-relationship between individual development effects on the same receptor.

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		replacement traffic, lighting nodes, noise sources and long-term maintenance dependencies. The issue is especially acute where the scheme depends on future landscape mitigation, later drainage design, later ecological management and future operational plans. In such circumstances, cumulative outcomes are not simply the sum of assessed fixed effects. They are also the product of uncertainty, maintenance burden and the risk that multiple mitigations may underperform together.	ES Volume 1, Chapter 2 – EIA Methodology [APP-038] sets out the approach to the assessment of cumulative effects, which refers to the combined effects of other development schemes which may interact cumulatively with the Scheme. ES Volume 3, Appendix 2.4 Cumulative Schemes [APP-116] identifies the cumulative schemes. The technical assessments within the ES [APP-042 to APP-056] provide an assessment of potential cumulative effects
BEPS-121	EIA Methodology	Water environment methodology is particularly vulnerable The water environment is one of the clearest examples of why Chapter 2 methodology matters. The policy appendix shows that the applicant accepts the relevance of flood risk, WFD, sustainable drainage, water quality, water stress, Anglian Water planning documents, CAMS, rainwater harvesting guidance and Norfolk LLFA drainage guidance. APP/7.1 and APP/7.2 then show that construction and operation both depend heavily on later drainage design, maintenance, pollution controls, membranes, penstocks, tankering and future management plans. Appendix A to APP/7.2 is revealing in this regard. It sets out a recurring long-term drainage maintenance regime for	The Scheme has Work Nos. and does not have a detailed design at this stage for the BESS and Substation areas. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within the Outline CEMP [APP-196]. This will ensure surface water flood risk will be managed at the BESS, National Grid Substation and Customer Substation during temporary and permanent phases.

ID	Theme	Representation	Applicant's Response
		manholes, flow controls, penstocks, permeable surfaces, filter drains and swales, including quarterly penstock inspection, bi-annual silt checks for manholes and flow controls, brushing and vacuuming of permeable surfaces three times a year, monthly inspection of swales and other recurrent monitoring obligations. On the tables shown on pages 3 to 6 of Appendix A, the scheme's drainage performance is plainly dependent on active, repeated maintenance rather than on passive inherent resilience. That matters because the methodology of the water assessment must account not merely for ideal-design performance, but for the practical dependence of the scheme on long-term maintenance, operational compliance and post-consent design detail. Where water-related significance is judged low or manageable, but the system depends on repeated inspection, penstock testing, filter drain cleaning and active maintenance over decades, the confidence that can be placed in those judgments is materially reduced.	Embedded mitigation measures for surface water runoff, flood risk and pollution management are contained within and secured by the relevant management plans for each phase of the Scheme – Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. The specificity of the outline management plans will be provided in the detailed management plans, which will be substantially in accordance with the outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032]. The approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032] A Preliminary Surface Water Drainage Maintenance Schedule has been prepared to outline initial details of likely maintenance activities and frequency for the surface water drainage systems. The surface water drainage maintenance plan will be

ID	Theme	Representation	Applicant's Response
			developed further in conjunction with the detailed drainage design which is secured through DCO Requirement 11.
BEPS-122	EIA Methodology	Landscape, heritage and visual mitigation rely excessively on future planting performance APP/7.2 makes plain that much of the operational landscape and heritage case depends on planting, woodland belts, hedgerow reinforcement, 3m managed hedgerow height and long-term vegetation establishment and maintenance. This is not just a landscape issue. It is part of the methodology by which the applicant seeks to reduce visual, heritage, glint and glare and amenity effects over time. The concern is that screening vegetation is being treated as durable and effective mitigation without adequate recognition of the lag period before establishment, the possibility of underperformance, disease, failure or maintenance variation, and the fact that some effects will occur regardless in the interim. This is especially important where the acceptability of built elements depends on those future landscape filters. The same issue arises in the use of lighting controls. APP/7.2 states that permanent lighting is generally not required, but that motion-sensing lighting will be provided for the BESS, project substations and National Grid substation, with detailed design to follow later and principles set out in the lighting strategy. For dark rural	The Green Infrastructure Strategy [AS-005] includes for visual screening and landscape integration. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Section 4.3 of the Outline LEMP [APP-199] outlines the monitoring approach used to assess progress towards the commitments defined within the Outline LEMP. Monitoring activities will document any establishment failures and any replacements required in accordance to meet the required landscape feature or habitat typology. Failed planting requiring replacement during the establishment period will be undertaken in accordance with best practices and with establishment

ID	Theme	Representation	Applicant's Response
		landscapes and light-sensitive receptors, especially bats, that is not the same as demonstrating a fixed and assessed final lighting solution.	measures set out in the Outline LEMP and LEMP. A detailed LEMP that will be submitted to and approved by the relevant planning authority will be substantially in accordance with the Outline LEMP, including the objectives, prescriptions and targets set out. The duration of management and monitoring for each landscape element created or enhanced will be in accordance with the Environment Act 2021 (to the extent applicable to the Scheme) and national and local policies. ES Volume 1, Chapter 11 – Landscape and Visual [APP-043] assesses effects of the Scheme at both Year 1 and Year 15 after commissioning, which is the typical period for the establishment of landscape planting. A detailed lighting design will be developed at the detailed design stage, setting out the precise locations of all proposed luminaires to be in compliance with the relevant lighting criteria.

ID	Theme	Representation	Applicant's Response
BEPS-123	EIA Methodology	Ecology and biodiversity controls remain dependent on future action rather than present certainty The policy appendix shows that the ecology chapter is anchored to the mitigation hierarchy, protection of irreplaceable habitats, coherent ecological networks and a wide range of CIEEM, Natural England and other guidance. APP/2.9 and APP/2.10 show the ecological sensitivity and connectivity of the receiving environment. Yet APP/7.1 and APP/7.2 show that ecology protection remains highly dependent on future surveys, future management and future licences. During construction, APP/7.1 relies on pre-construction walkovers, further protected species surveys and later licensing if required. During operation, APP/7.2 relies on the LEMP, future sensitive lighting strategy, EcoCoW involvement for replacement activities and even later badger licensing if new setts conflict with ongoing management. That is not merely a management matter. It goes directly to whether ecological baseline, effect pathway and mitigation deliverability have been established at the right stage. The examination should not be asked to assume that future surveys and licensing will bridge current uncertainty in circumstances where the site context is demonstrably sensitive and interconnected.	The Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] are designed with the objective of securing the relevant ecological mitigation measures. It also sets out monitoring and reporting arrangements to ensure mitigation measures remain effective. The Green Infrastructure Strategy [AS-005] demonstrates the proposed landscape and ecological measures, with the prescriptions and the management of ecological measures set out in the Outline LEMP [APP-199]. The Biodiversity Net Gain Report [APP-218] demonstrates that the Scheme is able to deliver, based on the Green Infrastructure Strategy [AS-005]. BNG is secured through Requirement 9 of the Draft DCO [AS-032].

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BEPS-124	EIA Methodology	Policy appendix APP/6.3.2.3 exposes the gap between listed standards and demonstrated compliance APP/6.3.2.3 is a valuable cross-cutting document because it lists, chapter by chapter, the legislation, planning policy and guidance the applicant says applies. But it also exposes the gap between naming standards and meeting them. For climate change, it records EN-1 requirements for whole-life GHG assessment, reduction steps at each stage, embodied carbon, operational emissions and a GHG reduction strategy, while acknowledging that the “reduction strategy” is dispersed across outline plans rather than presented as a standalone strategy. For landscape and visual it cites the need to assess light pollution, dark skies, cumulative effects, landscape character and early design mitigation. For water it identifies WFD, flood risk, water quality, water resources, water stress and drainage standards. For soils and agricultural land it confirms the policy preference for poorer quality land and the need to minimise impacts on BMV land and soil health. The problem is that the ES chapters and outline plans do not consistently demonstrate full compliance with the standards this appendix identifies. The appendix is therefore best used as a benchmark against which the deficiencies of the substantive ES chapters can be shown.	The Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. The Applicant considers that the Scheme is in accordance with national energy policy, national planning policy, and the relevant development plan when considered as a whole. In ES Volume 1, Chapter 6 - Climate Change [APP-042] the Applicant provides: a) whole-life GHG assessment which has evaluated GHG emissions associated with the Scheme across its entire lifespan (i.e. 60-years) b) embodied carbon values for construction, operation and maintenance, and decommissioning phases of the scheme c) Table 6.29 outlines the operational GHG emissions, and d) an overview of mitigation measures identified and proposed to be

ID	Theme	Representation	Applicant's Response
			implemented to ensure effectiveness and certainty in GHG reduction. The chapter sets out the environmental mitigation measures which are proposed to be adopted during the construction, operation and maintenance, and decommissioning phases of the Scheme, to support GHG reduction, whilst highlighting in Section 6.8.2 onwards the Outline CEMP [APP-196] and Outline OEMP [APP-197] documents, rather than a standalone item, that detail relevant measures which form the GHG Reduction Strategy as required in the NPS. The GHG Reduction Strategy is presented across the Outline CEMP [APP-196] and Outline OEMP rather than as a standalone document. This approach: • Embeds GHG reduction into operational management frameworks (ensuring implementation)

ID	Theme	Representation	Applicant's Response
			• Cross-references provided in ES Volume 1, Chapter 6 - Climate Change [APP-042] to enable full traceability • APP/6.3.2.3 itself serves as the consolidated policy compliance checklist. • Avoids duplication of content already secured through these outline management plans.
BEPS-125	EIA Methodology	Overall conclusion on Chapter 2 and cross-cutting methodology Taken together, Chapter 2, APP/7.18, APP/7.1, APP/7.2, APP/2.9, APP/2.10 and APP/6.3.2.3 do not give confidence that the likely significant effects of the development have been identified, assessed and controlled with the degree of certainty required for a lawful and reliable examination-stage ES. The recurring problems are consistent. The methodology is too generic. Important aspects of design remain parameter-based without adequate worst-case translation. Construction and operational controls are outline only. Material details are deferred to future detailed plans. The receiving environment is more connected and sensitive than a simple parcel-by-parcel reading suggests.	The Applicant refers to its response to BEPS-110 to BEPS-124. The ES has been prepared to identify and evaluate the likely significant effects of the Scheme on the environment and to identify measures to mitigate or manage any significant negative effects. In turn this will help to ensure decision makers are able to make an informed judgement on the environmental impacts of the Scheme. The ES has been prepared in accordance with relevant guidance as noted in paragraph 2.3.2 of ES Volume 1, Chapter 2 – EIA Methodology [APP-038].

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		Significance judgments appear overly dependent on broad matrices, professional judgment and optimistic management assumptions. Water protection, ecological performance, lighting control, visual mitigation and operational replacement all depend on future success rather than present certainty. In a project of this character, those are not minor matters of drafting. They go to whether the ES provides the Secretary of State with a sufficiently reliable evidential basis to understand the likely significant effects of the development, the realistic worst-case impacts, and the true extent of uncertainty that remains.	
BEPS-126	Cumulative Impact Assessment	Cumulative Assessment The cumulative assessment is not presented in a way that allows consultees or the Examining Authority to understand the real spatial scale of cumulative burden. Figure 2.1, labelled 'Cumulative Developments', does not show the actual order limits, footprints, cable corridors, substations, pylon works, land-take or physical spread of surrounding schemes. Instead, other developments are reduced to small point markers within a 25 km buffer. That may serve as a broad locator plan, but it is not an adequate cumulative effects map. It gives no meaningful sense of whether neighbouring schemes are small, large, linear, clustered, overlapping or directed at the same sensitive receptors. In a part of South Norfolk already experiencing	A comprehensive Cumulative and In Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate guidance as detailed within ES Volume 1, Chapter 2 EIA Methodology [APP-038]. Two types of cumulative effects have been assessed within the ES: • In-combination effects – the inter-relationship between individual development effects on one particular receptor; and Cumulative effects – multiple existing and/or approved developments generating additive effects which

ID	Theme	Representation	Applicant's Response
		multiple large-scale solar, BESS and grid proposals, that is a serious omission. This matters because cumulative and in-combination assessment depends on understanding the real relationship between schemes in space. A point-based map obscures whether East Pye Solar and other projects affect the same villages, the same conservation areas and listed buildings, the same PRowS, the same areas of BMV farmland, the same chalk-stream catchments, the same private water supply clusters, the same airfields and the same tranquil rural landscape. By failing to depict the extent and form of other schemes, the figure materially understates the density and concentration of infrastructure and weakens the reliability of the cumulative assessment as a whole. The same weakness feeds directly into Chapter 19. The in-combination effects chapter already adopts a highly aggregated approach, assessing broad receptor groups rather than specific places and relying on professional judgment rather than any mapped analysis of overlapping pressures. Where the underlying cumulative mapping does not show the scale or spread of other major schemes, there is an obvious risk that both cumulative impact and in-combination effects are diluted by abstraction. The result is an assessment framework that does not adequately communicate the true cumulative burden experienced on the ground.	together have an increased effect on the same receptors. ES Volume 3, Appendix 2.4 Cumulative Schemes [APP-116] details the cumulative schemes considered within the ES. Each topic chapter within the ES [APP-042 – APP-054] sets out how the particular topic area has considered and assessed the cumulative effects arising as a result of other existing or proposed development. A summary of all cumulative effects is provided within Table 20.4 of ES Volume 1, Chapter 20 - Summary of Residual Significant Effects [APP-056]. ES Volume 1, Chapter 19: In-Combination Effects Assessment [APP-055]. Provides an assessed of in-combination effects, where receptors are subject to residual effects under more than one environmental topic. In-combination effects have been considered during construction, operation, and decommissioning phases of the Scheme. It should be noted that the presentation of cumulative schemes as

ID	Theme	Representation	Applicant's Response
		East Pye Solar should therefore have provided a properly legible cumulative mapping set showing the actual boundaries and infrastructure extents of relevant cumulative schemes, differentiated by type and status, and at a scale sufficient to understand clustering and receptor overlap in South Norfolk. Without that, the cumulative and in-combination assessment is materially incomplete and should be given limited weight.	either points or boundaries within ES Volume 2, Figure 2.1 - Cumulative Development [APP-058] will have no impact on the cumulative effects assessments presented within each topic chapter, which already consider the full extent of relevant cumulative developments.
BEPS-127	EIA Methodology	Remedies sought For those reasons, the Examining Authority and Secretary of State are respectfully requested to give this objection substantial weight and to require the applicant to remedy these deficiencies before any conclusion is reached that the environmental information is adequate. The remedies sought are: first, a revised and genuinely scheme-specific EIA methodology explanation showing clearly how uncertainty, interrelationships, worst-case design parameters, professional judgment and cumulative effects have been handled across all chapters;	The Applicant refers to its response to BEPS-110, BEPS-112, BEPS-113, BEPS-119, BEPS-120, and BEPS-125.
BEPS-128	EIA Methodology	second, a clear schedule identifying every material matter currently deferred to future plans, with justification for why that deferral is lawful and why the issue could not and should not have been resolved at application stage;	The Applicant refers to its response to BEPS-114, BEPS-115, and BEPS-116.
BEPS-129	EIA Methodology	third, fixed and examination-stage details, or at minimum materially tighter controls, for cable crossing methods, drainage design principles, pollution safeguards, lighting controls, operational replacement assumptions and other	The Applicant refers to its response to BEPS-114, BEPS-115, BEPS-116, BEPS-117, BEPS-122, and BEPS-123.

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		matters currently left to future detailed CEMP/OEMP processes;	
BEPS-130	EIA Methodology	fourth, a revised explanation of how APP/7.18 parameters have been translated into a consistent worst-case assessment across all topics;	The Applicant refers to its response to BEPS-115.
BEPS-131	EIA Methodology	fifth, a fuller cross-cutting assessment of the operational replacement programme and its construction-like effects over the 60-year life of the scheme;	The Applicant refers to its response to BEPS-117.
BEPS-132	EIA Methodology	sixth, a more robust treatment of the connected ecological and hydrological baseline using APP/2.9 and APP/2.10 as spatial benchmarks; and seventh, topic-by-topic confirmation of how the applicant has substantively complied with the policy and guidance standards listed in APP/6.3.2.3, rather than merely citing them. In the absence of those remedies, the decision-maker should conclude that the ES remains materially uncertain and that significant aspects of environmental assessment and mitigation have been left to post-consent stages in a manner that should attract substantial weight against the grant of development consent.	The Applicant refers to its response to BEPS-118 and BEPS-124
BEPS-133	Chapter 3: The Order Limits	Introduction Chapter 3 is presented as the chapter that describes “the area within which the Scheme would be situated and the surrounding area.” It should therefore provide the Environmental Statement’s framing description of the land, receptors, constraints and surrounding context against	ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear and accurate description of the Order Limits, including site naming, site locations and areas, and key environmental and planning constraints

ID	Theme	Representation	Applicant's Response
		which all later topic chapters are read. It does not do so adequately. Instead, it largely reduces the Scheme to parcel definitions, site areas, corridor widths, and selective feature lists, while pushing the real environmental meaning of the Order Limits into later topic chapters. That matters because East Pye Solar is not a compact or simple site. Chapter 3 itself confirms that the Scheme comprises ten sites and multiple sub-sites, a BESS site, up to three 400 kV substations, three 132 kV substations, a new National Grid substation, underground and potentially overhead grid connection infrastructure, a broad cable route corridor, and highway works. A chapter describing such Order Limits should give a clear, integrated account of a large, fragmented, infrastructure-heavy intervention across settled rural Norfolk. Instead, Chapter 3 understates that reality and thereby understates the significance of the receiving environment from the outset.	within and surrounding the Order Limits. The Order Limits are also shown visually on ES Volume 2 Figure 1.1 - Location Plan [APP-057]. As set out within Chapter 3, a detailed description of the baseline conditions for each environmental topic is provided within the respective ES topic chapters [APP-042 to APP-056].
BEPS-134	Chapter 3: The Order Limits	The Chapter misdescribes the Scheme as a set of land parcels rather than a dispersed industrial intervention The first defect is one of characterisation. Chapter 3 defines the Order Limits as the maximum extent of land anticipated to be acquired and/or used for construction, operation, maintenance and decommissioning, and then lists the scheme components: ten sites, sub-sites, a BESS site, multiple substations, a National Grid substation, a cable route corridor, overhead line works and highway works. It also states that the cable route corridor is typically	ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear and accurate description of the Order Limits, which are defined as the maximum extent of land anticipated to be required for the construction, operation and maintenance, and decommissioning phases of the Scheme. Chapter 3 is not intended to

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		50 metres wide, narrowing to about 13 metres in constrained locations and widening up to 405 metres to allow flexibility for detailed design and temporary construction compounds. That description demonstrates that this is not a single coherent "site" in any ordinary sense. It is a dispersed network of works stretching across a wide rural area, with multiple land-takes, multiple interfaces, and multiple affected communities. Yet Chapter 3 does not confront that central fact in evaluative terms. It does not explain how the fragmentation of the Order Limits itself is a defining environmental characteristic of the Scheme. It therefore fails to frame properly the extensive geographic spread, the industrialisation of multiple separate landscapes, and the cumulative burden imposed by the scheme's very form.	provide an assessment of the impacts of the Scheme.
BEPS-135	Chapter 3: The Order Limits	Chapter 3 fails to provide an integrated description of the receiving environment Paragraph 3.4.1 is particularly revealing. It states that key environmental and planning constraints are shown on another figure, and that further detail regarding baseline conditions is provided in Chapters 6 to 20. That is not an adequate substitute for a proper Chapter 3 description. A chapter called "The Order Limits" should not merely point the reader elsewhere for the substance of the receiving environment. It should synthesise the overall environmental setting of the Order Limits and explain, in	The Applicant refers to its response to BEPS-133.

ID	Theme	Representation	Applicant's Response
		one place, why this land is sensitive, constrained and interrelated. Instead, the chapter provides only a thin summary and leaves the reader to reconstruct the real baseline by piecing together later chapters. That approach fragments the baseline and obscures cross-cutting sensitivities at the very point where the ES should be orientating the decision-maker. For a project of this scale and dispersal, that is a material weakness.	
BEPS-136	Chapter 3: The Order Limits	The landscape description is reductive and strips out the qualities that make this place sensitive The landscape section says there are no statutory landscape designations covering the sites or within 5 km, that the Broads National Park lies 3.9 km from Sub-Site 10A, that the topography is predominantly flat, and that the sites are bordered by trees and hedgerows. Those statements are not false, but they are incomplete to the point of distortion. They reduce the surrounding landscape to a sparse physical summary and fail to describe the qualities that actually matter to this project: the settled historic character of the countryside, the intervisibility between villages and fields, the importance of hedgerow structure, the presence of woodland blocks, the role of local topography and openness in framing views, and the way this dispersed scheme would be experienced across a living rural landscape rather than on an abstract map.	As signposted within Chapter 3, A description of the landscape and visual baseline is provided within ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. ES Volume 3, Appendix 7.2 - Landscape Baseline [APP-119] provides further detail on the baseline landscape receptors. Landscape receptors comprise landscape designations, landscape character and key characteristics, landscape features, and specific aesthetic or perceptual aspects of the landscape, within the Study Area. ES Volume 3, Appendix 7.4 - Visual Baseline [APP-121] provides further detail on the visual baseline (people's

ID	Theme	Representation	Applicant's Response
		A lawful and fair chapter should have described the Order Limits as lying within a settled agricultural landscape where the absence of national landscape designation does not equate to an absence of landscape sensitivity. Instead, Chapter 3 uses the lack of statutory designation as a kind of neutralising shorthand. That is not an adequate account of the true receiving environment.	views and visual amenity), within the Study Area. For each element, an overview of the visual baseline summarising the visual characteristics of the site in relation to the wider landscape is defined, then the theoretical visibility and visual envelope is set out. Following this, the visual receptors relevant to the Scheme are established, and view locations selected. ES Volume 3, Appendix 7.5 - Photosheets [APP-122] presents photography for each View Location.
BEPS-137	Chapter 3: The Order Limits	The chapter underplays the extent to which the Order Limits lie within a settled and inhabited countryside Although Chapter 3 includes Table 3.1 of nearby residential features, the overall presentation still minimises the fact that the Scheme is interwoven with existing settlements and isolated dwellings. The chapter records, for example, residential areas and dwellings close to multiple sites, including properties within 75 metres of Sub-Site 1A and 120 metres of Sub-Site 1B. The same point is repeated across other sites in the table. Yet the chapter does not describe the Order Limits as what they are: a scheme threaded through a populated rural	ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear description of nearby residential features within Table 3.1, with details provided for each Site and CRC. Baseline conditions and sensitive receptors relevant to each technical assessment are detailed within the ES topic chapters [APP-036 to APP-195].

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		landscape, not a remote tract of unconstrained land. The proximity of villages, farmsteads and individual homes is not a minor adjacent feature. It is one of the defining characteristics of the Order Limits. By presenting residential receptors mainly as tabulated distances rather than as part of the essential character of the scheme area, the chapter understates human sensitivity from the outset.	
BEPS-138	Chapter 3: The Order Limits	The chapter fails to present heritage sensitivity as a defining characteristic of the Order Limits Chapter 3 includes a table of listed buildings, but again the treatment is atomised and selective rather than thematic. The broader East Pye material already shows why that is problematic. The scoping approach itself adopted a narrow method for some areas, reporting Grade II listed buildings only up to 100 metres because of their prevalence, with other assets deferred to later assessment. That very prevalence is the point. It demonstrates that the landscape through which the Order Limits pass is rich in historic buildings and heritage settings. A proper Chapter 3 should therefore have explained that the Order Limits run through a heritage-dense rural landscape of villages, churches, farmsteads and designated assets whose setting relationships are part of the ordinary baseline, not a specialist afterthought. Instead, heritage is treated as a list of assets rather than as a spatial characteristic of the receiving environment. That	Table 3.2 of ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear description of listed buildings within 1km of the Site, with details provided for each Site and CRC. Chapter 3 also details sites designated for their cultural heritage value within the local area. As signposted within Chapter 3, a full description of the cultural heritage baseline is provided within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]. The cultural heritage baseline has been derived from desk and field-based studies including: an archaeological desk-based assessment; heritage statement; geophysical survey; aerial photography assessment; and a trial trench evaluation.

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		weakens the framing of later heritage and landscape assessment.	
BEPS-139	Chapter 3: The Order Limits	Hydrology and water sensitivity are not properly described at Order Limits level. Water is central to East Pye, but Chapter 3 does not describe the Order Limits in a way that properly foregrounds hydrological sensitivity. The chapter refers only at a high level to existing conditions and leaves detail to later chapters. That is inadequate in this case. The scoping and consultation material already made clear that the red line includes several main rivers, ordinary watercourses and WFD waterbodies, that the River Tas is within the red line boundary, and that crossings and associated construction methods would be critical to environmental effects. Similarly, the wider scoping material records that parts of the scheme, including the BESS site, lie within Source Protection Zone III and a drinking water safeguard zone, above principal and secondary aquifers. Those are not marginal technical details. They are foundational characteristics of the land within and surrounding the Order Limits. A chapter describing those limits should have made clear that this is a hydrologically sensitive and groundwater-relevant scheme area where drainage, water supply, aquifer protection and watercourse crossings are integral constraints. It did not.	ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear description of the baseline, including relevant Flood Zones, surface water flooding risk, principal watercourses, and ordinary watercourses. Table 3.3 also summarises the ground conditions for each site, including Aquifer classifications. As signposted within Chapter 3, a full description of the water environment baseline is provided within ES Volume 1, Chapter 9 – Water Environment [APP-045]. Chapter 9 includes a description of existing baseline with respect to hydrology, flood risk, water quality, and water resources.

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BEPS-140	Chapter 3: The Order Limits	Utilities and buried infrastructure constraints are under-described or absent Chapter 3 should also have described the Order Limits as land already containing and interacting with nationally significant and local utility infrastructure. That matters because utility interfaces are not merely engineering details; they define what land can safely and lawfully be used and how. The scoping response material records that Anglian Water assets may lie within the project area and that such interfaces should be identified early, mapped, designed around and planned for within the Order Limits The wider objection material also identifies the omission of the high-pressure gas main as a major constraint and safety receptor crossing several sites and corridors, requiring mapping, risk assessment and protective measures. Whether considered under Chapter 3 itself or in linked plans and figures, the Order Limits chapter should have presented the land as constrained by existing strategic infrastructure and easements. It does not do so clearly or fully. That omission contributes to a sanitised baseline.	It is acknowledged that ES Volume 1, Chapter 3 - The Order Limits [APP-038] does not include a description of utilities or buried infrastructure constraints, however this information is presented elsewhere within the ES. Section 18.3 of ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] presents an assessment of the likely effects on telecommunications, utilities, and television receptors. Information provided by the utilities providers on the assets within the Order Limits is shown on ES Volume 2, Figure 18.1 - Utilities Plan [APP-110].
BEPS-141	Chapter 3: The Order Limits	The chapter normalises flexibility rather than explaining its environmental consequences The width of the cable route corridor and the range of works within it are especially important. Chapter 3 says the corridor can widen up to 405 metres to allow flexibility for detailed design and temporary construction compounds,	ES Volume 1, Chapter 3 - The Order Limits [APP-038] is not intended to provide an assessment of the impacts of the Scheme. ES Volume 1, Chapter 4 – The Scheme [APP-040] includes a

ID	Theme	Representation	Applicant's Response
		and that working widths will vary for crossings of watercourses, roads and utilities. For a project crossing such a broad range of receptors and constraints, flexibility is itself an environmental issue. A wide corridor with shifting working widths, narrowing and widening around hedgerows, ponds, utilities and crossings, means that the real land take and the real pattern of effects remain fluid over a large area. Chapter 3 presents that flexibility as a neutral design feature, but it does not explain its implications for the reliability of baseline description. A proper account should have made clear that the Order Limits encompass a much wider swathe of potentially affected land than the eventual permanent footprint, and that this increases uncertainty for communities, landowners and the environmental assessment. That point is largely absent.	description of the Cable Route Corridor. Chapter 4 clarifies that the exact location of the Grid Connection Cables within the Cable Route Corridor will be determined at the detailed design stage. The voltage of the cables and the number of circuits will affect the width and number of the cable trenches required. The width and spacing of the cable trenches will depend on environmental constraints, engineering requirements, or crossing third party apparatus. This includes separation distances where multiple cables are running in parallel within the same trench or within multiple trenches.
BEPS-142	Chapter 3: The Order Limits	The chapter does not properly reflect the concerns raised at scoping stage about the need for fuller description The Planning Inspectorate's Scoping Opinion required fuller clarity in the ES on matters such as access points, underground cables, HDD parameters, construction compounds, operation, decommissioning and restoration. A framing chapter on the Order Limits ought to have responded by giving a more concrete, integrated description of the physical land envelope and the way works would relate to surrounding receptors and constraints. Instead, the chapter remains largely	ES Volume 1, Chapter 3 - The Order Limits [APP-039] is not intended to provide a description of the Scheme, or an assessment of the impacts of the Scheme. A description of the Scheme is provided in ES Volume 1, Chapter 4 - The Scheme [APP-040]. The likely significant effects of the Scheme are assessed within each topic chapter [APP-042-APP-054].

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		administrative in tone, with site areas, NGRs, corridor widths and references out to other chapters. That is not enough. The result is that the ES still does not begin from a clear and candid account of what these Order Limits mean in environmental terms.	
BEPS-143	Chapter 3: The Order Limits	Why this matters to the ES as a whole This is not a merely stylistic complaint. Chapter 3 is the gateway through which the whole ES is read. If that chapter presents the Order Limits as a collection of land parcels with some nearby receptors, rather than as a dispersed industrial scheme imposed across a settled, heritage-rich, ecologically and hydrologically sensitive, infrastructure-constrained rural landscape, then every later chapter is read against a diminished baseline. The problem is therefore structural. The chapter's thin and selective framing risks normalising the scheme's spread, masking the significance of fragmentation, and underplaying the density of constraints and receptors embedded within the Order Limits. In a project of this size and complexity, that is a material deficiency. Conclusion Chapter 3 fails to provide a fair, integrated and environmentally literate description of the Order Limits and their surroundings. Although presented as the foundational descriptive chapter of the Environmental Statement, it largely reduces the Scheme to parcel nomenclature, site	For the reasons set out within responses to BEPS-133 to BEPS-142, the Applicant does not consider that ES Volume 1, Chapter 3 - The Order Limits [APP-039] understates the sensitivity of the receiving environment or weakens the reliability of the ES baseline as a whole.

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		areas, corridor dimensions and selective feature lists, while deferring the true substance of the receiving environment to later topic chapters. On its own text, however, the Scheme is plainly a large, fragmented and infrastructure-heavy intervention extending across ten sites, multiple substations, a BESS, a new National Grid substation, a broad cable route corridor and associated highway works. The chapter does not adequately describe the extent to which those Order Limits lie within a settled, inhabited, heritage-rich, ecologically and hydrologically sensitive and utility-constrained rural landscape. It therefore understates the sensitivity of the receiving environment and weakens the reliability of the ES baseline as a whole.	
BEPS-144	Chapter 3: The Order Limits	Remedies sought The Applicant should be required to produce a revised Chapter 3, or equivalent supplementary environmental information, that properly describes the Order Limits as an interconnected environmental setting rather than a parcel schedule. That revision should provide a clear integrated narrative and mapping of settlement proximity, heritage density, hydrology and groundwater sensitivity, watercourses and crossings, utility and strategic infrastructure constraints, rights of way, and the practical implications of the scheme's fragmentation and corridor flexibility. It should also explain the environmental significance of the wide and shifting cable corridor, temporary compounds, highway works and grid infrastructure in a way that allows consultees and the	The Applicant does not intend to update ES Volume 1, Chapter 3 - The Order Limits [APP-039] in this regard. The Applicant refers to its response to BEPS-133 to BEPS-142.

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		Examining Authority to understand the real land envelope and the real receiving environment. Unless and until that is done, the Chapter 3 baseline should be treated with caution and the Applicant's conclusions elsewhere in the ES should not be accepted at face value where they rely on this incomplete framing of the Order Limits.	
BEPS-145	Chapter 4: Scheme Description	Chapter 4 – The Scheme Introduction BEPS objects to the proposed development on the basis that the scheme description, associated plans and supporting illustrative material do not provide a sufficiently clear, fixed and intelligible account of what is actually proposed. Chapter 4 is a foundational chapter of the Environmental Statement because it purports to define the physical characteristics of the Scheme and the activities to be undertaken during construction, operation, maintenance and decommissioning, and expressly states that it informs the technical assessments in ES Chapters 6 to 18. That matters because if the project description is uncertain, overly flexible, internally inconsistent or reliant on later clarification, then the whole EIA is weakened. The Scheme must be described with sufficient precision to permit proper scrutiny of its likely significant effects. Here, the chapter text, maps and 'illustrative' engineering drawings instead reveal a project that remains elastic in important respects while simultaneously confirming a far more industrial and	The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme. The Applicant refers to its response to BEPS-146 to BEPS-158.

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		extensive form of development than the narrative often suggests.	
BEPS-146	Chapter 4: Scheme Description	Chapter 4 does not provide a sufficiently fixed and intelligible project description Chapter 4 describes a solar generating station of over 100 MW with associated development including a BESS, up to three 132 kV project substations, up to three 400 kV project substations, grid connection infrastructure and a new National Grid substation. It also divides the authorised development into multiple overlapping work areas and very broadly describes associated development ranging from cabling and substations to landscaping, drainage, access, biodiversity measures and works to modify overhead lines. This is not a minor concern of drafting form. The more extensive and dispersed the development, the greater the need for clarity. Yet Chapter 4 still presents important aspects of the project through a broad envelope rather than a tightly bounded and assessable scheme description. That is especially problematic because the Planning Inspectorate had already made clear in the scoping opinion that the ES needed fuller detail on installation methods, BESS characteristics, cable routeing, access points, HDD parameters, temporary compounds, operation and maintenance, decommissioning and restoration, and the justification for maximum design parameters where flexibility was being retained.	The Design Principles, Parameters and Commitments [APP-213] set out the maximum and, where necessary, minimum parameters with the spatial extents shown on the Works Plan [AS-002 and AS-003]. The Scheme has Work Nos as described in Schedule 1 of the Draft DCO and does not have a detailed design at this stage. The Applicant is seeking flexibility in design parameters to allow for technological advancement to maximise energy production. For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and allow for a decision on the technology choice to be made at the point of procurement. The Planning Inspectorate's Advice Note Nine:

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		The objection is therefore not simply that there is "flexibility," but that the retained flexibility is still too wide in material respects for the public and decision-maker to know with confidence what is actually being assessed.	Rochdale Envelope acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme to be considered. ES Volume 1, Chapter 4 – The Scheme [APP-040] details the Scheme parameters considered by the technical authors as part of the EIA to assess realistic worst-case effects for each potential receptor. Topic chapters detail assumptions and limitations where relevant.
BEPS-147	Chapter 4: Scheme Description	Inadequate definition of principal infrastructure, especially BESS, substations and grid connection works The Scheme includes the elements most likely to generate major concerns as to visual intrusion, industrialisation of the countryside, safety risk, operational impacts and land-take: the BESS, multiple 132 kV and 400 kV substations, grid connection infrastructure and the National Grid substation. These are not secondary details. They are core parts of the development. The scoping opinion specifically required fuller detail as to the physical characteristics and technical capacity of the	ES Volume 1, Chapter 4 – The Scheme [APP-040] provides a description of the Scheme components, including the BESS, Project Substations, Grid Connection Infrastructure, and the National Grid Substation. The EIA has been undertaken in accordance with the Rochdale Envelope approach. All technical chapters determine and assess the

ID	Theme	Representation	Applicant's Response
		BESS, including the battery technology/specification and anticipated number of battery units. That requirement arose for good reason. Unless the BESS and major electrical infrastructure are adequately fixed and described, the assessments of major accidents and disasters, groundwater contamination risk, human health, operational noise, landscape effects and heritage setting effects cannot be robust. Appendix 4.1 reinforces this concern. Rather than narrowing uncertainty, it provides only "illustrative technical information" for elements such as a BESS site power conversion unit, substation fencing, CCTV, access tracks and a water tank. The very fact that this infrastructure is still being shown in illustrative rather than definitive form underlines the continuing looseness of the project description.	maximum parameters where flexibility needs to be retained as under the Rochdale Envelope Approach. The assessments presented within the ES are therefore considered to assess a likely reasonable worst-case scenario. It is necessary that there will be some flexibility built into the design of the Scheme when submitting the DCO Application so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovations in technology. This is of particular importance in order to maintain flexibility due to the rapid pace of change in BESS technology, whilst maintaining a robust and comprehensive assessment of potential effects. The maximum parameters for the BESS are detailed within ES Volume 1, Chapter 4 – The Scheme [APP-040]. The illustrative information provided within ES Volume 3, Appendix 4.1 - Illustrative Technical Information [APP-117] does not form the basis of assessments within the ES.

ID	Theme	Representation	Applicant's Response
BEPS-148	Chapter 4: Scheme Description	The industrial character and physical scale of the Scheme Appendix 4.1 is particularly significant because it translates abstract descriptions into dimensions and engineering forms. It shows, among other things, tracker panel mounting structures with a maximum overall height of 4.5 m and a 55° tilt, metal palisade substation fencing 3.0 m high with a 5.0 m gate, CCTV poles of 4.0 m total height, internal access tracks 3.5-5.0 m wide with aggregate sub-base over geotextile and compacted soil, construction compounds of 100 x 100 m and 130 x 130 m, and a substantial BESS-site water tank. These drawings reveal the true industrial character of the proposal more candidly than the chapter text. They show that this is not simply a set of low, recessive field-edge installations. It is a highly engineered industrial development spread across a rural landscape. That in turn strengthens objections on landscape, heritage, soils and agriculture, and construction impact. However, the appendix is also expressly illustrative. That means the applicant is relying on representative engineering examples rather than a fixed statement of what will actually be built. This combination — concrete industrial form but continuing design flexibility — is precisely why Chapter 4 remains inadequate as the definitive description of the Scheme.	ES Volume 3, Appendix 4.1 Illustrative Technical Information [APP-117] is provided to aid the readers understanding of the Scheme. Chapter 4 also includes a series of images showing typical Scheme components. However, this illustrative information does not form the basis of assessments within the ES. The ES is based on a set of maximum parameters (as described in ES Volume 1, Chapter 4 – The Scheme [APP-040]) in line with the Rochdale Envelope approach, to assess a likely reasonable worst-case scenario. The illustrative information provided within ES Volume 3, Appendix 4.1 Illustrative Technical Information [APP-117] does not form the basis of assessments within the ES.

ID	Theme	Representation	Applicant's Response
BEPS-149	Chapter 4: Scheme Description	Construction phase impacts are wider, more fragmented and more intrusive than the chapter text suggests Figure 4.3, 'Key Construction Phase Features' maps not only the Order Limits and cable route corridor, but also avoidance areas, highway works, temporary construction compounds, crossings, highway accesses and highway/crossing points across the whole Scheme. The figure shows that the construction phase is not a contained on-site activity. It is a corridor-based and road-based programme extending across the full geography of the project, from the BESS / Site 1 hub in the west through the central parcels and onward to the eastern sites. The enlarged sheets show repeated construction access points, crossing points and highway improvement areas in multiple locations, including the central corridor around Tharston, Long Stratton, Hempnall and Fritton, and the eastern linkage to Sites 8, 9 and 10. That matters because it confirms that the temporary construction footprint is much wider than the generating parcels themselves. It also demonstrates fragmentation: the project depends on a dispersed network of compounds, highway accesses and crossing interventions. Yet the figure operates mainly as a location diagram. It identifies where these interventions are proposed, but not their engineering detail, extent of land-take, duration, heritage sensitivity, ecological implications, or road-safety consequences in any intelligible way. It therefore supports	Section 4.4 of ES Volume 1, Chapter 4 – The Scheme [APP-040] describes the Construction Phase, including details relating to programme, construction activities, construction compounds, construction traffic, and access to the Order Limits. Mitigation measures and management of traffic and access are set out in the Outline CTMP [APP-201] and Outline OTMP [APP-202] and the management of PRow is described in Outline PRowPPMP [APP-203] to minimise impacts as far as practicable.

ID	Theme	Representation	Applicant's Response
		the objection that the construction phase is extensive and intrusive, but still inadequately described.	
BEPS-150	Chapter 4: Scheme Description	'Highway improvement areas' and construction access interventions remain inadequately explained Figure 4.3 repeatedly labels 'Highway Improvement Areas,' particularly around the western and central parts of the Scheme. That is important because it visually confirms that the project cannot simply be delivered from the existing road network without further intervention. But the figure does not make plain what those highway improvements involve in each case: widening, verge works, removal of vegetation, alterations to junctions, engineering of accesses, treatment for abnormal indivisible loads, or temporary works of another kind. A map which shows multiple highway intervention points but does not disclose their actual content cannot be regarded as a complete or intelligible description of the construction phase. This lack of transparency is not cured by the existence of a broad works plan. It instead reinforces the concern that the public are being shown where disruption will occur without being given sufficient detail as to what is being done, how long it will last, and what the local effects will be.	Highway Works will support the safe movement of construction vehicles along narrower sections of the local road network and reduce potential disruption to the public highway. The Highway Works will contain localised improvements to deteriorated road edges or temporary highway and traffic works. Highway Works that have provisionally been identified where the AIL may overrun or oversail are identified in the Outline CTMP [APP-201], along with the likely and suitable access routes to the Scheme. Site access design, vehicle tracking and swept-path analysis has also been undertaken to assess the suitability of access as included in Appendix C of the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]. The Highway Works are shown on the Works Plans [AS-002] and [AS-003]. The Scheme has Work Nos as described in Schedule 1 of the Draft DCO and does not have a detailed

ID	Theme	Representation	Applicant's Response
			design at this stage. Requirements for AIL (for elements such as transformers and cable drums) will be determined through the detailed design process and in consultation with statutory consultees. Any street furniture removal required will be temporary and will be reinstated, as set out in the Outline CTMP [APP-201]. The Outline CEMP [APP-196] sets out management measures in relation to tree pruning, including an Arboricultural Method Statement will be adopted and that the pruning works will be implemented by a suitably qualified arboricultural Contractor working in accordance with British Standard 3998: 2010 'Tree Work – Recommendations.
BEPS-151	Chapter 4: Scheme Description	Outdated and inconsistent mapping undermines confidence in the scheme description Figure 4.2, the indicative temporary construction compound locations plan, appears to use an outdated base map that does not include the Long Stratton Bypass. The Works Plan also uses an outdated map. By contrast, Figure 4.3 uses a more contemporary mapping base for the construction-phase features.	The Applicant acknowledges that there are figures with base mapping that do not show the Long Stratton Bypass, such as ES Volume 2, Figure 4.2 Indicative Temporary Construction Compound Locations [APP-060]. The Applicant has considered the Long Stratton Bypass as part of the

ID	Theme	Representation	Applicant's Response
		This inconsistency is not a mere cartographic quibble. The Long Stratton Bypass materially altered the transport baseline, movement patterns and the receiving environment around Long Stratton. If one of the Scheme's core construction figures that raises concern that the project description and associated construction mapping have not been prepared against a consistent and reliable contemporary baseline. For a project so dependent on road-based construction logistics, highway works, access points and cumulative traffic assessment, this is a serious problem. It undermines confidence in the accuracy of the construction-phase description and supports the broader concern that the ES mapping suite has not been prepared with sufficient rigour.	assessments presented in the ES [APP-036 to APP-195], as appropriate. The OS basemaps presented on the plans and figures do not affect the assessments provided as part of the DCO Application. Nonetheless, at Deadline 1, the Applicant intends to update the OS basemaps of the Works Plan and the main suite of other plans submitted with the DCO Application to show the Long Stratton Bypass. In the meantime, the Land Plan [APP-006] submitted with the DCO Application already shows the Long Stratton bypass on the OS basemap. Please refer to the Land Plan to view the proximity of the Long Stratton bypass with the Order Limits.
BEPS-152	Chapter 4: Scheme Description	The Works Plan uses an outdated base map and is too dependent on coded work numbers and layered interpretation The Works Plan still relies on a pre-bypass base map. It is a large layered document comprising an index plan and 19 sheets at 1:2,500 scale. It explains that users should open the PDF in Adobe Acrobat and toggle individual work layers on and off to see the extent of specific works as	The Applicant refers to its response to BEPS-151 regarding the OS basemaps. The Applicant's position is that the Work Plans provide the necessary detail to understand the spatial layout of the Works required for the Scheme. The function of toggling the layers can

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		described in Schedule 1 of the Draft DCO. Only a paid subscription to Adobe allows that functionality. That approach creates practical and legal concerns regarding accessibility. The visible legend on the sheets lists the coded works numbers, but does not itself explain in plain English what each coloured shaded area means on the ground. The document effectively requires the reader to cross-refer back to Schedule 1 of the Draft DCO and, ideally, to use the layered PDF rather than the flat document. This means that a core DCO plan is not readily intelligible as a standalone document to an ordinary interested party. The issue is not simply usability. It goes to whether the project has been described in a clear, accessible and transparent manner. A works plan that is only properly understandable when used in a specialised layered format requiring a software subscription, and decoded against another legal document does not assist meaningful public scrutiny.	be a useful tool to see individual Works, but is not a requirement to understand the layout of all the Works. The Applicant provided a detailed step-by-step explanation on how to access and view the Works Plan in Section 1.1 of the Works Plan [AS-002] and [AS-003]. In addition to the above, USB memory sticks with the full suite of application documentation were made available for electronic inspection during the Relevant Representation period via computer, free of charge, at the following libraries: Long Stratton Library, Loddon Library, Poringland Library and Bungay Community Library. Further details on this have been published on the Applicant's website. The DCO application documents were made available in hard copy format on request by contacting the Applicant's communication channels, with reasonable printing costs depending on the number/size of documents requested. Furthermore, USB memory

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			sticks were available to be sent directly to individuals upon request.
BEPS-153	Chapter 4: Scheme Description	Figure 5.1 confirms the exceptional density of constraints Figure 5.1, 'Environmental Constraints and Key Features' confirms the density of environmental and heritage receptors surrounding the Scheme. It maps listed buildings by grade, conservation areas, registered parks and gardens, SSSIs, SACs, SPA, Ramsar, NNR, LNR, County Wildlife Sites, Roadside Nature Reserves, scheduled monuments, ancient woodland, flood zones, land above 3% gradient, major roads, urban areas, the Norwich Main Substation and the existing overhead line. However, the figure is presented at such a broad scale and with such dense symbology that it functions more as a generalised regional background map than as an intelligible parcel-scale constraints plan. It demonstrates that the Scheme sits in a highly constrained receptor-rich landscape, but it does not allow the reader to assess proximity, pathway, hydrological linkage, visibility, interrelationship of designations, or the relationship between specific works and specific receptors. It is therefore an admission by the applicant of the sensitivity of the receiving environment, but not a substitute for a proper scheme-specific constraints assessment. It also omits or fails to make legible several of the categories central to objectors' concerns, including the more specific receptor-pathway relationships for water supplies,	ES Volume 2, Figure 5.1 Environmental Constraints and Key Features [APP-062] has been produced to support ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], and as such shows the environmental constraints within a 20km radius of the Norwich Main Substation. ES Volume 1, Chapter 3 - The Order Limits [APP-038] provides a clear description of the Order Limits. Baseline conditions and sensitive receptors relevant to each technical assessment are detailed within the topic chapters [APP-036 to APP-195].

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		ecological movement corridors, and other localised constraints.	
BEPS-154	Chapter 4: Scheme Description	The Scheme sits in an exceptionally constrained receiving environment Even in its compressed form, Figure 5.1 is enough to show that the Order Limits are embedded in a landscape containing a very large number of designated and sensitive receptors. The site is not a blank or environmentally spare location. It is a receptor-dense landscape of heritage assets, ecological designations, flood-sensitive land and varied topography. This intensifies the need for a precise and transparent project description. In a highly constrained environment, vague or overly flexible drafting is more harmful because small differences in location, dimensions, access arrangements, fencing, CCTV, track construction, lighting or compound size can materially alter effects. Chapter 4 does not meet that higher standard of precision.	The Applicant refers to its response to BEPS-146 regarding design flexibility and the Rochdale Envelope approach.
BEPS-155	Chapter 4: Scheme Description	Construction compounds and temporary works are industrial in scale Appendix 4.1's construction compound drawings show indicative compounds of 100 x 100 m and 130 x 130 m containing office and welfare units, storage containers, laydown areas, parking, turning areas, reception areas, wheel washers and vehicle swept paths. This confirms that	ES Volume 1, Chapter 4 – The Scheme [APP-040] provides a description of the temporary construction compounds, with the locations shown in ES Volume 2, Figure 4.2 - Indicative Temporary Construction Compound Locations [APP-060] .

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		construction compounds are not minor ancillary features. They are substantial industrial spaces. That matters because Chapter 4 and its figures do not fully communicate the likely visual and operational significance of those spaces, particularly in proximity to villages, lanes, heritage assets and agricultural land. Where temporary compounds of this scale are proposed, the ES should be explicit about dimensions, duration, fencing, lighting, surfacing, traffic intensity and restoration, not rely on generalised statements or indicative diagrams. The land proposed at site 6 as a construction compound is also proposed as an environmental mitigation area and was reportedly removed from the infrastructure plans as it is surrounded by Listed Buildings. Its use as a construction compound is not compatible with these environmental mitigation and its own impact on the Listed buildings has not been assessed.	The Design Principles, Parameters and Commitments [APP-213] set out the maximum parameters for the temporary construction compounds. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters. Site 6 was considered unsuitable for Solar PV Arrays owing to a combination of factors, including proximity to Listed Buildings, as detailed in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]. As shown in Works Plan Part 1 [AS-002] no compounds are present within the boundaries of Site 6; however, a temporary construction compound will be present within the Cable Route Corridor immediately to the north. Impacts to Listed Buildings along the Cable Route Corridor have been assessed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by ES Volume 3, Appendix 10.1 – Heritage

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			Statement [APP-165 – APP-168]. Compounds are considered to have been sited to be sufficiently removed from heritage assets as to avoid or minimise (as practicable) impacts within their settings. These effects would be of a temporary (short-term) duration and would ultimately be reversible, meaning that the scale of effects would soon return to their previous setting unchanged.
BEPS-156	Chapter 4: Scheme Description	Access tracks and ground treatment confirm engineering and compaction impacts on agricultural land The illustrative internal access track detail shows a 3.5-5.0 m wide track made up of permeable aggregate, a minimum 30 cm aggregate sub-base, geotextile and compacted soil. This is a material point for soils and agricultural land. The use of the term 'compacted soil' and the need for a substantial engineered track section demonstrate that internal infrastructure is not agriculturally neutral. Even where the surfacing is described as permeable, the engineering treatment of the land is significant. That supports the objection that the Scheme's operational and construction infrastructure has more serious implications for soil condition, agricultural use and restoration than the chapter text tends to imply. This is particularly significant	The potential effects of access tracks have been considered in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. This concludes that these areas are capable of full restoration without adverse effects or loss of land of BMV quality.

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		regarding its effects on BMV land across the proposed haul routes.	
BEPS-157	Chapter 4: Scheme Description	Security and ancillary infrastructure are not minor or visually negligible The illustrative drawings also show deer fencing panels of 2.5 m height, substation palisade fencing at 3.0 m, CCTV poles of 4.0 m height, and other security-related infrastructure. Such features are not trivial. In a rural landscape of historic villages, scattered farmsteads and open views, they contribute to the industrialisation of the countryside and affect both landscape character and the setting of heritage assets. Yet the chapter-level scheme description tends to bundle such elements into generic references to 'fencing', 'security' or 'ancillary development'. That understates their real significance. The public are entitled to understand that the project includes extensive perimeter and operational security infrastructure of substantial height and overtly industrial appearance.	ES Volume 1, Chapter 4 – The Scheme [APP-040] provides a description of fencing and security, with illustrative images provided to aid reader understanding. The Design Principles, Parameters and Commitments [APP-213] set out the maximum parameters for fencing, lighting, and security. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters, including for fencing, lighting, and security. The likely significant effects of the Construction Phase of the Scheme are assessed within each topic chapter [APP-042-APP-054].
BEPS-158	Chapter 4: Scheme Description	Chapter 4 still pushes too much essential understanding into other documents Chapter 4 tells the reader that it should be read alongside other figures, DCO plans and related material. Cross-reference is acceptable up to a point, but here it becomes part of the problem. To understand the Scheme, the reader must move between Chapter 4, figure plans, the works	The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme. Chapter 4 provides information on: the Scheme description; a description of the Work Numbers; the Rochdale Envelope approach and the Scheme

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		plan, the layered works PDF, the Draft DCO Schedule 1, and Appendix 4.1. That fragmentation weakens intelligibility. A lawful and fair project description should not require the ordinary reader to reconstruct the real Scheme by assembling multiple plans and appendices, some of which are only fully legible when used in layered PDF form. The cumulative effect is opacity, not clarity. Further, the Works Plan is not reasonably accessible in the manner the applicant itself prescribes. The document states that individual work layers should be viewed by downloading the PDF and opening it in Adobe Acrobat, then using the layered-content tools to toggle specific works on and off. In practice, that functionality is not realistically available to many ordinary residents without access to paid or specialist software. The result is that a core DCO plan can only be properly interrogated by those with the necessary proprietary tools, while affected residents are left with a flattened and far less intelligible version. For a project of this scale and complexity, affecting multiple villages and parishes, that is procedurally unfair. It places a technical and financial barrier in the way of meaningful public understanding and participation, and reinforces the objection that the scheme has not been presented in a clear, accessible and transparent form. It is not possible for communities to understand the sum of all impacts at each specific land parcel, as these are	parameters assessed within the ES; detail on the role and function of each of the Scheme components, supported by images and drawings; Scheme-wide design components such as fencing and security; construction programme; a description of construction activities for each Scheme component; construction staff; construction hours of work; construction traffic and access; temporary construction compounds; and the Construction Environmental Management Plan; and construction plant and machinery. Cross-references are provided to information control documents such as the Works Plan [AS-002 and AS-003] and the Design Principles, Parameters and Commitments [APP-213]. Cross-referencing also assists in maintaining a proportionate ES, in line with EIA best practice. The Applicant refers to its response to BEPS-152 in relation to the accessibility of the Work Plans. The Planning Statement [APP-209] demonstrates national policy

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		spread out in different chapters throughout the application. This means it is also impossible to understand the in-combination effects of these impacts.	compliance and how sustainable development has been achieved through the outcomes of the environmental impact assessment, good design and delivery of economic benefits.
BEPS-159	Chapter 4: Scheme Description	Overall conclusion on Chapter 4 and associated plans Taken together, Chapter 4, Figures 4.2 and 4.3, the Works Plan, Figure 5.1 and Appendix 4.1 do not amount to a sufficiently fixed, coherent and intelligible statement of the Scheme. They show a wide, dispersed, industrial and infrastructure-heavy project in a highly constrained landscape, but still leave important aspects of its physical form, construction interventions, access arrangements and ancillary infrastructure either overly broad, only illustratively defined, or dependent on cross-reference and decoding. The result is that the technical chapters are not grounded on a stable and transparent project description. The Examining Authority should therefore treat the ES with caution wherever conclusions depend on assumptions as to infrastructure scale, construction access, compounds, fencing, CCTV, internal tracks, substation security works, or the exact scope of highway interventions.	The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme. The Applicant refers to its response to BEPS-146 to BEPS-158.
BEPS-160	Chapter 4: Scheme Description	Remedies sought For those reasons, BEPS requests that the Examining Authority and Secretary of State require the applicant to	The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme.

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		provide a substantially clearer and more tightly bounded scheme description, including: a revised and up-to-date mapping suite using a consistent contemporary baseline; plain-English explanations of all coded work areas and highway intervention points; definitive rather than merely illustrative technical information for the principal infrastructure and ancillary works most relevant to environmental effects; a clearer identification of the scale, dimensions and duration of all construction compounds, access arrangements and highway improvement areas; and a parcel-by-parcel, receptor-linked constraints plan showing how specific scheme components interact with specific heritage, ecological, hydrological and community receptors. Site-by-site descriptions of all impacts in that area should be produced so that residents can understand the true impact in their own area and the in-combination effects. In the absence of that material, the Scheme should be treated as insufficiently described for the purposes of robust examination, and consent should be refused.	The Applicant refers to its response to BEPS-146 to BEPS-158.
BEPS-161	Chapter 5: Reasonable Alternatives and Design Evolution	Chapter 5: Reasonable Alternatives and Design Evolution BEPS objects to the application on the basis that Chapter 5 and the supporting Site Selection Assessment do not provide a lawful, robust or transparent assessment of reasonable alternatives. Instead of identifying and comparing genuinely reasonable alternatives in terms of location, scale, layout, technology and environmental effects, the applicant assumes from the outset that a 500MW transmission-connected solar project with	The Applicant considers that the assessment of alternatives undertaken complies with the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the relevant National Policy Statements, and the Planning Inspectorate's EIA Scoping Opinion.

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		associated BESS and major new grid infrastructure must proceed in this broad area, and then narrows the alternatives exercise around that assumption. That is not what the EIA Regulations require. Schedule 4 requires a description of the reasonable alternatives studied and the main reasons for the chosen option, taking account of environmental effects, and the Planning Inspectorate's Scoping Opinion specifically required full details of alternative sites, layouts and generation technologies, including a comparison of environmental effects.	The Applicant draws attention to paragraph 4.3.9 of NPS EN-1, which confirms that from a policy perspective there is no general requirement to consider alternatives or to establish whether a development represents the best option. ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] describes the reasonable alternatives considered by the Applicant, including alternative generation technologies, the Point of Connection and location for the National Grid Substation, solar site selection, and design evolution including the BESS, Cable Route Corridor, Green Infrastructure and access. Further detail is provided within the Site Selection Assessment [APP-215].
BEPS-162	Chapter 5: Reasonable Alternatives and Design Evolution	A central flaw in the applicant's alternatives case is that it was originally built around a point of connection at Norwich Main Substation, but that premise failed. The Site Selection Assessment confirms that the applicant initially considered Norwich Main and identified an initial 20km search radius from that substation as a commercially viable cable distance, but that NGET later advised there was neither	The Applicant has set out in ES Volume 1, Chapter 5 Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215] that once Norwich Main Substation was

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		sufficient capacity at Norwich Main nor any opportunity to expand it to accommodate a 500MW solar project. Norwich Main was therefore “discounted as a viable PoC.” That was not a minor refinement. It removed the original locational rationale for the search area. Once Norwich Main ceased to be a viable point of connection, the applicant should have fundamentally revisited the search area and the concept of the project itself. Instead, it retained sites already assembled under the failed Norwich Main premise and then adapted the connection strategy around them by seeking a wholly new National Grid substation. That is a circular approach to alternatives. It is not a neutral, lawful or environmentally led assessment.	discounted the Applicant continued to discuss available connection points with NGET in Norfolk. NGET confirmed that there was capacity along the Bramford to Norwich 400kV overhead line between Norwich and Diss and a grid connection offer was received. It is noted that Paragraph 4.3.10 of EN-1 requires that <i>‘The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.’</i> NPS EN-1 confirms that, from a policy perspective, there is no general requirement to consider alternatives or to establish whether a development represents the best option; however, paragraph 4.3.15 of EN-1 states that: <i>‘Applicants are obliged to include information about the reasonable alternatives they have studied in their ES. This should include an indication of the main reasons for the applicant’s choice, taking into account the environmental, social and economic</i>

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			<i>effects and including, where relevant, technical and commercial feasibility.'</i> Paragraph 4.3.22 of EN-1 requires that the Secretary of State should give appropriate weight to the consideration of alternatives. However, the consideration of alternatives should be carried out in a proportionate manner. Furthermore, only the alternatives that meet the objectives of the proposed development should be considered. The Applicant has clearly complied with these requirements as set out in ES Volume 1, Chapter 5 Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215].
BEPS-163	Chapter 5: Reasonable Alternatives and Design Evolution	The alternatives exercise was driven by land assembly and willing landowners, not environmental comparison The Site Selection Assessment repeatedly shows that land availability and willing landowners drove the outcome. The applicant says land agents identified large-scale land ownerships with potentially willing landowners, that the applicant preferred as few ownerships as possible to minimise complexity and cost, and that sites were progressed because landowners were willing voluntarily to	As detailed in the Site Selection Assessment [APP-215] and ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], the Applicant has followed a staged approach to site selection, with consideration to a range of planning, environmental and operational factors and the project objectives. Land availability (i.e. the

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		enter agreements. It also says that alternative development zones were not considered reasonable alternatives because the land had not been made available to the applicant. Land availability may be relevant to deliverability, but it is not a substitute for a lawful comparison of environmental effects. The statutory question is not simply which land the applicant has been able to assemble. It is what reasonable alternatives were studied and why the chosen option was selected, taking account of environmental effects. Here, the exercise is materially distorted because the applicant treats 'reasonable alternative' as effectively meaning land already under the applicant's control or capable of being brought under its control. That is far too narrow.	participation, or willingness of landowners) is a key consideration for site selection, as without willing landowners, acquiring land through compulsory acquisition powers would be necessary, which the Applicant is keen to avoid as far as practicable. Stage 2 of the Site Selection Assessment [APP-215] involved the exclusion of various planning, environmental and spatial constraints, including all ALC Grade 1, 2 and 3 land, Flood Zones 2 and 3, nationally designated landscapes (including the Broads National Park), designated international and national ecological and geological sites, ancient woodland, and designated national and local archaeological designations and built heritage assets. Consideration was also given to the proximity of sensitive human receptors, including residential dwellings and populated areas.
BEPS-164	Chapter 5: Reasonable Alternatives and Design Evolution	Horlock/Holford The applicant's reliance on the Horlock and Holford framework strengthens the objection particularly in relation to siting the National Grid substation. Those principles	The Applicant considers that the site selection process for the National Grid Substation has been undertaken in accordance with the Horlock Rules, in a manner consistent with the

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		require substations to be sited and designed so that landform, vegetation and layout reduce visual and wider environmental effects to a reasonably practicable minimum. Yet the applicant has provided no transparent comparative, landscape-led appraisal demonstrating why the exposed Great Moulton plateau is the least harmful available option. Instead, the evidence shows that the search was narrowed by proximity to the 400KV line and A/B roads, and that land availability and willing landowners materially drove the outcome. In those circumstances, Chapter 5 does not show lawful application of the applicant's own cited siting guidance.	requirements of NPS EN-5 and paragraph 2.11.2 of NPS EN-5 which provides that the Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules. The site selection process for the National Grid Substation is set out within Sections 3.3 – 3.5 of the Site Selection Assessment [APP-215]. The Applicant draws attention to paragraph 3.4.6 of the Site Selection Assessment [APP-215], which confirms that following the identification of potential siting zones from desktop analysis of routing options, each siting zone was reviewed against the guidelines within Section III of the Horlock Rules. The siting of new National Grid substations and line entries should, as far as reasonably practicable, seek to avoid internationally and nationally designated areas of the highest amenity, cultural or scientific value through the overall planning of the system connections.

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			Given the importance of the accessibility of the National Grid Substation from the Strategic Road Network and the need for a location in proximity to the Bramford to Norwich 400kV line, the Applicant applied the following guidelines as a starting point to identify potential siting zones for the substation: a 1km search area either side of the existing 400kV overhead line, and a 500m search area either side of a main road (A and B roads) for accessibility. The application of these criteria identified three potential siting zones for the National Grid Substation. Each siting zone was reviewed and RAG-rated against the guidelines within Section III of the Horlock Rules. The Applicant considers that ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215], read together, provide a transparent, comparative environmental appraisal of the alternative siting zones for the

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			National Grid Substation against the Horlock Rules.
BEPS-165	Chapter 5: Reasonable Alternatives and Design Evolution	No evidence that a project of this type or scale is required in South Norfolk or T7 East Anglia The applicant presents need only at an abstract national level. It does not produce evidence that a transmission-connected project of this type or scale is required in South Norfolk at all, or in East Anglia T7 specifically, to meet regional clean-power needs. Ofgem's April 2025 TMO4+ Impact Assessment used a combined transmission and distribution 2035 solar permitted capacity of 3,300MW for T7 East Anglia. That matters because the applicant uses assumed need to exclude 'no development', reduced-scale, and materially different alternatives. Yet there is no project-specific evidence that this particular 500MW scheme in this particular landscape is required to meet regional clean-power needs. The same Ofgem assessment also recorded that in East Anglia, all transmission solar projects with land rights only were estimated to receive Gate 1 rather than Gate 2 offers under the reform analysis. This analysis is significant in terms of BEPS's evidence about IGP/Macquarie lobbying and meeting DESNZ, their call to combine NESO's regional transmission and distribution solar targets to favour transmission solar, the subsequent change to these targets by DESNZ, and East Pye Solar's eventual gate 2 offer. This chain of events gives	The Applicant refers to its response to rows BEPS-002, BEPS-005 and BEPS-010 above. Further, Section 6.3 of the Statement of Need [APP-206] explains that smaller schemes can make a valuable contribution to meeting demand. Paragraph 3.3.12 of NPS EN-1 demonstrates the government's view that smaller schemes are needed alongside, but not instead of, large-scale ground mounted solar schemes. This is because the bulk generation potential of large-scale schemes and their connection to the National Electricity Transmission System (NETS) enables their benefits to be felt more widely.

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		rise to an appearance of bias. In these circumstances, the applicant cannot lawfully justify the rejection of 'no development' and lower-harm alternatives simply by asserting a generic national need for solar.	
BEPS-166	Chapter 5: Reasonable Alternatives and Design Evolution	Unlawful or irrational exclusion of 'no development' and reduced-scale alternatives The applicant's rejection of a 'no development' scenario and reduced-scale alternatives is unsound. In this case, those are plainly material alternatives because the need for this specific project in this specific location is disputed and unsupported by any clear T7-specific justification. Once Norwich Main failed as a viable point of connection, a project in a different region altogether became an obvious alternative requiring proper consideration. The applicant's approach instead assumes that 500MW plus associated BESS and major transmission works is the immutable objective, and then excludes options that do not fit that objective. That is not a genuine alternatives assessment.	In relation to the 'no development' scenario, the Applicant draws attention to paragraph 5.3.2 of ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], which confirms that a 'no development' scenario as an alternative to the Scheme has not been considered further in line with paragraph 4.3.23 of NPS EN-1. This is because 'no development' is not considered to be a reasonable alternative to the Scheme, as it would have no prospect, realistic or otherwise, of delivering the additional electricity generation and energy storage proposed. The overarching need for the Scheme is set out in the Statement of Need [APP-206], which addresses the need for large-scale solar assets. Paragraphs 3.2.1 and 3.2.2 of NPS EN-1 state that the Government's

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			objectives for the energy system are to decarbonise power generation to meet the Clean Power 2030 Mission, ensuring that supply of energy remains secure, reliable, affordable, and consistent with net zero emissions in 2050, and that a range of different types of energy infrastructure is required to deliver these objectives. Paragraph 3.2.8 of NPS EN-1 is clear on the point of need and states that the Secretary of State should assess all applications for development consent for the types of infrastructure covered by the NPS on the basis that the Government has demonstrated that there is a need for those types of infrastructure which is urgent. The Applicant refers to its response to rows BEPS-002.
BEPS-167	Chapter 5: Reasonable Alternatives and Design Evolution	The Great Moulton substation was chosen to serve pre-assembled sites, not shown to be the least harmful strategic solution The Site Selection Assessment shows that the Great Moulton strategy was selected because it was close to the 400kV line, accessible from A and B roads, and importantly, in proximity to the solar sites already identified by the applicant. It also shows that the more southerly	The Site Selection Assessment [APP-215] sets out the considerations for the proposed siting of a new National Grid Substation. Following the confirmation that the Norwich Main Substation was not a viable Point of Connection, the Applicant focused on identifying a site along the Bramford to

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		alternative siting zone near Yaxley was not preferred because it was the furthest from the identified solar sites, so cable routing would entail greater losses and greater environmental impacts than if the substation and solar sites were located in proximity. That reveals the self-referential nature of the exercise. The applicant did not ask, in any neutral way, where a new National Grid substation was most appropriate once Norwich Main had failed. It asked where a new substation could be placed so as best to preserve and serve the sites it had already assembled. That is not an environmentally led alternatives assessment.	Norwich 400kV line between Diss and Norwich that was appropriate and available for a new National Grid Substation.
BEPS-168	Chapter 5: Reasonable Alternatives and Design Evolution	Failure to justify the concentration of major transmission infrastructure at Great Moulton The applicant does not address a central alternatives question raised by the design it now proposes: whether it is necessary or reasonable to concentrate multiple major electrical infrastructure elements in the same locality, including a wholly new National Grid substation, the BESS, major project substations, associated cable corridors and other grid connection works. The Site Selection Assessment itself cites EN-3 paragraph 2.10.17, which says that where applicants choose a site based on nearby available grid export capacity, they should consider the cumulative impacts of situating a solar farm in proximity to other energy-generating stations and infrastructure. Yet neither Chapter 5 nor the SSA performs	The Design Approach Document [APP-212] and paragraph 5.7.38 of ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] confirm that a general location of the BESS Site and co-location of the 400kV Project Substation was identified in order to be in close proximity to the Point of Connection. As set out in the response to earlier representations regarding the BESS Site (BEPS-006), there are efficiencies associated with locating the BESS in proximity to the Point of connection.

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		that exercise in any meaningful way. They compare local siting options, but do not test whether establishing a new transmission hub at Great Moulton is justified at all, nor whether less harmful alternatives exist. That omission is compounded by the fact that Great Moulton would not be an isolated piece of infrastructure in an otherwise unburdened landscape. The Yaxley comparison in the applicant's own SSA underlines that the wider district is already part of a substantial transmission and energy infrastructure receiving environment. The proposed East Pye National Grid substation would sit only about 13 miles from the new National Grid substation at Yaxley, yet the applicant has not assessed whether another major National Grid node in this broader landscape is necessary or environmentally acceptable. The defect is not mileage alone. It is the failure to justify and assess clustered transmission infrastructure in an already constrained region.	It also brings together some of the taller infrastructure of the Scheme with the overhead lines, minimising the spatial distribution of these taller elements as far as practicable across the greater geographical area of the Site. This approach is consistent with paragraph 2.10.17 of NPS EN-3, which states that applicants <i>may choose a site based on nearby available grid export capacity</i> to maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs. In respect of paragraph 2.10.18 of NPS EN-3 which states '<i>Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure</i>', whilst there are no existing energy generating stations at Great Moulton, the cumulative impacts of the different elements of the Scheme to be introduced at Great Moulton (e.g. NG substation, BESS, additional and replacement pylons and 400kV

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			substations) are collectively assessed in the Environmental Statement.
BEPS-169	Chapter 5: Reasonable Alternatives and Design Evolution	Failure to assess the foreseeable Great Moulton grid-hub scenario The applicant presents the Great Moulton National Grid substation as if it were infrastructure required for East Pye alone. The available evidence suggests a broader foreseeable scenario that has not been disclosed or assessed. The objection materials already on the record state that Tasway Energy Park had indicated an intention to connect at or near Great Moulton and that Tasway had been in discussion with East Pye about sharing the proposed connection. They further note that East Pye did not disclose or assess any such shared use in its consultation materials. The objection materials also identify other nearby storage projects, including Field Long Stratton BESS and Wacton BESS, as omitted cumulative schemes	The Applicant confirms that the new National Grid Substation forming part of the Scheme has been designed and sized to serve the Scheme, in accordance with the Grid Connection Agreement between the Applicant and the National Energy System Operator, as set out in the Grid Connection Statement [APP-207]. The Grid Connection Agreement provides for a Transmission Entry Capacity of 500MW export to and 500MW import from the NETS, and does not include or otherwise provide for any shared use of the connection point by other developers. The Applicant is not able to comment on private commercial matters relating to any third party developer's connection

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		sharing grid, transport and environmental receptors with East Pye. If Great Moulton is, as the available evidence indicates, a reasonably foreseeable shared connection area or emerging grid hub for multiple projects, then the applicant has materially understated the true purpose, scale and likely effects of the infrastructure being promoted. The alternatives assessment is then misframed because it assesses the siting of a nominal East Pye-only connection asset rather than the cumulative effects of creating a new multi-project transmission node in this location. The applicant cannot have it both ways. If nearby schemes are sufficiently foreseeable to be seeking or discussing use of the same broad connection area, they had to be assessed cumulatively. If they are too speculative to assess, they cannot be relied on, directly or indirectly, to normalise or justify the Great Moulton hub strategy.	intentions, and any such shared connection arrangement, if it were to arise, would be a matter for the National Energy System Operator, National Grid Electricity Transmission and the relevant developer(s) to progress through the ordinary connection application processes. Any planning applications in proximity to the Order Limits would be required to cumulatively assess environmental impacts with the Scheme, should it be consented.
BEPS-170	Chapter 5: Reasonable Alternatives and Design Evolution	Battery oversupply and the weakness of any speculative BESS-led justification This point is sharpened by NESO's current evidence on batteries. NESO's December 2025 reform update said projects not required by 2030 or 2035 would receive Gate 1 rather than Gate 2 and would only be considered for future progression if later criteria were met. NESO's March 2026 connections methodologies consultation then reported a significant battery oversupply at Great Britain level: 83.2GW of batteries had Gate 2 status and 90.6GW	The Applicant refers to its response to BEPS-002, BEPS-005 and BEPS-175.

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		were built, operational or Gate 2, compared with a CP2030 Action Plan 2035 battery capacity of 24–29GW. NESO said that, given that oversupply, only batteries that are ready and that meet specified protection clauses were likely to meet the Gate 2 criteria in the next application window. That shows that speculative nearby BESS projects, including East Pye Solar's own, cannot simply be assumed to justify the creation of a new National Grid hub at Great Moulton. If East Pye, Tasway, Field and Wacton are all being treated informally as possible users of the same connection area, that only reinforces the need for a clear and lawful cumulative and alternatives assessment. It does not excuse its absence.	
BEPS-171	Chapter 5: Reasonable Alternatives and Design Evolution	Failure properly to avoid Best and Most Versatile agricultural land The applicant's agricultural land methodology is also internally inconsistent and weak. At Stage 2 the applicant says it excluded all ALC Grades 1, 2 and 3 from the search area. But because that did not produce enough land, it then reintroduced Grade 3 land and ultimately produced a scheme which, on the applicant's own detailed survey, contains 829.1 hectares of BMV land, amounting to around 80% of the sites (not including Cable Corridors or haul roads). That is not a convincing demonstration that poorer quality land was preferred where possible. It shows instead that the methodology initially recognised the policy constraint	The Stage 2 exclusion of ALC Grades 1, 2 and 3 was undertaken using Natural England's 1970s Provisional ALC mapping, which does not differentiate between Grades 3a and 3b. As the Order Limits and wider search area are predominantly shown as undifferentiated Grade 3 on that mapping, the initial application of the exclusion criterion did not identify sufficient available land to accommodate a scheme of the required scale. This position is

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		but then relaxed it to preserve the chosen scheme. Given the scale of BMV involvement, the applicant was required to show much more convincingly that less harmful alternatives did not exist. It has not done so.	consistent with paragraph 2.10.23 of NPS EN-3, which recognises that at the scale of NSIP solar development it is likely that some agricultural land will be used, and paragraph 2.10.21, which establishes that ALC should not be a predominating factor in determining site suitability. The proportion of agricultural land of BMV quality in the wider area is estimated in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. Since the ES was published a Predictive Agricultural Land Classification Map for England has been published (Defra, 2026). This predicts that most of Norfolk is of BMV quality. The subsequent detailed ALC survey, reported in ES Volume 3, Appendix 15.1 – Agricultural Land Classification Survey [APP-181], confirmed that BMV quality land within the Sites amounts to 829.1 ha.

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			As noted in the Site Selection Assessment [APP-215] , it is highly likely that any alternative sites considered within the 20km search area would have similar levels of BMV land if subject to detailed ALC surveys. Following completion of the detailed ALC surveys, BMV quality land was a consideration in the design evolution of the Scheme, as described in the Design Approach Document [APP-212] . This included the removal of Sub-Site 3A entirely from the Order Limits (largely Grade 2 BMV land), the removal of solar infrastructure from Site 6 (18 ha of Grade 2 BMV land), the removal of Solar PV Arrays from Sub-Site 10D (Grade 3a BMV land), and the removal of pockets of BMV quality land from the Solar PV Arrays within Site 3, Sub-Site 5B, Site 6 and Sub-Site 8A.
BEPS-172	Chapter 5: Reasonable Alternatives and Design Evolution	Brownfield, rooftop and alternative-location analysis is superficial The applicant dismisses brownfield and rooftop alternatives largely because no individual sites or combinations near	The Site Selection Assessment [APP-215] and ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] set out

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		the chosen point of connection were sufficient to accommodate a 500MW utility-scale scheme and because multiple ownerships would render the scheme unviable. That again assumes the answer. The relevant question is not whether brownfield or rooftop sites can accommodate East Pye exactly as conceived, but whether lower-harm alternatives, possibly in different combinations, locations or scales, or on the distribution network serving local needs, were genuinely considered. The applicant's approach remains scheme-preserving rather than alternatives-led. Likewise, the wider location exercise is unduly narrow. East Pye is promoted by a national developer with multiple projects elsewhere, yet Chapter 5 and the SSA do not show why this specific project in South Norfolk is required or preferable to other less harmful opportunities elsewhere within the developer's broader portfolio or in other regions. The exercise remains too local, too constrained by land already assembled, and too dependent on preserving a project concept that lost its original connection rationale.	that the Applicant undertook a review of the brownfield registers prepared by South Norfolk and Broadland District Council, Breckland Council, Mid Suffolk District Council and East Suffolk Council within a 20km search area from both the initial Norwich Main Substation and from the confirmed Point of Connection. Consideration was also given to commercial rooftops within the search area. No previously developed sites, and no commercial rooftops or combined premises, were identified that covered a sufficient area to accommodate a utility-scale solar project, whether individually or in combination. The Applicant draws attention to the fact that achieving this capacity through such alternatives would require securing agreements with a large number of separate land ownerships over an extensive geographic area, which — in accordance with paragraph 4.3.27 of NPS EN-1 — would render the alternative not physically suitable or not commercially viable, and therefore

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			capable of being excluded from further consideration. The Applicant has secured a Grid Connection Agreement for 500MW export capacity through a new National Grid Substation connecting into the Bramford to Norwich 400kV overhead line, as set out in the Grid Connection Statement [APP-207]. As is standard practice for solar NSIP development, the site selection process was undertaken with reference to that specific grid connection point. Paragraph 2.2.1 of NPS EN-5 recognises that the initiating and terminating points of new electricity networks infrastructure are not substantially within the control of the applicant. The consideration of alternative locations elsewhere within the developer's wider portfolio, or in other regions, is not required by national policy for the assessment of this Application. Each solar NSIP promoted by the Applicant proceeds on the basis of its own grid connection offer, willing landowner participation, and site-

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			specific environmental and planning considerations, and is assessed on its own merits against the relevant National Policy Statements. Consideration of alternatives on such a portfolio-wide or inter-regional basis would not, in the Applicant's view, constitute the consideration of a 'reasonable alternative' within the meaning of the EIA Regulations or NPS EN-1.
BEPS-173	Chapter 5: Reasonable Alternatives and Design Evolution	Conflict with the applicant's own cited Holford and Horlock principles The applicant relies on the Horlock Rules and cites the Holford Rules. Those rules include the principle that, where country is flat and sparsely planted, high-voltage lines should as far as possible be kept independent so as to avoid concentration of lines or 'wirescape'. That sits uneasily with the strategy pursued here, which concentrates a new National Grid substation, BESS and major project substations in a flat, open rural area already sensitive in terms of landscape, heritage, ecology, hydrology, aviation and residential amenity. The applicant cannot invoke those principles while in substance promoting the very concentration of transmission infrastructure they are intended to minimise.	Section III of the Horlock Rules addresses the amenity issues associated with the siting and design of new substations. The Applicant draws attention to the fact that Rule 6 of the Holford Rules (which concerns the avoidance of concentrations of high-voltage lines with smaller lines, converging routes, distribution poles and other masts, wires and cables in flat and sparsely-planted country) is a guideline relating to the routeing of new high-voltage overhead lines. The Applicant has followed the Holford Rules in relation to the limited

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			overhead line works associated with the Scheme, which comprise the diversion of the existing Bramford to Norwich 400kV overhead line into the new National Grid Substation. By selecting a Point of Connection in proximity to the existing overhead line, the Applicant has sought to limit the extent of overhead line diversion, thereby reducing the potential for new wirescape effects and the introduction of new lines into the wider landscape, in accordance with the objectives of the Holford Rules and Paragraph 2.9.17 of NPS EN-5. The National Grid Substation site selection has been undertaken in accordance with the Horlock Rules, as described in Section 3 of the Site Selection Assessment [APP-215]. The Applicant has considered environmental issues from the earliest stage in accordance with the Horlock Rules, and has sought to avoid internationally and nationally designated areas of the highest amenity, cultural or scientific value; to

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			protect areas of local amenity value, important existing habitats and landscape features; to take advantage of the screening provided by land form and existing features; to keep the visual, noise and other environmental effects to a reasonably practicable minimum; and to consider the land use effects of the proposal.
BEPS-174	Chapter 5: Reasonable Alternatives and Design Evolution Grid Connection Statement	Grid Connection Statement (APP/7.12): technical feasibility is not proof of need, and the document exposes continuing uncertainty in deliverability, design and BESS reliance The Grid Connection Statement does not establish any independent planning need for East Pye Solar. What it establishes is much narrower: that the applicant is in the confirmed queue to obtain a connection offer, to make a Bilateral Connection Agreement, and can therefore say that a connection at the proposed point of connection is technically feasible. The document itself says that acceptance of the connection offer 'demonstrates that a connection at the PoC is technically feasible'. That is not the same thing as demonstrating that the project is needed in policy terms, needed in this location, or needed despite its very substantial environmental, heritage, landscape, agricultural and community impacts. A grid offer is an	The Applicant notes this comment. The Statement of Need [APP-206] describes how and why the Scheme addresses all relevant aspects of government policy which support the rapid deployment of low carbon electricity generation at scale. The suite of National Policy Statements (NPSs) for energy confirm that substantial weight should be given to the need for low carbon generation schemes to which the NPSs are of relevance, such as the Scheme. The policy and planning balance for the Scheme is set out in the Planning Statement [APP-209] , which provides an appraisal of the Scheme against the relevant policy and legislative

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		engineering and contractual matter; it is not proof that the scheme is justified in the planning balance. The statement then attempts to go further than the evidence warrants by asserting that the scheme is 'appropriate to support the Government's plans to deliver a clean energy system' because, through the Connections Reform process, the solar component has secured Gate 2 and the BESS has secured Gate 1 prioritisation. That proposition should be given little weight. Gate status is not a freestanding planning need case. It is not an assessment of environmental acceptability, not an assessment of proportionality, and not a conclusion that this particular scheme is required in this particular place. The statement's own wording shows the distinction: it first says the grid offer demonstrates technical feasibility, and then separately makes a policy assertion about appropriateness. The latter does not follow from the former.	framework, drawing on the conclusions of the ES and other DCO Application documentation to assess whether the Scheme complies with planning policy, and Policy Compliance Document [APP-210], which provides analysis of the Scheme's compliance with planning policies regarding design. Please refer to the Applicant's response to BEPS-175.
BEPS-175	Chapter 5: Reasonable Alternatives and Design Evolution Grid Connection Statement	Indeed, the most significant point in APP/7.12 is that it reveals a material difference in certainty between the solar and storage elements of the scheme. The statement expressly confirms that the solar component has secured Gate 2, but that the BESS element has secured only Gate 1 prioritisation. The applicant is seeking consent for a very substantial BESS and relies on storage as part of the scheme's operational case and wider claimed public benefits, yet its own grid document shows that the storage element lacks the same connection certainty as the solar generation element. That weakens the weight that can	The Applicant notes this comment. Evidence for the need for the Scheme is set out in the Statement of Need [APP-206]. The policy and planning balance for the Scheme is set out in the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. The Applicant notes that solar and storage schemes, both separately and

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		properly be given to the BESS in the planning balance and strengthens the objection that the scheme's claimed benefits are being overstated relative to what is actually demonstrated as deliverable. The statement is also notable for what it says about continuing design uncertainty. It records that discussions with National Grid Electricity Transmission are still ongoing regarding the configuration and layout of the new National Grid Substation and the reconfiguration of the overhead transmission line. It further says that, although the Works Plan reflects recent engagement, the illustrative material submitted with the application, including the Indicative Masterplan and the engineering drawings, will be revised as micro-siting and orientation of the new National Grid Substation continue to be discussed. This is not a minor drafting point. The new National Grid substation and associated overhead line works are central parts of the project's most sensitive infrastructure. If the detailed configuration, micro-siting and orientation remain under discussion at application stage, then the fixed basis for assessing effects on nearby residents, ecology, landscape character, heritage setting, aviation, hydrology, groundwater pathways and cumulative infrastructure burden is correspondingly weakened. This is especially important because the statement seeks to present the grid connection infrastructure as part of a single, holistic application under NPS EN-1. The document cites paragraph 4.11.7 of EN-1 and says the grid	co-located, are supported in national policy. For example: • NPS EN-1, paragraph 3.2.8 – the government has demonstrated that there is an urgent need for low-carbon Infrastructure • NPS EN-1, paragraph 3.3.23 – a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar • NPS EN-3, paragraph 2.10.2 – Solar energy is at the heart of the government's Clean Power Mission • NPS EN-1, paragraph 3.3.5 – the need for increased flexibility of providing new storage and interconnectors. • NPS EN-1, paragraph 3.3.25 – storage has a key role to play in achieving net zero when

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		connection forms part of the scheme and is being brought forward in a single DCO application. That approach only assists the applicant if the integrated project is itself sufficiently fixed and assessable. Here, however, the statement simultaneously says that key parts of the National Grid substation arrangement remain under discussion and that supporting illustrative documents will be revised as those discussions continue. The applicant cannot claim the benefit of a single, coordinated application while still leaving material aspects of the most sensitive grid infrastructure in flux. The statement shows the applicant is not merely relying on the minimum grid intervention necessary to establish a connection. It says that a connection can be achieved through a minimum of one overhead transmission circuit, but that the applicant has 'proactively assessed and included the option to divert and connect both existing overhead transmission lines, enabling either a single or double turn in to the substation,' and that the applicant's preference is the 'double turn in option.' That is a striking admission. If one circuit is sufficient to achieve connection, the inclusion and apparent preference for a broader, more intensive overhead-line solution requires close scrutiny. It raises obvious questions of engineering necessity, proportionality, visual and landscape burden, aviation implications, land-take, and cumulative infrastructure intensity. The examination should test why the more extensive option has been included and preferred, and	providing flexibility to the energy systems. NPS EN-1, paragraph 3.3.26 – storage is needed to reduce the cost of the electricity system and increase reliability by storing surplus electricity As set out in the Grid Connection Statement [APP-207], the Applicant confirms that it has received notification of a Gate Two, Phase One offer for the solar element of the Scheme. Whilst a Gate One notification has been received for the BESS element, it is fully anticipated that, should the Scheme receive consent, co-located technologies will be prioritised and the Gate offer for the BESS would be upgraded or improved. The Applicant notes that further rounds of notifications are anticipated, which are expected to reflect advances in project timelines across the network. The Applicant clarifies that Gate offers are only granted to parties that have secured a grid connection with National Grid, as set out in the Grid

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		whether that preference is justified when measured against the scheme's very substantial impacts.	Connection Statement [APP-207]. The Applicant therefore has a secured connection for both elements of the Scheme. In relation to design certainty, the Applicant draws attention to the Design Principles, Parameters and Commitments [APP-213], which sets out the maximum and, where necessary, minimum parameters with the spatial extents shown on the Works Plan [AS-002] and [AS-003]. The Environmental Impact Assessment has been undertaken in accordance with the Rochdale Envelope approach, as set out in ES Volume 1, Chapter 2 – EIA Methodology [APP-038], to assess the reasonable worst-case scenario for the likely significant environmental effects of the Scheme. Requirement 5 of the Draft DCO [AS-032] requires details of the detailed design to be submitted to and approved by the relevant planning authority in accordance with the Design Principles, Parameters and Commitments [APP-213].

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BEPS-176	Chapter 5: Reasonable Alternatives and Design Evolution Grid Connection Statement	The statement also shows that land rights for the grid connection are not yet secured. For the Cable Route Corridor, all freehold owners and tenants have been contacted, an indicative corridor has been discussed, and heads of terms have been issued, but negotiations are continuing. For the National Grid substation and overhead transmission works, the applicant says it is pursuing voluntary agreements but will also be seeking compulsory acquisition and temporary use powers through the DCO. It then states that by the time construction starts, it will have obtained the necessary land rights either by voluntary agreement or through compulsory acquisition and temporary possession powers. Again, that is not proof of present deliverability; it is an assertion that the missing ingredients will be obtained later. In a scheme already dependent on extensive grid works, very substantial cable routing, multiple substations and highly contentious compulsory powers, that is not a neutral point. It reinforces the wider concern that the project's deliverability is being assumed rather than demonstrated. The statement should therefore be read as assisting the applicant only on one narrow point: that there is a grid offer and that a connection is technically feasible in principle. Beyond that, it confirms that the BESS element remains materially less certain than the solar element because it has only Gate 1 prioritisation and no confirmed indicative connection date. It confirms that the detailed National Grid substation layout and associated overhead line	The Applicant is seeking to acquire the rights necessary for the grid connection elements of the Scheme by voluntary agreement where possible. In order to ensure that the Scheme is deliverable, compulsory acquisition powers are also being sought in parallel. This approach is typical for nationally significant infrastructure projects. The Statement of Reasons [APP-020] sets out how this approach complies with the Planning Act 2008 and the Department for Communities and Local Government Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land (2013). Please refer to the Applicant's response to BEPS-175 in relation to the comments raised on the grid connection. Please refer to Applicant's Response to BEPS-002 and BEPS-005 in relation

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		reconfiguration remain under discussion with NGET. It confirms that the applicant is seeking consent for a potentially more extensive 'double turn in' arrangement even though one circuit is the minimum required. And it confirms that essential land rights for the grid connection are still unresolved and may have to be obtained through compulsory acquisition. For those reasons, APP/7.12 should not be treated as evidence of national or regional need, nor as resolving the deliverability concerns surrounding the scheme. At most, it demonstrates a technically feasible route to connection. It does not answer the core planning question of whether East Pye Solar is needed, justified, proportionate, fixed in design, or sufficiently deliverable to outweigh the very substantial harms identified elsewhere in this representation. On the contrary, the document materially supports the objection that the applicant's case on need and deliverability is overstated, especially in relation to the BESS and the scale of the proposed grid infrastructure.	to the role the Scheme would play in meeting regional energy demand. Evidence for the need for the Scheme is set out in the Statement of Need [APP-206]. The policy and planning balance for the Scheme is set out in the Planning Statement [APP-209] and Policy Compliance Document [APP-210].
BEPS-177	Chapter 5: Reasonable Alternatives and Design Evolution	Conclusion Taken together, these defects show that Chapter 5 and the SSA do not amount to a lawful or robust assessment of reasonable alternatives. The applicant began from a false premise, namely the viability of Norwich Main. When that premise failed, it did	The points raised in this section of the relevant representation regarding a revised alternatives assessment are addressed in the following responses: 1. Please see BEPS-161, BEPS-162 and BEPS-167.

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		not restart the exercise but re-engineered the scheme around a new Great Moulton substation designed to preserve sites already assembled through willing-landowner enquiries. It has provided no evidence that a project of this type or scale is required in South Norfolk or T7 East Anglia to meet regional clean-power needs. Indeed it has admitted it is not required in this region. It has not justified the rejection of 'no development', alternative region, reduced-scale or materially different alternatives. It has not shown that the Great Moulton substation strategy is the least harmful strategic option. It has failed to assess the foreseeable cumulative and shared-hub implications of establishing a new major connection node at Great Moulton. It has not convincingly demonstrated avoidance of BMV land. And it has treated brownfield, rooftop and alternative-location options only superficially and on terms designed to preserve the preferred scheme. In substance, the applicant has not shown that East Pye Solar, in this location and in this form, is the least harmful or most reasonable option. It has shown only that, having assembled a particular land portfolio and lost its original connection premise, it has adapted the project so that it can still proceed.	2. Please see BEPS-166. 3. Please see BEPS-165. 4. Please see BEPS-169. 5. Please see BEPS-171, BEPS-173 and BEPS-164.
BEPS-178	Chapter 5: Reasonable Alternatives and Design Evolution	Remedies sought BEPS requests that the Examining Authority and Secretary of State give substantial weight against the application on the basis that the reasonable alternatives case is materially	The points raised in this section of the relevant representation regarding a revised alternatives assessment are

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		deficient. In particular, we ask that the applicant be required to produce a revised and lawful alternatives assessment that: first, reassesses site selection on the basis of the actual point of connection rather than the failed Norwich Main premise; second, evaluates 'no development', reduced-scale and materially different alternatives properly; third, addresses whether a project of this type and scale is actually required in South Norfolk or T7 East Anglia; fourth, assesses the cumulative and foreseeable shared-grid-hub implications of the Great Moulton National Grid substation strategy, including nearby solar and BESS schemes; and fifth, re-examines less harmful alternatives in relation to BMV land, transmission infrastructure concentration, landscape, heritage, ecology and hydrology. If that is not done, the application should be refused.	addressed in the following Applicant Responses: 1. Please see BEPS-161, BEPS-162 and BEPS-167. 2. Please see BEPS-166. 3. Please see BEPS-165. 4. Please see BEPS-169. 5. Please see BEPS-171, BEPS-173 and BEPS-164.
BEPS-179	Climate Change	Chapter 6 – Climate Change Introduction East Pye Solar's climate change case does not provide a reliable basis for concluding that the Scheme is climate-resilient, that its claimed climate benefit is robust, or that it would not worsen climate-related risks for the receiving environment. Chapter 6 now includes lifecycle greenhouse gas assessment, a climate risk and resilience section, and a high-level in-combination summary, but that does not resolve the underlying defects. The chapter remains methodologically narrow and heavily assumption-led. It	ES: Chapter 6 Climate Change [APP-042] provides a comprehensive assessment following IEMA guidance. Climate Resilience: Section 6.9.140 onwards presents a detailed Climate Change Resilience Assessment using UKCP18 projections to 2080s under RCP 8.5. Site-specific risks including flooding, heatwaves, drought, and extreme weather are addressed through embedded design measures. Tables 6.36, 6.37 and 6.38 summarise

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		treats climate change largely as a favourable accounting exercise while fragmenting key adaptation, hydrological, water-resource, soil, biodiversity and cumulative issues into other chapters and management plans. The result is not a coherent, site-specific climate assessment for a 60-year solar, BESS and substation scheme across a large, water-stressed and hydrologically sensitive rural area. The Planning Inspectorate did not require only a high-level climate narrative. It required the ES to explain how the development had been designed to be resilient to climate change risks and did not agree that cumulative climate effects could be scoped out, requiring consideration of changes in flood flows and cumulative GHG emissions or savings. The chapter's response to those requirements remains incomplete.	how each identified climate risk is mitigated across construction, operation and decommissioning phases. Robust Climate Benefits: The GHG assessment (Section 6.9) uses DESNZ grid projections, independently verified solar yields, and EPD-certified embodied carbon values. The lifecycle carbon intensity of 39.67 gCO₂e/kWh falls within typical ranges for solar PV (Table 6.32) and substantially below fossil fuel alternatives. The Scheme delivers net savings of 1,294,630 tCO₂e compared to 2031 grid baseline (Section 6.9.117), demonstrating robustness despite conservative assumptions including BESS replacement embodied carbon. Local climate effects: It is noted that ES Volume 1, Chapter 6 - Climate Change [APP-042] signposts in Table 6.1 the reference to ES: Appendix 9.1 Flood Risk Assessment & Outline Surface Water Strategy [AS-018] which provides detail of any changes in flood flows as a result of climate

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			change with consideration to other development. Cumulative Assessment: Section 6.12 assesses cumulative GHG effects against Carbon Budgets (the legally binding cumulative framework per IEMA guidance). Construction emissions represent 0.54% of relevant electricity sector budgets (Table 6.31). Climate change is systematically integrated throughout the ES following Planning Inspectorate Advice Note 18.
BEPS-180	Climate Change	Structural inadequacy of the climate assessment A lawful climate assessment for a project of this scale should address both principal limbs of climate change assessment: first, the project's own greenhouse-gas implications across its whole life; and second, the vulnerability of the project, surrounding communities, land, water environment, agriculture and ecosystems to present and future climate conditions. The ES states that it includes lifecycle GHG assessment, climate risk and resilience, and an ICCI summary. But in substance the chapter still narrows climate change to a scheme-centred exercise. The chapter treats the resilience receptor as effectively the Scheme itself, and its cumulative GHG logic rests on the global atmosphere being the receptor. That framing avoids	The Applicant respectfully disagrees that ES Volume 1, Chapter 6: Climate Change [APP-042] fails to provide a reliable basis for assessing the Scheme's climate impacts and resilience. The assessment addresses both principal limbs of climate change assessment required by NPS EN-1: the project's GHG implications across its lifecycle, and the vulnerability of the Scheme and receiving environment to present and future climate conditions.

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		the real question: whether this particular development, in this particular place, over 60 years, worsens local climate-related risks and whether its claimed climate benefit survives proper scrutiny once all burdens and uncertainties are included.	In ES Volume 1, Chapter 6 - Climate Change [APP-042] the Applicant assesses the Scheme's cumulative GHG emissions over its 60-year lifespan, utilising Carbon Budgets as the contextualisation framework, considered inherently cumulative. In addition, the Applicant outlines in Section 6.5.11 that the Study Area is the global climate in accordance with the latest ISEP guidance (i.e. the global atmosphere is the receptor). The chapter contains a lifecycle assessment covering construction, operation and maintenance, and decommissioning phases. The assessment considers GHG emissions inclusive of transport emissions and embodied carbon calculations for key components like solar PV arrays, Battery Energy Storage System (BESS), transformers, inverters and cables, explicitly addressing the concern about environmental impacts. Section 6.9.68 identifies that the Scheme will not contribute to equal to or more than 0.05% of the 5th carbon budget and less than 1% each year of

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			the total electricity supply sector budget. ES Volume 1, Chapter 6 - Climate Change [APP-042] also compares the Scheme to alternate energy generating methods, and the Scheme is less emitting than non-renewable sources over the course of its 60-year lifetime and is typical of GHG emissions from Solar energy generation (see Section 6.9.124). Therefore, the project's GHG impacts are fully consistent with applicable existing and emerging policy requirements, and good practice design standards, noting that construction GHG emissions are identified to have Minor Adverse effect on the climate, inclusive of the designated Study Area, and overall considered Not Significant nor considered to worsen local climate related risks. The Applicant signposts in Table 6.11 reference to ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] ES Chapter 9: Water Environment [APP-045], ES Chapter 11: Transport and Access [APP-

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			047], ES Chapter 14: Socio-economics [APP-050], ES Chapter 15: Soils and Agriculture [APP-051] and ES Chapter 16: Ground Conditions [APP-052] of which designated chapters consider and provide assessment of the Scheme with surrounding communities, land, water environment, agriculture and ecosystems.
BEPS-181	Climate Change	Failure to demonstrate climate resilience in the receiving environment PINS accepted scoping out a standalone CCRA only on the basis that the ES should explain how the proposed development had been designed to be resilient to climate change risks, and expressly drew attention to Natural England's comments about how the development may exacerbate climate change impacts to the natural environment. The chapter's resilience response is weak. Its mitigation relies mainly on elevated equipment, outline management plans, weather monitoring, water expected to be stored on site for fire suppression, and generic measures in the outline OEMP. It then concludes that no significant climate change risks have been identified during construction, operation or decommissioning. That is not a robust	In ES Volume 1, Chapter 6 - Climate Change [APP-042] the Applicant notes that PINS agreed to scope out a CCRA (see Table 6.1, ID 3.19.2) acknowledging that climate hazards will be managed through the CEMP during construction with mitigation through embedded infrastructure design and relevant health and safety practices enforced. This was conditional on the ES explaining how the Scheme has been designed to be resilient to climate change risks, with particular attention to Natural England's concerns about potential exacerbation of climate impacts on the natural environment.

ID	Theme	Representation	Applicant's Response
		demonstration of resilience for a 60-year scheme in an area already affected by water stress, flood sensitivity and cumulative infrastructure pressure. It is largely a schedule of generic management responses. There is also no proper integrated assessment of whether the Scheme would worsen climate-related risks for adjacent farmland, habitats, watercourses and communities. The climate chapter should not have treated that as peripheral.	Notwithstanding this, ES Volume 1, Chapter 6 - Climate Change [APP-042] includes a CCRA (Sections 6.9.140 onwards) using UKCP18 projections to the 2080s under the precautionary RCP 8.5 scenario. This assessment systematically addresses site-specific climate risks including flooding, heatwaves, drought, and extreme weather events across all project phases. Supporting this is ES Volume 1, Chapter 4 - The Scheme [APP-040] which incorporates the CCRA, thus outlining how the Scheme has been designed to be resilient to climate change. Tables 6.36, 6.37, and 6.38 provide detailed matrices summarising each identified climate risk, embedded design measures addressing it, residual risk levels, and cross-references to relevant ES chapters and management plans across construction, operation, and decommissioning phases. This demonstrates a coherent, site-specific approach to climate resilience

ID	Theme	Representation	Applicant's Response
			integrated throughout the Scheme design. ES Volume 1, Chapter 6 - Climate Change [APP-042] considers Natural England responses relative to climate change resilience and these are addressed in Table 6.1 with Section 6.9.140 onwards and Section 6.12.3 onwards discussing climate resilience and sensitive habitats and climate change respectively. The Applicant notes that PINS confirmed climate change adaptation to be scoped out (see Table 6.1, Section 12.8.13 and Table 12.3 of the ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]). However, a full assessment has been provided to outline a high-level overview of in-combination effects with regards to alternate disciplines (see Sections 6.9.140 onwards). As such Natural England's comments have been considered and responded to. The Applicant signposts in Table 6.11 reference to ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] Chapter 9 - Water Environment

ID	Theme	Representation	Applicant's Response
			[APP-045], Chapter 11 - Transport and Access [APP-047], Chapter 14 - Socio-economics [APP-050], Chapter 15 - Soils and Agriculture [APP-051] and Chapter 16 -Ground Conditions [APP-052] of which designated chapters consider and provide assessment of the Scheme with surrounding communities, land, water environment, agriculture and ecosystems.
BEPS-182	Climate Change	Failure to assess whether the Scheme itself would worsen local climate-related risks The chapter does not provide quantified or site-specific modelling of how extensive panel coverage, substations, BESS infrastructure, compounds, access tracks and other hard or compacted surfaces may alter runoff pathways, intensify localised flooding, reduce infiltration, alter groundwater recharge, or worsen climate-related water hazards under more intense rainfall scenarios. Norfolk's LLFA repeatedly recorded concerns that the development would increase impermeable area, that compacted gravel and track construction may behave effectively as impermeable surfaces, that greenfield runoff rates may not be achievable directly into access tracks, and that further information was required to demonstrate no increase in flood risk. The scoping material also	In ES Volume 1, Chapter 6 Climate Change [APP-042] the Applicant signposts in Table 6.11 reference to ES Volume 1, Chapter 9 - Water Environment [APP-045], ES Volume 1, Chapter 11 -Transport and Access [APP-047], ES Volume 1, Chapter 15 - Soils and Agriculture [APP-051] and ES Volume 1, Chapter 16 - Ground Conditions [APP-052] of which designated chapters consider and provide assessment of the Scheme with regards to surrounding land, ground conditions such as compacted surfaces and water environment. Further assessment of

ID	Theme	Representation	Applicant's Response
		recorded that there was incomplete consideration of surface water runoff during construction and operation, and that outline drainage design would be required for both phases. Against that background, Chapter 6's climate-risk tables are plainly too high-level. The chapter cannot simply assume that an outline OEMP and later drainage work answer the climate question. The issue is whether the Scheme itself could exacerbate flood and runoff risks in a future of wetter winters, heavier downpours and more volatile rainfall patterns.	potentially amended runoff pathways, possible intensification of localised flooding and reduced infiltration, as well as groundwater recharge beyond ES Volume 1, Chapter 9 - Water Environment [APP-45] are also considered in ES Volume 1, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018]. It is acknowledged that the Scheme's operational measures relating to drainage and surface water management are also set out within the Outline OEMP [APP-197]
BEPS-183	Climate Change	Water vulnerability and water-resource resilience are central, not peripheral Water vulnerability is one of the strongest climate objections. The Scheme is in an area of water stress. The scoping material records that Anglian Water is subject to licence reductions and that its WRMP24 position is that it may not be able to supply all new non-domestic demands until new strategic supplies are developed. It also records that a Water Resources Assessment should be completed because the source of water for dust suppression,	In ES Volume 1, Chapter 6 -Climate Change [APP-044] the Applicant provides a quantified value for operational water demand over the Scheme lifespan that is considered a typical figure having been derived from a standardised approach. Therefore, the Scheme's operational water demand is not dissimilar from

ID	Theme	Representation	Applicant's Response
		bentonite clay mixing for HDD and machinery wash-down had not been identified. Yet Chapter 6 quantifies operational water demand at 309,196 m³ over the project life, including cleaning, equipment, drinking water, product replacement and fire suppression, without establishing within the climate assessment how that water is secured, how resilient that supply is under drought and scarcity conditions, or what the consequences are if mains supply is constrained. That is a basic flaw. Climate resilience in East Anglia cannot be assessed in the abstract while leaving the Scheme's water supply uncertain. Water stress is not merely part of the background baseline; it is a core constraint on deliverability, adaptation and environmental sustainability.	alternatives proposed and is comparable with other solar NSIP. Furthermore, in Table 6.1 and Section 6.8.8 onwards the Applicant refers to ES Volume 1, Chapter 9 - Water Environment [APP-045] and ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] in which provide further details in relation to water resources and resilience of water supply relative to environmental scenarios (e.g. drought, source scarcity, mains supply issues). The Applicant notes the concerns about water scarcity in the area and also the impact of climate change. The Applicant has carried out a ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164] with tankering identified as the preferred method of supply for potable water. Rainwater harvesting and on-site storage have been identified as preferred option for supply of non-potable water.

ID	Theme	Representation	Applicant's Response
			The Applicant notes AWS's current position on new unplanned non-domestic water requests. This is in place by Anglian Water to protect domestic water supplies. The Applicant 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.
BEPS-184	Climate Change	The climate case is overly dependent on the BESS The chapter's operational GHG table shows that BESS replacement is by far the dominant source of operational emissions: 1,034,103 tCO₂e, or 93.59% of total operational emissions. The chapter also assumes a BESS capacity of 2,000 MWh and says it could deliver substantial additional carbon savings, while acknowledging that the exact nature of the emissions used to charge it has not been fully assessed. That creates a major methodological weakness. The chapter relies on the BESS when discussing wider climate-system benefit, yet the BESS also dominates lifecycle emissions and its charging emissions are not fully	A BESS is proposed as associated development to the main Solar PV Sites and will support their operation. The benefits arising from the BESS are set out in Sections 5.11, 6.9, and 6.10 of the Statement of Need [APP-206]. Paragraph 6.9.3 of the Statement of Need [APP-206] explains that "Solar schemes may be developed as standalone schemes or may be co-located with storage or other generation technologies. Both standalone and co-located schemes will play essential roles in contributing to the three pillars of energy policy:

ID	Theme	Representation	Applicant's Response
		assessed. This is already enough to make the climate case assumption-heavy. It is weaker still because the climate chapter does not test a no-BESS scenario. The Scheme's climate case should be assessed both with the BESS and without it. If the BESS is delayed, reduced, omitted, or not operational as modelled, the real climate balance changes materially. The Applicant cannot rely on BESS-enabled climate benefits while avoiding a no-BESS sensitivity case. As the BESS is only Gate 1, there is no guarantee that it will ever be deliverable.	decarbonisation, security of supply, and affordability.” The Energy NPSs strongly support low-carbon generation schemes. NPS EN-1 also provides strong support for flexible assets, such as BESS (for example, paragraphs 3.3.5, 3.3.6, 3.3.25) and NPS EN-3 paragraph 2.10.24 provides that “Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolyzers) to maximise the efficiency of land use.” The Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). Upon receiving consent for the Scheme (if granted) the Applicant would re-submit the BESS component of the Scheme to a future re-

ID	Theme	Representation	Applicant's Response
			prioritisation round to seek a Gate 2 connection offer (firm connection date) for the BESS. ES Volume 1, Chapter 6 - Climate Change [APP-042] considers a worst-case scenario that is inclusive of BESS with Section 6.9.116 reporting that the Scheme is heavily impacted by embodied carbon emissions associated with replacement of the BESS, predicted to account for 94% of operational phase emissions. It is acknowledged in Section 6.9.93 that additional carbon savings from operating the BESS have been specifically omitted from the overall GHG assessment for the Scheme to avoid double-counting emission savings with primary focus of the GHG assessment on emission reduction through energy generation alone. A 'no-BESS scenario' would assess a fundamentally different scheme than the one for which consent is sought and therefore, does not require assessment.

ID	Theme	Representation	Applicant's Response
BEPS-185	Climate Change	Whole-life carbon benefit remains unproven and assumption-led The chapter now includes quantified construction, operational and decommissioning GHG estimates, but that does not make the claimed climate benefit robust. The chapter itself says estimated emissions are based on current best available baseline data and assumes current carbon values for replacement components even though these may change. It also assumes all PV panels will be fully replaced once, 3% ad hoc replacement, one transformer replacement, and up to five BESS replacements over the Scheme life. The chapter then presents the operational phase as significant and beneficial overall. But that favourable conclusion is sensitive to a chain of assumptions about future grid intensity, product lifespan, replacement burdens, generation assumptions, and BESS operation. That is precisely why developer-presented carbon calculations must not be accepted at face value. Comparable solar NSIP disputes elsewhere have shown that climate calculations can materially overstate benefit where embedded carbon, replacement cycles, storage impacts, curtailment risk and baseline assumptions are treated too favourably. East Pye's chapter gives no reason why its own modelling should be treated as immune from that concern. On the contrary, the dominance of BESS	Information relative to product lifecycles is determined by the manufacturer with associated replacement periods calculated based on the Scheme lifespan and subsequently accommodated for. ES Volume 1, Chapter 6 - Climate Change [APP-042] considers conservative yet reasonable worst-case approaches. The assessment has incorporated assumptions that err on the side of caution, ensuring that the reported carbon emissions profile is not understated for the Scheme. Thus, the approach provides confidence that the Scheme's actual carbon intensity will likely be lower than the figures presented. The Applicant refers to its responses to BEPS-184

ID	Theme	Representation	Applicant's Response
		replacement in the operational emissions profile shows the need for heightened scrutiny.	
BEPS-186	Climate Change	The chapter fails to assess the climate impact without the BESS This deserves separate emphasis. The chapter openly states that the BESS is assumed to support the solar part of the Scheme and calculates additional BESS-related carbon savings, although those savings are not included in the primary GHG total to avoid double counting. It nevertheless says it is important to acknowledge the significant climate change mitigation potential of integrating the BESS. However, as the BESS is only Gate 1, there is no guarantee that it will ever be deliverable. That is not acceptable unless the climate chapter also assesses the Scheme without the BESS. The Applicant should not be permitted to place weight on a BESS-dependent climate narrative while avoiding a no-BESS assessment. Without that sensitivity analysis, the decision-maker is not being shown the true climate position of the consented project.	The Applicant refers to its response to BEPS-184.
BEPS-187	Climate Change	Baseline and comparison choices understate uncertainty The chapter's carbon logic depends on a comparison against future electricity-system carbon intensity and on contextualisation against carbon budgets. It may be presented as conservative in parts, but it also masks uncertainty. For example, the BESS savings calculation	The Applicant refers to its response to BEPS-182 and BEPS-184.

ID	Theme	Representation	Applicant's Response
		excludes BESS replacement emissions from the operational intensity comparator and does not fully assess charging emissions. That is a selective treatment of the comparator. The chapter also does not integrate soil-carbon and land-use-change implications in any serious way. Earlier project analysis already identified that this was a missing element. The climate case remains distorted if the site is treated simply as a surface for renewable generation rather than as an existing agricultural and ecological resource with its own carbon, hydrological and resilience functions.	
BEPS-188	Climate Change	Cumulative climate effects remain inadequately assessed PINS did not agree that cumulative climate effects could be scoped out. It required the ES to consider how other developments cumulatively may affect the vulnerability of the development to climate change, including changes in flood flows, and cumulative GHG emissions or savings. The chapter's cumulative response remains inadequate. It says the receptor for GHG is the global atmosphere and that all projects worldwide have the potential to contribute to cumulative impacts on the global climate. That is true at an abstract level, but it is not a meaningful cumulative assessment of East Pye in its real regional context. The issue is not whether GHG molecules are global. The issue is whether this Scheme, in combination with other energy, housing, transport and grid schemes in South Norfolk and East Anglia, creates cumulative climate burdens through	The Applicant refers to its response to BEPS-179 and BEPS-180. In ES Volume 1, Chapter 6 - Climate Change [APP-042] the Applicant also signposts to ES Volume 1, Chapter 19 - In-Combination Effects Assessment [APP-055] in Section 6.5.9 and Section 6.12.3 onwards and in response to PINS (see Table 6.1, ID 3.19.3), highlighting that in-combination climate change effects have been considered alongside other topics for the Scheme. In addition, the Applicant in Section 6.12.5 refers to ES Volume 3,

ID	Theme	Representation	Applicant's Response
		construction emissions, water pressure, altered runoff, flood flows, land-use change and infrastructure dependence. The LLFA expressly supported inclusion of proposed but unconsented schemes in cumulative assessment because there are many similar solar and BESS schemes in the area with potential overlapping programmes and downstream flood implications. The chapter does not appear to grapple with that point in a substantive way.	Appendix 2.4 - Cumulative Schemes [APP-116] , which considers cumulative plans and projects aside from the Scheme and in the surrounding area(s).
BEPS-189	Climate Change	In-combination climate effects are fragmented across the ES PINS agreed that a separate in-combination climate chapter could be scoped out only because the relevant climate factors would be assessed through other relevant topics, and Chapter 6 should signpost where those factors were assessed. In practice this fragmentation still creates a defect. Surface water runoff, groundwater interaction, soil condition, planting success, biodiversity adaptation, access resilience and firewater management are all climate-related matters, but the applicant disperses them across other chapters and outline plans. That prevents an integrated judgment on whether the Scheme is actually climate-resilient and whether it exacerbates climate-related risk.	The Applicant refers to its response to BEPS-181.
BEPS-190	Climate Change	Secured adaptation and mitigation remain weak The chapter relies extensively on embedded and future management measures. But adaptation needs to be real,	The proposed management and mitigation measures set out in the ES [APP-036 to APP-195] and are secured through various outline

ID	Theme	Representation	Applicant's Response
		project-specific and secured, not left at a high level. Earlier project material already identified this problem: mitigation and adaptation were weak or deferred rather than clearly secured through the DCO. The same concern remains. Measures such as water management, fire suppression, and surface water control are repeatedly signposted to outline plans, even though consultees identified the need for much more defined drainage, runoff and flood management information.	management plans [APP-196 to APP-205]. Of particular relevance to the assessment of effects on local communities and mitigation measures are set out in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], Chapter 11 – Transport and Access [APP-047], Chapter 12 – Noise and Vibration [APP-048], Chapter 13 – Air Quality [APP-049], Chapter 14 - Socio-Economics [APP-050], and Chapter 18 - Other Environmental Matters [APP-054]. Further detail will be provided in the final management plans, which will be substantially in accordance with the outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with any relevant statutory consultees, where specified in the Draft DCO [AS-032].
BEPS-191	Climate Change	Decommissioning is still uncertain and only partly resolves the scoping issue PINS required decommissioning GHG emissions to be characterised. The ES now does that but wider decommissioning uncertainty remains relevant to climate	A preliminary assessment of the potential GHG emissions during decommissioning is provided in ES Volume 1, Chapter 6 Climate Change [APP-042] Section 6.5, with

ID	Theme	Representation	Applicant's Response
		and resilience. The LLFA noted that decommissioning appeared only partial, with some infrastructure remaining, and that it was not clear whether access tracks may be retained or whether the site would be returned to previous use and condition. That undermines any simple presentation of the Scheme as wholly temporary and readily reversible in climate and land-use terms.	Section 6.9 onwards outlining further details for the decommissioning phase of the Scheme. Table 6.1 (PINS ID 3.19.1) reiterates that this element has been scoped in at PINS' request and also signposts the above Sections. In ES Volume 1, Chapter 6 - Climate Change [APP-042] the Applicant highlights Section 6.8.14 with reference to Outline DEMP [APP-198]. The Applicant stresses that detail surrounding measures to support the decommissioning phase are currently limited as the decommissioning environment beyond 2091 is likely to be considerably different to today. In addition, Section 6.8.15 clearly outlines that the environmental landscape in 2091 is difficult to predict with certainty, thus it is prudent that the Scheme maintains its flexibility in the decommissioning approach noting that future technological and regulatory advancements will likely occur and may be applicable in due course.

ID	Theme	Representation	Applicant's Response
			The Applicant also signposts in Table 6.11 reference to ES Volume 1, Chapter 11 - Transport and Access [APP-047], Chapter 15 - Soils and Agriculture [APP-051] and Chapter 16 - Ground Conditions [APP-052] of which designated chapters consider and provide assessment of the Scheme with regards to access tracks and ground environment such as previous use and condition.
BEPS-192	Climate Change	Conclusion Chapter 6 should not be treated as establishing a reliable climate case for the Scheme. It remains too narrow, too fragmented and too dependent on optimistic or insufficiently tested assumptions. It does not robustly assess whether the Scheme would worsen local climate-related risks, does not adequately integrate East Anglia's water stress into climate resilience, does not properly assess cumulative climate burden, and does not test the project's climate balance without the BESS. Its claimed climate benefit is therefore not established and cannot lawfully be given substantial weight against the significant ecological, agricultural, hydrological, heritage and community harms arising elsewhere in the application.	The Applicant refers to its response to BEPS-179, BEPS-180, BEPS-182, and BEPS-184. Data inputs utilised in ES Volume 1, Chapter 6 - Climate Change [APP-042] are adopted from manufacturer's indicative specifications (e.g. PV panels) and are comparable to those utilised on similar solar NSIPs, thus limiting any optimistic or insufficient assumptions associated with this Scheme, instead deemed as unnecessary or unwarranted. Information relative to product lifecycles is determined by the manufacturer with associated

ID	Theme	Representation	Applicant's Response
			replacement periods calculated based on the Scheme lifespan and subsequently accommodated for. Further reinforcing that assumptions within ES Volume 1, Chapter 6 - Climate Change [APP-042] are limited, instead the Applicant has provided a robust climate change assessment for the Scheme that follows IEMA guidance.
BEPS-193	Climate Change	Remedies sought The Applicant should be required to provide a revised and integrated climate assessment before the climate case is afforded material weight. That revised assessment should include: a with-BESS and without-BESS climate comparison; transparent and fully evidenced whole-life carbon modelling; proper assessment of water-resource resilience and confirmed water supply; quantified modelling of runoff, infiltration, groundwater recharge and off-site flood implications under future climate conditions; a genuine cumulative climate assessment that addresses regional infrastructure interaction and flood-flow change; and clearly secured adaptation and mitigation measures through enforceable DCO requirements. Failing that, the Examining Authority should attach very limited weight to the claimed climate benefits of the Scheme and should find	The Applicant refers to its response to BEPS-182, BEPS-184, and BEPS-188. It is acknowledged in ES Volume 1, Chapter 6 - Climate Change [APP-042] the Applicant signposts that the Scheme's construction mitigation measures are set out in Outline CEMP [APP-196] (see Table 6.1 and Section 6.4.10 onwards), the operational measures are set out within the Outline OEMP [APP-197] (see Section 6.8.2 onwards), and the Scheme's mitigation measures for decommissioning phase are referenced in Outline DEMP [APP-198] (see Section 6.8.14). Section

ID	Theme	Representation	Applicant's Response
		that Chapter 6 does not demonstrate a robust or policy-compliant climate case.	6.8.4 of ES Volume 1, Chapter 6 - Climate Change [APP-042] does stipulate embedded mitigation measures that have been considered with respect to the Scheme and are applicable for Climate Change.
BEPS-194	Landscape and Visual	Chapter 7 – Landscape and Visual Effects BEPS objects to the proposed development on landscape and visual grounds. Chapter 7 and its supporting appendices do not provide a reliable or complete basis for concluding that the scheme's landscape and visual effects are acceptable. On the applicant's own case, the scheme gives rise to widespread significant adverse effects during construction, significant adverse operational effects at Year 1 across multiple sites and receptors, and residual significant effects even at Year 15, especially around Site 1, the BESS, key public rights of way and selected settlements and viewpoints. The central problem is not only that the scheme causes substantial harm, but that the applicant's assessment persistently narrows, fragments or manages away that harm through constrained study areas, compartmentalised receptor treatment, exclusion of lighting from the chapter, reliance on future planting, and a repeated tendency to describe a highly sensitive rural landscape in strong terms while ultimately rating much of it only as of 'medium' sensitivity. Appendix 7.2 is particularly revealing in this	The Applicant does not agree with the assertion that ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and its supporting appendices do not provide a reliable or complete basis for assessing the landscape and visual effects of the Scheme. The Landscape and Visual Impact Assessment (LVIA) has been undertaken by Chartered Landscape Architect in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). The assessment methodology, study area, baseline, view locations and significance criteria were agreed through consultation with relevant stakeholders and are fully reported in ES Chapter 7 and supporting appendices.

ID	Theme	Representation	Applicant's Response
		respect: the baseline repeatedly identifies expansive skies, tranquillity, wooded tributary valleys, historic settlement patterns, important recreational routes, ancient woodland, veteran trees and dark-sky conditions, but most site parcels are nevertheless judged to be only of medium sensitivity.	The LVIA identifies significant adverse effects where these are predicted to occur and does not seek to minimise or disregard them. As is typical for large-scale infrastructure projects, significant effects are identified during construction and in the early years of operation where receptors are in close proximity to the Scheme. The assessment also acknowledges that some significant effects would remain at Year 15. These conclusions are transparently presented within the ES and demonstrate that the assessment has robustly identified the Scheme's effects rather than seeking to understate them. The suggestion that the assessment "narrows, fragments or manages away" landscape and visual effects is not accepted. The study area was established in accordance with professional judgement, taking account of the nature, scale and potential visibility of the Scheme. In relation to landscape sensitivity, the assessment does not rely upon the presence of individual valued features

ID	Theme	Representation	Applicant's Response
			but considers the combination of landscape value and susceptibility in accordance with GLVIA3. The fact that the baseline identifies characteristics such as expansive skies, tranquillity, wooded tributary valleys, historic settlement patterns, recreational routes, ancient woodland, veteran trees and dark skies does not automatically result in a judgement of high landscape sensitivity. The Applicant therefore does not agree that the sensitivity judgements are inconsistent with the baseline findings. The presence of valued landscape features and characteristics has been fully taken into account within the assessment, alongside other factors that influence landscape susceptibility and value. With regard to mitigation, the assessment follows established EIA practice by reporting effects during construction, at Year 1 of operation and at Year 15, thereby enabling decision-makers to understand both the initial and longer-term effects of the

ID	Theme	Representation	Applicant's Response
			Scheme. Consideration of the benefits of mitigation planting as it becomes established is a standard component of landscape assessment and does not represent an attempt to minimise effects. It reflects reasonable assumption of the effect of landscape mitigation establishment over time. A glint and glare assessment is presented in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] and ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025 to AS-029]. Measures to minimise glint and glare and control lighting from the Scheme are described in ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151] with measures secured in the Outline CEMP [APP-196] and Outline OEMP [APP-197]. Further, mitigation for glint and glare in the form of instant hedgerow is proposed, as described in the Outline LEMP [APP-199].

ID	Theme	Representation	Applicant's Response
BEPS-195	Landscape and Visual	Failure to assess the landscape as an interconnected historic and lived environment The receiving environment is not a generic tract of agricultural land. It is an interconnected rural landscape composed of open plateau farmland, tributary valleys, wooded horizons, hedgerows, scattered farmsteads, villages, lanes, public rights of way, heritage assets and dark rural skies. Appendix 7.2 confirms that the relevant baseline includes conservation areas, hundreds of listed buildings, registered parks and gardens, recreational assets, protected trees and hedgerows, district landscape character areas and site-specific perceptual qualities. The South Norfolk and High Suffolk Claylands NCA is described as a flat or gently undulating plateau incised by small wooded river valleys, with ancient woodland, hedgerow trees, dispersed settlements, high tranquillity away from major roads, as prominent features. Yet the assessment does not carry this understanding through in a joined-up way. Instead, it repeatedly subdivides the scheme into separate technical parcels and component parts, which understates the cumulative transformation of a coherent agrarian and inhabited landscape. That defect is especially acute because the scheme is not merely solar arrays. It includes panels up to 4.5 m high, BESS infrastructure at 4.5 m, 132 kV substations at 7 m, 400 kV substations at 13 m and a National Grid substation at 15 m. This is a dispersed industrial development	The Applicant does not agree with the comment that ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] failed to assess the landscape as an interconnected and lived environment. The assessment recognises the landscape as a complex and interconnected environment comprising physical, cultural, historic and perceptual characteristics. As described in the baseline and landscape character assessment, consideration has been given to landscape character, settlement pattern, heritage features, public rights of way, vegetation structure, tranquillity and other characteristics that contribute to the experience and perception of the receiving landscape. The South Norfolk and High Suffolk Claylands National Character Area (NCA) is assessed as a landscape receptor in its own right. The assessment then considers the effects of the Scheme at progressively finer scales, including regional landscape character areas, local landscape character areas and site-specific

ID	Theme	Representation	Applicant's Response
		stretching across multiple landscape units. It should be assessed as such.	receptors. This approach is consistent with established LVIA practice and enables effects to be understood at different geographic scales rather than treating the landscape as a series of disconnected parcels. The assessment of landscape effects is undertaken for the Scheme as a whole and is not limited to the assessment of individual components in isolation. Whilst the Scheme has been described by reference to its constituent elements, including solar arrays, BESS infrastructure, substations, access routes and associated works, the landscape assessment considers the combined influence of these components on landscape character and visual amenity. The assessment also includes consideration of cumulative effects where relevant. The subdivision of the Scheme into sites and landscape character receptors is a recognised and necessary assessment methodology that enables effects to be identified and

ID	Theme	Representation	Applicant's Response
			reported in a clear and proportionate manner. This does not result in the cumulative influence of the Scheme being understated.
BEPS-196	Landscape and Visual	Unlawful or irrational fragmentation of landscape, heritage, residential and visual assessment A major flaw in Chapter 7 is fragmentation. Appendix 7.2 expressly includes heritage assets and recreational assets as relevant landscape receptors, but then repeatedly removes conservation areas, listed buildings and registered parks and gardens from the substantive landscape assessment on the basis that they are considered further in Chapter 10. This is methodologically unsound. Heritage assets do not matter only as "heritage" receptors; they also contribute to landscape character, scene composition, settlement edge identity and the sensitivity of views. The same fragmentation occurs in relation to private residential amenity. Private visual effects are not integrated into the Chapter 7 assessment but are instead separated into Appendix 7.8, where they are treated through a narrow Residential Visual Amenity Threshold exercise. That does not answer the broader planning issue that this scheme would repeatedly intrude into lived rural space, settlement approaches, farmsteads and residential outlook.	The Applicant does not agree that the assessment has unlawfully or inappropriately fragmented the consideration of landscape, heritage, residential and visual effects. The assessment has been undertaken in accordance with established Environmental Impact Assessment (EIA) and LVIA practice, which recognises that landscape, visual, heritage and residential amenity effects are distinct topics requiring separate assessment methodologies, whilst also acknowledging the interaction between them. The division of these topics into separate ES chapters and appendices is a standard and proportionate approach to assessment. With regard to heritage assets, ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] acknowledges the contribution that conservation areas, listed buildings, registered parks

ID	Theme	Representation	Applicant's Response
		There is similar fragmentation in relation to lighting. The lighting strategy identifies landscape, visual, residential, ecological, conservation area, airfield and dark-sky receptors likely to be affected by lighting, yet Chapter 7 excludes lighting effects from the main landscape and visual chapter because they are dealt with in a separate strategy. A mitigation strategy is not a substitute for a proper assessment of likely significant effects.	and gardens and other historic features make to landscape character and the baseline description. However, the assessment of effects on the significance of heritage assets is appropriately undertaken within ES Chapter 10 – Cultural Heritage [APP-046], which applies the relevant heritage assessment methodology. This avoids duplication of assessment whilst ensuring that heritage effects are fully considered by suitably qualified specialists. In relation to residential amenity, planning policy does not seek to protect private views. The LVIA assesses effects on publicly accessible views and visual receptors, including users of public rights of way, roads and settlements, whilst residential visual amenity is considered separately through the Residential Visual Amenity Assessment (RVAA) presented in ES Volume 3, Appendix 7.8 [APP-148]. This approach accords with Landscape Institute guidance, which distinguishes between general visual effects and the specific

ID	Theme	Representation	Applicant's Response
			assessment of whether a development would become overbearing, overwhelming or oppressive when experienced from a residential property. With regard to lighting, the Applicant does not agree that Chapter 7 should have undertaken a separate assessment of operational lighting effects. In this context, a standalone night-time landscape and visual assessment was not considered necessary, as the proposed lighting is not predicted to give rise to significant landscape or visual effects. The likely effects of lighting have nevertheless been considered through ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151] with measures secured in the Outline CEMP [APP-196].
BEPS-197	Landscape and Visual	Inadequate study area and underassessment of effects beyond 2 km The chapter adopts a variable study area of 3 km from the National Grid substation and 400 kV substations, 2 km from the sites and BESS, and 1 km from the cable route corridor. That remains too constrained for a scheme with	The Applicant does not agree that the study area adopted for the LVIA is inadequate or that effects beyond 2 km have been underassessed. The extent of the study area was determined through professional

ID	Theme	Representation	Applicant's Response
		panels up to 4.5 m, major substation infrastructure up to 15 m, and a distributed footprint across open plateau and valley-edge landscapes. The chapter also accepts that more distant visibility is possible for the National Grid substation and the 400 kV substations. Appendix 7.4 reinforces the point that the visual envelope is wider than the applicant seeks to imply. It identifies open and expansive agricultural landscapes, long and medium-distance visibility, high-sensitivity viewpoints and visibility of the National Grid and 400 kV infrastructure into the long distance, including from Tibenham Airfield. This matters because the applicant appears to assume that significance rapidly diminishes beyond relatively short distances. That is not a safe assumption where the infrastructure includes tall substations and where the solar arrays themselves are 4.5 m high and tilting, giving them greater apparent mass, visibility and visual activity than low static arrays.	judgement, taking account of the scale, nature and likely visibility of the Scheme, and is considered proportionate. The assessment adopts a variable study area comprising 3 km from the National Grid Substation and 400 kV substations, 2 km from the solar sites and BESS, and 1 km from the cable route corridor. This approach reflects the differing scale and visibility of the Scheme components and is consistent with the findings of the range of Zone of Theoretical Visibility analysis undertaken to support the Application as presented in ES Volume 2, Figure 7.5.1 to 7.5.11 Zone of Theoretical Visibility [APP-070 to APP-080]. The Applicant acknowledges that visibility of some Scheme components, particularly the National Grid Substation and 400 kV substations, may extend beyond the defined study area in certain locations. However, visibility alone does not equate to significant visual effects. The assessment demonstrates that the magnitude of visual effects generally

ID	Theme	Representation	Applicant's Response
			reduces with increasing distance from the Scheme, reflecting the diminishing scale and prominence of the development within the wider landscape context. This is evidenced by the findings of the visual assessment. For example, view locations VL5 to VL9 associated with Site 1 represent medium to long distance views towards the National Grid Substation. None of these view locations identify significant visual effects. In particular, VL8 is located close to the edge of the 3 km study area and includes views of the National Grid Substation, the tallest element of the Scheme. The assessment concludes that effects at this location are not significant, demonstrating that visual effects diminish with distance and providing confidence that significant effects are unlikely to occur at greater distances.
BEPS-198	Landscape and Visual	Downplaying of baseline sensitivity The applicant's own baseline material describes a more sensitive receiving environment than the final evaluative	The Applicant does not agree that the sensitivity of the receiving landscape has been understated. Landscape

ID	Theme	Representation	Applicant's Response
		judgments acknowledge. Appendix 7.2 identifies a landscape with expanses of tranquillity, dark skies, route-based recreational value, ancient woodland, veteran trees, important hedgerows, conservation areas, listed buildings and distinctive local character. Yet most individual sites are still assessed only as of medium sensitivity. That is particularly questionable for the Great Moulton Plateau Farmland, which is described as open, elevated plateau farmland with expansive skies, distant views, sparse hedgerows and disused airfields as a defining feature. It is also questionable for Site 7 and Site 8, where the baseline records moderate to high tranquillity, ancient woodland, veteran trees and some of the darkest night skies within the scheme. The same inconsistency appears in the eastern part of the scheme. The district LCAs B5 Chet Tributary Farmland and C2 Thurlton Tributary Farmland with Parkland are both assessed as High Sensitivity, with explicit reference to the setting of the Broads and the intact rural and tranquil qualities of the landscape. Yet Site 10 itself is rated only Medium sensitivity. That mismatch should be given little weight.	sensitivity has been assessed in accordance with the LVIA methodology, taking account of both the value of the landscape and its susceptibility to the type of development proposed. The presence of valued characteristics or individual landscape features does not automatically result in a judgement of high sensitivity; rather, sensitivity is determined through consideration of the landscape as a whole and its capacity to accommodate change. The baseline descriptions in ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119] identify a range of positive landscape characteristics across the Scheme area, including tranquillity, dark skies, recreational assets, ancient woodland, veteran trees, important hedgerows and historic features. These characteristics have been fully considered within the assessment. However, sensitivity judgements also take account of existing influences and detracting features, as well as the extent to which the landscape is

ID	Theme	Representation	Applicant's Response
			susceptible to the introduction of the proposed development. In the case of the Great Moulton Plateau Farmland, whilst the landscape exhibits some positive characteristics, it also contains a number of existing detracting and human-influenced features. These include the A140, which passes north-south through the character area, straight rural roads, large-scale agricultural buildings, water towers, telegraph poles and other vertical infrastructure that are apparent within the open landscape. These features influence the existing character of the landscape and demonstrate that it is not wholly undeveloped or free from modern influences. For these reasons, the assessment concluded that the landscape was of medium sensitivity rather than high sensitivity. Similarly, for Sites 7 and 8, the presence of features such as areas of tranquillity, ancient woodland, veteran trees and dark skies was fully

ID	Theme	Representation	Applicant's Response
			recognised within the baseline. Site 8 is considered of high sensitivity. However, sensitivity was determined through consideration of all relevant landscape characteristics, including existing land use, landscape structure, condition and susceptibility to the proposed development. The resulting judgements represent a balanced professional assessment rather than a simple reflection of the presence of individual valued features. Both B5 Chet Tributary Farmland and C2 Thurlton Tributary Farmland Parkland form part of the setting of the nationally designated Broads National Park and therefore have heightened levels of landscape value resulting in a high sensitivity. The Applicant also does not agree that there is an inconsistency between the sensitivity assigned to the District Landscape Character Areas and individual Site areas. Landscape Character Areas and Site-specific landscape receptors are assessed at different scales and for different purposes. It is therefore entirely

ID	Theme	Representation	Applicant's Response
			possible, and methodologically appropriate, for a wider landscape character area to be assessed as having high sensitivity whilst a smaller part of that landscape, within which development is proposed, is assessed as having a different level of sensitivity based on its particular characteristics, context and susceptibility to change.
BEPS-199	Landscape and Visual	Site 1 and the BESS: exceptional landscape and visual harm Site 1 and the BESS stand out repeatedly in the applicant's own material as among the most harmful parts of the scheme. Appendix 7.3 states that at Year 1 the BESS site would experience a total change to some key landscape characteristics and be subject to Major Significant effects, reducing only to Moderate Significant at Year 15. It states that Site 1 would experience a substantial change to key characteristics during construction, a total change at operation Year 1, and would remain Major Significant at Year 15. Appendix 7.2 describes Site 1 as open and elevated plateau farmland, moderately tranquil, relatively dim at night, traversed by existing 400 kV overhead lines and pylons, with a high level of recreational value due to a well-defined PRoW network and with the settlement edge of	The Applicant notes that the assessment identifies significant landscape effects associated with Site 1 and the BESS, as reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. However, the relevant representation does not accurately reflect the assessment conclusions. For the BESS, the assessment identifies significant effects during construction, Major adverse significant effects at Year 1 of operation, reducing to Moderate adverse significant effects at Year 15 following the establishment of mitigation planting. For Site 1, significant effects are identified throughout the assessment period,

ID	Theme	Representation	Applicant's Response
		Great Moulton located around 200 m away. The BESS site is likewise described as open, exposed, moderately tranquil and relatively dim at night. This is not marginal harm. It is a major permanent transformation of one of the scheme's most open, exposed and publicly experienced landscapes.	with Major adverse significant effects remaining at Year 15. These findings are transparently reported within the LVIA and form part of the overall planning balance. The Applicant also notes that terms such as "substantial change" and "exceptional harm" are not interchangeable. The LVIA assesses effects using a defined methodology based on landscape sensitivity and the magnitude of change. While significant effects are identified for Site 1 and the BESS, the assessment does not conclude that these effects represent exceptional landscape harm. Rather, the effects are assessed and reported in accordance with the agreed LVIA methodology.
BEPS-200	Landscape and Visual	Failure to assess night-time character, dark skies and tranquillity properly This is one of the clearest defects in the Chapter 7 suite. The Lighting Strategy confirms that the Order Limits fall within a rural dark landscape and are to be treated as E2 'Rural' for lighting purposes. It also confirms that some parts of the scheme lie within the darkest night-sky areas or transitional dark-sky zones. Appendix 7.2 repeatedly	The Applicant does not agree that the assessment has failed to properly consider night-time character, dark skies or tranquillity. The baseline assessment recognises the presence of dark skies and tranquil rural landscapes within the Scheme

ID	Theme	Representation	Applicant's Response
		cross-refers to CPRE dark-sky and tranquillity mapping for the sites, including relatively dim skies, transitional dark-sky areas and the darkest night skies at Sites 7 and 8. The Lighting Strategy also confirms that operational lighting will be required for the National Grid Substation, the 132 kV and 400 kV substations and the BESS, including motion-sensing security lighting and illuminated BESS perimeter columns. It also identifies temporary construction lighting for compounds, laydown areas, vehicles, HDD works and abnormal load movements. Despite this, Chapter 7 excludes lighting effects from the main assessment. That is not a lawful or robust response. The question is not only whether a strategy exists, but what effect the introduction of lit compounds, motion-activated luminaires, emergency or maintenance lighting and night-time industrial infrastructure would have on landscape character, dark skies and tranquillity. That assessment is missing. Figure 7.8 and the PRow appendix add further weight. The CPRE tranquillity mapping shows that much of the scheme lies within a relatively tranquil rural landscape, and Appendix 7.9 repeatedly describes PRowS as tranquil, rural or enclosed in a way that contributes to quiet recreational experience.	area and these characteristics have informed both the Scheme design and the assessment process. These findings are presented in ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119]. Effects on tranquillity have been assessed as part of the Landscape Assessment and are presented in ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]. Effects on perceived changes to tranquillity as experienced by receptors using the PRow network are also considered in ES Volume 3, Appendix 7.9 – PRow Visual Amenity Assessment [APP-149]. The Scheme has limited permanent lighting, it is directed to where it is required for safety, security, maintenance or emergency purposes. This lighting would be controlled, directional and designed to minimise off-site effects. Similarly, construction lighting would be temporary in nature

ID	Theme	Representation	Applicant's Response
			and used only where necessary to facilitate safe construction activities. Given the limited extent, duration and level of control associated with the proposed lighting, the Applicant did not undertake a separate night-time Landscape and Visual Impact Assessment, as significant effects are not anticipated. The Environmental Statement focuses on the identification and assessment of significant environmental effects, and a separate night-time assessment was therefore not considered necessary.
BEPS-201	Landscape and Visual	Understatement of the visual consequences of 4.5 m tilting panels and engineered infrastructure The solar arrays are not visually recessive features. They are up to 4.5 m high and tilting, and must be assessed as large, repetitive industrial structures across open farmland. Appendix 7.8 confirms that 4.5 m is the height assumed in the residential visual amenity work. The applicant's own operational descriptions recognise that the scheme would result in long-term change from predominantly arable agricultural landscape to one with solar and associated infrastructure; that solar panels may oversail hedgerow field boundaries; that they may appear	The Applicant does not agree that the assessment understates the visual consequences of the Scheme. The LVIA has assessed the solar arrays and associated infrastructure based on their actual scale and characteristics, including panel heights of up to 4.5 m and tilting. The assessment does not treat the development as a visually recessive or insignificant land use change, nor does it characterise the scheme simply as an agricultural use.

ID	Theme	Representation	Applicant's Response
		blue or grey depending on conditions; and that their regular edges may appear conspicuous in irregular landscapes. Those admissions should be given real weight. A scheme of this scale cannot be reduced to a benign "field use" simply because the land remains notionally agricultural beneath the panels. The visible form is engineered, repetitive and industrial.	The assessment did not refer to the Scheme as a "field use". Land under the panels will be restored to agricultural use on decommissioning, but the Applicant acknowledges the change of land use.
BEPS-202	Landscape and Visual	Public rights of way, route experience and recreational harm Appendix 7.9 is highly damaging to the applicant's case. It confirms that the effects on PRowWs are not incidental, but extensive and repeated. It identifies significant adverse visual effects on many PRowWs during construction and often at Year 1, with several routes still significant at Year 15. The appendix also confirms closures or diversions on many individual routes during construction across the BESS/Site 1 area, Site 2, Site 3, Site 4, Site 5, Site 7, Site 8, Site 9, Site 10 and the cable corridor. Several routes remain significantly affected at Year 15, including Great Moulton FP13 and FP14, Great Moulton RB19, Morningthorpe FP5, Hempnall FP2 and Saxlingham Nethergate FP12. Appendix 7.2 also confirms that the Boudicca Way and Via Beata are High sensitivity recreational routes. The route-	The Applicant acknowledges that the assessment identifies significant visual effects for users of certain PRowWs, particularly during the construction phase and, in some locations, there is significant effect in Year 15. The ES also recognises the High sensitivity of recreational receptors, including users of the Boudicca Way and Via Beata Way. Closure of routes during construction phase are temporary, there is not permanent closure of PRowW within the Scheme. The Applicant disagrees that Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149] demonstrates that recreational

ID	Theme	Representation	Applicant's Response
		based and sequential nature of harm is therefore a central feature of the scheme, not a side issue.	effects are a "central feature" of the Scheme to the extent suggested. Significant effects are not predicted across the entirety of the routes concerned, nor across the wider PRoW network. The extent, magnitude and duration of effects vary considerably depending on local landscape context, topography, vegetation cover and proximity to the Scheme. The assessment further demonstrates that proposed landscape mitigation would reduce effects over time, resulting in a reduction in the number of significant effects between Year 1 and Year 15. The interaction between the Scheme and PRoW network with regards to traffic and transport has been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047] and the Outline Public Rights of Way and Permissive Paths Management Plan [APP-203]. Whilst some PRoWs may require temporary closure, diversion or management during construction, these measures

ID	Theme	Representation	Applicant's Response
			are temporary and are required to facilitate the safe construction of the Scheme. Appropriate mitigation, including signage, alternative routes, traffic management measures and advance notification, will be implemented to minimise disruption to users. No permanent closures of PRowS are proposed as part of the Scheme and any PRowS temporarily affected during construction will be reinstated and reopened following completion of the relevant works.
BEPS-203	Landscape and Visual	Understatement of residential visual harm Twenty residential properties were identified within 100 m of the maximum development parameters, across multiple sites. The applicant then used a narrow methodology and only carried two properties forward to detailed assessment, even though the wider residential receptor plan shows numerous named properties in close proximity to Site 1, the BESS, Site 2, Site 3, Site 5, Site 7, Site 8 and Site 9. For 22 Hillcrest Court (Site 2), the applicant accepts Major to Substantial Adverse and Significant effects at Year 1 for upper floors, and Moderate Adverse and Significant effects at Year 15. For Oakdene Cottage (Site 7L), it accepts	The Applicant acknowledges that the RVAA identifies significant adverse visual effects for certain residential receptors. In particular, significant effects are predicted for upper-floor views from 22 Hillcrest Court at Year 1 and Year 15, and for first-floor views from Oakdene Cottage at Year 1. Residential Visual Amenity Assessment (RVAA), as presented in ES Volume 2, Appendix 7.8 – Residential Visual Amenity

ID	Theme	Representation	Applicant's Response
		Major Adverse and Significant first-floor effects at Year 1. Yet it still concludes that the Residential Visual Amenity Threshold is not crossed. That conclusion depends on a very high threshold of domination or overbearing effect and on the future success of mitigation planting. The fact that the threshold is not formally crossed does not mean the residential effects are not serious and material.	Assessment [APP-148], has been undertaken in accordance with the Landscape Institute's Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (2019). There is no prescribed or standardised study area for an RVAA. The extent of assessment is determined on a case-by-case basis, taking account of the nature, scale and form of the proposed development, the surrounding landscape context, topography, vegetation and the likely extent of significant visual effects. The Landscape Institute guidance notes that developments comprising large but relatively low-profile structures, including housing developments, road schemes and similar forms of development, are unlikely to require RVAA except potentially for properties in relatively close proximity, generally within the range of approximately 50–250m. The Scheme comprises predominantly low-profile solar PV arrays, together with a limited number of taller elements such as substations and associated

ID	Theme	Representation	Applicant's Response
			infrastructure. Having regard to the characteristics of the Scheme and the surrounding landscape context, the Applicant determined that a 100m study area from the nearest Scheme component represented an appropriate and proportionate basis for identifying properties requiring detailed RVAA consideration. This approach is consistent with the Landscape Institute guidance and reflects professional judgement based on the specific circumstances of the Scheme. The purpose of an RVAA is not to identify all properties from which the Scheme may be visible, nor to assess general visual effects. It is intended to determine whether the scale and proximity of a development would result in residential visual amenity being affected to such an extent that the property would become an unattractive place in which to live, through effects described as visually overbearing, overwhelming or oppressive. The Applicant does not agree that the assessment adopted an

ID	Theme	Representation	Applicant's Response
			unduly narrow methodology. Properties within the study area were reviewed to determine whether there was reasonable potential for effects of the nature contemplated by RVAA guidance. The RVAA threshold is intentionally distinct from conventional visual impact assessment and represents a substantially higher test.
BEPS-204	Landscape and Visual	Overreliance on future planting and assumption-led mitigation This is a recurring weakness across the landscape chapter and appendices. Appendix 7.3 shows that even on the applicant's own case, significant adverse effects remain in important district landscapes at Year 15, including B1 Tas Tributary Farmland and E2 Great Moulton Plateau Farmland, as well as Site 1 and the BESS. Appendix 7.8 similarly relies on future hedgerow and woodland planting to reduce residential effects by Year 15. The arboricultural assessment shows why caution is required here. It identifies a highly structured and sensitive tree and hedgerow framework, but also records likely tree removals, partial removal of groups and hedgerows, excavation within RPAs, and 17 conflicts between development components and ancient/veteran tree or ancient woodland buffers. Those conflicts are to be	The Applicant notes the concerns regarding the effectiveness of proposed mitigation measures. The Green Infrastructure Strategy [AS-005] includes for visual screening and landscape integration. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. The Applicant acknowledges that the ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact

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		addressed by later detailed design, reduced working widths, relocated accesses and specialist supervision. In other words, the scheme's landscape mitigation case depends on a vegetated framework that is itself under construction pressure and partly unresolved. That is not a secure basis for downplaying current or long-term harm.	Assessment [APP-150] identifies 17 potential conflicts with veteran trees and ancient woodland on the Works Plan [AS-002 and AS-003]. A total of 70 ancient or veteran trees within or adjacent to 15m of the Order Limits are present, consisting of 31 individual trees identified during the survey as ancient or veteran trees and 39 individual trees designated as ancient or veteran in the Ancient Tree Inventory. The Scheme will avoid the buffer zones of all ancient or veteran trees identified within or adjacent to the Order Limits in accordance with the minimum offset distances set out in the Design Principles, Parameters and Commitments [APP-213], and construction techniques will be used to avoid impacts to the Root Protection Areas (RPAs) where the cable route intersect the RPAs. The proposed development area and CRCs will be reduced to avoid the RPAs of eight veteran trees. The indicative access routes will be relocated to fall outside

ID	Theme	Representation	Applicant's Response
			the buffers of eight veteran trees and one ancient woodland. Trenchless construction (Avoidance Areas) is proposed to avoid the buffer zone of one veteran hedgerow H52.
BEPS-205	Landscape and Visual	Trees, hedgerows, ancient woodland and arboricultural constraints The Preliminary Arboricultural Impact Assessment confirms that the Order Limits and associated works lie within a landscape strongly structured by mature trees, hedgerows, woodlands and veteran features, including six ancient woodland areas (several of which are SSSIs) abutting the Order Limits and numerous ancient or veteran trees. It also identifies direct conflict between the scheme and these features, including likely full tree removals, partial removal of groups and hedgerows, excavation within retained RPAs, and 17 instances where development areas, cable routes or accesses overlap ancient/veteran tree or ancient woodland buffers. Chapter 7 therefore understates landscape harm where it relies on the existing vegetated framework to contain views and assimilate the scheme, while the applicant's own arboricultural evidence shows that same framework is itself subject to loss, pruning, disturbance and later-stage redesign in order to make the scheme fit.	The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design process. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the ancient woodlands, veteran trees, trees and hedgerows that will be retained. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032]. This includes infill tree planting within existing hedgerows. The Applicant acknowledges the effect of tree and hedgerow removals on the landscape and that such removals can potentially reduce visual screening

ID	Theme	Representation	Applicant's Response
			effectiveness, the effects of this are presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] .
BEPS-206	Landscape and Visual	Site 10, Ditchingham Hall and the Broads-facing eastern character seam Site 10 has been underplayed. Appendix 7.2 describes Site 10 as highly tranquil, enclosed in places by hedgerows, tree belts and woodland blocks, with Pound Lane and Wash Lane forming sunken, enclosed route features, and with a setting between Woodton and Seething. The district LCAs that Site 10 sits within or adjacent to, especially B5 and C2, are both treated as High sensitivity and linked to the setting of the Broads. The baseline also records Ditchingham Hall Registered Park and Garden around the boundary of the study area for Site 10, although it then dismisses it from the landscape assessment on the basis of distance and claimed lack of intervisibility. That should be treated cautiously. Site 10 lies near a sensitive eastern character seam where tributary farmland, parkland context and the broader Broads-facing landscape interact. The scheme should not be assessed as though Site 10 were merely another generic inland field block.	The Applicant agrees that Site 10 is located within a highly tranquil landscape and is enclosed on most boundaries by dense hedgerows, tree belts and woodland features. The site is situated between Woodton and Seething and exhibits a degree of enclosure that contributes to its local landscape character. However, the Applicant disagrees with the assertion that the assessment has understated the sensitivity of Site 10. The wider landscape character areas within and adjacent to which the site is located, namely LCA C2 Thurlton Tributary Farmland with Parkland and LCA B5 Chet Tributary Farmland, are recognised as contributing to the setting of the Broads and have been assessed accordingly within the baseline. While Site 10 lies on the edge of these landscape character areas, it does not exhibit the same level of sensitivity

ID	Theme	Representation	Applicant's Response
			associated with areas located closer to the Broads. This is due to its separation distance from the Broads and the absence of direct visual relationships with either the Broads or Ditchingham Hall Registered Park and Garden. The lack of intervisibility between Sub-Site 10, Ditchingham Hall and the Broads is demonstrated in ES Volume 2: Figure 7.5.2, Site 10 Zone of Theoretical Visibility [APP-071]. Accordingly, whilst the broader landscape context has been fully considered within the assessment, the Applicant does not agree that the landscape sensitivity of Sub-Site 10 has been underplayed.
BEPS-207	Landscape and Visual	Airfields and aviation-related visibility The landscape material cross-supports the aviation objection. Appendix 7.4 acknowledges visibility of the National Grid substation and 400 kV substation into the long distance, including from Tibenham Airfield. The Lighting Strategy expressly identifies Tibenham Airfield as a receptor and states that pilots approaching the airfield may be susceptible to glare from both construction and operational lighting if not properly managed.	The Applicant acknowledges that ES Volume 3, Appendix 7.4 Visual Baseline [APP-121] identifies potential visibility of the National Grid Substation from some locations at longer distances, including the vicinity of Tibenham Airfield. However, the Applicant does not agree that the identification of Tibenham

ID	Theme	Representation	Applicant's Response
		This matters for Chapter 7 because it confirms that visibility and lighting effects extend into aviation-sensitive space and that the applicant itself acknowledges those receptors.	Airfield as a receptor demonstrates a significant landscape and visual effect or indicates that the landscape assessment has underestimated impacts. The fact that infrastructure may be theoretically visible from an aviation receptor does not indicate a significant landscape or visual effect. The Applicant has considered glint and glare impact upon aviation activity associated with Norfolk Gliding Club, operating at Tibenham Airfield, within ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029].
BEPS-208	Landscape and Visual	Cable route corridor effects are understated The cable route corridor is repeatedly treated as of lower susceptibility than the surrounding landscape evidence warrants. Appendix 7.2 describes CRC4, CRC6, CRC7, CRC9 and CRC13 as interacting with multiple field boundaries, PRoWs, local roads, heritage features, wetland or valley-edge characteristics and important hedgerows. Yet several are still judged as of Low susceptibility because agricultural land use is said to be preserved and existing features retained. That is especially questionable where trenching, HDD, closures, crossings and long temporary works are involved.	The Applicant does not agree that the susceptibility of the cable route corridors has been understated. Susceptibility has been assessed with regard to the nature, duration and reversibility of the proposed works, alongside the characteristics and value of the affected landscape receptors. In general, the assessment recognises that temporary construction activities, includes trenching and traffic management measures, may result in

ID	Theme	Representation	Applicant's Response
		CRC7 is a clear example: it lies wholly within the locally valued Tas Rural River Valley, passes through a County Wildlife Site context and is still assigned Low susceptibility despite being High sensitivity overall. The cable route effects should therefore be revisited in a more precautionary and reality-based way.	short-term effects. However, the susceptibility judgements reflect the fact that the cable infrastructure would be located underground, agricultural land would be reinstated following construction, and key landscape features such as important hedgerows, trees and watercourses would be retained or reinstated where required. In the case of CRC7, the Applicant acknowledge that the corridor lies within Tas Rural River Valley and County Wildlife Site. The LVIA has taken account of the construction methods proposed and potential effect. For CRC7, trenchless techniques would be undertaken, meaning the cable would be installed underground without open trenching through the most sensitive landscape features. As a result, there would be no direct landscape or visual effects associated with the cable installation within these areas.

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BEPS-209	Landscape and Visual	Decommissioning and long-term reversibility are overstated Appendix 7.3 shows that decommissioning itself is assessed as materially harmful across multiple landscape units and sites. Significant or moderate adverse effects are identified for the NCA, B1, E2, the BESS, Site 1, Site 4, Site 5, Site 7, Site 8, Site 9 and Site 10. So this is not a case where long-term reversibility can readily be relied upon to soften present-day harm. The scheme creates a prolonged, repeated sequence of harmful change: construction, operation, panel replacement/maintenance, and later decommissioning.	The Applicant does not agree that the assessment overstates the relevance of decommissioning effects or relies on long-term reversibility to diminish the significance of operational effects. It is acknowledged that ES Volume 3, Appendix 7.3 - Landscape Assessment [APP-120] identifies significant effects for certain receptors during decommissioning, the Applicant does not agree that these effects should be characterised as "materially harmful". The LVIA reports likely significant environmental effects in accordance with its assessment methodology, this should not be conflated with the planning judgement as to whether harm is material, unacceptable or determinative in the planning balance. The Applicant acknowledges that the Scheme would result in landscape change during construction, operation and, ultimately, decommissioning. However, decommissioning would occur at the end of the operational life of the Scheme and represents a

ID	Theme	Representation	Applicant's Response
			distinct and limited phase associated with the removal of infrastructure. Decommissioning effects being assessed does not alter or reduce the conclusions reached regarding operational effects, nor does it indicate that operational effects have been understated.
BEPS-210	Landscape and Visual	Inadequate and Potentially Misleading Photomontages and Visualisations The visual evidence relied upon in Chapter 7 should be treated with caution because the photomontages and visualisations appear to have been prepared predominantly from photography undertaken in summer conditions, when trees and hedgerows are in leaf and screening is at its seasonal maximum. In a landscape such as this, where the applicant repeatedly relies on hedgerows, tree belts and woodland edges to contain views and reduce effects, summer-only visualisations risk materially understating the true extent of visibility and the likely magnitude of change for a substantial part of the year. This concern is particularly acute around sensitive receptors where filtered or partial views are central to the applicant's case. Around St Catherine's Church and the Fritton Conservation Area, for example, the degree of enclosure and screening shown in summer conditions does not represent winter reality, when deciduous vegetation is	The Applicant does not agree that the visual evidence is inadequate, misleading, or that it understates the likely visual effects of the Scheme. The visualisations and wirelines prepared for the assessment and presented in ES Volume 3, Appendix 7.6 - Visualisations [APP-135] have been produced in accordance with recognised industry guidance and have been developed to illustrate the Scheme from representative view locations agreed through consultation with South Norfolk Council. The selection of viewpoints was therefore subject to consultation and reflects

ID	Theme	Representation	Applicant's Response
		no longer in leaf and the scheme would be more readily perceptible across and through the field boundary structure. The same concern applies more widely across the Order Limits wherever the applicant relies on existing hedgerows, intermittent tree belts or proposed planting to soften views. The problem is not merely presentational. It affects the evidential basis on which magnitude of visual change is judged. If the photomontages present the scheme in its least visible seasonal condition, they do not provide a fair or robust basis for understanding the actual likely effects on residents, PRow users, heritage settings, settlement edges or the wider rural landscape during autumn, winter and early spring, when visibility may be substantially greater. This is especially important for a scheme of tall, repetitive and engineered infrastructure, including 4.5 metre tilting panels, substations, fencing and associated works, where even filtered winter visibility may materially alter the perception of openness, rural character and heritage setting. It is also relevant that the applicant's own assessments elsewhere repeatedly depend on vegetation screening, whether existing or proposed, to reduce effects over time. Where screening is such a central part of the mitigation case, the visual material must test that case in a realistic worst-case seasonal scenario. Summer-only visualisations do not do so.	locations considered appropriate for assessing likely visual effects. The visualisation does not rely solely on summer conditions. The figures are presented in the following order for each Site: winter baseline photography, winter year 1 visualisation, summer baseline photography, and summer year 15 visualisation. This approach enables the assessment to illustrate seasonal variation in vegetation cover and to demonstrate potential visibility during both maximum and reduced screening conditions.

ID	Theme	Representation	Applicant's Response
		Accordingly, the examination should require winter photomontages and winter wirelines from the key representative views and the most sensitive heritage and settlement-edge locations, including in particular views around St Catherine's Church, Fritton, and other locations where deciduous vegetation presently forms a substantial part of the claimed screening envelope. Without that additional material, the visual evidence base remains incomplete and likely to understate the true visual impact of the scheme. Further, the applicant should be required to provide winter photomontages and leaf-off visualisations for all key viewpoints and sensitive receptors, because the current summer-based visual material materially risks understating the true visual effects of the scheme.	
BEPS-211	Landscape and Visual	Conclusion and remedies sought For all of these reasons, Chapter 7 should be given reduced weight. The applicant's own material demonstrates that the scheme would cause widespread significant adverse landscape and visual effects, serious route-based and residential harm in parts of the scheme, long-term harm to tranquillity, dark skies and rural character, and major transformation at Site 1 and the BESS. The assessment is also structurally flawed through fragmentation, constrained study areas, underweighting of baseline sensitivity, exclusion of lighting from the main	The Applicant refers to its response to BEPS-194 to BEPS-210. The Applicant does not agree that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] should be afforded reduced weight, nor that the assessment is structurally flawed. The LVIA has been undertaken in accordance with established guidance and presents a transparent assessment of likely effects during

ID	Theme	Representation	Applicant's Response
		chapter, and heavy reliance on future planting and later-stage design refinement. Accordingly, BEPS asks the Examining Authority and Secretary of State to require, at minimum, a more complete and integrated reassessment of landscape, visual, residential, lighting, route-based and heritage-setting effects; a fuller assessment of night-time character, dark skies and tranquillity; re-examination of Site 1, the BESS, Site 7, Site 8 and Site 10 as exceptional or highly sensitive locations; a more precautionary assessment of cable route and arboricultural effects; and a revision of the proposed scheme or a substantial reduction in its extent where these harms cannot be avoided. Further, the applicant should be required to provide winter photomontages and leaf-off visualisations for all key viewpoints and sensitive receptors, because the current summer-based visual material materially risks understating the true visual effects of the scheme. If those deficiencies are not remedied, development consent should be refused on the basis that the true scale, duration and experiential depth of landscape and visual harm have not been shown to be acceptable.	construction, operation and decommissioning. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
BEPS-212	Ecology and Biodiversity	Chapter 8 – Ecology and Biodiversity This is not a case where a generally low-value site contains a few discrete ecological constraints that can be managed	The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed

ID	Theme	Representation	Applicant's Response
		through buffers, timing restrictions, outline management plans and later habitat creation. The Applicant's own documents show the opposite. The Order Limits lie across a receptor-dense, functionally connected ecological landscape of priority hedgerows, arable margins, ponds, woodland edges, floodplain habitats, lowland fen, chalk-stream tributaries and supporting habitat for a nationally important bat assemblage. The Scheme also affects a hydrologically connected aquatic system in which the River Tas is itself a chalk stream priority habitat, and in which white-clawed crayfish sensitivity is plainly engaged. The baseline is incomplete, most obviously in relation to botany, where no proper full-season botanical survey has been carried out despite BEPS having expert evidence from a Level 6 botanist calling for surveys due to rare assemblages in the area, particularly in field margins and verge habitats threatened by road widening and associated works. On the Applicant's own policy basis, the only mitigation-hierarchy response consistent with EN-1, EN-3, EN-5 and the NPPF is avoidance. Because the Scheme has not avoided this ecological landscape, it should be recommended for refusal.	methodology of representation. The results and detailed methodology of specific ecological surveys is presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160]. An assessment of potential effects of the Scheme on ecological receptors during construction, operation, and decommissioning is set out within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The scope of assessment has also been agreed through the scoping and consultation process, as described in Section 8.2 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].
BEPS-213	Ecology and Biodiversity	Policy framework and the mitigation hierarchy East Pye Solar's Ecology Chapter states that it is assessed against EN-1, EN-3, EN-5 and the NPPF, and that compliance with EN-1 requires application of the mitigation	The proposed management and mitigation measures set out in the ES [APP-036 to APP-195] and are secured through various outline

ID	Theme	Representation	Applicant's Response
		hierarchy of avoidance, minimisation, restoration and offsets. It also states that BNG is secured through the Outline LEMP and is treated as an inherent part of the Scheme. The Applicant's own policy appendix records the key NPPF refusal principles: if significant harm to biodiversity cannot be avoided, adequately mitigated or, as a last resort, compensated for, permission should be refused; development likely to adversely affect an SSSI should not normally be permitted; and development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland should be refused unless wholly exceptional reasons and a suitable compensation strategy exist. Those are not abstract principles. Applied to East Pye Solar, they point toward refusal. The Scheme has not avoided this sensitive ecological system. It instead overlays it and then seeks to manage residual harm through outline measures, BNG assumptions and generic enhancement. That is not lawful or policy-compliant application of the hierarchy. BNG and habitat creation are at the bottom of the hierarchy. They cannot justify failure to avoid harm to priority habitats, irreplaceable habitats, chalk-stream systems, European Protected Species or functionally linked barbastelle habitat.	management plans [APP-196 to APP-205]. Of particular relevance to the assessment of effects on local communities and mitigation measures are set out in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], Chapter 11 – Transport and Access [APP-047], Chapter 12 – Noise and Vibration [APP-048], Chapter 13 – Air Quality [APP-049], Chapter 14 - Socio-Economics [APP-050], and Chapter 18 - Other Environmental Matters [APP-054]. Further detail will be provided in the final management plans, which will be substantially in accordance with the outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with any relevant statutory consultee, where specified in the Draft DCO [AS-032]. The approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032]. Paragraph 2(4) of Schedule 15 to the Draft DCO [AS-032] requires the Applicant to confirm when submitting the final plan for approval

ID	Theme	Representation	Applicant's Response
			whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that any mitigation measures identified in the Environmental Statement are contained in the final plans or an explanation is provided as to why there is a change (for example, if a mitigation measure is no longer required as technology has advanced and the impact will no longer occur). A failure to do so would be a criminal offence and there are enforcement mechanisms that would ensure such mitigation would be implemented. These management plans are secured via the Requirements contained within Schedule 2 of the Draft DCO [AS-032]. The Applicant has prepared a Statutory Nuisance Statement [APP-208]. This draws upon the assessment conclusions from Environmental Statement and concludes that the construction, operation and maintenance, and decommissioning of

ID	Theme	Representation	Applicant's Response
			the Scheme would not give rise to any impacts that would constitute a statutory nuisance under Section 79(1) of the Environmental Protection Act 1990.
BEPS-214	Ecology and Biodiversity	The Scheme lies across a continuous network of priority habitats The Applicant's own priority habitat figure shows that the Order Limits are saturated with priority habitats rather than merely adjacent to them. Across the nine sheets of Figure 8.5, the Scheme is shown repeatedly intersecting and enclosing hedgerows, arable field margins, ponds, deciduous woodland, statutory main river corridors, floodplain grazing marsh, lowland fen, lowland meadows, lowland dry acid grassland, lowland heathland, traditional orchards and, in places, open mosaic habitat on previously developed land. The mapping shows these habitats spread across the whole Scheme, not confined to isolated pockets. That matters because the ecological effect is network-level. The priority habitat map demonstrates a functioning matrix of linked habitats, particularly hedgerows, margins, ponds, woodland edges and watercourses. It is not credible to treat these as separate small features that can be lost, fragmented or disturbed without affecting the wider system. The Applicant's own ecological desk study likewise	Embedded design principles are detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. These include a 30m standoff distance from ancient woodlands, at least 15m from woodlands, 10m from watercourses, and a minimum of 10m buffer between hedgerows / ditches and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199].

ID	Theme	Representation	Applicant's Response
		describes the Order Limits as an arable field system separated by hedgerows, ditches and grassland margins with scattered trees, ponds and streams, and says those habitats are suitable for a wide range of notable species including bats, skylark, otter, water vole, reptiles, great crested newt and invertebrates. The consequence is straightforward: this Scheme does not sit next to the ecological network; it sits on top of it.	When considering the scale of the Scheme, this will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced connectivity through the site. In addition, the above-named documents also include commitments to extensive buffering of woodlands/ancient woodlands, ponds, trees, and watercourses and will include habitat creation/management within these buffer zones. Thereby resulting in extensive landscape-wide habitat provision for the benefit of local species.
BEPS-215	Ecology and Biodiversity	The baseline is incomplete and the botanical evidence is plainly inadequate The ecological baseline is not robust enough to support the conclusions reached. The most serious omission concerns botany. The Applicant's own extended habitat survey expressly says that it does not constitute a full botanical survey and does not provide accurate mapping of invasive plant species. It also states that its preliminary suitability	The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of specific ecological surveys are presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160]. An assessment of potential effects of the Scheme on habitats during

ID	Theme	Representation	Applicant's Response
		assessment should not be taken as a full and definitive survey of protected species groups. That is a major flaw in this landscape. BEPS has expert evidence from a Level 6 botanist calling for a full-season botanical survey because of important and potentially rare assemblages in the area. That concern is especially acute in relation to the Scheme's road widening, cable works and other construction activity affecting field margins, roadside verges, ditch edges and semi-natural strips. Those are exactly the habitats most likely to support notable plant assemblages and exactly the places where incidental UKHab recording is least capable of providing a sound baseline. The failure matters for two reasons. First, the Scheme relies heavily on works in field margins and along boundaries, yet those are the habitats least properly surveyed. Second, the Applicant cannot lawfully claim to have applied the mitigation hierarchy if it has not first established what is there. Without a proper botanical baseline, there is no objective basis for concluding that important plant assemblages can be avoided or adequately mitigated.	construction, operation, and decommissioning is set out within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The scope of assessment has also been agreed through the scoping and consultation process, as described in Section 8.2 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Embedded design principles are detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. These include a 30m standoff distance from ancient woodlands, at least 15m from woodlands, 10m from watercourses, and a minimum of 10m buffer between hedgerows/ditches and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all

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			proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199]. When considering the scale of the Scheme, this will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced connectivity through the site. In addition, the above-named documents also include commitments to extensive buffering of woodlands/ancient woodlands, ponds, trees, and watercourses and will include habitat creation/management within these buffer zones. Thereby, resulting in extensive landscape-wide habitat provision for the benefit of all local species.
BEPS-216	Ecology and Biodiversity	Barbastelle bats make the whole Scheme ecologically exceptional The Applicant's own bat evidence is highly damaging to its case. The bat activity report records eleven records from the Norfolk Barbastelle Study Group relating to barbastelle maternity colonies within 2 km of the Order Limits, including Saxlingham Grove, Little Wood, Brooke Wood	The Applicant acknowledges the presence of barbastelle bat <i>Barbastella barbastellus</i> colonies surrounding the Order Limits and has considered the core sustenance zone (CSZ) within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].

ID	Theme	Representation	Applicant's Response
		and Tyrrels Wood, with overlapping colony zones covering the Scheme. It explains that woodland roosts depend on surrounding arable mosaics and linear features and that tracked maternity colonies typically range an average of 3.5 km, not beyond 5.5 km. The Ecology Chapter then goes further. It states that the whole Order Limits fall within the 6 km core sustenance zones of nine known barbastelle colonies and that the combined zones of several colonies cover the entire Order Limits. It also states that the Order Limits have national importance for bats, that barbastelle activity was high, that barbastelle was the third most abundant species recorded, and crucially that barbastelle was recorded at every sampled location across the survey area. This is not a normal bat constraint. It means the Scheme occupies a landscape that the Applicant itself has defined as nationally important for bats and functionally important to multiple maternity colonies of a rare Annex II species. The same bat documents identify priority hedgerows, woodland edges, ponds, ditches and floodplain habitats within and around the Order Limits as the structure used by bats. In those circumstances, fragmentation of hedgerows, industrialisation of field margins, lighting, construction disturbance, noise, vibration and repeated corridor crossings are not secondary matters. They go to the heart	The Order Limits primarily consist of intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular ploughing, tilthing, harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including barbastelle bat maternity roosts). Therefore, land utilised for the Scheme is currently subject to regular disturbance, with the proposals considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the Design Principles, Parameters and

ID	Theme	Representation	Applicant's Response
		of whether the development can be accepted at all. Outline mitigation and later habitat creation cannot credibly neutralise industrialisation of an already functioning barbastelle maternity landscape.	Commitments [APP-7.18] and illustrated on ES Volume 2, Figure 4.1 Indicative Masterplan [APP-059], include the retention and enhancement of field boundary features (hedgerows/ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including barbastelle bats. Of particular note, a minimum 15m buffer will be applied to woodland (non-ancient) and a minimum 30m buffer will be applied to all ancient woodland immediately adjacent to the Order Limits, with habitat creation and enhancement within these buffer zones. Thereby reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing lo enhanced supporting habitats surrounding woodland parcels for the benefit of barbastelle bats (if present), thereby contributing towards the species favourable conservation status. A

ID	Theme	Representation	Applicant's Response
			buffer zone of 10m will be delivered between hedgerows and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199]. The Applicant understands that further guidance will be published on bats and solar PV sites, as the Bat Conservation Trust are currently working with Natural Resources Wales to provide a comprehensive synthesis of the available evidence on the interactions between solar energy developments and bat populations. Therefore, currently, there is no wholly reliable evidence to suggest that solar PV sites present a potentially significant negative impact upon bats when cited within sub-optimal habitats. Nevertheless, as a precautionary measure, the embedded design principles include for minimum buffers

ID	Theme	Representation	Applicant's Response
			between habitats of value to barbastelle bats and solar PV apparatus. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199] . When considering the scale of the Scheme, this will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure.
BEPS-217	Ecology and Biodiversity	Natural England's 2024 Definition of Favourable Conservation Status for barbastelle Two further documents materially reinforce the objection. First, the Norfolk Barbastelle Study Group's January 2025 report shows that the East Pye Scheme area lies within or abuts the 6 km Core Sustenance Zones of at least six barbastelle maternity colonies, identifies a newly confirmed maternity colony at Little Wood near Shotesham, predicts additional maternity colonies in Brooke Wood and Lower Spring Wood, and states expressly that the impacts of East Pye Solar on barbastelles cannot be properly assessed	The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of representation. The results and detailed methodology of specific ecological surveys is presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160] , with

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		without a full understanding of barbastelle distribution and habitat use within the scheme area; it also warns that other woodlands within or close to the scheme area, especially at the east end, remain to be assessed. Second, Natural England's 2024 Definition of Favourable Conservation Status for barbastelle makes clear that barbastelle are a vulnerable, light-shy Annex II species closely associated with broadleaved woodland, veteran and dead trees, riparian habitats, hedgerows and treelines; that they avoid artificially lit areas, depend on large, well-connected dark landscapes, and that there is currently no known proven mitigation or compensation for loss of barbastelle woodland roosting habitat over the short to medium term. Natural England further states that existing and potential roost sites should be protected from disturbance and development, and that artificial lighting fragments habitat and impairs connectivity between colonies. These conclusions are reinforced by the 2023 Journal of Applied Ecology paper by Tinsley et al., which found in a paired study of 19 ground-mounted solar PV sites in southwest England that solar PV developments had a significant negative effect on bat activity, with six of eight taxa analysed showing reduced activity, including reduced activity along field boundaries for <i>Myotis</i> spp. and serotine and reduced activity in open fields for soprano pipistrelle and <i>Plecotus</i> spp.; the paper concludes that ground-mounted solar should be screened in Environmental Impact Assessments for ecological impacts and that, where	Appendix 8.5 and Appendix 8.6 specifically relating to bat surveys. An assessment of potential effects of the Scheme on bats during construction, operation, and decommissioning is set out within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The scope of assessment has also been agreed through the scoping and consultation process, as described in Section 8.2 of the Ecology and Biodiversity Chapter [APP-044] The Applicant acknowledges the presence of barbastelle bat colonies surrounding the Order Limits and has considered the core sustenance zone (CSZ) within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Applicant refers to the response to BEPS-216. With regard to the comment relating peer-reviewed research, the Applicant assumes that this comment is in relation to Tinsley et al., (2023), which claims to show a strong negative effect

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		important bat habitat is present, alternative siting in a less sensitive location may be more appropriate. Taken together, these documents are highly significant: they show not merely that barbastelles are present, but that East Pye Solar sits within an incompletely surveyed maternity-colony landscape of very high importance, and that the best available specialist evidence points away from reliance on generic buffers, outline mitigation or compensatory habitat creation and towards protection of dark, connected roosting and foraging habitat from development in the first place. The East Pye findings are also stronger than the Tinsley baseline because the taxa shown in the paper to be adversely affected are plainly represented on site. Appendix 8.6 records common pipistrelle, soprano pipistrelle, barbastelle, noctule, brown long-eared bat, Myotis species, Natterer's bat, serotine, Daubenton's bat, Nyctalus species and Nathusius' pipistrelle across the Order Limits, with barbastelle, brown long-eared bat, common pipistrelle and noctule recorded at every location and Myotis also effectively ubiquitous across the site. In other words, East Pye supports the very guilds and species groups that Tinsley found to be negatively affected by solar PV: open-space foragers (Nyctalus), edge and generalist species (Pipistrellus pipistrellus, P. pygmaeus, Eptesicus serotinus), clutter and edge-associated bats (Myotis spp.), and long-eared bats (Plecotus spp., represented here by	of Solar PV developments on foraging and commuting bats. However, there are several caveats which suggest that this study is not overly reliable (Do solar farms affect foraging & commuting bats? - BSG Ecology), and the findings of this study have been challenged. The Applicant understands that further guidance will be published on bats and solar PV sites, as the Bat Conservation Trust are currently working with Natural Resources Wales to provide a comprehensive synthesis of the available evidence on the interactions between solar energy developments and bat populations. Therefore, currently, there is no wholly reliable evidence to suggest that solar PV sites, present a potentially significant negative impact upon bats when cited within sub-optimal habitats. Nevertheless, as a precautionary measure, the embedded design principles include for minimum buffers between habitats of value to barbastelle bats and solar PV apparatus. These buffer zones will be

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		brown long-eared bat). The scientific risk identified in Tinsley is therefore not abstract or only tangentially relevant: it applies directly to the East Pye species assemblage.	managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199] . When considering the scale of the Scheme, this will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure.
BEPS-218	Ecology and Biodiversity	More importantly still, East Pye is not just any species-rich bat site. The Applicant's own Chapter 8 states that the Order Limits and surrounding landscape support nationally important assemblages of foraging and commuting bats and that the site is located within multiple barbastelle core sustenance zones for maternity roosts; it also acknowledges that the site is well connected to off-site woodland and wetland habitats and likely provides supporting features such as hedgerows, tree lines, mature trees and field margins used for foraging and commuting . Chapter 8 further identifies particularly sensitive areas, including Site 3 adjacent to Spring Wood, Hempnall CWS, a known barbastelle roost site and foraging area, and the eastern Saxlingham Grove / Shotesham-Woodton woods	The Applicant refers to its response to BEPS-217.

ID	Theme	Representation	Applicant's Response
		complex where barbastelle were most frequently detected within emergence periods. Appendix 8.6 records eleven NBSG maternity colony records within 2 km, with core roost zones overlapping the site for Saxlingham Grove, Spring Wood, Little Wood, Brooke Wood, Tyrrels Wood and others. This means East Pye is not just a farmed landscape with bats in it. It is a landscape-scale maternity support area for a rare Annex II species. In that context, a study showing that solar infrastructure reduces bat activity through habitat fragmentation becomes much more serious, because the consequence is not simply local disturbance but potential impairment of the functional landscape that underpins maternity colonies.	
BEPS-219	Ecology and Biodiversity	The best available peer-reviewed evidence now shows that ground-mounted solar can materially reduce bat activity through habitat loss and fragmentation, especially in the very kinds of boundary and open-field habitats present at East Pye. The East Pye surveys then show that the site supports a nationally important bat assemblage, with barbastelle recorded everywhere, and that the main infrastructure areas themselves are used by barbastelle and other sensitive taxa. In those circumstances, the Applicant cannot safely rely on a generic Outline LEMP, future habitat creation and biodiversity metric gains to claim that bat impacts are avoided or beneficial. The research points the other way: where solar infrastructure is proposed in proximity to important roosting and commuting landscapes, particularly for rare and disturbance-sensitive	The Applicant refers to its response to BEPS-217.

ID	Theme	Representation	Applicant's Response
		bats, the appropriate mitigation response is not generic enhancement after the event but avoidance and alternative siting at the outset. On the evidence presently available, East Pye Solar has not done that.	
BEPS-220	Ecology and Biodiversity	Ancient woodland, SSSI woods and irreplaceable habitats are a scheme-wide constraint The Applicant's own bat report states that there are 31 areas of Ancient Woodland Inventory woodland and four areas of lowland fen, totalling fourteen parcels, within 2 km of the Order Limits, and that these are irreplaceable habitats protected by the NPPF and the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. It also records that Shotesham-Woodton Hornbeam Woods SSSI shares boundaries with parcels 7F and 7H and that floodplain grazing marsh and lowland fen occur in and around the Scheme. The statutory and non-statutory sites mapping discussed elsewhere in this project shows that the Scheme sits in a dense conservation landscape of SSSI woods, County Wildlife Sites, meadow and fen systems, roadside reserves and woodland blocks. The Applicant's own desk study confirms that nine non-statutory sites fall within or adjacent to the red line boundary, including woodlands and fenland along Hempnall Brook. That matters because the issue is not limited to direct land take. Ancient woodland and lowland fen are highly sensitive to indirect effects and changes in setting: edge	The Applicant has avoided areas of ancient woodland and other irreplaceable habitat by confining the PV areas to arable farmland which has a lower biodiversity value. In addition, buffers which have been set out in Design Principles, Parameters and Commitments [APP-213] will avoid direct and indirect impacts to these sensitive sites. Safeguards which will be followed during construction and presented in the Outline CEMP [APP-196] will avoid direct impacts associated with pollution, run-off, dust deposition, noise, and drilling activities. The Applicant highlights the benefits to biodiversity across the landscape though the schemes commitment to Biodiversity Net Gain set out in the Biodiversity Net Gain Report [APP-218], which includes the strengthening and creation of existing and new

ID	Theme	Representation	Applicant's Response
		effects, hydrological change, shading, dust, lighting, noise, fragmentation and altered surrounding land use. In a landscape already shown by the Applicant to be nationally important for bats and dense with priority habitats, these indirect effects are particularly serious. Again, the correct mitigation-hierarchy response is avoidance, not encirclement by development plus generic buffers.	hedgerows, tree planting, grassland management and pond creation. These benefits form part of the wider Green Infrastructure Strategy included in the Outline LEMP [APP-199] which will serve to link these important sites.
BEPS-221	Ecology and Biodiversity	Dense Network of Statutory and Non-Statutory Sites Confirms the Sensitivity of the East Pye Landscape Figures 8.2 and 8.3 show that East Pye Solar is not located in an isolated or low-sensitivity agricultural area. On the contrary, the Order Limits sit within a dense and overlapping network of statutory and non-statutory ecological sites. The statutory sites figure shows multiple designated sites within 5 km, including SSSIs, an SAC and Local Nature Reserves, such as Shotesham-Woodton Hornbeam Woods SSSI, Flordon Common SSSI and SAC, Hedenham Wood SSSI, Sexton Wood SSSI, Fritton Common SSSI, Pulham Market Big Wood SSSI, Tindall Wood Ditchingham SSSI, and Broome Heath Pit SSSI and Broome Heath LNR. The non-statutory sites figure adds a further and equally important layer, showing numerous County Wildlife Sites and Roadside Nature Reserves distributed around and between the site parcels and cable route. These include, among others, Spring Wood Hempnall CWS, Saxlingham Grove CWS, Popes Wood CWS, Doyly's Grove CWS,	Embedded design principles are detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. These include a 30m standoff distance from ancient woodlands, at least 15m from woodlands, 10m from watercourses, and a minimum of 10m buffer between hedgerows/ditches and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as

ID	Theme	Representation	Applicant's Response
		Fritton Grange Meadows CWS, Tyrrel's Wood and New Plantation CWS, Brooke Wood CWS, Beckett's Wood CWS, Green Man Lane Kirstead CWS and Seething Observatory CWS, together with numerous Roadside Nature Reserves. These figures materially strengthen the ecology objection for several reasons. First, they confirm that the Scheme lies within a highly connected ecological matrix rather than a simple expanse of ordinary arable land. The designated sites are spread throughout the surrounding landscape, often closely adjacent to the Order Limits, and form a mosaic of woods, meadows, commons, verges and associated habitats. This directly supports the concern that the ecological function of the area depends on landscape connectivity, not merely on the value of individual habitat parcels.	detailed within the Outline LEMP [APP-199]. When considering the scale of the Scheme, this, will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced connectivity through the site. In addition, the above-named documents also include commitments, to extensive buffering of woodlands/ancient woodlands, ponds, trees, and watercourses and will include habitat creation/management within these buffer zones. Thereby, resulting in extensive landscape-wide habitat provision for the benefit of all local species.
BEPS-222	Ecology and Biodiversity	Second, the mapped pattern strengthens the case on bat connectivity and fragmentation, especially for barbastelle. The surrounding network of woodland sites, verges and wildlife sites corresponds closely to the kind of connected rural structure relied upon by commuting and foraging bats. In that context, the fragmentation of hedgerows, repeated cable corridor crossings, highway works, lighting and other infrastructure impacts cannot be treated as minor or	The Applicant refers to its response to BEPS-064.

ID	Theme	Representation	Applicant's Response
		localised. They risk affecting a wider ecological network extending well beyond the red line. Third, these plans undermine any suggestion that the baseline is of relatively low ecological importance and can readily be compensated through generic habitat creation or management. The scheme is embedded within an already receptor-rich and conservation-significant landscape. This weakens the credibility of both the BNG case and the OUTLINE LEMP, which rely heavily on the idea that broad habitat enhancement can offset scheme effects. Fourth, the density of nearby designated sites materially strengthens the case on cumulative and in-combination effects. Impacts such as dust, lighting, disturbance, hydrological change, habitat fragmentation and construction effects are not occurring in a blank landscape. They arise within a setting already rich in sensitive ecological receptors. The threshold for a precautionary assessment should therefore be lower, and reliance on generic or outline mitigation correspondingly less acceptable. Accordingly, Figures 8.2 and 8.3 support the conclusion that East Pye Solar is proposed within a highly sensitive and interconnected conservation landscape. This materially reinforces concerns about habitat fragmentation, bat commuting and foraging routes, landscape-scale ecological function, cumulative effects, and the inadequacy of generic outline mitigation. The Applicant's ecological	

ID	Theme	Representation	Applicant's Response
		assessment should therefore be approached on the basis that this is a receptor-dense landscape where even apparently limited interventions may have wider and more significant effects than the ES acknowledges.	
BEPS-223	Ecology and Biodiversity	Failure to Assess Hedgerow Network Fragmentation and Bat Connectivity The Applicant's Hedgerow and Tree Protection Order Plan demonstrates that the Scheme will result in extensive and repeated intervention within the existing hedgerow and tree network across the Order Limits. The plan shows numerous locations where hedgerows are intersected by cable corridors, access routes, haul roads, and highway works, resulting in breaks, truncations, and edge encroachment across what is currently a continuous and well-connected field boundary system. This is a matter of fundamental ecological importance. The Environmental Statement confirms that the Order Limits support a bat assemblage of national importance, with barbastelle recorded at every survey location and identified as the third most abundant species. Barbastelle are an Annex II species, highly sensitive to habitat fragmentation, artificial lighting, and disturbance, and are critically dependent on continuous linear features such as hedgerows and woodland edges for commuting and foraging. The integrity	The Applicant refers to its response to BEPS-064 which provides details on stand-off distances from hedgerows and highlights the Outline LEMP [APP-199] which provides details on the long-term management of hedgerows to enhance their structural integrity and botanical diversity to promote ecological function. Furthermore the Biodiversity Net Gain report [APP- 218] demonstrates that the project has the potential to deliver 290.03 hedgerow units, an increase in 31.35% from the current baseline. The overall improvement to hedgerow extent and function, as well as more sympathetic long-term management will convey benefits to both commuting and foraging bats. While it is acknowledged that there will be hedgerow loss during construction, this will be temporary, with gaps to

ID	Theme	Representation	Applicant's Response
		of this network is therefore central to the ecological function of the site. Despite this, there is no assessment within the ES of the functional impact of hedgerow severance and fragmentation. In particular: • There is no identification or mapping of key commuting routes for bats, including barbastelle; • There is no assessment of connectivity loss, including the effects of repeated hedgerow breaks across parcels and along the cable corridor; • There is no analysis of gap distances, edge effects, or the time required for reinstated hedgerows to become functionally equivalent; • There is no consideration of the cumulative effect of multiple crossings and disturbances across the wider landscape network; • There is no integration of this plan with bat-specific mitigation, including the provision of continuous dark corridors. The plan instead relies implicitly on the assumption that hedgerows can be disturbed, removed, or reinstated without material ecological consequence. That assumption is unsupported and contrary to best practice. Replanted or reinstated hedgerows typically take many years to develop the structural complexity required for use by commuting	facilitate access being reduced in width as much as possible, as well as reinstatement being undertaken on completion of works. That by far the majority of hedgerows will be retained as part of the Scheme it is unlikely that it will impact bat flight lines.

ID	Theme	Representation	Applicant's Response
		bats, and even temporary breaks in connectivity can disrupt established movement patterns, particularly for light-averse species such as barbastelle.	
BEPS-224	Ecology and Biodiversity	Furthermore, the plan does not assess the construction-phase degradation of hedgerow function, including the effects of lighting, noise, vibration, and adjacent ground disturbance. Hedgerows located alongside haul routes or construction corridors will be subject to significant edge effects and disturbance, further reducing their suitability as commuting features even where physically retained. The cable route is of particular concern. It forms a continuous linear corridor intersecting multiple parcels and hedgerow networks, creating a scheme-wide fragmentation pathway. No assessment has been undertaken of the ecological implications of this corridor for bat movement or landscape connectivity. This results in a clear internal contradiction in the Applicant's case. The Scheme relies on the presence of a well-connected landscape to support its conclusion of high ecological value and national importance for bats, yet proposes works that would systematically disrupt that same network without proper assessment or secured mitigation. In policy terms, this represents a failure to comply with NPS EN-1 (2023), which requires that mitigation measures are clearly defined, secured, and demonstrably effective.	The Applicant refers to its response to BEPS-221 and BEPS-223. With regards to edge effects the hedgerows tend to border agricultural fields which are subject to ploughing, sowing, and harvesting throughout the year, some of which are carried out at night. There is also no standoff distance from hedgerows during normal agricultural processes unlike what is proposed for the Scheme. The Outline CEMP [APP-196] provides a number of measures which will be implemented during construction to reduce disturbance and protect hedges and their ecological function (stand-off distances, avoidance areas, supervision by an Ecological Clerk of Works). The measures set out in the CEMP will also be adopted during the establishment of the cable route.

ID	Theme	Representation	Applicant's Response
		Here, mitigation is neither specified at a level sufficient to assess effectiveness, nor secured in a way that ensures the maintenance of functional habitat connectivity. The approach instead relies on generalised and deferred measures, which is inconsistent with established principles that mitigation must not be left to post-consent design where it is necessary to establish the acceptability of the scheme.	
BEPS-225	Ecology and Biodiversity	Accordingly, the Applicant has failed to properly assess or mitigate a fundamental ecological impact arising from the fragmentation of hedgerow networks. This omission is particularly significant given the confirmed presence of a nationally important bat assemblage and the ubiquitous distribution of barbastelle across the Order Limits. The ES therefore does not provide a robust or lawful assessment of effects on bat commuting and foraging behaviour, nor does it demonstrate that adverse effects can be avoided or adequately mitigated. The Hedgerow and Tree Protection Plan demonstrates that the Scheme will result in widespread severance and disturbance of hedgerow habitats that are treated within the BNG metric as retained and enhanced. This indicates that the baseline and post-development habitat condition assumptions are inaccurate, that temporal losses and connectivity impacts have not been properly accounted for, and that the claimed biodiversity net gain is likely to be overstated and not deliverable in practice.	The Applicant refers to its response to BEPS-221.

ID	Theme	Representation	Applicant's Response
BEPS-226	Ecology and Biodiversity	Chalk streams, hydrological connectivity and aquatic ecology are not capable of being screened away The aquatic evidence reinforces the same conclusion. The Applicant's Ecology Chapter notes that the River Tas is a chalk stream priority habitat and a focus of Environment Agency activity. The aquatic habitat assessment records that key construction risk pathways at crossing points include sediment release, increased turbidity, accidental pollution from fuels and cementitious materials, temporary alteration of flow pathways or drainage function, and barrier effects or bank damage caused by working corridors. It also states that fish and dissolved oxygen/phosphate are already failing quality elements in parts of the hydrologically connected River Tas waterbody and that any works must avoid deterioration under WFD principles. The same appendix relies on hydrologically connected downstream sites to infer fish and invertebrate assemblages, and confirms that extensive ditch networks and culverting may influence hydrological connectivity and fish movement. The Ecology Chapter itself accepts diverse aquatic macroinvertebrate assemblages in nearby connected watercourses and says that sensitive taxa are likely to occur in flowing sections of Hempnall Beck and principal tributaries. This is not the picture of a trivial drainage environment. It is a connected aquatic system with chalk-stream sensitivity,	The Applicant refers to its response to BEPS-083 and BEPS-087.

ID	Theme	Representation	Applicant's Response
		downstream WFD vulnerability and acknowledged source–pathway–receptor links. Yet the aquatic appendix is not a full species survey and repeatedly depends on habitat inference and connected-site data.	
BEPS-227	Ecology and Biodiversity	White-clawed crayfish sensitivity is real and the Applicant's baseline is not sufficient The white-clawed crayfish issue alone should have triggered a much more precautionary approach. The Ecology Chapter records an Environment Agency white-clawed crayfish record approximately 6 km downstream on the River Tas and historic occurrence within the wider catchment. It accepts that appropriate biosecurity, pollution prevention and sediment control measures are needed to safeguard downstream habitats. The aquatic appendix then says there were no records within a 2 km search radius and no field signs during the surveys, but it also accepts that white-clawed crayfish is legally protected, that wider strategy documents identify populations in Norfolk, and that habitat modification and sedimentation are among the main threats. It expressly states that absence of signs during a walkover survey does not confirm absence and that, given the broader catchment context, robust biosecurity, pollution prevention and sediment management are required to avoid disease	The Applicant refers to its response to BEPS-087.

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		introduction or degradation of potential downstream habitat. BEPS has confirmed survey evidence from Norfolk Rivers Trust of white-clawed crayfish in the Tas within 2KM of the scheme, which it shared with East Pye Solar pre-application. That makes the issue materially sharper. Once there is direct evidence of white-clawed crayfish sensitivity in the receiving chalk-stream system, a precautionary regulator cannot simply accept a walkover-based absence inference within parts of the Order Limits as enough to downplay the risk. The correct mitigation-hierarchy response is to avoid works that create sediment, pollution, connectivity and disease-risk pathways into that system.	
BEPS-228	Ecology and Biodiversity	The aquatic baseline is limited, dry-condition biased and incomplete The Applicant's aquatic assessment contains significant limitations that prevent reliance on its reassuring conclusions. It says the appraisal is habitat-led; no macroinvertebrate sampling was undertaken; and several surveyed ditches and headwaters were episodic or ephemeral during dry conditions. The appendix nonetheless relies on connected-site data and habitat-based indications to infer likely assemblages. That is not a reliable basis for screening out impact in a complex chalk-stream catchment where breeding white-clawed crayfish are known to be present. Dry-condition survey work tends to suppress the apparent importance of	The Applicant refers to its response to BEPS-083.

ID	Theme	Representation	Applicant's Response
		ephemeral headwaters, ditches, wet margins and seasonal connectivity. Yet those are precisely the pathways through which pollutants, sediments, disease vectors and hydrological changes can move through the landscape. A baseline built on dry-condition habitat appraisal and inference cannot justify confidence that harm can be managed rather than avoided.	
BEPS-229	Ecology and Biodiversity	Farmland birds, field margins and stewardship-type habitats are part of the ecological network East Pye Solar's ecological desk study states that fields, hedgerows and grassland margins across the Order Limits provide nesting and foraging opportunities for red and amber listed farmland birds and LBAP species including skylark, turtle dove, corn bunting and reed bunting. This is important because the Scheme's field-margin and boundary works are not ecologically neutral. They affect exactly the habitats that support farmland bird breeding and feeding ecology. BEPS has already identified significant stewardship-managed land and bird records within the Scheme area. The Applicant's own habitat survey confirms that these margins, hedges and ditch edges are ecologically active features, not spare land for engineering adjustments. This again reinforces the inadequacy of proceeding without a full botanical and edge-habitat survey base and the	The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of representation. The results and detailed methodology of specific ecological surveys is presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160], with Appendix 8.4 relating to breeding bird surveys. Turtle dove and grey partridge were recorded during breeding bird surveys, but not as a suspected breeder. Lapwing was also recorded, but not as a confirmed breeding species. The only confirmed open ground nesting species recorded was skylark. As a

ID	Theme	Representation	Applicant's Response
		inadequacy of treating road widening and margin works as minor matters. Despite land in the scheme having been included in the Country-Side Stewardship Scheme Specifically for the conservation of ground-nesting birds such as lapwing, skylark and turtle doves, there is only mitigation included in the scheme for skylarks. Evidence from Gwent Wildlife Trust showed that mitigation for lapwing at the Gwent Levels solar farm failed and that the lapwing left the area entirely. This is a risk in our area.	result, a skylark mitigation strategy is detailed in Outline LEMP [APP-199]. An assessment of potential effects of the Scheme on ground nesting farmland birds during construction, operation, and decommissioning is set out within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The scope of assessment has also been agreed through the scoping and consultation process, as described in Section 8.2 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].
BEPS-230	Ecology and Biodiversity	Other receptors reinforce the same conclusion The same desk study and survey material confirms suitability for otter, water vole, great crested newt, reptiles, invertebrates, badger, brown hare and hedgehog. It also records invasive species issues including giant hogweed, Himalayan balsam and Japanese knotweed. These are not the main reasons this Scheme should be refused, but they reinforce the central point: East Pye Solar is proposed across a complex and already functioning ecological system. The more receptors there are, the weaker the credibility of generic outline mitigation.	The Applicant refers to its response to BEPS-212.

ID	Theme	Representation	Applicant's Response
BEPS-231	Ecology and Biodiversity	The Outline LEMP and BNG cannot rescue a fundamentally misplaced scheme East Pye Solar seeks to rely on the Outline LEMP and BNG as embedded enhancement. It also claims substantial net gains in habitats, hedgerows and watercourses. But those claimed gains do not answer the real issue here. BNG is a metric-based habitat accounting exercise. It does not demonstrate that a nationally important barbastelle landscape, a connected chalk-stream system, rare botanical margins, ancient woodland and grassland settings, irreplaceable habitats and a receptor-dense field-boundary network can be industrialised without unacceptable harm. This is precisely why the mitigation hierarchy exists. Compensation and enhancement cannot be used to legitimise a development that should have been avoided in the first place, especially where there is neither site-specific nor regional need for it.	The Applicant refers to its response to BEPS-212.
BEPS-232	Ecology and Biodiversity	Habitats Regulations implications The Shadow HRA recognises that where a project is likely to have a significant effect on a European site, Appropriate Assessment is required, and that the HRA process begins with screening followed by Appropriate Assessment if likely significant impact is identified. Given the Applicant's own evidence of landscape-scale barbastelle maternity connectivity, hydrologically connected	The Applicant would refer the reader to the Shadow Habitats Regulations Assessment [AS-036] which sets out screening and provides a justification why proceeding to Stage 2 Appropriate Assessment is not necessary given the absence of likely significant effects.

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		chalk-stream pathways, and incomplete aquatic and botanical baseline evidence, the ecological case for screening out likely significant effects is not robust. Even leaving aside the separate detailed HRA objections, the ecology evidence alone demonstrates a degree of uncertainty and pathway complexity inconsistent with any confident no-LSE position.	The HRA process relates to qualifying species of the European designated sites and takes account of the pressures and threats to each.
BEPS-233	Ecology and Biodiversity	Why avoidance is the only policy-compliant outcome The cumulative picture is clear. East Pye's own documents show: • a continuous matrix of priority habitats across the Scheme footprint • national importance for bats, with barbastelle the third most abundant species and present at every sampled location • multiple nearby barbastelle maternity colonies and core sustenance zones covering the whole Order Limits • ancient woodland, lowland fen and other irreplaceable habitats in close relation to the Scheme • a chalk-stream priority habitat and hydrologically connected aquatic system with identified pollution and sediment pathways • white-clawed crayfish sensitivity in the River Tas system, with BEPS also holding Norfolk Rivers Trust	The Applicant refers to its response to BEPS-083 and BEPS-087. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.

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		survey evidence from the Tas within 2KM of the scheme - no full botanical survey despite credible expert concern about rare plant assemblages in the very field margins and verge habitats threatened by road widening and associated works - habitat-led rather than full survey assessment in important areas of aquatic ecology and botany In a scheme of this scale, those are not loose ends. They show that the development has been brought forward in the wrong place. Once that is accepted, the policy answer follows. Avoidance is the first and highest step in the mitigation hierarchy. Here, avoidance means not industrialising this ecological landscape at all. Because the Scheme has not done that, and because later-stage mitigation and BNG cannot lawfully substitute for avoidance, the Scheme conflicts with EN-1, EN-3, EN-5 and the NPPF and should be recommended for refusal.	
BEPS-234	Ecology and Biodiversity	Conclusion East Pye Solar is proposed across a highly sensitive and interconnected ecological landscape. The Applicant's own evidence demonstrates nationally important bat sensitivity, priority habitat saturation, irreplaceable habitat proximity, chalk-stream and aquatic vulnerability, and an incomplete survey baseline, particularly for botany. On the Applicant's own policy basis, these circumstances require avoidance.	The Applicant refers to its response to BEPS-083 and BEPS-087. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.

ID	Theme	Representation	Applicant's Response
		The Scheme has not avoided them. It should therefore be recommended for refusal on ecology and biodiversity grounds. Remedies sought In light of the scale of ecological sensitivity, the inadequacy of the survey baseline, the unresolved risks to barbastelle maternity landscapes, white-clawed crayfish and chalk-stream systems, the absence of a lawful and robust botanical assessment, and the Scheme's conflict with the mitigation hierarchy in EN-1, EN-3, EN-5 and the NPPF, BEPS requests that the Examining Authority recommend refusal of development consent on ecology and biodiversity grounds. In the alternative, if the application is not recommended for refusal at this stage, BEPS requests that the Examining Authority find that the ecological information presently before it is insufficient to lawfully conclude that significant effects have been properly identified, assessed and mitigated, and require substantial further work before any recommendation is made. That further work should include, at a minimum, full season botanical surveys by suitably qualified specialists across all operational sites, cable corridors, road widening areas and field margins; a revised and fully integrated assessment of bats, including barbastelle maternity colony function, commuting routes, lighting, noise and habitat fragmentation; direct survey and precautionary assessment of white-clawed crayfish and connected aquatic receptors across the River Tas and associated catchments; and a revised ecology chapter,	

ID	Theme	Representation	Applicant's Response
		HRA and BNG assessment based on avoidance rather than reliance on outline mitigation and compensatory habitat creation.	
BEPS-235	Biodiversity Net Gain	8.17 Biodiversity Net Gain does not demonstrate ecological acceptability The Applicant relies on the Biodiversity Net Gain Report to claim substantial biodiversity gains across habitat, hedgerow and watercourse units, including 37.42% habitat gain, 31.35% hedgerow gain and 16.08% watercourse gain across the Order Limits. The report presents this as evidence that the Scheme delivers a measurable and favourable biodiversity outcome. That claim is not reliable when tested against the actual ecological sensitivity of the landscape impacted by East Pye Solar. The problem is not simply one of detail. It is that the BNG assessment applies a habitat-unit metric to a site whose significance depends on ecological function, species behaviour, hydrological sensitivity and landscape connectivity. Those matters sit at the heart of the East Pye ecology case, yet they are not properly captured by the BNG metric.	In line with the Environment Act 2021, the Biodiversity Net Gain metric is a well-established tool to quantify habitats and has been used as such to demonstrate a minimum 10% net gain across the Site. The biodiversity gains across the habits, hedgerows and watercourses presents the output from the statutory metric in tandem with an assessment on the assessment of other important ecological features (IEF) within the Site. The assessment of the IEFs within the Site is presented within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] .
BEPS-236	Biodiversity Net Gain	The BNG metric does not assess the ecological functions that make this site sensitive The BNG assessment measures habitats as metric units and expressly relies on habitat retention, enhancement and creation shown in the Outline LEMP and Green	The Applicant refers to its response to BEPS-235.

ID	Theme	Representation	Applicant's Response
		Infrastructure Strategy. It does not assess the ecological functions that are central to this Scheme, including bat commuting and foraging networks, dark corridors, species movement across the wider landscape, hydrological dependency, or the viability of protected and priority species populations. That is especially important here because East Pye Solar is not an ordinary arable site of low ecological complexity. Across the ecology evidence already submitted, the Order Limits fall within a nationally important bat landscape, including widespread barbastelle activity and overlapping colony support zones. The bat survey itself records barbastelle throughout the Order Limits and acknowledges that the bat assemblage reaches national importance, while also stating that its assessment is based on presence only and that population-level importance could in reality be higher. In those circumstances, a habitat-unit metric cannot be treated as an adequate proxy for actual ecological effect.	

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BEPS-237	Biodiversity Net Gain	Existing habitats are artificially undervalued, while proposed habitats are inflated A major weakness in the BNG assessment is its treatment of strategic significance. The report states that all baseline habitats are assigned low strategic significance, while certain proposed post-development habitats are assigned high strategic significance if they align with LNRS opportunity mapping. This produces an artificial uplift in the post-development side of the ledger. That approach is particularly problematic at East Pye because the existing landscape is already functioning as a sensitive ecological network. It is an ancient landscape and has already been managed for conservation under the Countryside Stewardship Scheme. The current habitat mosaic supports protected bats, priority farmland birds, riparian habitats, ancient woodland interfaces and species-rich boundaries. To treat that existing landscape as of low strategic significance, then award elevated significance to newly created habitats simply because they correspond to LNRS opportunity categories, risks materially overstating gain and understating loss – this is particularly the case where loss would be to European Protected Species, SSSIs and the ecology surrounding ancient woodland. In practical terms, the metric rewards replacement habitat while failing to reflect the actual strategic importance of the habitat system that would be damaged.	An assessment of potential effects of the Scheme on bats during construction, operation, and decommissioning is set out within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The scope of assessment has also been agreed through the scoping and consultation process, as described in Section 8.2 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Applicant followed the latest guidance related to assigning Strategic Significance following the publishing of an LNRS within the relevant authority boundary. The guidance, and how it has been applied is provided within the Biodiversity Net Gain Report [APP-218].

ID	Theme	Representation	Applicant's Response
BEPS-238	Biodiversity Net Gain	The BNG baseline does not reflect species-specific ecological reality The BNG report reduces the baseline largely to habitat groups such as cropland, grassland, woodland, scrub and watercourses. For the Sites, cropland alone accounts for 942.66 hectares, with grassland at 95.10 hectares and relatively small amounts of woodland, wetland and lakes. That may be a legitimate metric categorisation, but it does not reflect the real ecological value of the site for species that depend on management, spatial arrangement and landscape function rather than on broad habitat labels. It also does not recognise that this is ancient woodland and ancient grassland – irreplaceable habitats – and that field margins and lane verges also currently function as areas of ecological importance. That is especially true for farmland birds. The report expressly states that skylark mitigation is only a relatively nominal area and has limited effect on whether the Scheme achieves 10% BNG. That exposes the structural weakness of the metric in this case. The site includes land managed under Countryside Stewardship specifically for species such as skylark, lapwing and turtle dove. Those species do not respond to the land merely as generic 'cropland' or 'grassland'. They depend on species-specific habitat structure, open sightlines, nesting conditions, disturbance levels and continuity of management. The BNG metric systematically undervalues such land because low-distinctiveness cropland can be replaced easily on	The Statutory Metric which is a recognised proxy measure for biodiversity is a widely used, and acceptable tool, used in England. The Biodiversity Net Gain Report [APP-218] and accompanying Statutory Metric [APP-219] provides more detail on the methodology, assessment of baseline habitat condition, the assigning of baseline habitats to levels of strategic significance (as per the LNRS), and the proposed post development condition of newly created and enhanced habitats. However, the BNG report is not a substitute for species mitigation, with this being presented in both the Outline OEMP [APP-197] and Outline LEMP [APP-199] with the latter providing detail on skylark mitigation. In their Relevant Representation, Natural England [RR-1410] welcomed the commitment made to deliver a minimum of 10% and did not raise issues of reliability to species present,

ID	Theme	Representation	Applicant's Response
		paper even where the real species-specific function cannot be recreated within an industrial solar landscape.	fragmentation, lighting or water course assessments.
BEPS-239	Biodiversity Net Gain	The BNG assessment does not address fragmentation, lighting, disturbance or barrier effects The BNG document treats the BESS, substations and permanent access infrastructure as urban or artificial land uses within the metric. But it does not assess the ecological effects that those elements may produce beyond simple habitat conversion, including fragmentation, barrier effects, noise, lighting, reflective effects, or severance of movement corridors. This matters acutely at East Pye because the ecology concerns are not confined to direct habitat take. They include disturbance pathways affecting bats, especially barbastelles, as well as disruption to movement and connectivity across hedgerows, woodland edges, riparian features and dark rural corridors. A positive habitat-unit outcome does not demonstrate that these impacts have been avoided or mitigated. On the contrary, the BNG framework is simply not designed to answer those questions.	The Applicant refers to its response to BEPS-238. The purpose of the BNG Assessment is to assign values to habitat which reflect their biodiversity value – not to address fragmentation, lighting, disturbance nor barrier effects. Such impacts are considered as necessary within ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044].
BEPS-240	Biodiversity Net Gain	Watercourse gains do not demonstrate protection of the River Tas system The report claims a 16.08% gain in watercourse units. But the watercourse annex shows that the baseline condition of many reaches is only fairly poor or poor, that major riparian	The Applicant refers to its response to BEPS-238. With respect to white clawed crayfish, the reader may consult ES Volume 1, Chapter 8 - Ecology and

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		encroachment is widespread, and that proposed 'enhancement' often does not improve the condition class at all. In several cases, the gain arises from removing or reducing riparian encroachment and reclassifying strategic significance rather than from restoring actual channel condition. The annex expressly states that none of the condition scores increased to the next class. That is highly relevant in this landscape. The key issue is not whether a watercourse metric can be improved through margins and buffer strips, but whether the Scheme can avoid harm to chalk stream tributaries, associated hydrological pathways and aquatic receptors. The BNG watercourse calculation does not amount to a Water Framework Directive assessment, does not establish no deterioration, and does not address species-specific risks such as those arising to white-clawed crayfish or to the broader River Tas catchment. A claimed watercourse gain under the metric therefore does not demonstrate ecological safety.	Biodiversity [APP-044] which provides the results of the desk study and the absence of any white clawed crayfish records close to the Scheme.
BEPS-241	Biodiversity Net Gain	The assessment relies heavily on assumptions and future management The BNG report states that the outcome is based on baseline surveys together with assumptions in the report, the Outline LEMP, the Green Infrastructure Strategy and the Hedgerow Removals Plan. It also states that no specific BNG consultation occurred. That is an important weakness. The ecological sensitivity of this scheme	The Applicant refers to its response to BEPS-238.

ID	Theme	Representation	Applicant's Response
		required the assumptions behind the metric to be transparently tested, especially where the Applicant seeks to rely on BNG as evidence of policy compliance and ecological benefit. There is also a further structural problem. The Outline LEMP says that a future BNG Strategy will be prepared to secure how the Scheme will achieve a minimum 10% net gain. That means the present application relies on a metric outcome generated from outline measures whose detailed delivery is still deferred. For an ecologically contentious scheme, that is not a secure basis on which to conclude that biodiversity gain will in fact be achieved, still less that ecologically sensitive features will be protected in functional terms.	
BEPS-242	Biodiversity Net Gain	The BNG case does not resolve decommissioning or repowering risk The BNG report is prepared for a scheme that includes construction, operation, maintenance and decommissioning. Yet the claimed gains depend on long-term habitat establishment and management. Elsewhere in the application, the scheme acknowledges operational replacement activity and eventual decommissioning. That raises an obvious question: whether habitats relied upon to generate BNG units will be disturbed, reset or removed during repowering and decommissioning phases. South Norfolk Council had already sought clarity on which	The Applicant refers to its response to BEPS-238.

ID	Theme	Representation	Applicant's Response
		habitats would remain post-decommissioning and indicated that some should be retained. That point remains fundamental. A temporary gain in metric units does not amount to a durable ecological gain if the habitat is liable to be damaged or removed at later phases of the scheme. The BNG case is therefore materially incomplete unless read alongside a secure whole-life ecological assessment, which has not been provided in a sufficiently robust form.	
BEPS-243	Biodiversity Net Gain	Conclusion on BNG The BNG report may show a positive result within the Defra metric, but it does not demonstrate that the Scheme is ecologically acceptable. The metric outcome is generated by a framework that does not assess species viability, landscape-scale bat function, hydrological sensitivity, disturbance pathways, fragmentation or the full value of existing stewardship-managed farmland habitats. It also appears to inflate gains by assigning low strategic significance to existing habitats while elevating the significance of proposed habitats that fit LNRS opportunity mapping. Accordingly, the Applicant cannot rely on the BNG report as evidence that ecological harm has been avoided, that protected species impacts are mitigable, or that the Scheme delivers a genuine net ecological benefit in this highly sensitive landscape. At East Pye Solar, a positive	The Applicant refers to its response to BEPS-238.

ID	Theme	Representation	Applicant's Response
		metric outcome does not answer the real ecological questions.	
BEPS-244	Outline Landscape and Ecology Management Plan	Objection to the Outline Landscape and Ecology Management Plan The Outline Landscape and Ecology Management Plan is not a secured, effective mitigation package. It is expressly an outline framework based on a preliminary design, with 'all details subject to further work and stakeholder engagement', and with the actual LEMP to be prepared later and approved pursuant to a DCO Requirement. The later document is intended to provide the detailed locations, species, sizes, planting densities, timetables, maintenance schedules and monitoring prescriptions for the landscape planting and ecological measures. That approach is not adequate for this scheme. East Pye Solar is not a low-sensitivity site where broad framework mitigation can safely be left to post-consent refinement. The ES itself says the Order Limits and surrounding landscape support a nationally important bat assemblage, with barbastelle recorded across all sample locations and the site lying within multiple core sustenance zones for maternity roosts. It also states that the site functions through hedgerows, tree lines, mature trees and field margins used for foraging and commuting. Against that background, mitigation has to be specific, fixed and demonstrably effective before consent is granted. This OUTLINE LEMP is not.	The Outline LEMP [APP-199] establishes a framework for the Scheme, with all details subject to further work and stakeholder engagement post consent. The Outline LEMP is supported by the Green Infrastructure Strategy [AS-005], which provides detail on the proposed landscape and ecological measures across the Scheme. A final LEMP will be prepared prior to implementation of the Scheme and will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032]. The LEMP will include: • The detailed landscape proposal plans to identify the location, number, species, size, and planting density of any proposed landscape planting and ecological measures. • Landscape planting specification including, cultivation, importing of materials and other operations to

ID	Theme	Representation	Applicant's Response
			ensure landscape planting establishment. • Implementation timetables for all landscape planting and ecological measures. • Management and maintenance timetables for all landscape planting and ecological measures. • Monitoring prescriptions for all landscape planting and ecological measures.
BEPS-245	Outline Landscape and Ecology Management Plan	The document is expressly incomplete The OUTLINE LEMP repeatedly states that it is only a framework. The later LEMP is meant to supply the actual detailed proposal plans, species lists, planting densities, implementation timetables, management timetables and monitoring prescriptions. In other words, the details that determine whether mitigation works are not yet settled. That is particularly problematic where the application relies on the OUTLINE LEMP to support: ecological mitigation in Chapter 8, which says the Outline LEMP 'summarises the principles' for landscape and ecology mitigation and enhancement	The Applicant has provided a coherent strategy for post-consent landscape scale mitigation. The Outline LEMP [APP-199] will form the basis of the post consent strategy.

ID	Theme	Representation	Applicant's Response
		the BNG assessment, which says its headline gains are based on the Outline LEMP, the hedgerow removals plan, the green infrastructure strategy and 'assumptions described in this assessment So, the application is using an outline document and future assumptions to support present conclusions on mitigation and net benefit.	
BEPS-246	Outline Landscape and Ecology Management Plan	EN-1 requires mitigation to be secured and effective The current EN-1 says applicants are encouraged to present biodiversity metric data in full as part of the application, and that the Secretary of State should use requirements and/or planning obligations to mitigate harmful aspects of development and, where possible, ensure conservation and enhancement of biodiversity. That policy does not support a position where the critical content of mitigation is left for later. Here, the OUTLINE LEMP does not itself secure the detailed ecological design; it postpones it. Nor does it demonstrate that the measures will be effective for the receptors that matter most on this site, especially bats, farmland birds, water-dependent ecology and species-rich margins.	The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Failure to comply with a Requirement of a DCO is a criminal offence.
BEPS-247	Outline Landscape and Ecology Management Plan	The OUTLINE LEMP is too generic for the actual ecological sensitivity of the East Pye landscape The table of contents shows a standard suite of measures: woodland, linear tree belts, scrub, hedgerows, pollinator planting, tussocky grassland, neutral grassland, modified	The Outline LEMP [APP-199] will form the basis of the post-consent LEMP. The Applicant has considered impacts to host of receptors in ES Volume 1,

ID	Theme	Representation	Applicant's Response
		grassland, habitat boxes, skylark mitigation, ghost ponds and arable field margins. Those may be useful tools in principle, but the problem is that they are generic habitat-management measures being deployed in a landscape whose key sensitivities are functional and species-specific. The site-wide ecology problem is not simply a shortage of habitat categories. It is the likely disruption of a functioning clayland mosaic used by barbastelles across hedgerows, margins and woodland interfaces, together with the loss of stewardship-managed farmland bird habitat and risks to sensitive water environments. The OUTLINE LEMP does not fix dark corridors, lighting thresholds, corridor permeability, species-specific flight route protection, or a secure long-term strategy for the habitats on which the scheme relies. The document says it aims to provide ecological enhancement, strengthen green infrastructure and support landscape and visual mitigation. That conflation is itself a problem: visual screening, planting and ecology are being bundled together at principle level without proving that what assists one objective will not undermine another.	Chapter 8 - Ecology and Biodiversity [APP-044] and provided mitigation strategies during construction, operation, as part of long-term species management and during decommissioning. The Applicant highlights that the current landscape is intensively used agricultural land and they have sought to protect important ecological features (ancient woodland, trees, woodland, hedgerows, watercourses) which are used by a variety of protected species. Further, the use of the Statutory Metric, a recognised proxy measure for biodiversity, and reported in the Biodiversity Net Gain Report [APP-218] demonstrates an improvement in the value of landscape features (habitats, hedgerow and watercourses).
BEPS-248	Outline Landscape and Ecology Management Plan	BNG is built on the OUTLINE LEMP , but the OUTLINE LEMP is not fixed The BNG report's claimed gains of 37.42% for habitats, 31.35% for hedgerows and 16.08% for watercourses depend on the Outline LEMP and related assumptions. But the BNG report itself acknowledges that the statutory	The Applicant would refer the reader to the responses BEPS-238. Further, the final LEMP will be in accordance with the Outline LEMP [APP-199] and will be secured by the

ID	Theme	Representation	Applicant's Response
		metric is only a habitat proxy providing relative values. It does not measure the functional ecology that makes the East Pye landscape sensitive, such as bat commuting networks, landscape permeability, dark-sky integrity or species viability. That makes the reliance on the OUTLINE LEMP doubly weak. First, the OUTLINE LEMP is only an outline framework. Second, the ecological outcomes claimed from it are being measured through a tool that does not capture the primary impacts of this scheme. The result is that neither the OUTLINE LEMP nor the BNG case demonstrates that mitigation is real, secured or effective.	DCO Consent such that the measures proposed will be implemented. Also, BNG is not mandatory for NSIPS but has been adopted by the Applicant to demonstrate its proposals to maximise biodiversity across the Scheme. In their Relevant Representation, Natural England [RR-1412] welcome the intention to deliver a minimum of 10% BNG.
BEPS-249	Outline Landscape and Ecology Management Plan	The OUTLINE LEMP does not secure durable ecological benefit through the full life of the scheme The OUTLINE LEMP states that management and monitoring duration will be defined in the later LEMP, but it also says that after decommissioning the landowners would choose how the land is to be used and managed, and that the landowner may return all the land to arable use, although some habitat areas may be left in situ. That is a serious weakness. A mitigation strategy that may be reversed to arable at the end of the project is not a secure ecological outcome. It is especially problematic where the scheme depends on years of habitat establishment and management to justify immediate losses to existing landscapes and stewardship land. If long-term	The Applicant is seeking a time-limited consent for the Scheme to have an operational period of up to 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 21 in Schedule 2 of the Draft DCO [AS-032]. At the end of the Scheme's operational life, apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned and the land returned to the landowner, as set out in the Outline DEMP [APP-198]. Post-

ID	Theme	Representation	Applicant's Response
		retention is optional, the OUTLINE LEMP does not provide a durable mitigation package.	decommissioning, the landowners would choose how the land is to be used and managed.
BEPS-250	Outline Landscape and Ecology Management Plan	Deferred mitigation is legally risky There is established authority that environmental defects may sometimes be cured later in a multi-stage process, but that depends on the statutory context and the nature of the defect. In the Habitats context, the courts have also made clear that mitigation cannot simply be relied upon at screening stage to avoid proper assessment. In <i>No Adastral New Town Ltd v Suffolk Coastal DC</i> [2015] EWCA Civ 88, the Court of Appeal discussed when defects in a staged process might be cured later. In <i>People Over Wind</i> (C-323/17), the CJEU made clear that mitigation measures cannot be taken into account to avoid proper Habitats assessment at screening stage. The present application is vulnerable because the OUTLINE LEMP is being used not merely as a later-stage implementation document, but as part of the evidential basis for current conclusions on ecology and BNG. Where the site supports a nationally important bat assemblage and the effectiveness of mitigation depends on specifics not yet fixed, this is not a safe or lawful use of deferred detail.	The construction, operation and decommissioning of the Scheme have been assessed in the ES [APP-036 to APP-195], which also identifies mitigation measures. The outline management plans [APP-196 to APP-205] are designed with the objective of securing the relevant environmental mitigation measures set out within the ES. The detailed management plans will be substantially in accordance with the outline management plans and are secured through Schedule 2 of the Draft DCO [AS-032]. These detailed management plans will be submitted to and approved by the relevant planning authority. This is a standard approach for securing mitigation for nationally significant infrastructure projects and provides the Secretary of State with sufficient information to be able to determine the DCO application.

ID	Theme	Representation	Applicant's Response
BEPS-251	Outline Landscape and Ecology Management Plan	OUTLINE LEMP Conclusion The OUTLINE LEMP should be given little weight. It is expressly incomplete, dependent on future detailed design, and relied upon to support both the ecology assessment and the BNG case before the critical details are known. It does not demonstrate secured and effective mitigation for the actual ecological receptors and landscape functions at East Pye Solar. In a site of this sensitivity, EN-1 requires mitigation to be properly secured and capable of assessment now, not left to later plans and assumptions.	The Applicant refers to its response to BEPS-248.
BEPS-252	Ecology and Biodiversity	Ecology policy conflict across the whole Scheme The Applicant's own policy appendix (Vol 3 Appendix 2.3) makes the position clear. East Pye Solar says its Ecology Chapter is assessed against EN-1, EN-3, EN-5 and the NPPF, and that those policies govern biodiversity, HRA, water management and mitigation. The same appendix also cites the decisive NPPF refusal tests: if significant biodiversity harm cannot be avoided, adequately mitigated, or as a last resort compensated for, permission should be refused; development likely to adversely affect an SSSI should not normally be permitted; and development causing loss or deterioration of irreplaceable habitat such as ancient woodland should be refused unless wholly exceptional reasons and a suitable compensation strategy exist. Applying that policy framework to the Scheme as a whole, the ecological problem is not a series of isolated local	The Applicant refers to its response to BEPS-063.

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		conflicts that can be tidied up by buffers, outline management plans or BNG. It is that the Order Limits sit within, and in places press directly against, a receptor-dense ecological network of chalk-stream tributaries, barbastelle maternity landscapes, ancient woodlands, SSSI woods, priority hedgerow systems, ponds, fen parcels and other irreplaceable habitats. The bat survey report records eleven barbastelle maternity colony records from the Norfolk Barbastelle Study Group within 2 km of the Order Limits, with overlapping core sustenance zones from Saxlingham Grove, Spring Wood, Little Wood, Brooke Wood and Tyrrels Wood among others. It also states that woodland roosts depend on surrounding arable mosaics and linear features, that typical home ranges average 3.5 km and do not exceed 5.5 km, and that the Order Limits support a bat assemblage of national importance with barbastelle activity recorded at every sampled location across the survey area. That evidence is policy-significant because it shows that the Scheme is not merely near bats. It occupies functionally linked barbastelle habitat across the whole Order Limits. The Ecology Chapter itself accepts that surrounding woodlands support barbastelle maternity colonies, that the Order Limits fall within the published 6 km core sustenance zones of nine known colonies, and that the combined zones cover the entire Order Limits. It further accepts that the nationally rare barbastelle is the third most abundant recorded bat species and that the	

ID	Theme	Representation	Applicant's Response
		Scheme area is nationally important for foraging and commuting bats.	
BEPS-253	Ecology and Biodiversity	The same broad sensitivity exists in the aquatic environment. The Ecology Chapter and aquatic appendix treat the River Tas system, Hempnall Beck and connected reaches as a hydrologically connected network. The Applicant records an Environment Agency white-clawed crayfish record approximately 6 km downstream on the River Tas and accepts that downstream habitats must be safeguarded by biosecurity, pollution prevention and sediment control. The aquatic appendix also identifies the key construction pathways at crossings as sediment release, turbidity, accidental pollution, temporary alteration of flows and barrier or bank damage, and recognises that parts of the connected Tas system are already failing WFD elements. The Planning Inspectorate's scoping response, as reproduced in Chapter 8, expressly noted the presence of white-clawed crayfish on the River Tas and required survey commitment at relevant locations when watercourse works are known. BEPS also relies on Norfolk Rivers Trust survey evidence of white-clawed crayfish in the Tas, which strengthens rather than weakens the need for precaution. On any realistic view, this is a chalk-stream landscape in which avoidance of impacts on connected watercourses, not reliance on generic construction controls, is the policy-compliant starting point.	The Applicant refers to its response to BEPS-087.

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BEPS-254	Ecology and Biodiversity	The Applicant's own desk study and bat material also show that irreplaceable habitats are a landscape-wide constraint, not an incidental edge issue. The bat appendix records 31 Ancient Woodland Inventory woodlands and four areas of lowland fen totalling fourteen parcels within 2 km of the Order Limits, noting that these are treated as irreplaceable habitats under the NPPF and the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. It also records that Shotesham-Woodton Hornbeam Woods SSSI shares boundaries with parcels 7F and 7H, and that numerous statutory and non-statutory sites lie close to or adjacent to the Scheme. The extended habitat survey further confirms that some parts of the development envelope surround off-site ancient woodland and are bounded by species-rich hedgerows, veteran-feature trees, ditches, ponds and broad strips of botanically richer grassland.	The Applicant refers to its response to BEPS-063
BEPS-255	Ecology and Biodiversity	The botanical position is itself a serious policy defect. The extended habitat survey expressly states that it does not constitute a full botanical survey or provide accurate mapping of invasive plant species. It also says the preliminary suitability assessment should not be taken as a full and definitive survey of protected species groups. Records of dominant and notable plants were only incidental to UKHab mapping. That matters here because the Scheme includes road widening, cable works, haul routes and other intrusive works through verges, margins, hedgerows, ditch edges and semi-natural strips that are	The Applicant refers to its response to BEPS-212.

ID	Theme	Representation	Applicant's Response
		the very places where rare or locally significant plant assemblages are most likely to occur. The Applicant cannot lawfully assert compliance with EN-1, EN-3, CIEEM EclA and the NPPF while relying on a survey base that expressly disclaims being a full botanical survey. BEPS has a report from a level 6 botanist explaining the botanical importance of the area for assemblages of rare plants in field margins and roadside verges threatened by the scheme.	
BEPS-256	Ecology and Biodiversity	Against that background, the Applicant's reliance on the mitigation hierarchy is not persuasive. The Ecology Chapter says the Scheme complies with EN-1 by applying the hierarchy of avoidance, minimisation, restoration and offsets, yet in practice the Scheme depends on retention of 'the large majority' of hedgerows, generic exclusion buffers, CEMP controls and later habitat creation through the Outline LEMP and BNG. It also treats BNG as embedded enhancement within the Scheme. That is not a lawful or policy-compliant use of the hierarchy in a landscape of this sensitivity. BNG and enhancement sit at the bottom of the hierarchy. They cannot justify choosing a layout that industrialises functionally linked barbastelle habitat, works through a connected chalk-stream system with white-clawed crayfish sensitivity, or places infrastructure across a matrix of ancient woodland, irreplaceable habitat and unsurveyed botanical margins. On the Applicant's own evidence, East Pye Solar is embedded in a nationally important bat landscape, a	The approach taken for this project have adopted the mitigation hierarchy by establishing buffers to protect important ecological features, including designated sites, (SSSIs), ancient woodland, woodland, trees and watercourses. This approach is set out in the Design Principles, Parameters and Commitments [APP-213]. This <i>avoidance</i> is then followed by the inclusion of <i>embedded mitigation</i> to further protect habitats and species (as set out in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], including the adoption of an Outline CEMP [APP-196], and Outline OEMP [APP-197]. The Applicant has also demonstrated improvements to

ID	Theme	Representation	Applicant's Response
		hydrologically connected chalk-stream system, and a dense woodland–hedgerow–pond–fen network that includes irreplaceable habitats and SSSI woods. On the Applicant's own survey limitations, there is no full botanical survey and no complete basis for concluding that verge, margin and edge habitats affected by road widening and other works have been properly characterised. On the Applicant's own policy basis, such harm must first be avoided, not simply buffered and then balanced by BNG. Accordingly, the only mitigation-hierarchy response that is consistent with EN-1, EN-3, EN-5 and the NPPF is avoidance. That means avoiding development in this ecological landscape, not merely adjusting details within it. Because the Scheme has not done so, it is in conflict with the Applicant's own cited policy framework and should be recommended for refusal on ecology grounds. Remedy sought East Pye Solar should be refused development consent due to lack of need in relation to T7 CP2030 targets and unmitigable ecological harms.	biodiversity using the proxy Statutory BNG Metric which will be achieved through the Outline LEMP [APP-199] and its supporting Green Infrastructure Strategy [AS-005]. The Applicant highlights that BNG is not currently mandatory for NSIPS but has been adopted to measure the benefits the Scheme can deliver for Biodiversity. In their Relevant Representation, Natural England [RR-1412] welcome the commitment to deliver a minimum of 10% BNG.
BEPS-257	Water Environment	Chapter 9 – Water Environment The East Pye Solar application raises serious and unresolved concerns in relation to the water environment. These concerns go to lawful assessment, public health, ecological risk, flood risk, water resources and the practical deliverability of the Scheme. They are not peripheral	The Applicant notes this comment. Concerns raised from BEPS have been addressed in the responses to BEPS-015, BEPS-019, BEPS-021, BEPS-121 and BEPS-258.

ID	Theme	Representation	Applicant's Response
		matters. They are central to whether this Scheme can lawfully and safely proceed. This is a highly sensitive and interconnected water environment	
BEPS-258	Water Environment	The Scheme extends across multiple waterbodies and catchments, including the River Tas and Hempnall Beck chalk stream system, as well as Starston Brook, Broome Beck and the wider Waveney-linked drainage network. The applicant's own Chapter 9 acknowledges that sensitive receptors include surface watercourses, groundwater, private water supplies, Source Protection Zones and designated ecological sites, and that potential effects arise from contaminants, runoff changes, groundwater recharge changes, cable heat and firewater from the BESS and substations. The Flood Risk Assessment also accepts that designated sites are hydrologically linked to the Order Limits via watercourses and groundwater flow and therefore have potential to be affected by the Scheme. That is an important admission. It confirms that this is not a series of isolated fields, but a connected hydrological system.	Potential impacts to the water environment from all phases of the Scheme have been identified within ES Volume 1: Chapter 9 – Water Environment [APP-045]. With the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to water receptors can be suitably managed and impacts are therefore assessed as 'Not Significant'.
BEPS-259	Water Environment	The Planning Inspectorate required this chapter to be properly assessed, not deferred The Planning Inspectorate did not permit the applicant to treat these issues as minor. It required the ES to assess water resources in a water-stressed area, to provide an	The Applicant notes the concerns raised. Within, ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164], new groundwater or surface water

ID	Theme	Representation	Applicant's Response
		FRA, to undertake a WFD assessment or screening, and specifically to identify private water supplies and assess the potential impacts to those supplies and their buffers where significant effects could occur. The applicant's own Chapter 9 reproduces that requirement. It records that the Inspectorate noted private water supplies within 250m of the site, that accurate location and abstraction data had not been provided at scoping stage, and that the ES should identify the location of and assess the potential impacts to private water supplies and their buffers. The central criticism is that the application has moved from omission to partial identification, but not to a proper impact assessment.	abstraction options have been scoped out due to the water scarcity in the region, with tankering identified as the preferred method of supply for potable water. The Applicant notes AWS's current position on new unplanned non-domestic water requests. This is in place by Anglian Water to protect domestic water supplies. The Applicant 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. This approach is being undertaken in order to not impact the local private water supplies. Rainwater harvesting and on-site storage have been identified as preferred option for supply of non-potable water. Therefore, from a supply perspective there is no impact on the local private water supplies.

ID	Theme	Representation	Applicant's Response
			The Applicant notes that the impacts on water quality from potential mobilisation of contaminants has been omitted from Table 9-7 of ES Volume 1, Chapter 9 – Water Environment [APP-045] for private water supplies and the chapter will be updated at a later deadline to rectify this. Notwithstanding the above, with the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to water receptors (including private water supplies) can be suitably managed and impacts are therefore assessed as 'Not Significant'.
BEPS-260	Water Environment	The treatment of private water supplies is one of the clearest and most serious defects. Private water supplies are among the most important receptors on this Scheme. They are not just environmental receptors. They are human health receptors. The Environment Agency's scoping response was explicit. It recorded that the Phase 1 Ground Conditions Assessment showed 35 private water supplies within 250m of the site for which accurate location data and abstraction	The assessment of risks to and impacts upon groundwater as a resource (including Private Water Supplies (PWS)) has been undertaken in accordance with the methodology agreed following Scoping, and on the basis of the available information, as provided by the Environment Agency, British Geological Survey and South Norfolk Council. Where the information

ID	Theme	Representation	Applicant's Response
		stratum information were unavailable, and required the applicant to determine the locations and, where possible, the abstracted strata of private abstractions and to assess potential impacts to those abstractions and their applicable buffers within the potential influencing distance of the site. That concern has not been answered adequately.	provided was incomplete, assumptions relating to the depth of wells or boreholes, borehole construction details, or the strata from which water was abstracted assessment has been undertaken have necessarily been made. It is noted that the Environment Agency themselves have not raised a similar comment in relation to the information presented. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). The Applicant notes that the impacts on water quality from potential

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			mobilisation of contaminants has been omitted from Table 9-7 of ES Volume 1, Chapter 9 – Water Environment [APP-045] for private water supplies and the chapter will be updated at a later deadline to rectify this. Notwithstanding the above, with the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to water receptors (including private water supplies) can be suitably managed and impacts are therefore assessed as 'Not Significant'.
BEPS-261	Water Environment	Figure 16.5 shows the scale of the private water supply problem, but only as a proximity exercise Figure 16.5 shows the locations of private water supplies using a 250m buffer around the BESS, 132kV and 400kV substations, and associated infrastructure. It visually confirms dense clusters of private water supplies, wells and abstractions around the principal infrastructure areas, especially the south-western Site 1/BESS/Grid Hub cluster and the Site 5 400kV substation area. That figure is damaging to the applicant for two reasons.	The ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184 to APP-186] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource. The assessments have been undertaken in accordance with the methodology agreed following scoping and use a 250m Study Area for low ground disturbance works such

ID	Theme	Representation	Applicant's Response
		First, it demonstrates the sheer number and concentration of private water supplies around the highest-risk infrastructure, including the BESS, National Grid substation and 400kV substations. At Site 1, the map shows a striking cluster of receptors packed around the principal infrastructure hub. At Site 5, it again shows multiple receptors close to the proposed 400kV substation and flanking the proposed site access track. Second, it also exposes the inadequacy of the applicant's method. The figure is only a 250m proximity plot. It is not a hydrogeological risk assessment. It does not identify abstraction depths, strata, flow direction, hydraulic connectivity, travel times, recharge linkages, contaminant pathways or receptor vulnerability. It therefore does not answer the critical question: which supplies are actually at risk from the proposed hazardous infrastructure and by what pathway? It also does not even record the many other private water supplies beyond 250m from the redline boundary of the scheme, in this closely hydrologically connected landscape. In other words, the applicant has mapped the closest receptors, but has not assessed them. Neither has the applicant provided any evidence that the multiple private water supplies beyond 250m from the scheme will be not also be impacted by it.	as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184 to APP-186] will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). As described in ES Volume 1, Chapter 16 Ground Conditions [APP-052] <i>"As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground</i>

ID	Theme	Representation	Applicant's Response
			<i>investigation to be undertaken post-consent".</i> 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 (secured by DCO Requirement 13). The Outline CEMP [APP-196] also requires that the Applicant undertake Hydrogeological Risk Assessment for trenchless crossings wherever these interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors.
BEPS-262	Water Environment	A 250m buffer is not an assessment of hydrological or hydrogeological connectivity Groundwater and pollutant pathways do not stop at an arbitrary 250m circle. In an area underlain by Principal Aquifer and linked through superficial deposits, field drains, watercourses and topographic flow routes, risk depends on pathway and connectivity, not merely radial distance.	The Applicant refers to its response to BEPS-259 and BEPS-260.

ID	Theme	Representation	Applicant's Response
		The Environment Agency's earlier comments show why. It considered the location and abstraction strata of private supplies so important that, without them, it was difficult even to determine whether parts of the site might overlie default SPZ1-type buffers in a worst-case scenario. The current ES materials do not provide that missing hydrogeological understanding. The Water Resources Assessment says it has reviewed impacts on existing lawful water users including private supplies, but that is not the same as a receptor-specific risk assessment. The private water supplies impacted by this scheme are of many different types, some shallow Tudor or Victorian hand-dug wells, other modern deep boreholes. There is no analysis of how these different supplies would be impacted in each specific location. In a heavy clay landscape, even heavy rain has the effect of substantially increasing sediment and filtration problems in Tudor/Victorian hand-dug wells – construction effects and changes to hydrology are likely to have a significant impact on private water supplies and their filtration in this environment.	
BEPS-263	Water Environment	East Pye Solar has not demonstrated lawful protection of private water supplies. Under the Private Water Supplies (England) Regulations 2016, a private supply must not contain any substance at a concentration or value constituting a potential danger to human health, and the applicable risk assessment must establish whether such a risk exists, satisfy EN 15975-2, and take account of Water	The Applicant refers to its response to BEPS-259, BEPS-260 and BEPS-425. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184 to APP-186] will be refined through ground

ID	Theme	Representation	Applicant's Response
		Framework Directive monitoring. The Applicant has not undertaken any equivalent receptor-specific assessment. Its approach remains one of receptor plotting and arbitrary buffers, rather than a pathway-based assessment of catchment, abstraction, treatment, storage, distribution, hydraulic connectivity, abstraction depth, travel time, contaminant fate, or vulnerability. That is not merely incomplete evidence. It is incapable of demonstrating compliance with the statutory standard governing private water supplies.	investigation. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA).
BEPS-264	Water Environment	The grid infrastructure is proposed over a Principal Aquifer and in sensitive water protection settings. The Flood Risk Assessment confirms that the BESS, National Grid Substation and Project Substations are located over a Principal Aquifer, on the catchment of the Waveney Chalk Stream, and that some are within Drinking Water Safeguard Zones. It says that impermeable membranes and controlled discharge will be used to mitigate residual pollution risk. That is not reassuring. It is an admission that these are intrinsically sensitive hydrogeological locations requiring engineered containment because pollutant mobilisation to underlying geology is a real concern. It is particularly troubling at Site 1, where the figure shows a dense cluster of private water supplies around the BESS/Grid Hub area, and at Site 5, where the 400kV substation is proposed, there is functional connectivity to	The principal aquifer beneath the Order Limits, private water supplies, including those in vicinity of Site 1 and the River Tas have been identified as receptors within ES Volume 1, Chapter 9 – Water Environment [APP-045]. The assessment of effects within this chapter are residual, as embedded mitigation is proposed as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] to manage the residual risk of impacts occurring. This includes the provision of the impermeable membrane within the surface water drainage systems for

ID	Theme	Representation	Applicant's Response
		the Tas by underground culvert, stream and ditches, and the FRA confirms that detailed modelling for the Sub-Site 5A 400kV substation has not even been completed in InfoDrainage.	the BESS, National Grid and Project Sub-stations amongst other pollution management measures. Therefore, the assessment within ES Volume 1, Chapter 9 – Water Environment [APP-045] concludes the potential impacts arising from the Scheme to water receptors is 'Not Significant', with the exception of the cessation of agricultural use/fertiliser which is assessed as 'Significant Major Beneficial'. It has been outlined within Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] that the surface water drainage system for the 400kV Substation within Sub-Site 5A will follow the same principles as that of the Project Substations 1 and 3 and attenuation volume requirements have been outlined. The final drainage design is secured by DCO Requirement 11.

ID	Theme	Representation	Applicant's Response
BEPS-265	Water Environment	The flood and drainage strategy remains outline and deferred The applicant repeatedly relies on outline drainage principles and future detailed design. The FRA states that the surface water drainage arrangements are indicative and will be subject to refinement at detailed design stage. It also confirms that infiltration testing will be undertaken post-consent and that detailed drainage design will be secured later by DCO Requirement. This is not a completed demonstration of safety for the highest-risk infrastructure. It is an outline strategy. That matters because the major infrastructure areas already have identified localised surface water flood risk. The FRA acknowledges localised areas of surface water flood risk in and around the National Grid Substation and 400kV Project Substation in Sub-Site 1B. Yet the engineering solution is still deferred.	The Scheme has Work Nos. and does not have a detailed design at this stage for the BESS and Substation areas. A detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the grant of the DCO (if consented), as secured within DCO Requirement 11. This will ensure surface water flood risk will be managed at the BESS, National Grid Substation and Project Substations for the operational phases of the Scheme. Embedded mitigation measures for surface water runoff, flood risk and pollution management are contained within and secured by the relevant management plans for each phase of the Scheme (Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]). The surface water drainage maintenance plan will be developed further in conjunction with the detailed drainage design.

ID	Theme	Representation	Applicant's Response
BEPS-266	Water Environment	The LLFA has already said the applicant has underestimated impermeable area and not properly assessed infiltration or runoff effects The LLFA's consultation response is highly significant and supports objection rather than reassurance. It states that the applicant has under-estimated the impermeable area, has not yet assessed or investigated the ground conditions and the viability of infiltration, and has provided incomplete or inconsistent information. It expressly disagreed with the applicant's attempt to scope out flood risk, changes in surface water runoff and groundwater recharge arising from increases in impermeable areas from solar panels and infrastructure buildings. The LLFA also pointed to the real surface water flood sensitivity of local communities and noted that some are already being investigated for flood and water management solutions because of the frequency of flooding incidents. That is directly relevant to the applicant's recurring proposition that the arrays are effectively hydrologically neutral because they are raised and grassed beneath. The local flood authority does not appear to accept that this issue can simply be screened away.	The Applicant notes this comment and is in discussion with the LLFA to address their concerns.
BEPS-267	Water Environment	Private sewerage There has been no mapping of private sewerage or impact assessment of changes to runoff effects on their ability to	The Applicant notes that private sewerage has not been mapped however records are unlikely to be

ID	Theme	Representation	Applicant's Response
		function. Private sewage arrangements are frequently at the same properties with private water supplies. If septic tanks and treatment plants cannot drain due to changes to ground water levels or flooding, then there is a significant risk that they will overflow or stop functioning. This risks contaminating surrounding land, private water supplies, and the chalk streams.	widely available for the presence of these features. Notwithstanding this, the majority of the Order Limits will have solar panel installation. As set out in Section 8 of ES Volume 3: Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], solar panels will be raised above the ground on narrow supports with grass and/or wildflower meadow around/beneath them. Rainfall falling on the panels will drip onto the grass cover beneath and percolate to ground as per the existing regime and allowing continued groundwater recharge across the Order Limits. The impermeable areas of the Scheme (notably the BESS, National and Project Substations) will include surface water attenuation with design up to and including the 1 in 100 annual probability +45% allowance for climate change rainfall event as secured in the Design Principles, Parameters and Commitments [APP-213]. The

ID	Theme	Representation	Applicant's Response
			Scheme will therefore not give risk to increased flood risk/significant changes in groundwater recharge that will affect the functionality of private sewerage systems.
BEPS-268	Water Environment	The EA correspondence shows that important parts of the flood evidence base were incomplete or uncertain. Appendix B to the FRA shows that the EA's 31 March 2025 response could not provide flood levels for the Starston Brook area because there was no detailed local modelling there, and stated that the risk from fluvial flooding associated with the ordinary watercourse was unknown without a modelling exercise in the FRA. The 17 April 2025 EA response explained that some updated Flood Zone mapping for smaller watercourses reflects modelling techniques akin to surface water direct-rainfall approaches, and recommended that the FRA present each dataset separately and compare it with topography. The LLFA's October 2024 letter said it could not confirm the suitability of the solar SuDS approach without further information on the arrangement of the arrays and the scale and nature of foundations. All of this shows that the flood evidence base was not settled or straightforward. Key issues depended on generalised mapping, approximation, additional site work	The Applicant notes that this comment relates to EA responses to the PEIR and further work and discussion has been undertaken with the EA since then. As set out in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], the area of no model availability relates to the Starston Brook and the masterplan/Order Limits were updated so that areas of Flood Zones 2 and 3 associated with this watercourse are no longer within the Order Limits, and any works are set at significant elevation above the Starston Brook floodplain. This approach was welcomed by the EA in the meeting in December 2025.

ID	Theme	Representation	Applicant's Response
		and further design development rather than a completed and robust site-specific model. That undermines confidence in the applicant's conclusions on flood safety and runoff behaviour. The relevant correspondence is set out in Appendix B of the FRA.	The CRC has also been reduced in width with commitment to providing trenchless crossings within areas of Flood Zones 2 and 3. In addition, solar panels are located outside all areas of Flood Zones 2 and 3 within the Order Limits. As such, it was agreed with the EA that further modelling was not required. Freeboard allowances for solar panels and inverter/converter units are set out in Section 8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018]. Section 9 of this report also includes outline surface water drainage arrangements for impermeable areas associated with the Scheme (the BESS, National and Project Substations, and inverter/converter units).
BEPS-269	Water Environment	The water resources case is also weak and reinforces the wider water objection The Water Resources Assessment confirms that the Scheme has potable and non-potable demand in	The Applicant notes the concerns about water scarcity in the area. The Applicant has carried out a ES Volume 3, Appendix 9.3 - Water Resources

ID	Theme	Representation	Applicant's Response
		construction, operation and decommissioning, and that, without embedded mitigation, the supply-demand balance cannot be achieved. It also records a separate minimum fire suppression allowance of 456m³. Anglia Water has not agreed to supply the project and it remains without a water source, relying on 'tankering'. It gives no indication of the source or security of this tankered water. This is relevant here because a site with no demonstrated conventional water supply solution is also proposing major hazardous infrastructure in a sensitive groundwater setting with clustered private water supplies nearby. That is a serious deliverability and resilience concern.	Assessment [APP-164] with tankering identified as the preferred method of supply for potable water and water associated with fire suppression. The Applicant notes AWS's current position on new unplanned non-domestic water requests. This in place by Anglian Water to protect domestic water supplies. The Applicant 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. This approach is being undertaken in order to not impact the local private water supplies.
BEPS-270	Water Environment	The applicant's significance conclusions are not persuasive The ES summary table concludes that impacts on water supplies, Source Protection Zones, hydrological receptors and hydrogeological receptors are negligible or low, and therefore minor and not significant. Those conclusions are not convincing because the underlying assessment is not adequate. There is still no	Receptor sensitivity has been identified within Table 9.4 of ES Volume 1, Chapter 9 – Water Environment [APP-045]. Embedded mitigation has been included for all phases of the Scheme as set out in and secured by the

ID	Theme	Representation	Applicant's Response
		clear hydrogeological model for private supplies, no receptor-by-receptor vulnerability analysis, no contaminant travel-time or plume assessment, no sufficient linkage between abstraction depth and proposed risk sources, and no robust catchment-scale analysis of how pollutants or altered drainage conditions may move through the system. The result is that the significance conclusions appear to rest on generic mitigation assumptions rather than demonstrated receptor-specific evidence.	Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Where trenchless cable crossings interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196].
BEPS-271	Water Environment	The chapter fails to demonstrate lawful WFD and groundwater protection compliance The Environment Agency's scoping response required hydrogeological risk assessment where HDD or trenchless methods might interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors and required better understanding of ground conditions and groundwater-surface water relationships. The chapter still proceeds from an insufficient understanding of groundwater pathways, while simultaneously placing major infrastructure over Principal Aquifer and near many private supplies. That is not a satisfactory basis for concluding no deterioration, no significant effect and no unacceptable risk.	Where trenchless cable crossings interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196]. The ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] is based on information available at the time of the Application being made and will be kept under review in line with new information and assessments which become available as part of the future

ID	Theme	Representation	Applicant's Response
			ongoing design process for the Scheme, where this information may have relevance to WFD requirements and objectives.
BEPS-272	Water Environment	Significance of the Water Environment This is one of the most important chapters because it brings together several of the strongest objections to the Scheme: • The principal infrastructure is proposed in hydrogeologically sensitive locations. • There are numerous private water supplies clustered around the BESS/Grid Hub and Site 5 substation area. • The applicant's analysis stops largely at a 250m plotting exercise rather than a pathway-based assessment. • The FRA and drainage design remain indicative and deferred. • The LLFA has already challenged the applicant's underestimation of impermeable area, lack of infiltration evidence and attempt to scope out runoff and groundwater recharge effects. • The EA required further hydrogeological assessment and better characterisation of private supply risk.	<u>Identification of, and assessment of risks to Private Water Supplies</u> The ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184 to APP-186] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource (including Private Water Supplies) from existing contamination in the ground. The assessment has been undertaken in accordance with the methodology agreed with the Environment Agency following Scoping, using a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The groundwater abstractions identified (including private water supplies) within the Study Area are presented in tables 3.10 and 3.11 of

ID	Theme	Representation	Applicant's Response
		The Inspectorate expressly required identification and assessment of private water supplies and their buffers. Those requirements have not been satisfactorily met.	the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment, as presented in information provided by the Environment Agency, British Geological Survey and South Norfolk Council. Where the information provided was incomplete, assumptions relating to the depth of wells or boreholes, borehole construction details, or the strata from which water was abstracted assessment has been undertaken have necessarily been made. It is noted that the Environment Agency themselves have not raised a similar comment in relation to the information presented. With the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to water receptors (including private water supplies) associated with existing contamination in the ground can be

ID	Theme	Representation	Applicant's Response
			suitably managed and effects are therefore assessed as 'Not Significant'. The assessment of impacts to water receptors, including private water supplies, has been undertaken within ES Volume 1, Chapter 9 – Water Environment [APP-045]. The conclusions, with the incorporation of embedded mitigation (as secured in outline management plans), are that the residual effects are 'Not Significant' with the exception of cessation of agricultural use, which provides a Beneficial Major Significant impact. <u>FRA indicative/drainage deferred</u> The assessment undertaken within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] provides a robust assessment of flood risk and outlines embedded mitigation measures to ensure that flood risk is not increased at the site or elsewhere.

ID	Theme	Representation	Applicant's Response
			The surface water drainage design within Section 9 of the FRA has been developed to a level appropriate to the level of detail available for the Scheme. The detailed surface water drainage design is secured through DCO Requirement 11. <u>LLFA comment/position</u> The impermeable areas for the Scheme and their outline surface water drainage arrangements have been identified within Section 9 of Environmental Statement Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. The detailed surface water drainage design is secured through DCO Requirement 11. Infiltration testing has not been undertaken at this stage due to the large area of the Order Limits and the location of infrastructure has not been finalised. It is therefore considered appropriate to defer infiltration testing to post-consent once these locations

ID	Theme	Representation	Applicant's Response
			have been finalised to avoid abortive results. An appraisal of the geology of the area was undertaken within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] using BGS historic borehole data, which shows that the main geology across the Order Limits is Diamicton (also known as Boulder Clay) of the Lowestoft Formation which is described in publicly available records predominantly clayey (i.e., of very low permeability) and across the majority of the Scheme is present to a thickness that would preclude the use of infiltration drainage. On this basis, the use of infiltration drainage was discounted at this stage and a 'Plan B' was provided for a 'discharge to watercourse' scenario. Further discussions with the LLFA are ongoing to address their comments in relation to providing adequate detail for a Plan A/Plan B scenario.

ID	Theme	Representation	Applicant's Response
			Following feedback from the PEIR, the effects on groundwater recharge for all phases of the Scheme were scoped into ES Volume 1, Chapter 9 – Water Environment [APP-045] .
BEPS-273	Water Environment	Statutory Consultation Response from EA Nor are these concerns confined to points raised only by objectors. The Environment Agency's statutory section 42 response makes clear that substantial work still remained outstanding at PEIR stage and, on several issues, remains only partially resolved even now. The EA said that further information was required before it could provide a definitive response, and specifically identified remaining gaps in groundwater and contaminated land, surface water quality, water resources, chalk stream valuation, watercourse crossings, flood modelling detail, private abstractions, pollution risk from the BESS and substations, and the need to review further outline management plans as they were developed.	The Applicant notes this comment and would emphasise that discussion was undertaken in December 2025 whereby the EA confirmed that they were satisfied that further hydraulic modelling was not required and were satisfied with the principles of the surface water drainage arrangements. The Applicant's view is that the EA's Relevant Representation is a request for further clarification. Further discussions are ongoing with the EA to address the comments raised, with secured documents to be updated at a later deadline to provide further clarification/commitment as requested by the EA. The Relevant Representations from the EA have been responded to within the Applicant's Response to Relevant

ID	Theme	Representation	Applicant's Response
			Representations submitted at Procedural Deadline A.
BEPS-274	Water Environment	In relation to private water supplies, the EA expressly recorded inconsistency in the number of private abstractions identified, stated that the assessment of risks to private abstractions could not be adequately undertaken, and required the applicant to provide more information on the location and source of private abstractions, including local authority records and known wells, adopting a precautionary approach if better positional data could not be obtained. The EA also required the search area for groundwater abstraction receptors to be extended beyond 250m, noting that potential water quality impacts to abstractions over 250m from the boundary could not be fully discounted where Principal aquifers with high groundwater transmissivity are present, and recorded six licensed groundwater abstractions within 1km of the Proposed Development, including a public water supply borehole at Tivetshall with an associated Source Protection Zone extending into the site. The EA further stated that there were no adequate measures to monitor and respond to pollutants from leaks and spills during operation at the BESS and substations, nor sufficient provision for control of firefighting runoff from substation fires, and required adequate mitigation, lining and containment for operational runoff and firewater. These are not marginal technical queries. They are central	As noted above, the Relevant Representations from the EA have been responded to within the Applicant's Response to Relevant Representations submitted at Procedural Deadline A. The ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource. The assessment has been undertaken in accordance with the methodology agreed following scoping and uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The abstractions (including Private Water Supplies) within the Study Area are presented in tables 3.10 and 3.11 of the ES Volume 3, Appendix 16.1 -

ID	Theme	Representation	Applicant's Response
		water-environment deficiencies identified by the statutory regulator itself, and they reinforce the conclusion that the applicant still has not demonstrated a robust understanding of receptor sensitivity, contaminant pathways, or the measures necessary to protect controlled waters and private supplies across the Scheme.	Phase 1 Ground Conditions Assessment [APP-184]. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). As described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] "As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent".

ID	Theme	Representation	Applicant's Response
			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 (secured by DCO Requirement 13). The Outline CEMP [APP-196] also requires that the Applicant undertake Hydrogeological Risk Assessment for trenchless crossings wherever these interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors. Embedded mitigation measures for surface water runoff, flood risk and pollution management are contained within and secured by the relevant management plans for each phase of the Scheme (Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]).

ID	Theme	Representation	Applicant's Response
BEPS-275	Water Environment	Outstanding matters identified by the EA and LLFA Although the application now contains more water-related documentation than was available at PEIR stage, comparison with the Environment Agency's section 42 response and the LLFA's consultation response shows that many of the principal concerns have not in fact been fully resolved. Some matters have been addressed only in form. For example, the applicant has now provided a Chapter 9, a Flood Risk Assessment, a Water Resources Assessment, a WFD Assessment and a figure plotting private water supplies. However, the substantive deficiencies identified by the statutory bodies remain. In particular, the Environment Agency required further information before it could provide a definitive response and identified continuing gaps in groundwater and contaminated land, surface water quality, water resources, private abstractions, pollution risk from the BESS and substations, flood modelling detail and watercourse crossing impacts. The position on private water supplies remains especially unsatisfactory. The Environment Agency expressly stated that the number of private abstractions identified in the PEIR material was inconsistent, that risks to private abstractions could not be adequately assessed, and that the applicant needed to provide more information regarding the location and source of private abstractions, including local authority records and known wells. The EA also	Discussions were undertaken with the EA pre-and post-PEIR (April 2025 and December 2025 respectively) and there was agreement on the scope of the assessment on flood risk and the principles of the surface water management including firewater runoff management. The Applicant notes that further information/clarification has been requested by the EA and the LLFA, and discussions are ongoing with these consultees. Where necessary, documentation will be updated at a later deadline. The ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource. The assessment has been undertaken in accordance with the methodology agreed following scoping and uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may

ID	Theme	Representation	Applicant's Response
		required the search area for groundwater abstraction receptors to be extended beyond 250m, because impacts on abstractions over 250m could not be discounted where Principal aquifers with high transmissivity are present. The later production of Figure 16.5 does not resolve that objection. It remains only a 250m proximity plot and is not a pathway-based hydrogeological assessment. It does not identify abstraction depth, strata, groundwater flow direction, hydraulic connectivity, travel time, or contaminant pathway to individual or clustered supplies.	require deeper piled foundations. The identified PWS recorded within both the 250m and 1km Study Areas are presented on ES Volume 2, Figure 16.5 Locations of Private Water Supplies [APP-109]. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA).As described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] "As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground

ID	Theme	Representation	Applicant's Response
			<i>investigation to be undertaken post-consent".</i>
BEPS-276	Water Environment	Likewise, the Environment Agency's concerns about pollution and firewater risk from the BESS and substations remain only partially addressed. The EA stated that there were no adequate measures to monitor and respond to pollutants from leaks and spills during operation at the BESS and substations, and no sufficient provision for control of firefighting runoff from substation fires, and required adequate lining, containment and pollution-control measures for all such infrastructure. Although the later FRA now refers to impermeable membranes, shut-off valves and tankering of contaminated water, this remains an outline containment concept rather than a demonstrated, receptor-specific and fully engineered solution. The same is true of flood risk and drainage more generally. The LLFA stated that the applicant had under-estimated impermeable area, had not yet assessed or investigated the viability of infiltration, and had provided incomplete and inconsistent information in the PEIR and supporting flood material. It expressly disagreed with the applicant's attempt to scope out flood risk, changes in surface water runoff and groundwater recharge arising from solar panels and infrastructure buildings. The application has since developed its drainage narrative, but the FRA remains indicative, with detailed drainage design, infiltration testing, crossing methodology and some exceedance routing still deferred to later stages. That is not the same as	The layout of the BESS is yet to be finalised however outline surface water attenuation requirements (including allowance for firewater runoff) has been included in ES Volume 3: Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. Detailed surface water drainage is secured through DCO Requirement 11. Following feedback from the LLFA on the PEIR, the potential impacts to receptors from changes to groundwater recharge for all phases of the Scheme was scoped into and is included within ES Volume 1: Chapter 9 – Water Environment [APP-045]. Surface water drainage arrangements for all phases of the Scheme have been considered with the commitment to providing drainage systems for temporary construction compounds and access tracks as set out within and

ID	Theme	Representation	Applicant's Response
		demonstrating at application stage that the Scheme will be safe, will not increase flood risk elsewhere, and will not create unacceptable risks to controlled waters, private supplies and downstream communities. Accordingly, the later submissions reduce some areas of uncertainty but do not demonstrate that the principal concerns of the Environment Agency and the LLFA have been fully resolved. On the contrary, the remaining deficiencies identified by those statutory bodies continue to support objection to the Scheme on water environment grounds.	secured within the Outline CEMP [APP-196] and Outline DEMP [APP-198]. For the operational phase, the BESS, National Grid and Project Substations, access tracks and standalone converter/inverter units, there is a commitment to providing surface water drainage systems for these elements with design up to and including the 1 in 100 annual probability +45% allowance for climate change rainfall event, as set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] and secured within the Design Principles, Parameters and Commitments [APP-213].
BEPS-277	Water Environment	The Planning Inspectorate's Scoping Opinion These outstanding concerns also map directly onto the Planning Inspectorate's own scoping requirements. The Inspectorate was clear that water resources could not be scoped out because the Scheme is located in an area identified as water stressed, and that the ES should assess the potential impacts of the development on water resources, including water supply and demand	The Applicant acknowledges the comments regarding the ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164]. As part of this assessment, the various sources of water supply were assessed. Due to the water scarcity in the region, new groundwater or surface water

ID	Theme	Representation	Applicant's Response
		requirements during construction and operation. The later Water Resources Assessment responds to that requirement only in part: it confirms serious regional water stress and discusses supply-demand balance, but it still does not demonstrate a firm, secured source of supply and instead relies on mitigation-led assumptions such as tankering and storage. The Inspectorate also required a Flood Risk Assessment and made clear that the FRA must consider whether all flood-sensitive equipment remains operational during the 0.1% event, as well as off-site drainage and flood-risk effects, including the potential for the solar installation to increase runoff from the site. The LLFA's statutory consultation response shows that this has not been convincingly demonstrated. Norfolk County Council continued to object to the applicant's under-estimation of impermeable area, lack of infiltration evidence, failure to scope in changes to runoff and groundwater recharge, and incomplete assessment of site access, compounds, tracks and temporary works.	abstraction options were scoped out. This resulted in tankering and storage being the viable option for the scheme for potable water and rainwater harvesting and on-site storage have been identified as preferred option for supply of non-potable water. Due to there being numerous tankering companies, tankering is a secure source of supply. Section 8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] outlines embedded flood risk mitigation. All infrastructure is located within Flood Zone 1 and outside of surface water flood risk areas as far as reasonably practicable. Limited areas of solar panels are located within low-high surface water flood risk areas, however they are designed such that the sensitive electrical equipment is set at an appropriate freeboard above ground level. The proposed infrastructure in the Scheme is therefore designed to

ID	Theme	Representation	Applicant's Response
			remain operational in times of flood up to and including the 1 in 1000 (0.1% annual probability plus climate change event. This is secured within the Design Principles, Parameters and Commitments [APP-213]. Section 9 of this report also sets out outline surface water drainage arrangements for the BESS, National Grid and Project Substations with attenuation provided up to and including the 1 in 100 annual probability +45% allowance for climate change rainfall event, as secured within the Design Principles, Parameters and Commitments [APP-213]. Detailed surface water drainage design is secured through DCO Requirement 11.
BEPS-278	Water Environment	Most importantly for present purposes, the Inspectorate expressly noted that a number of private water supplies lie within 250m of the site, that accurate location and abstraction data were not available, and that the ES should identify the location of and assess the potential impacts to private water supplies and their buffers where significant effects could occur. The applicant's response, as recorded	The ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource. The assessment has been undertaken

ID	Theme	Representation	Applicant's Response
		in Chapter 9, is essentially that the Water Resources Assessment provides information on private water supplies and that Figure 16.5 displays them. That falls materially short of what the scoping opinion required. A location plot within a 250m buffer is not an assessment of impacts to supplies and their buffers. It does not provide abstraction depth, source strata, hydraulic connectivity, pathway analysis, travel time, or receptor-specific vulnerability. Figure 16.5 itself demonstrates a dense clustering of supplies around the most sensitive infrastructure areas, especially Site 1/BESS/Grid Hub and Site 5, but still only as a proximity exercise.	in accordance with the methodology agreed following scoping and uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The abstractions (including Private Water Supplies) within the Study Area are presented in tables 3.10 and 3.11 of the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA).

ID	Theme	Representation	Applicant's Response
			As described in ES Volume 1, Chapter 16 Ground Conditions [APP-052] “As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent”. 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 (secured by DCO Requirement 13). The Outline CEMP [APP-196] also requires that the Applicant undertake Hydrogeological Risk Assessment for trenchless crossings wherever these interact with Principal or Secondary A aquifers or pass beneath surface

ID	Theme	Representation	Applicant's Response
			watercourses or sensitive ecological receptors.
BEPS-279	Water Environment	The same is true of the Inspectorate's requirement for WFD assessment. The Inspectorate said that, given the likely significant effects and uncertainty around watercourse crossings and impacts on WFD waterbodies, the ES should provide a WFD assessment or screening assessment and agree the approach and findings with the statutory consultees. While a WFD appendix has now been produced, the EA's section 42 response remained concerned that watercourse crossings were still unknown in detail and highlighted the implications of culverts and crossings for chalk streams, geomorphology and WFD compliance. That indicates that production of a WFD document has not, in itself, resolved the underlying concern identified by PINS.	The ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] is based on information available at the time of the Application of the Scheme, and will be kept under review in line with new information and assessments which become available as part of the future ongoing design process for the Scheme, where this information may have relevance to WFD requirements and objectives.
BEPS-280	Water Environment	Finally, the Inspectorate also expected that information on battery fire risk and relevant mitigation, including fire-fighting and containment measures on the environment, should be set out in the Outline Battery Safety Management Plan. The EA's later section 42 response shows that this too remained unresolved in substance. It recorded that there were still no adequate measures to monitor and respond to pollutants from leaks and spills during operation at the BESS and substations, and insufficient provision for control of firefighting runoff from substation fires.	Since the preparation of the PEIR and EA Section 42 response to the PEIR, further detail on firewater runoff management containment measures has been provided both within the Outline Battery Safety Management Plan [APP-200] and Section 9 of ES Volume 3: Appendix 9.1 – Flood Risk Assessment and Outline

ID	Theme	Representation	Applicant's Response
		Accordingly, when the current application is measured against the Planning Inspectorate's scoping opinion, the position is not that the Inspectorate's requirements have been met and the matter can now be treated as closed. Rather, the core requirements identified by PINS, particularly in relation to private water supplies, flood risk, runoff, WFD effects and water resources, remain only partially satisfied, and in several respects remain substantively unmet.	Surface Water Drainage Strategy [AS-018]. It is noted that the EA have requested further clarification/information on the responding to leaks and spills and discussions will be undertaken with the EA in due course. If required, documentation will be updated at a later deadline. Section 2 of the Outline BSMP [APP-200] documents the Applicant's consultation with NFRS and Section 5 of the Outline BSMP [APP-200] covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Outline BSMP [APP-200] Section 4.5 documents the drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the

ID	Theme	Representation	Applicant's Response
			potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the Outline BSMP [APP-200] is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The Environment Agency (EA) is a statutory consultee for the Scheme, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A Statement of Common Ground between the Applicant and the EA will be submitted as part of the DCO process. The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032]. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS,

ID	Theme	Representation	Applicant's Response
			the Environment Agency, prior to the commencement of the works for the BESS. The BMSP will be substantially in accordance with the Outline BSMP [APP-200] .
BEPS-281	Water Environment	For these reasons, the Examining Authority is requested to treat private water supplies, groundwater protection, flood risk, runoff, drainage and water resources as principal examination issues. The applicant should be required to provide, at minimum: • A full receptor-specific private water supply assessment, including verified locations, abstraction type, abstraction depth/strata, supply use, and vulnerability classification for all supplies within the potential zone of influence, not merely within a 250m radius. • A hydrogeological conceptual site model and pathway assessment covering the principal infrastructure areas, especially Site 1/BESS/Grid Hub and Site 5, including groundwater flow direction, hydraulic connectivity, contaminant pathways and likely travel mechanisms to private supplies and watercourses. • Detailed pollution and firewater risk assessment for the BESS, National Grid Substation and 400kV substations,	The Applicant responds to each bullet point from the respondent in turn below: <u>Private water supply assessment:</u> An assessment has been undertaken of the risks to groundwater as a resource (including Private Water Supplies) from existing contamination in the ground. The assessment has been undertaken in accordance with the methodology agreed with the Environment Agency following Scoping, using a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The assessment is based on information provided by the Environment Agency, British Geological Survey and South Norfolk Council.

ID	Theme	Representation	Applicant's Response
		including containment failure scenarios, exceedance routing, emergency response assumptions and consequences for groundwater and private supplies. - Completed and finalised drainage and flood modelling for the principal infrastructure areas, including infiltration testing, overland flow and exceedance modelling, and demonstration that flood risk will not increase on site or elsewhere. - A revised significance assessment based on that evidence. Unless and until this evidence is provided, the applicant has not demonstrated that the Scheme would protect private water supplies, controlled waters, groundwater receptors, downstream water environments or local communities. Consent should therefore be refused.	It is noted that the Environment Agency themselves have not raised a similar comment in relation to the information presented. <u>Hydrogeological conceptual model:</u> The assessment of groundwater resources (including private water supplies) has been undertaken in accordance with the methodology agreed following scoping. A Conceptual Site Model is provided within the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] that supports ES Volume 1, Chapter 16 - Ground Conditions [APP-052] and will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA).

ID	Theme	Representation	Applicant's Response
			As described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] "As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent". <u>Firewater management for BESS:</u> The Design Principles, Parameters and Commitments [APP-213] Section 4.2 commits to the provision of a bunded surface or other form of containment system for the management of surface water runoff and firewater runoff for the BESS. <u>Drainage modelling:</u> The outline surface water network modelling undertaken as part ES Volume 3: Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] demonstrates no flooding up

ID	Theme	Representation	Applicant's Response
			to and including the 1 in 100 annual probability +45% rainfall event (design event required by the LLFA). The attenuation also includes additional volume for firewater runoff. Detailed surface water drainage design is secured through DCO Requirement 11. As such, given the above and with incorporation of the embedded mitigation proposed for the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198], the significance assessment presented within ES Volume 1: Chapter 9 – Water Environment [APP-045] and ES Volume 1: Chapter 16 – Ground Conditions [APP-052] is appropriate.
BEPS-282	Cultural Heritage	Chapter 10 Cultural Heritage Failure properly to assess the wider historic environment and historic landscape context The applicant's heritage assessment takes an unduly narrow approach to the receiving historic environment. Although the Environmental Statement and Heritage Statement tend to reduce the analysis to a relatively short list of 'scoped-in' designated assets, the applicant's own	The Applicant refers to its response to BEPS-285.

ID	Theme	Representation	Applicant's Response
		Statutory or Non-Statutory Sites or Features of Historic Environment Plan shows a much denser and more complex historic environment across the Order Limits and cable route corridor. The index plan identifies not only listed buildings, conservation areas, scheduled monuments and registered parks and gardens, but also a substantial spread of Historic Environment Record data mapped as HER points, polylines and polygons. That is important because it demonstrates that the Scheme lies within a layered historic landscape containing recorded archaeological and historic-environment features far beyond the limited subset of receptors ultimately carried forward in the applicant's setting analysis. This matters in two respects. First, it shows that the historic environment here is not confined to a handful of isolated designated assets. It is a dispersed, interconnected landscape of settlement, routeways, field systems, archaeological traces and historic buildings. The sheet-by-sheet mapping across the central parcels and cable route corridor shows repeated proximity between the Order Limits and recorded historic-environment features, including HER polygons and points surrounding or intersecting multiple parcels. That directly supports the concern that the applicant has atomised heritage assessment into a short list of individual receptors, rather than assessing the Scheme as an intervention within a coherent historic landscape.	

ID	Theme	Representation	Applicant's Response
BEPS-283	Cultural Heritage	Second, APP/2.11 materially weakens the applicant's attempt to minimise cable-route and non-designated heritage impacts. The plan shows the corridor passing through areas with nearby listed buildings, conservation areas and HER records, rather than through neutral or low-sensitivity land. That is inconsistent with any suggestion that the cable route can safely be treated as a minor, temporary or narrowly localised heritage issue. It also reinforces the objection that non-designated heritage and archaeological resource have been underweighted in the assessment, since the applicant's own mapping confirms a broad distribution of HER features across the Scheme area. In short, APP/2.11 demonstrates that the Scheme sits within a much denser and more continuous historic-environment resource than the chapter narrative implies. The applicant's methodology therefore appears to have scoped out too much, too early, and to have understated the degree to which the Order Limits and cable corridor affect a wider historic landscape, not merely a small number of selected designated assets. This is a material deficiency in the heritage assessment and should be given weight in examination of Chapter 10 and the planning balance.	Statutory or Non-Statutory Sites or Features of Historic Environment Plan [APP-015] does illustrate non-designated heritage assets recorded by Norfolk Historic Environment Record both within and immediately adjacent the Order Limits. ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021] provides further information on these HER records, and notes that many of the entries illustrated as polygons on these Figures represent artefact findspots resulting from fieldwalking and metal detecting surveys rather than historic features. However, the assessment does acknowledge that there is the high potential for prehistoric – modern periods remains to be present below-ground within distinct areas of the Cable Route Corridor, notably CRC4, CRC5, CRC6, CRC8, CRC9, CRC10, CRC11, CRC13, CRC14. The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 –

ID	Theme	Representation	Applicant's Response
			Archaeological Mitigation Strategy [APP-173], further stages of archaeological works will be carried out, including geophysical survey of the Cable Route Corridor. Informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHEs that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. This will include the Cable Route Corridor. The Applicant notes that the methodology employed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting document ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] was agreed with all statutory consultees at PEIR stage. This includes all study areas, as well as heritage receptors. Only heritage assets within an agreed distance of the Cable Route Corridor (including both listed buildings and Conservation

ID	Theme	Representation	Applicant's Response
			Areas) were included for assessment due to the scale of potential effects arising from construction and decommissioning activities within the Cable Route Corridor which, by their nature, will result in minimal impact to built-heritage assets, and will be inherently temporary.
BEPS-284	Cultural Heritage	Overview The cultural heritage case for East Pye Solar remains materially flawed. Although the Environmental Statement is fuller than the PEIR, the applicant's own documents continue to show a heritage assessment built on aggressive scoping-out, a visibility-led methodology, heavy reliance on future planting and year-15 conditions, incomplete definition of archaeological impacts, and substantial deferral of mitigation into later design stages. The result is that the Examining Authority is not presented with a stable, fully evidenced or lawfully secured assessment of likely heritage effects. These flaws are particularly serious because the Scheme sits in a dense and layered historic landscape, not an empty agricultural background. The applicant's own plans show listed buildings, conservation areas, scheduled monuments, registered parks and gardens, and extensive HER point, polyline and polygon data across and around the Order Limits and cable route corridor. The geophysical	The Applicant considers that ES Volume 1, Chapter 10 – Cultural Heritage, which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] and ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021] have been undertaken in accordance with the appropriate legislation, policies and guidelines and provides a historic and archaeological narrative of the landscape both within and adjacent the Order Limits. The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of

ID	Theme	Representation	Applicant's Response
		survey confirms long-term occupation and reuse of the landscape, identifying enclosures, field systems, trackways, occupation zones and ten key areas of archaeological activity, together with previously unrecorded archaeological interest. That wider context matters. Heritage effects here are not confined to a few isolated designated assets. They arise from intervention in an interconnected agricultural, archaeological and settlement landscape whose significance is cumulative and relational.	archaeological works will be carried out within the Scheme, including geophysical survey. Informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHEs that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. Further works may also be required within the Scheme, including geoarchaeological assessment and archaeological excavation, which has also been discussed within the Archaeological Mitigation Strategy.
BEPS-285	Cultural Heritage	The applicant's own methodology is too narrow, too elimination-led and too dependent on visibility filtering The Heritage Statement confirms that the applicant began with desk study, viewshed analysis and site visits and then used that process to scope out most assets before detailed assessment. It expressly says that only 51 designated assets and two non-designated assets were ultimately scoped in. That is the central methodological flaw.	The Applicant notes that the methodology employed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting document ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] was agreed with all statutory consultees at PEIR stage. It is correct that the Heritage Statement first began with desk study, viewshed

ID	Theme	Representation	Applicant's Response
		The scoping tables show numerous designated assets and conservation areas first identified as visible or potentially relevant and then excluded after site visit. The same methodology reduced non-designated heritage to only two scoped-in assets. This is not a genuinely holistic setting assessment. It is a narrowing exercise that appears to use visibility as the main gateway to significance. That approach is vulnerable in law and in planning judgment. Setting is not exhausted by present-day direct visibility. It includes spatial, historical, experiential and functional relationships, including settlement edge, route experience, church-farm-field associations, topography, landscape enclosure or openness, and the contribution of surrounding agricultural land to the significance of heritage assets and areas. The applicant's own figures reinforce the concern. The visibility-analysis maps in the heritage appendices show that 'viewed' receptors are being used to determine what gets carried forward for fuller assessment. This is especially problematic in a flat or gently rolling rural landscape where significance often lies in broad landscape relationships rather than dramatic direct intervisibility. PINS required the ES to contain a robust justification for study areas and sensitive receptors, with reference to recognised guidance and approaches such as ZTV, and to ensure that heritage assets and conservation areas with long views toward or from the site were identified and	analysis, and then site visits in order to determine which designated and non-designated-built-heritage assets would require further assessment. This approach is the one recommended within the Historic England's guidance documents <i>The Setting of Heritage Assets</i> (HE 2017), <i>Managing Significance in Decision-Taking in the Historic Environment</i> (HE 2015), and <i>Statements of Heritage Significance. Analysing Significance in Heritage Assets</i> (HE 2019). Heritage assets were only scoped out following the site visits once, using professional judgement, it was determined that the Scheme would result in no impact to their significance (including historic interest, architectural & aesthetic interest), including any significance resulting from their setting. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] includes assessments of historic landscape character. The Applicant considers that ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] has included all of

ID	Theme	Representation	Applicant's Response
		considered. Historic England likewise required ZTV-based identification of heritage assets whose setting may be impacted, heritage-specific viewpoints, and cumulative views across historic landscapes. The applicant's response to those requirements remains incomplete because the final heritage case still depends on excluding most receptors before substantive harm analysis is undertaken.	the points raised, with additional viewpoints also included within ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] .
BEPS-286	Cultural Heritage	The wider historic environment has been underassessed as a landscape-scale receptor The applicant's own mapping directly undermines the narrow receptor list. APP/2.11 and Figure 10.1 show that the Order Limits and cable route corridor lie within a dense spread of HER records as well as designated assets. The legend expressly includes HER points, HER polylines and HER polygons, demonstrating that the mapped historic environment is much broader than listed buildings and conservation areas alone. Sheet-by-sheet, the plans show the Order Limits repeatedly intersecting or lying adjacent to recorded historic-environment features and to clusters of listed buildings and conservation areas. This supports a central objection point: the applicant has atomised heritage assessment into a small group of selected receptors rather than assessing East Pye as development within a coherent historic landscape.	The Applicant notes that the methodology employed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting document ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] was agreed with all statutory consultees at PEIR stage. The Statutory or Non-Statutory Sites or Features of Historic Environment Plan [APP-015] and ES Volume 2, Figure 10.1 Statutory or Non-Statutory Sites or Features of the Historic Environment [APP-093] do illustrate non-designated heritage assets recorded by Norfolk Historic Environment Record both within and immediately adjacent the Order Limits. ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021]

ID	Theme	Representation	Applicant's Response
		The geophysical survey supports the same conclusion. It records prolonged human exploitation of the landscape across most of the site in the form of field boundaries, pre-mechanised cultivation, modern drainage, ponds, marl pits and occupation zones, and identifies ten key areas of archaeological activity. The archaeological resource is therefore landscape-scale and cumulative, not incidental.	provides further information on these HER records, and notes that many of the entries illustrated as polygons on these Figures represent artefact findspots resulting from fieldwalking and metal detecting surveys rather than historic features. The Applicant agrees that ES Volume 3, Appendix 10.3 – Geophysical Survey [AS-022] does identify a long duration of use and reuse of the landscape, with areas of occupation being recorded across the Scheme which possibly range in date from the late-prehistoric – modern periods. The subsequent scheme of trenching, as detailed in ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172] also notes a range of multi-period activity in those areas investigated. The archaeological resource is not considered to be incidental and, as indicated in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], and in agreement with NCCHEs, will continue to be investigated post-decision in a manner

ID	Theme	Representation	Applicant's Response
			proportionate to the cumulative impact of all elements of the Scheme.
BEPS-287	Cultural Heritage	Conservation areas and non-designated heritage remain materially underassessed The treatment of conservation areas remains one of the clearest weaknesses. Historic England identified a number of named conservation areas requiring attention, including Brooke, Saxlingham Green, Hempnall, Fritton and Wacton. At PEIR stage, PINS had already required robust treatment of conservation areas and long-view receptors. Yet the Heritage Statement's narrowing exercise scoped out almost all non-designated heritage, and much of the conservation-area townscape and group-value context, leaving only two non-designated assets formally scoped in. That is particularly problematic because conservation-area significance often depends substantially on unlisted buildings, walls, outbuildings, plot pattern, road alignment, settlement grain and historic relationship to surrounding agricultural land.	Brooke, Saxlingham Green, and Fritton Conservations were included for assessment in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]. As noted within the ES Chapter, Hempnall and Wacton Conservation Areas were assessed, and it was determined that they were not considered sensitive to the Scheme and were therefore scoped out of further assessment. As noted within Consultation Report [APP-024], further consultation was received from Historic England, and in their PEIR Response from August 2025, it is noted that they '<i>broadly agree with the scope and methodology of the cultural heritage and archaeology assessment</i>' as presented at PEIR stage, and further agree '<i>with the proposed extents of the study areas for different heritage assets and welcome the flexible approach based</i>

ID	Theme	Representation	Applicant's Response
			<i>on the Zone of Theoretical Visibility and ground-truthed walkover surveys.'</i>
BEPS-288	Cultural Heritage	The cable route corridor remains inadequately assessed and is still being defined too late The cable route is a major unresolved heritage weakness. The ES chapter says a 500m study area from the CRC boundary has been adopted for all heritage assets. But the broader evidential picture still shows that important aspects of cable-route heritage impact and mitigation are being left to later stages. Historic England's statutory consultation response stated plainly that the cable route required further assessment, including geophysics, trial trenching, treatment of HDD launch and reception pits, and consideration of bentonite slurry, archaeological and palaeoenvironmental impacts. Historic England listed 'further assessment of the cable route in order to develop an appropriate and informed approach to mitigation' as a specific concern. The Archaeological Mitigation Strategy does not close out that concern. It says the confirmed route of the CRC is still under investigation. It says full-width geophysical survey of the corridor will be undertaken to inform micro-siting of the cable trench and working area. It also says precise mitigation details cannot yet be determined because detailed design is not yet available.	Historic England (et al. 2026) <i>Archaeology and Solar Farms. Good Practice Guide</i> notes in para. 2.4.4 that 'when a full mitigation scheme cannot be drawn up at the time of application submission, it will need to be secured by planning conditions/DCO Requirements. Where assessment and design work is continuing post-determination, that work should inform the final scheme of mitigation via conditions/Requirements. It is recommended that at least an outline approach to mitigation is set out at application submission. This is needed both for the confidence of the decision maker and so that there is a reference point against which post-determination submissions for discharge of conditions/ Requirements for mitigation can be judged.' The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy

ID	Theme	Representation	Applicant's Response
		That is a material deficiency. A DCO application should not depend on post-application archaeological characterisation of the very corridor whose route, trench location and working width may still change in response to what is found. The visual material reinforces the point. The CR-VL4 heritage views at Parker's Lane show the cable route moving through open arable land at a lane junction associated with Long Stratton and the Long Stratton Conservation Area. The scheme-wide CRC maps show listed buildings, conservation areas and non-designated assets in close relation to the corridor. The corridor is therefore not a neutral underground strip. It passes through sensitive historic settlement, route and field-edge environments.	[APP-173], further stages of archaeological works will be carried out, including geophysical survey of the Cable Route Corridor. Informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHES that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. This will include the Cable Route Corridor.
BEPS-289	Cultural Heritage	Archaeology remains partly under-investigated and too much mitigation is deferred The Archaeological Mitigation Strategy openly acknowledges that major archaeological matters remain unresolved. It says the precise layout of cable trenches, inverter locations, pylons, access tracks, temporary working areas and depth of impact is not yet known, and therefore the precise details of mitigation cannot yet be determined. It says informative trenching at 3.5% by area is still required for known extensive impact areas such as substations, the BESS and working compounds, and that	Historic England (<i>et al.</i> 2026) <i>Archaeology and Solar Farms. Good Practice Guide</i> notes in para. 2.4.4 that 'when a full mitigation scheme cannot be drawn up at the time of application submission, it will need to be secured by planning conditions/DCO Requirements. Where assessment and design work is continuing post-determination, that work should inform the final scheme of mitigation via conditions/Requirements. It is recommended that at least an outline

ID	Theme	Representation	Applicant's Response
		further trenching elsewhere will depend on final detailed design. This is not a minor implementation detail. It means the scope, location and intensity of archaeological mitigation are still contingent on information not fixed at application stage. The AMS also confirms multiple areas of archaeological sensitivity where excavation or preservation in situ may be required, including Roman activity, medieval settlement, prehistoric activity, Roman ovens, a possible Roman building, prehistoric/Roman/medieval activity in Site 9, and the early medieval pottery production remains in Site 10. Those are not incidental constraints. They are a broad network of archaeologically sensitive zones across the scheme. The geophysics report and evaluation summaries show why this matters. Site 4 contains Roman and earlier activity, including Roman-aligned field systems and ovens. Site 5 contains features suggestive of medieval/early post-medieval settlement and ancillary manorial activity. Site 9 contains Neolithic, Iron Age, Roman and medieval occupation, including a possible roundhouse and a Roman pottery kiln. Site 10 contains a regionally significant early medieval pottery production complex. The applicant's own mitigation strategy states that any negative development impact on the regionally significant Site 10 pottery production remains will require full excavation or preservation in situ. It also describes those	<i>approach to mitigation is set out at application submission. This is needed both for the confidence of the decision maker and so that there is a reference point against which post-determination submissions for discharge of conditions/Requirements for mitigation can be judged.'</i> The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], in consultation with NCCHEs, further stages of archaeological works will be carried out within the Order Limits. As detailed in section 3 of ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], this includes those areas of archaeological sensitivity within Sites 4, 5, 9 and 10, with the extent and form of the mitigation to be balanced against the impact of the finalised detailed development plan. This includes, within Site 10, the potential for preservation

ID	Theme	Representation	Applicant's Response
		Site 10 remains as the only multi-kiln site of that industry known in the Eastern region. That is a substantial archaeological constraint.	<i>in-situ</i> , given the nature of the archaeological remains identified here.
BEPS-290	Cultural Heritage	Preservation in situ is not a settled mitigation outcome but a conditional later-design response The applicant places weight on preservation in situ, especially in relation to pile-supported panel structures. But the AMS makes clear that this is conditional, not fixed. It states that piling is treated as low impact only with the proviso that certain features, including structures, waterlogged remains, industrial features, high artefactual or environmental potential and human remains, would need to be avoided or fully excavated. It adds that this may require adjustment of pile layout or the targeted use of concrete feet rather than piles. That is not a fully designed mitigation package. It depends on later identification of sensitive archaeology and later redesign in response. It therefore does not cure the present uncertainty; it confirms it. The same applies to localised above-ground cabling and other preservation measures, which the AMS says will depend on later detailed design and informative trenching.	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 preservation in proportion to the significance of archaeological remains present. It is noted within para 2.4.5 of Historic England's (<i>et al.</i> 2026) <i>Archaeology and Solar Farms. Good Practice Guide</i> 'In cases where archaeological data-gathering (evaluation) is to continue post-determination, planning conditions/DCO Requirements should secure a process whereby such work is carried out as part of an agreed evaluation and mitigation strategy. The

ID	Theme	Representation	Applicant's Response
			<i>scope of such works would be defined within approved written scheme of investigation(s) (WSI). Results should iteratively inform an updated mitigation strategy.</i> In consultation with NCCHES, once the full details of the Scheme impacts are known, details on works such as geoarchaeological assessment (for piles and/or directional drilling), archaeological excavation, and preservation in-situ will be discussed and the Archaeological Mitigation Strategy will be updated accordingly.
BEPS-291	Cultural Heritage	Palaeoenvironmental and geoarchaeological issues remain unresolved, contrary to Historic England's advice Historic England's statutory consultation response was explicit that palaeoenvironmental and geoarchaeological potential needed to be addressed. It noted the absence of proper use of BGS borehole data, recommended GI testing and geoarchaeology to create a preliminary deposit model, and said further assessment of palaeoenvironmental and geoarchaeological deposits was required to inform the archaeological chapter, ES mitigation and cable-installation design. Historic England also pointed to peat, alluvium, head and river terrace deposits in Site 5, Site 7 and the cable route	The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of archaeological works will be carried out within the Scheme, including geophysical survey. Informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHES that the amount and location of any

ID	Theme	Representation	Applicant's Response
		corridor, and said these deposits may preserve archaeological and palaeoenvironmental evidence and potentially palaeolithic remains. The AMS does not show that this has been resolved. It says the need for and location of deep impacts are not yet known and therefore the need for and scope of geoarchaeological assessment cannot yet be firmly identified and will be agreed later with NCCHES. That remains a substantial deferral of a key part of the archaeological baseline and mitigation design.	additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. Further works may also be required within the Scheme, including geoarchaeological assessment and archaeological excavation, which has also been discussed within the Archaeological Mitigation Strategy. The archaeological works carried out thus far, as detailed in ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172], have not identified any significant peat deposits, though several organic deposits have been identified which are associated with previously mapped ponds within the Order Limits.
BEPS-292	Cultural Heritage	The setting assessment systematically understates harm by relying on screening, selective framing and year-15 conditions The heritage visual material shows how the low-harm case is actually being made. In the BESS-VL9 sequence, the winter baseline and year-1 images show large industrial elements inserted into an open rural view, while the year-15 image depends on matured screening to suppress	The Applicant notes the comments relating to impacts to heritage assets in the proximity of Site 1, Site 4 and Site 5 of the Scheme, as detailed in the representation, and these are addressed in detail in BEPS-293 – BEPS-297.

ID	Theme	Representation	Applicant's Response
		visibility. The Site 2-VL5 sequence does the same, with an open roadside and field view across the A140 toward Site 2A, overlaid in the photowire with substantial proposed development and vegetation outline. That pattern recurs across the heritage appendices. The applicant's position is often not that there is little change, but that change will be moderated or screened after years of planting growth. This is especially important for Moulton Farmhouse. The Heritage Statement accepts that views from the footpath across Sub-Site 1B are of interest and will be largely obscured by the Project Substation, giving rise to lower-end less than substantial harm. The dedicated HVL-2 sequences provide the visual basis for that point. This is not theoretical harm. It is a concrete example of the scheme interrupting a relationship currently experienced on the ground. The same criticism applies more widely at Site 4 and Site 5. The Site 4-VL9 and Site 4-VL2 views show open views across the sensitive parts of Sub-Site 4B from Church Lane and Long Stratton FP3. The Site 4-VL11 sequence places The Cedars, the A140 and adjacent open land in the same visual envelope. The Site 5-VL5 views show Church of St Catherine, associated listed buildings, Clay Cottage, The Street, PRow experience and the open agricultural edge beyond. These materials support the conclusion that the	

ID	Theme	Representation	Applicant's Response
		applicant underestimates wider settlement-edge and historic-landscape harm.	
BEPS-293	Cultural Heritage	Specific asset and place-based concerns Moulton Farmhouse and the Site 1 / substation area This is one of the clearest admitted cases of setting harm. The applicant accepts that footpath views associated with Moulton Farmhouse are of interest and will be largely obscured by the Project Substation. The visual material confirms that the change is real and experienced, not hypothetical.	In assessing harm, policy and guidance is clear that the level of harm ascribed is to the significance of the asset as a whole, not just to one specific element. Although the presence of solar PV arrays within parts of the wider settings of some designated heritage assets will constitute a change of land use, this is not considered to be of such significant effect as to materially affect or considerably devalue the significance of any identified heritage asset. Embedded mitigation within the Scheme including setbacks, removal of fields and landscaping proposals has been designed to minimise adverse effects on the settings of designated heritage assets and the demonstration of setting through views. Details of this are included in ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 – 168].

ID	Theme	Representation	Applicant's Response
			The proposals will result in a loss of a single vista of Moulton Farmhouse from PRow FP13, which transects Sub-Site 1B, due to the presence of the Substation here and associated screening proposals. Users of PRow FP13 travelling east already experience varying degrees of filtering of views towards Moulton Farmhouse as a result of intervening vegetation along the PRow and on field boundaries in the wider landscape. While this view is acknowledged as being important in illustrating the Listed Building's architectural interest and aesthetic value within its countryside setting, it is considered that the majority of the rural setting of the Farmhouse will be unaltered, and it is not considered that the glimpsed or heavily filtered views of Solar PV Panels or small sections of the Substation will impact the overall cohesiveness of this setting, so as to affect the significance of the Farmhouse. It was therefore concluded that there would be less than substantial harm at the lower end of

ID	Theme	Representation	Applicant's Response
			the scale, in terms of the NPSs EN-1 and EN-3, and a 'low level of harm' in NPPF (August 2026) terms, to this Grade II designated heritage asset.
BEPS-294	Cultural Heritage	Site 4, Stratton St Michael and Tasburgh Site 4 contains a particularly layered interaction of archaeology, setting and historic landscape. The group of Grade-1 Listed Stratton St Michael Church, The grade II* Old Rectory and its associated barn, are of particular importance. Also at site 4, trial trenching identified Roman-aligned field systems, Roman ovens, possible Roman structural remains, Beaker and Bronze Age activity, and medieval/post-medieval remains. The heritage views show open agricultural setting around Church Lane, FP3 and the adjacent settlement edge. The applicant's approach of excluding the most sensitive foreground strips and then concluding 'no harm' to the remaining wider setting is not convincing. Nor is the reduction of Tasburgh Hillfort's setting significance to archaeology alone. The HVL-3 sheets show the Scheduled Monument and Grade I Church of St Mary in the same broader historic landscape sequence.	Impacts to the five designated heritage assets situated south of Sub-Site 4B (one Grade I, one Grade II* and three Grade II Listed Buildings), were included in both ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 – 168]. As the Design of the Scheme progressed from PEIR stage, Solar PV Panels were removed from a number of fields to the north of this group of heritage assets. With these areas retained as either open green field or agricultural land. Proposed landscape mitigation, in the form of native broadleaf woodland, will be established c. 420m north of these assets, and any gaps in the existing north/south aligned hedgerow through the southernmost field will be infilled. These mitigation measures will result in no harm to the significance of these heritage assets and, in fact, the new

ID	Theme	Representation	Applicant's Response
			grassland to be established in the field north of the Church is considered to have a positive impact upon the setting of this asset, as it will enhance views south from FP3. Impacts to the Scheduled Camp in Village (NHLE 1003984) which is situated north of Sub-Site 4A, were also considered within both ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Assessment [APP-165 – 168]. While it is acknowledged that this Scheduled Monument is situated in a high topographical point in the landscape, suggesting intentional design and siting, due to the evolution of the landscape since the Iron Age/early-medieval periods, this monument is no longer a prominent feature within the surrounding environment, and is entirely screened by mature planting. Whilst the archaeological remains identified within Site 4 may contribute to the historic interests of the Scheduled Monument, it is not considered that they contribute to its

ID	Theme	Representation	Applicant's Response
			setting, nor are they considered to link to any other buildings within Stratton St Michael.
BEPS-295	Cultural Heritage	Site 5 / Fritton Site 5A revealed evidence of ancillary manorial activity and medieval material, including pits and ditches with dumped material, medieval pottery and a possible cobbled surface. The views at Site 5-VL5 show the relationship between grade 1 Listed Church of St Catherine, associated listed buildings, Clay Cottage, The Street, PRowS and the adjoining open land. This is a strong example of where the applicant appears to understate settlement-edge, group-value and route-based heritage effects.	The Applicant does not agree with the Consultee that the archaeological remains within Sub-Site 5A contribute to the character and appearance of Fritton Conservation Area, nor the significance of the Grade I Church of St Catherine (NHLE 1373281) and Grade II Listed Church Farm buildings (NHLE 1050259; 1050260), which lie within the northernmost part of the Conservation Area. As noted in ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172], evidence of medieval period activity has been identified within Sub-Site 5A. Their location within the north-western corner of Sub-Site 5A is south of an area identified by Norfolk Historic Environment Record as the site of Boyland Deserted Medieval Village (DMV) (HER 10168) and Boyland Hall (HER 39694), as detailed within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021].

ID	Theme	Representation	Applicant's Response
			Given the date and the position of the medieval remains within Sub-Site 5A, they are likely directly related with the Boyland DMV to the north and do not relate to Fritton Conservation Area, Church of St Catherine or Church Farm.
BEPS-296	Cultural Heritage	Site 8 / Brooke-side parcels The geophysics identified a probable Late Iron Age ladder settlement and other enclosure systems. The later trenching identified Neolithic, Iron Age, Roman and medieval occupation, including a possible posthole roundhouse and a Roman pottery kiln. The Site 9 visibility mapping in the heritage appendices identifies Brooke Conservation Area and nearby listed buildings as viewed receptors. This is not low-sensitivity background land.	The Applicant is assuming that the representation is referring to Site 9 rather than Site 8 here, with Site 9 the closest elements of the Scheme to Brooke. The Applicant does not agree that the archaeological remains within Site 9 contribute to the character and appearance of Brooke & Kirstead Conservation Area, nor the significance of the Listed Buildings within its boundaries. As noted in ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], a probable Late Iron Age ladder settlement has been identified within the north-eastern part of Site 9. In addition, ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172] identified that these remains attest to a multi-period

ID	Theme	Representation	Applicant's Response
			occupation activity within this area, spanning the Early-Neolithic – post-medieval periods. As noted within the Brooke and Kirstead Conservation Area Character Appraisal (SNC 2025), the character and appearance of the conservation area is largely related to Brooke's medieval/post-medieval linear village development, the former extent of the parkland surrounding Brooke House, as well as the small hamlet of Kirstead and Kirstead Hall grounds. These settlements represent well-defined boundaries, and it is considered that the archaeological remains identified within Site 9 do not contribute to the character and appearance of the conservation area.
BEPS-297	Cultural Heritage	Site 10 Site 10 is not merely a former RAF site or a peripheral archaeology parcel. It contains regionally significant early medieval pottery production remains, and the mitigation strategy itself accepts that negative development impact here would trigger excavation or preservation in situ. The heritage mapping also shows Site 10 in relation to built-	The Applicant agrees that the archaeological works carried out to date within Site 10 have revealed regionally significant remains relating to medieval pottery production, which is also acknowledged in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]. Both the Applicant and NCCHEs agree that

ID	Theme	Representation	Applicant's Response
		heritage receptors including Seething Conservation Area and Ditchingham Hall.	ground-works within these areas are likely to result in a negative impact upon archaeological remains and, in order to off-set this impact, a mitigation scheme will be put into place, likely comprising full-excavation or preservation in-situ. The mitigation works will only be determined once the Scheme design within Site 10 is determined and, as outlined with the present Archaeological Mitigation Strategy, a detailed Project Design will be supplied to NCCHEs for the works. The Applicant does not agree with the Consultee that the archaeological remains within Site 10 contribute to the character and appearance of Seething Conservation Area, nor the significance of the Grade I Listed Ditchingham Hall (NHLE 1153041), nor its Grade II Registered Park & Garden (NHLE 1000225). As noted within the Seething Conservation Area Character Appraisal (SNC 2019), the character and appearance of the conservation area is largely related to Seething's medieval/post-medieval linear village

ID	Theme	Representation	Applicant's Response
			development. This settlement, which lies c. 940m north-east of Sub-Site 10E, is of a well-defined boundary, and it is considered that the archaeological remains identified within Site 10 do not contribute to the character and appearance of the conservation area. Likewise, the Grade I Listed Ditchingham Hall, which is situated within a Grade II Registered Park and Garden, is situated 1.6km south-east of Sub-Site 10B. This heritage asset is also considered to be of a well-defined extent and does not draw any significance from the archaeological remains identified within Site 10.
BEPS-298	Cultural Heritage	11. Historic England's statutory consultation response remains highly relevant and is not fully answered by the ES Historic England's position at PEIR stage is important because many of its concerns remain only partly addressed. Historic England said further evaluation of non-designated archaeology was required, particularly in panel and substation areas, so that assets of policy-equivalent significance could be identified early and mitigated appropriately. The AMS confirms numerous sensitive zones and further trenching requirements.	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] tabulates the consultations carried out with Historic England, NCC HES and the SNC Senior Heritage & Design Officer after the production of the PEIR, which are further detailed in the Consultation Report [APP-024]. The Applicant notes that in Historic England's most recent consultation letter dated 10th June 2026 (Ref.

ID	Theme	Representation	Applicant's Response
		Historic England required fuller assessment of the cable route, geophysics and trial trenching for the corridor, and proper treatment of HDD, deep impacts and bentonite slurry. The AMS still leaves the CRC route under investigation and its mitigation dependent on later survey and micro-siting. Historic England required palaeoenvironmental and geoarchaeological assessment, including deposit modelling and integration of GI testing and borehole data. The AMS still postpones the need and scope of geoarchaeology until later once deep impacts are known. Historic England required mitigation to be specified in the ES and secured through appropriate DCO mechanisms supported by a suitable requirement, Outline WSI, REAC and CoCP. Yet the AMS states that written schemes will only be appended as the project reaches each phase of works, and that exact mitigation areas will only be defined after further survey, trenching and detailed design. Historic England also required heritage-specific viewpoints and cumulative views across historic landscapes. The later heritage appendices respond only partially to that request	PL00797992), they state <i>'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, and a robust approach to mitigation has been proposed.'</i> They further note <i>'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 not be commenting on this matter in detail and will defer to the LPA and their expert and specialist advisors.'</i> The Applicant acknowledges that at present, they are still awaiting the full written representation from Historic England. The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy

ID	Theme	Representation	Applicant's Response
		and still present a case dominated by selective visibility analysis and future screening.	[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 preservation in proportion to the significance of archaeological remains present. The LVIA, as seen in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], has been undertaken in accordance with the principles and guidance set out in the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) and is based on the Scheme parameters which form the Application. The assessment includes consideration of cumulative landscape and visual effects and applies a transparent and proportionate methodology to the evaluation of effects.

ID	Theme	Representation	Applicant's Response
			View locations were identified through a combination of desk-based analysis, fieldwork and consultation with relevant stakeholders to ensure that the assessment considers a representative range of visual receptors and likely effects. The Applicant considers that the selected view locations provide an appropriate basis for assessing the significance of visual effects, and the location of the heritage viewpoints were provided to Historic England for comment prior to their production.
BEPS-299	Cultural Heritage	The applicant's case does not sit comfortably with the Planning Inspectorate's Scoping Opinion PINS required a robust justification for study areas and sensitive receptors, and required that assets and conservation areas with long views to or from the site be identified and considered. The applicant's methodology still narrows the field too aggressively. PINS stated that temporary construction compounds could not be ignored until locations and receptors were known. The archaeological mitigation strategy still says many	The Applicant notes that the methodology employed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting documents ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] and ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021] was agreed with all statutory consultees at PEIR stage. This includes all study areas, as well as heritage receptors. Since PEIR stage, the utilized heritage viewpoints were

ID	Theme	Representation	Applicant's Response
		temporary working areas and exact impacts are not yet fixed. PINS required indirect decommissioning impacts on designated and non-designated heritage assets to be assessed because insufficient information had been provided to scope them out. The ES says it has assessed decommissioning impacts, but the AMS still defers decommissioning strategy to a later agreement with NCCHEs. PINS required cumulative schemes to be properly identified and mapped in relation to the proposal. Historic England separately requested inclusion of adjacent overlapping solar/BESS projects such as Tasway Energy Park, High Grove, The Drovers and Long Stratton BESS. That cumulative historic-landscape point remains important. There are also multiple housing developments in the area that should equally be taken into account.	provided to Historic England prior to the completion of the Heritage Statement, and Historic England did not provide any additional comments on the locations. The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and 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 preservation in proportion to the significance of archaeological remains present. Para. 3.6 of this document states that <i>'areas of known extensive impact (Substation, BESS, working compounds) will be subject to informative trenching at 3.5% by area.'</i> Para. 3.8.4 of Historic England's (2026) <i>Archaeology and Solar Farms. Good Practice Guide</i> notes that <i>'Specific methods for decommissioning</i>

ID	Theme	Representation	Applicant's Response
			<i>works cannot be determined at the application stage. While an application could outline potential mitigation methods for decommissioning, these should remain flexible and would ultimately be secured through a decommissioning Environmental Management Plan, to be approved by the Local Planning Authority prior to works taking place.'</i> The guidance further notes in section 4.10: Operation and Decommissioning, para 4.10.2 '<i>Solar farm developments are consented for a fixed duration, after which they will be decommissioned. As very few solar farms have yet been decommissioned it is not possible to list every potential impact here. However, uninstalling panel supports, removing cabling or re-landscaping drainage features (for example) could all have potential archaeological impacts in the future. Each should be carefully considered within decommissioning documentation that is submitted with applications or developed during the lifetime/at the end of the life of these schemes. How</i>

ID	Theme	Representation	Applicant's Response
			<i>these are secured through planning conditions/agreements will require discussion between the applicant and the determining authority, and is beyond the scope of this document.'</i> ES Volume 3, Appendix 2.4 – Cumulative Schemes [APP-116] notes that cumulative impacts to High Grove, The Drovers and Long Stratton BESS were considered, while Tasway Energy Park was not, as the Scheme has been placed on indefinite hold. Section 10.11 of ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] concluded that there would be no cumulative effects with these three Schemes, as there are no heritage assets, archaeological remains, or other elements of the historic environment whose setting encompasses the Sites and the other Schemes.
BEPS-300	Cultural Heritage	Cumulative and in-combination heritage effects are understated Historic England expressly said cumulative views across historic landscapes should be taken into account and named adjacent solar/BESS projects that should be	ES Volume 3, Appendix 2.4 – Cumulative Schemes (APP-116) notes that cumulative impacts to High Grove, The Drovers and Long Stratton BESS were considered, while Tasway Energy Park was not, as the Scheme

ID	Theme	Representation	Applicant's Response
		included in cumulative assessment. PINS also required cumulative schemes to be properly agreed and mapped. This is important because the heritage harm at East Pye is not only asset-specific. It is cumulative across a broad rural landscape already facing multiple solar, BESS and related infrastructure and housing proposals. The effect on significance may therefore arise not merely from one parcel viewed in isolation, but from the progressive industrialisation of a historic agrarian landscape and settlement network.	has been placed on indefinite hold. Section 10.11 of ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] concluded that there would be no cumulative effects with these three Schemes, as there are no heritage assets, archaeological remains, or other elements of the historic environment whose setting encompasses the Sites and the other Schemes. In ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056], no significant residual effects upon cultural heritage assets are predicted during the Construction, Operation & Maintenance, or Decommissioning Phases of the Scheme.
BEPS-301	Cultural Heritage	Conclusion Taken together, the applicant's own heritage documents show a case that is more developed than at PEIR stage but still materially deficient. The historic environment has been narrowed too aggressively; non-designated and conservation-area context has been underassessed; the cable route remains incompletely characterised; archaeological mitigation remains dependent on later	The Applicant notes that the methodologies employed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting document ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021] were agreed with all statutory consultees at PEIR stage. They have been

ID	Theme	Representation	Applicant's Response
		surveys and later design; preservation in situ is conditional and not yet a settled outcome; palaeoenvironmental and geoarchaeological issues remain unresolved; and the visual case relies heavily on selective visibility analysis and future planting maturity rather than genuinely slight impact. The Examining Authority should therefore attach limited weight to the applicant's low-harm heritage conclusions unless and until the outstanding baseline, assessment and mitigation issues are fully resolved and secured.	undertaken in accordance with the legislation, planning policy and professional guidelines and provide an assessment of the known and potential archaeology within the Order Limits, as well as an assessment of historic landscape character. They are supported by a scheme of archaeological works, including ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 to AS-024] and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172], which provide further context to the archaeological and historic history of the Scheme. As outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of archaeological works will be carried out within the Scheme, including geophysical survey. Informative trenching will be undertaken within the

ID	Theme	Representation	Applicant's Response
			remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHES that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. Further works may also be required within the Scheme, including geoarchaeological assessment and archaeological excavation, which has also been discussed within the Archaeological Mitigation Strategy. ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168], which has also been undertaken in accordance with the appropriate legislation, planning policy and professional guidelines and provide an assessment of potential impacts to the significance and settings of built-heritage assets, including designated and non-designated buildings, Scheduled Monuments, and Conservation Areas. The scope of the assessment were also agreed with statutory consultees at PEIR stage.

ID	Theme	Representation	Applicant's Response
BEPS-302	Cultural Heritage	Remedies sought The Applicant should be required to provide, before examination proceeds materially on Chapter 10, a revised and fully integrated cultural heritage package that: finalises and evidences the cable route archaeological and heritage assessment; completes any outstanding geophysical survey, informative trenching and geoarchaeological/deposit-modelling work necessary to define likely impacts; revises the historic-landscape and setting assessment so that it is not visibility-led and properly addresses conservation areas, non-designated heritage and route-based effects; provides a robust cumulative heritage assessment including adjacent overlapping solar/BESS projects identified by Historic England and required by the Scoping Opinion; and secures mitigation through clear DCO requirements and an adequately detailed Outline WSI, including treatment of deep impacts, HDD, bentonite slurry, preservation in situ, scientific sampling, decommissioning and post-excavation/publication obligations. In the absence of that material, the Examining Authority should treat Chapter 10 as incomplete and give it reduced weight.	The Applicant refers to its response to BEPS-283 and BEPS-287.
BEPS-303	Transport and Access	Chapter 11 - Transport and Access Introduction The Applicant has not demonstrated that East Pye Solar can be constructed, operated, repaired, repowered and eventually decommissioned without serious and	The transport and access strategy has been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047] , ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177] , the Outline Construction

ID	Theme	Representation	Applicant's Response
		inadequately resolved effects on the local highway network, the Public Rights of Way network, promoted walking routes, rural lanes, residential amenity and public safety. The transport and access case is spread across the Outline Construction Traffic Management Plan, the Outline Operational Traffic Management Plan, the Outline Public Rights of Way and Permissive Paths Management Plan, and the Access and Public Rights of Way Plan. Read together, these documents do not present a fixed, fully assessed and examination-ready solution. Instead, they reveal a scheme dependent on widespread access creation, numerous crossings, extensive temporary management, multiple closures, abnormal load arrangements, and substantial post-consent refinement. This is not a compact or self-contained project. The Outline CTMP identifies 65 construction access and crossing points across the Sites and Cable Route Corridor. The PRow management plan identifies 84 PRows within or abutting the Order Limits, comprising 71 footpaths, 9 restricted byways and 4 bridleways, together with impacts on Boudicca Way and Via Beata. The very scale of the required access intervention shows that the existing rural network is not naturally suited to a project of this size and fragmentation.	Traffic Management Plan (Outline CTMP) [APP-201] and the Outline Public Rights of Way and Permissive Paths Management Plan (Outline PRowPMP) [APP-203]. The number of proposed construction accesses reflects the geographic nature of the Sites and the need to access individual parcels; however existing access points have been utilised where practicable. Internal haul routes are also proposed to minimise impacts on the Local Highway Network. The transport assessment and access strategy has been informed by ongoing engagement with Norfolk County Council as the Local Highway Authority. As set out in ES Volume 1, Chapter 11 - Transport and Access [APP-047] construction activities will be staggered across the programme, and therefore construction activities and sites will not all be active simultaneously.

ID	Theme	Representation	Applicant's Response
			Impacts on PRow have been assessed within the Outline PRowPPMP [APP-203]. Within this, appropriate management and mitigation measures are proposed, including for any PRow requiring temporary medium-term closures. The Applicant considers that the proposed transport and access arrangements, together with the identified mitigation measures, provide a robust and deliverable framework for the construction, operational and decommissioning phases, while also effectively managing effects on the highway and PRow network.
BEPS-304	Transport and Access	The transport and access solution remains outline only and depends on post-consent detail A central objection is that the transport and access case remains fundamentally deferred. The CTMP expressly states that the detailed CTMP will be produced later and that key matters will only be confirmed through detailed design or contractor appointment, including final construction activities, final internal haul route alignments, final CRC access arrangements, the final number of AIL movements, and further information regarding highway	The proposed management and mitigation measures for the Scheme are set out within the ES and secured through the suite of outline management plans submitted as part of the application. In relation to transport and access, the assessment and mitigation are set out in ES Volume 1, Chapter 11 - Transport and Access [APP-047], supported by

ID	Theme	Representation	Applicant's Response
		works on or adjacent to the public highway. It also states that later submissions may include programme of works, method statements, detailed technical drawings, Stage 1/2 Road Safety Audit and contractor details. The same pattern appears in the PRoW plan. It states that the detailed PRoWPPMP will follow later under a DCO Requirement, that further information on closures will only be available after appointment of the Principal Contractor and final construction methodology, and that the duration of closures and the 'open but managed' status of routes are indicative only and subject to change.	ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177], the Outline CTMP [APP-201] and the Outline PRoWPPMP [APP-203]. The detail contained within the outline management plans will be developed further through detailed management plans which will be submitted to and approved by the relevant planning authority in accordance with the Requirements contained within the Draft DCO [AS-032]. The detailed plans will be substantially in accordance with the approved outline plans and will secure the environmental mitigation measures identified through the ES. The Draft DCO [AS-032] requires the Applicant to identify whether any detailed management plans would give rise to materially new or materially different environmental effects compared with those reported in the ES. The Applicant therefore considers that an appropriate framework is in place to ensure the mitigation

ID	Theme	Representation	Applicant's Response
			assessed as part of the Application is carried forward into the final approved management plans.
BEPS-305	Transport and Access	The OTMP repeats the same approach for later life-cycle phases. It states that the detailed OTMP will be a 'live' document, updated before scheduled replacement activities, and that the vehicle trip estimates for replacement are indicative and will be refined later. It further states that if the current routes are no longer suitable, alternative routes will simply be agreed later with the highway authority. For a project with extensive interactions with narrow rural roads, footpaths, restricted byways, promoted trails and replacement traffic over decades, that degree of deferral is not acceptable. The Examining Authority is not being asked to assess a fixed transport and access solution, but a framework whose decisive safety and deliverability detail is postponed to later approval. This is reinforced by Norfolk County Council's own consultation record. NCC repeatedly sought more detailed proposals, trip distribution, access strategy, closure information and mitigation, especially for the most sensitive areas. NCC's November 2025 targeted consultation response stated that the proposed access strategy was	The Outline Operational Traffic Management Plan (Outline OTMP) [APP-202] is intended to be updated prior to scheduled replacement activities. This reflects the operational life of the Scheme and the practical reality that replacement activities may occur several years after the completion of the construction phase. The detailed OTMP will therefore ensure that replacement activities take account of prevailing highway conditions, operational requirements and any changes to the Local Highway Network at the time the works are undertaken. The Applicant has continued to engage with NCC throughout the application process and continues to work proactively on the development of the access strategy. The assessment of transport, including associated mitigation measures presented within

ID	Theme	Representation	Applicant's Response
		unacceptable and that the information provided was inadequate in multiple places.	the Outline OTMP [APP-202] and Outline CTMP [APP-201] reflect this ongoing engagement. The Applicant notes the comment regarding outline reports. The Applicant refers to its response to BEPS-304.
BEPS-306	Transport and Access	The scheme relies on constrained rural roads which the Applicant's own evidence describes as sensitive and difficult The Transport Assessment's own highway network description is highly revealing. It describes Bussey's Loke / The Green as single carriageway and single track with overhanging trees, varying widths and potentially challenging two-way movement, subject to a 7.5 tonne restriction except for loading. It describes Fairstead Lane as single carriageway and single track with overhanging trees and potentially challenging for two-way vehicle movements. It describes Fylands Road similarly. It describes Littlebeck Lane / Mill Lane as varying in width and potentially challenging for two-way vehicle movements. It describes Shotesham Road / Woodton Road / Baxter's Lane as having varying widths, one-way access at some junctions and challenging two-way movement. It notes Shotesham Ford with potential flooding and inaccessibility	The Local Highway Network has been assessed in detail in ES Volume 1, Chapter 11 - Transport and Access [APP-047] and ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]. The Applicant recognises that some local roads are rural in character, vary in width, and pose challenges with respects to two-way movements and weight restrictions. These characteristics were identified at an early stage and informed the development of the access strategy and the assessment of transport effects. During the design process, consideration was given to limiting construction traffic movements through local communities, including Hempnall,

ID	Theme	Representation	Applicant's Response
		on Mill Lane / Norwich Road. It notes schools on The Street / Broaden Lane corridor. These are not robust industrial haul roads. They are quiet, narrow rural lanes with multiple physical and environmental constraints. That baseline description comes from the Applicant's own assessment and supports the objection that the project is fundamentally mismatched to the road network on which it depends.	Brooke, and Saxlingham Nethergate, as far as practicable. Internal haul routes have also been proposed to reduce the use of the Local Highway Network as far as practicable. The proposed access strategy has been developed in consultation with NCC as the Local Highway Authority. Site access design, vehicle tracking, and swept-path analysis has been undertaken to assess the suitability of proposed access arrangements. These are provided in Appendix C of the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]. A range of management and mitigation measures are proposed within the Outline CTMP [APP-201] to minimise impacts on the Local Road Network. These include the use of a vehicle booking system, vehicle holding areas, construction traffic routeing measures and, where required, localised Highway Works to support the safe movement of construction vehicles.

ID	Theme	Representation	Applicant's Response
			The assessment of transport concludes that, with the proposed mitigation in place, the Local Highway Network can accommodate the traffic generated by the construction phase. A detailed CTMP will be secured through Requirement 15 of the Draft DCO [AS-032] and developed in consultation with the relevant authorities prior to construction.
BEPS-307	Transport and Access	The baseline traffic flows on many affected roads are extremely low, which makes the local impact more serious, not less The Applicant's own ATC data records very low baseline traffic on many of the roads now proposed for scheme access, routing, restriction or management. The TA records an AADT of 82 on Fairstead Lane (west), 103 on Littlebeck Lane, 134 on Shotesham Road, 67 on The Green, 67 on Wash Lane, 53 on Bussey's Loke, 31 on Market Lane and 41 on Edge's Lane. The Applicant uses those low baselines to explain away large percentage increases as a mathematical consequence of low traffic volumes. But the planning reality is the opposite. Roads with such low baselines are plainly quiet, local and sensitive. Introducing repeated HGV traffic, worker traffic, passing-place engineering, traffic	ES Volume 1, Chapter 11 - Transport and Access [APP-047] assesses the likely effects on the highway network from associated construction movements. The assessment methodology, as detailed in section 11.5 of the Chapter, is aligned with industry-standard IEMA Guidance for defining sensitivity of each respective link and measuring effects in relation to severance, delay, amenity, fear, safety and hazardous and large loads. Links requiring further assessment due to exceeding defined IEMA Guidance thresholds are detailed in section 11.8 of the chapter. The conclusions of this

ID	Theme	Representation	Applicant's Response
		marshals and stop boards onto them changes their character much more fundamentally than it would on an already busy arterial route. The low baseline therefore strengthens, rather than weakens, the case that the effects on amenity, tranquillity, equestrian use, PRow enjoyment and rural character are substantial.	further assessment evidence that none of the identified links have significant adverse effects on the road network with respects to severance, delay, amenity, fear, safety and hazardous and large loads. The assessment is supported by management and mitigation measures as detailed in the Outline CTMP [APP-201] which minimise effects on the Local Road Network. The Applicant notes that the construction phase is temporary and activities at each respective site will be staggered across the programme. It is therefore not anticipated that each site will be active simultaneously. The Applicant has evidenced a robust assessment of effects on the Local Highway Network and has provided a suite of management and mitigation measures which have been developed through consultation with NCC. These measures are detailed within the

ID	Theme	Representation	Applicant's Response
			Outline CTMP [APP-201] and the Outline PRowPPMP [APP-203] .
BEPS-308	Transport and Access	The Applicant's own figures show major percentage increases on local roads The Transport Assessment expressly identifies significant percentage increases during peak construction. Table 9.2 shows 115.51% on Fairstead Lane, 57.98% on Shotesham Road, 44.76% on Bussey's Loke, 48.48% on Market Lane, 25.62% on Littlebeck Lane, 19.62% on Fylands Road and 18.01% on B1527 near Woodton. The TA then acknowledges that some links exceed IEMA thresholds, including Fairstead Lane, Shotesham Road, Bussey's Loke and Market Lane. The scheme's own assessment shows very large local traffic effects on the very roads that are least suited to absorb them. The Applicant then seeks to minimise those effects by stressing that the roads are rural with low flows, but that simply confirms their sensitivity. It does not demonstrate that the effects are acceptable. The same issue appears in the technical notes for Sites 7G-L, 8A-B and 9. Those notes again identify high percentage changes on Shotesham Road, Bussey's Loke and Market Lane, and then propose one-at-a-time vehicle release, vehicle size restrictions, passing places, temporary speed reductions and traffic marshals as the	The Applicant notes the concerns raised regarding forecast traffic increases on a number of local roads during the construction phase. The effects of construction traffic have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Whilst certain links exceed the initial IEMA screening thresholds, this forms part of the assessment process and triggers further detailed assessment. As set out in section 11.8 of the Chapter, the further assessment concluded that none of these links would experience significant adverse effects with respect to severance, delay, amenity, fear, safety and abnormal and large loads. The management measures identified within the Outline CTMP [APP-201], including vehicle management and traffic control measures, represent robust construction traffic mitigation and have been incorporated into the

ID	Theme	Representation	Applicant's Response
		response. Those mitigation measures are not evidence that the roads are suitable; they are evidence that the roads are not suitable for normal construction traffic without intensive controls.	assessment. The Applicant does not consider that the need for such measures demonstrates that the roads are unsuitable for construction traffic. The Applicant therefore considers that the likely effects on the Local Highway Network have been robustly assessed and that, with the proposed mitigation in place, the effects would not be significant.
BEPS-309	Transport and Access	The project requires an exceptionally high number of accesses, crossings and highway interventions The Outline CTMP identifies 65 construction access and crossing points to the Sites and CRC. It also states that highway works will support movement on narrower sections of the local road network and that constrained sections may require enhancement through passing places or temporary traffic management. The Access and Public Rights of Way Plan visually confirms the breadth of this intervention. Across its 19 sheets, it maps construction and operational access points, PRowS to be temporarily closed, PRowS to remain open but managed, and numerous places where access points sit directly on or adjacent to PRowS. It shows that the	The transport and access strategy has been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047], ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177], the Outline CTMP [APP-201] and the Outline PRowPPMP [APP-203]. The number of proposed construction access points reflects the geographic conditions of the Solar PV Sites and associated infrastructure. Where practicable, existing field access points have been utilised to minimise the need for new access arrangements. Internal haul routes are also proposed

ID	Theme	Representation	Applicant's Response
		transport and access problem is not confined to one locality, but distributed across the whole scheme from Great Moulton and Tivetshall through Long Stratton / Morningthorpe / Hempnall and eastwards towards Woodton, Shotesham and Site 10. This is important because it demonstrates that the scheme depends on the active reconfiguration and management of a very large rural access environment, rather than simple use of a robust pre-existing highway system.	to reduce the use of the Local Highway Network where practicable. The Applicant acknowledges that some localised highway works, and traffic management measures may be required during construction. These measures have been identified through the assessment process and are intended to facilitate the safe movement of construction traffic, maintain highway safety and minimise disruption to road users and local communities. The interaction with the PRoW network has also been assessed. Where temporary closures or management measures are required, appropriate mitigation is proposed, including signage, alternative routeing, and measures to maintain safe access for users. All PRoW to be temporarily closed will be reopened once construction activities in the respective area are complete. The Applicant therefore considers that the proposed access arrangements and any associated highway

ID	Theme	Representation	Applicant's Response
			interventions form part of a robust and deliverable access strategy which has been developed in consultation with NCC as the Local Highway Authority and assessed through the Application.
BEPS-310	Transport and Access	The internal haul route strategy itself demonstrates the unsuitability of the local road network The Applicant presents internal haul routes and waiting points as mitigation. They are also evidence of an underlying access problem. The CTMP states that internal haul routes were proposed in response to consultation feedback from the highway authority and local residents to minimise impacts on the local road network. It also proposes temporary construction compounds at Sub-Sites 4A and 10C as waiting points from which vehicles are called forward, with only one HGV at a time being released towards certain sites and traffic marshals using stop boards where necessary. That is an implicit admission that parts of the local road network cannot safely accommodate ordinary two-way construction flows without tightly controlled release arrangements. A road system that needs waiting compounds, one-at-a-time HGV dispatch, marshals and stop boards is a constrained network, not one naturally capable of absorbing a major NSIP construction programme.	The Applicant notes the comments regarding internal haul routes and management measures. As set out in Section 11.7 of ES Volume 1, Chapter 11 - Transport and Access [APP-174] construction routes were developed through an assessment of available routes to each Sub-Site, taking account of factors including settlements, existing access points, PRow, highway restrictions and visibility requirements. The access strategy also sought, where practicable, to limit construction traffic through communities such as Hempnall, Brooke and Saxlingham Nethergate. The inclusion of internal haul routes is not an indication that the highway network is unsuitable. Rather, they have been incorporated as embedded mitigation to minimise the use of the

ID	Theme	Representation	Applicant's Response
		This is especially relevant around Fairstead Lane, The Krons, Broaden Lane, Bussey's Loke, the roads serving Sub-Sites 7A-F and 7G-L, and the Shotesham / Woodton area serving Sub-Sites 8A-B and Site 9.	Local Road Network for movements between construction areas and limit effects on road users and the local community. Internal haul routes between Sub-Sites 7A-F, 7G-L and 8A-B reduce the need for construction traffic to travel between these areas via the public highway. Similarly, vehicle holding areas, delivery scheduling, traffic marshals and other traffic management measures form part of the mitigation set out within the Outline CTMP [APP-201]. These measures are intended to manage vehicle movements, reduce interactions with other road users, and minimise transport effects during construction. The assessment presented within ES Volume 1, Chapter 11 - Transport and Access [APP-174] takes into account these mitigation measures and concludes that there would be no significant adverse effects on the Local Highway Network. The Applicant therefore considers that the proposed

ID	Theme	Representation	Applicant's Response
			measure demonstrates a proactive approach to reducing impacts on local roads, rather than evidencing that the network is incapable of accommodating the Scheme.
BEPS-311	Transport and Access	The scheme depends on extensive temporary road closures and lane restrictions that are still not final The CTMP lists a large number of roads currently under consideration for temporary road closure or lane closure, including Frith Way / Lodge Road, Common Road, Wood Lane, Parker's Lane, Hall Lane, Mill Road, Edge's Lane, Church Lane, Brick Kiln Lane / Devil's Loke, Boylandhall Lane, The Street, Fairstead Lane, Broaden Lane, Bussey's Loke, The Green, Fylands Road, Field Lane, Lundy Green, Spring Lane, Alburgh Road, Wash Lane, Market Lane, Brooke Road, Baxter's Lane, Shotesham Road, Woodton Road, Littlebeck Lane, Harvey Lane and Seething Road. Crucially, the document states that the precise sections and distances remain subject to further engagement and detailed design and that the listed links are not final. That uncertainty is material. The real effects of the scheme on residents, farms, schools, emergency access, equestrian movement and rural circulation will depend heavily on exactly where and for how long those closures occur. Yet the public and decision-maker are still not given a final closure package.	The Applicant acknowledges that the exact extent and duration of temporary traffic management measures will be refined through detailed design and in consultation with NCC. This is reflected within the outline plans (including the Outline CTMP [APP-201] and Outline Public PRoWPPMP [APP-203]). The locations identified represent roads where temporary traffic management may be required to facilitate access or for cable trenching. The precise extend and duration of measures will be determined in detailed design and in further consultation with NCC. Measures are detailed within the Outline CTMP [APP-201] including provision of diversionary routes, maintaining emergency access and undertaking trenchless crossing on major roads.

ID	Theme	Representation	Applicant's Response
		The Access and Public Rights of Way Plan reinforces the point by mapping multiple start and end points of temporary PRoW closures across many sheets, especially around Sites 1, 2, 3, 4B, 5, 7, 8 and CRC4/6/8/12/14. Closure is not a minor contingency. It is built into the scheme's access logic.	The detailed management plans will be substantially in accordance with the approved outline plans and are secured through the Requirements contained within Schedule 2 of the Draft DCO [AS-032]. The Applicant considers that the likely significant effects of temporary road and PRoW management measures have been appropriately assessed and that a robust framework is in place to secure the necessary mitigation prior to construction.
BEPS-312	Transport and Access	Construction traffic levels remain substantial and industrial in character The CTMP estimates a peak daily total for the Sites of 69 HGV arrivals plus 69 HGV departures and 205 car/LGV/shuttle arrivals plus 205 departures. It separately estimates peak daily CRC compound traffic of 33 HGV arrivals plus 33 departures, 15 LGV arrivals plus 15 departures, and 30 car/shuttle arrivals plus 30 departures. These are substantial traffic flows for a widely dispersed scheme relying on rural roads, construction compounds, cable trenching and numerous access points. The CTMP also states that, for reasonable worst-case assessment, it assumes all construction activity occurs simultaneously. It	The Applicant notes the comment regarding scale of construction traffic associated with the Scheme. As noted by BEPS, the assessment adopts a reasonable worst-case scenario which assumes that all construction activities across the Scheme will take place simultaneously. In practice, construction activities will be staggered across the programme, as set out in the Outline CTMP [APP-201].

ID	Theme	Representation	Applicant's Response
		is therefore essential that the transport and access assessment genuinely addresses that worst-case scenario across all affected routes, villages, PRoWs and promoted trails.	The assessment was taken in accordance with IEMA Guidelines and links exceeding relevant thresholds were subject to further detailed assessment, which concluded there would be no significant adverse effects in relation to severance, delay, amenity, fear, safety or hazardous and large loads. The Applicant therefore considers that a robust worst-case assessment has been undertaken and demonstrates that, alongside measures set out in the Outline CTMP [APP-201] and Outline PRoWPPMP [APP-203], the effects of construction traffic would not be significant.
BEPS-313	Transport and Access	The road condition survey is too limited to provide proper accountability The Applicant includes road condition survey as part of the mitigation package. However, the CTMP also indicates that the survey focus is on the local road network, while major strategic links are not meaningfully included where scheme-attributable HGV effects are said to be difficult to isolate. The practical result is that some of the very roads that will carry repeated HGV traffic may not be subject to	As set out in the Outline CTMP [APP-201] , pre and post construction road condition surveys will be undertaken on relevant parts of the Local Road Network, with the scope agreed in consultation with NCC as the Local Highway Authority. Any highway defects reasonably attributable to construction traffic associated with the

ID	Theme	Representation	Applicant's Response
		the same before-and-after accountability. That is unsatisfactory in a project which itself anticipates highway edge works, passing places, street furniture removal and construction traffic over a prolonged period.	Scheme would be rectified to the satisfaction of the Local Highway Authority. The Applicant notes that A and B roads already accommodate existing traffic including significant HGV movements, and therefore it may not be possible to reasonably attribute any changes in highway condition solely to the Scheme. The proposed approach is therefore focused on those local roads where construction traffic effects can be appropriately monitored and assessed. The Applicant considers that the proposed survey methodology, together with the commitment to rectify any Scheme-related defects identified, provides a proportionate and robust mechanism for managing potential impacts on highway condition during construction.
BEPS-314	Transport and Access	Norfolk County Council's own position shows that key highway objections were not resolved NCC's November 2025 targeted consultation response is one of the clearest and strongest documents in the	The Applicant notes the comments regarding NCC's target consultation response. The Applicant has engaged extensively with NCC as the Local Highway Authority throughout the

ID	Theme	Representation	Applicant's Response
		evidence base. It states that the highway authority has 'significant concerns regarding the proposed access strategy' and considers the proposed access strategy in the targeted consultation "unacceptable." It says access to the highway network should be limited to new junctions on B roads with the sites served via internal haul routes. NCC also states that it would not accept construction traffic using Hall Lane. It says Fairstead Lane is not appropriate and that all construction traffic should use a haul route from the B1527. It says the authority will not accept a new access on the A140 for Site 2 and instead expects haul routeing from Station Road using CRC2 and CRC3. It says AILs should use roads of an appropriate standard, namely A and B roads, to reach site access points and then haul routes within the site. Those are not minor technical comments. They show that, as of November 2025, Norfolk CC did not accept major parts of the Applicant's construction access strategy.	application process and continues to do so. The access strategy presented within the Application has been developed and refined in response to consultation feedback received from NCC. Whilst the Applicant has sought to maximise the use of internal haul routes and access from a and b roads where practicable, physical and environmental constraints mean that this is not feasible for all parts of the Scheme. The proposed access strategy has therefore sought to identify the most practical and deliverable access arrangements whilst minimising effects on local communities. The internal haul routes proposed form a key part of the construction routeing and are accompanied by the suite of manage measures outlined in the Outline CTMP [APP-201] and the PRoWPPMP [APP-203]. The Applicant continues to engage with NCC on these matters and

ID	Theme	Representation	Applicant's Response
			consultation feedback is being addressed in the ongoing Statement of Common Ground discussions, alongside further engagement regarding the access strategy, mitigation measures and traffic management measures.
BEPS-315	Transport and Access	Hall Lane remains a live objection because NCC rejected it but the later TA still relies on it NCC's November 2025 response expressly states that the highway authority 'will not accept any construction traffic using Hall Lane.' Despite that, the later Transport Assessment still routes CRC Compound 2 via Hall Lane. Table 6.2 gives 'Compound 2: Hall Lane' using access A14, from Ipswich Road eastbound on Hall Lane and south onto A14. The AIL routing section repeats Hall Lane as part of the anticipated AIL route for CRC Compound 2. That is a direct inconsistency between the later Applicant case and the highway authority's previously stated position. It demonstrates that key objections were not resolved before submission. The mapping is outdated and relies on the pre-bypass configuration of Hall Lane. The new bridge cannot take the	The Applicant notes the comments regarding Hall Lane. The Applicant is also aware of the Long Stratton Bypass and this has informed the development of the access strategy and transport assessment. The Applicant confirms that Hall Lane would be used for AIL movements only and would not form a route for general HGV or LGV traffic. As such, vehicle movements on this route would be limited in frequency. AIL movements have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047], ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177] and the Outline CTMP [APP-201], including route assessments and vehicle tracking.

ID	Theme	Representation	Applicant's Response
		weight of the AILs described and the new road alignment will not accommodate an AIL.	The Applicant has continued to engage with NCC throughout the application process and discussions on transport matters remain ongoing. The Applicant has specifically liaised with NCC regarding the Hall Lane overbridge and NCC has confirmed that the bridge is capable of accommodating the size and weight of the proposed AIL vehicles. Accordingly, the Applicant considers the bridge suitable for the proposed AIL movements.
BEPS-316	Transport and Access	AIL routeing remains highly problematic and continues to rely on unsuitable local roads and sensitive areas The TA identifies AIL movements for multiple substations, the BESS and CRC compounds. It says the final number of AIL movements will be confirmed later and that the final port of entry remains under consideration between Felixstowe and King's Lynn. It identifies provisional highway works land at Station Road, Ipswich Road, Hall Lane and Church Hill, with temporary mitigation potentially requiring removal of street furniture, pruning or removal of vegetation, temporary protection	The Applicant notes the comments regarding AIL routeing. Comments regarding Hall Lane are addressed in BEPS-314. AIL movements have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047], ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177] and the Outline CTMP [APP-201], including route assessments and vehicle tracking. AIL movements would be managed by specialist haulage

ID	Theme	Representation	Applicant's Response
		measures and oversailing or overrun outside the carriageway. NCC's November 2025 response to the targeted consultation insists that AILs should use roads of an appropriate standard, namely A and B roads, and then internal haul routes. It does not support use of unsuitable local routes. Yet the Applicant's later material still routes AILs along local roads including Hall Lane and still proposes associated physical intervention. The AIL routes still pass through conservation areas. If the Applicant continues to rely on local historic routes and sensitive settlements for abnormal loads, with associated vegetation removal and street works, that compounds the transport objection with a heritage and townscape objection. The transport case has not demonstrated that AIL movements can be accommodated in a way that avoids unacceptable harm.	contractors and subject to detailed route planning and traffic management measures prior to movement. The Applicant has sought to maximise the use of A and B roads wherever practicable. However, due to the physical nature of the Scheme and site-specific constraints, some sections of the Local Road Network are required. The proposed AIL strategy is being developed through consultation with NCC and includes management measures to facilitate the safe movement of AILs and minimise effects on local communities and road users. The assessment concludes that, with the proposed mitigation measures in place, effects associated with hazardous and large loads would not be significant.
BEPS-317	Transport and Access	The traffic baseline is internally inconsistent and uses outdated mapping in places The TA's study area expressly includes the Long Stratton Bypass. The CTMP also routes traffic by reference to the Long Stratton Bypass / Parker's Lane roundabout.	The Applicant is aware of the opening of the Long Stratton Bypass, and this has informed the preparation of the access strategy. As shown in ES Volume 2, Figure 11.1 - Indicative

ID	Theme	Representation	Applicant's Response
		However, other figure material has used older mapping that omits the bypass. Norfolk's own LLFA comments in November 2025 say the applicant was using outdated base mapping and had not recently visited the area because the maps used did not contain or consider the now operational Long Stratton Bypass. The bypass is part of the real post-2025 network. If some figures rely on pre-bypass mapping while routeing assumptions elsewhere depend on the bypass, the transport evidence is not internally coherent.	Transport and Access Study Area [APP-094], the bypass is included within the study area. This is additionally indicated within the routeing figures in ES Volume 2, Figures 11.2 to 11.8 - Likely and Suitable Routes to the Scheme [APP-095], alongside acknowledgement within the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177] and ES Volume 1, Chapter 11 - Transport and Access [APP-047]. The OS basemaps presented on plans and figures do not affect the assessments provided as part of the Application. Nonetheless, at Deadline 1 the Applicant intends to update the OS basemaps of the Works Plan and the main suite of other plans submitted with the Application. In the meantime, the Land Plan [APP-006] submitted with the DCO Application already shows the Long Stratton bypass on the OS basemap. Please refer to the Land

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			Plan to view the proximity of the Long Stratton Bypass with the Order Limits.
BEPS-318	Transport and Access	The traffic survey coverage is selective and appears weakest on the roads where impacts are most acute The traffic survey location figures show 30 ATC locations and a single MCC location spread across the study area. Survey coverage exists on principal approaches and selected local links, but not every lane that later appears in the CTMP, Streets Plan or PRow management plan as a closure route, diversion route, managed crossing route or sensitive local access corridor. That means the baseline evidence is relatively stronger on strategic approaches and weaker on the small rural roads where the most intrusive effects are actually expected to occur. For a scheme that depends on numerous closures, diversions, one-at-a-time HGV lanes and PRow-adjacent routes, that is a notable weakness in the assessment approach.	As shown in ES Volume 2, Figures 11.2 to 11.8 - Traffic Survey Locations [APP-096], the traffic survey locations cover both the local and major road networks, and have been used within the trip generation and distribution forecasts detailed in ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Following the initial 20 ATC surveys commissioned, an additional 10 surveys were commissioned following consultation feedback. These surveys provided additional depth on the highway network and substantially cover the study area. Traffic data was additionally collected from WebTRIS for National Highways links on A47 and A11. The Applicant therefore considers that the survey coverage and Study Area sufficiently assesses existing network

ID	Theme	Representation	Applicant's Response
			conditions and effects from construction vehicle movements.
BEPS-319	Transport and Access	The PRoW impacts are scheme-wide, not incidental The Outline PRoWPPMP identifies 84 PRoWs within or abutting the Order Limits, including 71 footpaths, 9 restricted byways and 4 bridleways. The Access and Public Rights of Way Plan maps those routes sheet-by-sheet across the whole scheme. It shows affected rights of way running through or alongside Sub-Sites 1A, 1B, 1C, 2A, 2B, 3, 4B, 5A, 5B, 7C, 7D, 7E, 7F, 8A, 8B, 9, 10B and the CRC. This is therefore not a peripheral access issue. It is a core scheme impact. The layout has been imposed across a landscape already threaded by a dense public access network, and the application shows that public access will repeatedly be crossed, managed, diverted or closed to make the project work.	The effects on PRoW have been assessed within the Outline PRoWPPMP [APP-203], alongside ES Volume 1, Chapter 11 - Transport and Access [APP-074]. The Applicant acknowledges that the Scheme interacts with a number of PRoW across the Order Limits, reflecting the extensive existing network within the area. The assessment has identified where PRoW may be affected and sets out appropriate management and mitigation measures, including signage, traffic marshal support, speed restrictions, alternative routeing where required, and the management of temporary closures. These measures are designed to minimise disruption and maintain safe access for users wherever practicable. The Applicant notes that the assessment adopts a reasonable worst-case scenario, assuming all construction activities occur

ID	Theme	Representation	Applicant's Response
			simultaneously. In practice, construction activities will be staggered across the programme. The detailed PROW management measures will be developed through the final PROW and Permissive Paths Management Plan, secured through the Requirements of the Draft DCO [AS-032] , and will be substantially in accordance with the outline plan.
BEPS-320	Transport and Access	Numerous PROWs face medium-term closure and many more are only 'open but managed' The PROW management plan identifies many medium-term closures, including Brooke FP6; Great Moulton FP13 and FP14; Hempnall FP2, FP25 and FP28; Long Stratton FP3 and FP4; Morningthorpe FP5, FP9 and FP11; Saxlingham Nethergate FP11, FP12, FP13, FP14 and FP27; Shotesham FP19 and FP22; and Tivetshall St Margaret FP2 and RB6. It also identifies several routes that will remain open but managed, including Great Moulton FP15, Great Moulton RB18 and RB19, Hempnall FP3 and FP5, Saxlingham Nethergate FP10 and FP9, and Tivetshall St Margaret FP8. The management measures themselves show the seriousness of the interaction. They include signage, vehicle-yield requirements, widened access tracks where applicable, banksmen or marshals, 5–10 mph speed limits,	The Applicant notes the comments regarding PROW closures and managed routes during the construction phase. An Applicant response regarding PROW management measures is detailed in BEPS-318. The need for the management measures identified within the Outline PROWPPMP [APP-203] does not indicate unacceptable effects on the PROW network, rather they form part of a proactive management strategy that has been assessed within the ES. The assessment within the Outline PROWPPMP [APP-203] alongside ES Volume 1, Chapter 11 - Transport

ID	Theme	Representation	Applicant's Response
		and keeping routes clear only so far as practicable. That is not equivalent to unaffected enjoyment of a PRow. It is evidence that the scheme will introduce regular construction traffic conflict onto public paths. The Access and Public Rights of Way Plan visually confirms both categories, showing multiple paths marked either for temporary closure or for continued but managed use, for example around Saxlingham Nethergate / Hempnall and around Great Moulton / Tivetshall.	and Access [APP-047] evidence that, with the proposed mitigation in place, effects on PRow users would not be significant. The Applicant also notes that construction activities are temporary in nature, and activities will be staggered across the programme, therefore reducing the extend of concurrent effects on the PRow network.
BEPS-321	Transport and Access	The proposed diversion routes are often via roads and lanes and are not equivalent mitigation Table 4.2 of the PRow management plan shows that many medium-term closures would be diverted via roads and lanes rather than equivalent traffic-free or field-edge alternatives. Brooke FP6 would be diverted via Littlebeck Lane. Hempnall FP25 and FP28 would be diverted via Spring Lane, Lundy Green and Workhouse Lane. Long Stratton FP3 and FP4 would be diverted via Brick Kiln Lane, Church Lane and FP5. Morningthorpe FP5, FP9 and FP11 would be diverted via The Street, FP17, School Road, RB4 and the B1527. Shotesham FP19 would be diverted via Fylands Road, Wash Lane and Market Lane. Shotesham FP22 would be diverted via Market Lane and Brooke Road. Tivetshall St Margaret FP2 would be diverted via the B1134, FP1 and	The Applicant acknowledges that temporary closures of PRow require diversions, some of which are on local roads. These measures are temporary in nature and for the construction phase. The indicative construction programme set out in the Outline CTMP [APP-201] demonstrates that construction activities will be staggered across the programme and as such PRow closures and diversions will be temporary and localised to the relevant construction activities. The diversion routes identified within the Outline PRowPPMP [APP-203] have been developed to maintain

ID	Theme	Representation	Applicant's Response
		Great Moulton RB19. Tivetshall St Margaret RB6 would be diverted via Frith Way, Great Moulton FP12 and Wacton RB31. That is not equivalent mitigation. A diversion onto rural roads or lanes changes the character, safety and attractiveness of the route. It is especially unsatisfactory where the original PRow offered off-road passage or recreational value that the road-based diversion cannot replicate. Furthermore, the majority of our PRow are used directly because our lanes and roads do not have pavements and are therefore not safe for pedestrians. Closing PRow particularly risks cutting off outlying houses and hamlets from neighbouring villages.	connectivity where temporary closures are required. In addition, mitigation measures including signage, traffic marshal support, speed restrictions, and advance notification of closures are proposed to minimise disruption to users. The Applicant recognises that diverted routes may not replicate all characteristics of the existing PRow, however the proposed measures provide a practicable means of maintaining access during temporary construction activities. The detailed PRow management arrangements will be developed through the final PRow and Permissive Paths Management plan secured through the requirements of the Draft DCO [AS-032].
BEPS-322	Transport and Access	Promoted route impacts, especially Boudicca Way, remain unresolved The PRow management plan identifies direct intersections with both Boudicca Way and Via Beata in CRC4 and suggests that any closure of these sections would be so limited that no diversion would be necessary. However, Appendix A to the same plan records Norfolk County	The Applicant notes the comments regarding the potential effects of the Scheme on promoted routes, including Boudicca Way and Via Beata. The potential effects on PRow have been considered within the Outline PRowPMP [APP-203]. Where

ID	Theme	Representation	Applicant's Response
		Council's concern that more detail was needed, especially for promoted trails, and specifically refers to the impact of construction traffic on Fairstead Lane, which forms part of Boudicca Way. NCC's comments state that this would be "a big issue" for the trail, note the possible need for stop-work controls at the Site 7A entrance, and say that more detail is needed on current usage, significance of impact and diversion options. The Access and Public Rights of Way Plan also shows Boudicca Way aligned through the affected area around Morningthorpe FP2 / CRC4 and Via Beata crossing the CRC4 / Tivetshall / Great Moulton area. The promoted-route issue is therefore not confined to a single technical crossing; it is part of a wider access and movement problem across the route corridor.	temporary closures or diversions are required, these have been identified together with the measures proposed to maintain access during the construction period. The Outline PRowPMP [APP-203] establishes the framework for managing PRow during construction, with further detail to be provided through the detailed PRow and Permissive Paths Management Plan following consent, once the detailed construction programme and methodologies have been established. The comments provided by NCC have been taken into account by the Applicant and will inform the preparation of the detailed PRow and Permissive Paths Management Plan. Accordingly, the Applicant does not consider that the treatment of Boudicca Way or Via Beata represents an unresolved omission within the application documentation. Rather, it reflects the level of detail that can reasonably be provided at this stage of

ID	Theme	Representation	Applicant's Response
			the DCO process, with further detail to be developed following consent and the establishment of the detailed construction programme.
BEPS-323	Transport and Access	The Applicant's own consultation record shows NCC wanted much more detail than has been provided Appendix A to the PRow management plan records NCC's request for 'much more detail around the length of closures', including not just individual routes but complete closures of groups of connected PRow, and discussions on how impacts would be reduced. It also records NCC's concern about Fairstead Lane and Boudicca Way and the need for trails-team input. Yet the final outline document still says the durations are indicative only, subject to change after contractor appointment, and that more detail will come later in the detailed PRowWPPMP. This supports the objection that the application has not provided the level of access detail that its own host authority said was needed.	The Applicant notes the comments regarding the level of detail contained within the Outline PRowWPPMP [APP-203] and the consultation undertaken with NCC. As recorded within the consultation feedback, NCC sought additional information regarding the duration of PRow closures and the management of impacts on users. The Applicant acknowledges that the Outline PRowWPPMP [APP-203] provides indicative closure durations at this stage. The level of detail that can reasonably be provided at the application stage is influenced by the level of certainty available regarding the detailed construction programme. More detailed information regarding the precise timing and duration of individual closures would be dependent on the appointment of a contractor and the

ID	Theme	Representation	Applicant's Response
			finalisation of construction methodologies following consent. The Outline PRowPPMP [APP-203] therefore establishes the framework for the management of PRow during construction, with further detail to be provided within the detailed PRow and Permissive Paths Management Plan following consent. This is a standard approach within the DCO process, whereby outline management plans are submitted with the application and subsequently developed in greater detail pursuant to DCO Requirements once the detailed construction programme has been established. The comments provided by NCC have been taken into account by the Applicant and will inform the preparation of the detailed PRow and Permissive Paths Management Plan. The provision of additional detail through the detailed plan therefore reflects the stage of project development, rather than a deficiency in the application documentation.

ID	Theme	Representation	Applicant's Response
BEPS-324	Transport and Access	The access baseline itself still appears unsettled and internally inconsistent The PRoW management meeting notes refer to 88 PRoWs having been identified within the scheme, whereas the submitted outline plan says 84. While not decisive on its own, this inconsistency adds to the impression of an access case still evolving. A similar inconsistency appears in the wider transport material. The CTMP expressly relies on the Long Stratton Bypass / Parker's Lane roundabout for Site 2 and CRC routeing, yet other figure material has used older mapping that omits the bypass. That reinforces concern that the transport/access baseline has not been presented in a consistent and fully updated way.	The Applicant notes the comments regarding the number of PRoW identified within the application documents. The PRoW management meeting referred to in the representation took place on 3 October 2025, whereas the Outline PRoWPPMP [APP-203] was submitted with the application on 5 March 2026. During this period, the Scheme continued to evolve through ongoing design development and consultation. The purpose of the meeting was to inform the ongoing development of the Scheme and seek feedback on the emerging proposals. As the design subsequently progressed, updates were made across a number of disciplines, which resulted in the final identification of 84 PRoW within the Scheme area. The Outline PRoWPPMP [APP-203] and associated application documents are consistent in their use of this figure. Accordingly, the Applicant does not consider the difference between the

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			figures recorded in the October 2025 meeting notes and the subsequently submitted application documents to indicate an inconsistency in the assessment. Rather, it reflects the continued refinement of the Scheme between the date of the meeting and the submission of the application. The meeting notes were provided as a record of engagement undertaken during the development of the Scheme and not as the definitive description of the final proposals. The Applicant is aware of the opening of the Long Stratton Bypass, and this has informed the preparation of the access strategy. As shown in ES Volume 2, Figure 11.1 - Indicative Transport and Access Study Area [APP-094], the bypass is included within the study area. This is additionally indicated within the routing figures in ES Volume 2, Figures 11.2 to 11.8 - Likely and Suitable Routes to the Scheme [APP-095], alongside acknowledgement within ES Volume

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			3, Appendix 11.1 - Transport Assessment [APP-174 to 177] and ES Volume 1, Chapter 11 - Transport and Access [APP-047].
BEPS-325	Transport and Access	The scheme includes a second major traffic phase during operation The Outline OTMP confirms that the operational phase is not limited to occasional maintenance visits. It assumes one full solar panel replacement during the scheme life, likely after about 40 years, lasting up to 24 months. It also states that the BESS could be replaced up to five times during the operational phase and that transformers may require replacement once. This is highly material because the OTMP then quantifies this 'operational' replacement phase as involving, on a reasonable worst-case basis, an average of 50 HGV trips per day across the network during solar panel replacement, with 100 total daily HGV arrivals and departures, plus replacement staff traffic averaging 43 cars and 6 shuttles daily, rising in the peak month to 80 cars and 10 shuttles. This is not minor maintenance traffic. It is effectively a second construction-style phase. The OTMP further states that replacement access will use the construction-phase access network and confirms retained operational access across the scheme, including Frith Way, Fairstead Lane, Broaden Lane, Bussey's Loke,	The Applicant notes the comments regarding replacement activities during the operational phase. The Applicant does not agree that replacement activities represent a second construction phase. Replacement activities would primarily comprise the replacement of existing infrastructure rather than the construction of the Scheme from the outset. Please refer to Section 3.2 of the Outline OTMP [APP-202] for a description of the replacement activities anticipated to occur. The cable route corridor, which has sections crossing agricultural land, would not be reconstructed as part of replacement activities and would remain in place following construction for the duration of the Scheme. Please refer to the Outline Cable Route Construction Statement [APP-216]

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		Fylands Road, Woodton Road, Littlebeck Lane, Harvey's Lane and others. This shows that the impacts of opening up the rural access network are not truly temporary. The scheme is designed to retain much of that access infrastructure for decades and reuse it for repowering and replacement. This suggests that the haul roads crossing agricultural land will also be retained, causing long term impacts on agricultural activity.	for further information on the cable route corridor. The Applicant refers to its response to BEPS-326 regarding the timing, duration and nature of replacement activities.
BEPS-326	Transport and Access	Operational and replacement routeing and mitigation are also deferred The OTMP is even more deferential than the CTMP. It says the detailed OTMP will be a live document updated before scheduled replacement activities, to reflect changes in vehicle routes and the wider local road network. It says the vehicle trip estimates are indicative only and will be refined and updated later, and that if the construction routes are no longer suitable, alternative routes will be agreed later with the highway authority. The same applies to workforce management. The OTMP says a Replacement Activities Worker Travel Plan will be prepared later, secured through the detailed OTMP, with measures such as car sharing, shuttle buses and sustainable travel encouragement identified only at outline level. So, the worker-traffic solution for this major replacement phase is not assessed in any fixed or detailed way now.	The Applicant acknowledges the comments regarding the level of detail contained within the Outline OTMP [APP-202] in relation to replacement activities. The detailed OTMP will be developed at a later stage. As set out in Paragraph 4.1.1 of the Outline OTMP [APP-202], solar PV panel replacement is anticipated to be an infrequent activity, the programmed replacement of all panels has been assessed as occurring only once during the 60-year operational lifespan of the Scheme, approximately 40 years after the commencement of operation. Given the long timescales involved, it is not currently possible to accurately

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			predict the future baseline conditions that would influence replacement activities, including traffic conditions, highway layouts, vehicle technology, travel behaviour and wider changes to the local highway network. Accordingly, the Outline OTMP [APP-202] establishes a framework for the management of replacement activities, while allowing the detailed arrangements to be developed closer to the time of implementation when the prevailing conditions are known and can be appropriately considered. This approach ensures that any replacement activities are planned having regard to the actual conditions that exist at the time, rather than relying on assumptions regarding circumstances that will not arise for several decades. The Outline OTMP [APP-202] therefore identifies the types of mitigation and management measures that may be required, with the detailed OTMP and Replacement Activities Worker Travel Plan providing the opportunity to refine those

ID	Theme	Representation	Applicant's Response
			measures when replacement activities are programmed.
BEPS-327	Transport and Access	Replacement and operational impacts on PRowWs are also built into the scheme The OTMP simply imports the PRowW management measures from the construction phase for replacement activities, including signage, yielding, marshals, 5–10 mph speed limits and keeping routes clear only so far as practicable. The PRowW plan likewise states that the effects on PRowWs and permissive paths during replacement will be managed in the same way as construction. This means the Applicant's own operational traffic document confirms that the replacement period would recreate the same type of conflict with PRowWs and permissive paths as the initial construction phase. The access harm is therefore not limited to the first build-out; it is embedded into the whole life of the scheme.	The Applicant notes the comments regarding the potential effects of replacement activities on PRowWs. The Applicant does not agree that such effects would be present throughout the operational life of the Scheme. The measures referred to within the Outline OTMP [APP-202] and the Outline PRowWPPMP [APP-203] would only apply during periods when replacement activities are taking place. Although replacement activities may extend over a period of up to 24 months, they would be substantially less intensive than the initial construction phase as they relate to replacing existing infrastructure rather than constructing the Scheme from the outset. Paragraph 3.2.2 of the Outline OTMP [APP-202] states that any significant environmental effects associated with replacement activities would be mitigated through measures similar to those identified for construction. These

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			measures are intended to minimise impacts on PRow and permissive path users during periods of active works. Many of the measures referred to in the representation, such as marshals, temporary traffic management and signage, are temporary in nature and would only be implemented while replacement works are being undertaken. Accordingly, the Applicant does not agree that access impacts would be embedded throughout the life of the Scheme. Any impacts, and the mitigation measures associated with them, would be limited to specific periods of construction and replacement activity.
BEPS-328	Transport and Access	New permissive paths do not offset the permanent and temporary harms to the established public network The PRow management plan proposes three new permissive paths, in Sub-Sites 7F, 8B and 10B. While these may provide some local benefit, they are not equivalent to definitive PRows. They are permissive rather than permanent public rights, tied to the scheme's operational life, and the same document confirms they will cease at decommissioning. They therefore cannot be	No permanent closures of PRow are proposed as part of the Scheme, and any PRow temporarily affected during construction would be reopened following completion of the relevant works. The permissive paths proposed provide an additional benefit during the operational phase of the Scheme and

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		treated as full compensation for the scheme's disruption to the established PRow network and promoted trails.	are supplementary to the existing PRow network. They are not relied upon as mitigation for any permanent loss of PRow access. The effects on PRow users, including temporary closures and diversions during construction, have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047] and the Outline PRowWPPMP [APP-203]. The assessment concludes that, with the proposed management and mitigation measures in place, effects on PRow users would not be significant.
BEPS-329	Transport and Access	The scheme affects routes near sensitive community receptors, including schools and settled lanes The Access and Public Rights of Way Plan shows several affected rights of way and road-based diversion areas close to settlements and community facilities. Examples include the Hempnall / Saxlingham Nethergate area with affected PRowWs and access points near Hempnall Primary School and the Fairstead Lane / Broaden Lane corridor; the Long Stratton / Morningthorpe / Fritton / CRC4 area with multiple temporary closures and crossings around a dense path and road network; and the eastern scheme area around Woodton / Hedenham / Seething with affected	The Applicant notes the comments regarding the interaction between the Scheme and sensitive receptors. Sensitive receptors are identified in ES Volume 1, Chapter 11 - Transport and Access [APP-047] and are included within the assessment in alignment with IEMA Guidelines. The Applicant recognises that some PRow in the vicinity of settlements and community facilities may be

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		routes and accesses near established settlements and lanes. These are not abstract planning effects. Rights-of-way diversions onto roads, increased construction and replacement traffic, and 'open but managed' path crossings alter how residents, walkers, school users, horse riders and recreational users can move safely through the area.	temporarily affected during construction. However, mitigation measures including signage, traffic marshal support, reduced vehicle speeds, alternative routeing, and management of construction traffic movements are proposed to maintain accessibility and minimise disruption. The assessment adopts a reasonable worst-case scenario, assuming all construction activities occur simultaneously. In practice, construction activities will be staggered across the programme, reducing the extent of concurrent effects on local communities and PRow users. The assessment concludes that, with the proposed mitigation in place, the resulting effects would not be significant.
BEPS-330	Transport and Access	The cumulative assessment remains narrow and unconvincing The TA considers a small group of cumulative schemes and concludes that cumulative impacts do not exceed IEMA thresholds on the major corridors considered. But this remains a corridor-based and percentage-based	The cumulative assessment presented within ES Volume 1, Chapter 11 - Transport and Access [APP-047] considered the effects of the Scheme alongside other relevant developments in accordance with the agreed

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		exercise. It does not grapple adequately with cumulative effects on the local rural network, cumulative severance where several roads and PRowS are restricted in the same locality, or cumulative stress on villages and users where multiple infrastructure projects interact. Norfolk's own earlier comments specifically raised cumulative concerns, including with other major infrastructure.	assessment methodology. Cumulative schemes with respect to traffic and transport (which were not already inherent within TEMPro in the future baseline calculations) were also agreed with NCC as the Local Highway Authority. Where screening thresholds were exceeded, further assessment was undertaken considering severance, delay, amenity, fear, safety and delay. The cumulative assessment identified only one link requiring further assessment and concluded that there would be no significant cumulative adverse effects. The assessment also represents a reasonable worst-case scenario, as it assumes overlap with peak construction traffic from other developments. In addition, construction activities across the Scheme will be staggered throughout the programme, reducing the potential for concurrent effects on local roads, communities and PRow users. The Applicant therefore considers that cumulative transport

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			effects have been appropriately assessed and would not be significant.
BEPS-331	Transport and Access	The Applicant's conclusion of no significant transport impact is not borne out by its own evidence The TA concludes that the scheme is acceptable from a transport and access perspective and that impacts are not significant. Yet the same TA confirms 65 access points, extensive reliance on constrained rural lanes, very large percentage increases on several sensitive local roads, an unresolved AIL strategy, a major replacement traffic phase, and significant reliance on later CTMP, OTMP, CWTP and PRow detail. It also acknowledges that some links exceed IEMA thresholds. When that evidence is read together with NCC's consultation record and targeted consultation response, the conclusion of acceptability is not persuasive.	Whilst the assessment in ES Volume 1, Chapter 11 - Transport and Access [APP-047] identifies links that exceeded initial IEMA (now ISEP, however the guidance remains referred to as the 'IEMA guidance') thresholds, these were subject to further detailed assessment in accordance with IEMA Guidelines. This assessment concluded that there would be no significant adverse effects in relation to severance, delay, amenity, fear, safety and hazardous and large loads. The Applicant also notes that the assessment adopts a reasonable worst-case scenario, where in practice construction activities will be staggered across the programme and all sites will not be active simultaneously. The Applicant has continued to engage with NCC throughout the development of the Scheme and the transport strategy has evolved in response to consultation feedback.

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			The Applicant therefore considers that the assessment provides a robust basis for concluding that, with the proposed mitigation measures, the transport and access effects of the Scheme would not be significant.
BEPS-332	Transport and Access	Conclusion Taken together, the CTMP, OTMP, PRoW and Permissive Paths Management Plan, and the Access and Public Rights of Way Plan do not demonstrate a safe, fixed and fully assessed transport and access solution. They reveal a scheme that depends on extensive access engineering, numerous crossings, widespread temporary closures, managed conflict on paths, road-based diversions, provisional abnormal-load works, and significant post-consent refinement. The application therefore materially understates the severity and breadth of transport and access impacts, over-relies on later management documents, and fails to show that this dispersed industrial development can be delivered on the local network without significant and inadequately resolved harm to roads, rights of way, promoted walking routes and public safety. It also fails to assess, in any fixed and examination-ready way, the full life-cycle transport consequences of the scheme, including the later	The Applicant notes this comment and refers to its response to BEPS-307 to 331.

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		repowering and replacement phase that the Applicant's own operational traffic document now confirms. Taken together, the CTMP, the PRow and Permissive Paths Management Plan, and the Access and Public Rights of Way Plan do not demonstrate a safe, fixed and fully assessed transport/access solution. They reveal a scheme that depends on extensive access engineering, numerous crossings, widespread temporary closures, managed conflict on paths, road-based diversions, provisional abnormal-load works, and significant post-consent refinement. The application therefore materially understates the severity and breadth of transport and access impacts, over-relies on later management documents, and fails to show that this dispersed industrial development can be delivered on the local network without significant and inadequately resolved harm to roads, rights of way, promoted walking routes and public safety.	
BEPS-333	Transport and Access	The Examining Authority and Secretary of State are requested to require, at minimum, the following. The Applicant should be required to: provide a fully revised and internally consistent Transport and Access case, using an up-to-date post-bypass baseline and mapping throughout, and correcting any inconsistent or outdated figures.	The Applicant considers that sufficient information has been provided to demonstrate a safe and deliverable transport and access strategy. Traffic survey data used within the assessment is robust and representative of local network conditions. The Applicant is aware of the opening of the Long Stratton

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		- remove from the scheme any reliance on routes or strategies that Norfolk County Council has expressly rejected, including Hall Lane for construction traffic, unless and until Norfolk expressly confirms otherwise on the basis of full technical detail. - demonstrate a final access strategy based on roads of appropriate standard and internal haul routes, with no reliance on unsuitable minor lanes unless fully justified, assessed and agreed with the highway authority. - provide a final, route-by-route closure and restriction schedule for all roads and PRoWs, identifying location, duration, sequencing, diversion consequences, emergency-access arrangements, school access implications and cumulative locality effects. - provide a revised PRoW assessment and mitigation package that properly addresses Boudicca Way, Via Beata, medium-term closures, road-based diversions and impacts on promoted trails and countryside access. - provide a detailed and fixed construction worker travel plan, with evidenced workforce origins, parking, pick-up points, minibus routing and enforceable modal assumptions, rather than leaving this to later contractor appointment. - provide a final abnormal-load strategy showing that all AILs can be accommodated on roads of appropriate standard and internal haul routes without unacceptable	Bypass and has engaged with Norfolk County Council (NCC) throughout the development of the access strategy. The Applicant continues to work collaboratively with NCC on transport matters. Where access via the Local Road Network is required, appropriate management and mitigation measures are proposed through the Outline CTMP [APP-201] with a detailed CTMP to be secured through a DCO Requirement. Impacts on PRoW have been assessed within the Outline PRoWPPMP [APP-203], including consideration of Boudicca Way, Via Beata, and routes subject to medium-term closures. A detailed PRoW and Permissive Paths Management Plan will be secured by DCO Requirement and will include further management and mitigation measures as appropriate. A Framework Construction Worker Travel Plan is included within the Outline CTMP [APP-201]. At this

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		harm to sensitive local roads, conservation areas, historic environments, trees, verges or street furniture. • assess fully the replacement / repowering traffic phase, including its road, PRow and amenity effects, rather than treating it as a lesser issue simply because construction is worse. If these matters cannot be resolved on the evidence before the close of examination, the application should be refused on the basis that the Applicant has failed to demonstrate a safe, acceptable, coherent and deliverable transport and access solution for the scheme over its full life cycle.	stage, contractor-specific workforce origins are not known and therefore detailed routeing information cannot yet be provided. A final Construction Worker Travel Plan will be incorporated into the detailed CTMP to be secured through the DCO. The transport implications of Abnormal Indivisible Loads (AIL) are assessed within the AIL report shown in Appendix D of the ES Volume 3, Appendix 11.3 - Transport Assessment [APP-174 to 177]. All AIL movements will be managed by specialist haulage contractors, and potential management measures are identified in ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]. Panel replacement traffic has also been considered. Section 5 of the ES Volume 3, Appendix 11.3 - Transport Assessment [APP-174 to 177] presents replacement trip generation, while the Outline OTMP [APP-202] provides further information on

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			replacement activities and associated mitigation. While the exact replacement programme is not defined, the assessment demonstrates that traffic effects during construction represent the worst-case scenario and therefore no greater effects are anticipated during construction. The Applicant therefore considers that the transport and access strategy has been appropriately assessed and that suitable mechanisms are proposed to secure the necessary detailed measures through the DCO process.
BEPS-334	Aviation	BEPS objects to the Proposed Development on the grounds that it gives rise to serious and inadequately assessed aviation safety impacts, particularly in relation to Tibenham Airfield and Seething Aerodrome. Those impacts are not addressed in a coherent or lawful way in the Environmental Statement. Instead, the issue is fragmented across a glint and glare appendix, a lighting strategy, a 'high-level' Tibenham report, and a separate Seething forced-landing report, with no single integrated assessment of aviation as a safety receptor. That approach is not sufficient for a development of this scale. The Scheme includes large areas of solar arrays,	The Applicant has assessed impacts specifically for Norfolk Gliding Club at ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029] turbulence and thermal effects and emergency landing constraints High Level Investigative Report [APP-222]. The assessments have been undertaken in accordance with the relevant guidance and policy, industry best practices, and

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		bifacial panels, tracker panels up to 4.5m high, a BESS, multiple substations, a new National Grid substation, operational lighting, security lighting, construction lighting and associated grid infrastructure including pylons up to 61m. All of those features are capable of affecting aviation safety, pilot workload, emergency options and aerodrome utility, yet they are not assessed as a single cumulative aviation problem. (Correspondence from GAAC, BGA and Tibenham Airfield referenced in this section will be provided in the full written representations)	assessment methodology for previously consented NSIP and DCOs. The Applicants Position on Aviation [EN0110014/EXAM/8.4] submitted at Procedural Deadline A outlines the engagement undertaken to date with Norfolk Gliding Club who operate out of Tibenham Airfield. The Applicant is also engaged in the SoCG with Norfolk Gliding Club and the GAAC.
BEPS-335	Aviation	Tibenham Airfield is a highly sensitive and nationally significant aviation receptor Tibenham is not a casual strip or low-value receptor. The Applicant's own Tibenham report describes it as an unlicensed aerodrome used by Norfolk Gliding Club (NGC) and powered light aircraft, with three runways and adjacent grass strips also used. The closest panels in Sites 1A and 1B are said to lie only 1.59km from the nearest runway threshold. The British Gliding Association (BGA) confirms that Tibenham is the long-established home of Norfolk Gliding Club, is an important site for training and cross-country flying, and is recognised as a national Significant Area for Sport / SASP, including because it hosts national	The Applicant considers that Tibenham Airfield is not a nationally significant receptor, as an unlicensed aerodrome does not accommodate for national aviation infrastructure. The Applicant acknowledges that Tibenham Airfield have previously hosted competitions on a 'national' scale, but does not relate to the significance of Highly Sensitive as defined in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. The Applicant refers to its response to [RR-1452] at NGC-001 to NGC-016 in the Applicant's Response to

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		competitions and provides one of the only relevant sites in the region. The BGA also explains that reductions in launch rate and flying activity directly threaten club sustainability and viability. Norfolk Gliding Club's own responses make clear that the area to the east of the airfield, including the area between the railway and the A140, is used for actual circuits and aviation activity because of the proximity of Priory Farm Airstrip and Tibenham village to the west. NGC states that a proportion of circuits are therefore flown to the east at heights in the range of 300ft to 800ft, and that glider circuits cannot be reduced to rigid or simplistic standardised patterns because gliders cannot go around and must constantly adapt to wind, lift, sink, traffic and obstacle constraints.	Relevant Representations Part 2: Statutory Bodies, Undertakers and Notable Parties with whom the Applicant is seeking a Statement of Common Ground [EN0110014/EXAM/8.7].
BEPS-336	Aviation	Policy and safeguarding context The BGA material confirms that Tibenham is an aerodrome for planning and aviation purposes, notwithstanding its unlicensed status, and points to CAP793, the ANO definition of an aerodrome, and national policy support for general aviation airfields, including unlicensed aerodromes. The BGA also records that Tibenham's SASP designation carries weight because of its significance and scarcity as a gliding venue. NGC and BGA both point to the 'agent of change' principle and to EN-1's requirement that new energy infrastructure must not adversely affect UK aerodromes, aircraft and	The Applicant has considered impacts upon Tibenham Airfield considering the relevant policy, guidance and legislation outlined in the ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. The Applicant has engaged with Tibenham Airfield and assessed specific circuits and approaches pertaining to the engine-powered and gliding activity. The Scheme is judged to not cause a significant adverse scenario, due to reflecting panels being behind a pilot

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		airspace. NGC's objection also expressly relies on CAP 738 safeguarding principles and the need to protect gliding and powered aircraft operations from adverse nearby development. GAAC's July 2025 letter is important because it raises a procedural objection at PEIR stage, stating that the EIA scope had still not been properly revised to address critical aviation safety issues and warning that non-compliance with section 55 and Schedule 4 of the EIA Regulations could found a procedural objection.	travelling in the direction of a circuit, or views of reflecting panels coinciding with the sun, outlined in ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029]. The Scheme was not judged to significantly reduce the available space for EFATO and GLF, based on best practice and no significant effects on thermal updrafts, turbulence or wind shear was predicted as outlined in the High Level Investigative Report [APP-222].
BEPS-337	Aviation	Failure to treat aviation as a coherent safety receptor The aviation effects are split across multiple documents. Glint and glare is dealt with in the glint and glare appendix. Artificial lighting is dealt with in the Lighting Strategy. Tibenham is dealt with in a separate 'High-Level Investigative Report'. Seething is dealt with in another report on forced landing options. The result is that aviation is technically acknowledged but not environmentally assessed in a coherent way. The Lighting Strategy expressly identifies Tibenham Airfield within 5km and recognises that pilots are susceptible to glare from construction and operational lighting. It also records the site as lying within a low ambient light rural E2	The Applicant has assessed impacts upon Tibenham Airfield via the ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029], glint and glare addendum specific to Tibenham Airfield, and additional aviation concerns (High Level Investigative Report [APP-222]). The assessments have been undertaken in accordance with the relevant guidance, industry best practices and assessment methodology for previously accepted NSIP and DCOs.

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		lighting zone. However, the detailed lighting design is deferred to the detailed design stage. Chapter 4 of the ES confirms that although lighting is not required within the solar arrays themselves, lighting will be provided at the Project Substations, National Grid Substation and BESS, including motion-sensing lighting, and temporary lighting will also be needed during construction and decommissioning. The Scheme is therefore not, in substance, an unlit rural development. It is a major industrial energy scheme with multiple lighting sources in a dark rural environment, but there is no integrated aviation lighting assessment.	Whilst the Scheme will introduce new lighting into areas that are currently unlit, the lighting will remain switched off under normal operating conditions and will only be activated during infrequent maintenance activities, emergency situations, or security-related events. Construction & Operational lighting will be designed, installed and operated in accordance with the best practice principles established in the Lighting Strategy, incorporating measures such as zero upward light, shielding and directional aiming of luminaires away from Site boundaries to minimise obtrusive light. Given the limited use of the proposed lighting, and the measures outlines above, the effect on all receptors is anticipated to be negligible.
BEPS-338	Aviation	Glint and glare assessment is unreliable and operator evidence has been ignored NGC's July 2025 objection to the glint and glare work is detailed and serious. It says the glint and glare report is based on errors, inaccuracies and omissions, that Pager	The Applicant had engaged with Norfolk Gliding Club to establish receptors, including technical details, to inform the ES Volume 3, Appendix 18.1 – Glint and Glare Assessment

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		Power did not have a proper aviation understanding, and that the report continued to rely on simplistic power-only circuit modelling despite NGC having explained the complexities of mixed glider and powered aircraft operations and shown actual circuits at an in-person meeting. NGC says the glint and glare analysis addresses only one of four principal aviation risk categories, namely glint and glare itself, while failing properly to assess thermal updrafts, EFATO / aborted aerotow, and bird strike. NGC also says the primary field-of-view approach is unrealistic for glider operations because pilots use a scan cycle and must constantly look outside and inside the cockpit while landing. NGC specifically objects that glint and glare can create temporary visual disturbances and after-image effects during the most critical phases of flight. NGC further records that the CAA has rejected similar Pager Power reasoning elsewhere, including on the basis that glare outside a supposed primary field of view cannot be discounted and that solar development can amount to a significant change in the operating environment capable of causing visual disturbance to pilots, including students, during critical and dynamic phases of flight. The BGA independently supports the need for rigorous investigation of Sites 1 and 2 in relation to glint and glare,	[AS-025] to [AS-029]. The requests are documented via email chain. Norfolk Gliding Club were able to confirm the receptors once they had understood what was being asked of them. The subsequent assessment of receptors as confirmed by Norfolk Gliding Club are presented in ES Volume 3, Appendix 18.1 Glint and Glare Assessment [APP-189 to APP-193]. These receptors were also confirmed correct by Norfolk Gliding Club for a neighbouring solar development. The Applicant has assessed additional aviation concerns including thermal updrafts, EFATO / aborted aerotow in a separate technical assessment High Level Investigative Report [APP-222].

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		engine or launch failures, and associated operational effects. The BGA says the proposed locations east of Tibenham could impact the club's ability to operate safely and could threaten launching in certain weather conditions, training, competition hosting and Tibenham's SASP status.	
BEPS-339	Aviation	Tibenham report: high-level, assumption-led, and not precautionary The Tibenham report is expressly titled a "High-Level Investigative Report". Its purpose is to investigate EFATO and glider launch failure, thermal updrafts and turbulence / wind shear in relation to Norfolk Gliding Club at Tibenham. Pager Power told the Safeguarding Officer at Tibenham that this report had actually been based on work done at an engine-powered airfield in Yorkshire the previous year. The report admits there is no known UK or international guidance specifically for EFATO / glider launch failure effects of solar developments on aviation operations, and no known guidance on turbulence effects of solar developments on aviation operations. It therefore relies on proxy material, professional judgement and analogy, including wind turbine guidance. That is a major weakness. Where methodology is uncertain, the need is for greater caution and fuller investigation, not for a high-level screening conclusion.	The Applicant had informed Norfolk Gliding Club that their concerns had been similarly raised by other aerodromes and referenced the Yorkshire airfield as an example to reiterate and demonstrate that their concerns can be addressed. The subsequent assessment High Level Investigative Report [APP-222] is specific to Norfolk Gliding Club, and refers to applicable guidance, conservative assumptions and industry best practices. The Applicant notes that there is no recognised or established detailed model 'meteorological modelling' to assess thermals.

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		The report concludes that the proposed development would reduce available landing space by approximately 6.46% within a 60-degree sector out to 2,000m from threshold 26 and therefore would not significantly reduce EFATO / GLF space. But that conclusion depends on a simplified percentage-occupation approach rather than a realistic safety assessment of emergency decision-making under stress, actual safe landing corridors, obstacle placement, non-ideal glide performance or cumulative encroachment. The same report dismisses thermal updraft effects as insignificant on the basis that such thermals are weak and there is vertical separation from circuits, and dismisses turbulence and wind shear by applying a 20-times-height buffer and concluding that pilots are far enough above the arrays. Yet these conclusions are not based on field measurement or detailed local meteorological modelling. They are again assumption-led. NGC strongly disputes the adequacy of that approach and says thermal updrafts are an unnecessary additional risk in the late stages of glider circuits.	
BEPS-340	Aviation	EFATO, glider launch failure and aborted aerotow risks at Tibenham NGC's evidence on launch failure is detailed and highly relevant. It points out that engine failure after take-off is not the only relevant event. In gliding terms, aborted aerotow events may arise from tug issues, glider issues, tow rope	The Applicant has considered EFATO and Glider Launch Failure in accordance with the applicable guidance and industry best practices in the High Level Investigative Report [APP-222]. The Applicant notes that further information regarding

ID	Theme	Representation	Applicant's Response
		issues, bird strike, crosswind and turbulence effects, speed and weight issues, and meteorological factors. NGC says that in such circumstances both aircraft may need to land immediately and that straight-ahead landing into a poor field is often safer than trying to manoeuvre around obstacles. NGC also relies on AAIB data showing that many take-off engine-failure incidents occur at or below 300ft, and says that any low-level engine failure using runway 08 could result in a forced landing among the proposed solar panels. The BGA likewise notes that an Australian study found partial power loss after take-off to be more likely than complete engine failure in light single-engine aircraft and says the proposed array about 1.5km from runway 08 would seriously increase risk for pilots experiencing full, partial or complete power failure or launch failure. NGC also records that the CAA advised a safeguarding approach using concentric circles and that the 5km circle specifically covers the area east of the airfield beyond the A140, including concern about glint and glare and building-induced turbulence. NGC's safeguarding plan and map show East Pye, Tasway, Long Stratton BESS and the proposed Norwich to Tilbury electricity transmission line all within the wider safeguarded operational context of Tibenham.	thresholds to determine the impact was not provided by Tibenham Airfield.
BEPS-341	Aviation	Bird strike is not assessed as part of the aviation case	It is considered likely that the Scheme will result in increased opportunity for

ID	Theme	Representation	Applicant's Response
		NGC says bird strike is one of the four main aviation safety risks created by a solar installation of this size close to an active airfield and refers to concerns that solar panels may attract birds through a 'lake effect'. NGC explains that a bird strike can cause anything from severe cockpit contamination to engine failure, and that in a light aircraft the time available to respond may be extremely short. NGC says the applicant has not addressed this issue as part of a full aviation risk assessment. That point is important not only on its own merits but because it demonstrates again that the Applicant has not treated aviation as a combined safety case. Risks are not merely separate; they interact.	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 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.
BEPS-342	Aviation	Seething report: express admission of aviation constraint and reactive redesign The Seething Aerodrome report is especially revealing because it expressly accepts that the earlier design constrained forced landing options. It states that Site 10 lies under the climb-out from runway 24 at Seething and that the eastern section of Site 10 occupies land extending	The potential for the Scheme to affect forced landing options for aircraft using Seething airfield has been assessed in Potential Impact on Seething Aerodrome Force Landing Options [APP-223]. Following the conclusions of this report the layout was changed in order to provide additional safe landing

ID	Theme	Representation	Applicant's Response
		along the extended centreline from about 500m to 2,100m from the runway end. The report then concludes that aircraft suffering an EFATO on departure from runway 24 at heights between 100 and 300 feet would be likely to have their forced landing options constrained by the solar farm. It also concludes that, on approach to runway 06, aircraft between 542 and 200 feet may have their forced landing options constrained. The Applicant's answer was to accept recommendations to amend the solar PV array boundary in the relevant part of Site 10B. The final report then says that with these amendments the Scheme would no longer constrain forced landing options. This matters for two reasons. First, it shows the aviation issue is real and material, not hypothetical. Second, it shows that the Applicant's approach is reactive and iterative: aviation harm is admitted, then the layout is modified to try to design around it. That does not remove the need for a robust and integrated aviation safety assessment, especially when the calculations themselves still rely on simplified assumptions such as a 600m airborne point, 500ft/min climb, 60-knot ground speed, 8:1 glide ratio and fixed +/-45° sectors.	areas for aircraft operating to/from Seething airfield.
BEPS-343	Aviation	Operator evidence is entitled to substantial weight NGC states that the close proximity of the proposed solar farm poses an unacceptable safety risk to its operations	The Scheme was not judged to significantly reduce the available space for EFATO and GLF, based on best

ID	Theme	Representation	Applicant's Response
		and relies on CAA and safeguarding principles to say that the aerodrome operator is the body best placed to determine what is and is not safe for that aerodrome. The BGA supports NGC and says any further plans should rigorously investigate Sites 1 and 2 in respect of glint and glare and engine or launch failures. It also says loss of one launch direction would mean loss of competition utility, because BGA rated competitions rely on aerotow and competitors will not sign up if good weather days are likely to be lost because launch direction cannot safely be used. GAAC's letter adds that it is not enough to rely on the Scoping Opinion caveats or to proceed on a flawed PEIR / ES if critical aviation effects remain inadequately scoped or assessed.	practice; and no significant impact effect on thermal updrafts, turbulence or wind shear was predicted as outlined in the High Level Investigative Report [APP-222] The Applicant will continue to engage with NGC to discuss potential launch failure issues and potential mitigations.
BEPS-344	Aviation	Cumulative effects: no lawful cumulative aviation assessment The cumulative schemes appendix confirms a dense cluster of energy and transport infrastructure in South Norfolk and includes Norwich to Tilbury, EcoPower Suffolk, High Grove Solar, The Drovers, Hornsea Project Three, Sheringham and Dudgeon extensions, local BESS schemes and other developments. The cumulative developments map visually confirms that concentration. Yet the cumulative schemes methodology lists 'Glint and Glare' as scoped out of cumulative assessment. There is therefore no cumulative aviation assessment of combined	The Applicant considers assessment of a combined 'obstacle environment' as not significant for a Scheme proposing solar panels no more than 4.5m above ground. Cumulative glint and glare impacts had been considered by the Applicant, and ruled out due to the different configurations of solar panels for the developments considered. As a result, solar reflections from the Scheme do not coincide with other developments.

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		glare, combined lighting, combined obstacle environment, or progressive reduction of emergency landing and manoeuvring space around nearby aerodromes. That omission is especially serious because the Norwich to Tilbury pylons proposal itself (running directly to the west of Tibenham Airfield) has generated operator and BGA concern regarding take-offs, approaches, aerotow, emergency landing space and competition requirements, and that the operator has not agreed the acceptability of that project. East Pye is therefore not being proposed in an unconstrained aviation environment. It is being proposed in an already pressured and disputed cumulative airspace and obstacle environment. NGC has also pointed out that if the Norwich to Tilbury pylon route proceeds, more traffic may route down the east side of Tibenham, increasing congestion exactly where East Pye Sites 1 and 2 sit. That interaction has not been assessed by the Applicant.	
BEPS-345	Aviation	Scheme lighting, glint and cumulative obstacle environment are not assessed together The Scheme's aviation impacts do not arise from one mechanism only. They arise from a combination of reflective surfaces, panel tilt and tracking, emergency landing constraint, artificial lighting, substations, possible turbulence / thermals, increased pilot workload, training	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]). The Applicant considers that the ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-

ID	Theme	Representation	Applicant's Response
		effects, competition effects and possible cumulative obstacle and routeing effects with other infrastructure. The ES does not assess that combination. The cumulative schemes appendix does not assess glint and glare cumulatively. The lighting strategy identifies aviation receptor sensitivity but does not provide an integrated aviation safety conclusion. The Tibenham and Seething reports deal only with selected physical or emergency scenarios. This fragmentation prevents a lawful assessment of the likely significant effects of the development on aviation safety as a whole.	029] provides a comprehensive and proportionate assessment of the aviation-related effects of the Scheme. In accordance with CAP 738, the introduction of new obstacles, such as the Scheme, should be considered in the event of emergency scenarios and as part of recommended good practices (i.e. pre-flight planning). However, the safeguarding of any aerodrome is not based on elimination of all potential risks and hazards. General Aviation (GA) aerodromes, such as Tibenham Airfield, regularly operate in environments where traffic, obstacles in the form of vegetation and buildings, and sometimes restricted airspace exist within the vicinity of the extended runway centreline.
BEPS-346	Aviation	Consequences for Tibenham's utility, training, competition role and viability The BGA says anything which reduces launch rate or makes launch direction unusable threatens the club's survival. It explains that Tibenham is important for basic training, cross-country flying and national competitions, and that not being able to aerotow in one direction would	The Scheme was not judged to significantly reduce the available space for EFATO and GLF, based on best practice and no significant impact effect on thermal updrafts, turbulence or wind shear was predicted as outlined in the High Level

ID	Theme	Representation	Applicant's Response
		undermine both ordinary club activity and competition utility. It also says actual and perceived increases in difficulty can cause loss of utility, reduced flying activity, reduced member retention and recruitment, and long-term economic decline. Those are not abstract or ancillary concerns. They are direct planning effects on an existing community and sporting facility of acknowledged national significance. They also fit squarely within the “agent of change” principle relied on by NGC and BGA.	Investigative Report [APP-222] The Applicant will continue to engage with NGC to discuss potential launch failure issues and potential mitigations.
BEPS-347	Aviation	Summary of the objection The aviation evidence before the Examining Authority already shows the following: • Tibenham is an active, nationally significant gliding and aviation site, with real mixed-use operational complexity, not a simple or low-sensitivity receptor. • the operator, BGA and GAAC have all raised sustained objections or concerns. • the Applicant's glint and glare and aviation analysis has been criticised by those who actually understand and operate the site. • the Tibenham report is high-level and assumption-based in a context where no accepted methodology exists and caution is required.	The Applicant refers to its response to BEPS-334 to 348.

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		- the Seething report expressly admits the earlier Scheme constrained forced landing options in critical flight envelopes. - bird strike and combined risk pathways are not properly assessed. - the Scheme introduces lighting and other industrial infrastructure into a dark rural environment without an integrated aviation lighting assessment. - there is no lawful cumulative aviation assessment despite multiple nearby solar, BESS and transmission projects, including Norwich to Tilbury. For all of those reasons, the ES is presently inadequate to support a conclusion of no likely significant effect on aviation safety or airfield utility.	
BEPS-348	Aviation	Remedies sought BEPS therefore asks the Examining Authority to treat aviation safety, airfield safeguarding and cumulative aviation effects as principal issues for examination. BEPS seeks: a full and integrated aviation assessment covering glint and glare, artificial lighting, EFATO, glider launch failure / aborted aerotow, thermal and turbulence effects, bird strike and pilot workload; proper cumulative assessment with Norwich to Tilbury and other relevant solar / BESS schemes; full disclosure and testing of actual circuit and safeguarding data supplied by Norfolk Gliding Club and other operators; direct engagement with	The Applicant has used and assessed, including geometric modelling for, specific receptors as outlined by Norfolk Gliding Club for the ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-025] to [AS-029] and additional concerns such as EFATO, glider launch failure / aborted aerotow, thermal and turbulence effects [APP-222]. The Applicant considers the conclusions of these assessments in accordance with

ID	Theme	Representation	Applicant's Response
		Tibenham, Seething, BGA, GAAC and other affected aviation interests; and, unless and until the Applicant can demonstrate through robust evidence that operations, emergency options, training, competitions and aerodrome utility will not be adversely affected, refusal of development consent or removal / redesign of the affected solar areas, especially Sites 1 and 2 and any other land falling within critical safeguarded or emergency-use areas.	relevant guidance and industry best practice as robust. The Applicants Position on Aviation [EN0110014/EXAM/8.4] submitted at Procedural Deadline A outlines the engagement undertaken to date with Norfolk Gliding Club who operate out of Tibenham Airfield. The Applicant is also engaged in agreeing an SoCG with Norfolk Gliding Club and the GAAC.
BEPS-349	Noise and Vibration	Chapter 12 - Noise and Vibration Overview BEPS objects to the Scheme because the applicant has not demonstrated that likely noise and vibration effects would be acceptable for nearby residents, sensitive community receptors, public rights of way users, equestrians, or sensitive ecological receptors. The applicant's conclusion that no significant residual effects would arise depends heavily on modelling assumptions, embedded controls and later 'additional mitigation', rather than on a clear demonstration that the Scheme, as proposed, is inherently acceptable. Chapter 12 reaches that conclusion, and the Statutory Nuisance Statement adopts the same position.	The sound environment has been considered at each receptor within the assessment presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048], with measurements undertaken at representative locations. The measurements conducted at each location have been analysed, and typical background sound levels have been derived for each noise residential receptor. Receptor-specific scrutiny has therefore been applied, based on the methodology provided within BS 4142.

ID	Theme	Representation	Applicant's Response
		This is not a compact site affecting one village edge or one consistent acoustic environment. Figure 12.1 shows sound survey locations spread across the full extent of the Scheme, and Figure 12.2 shows a large number of noise-sensitive receptors distributed across the southwest hub, central corridor, Hempnall/Fritton area, and the quieter eastern and northeastern parcels near Brooke, Woodton and Saxlingham. The applicant's own evidence therefore confirms that this is a dispersed, landscape-scale noise case requiring careful, receptor-specific scrutiny.	The following commitments are included in the Outline OEMP [APP-197]: - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on PROWs will not exceed 55 dBA. The commitments demonstrate that significant adverse effects will be avoided and that adverse effects will be mitigated and minimised.
BEPS-350	Noise and Vibration	The assessment is too dependent on assumed mitigation Appendix 12.2 confirms that the operational assessment depends on a series of assumptions and controls, including example manufacturer data, assumed plant orientation, assumed acoustic fencing around selected BESS areas, reduced fan speed duty at night and in the early morning, and further 'additional mitigation' to reduce inverter sound	The following commitments are included in the Outline OEMP [APP-197]: Noise from the BESS will achieve the predicted sound levels in ES

ID	Theme	Representation	Applicant's Response
		levels in the early morning period. The applicant is therefore not showing that the Scheme is acceptable as presently fixed; it is showing that, if plant behaves as assumed and if further mitigation is successfully delivered, a compliant result may be achievable. That matters because the modelling appendix also confirms that, before additional mitigation is applied, a number of receptors experience early-morning operational noise above background by +5 to +8 dB, with moderate adverse effects at several locations including NSR14, NSR43, NSR47, NSR48, NSR59, NSR60 and NSR62. The applicant then removes those outcomes only by assuming additional mitigation to the inverter regime. A conclusion of acceptability that depends on later mitigation assumptions is materially weaker than a conclusion based on a fixed and demonstrably quiet design.	Volume 1, Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on PRoWs will not exceed 55 dBA. The commitments demonstrate that significant adverse effects will be avoided and that adverse effects will be mitigated and minimised.
BEPS-351	Noise and Vibration	The baseline confirms a very quiet rural sound environment The baseline sound survey shows that many parts of the Scheme lie in genuinely quiet rural environments, particularly at night and in the early morning. The survey covered 51 measurement locations over 6 to 8 day periods between November 2024 and February 2025. Table 22 then identifies typical background sound levels at each monitoring position and shows that, in several parcel groups, night-time and early-morning LA90 levels fall into the high teens and low 20s dB, including at receptors	The assessment presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] considers the variability of background sound levels around the Scheme by following the relevant assessment methodologies. The assessment methodologies rely on the use of background and ambient sound levels at receptors.

ID	Theme	Representation	Applicant's Response
		corresponding to parcel groups 7 and 8 and elsewhere in the quieter central and eastern parts of the Scheme. The baseline report also records that sound climates vary markedly across the Order Limits. Some locations are traffic-influenced, but others were dominated at survey times by foliage movement, birdsong, private amenity use, livestock, aircraft and intermittent shooting. That variation matters. In very low-background rural conditions, even moderate plant noise, fan noise, transformer hum, inverter noise, HDD activity, piling or construction traffic may be intrusive. The applicant's broad summary conclusions therefore risk understating real effects in the quietest parts of the receiving environment.	The following commitments are included in the Outline OEMP [APP-197]: - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on PROWs will not exceed 55 dBA. The commitments demonstrate that significant adverse effects will be avoided and that adverse effects will be mitigated and minimised.
BEPS-352	Noise and Vibration	The receptor pattern requires a more local and granular assessment Figure 12.2 is important because it shows the spread and number of noise-sensitive receptors across the whole Scheme. Receptors are not confined to one cluster; they are distributed around multiple site parcels and route sections, including locations that are evidently close to	The assessment presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] is based on guidance provided within BS 4142:2014+A1:2019. The NOAEL, LOAEL and SOAEL thresholds applied within the assessment are based on

ID	Theme	Representation	Applicant's Response
		infrastructure areas, cable route sections and rural lanes. Read together with Figure 12.1, which maps the sound survey locations, the figures demonstrate that the applicant is dealing with multiple distinct receptor clusters in multiple distinct acoustic settings. That has two consequences. First, conclusions expressed in global terms are inherently less reliable where effects will be highly localised. Second, it increases the importance of testing whether particular receptors, including those in the quietest areas, have been assessed conservatively and with sufficient regard to real receptor use, including outdoor amenity and sensitive activities.	the guidance set out within BS 5228-1 and BS 4142, and take account of varying ambient and background sound levels across the Scheme. The assessment has been undertaken at each individual receptor, with the results presented in ES Volume 3, Noise Modelling and Calculations [APP-179].
BEPS-353	Noise and Vibration	The BS 4142 operational case is open to challenge The operational assessment uses BS 4142 methodology, but Appendix 12.2 confirms that the applicant has applied a 0 dB correction for tonality, impulsivity, intermittency and other sound characteristics. The reason given is that BESS and related equipment are said to produce broadband sound without identifiable tones, and that any tonal characteristics can be mitigated later at detailed design stage. That is not fully convincing. The appendix accepts that transformers can generate a 100 Hz hum due to vibration of the transformer coil, but then assumes that this will not be distinguishable at the receptor because it will be masked by other broadband sound. In low-background rural conditions, and particularly in the early morning, that	The acoustic feature corrections, along with justifications, are provided in Table 3.16 ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179]. In terms of impulsivity, the proposed equipment runs continuously without producing sudden, noticeable sounds. Acoustic feature corrections for impulsivity are therefore not applied. In terms of intermittency, during the battery charging and discharging process, inverters, transformers and battery cooling systems operate continuously, surpassing the BS 4142

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		assumption deserves closer scrutiny. A zero-penalty approach may be overly applicant-friendly where plant character, tonal content, audibility and low-frequency perception are all live issues. The applicant also relies on a worst-case but still modelled representation of plant operation, including solar inverter operation between 04:00 and 23:00 and a continuously operating BESS scenario, while also relying on later controls such as reduced fan speeds and acoustic fencing. That again shows the extent to which compliance is being achieved on paper by controlled assumptions rather than by a fixed, fully evidenced final design.	reference time interval (1 hour during the day and 15 minutes at night). As the system cools down, the cooling units shut off gradually and at different times, without any distinct on/off patterns. Therefore, no rating penalty has been applied for intermittency. In terms of tonality, Table 3.16 of ES Volume 3, Appendix 12.2 – Noise Modelling and Calculations [APP-179] advises that energy storage systems typically produce broadband sound without identifiable tones. While high voltage transformers can generate a 100 Hz hum (and associated harmonics) due to vibration of the transformer coil, the modelling outcome demonstrates that this is unlikely to be distinguishable at receptors, and it would be masked by other broadband sound relating to the BESS. It should be recognised that the assessment has been undertaken on example noise data, not the finalised plant selection, as the detailed design has not yet been finalised. As per the

ID	Theme	Representation	Applicant's Response
			Outline OEMP [APP-197] an assessment will be undertaken to ensure compliance with the levels presented in the ES.
BEPS-354	Noise and Vibration	The applicant's own modelling produces adverse operational outcomes before additional mitigation The applicant's own early-morning operational assessment shows adverse outcomes before additional mitigation is applied. Table 3.18 in Appendix 12.2 records minor adverse and moderate adverse effects at a range of receptors where calculated rating levels exceed background sound levels by up to +8 dB. These include NSR14 at +6 dB, NSR43 at +8 dB, NSR47 at +8 dB, NSR48 at +7 dB, NSR59 at +7 dB, NSR60 at +7 dB and NSR62 at +6 dB. The applicant's response is not to accept those as residual effects but to rely on 'additional mitigation' in Table 3.20, largely through quieter inverter operation, to reduce those outcomes to negligible. This is a central weakness in the assessment. It shows that the unmitigated or not-yet-secured operational design does not itself demonstrate acceptability at a number of receptors during the most acoustically sensitive part of the day.	The following commitments are included in the Outline OEMP [APP-197]: - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements will not exceed the background sound level at other residential receptors. - Specific sound levels on PRowS will not exceed 55 dBA. The commitments demonstrate that significant adverse effects will be avoided and that adverse effects will be mitigated and minimised.

ID	Theme	Representation	Applicant's Response
			The Applicant's approach is fully consistent with the EIA methodology set out in ES Volume 1, Chapter 2 – EIA Methodology [APP-038]. The methodology requires the assessment to identify likely significant effects, consider any additional mitigation necessary to reduce or mitigate those effects, and then determine the resulting residual effects. Additional mitigation is specifically anticipated where significant effects are identified, and the residual effects presented in the ES represent the anticipated effects of the Scheme following implementation of those mitigation measures. Accordingly, the presentation of pre-mitigation effects and mitigated residual effects is a standard part of the EIA process.
BEPS-355	Noise and Vibration	South Norfolk Council directly disputes the operational thresholds and acceptability case South Norfolk Council's Environmental Management Officer raised strong and specific concerns in relation to Chapter 12. SNC stated that operational noise should be at background level or below, that 5 dB above background is considered LOAEL and is not acceptable, and that the BESS and substation details were insufficiently fixed to	The adopted LOAEL threshold is consistent with that referenced by The Interested Party, being 5 dB above the background sound level for operational noise. Noise policy (NPS EN-1,3 and 5) requires that:

ID	Theme	Representation	Applicant's Response
		support the conclusions being drawn. SNC also stated that mitigation should reduce sound to background levels and that the BESS and substations could pose a significant impediment to the development. Those comments align with the weaknesses visible in the applicant's own modelling. They go to the correctness of the applicant's chosen thresholds, the adequacy of mitigation, and whether the applicant has shown an acceptable operational environment for nearby receptors at all.	- Significant adverse effects are avoided (i.e. those which exceed the SOAEL); and - Adverse effects are mitigated and minimised (i.e. those which are above the LOAEL). In this case, the operational noise commitments within the Outline OEMP [APP-197] comply with this. It should also be noted that the Applicant is undertaking further consultation with the relevant Environmental Health Officers on this matter to resolve any outstanding queries.
BEPS-356	Noise and Vibration	Construction noise has been understated The construction case is more serious than the headline chapter suggests. Appendix 12.2 states that access road works would exceed the daytime SOAEL when within 30 m of high sensitivity receptors. It also identifies moderate adverse piling effects at NSR29 and moderate adverse daytime HDD effects at NSR45.	The Applicant acknowledges that the SOAEL is expected to be exceeded when internal access roads are within 30 m of high sensitivity receptors. To reduce impacts, mitigation will be incorporated, such as consideration of the location of internal access routes and localised temporary barriers during construction. The use of acoustic

ID	Theme	Representation	Applicant's Response
		The night-time HDD case is stronger still. Table 2.11 records multiple moderate and major adverse effects, including major adverse outcomes for dwellings north and south of Lundy Green, Market Lane Farm, Thetford Farm House, Dawsons Farm and dwellings on Wash Lane. Those are substantial impacts in ordinary planning terms, especially in quiet rural environments and especially at night. The applicant's attempt to neutralise them by reference to duration and later management measures does not remove the fact that the applicant's own modelling predicts major adverse night-time disturbance at a number of locations.	barriers to minimise noise impacts is noted in the Outline CEMP [APP-196]. The duration of effect is considered to be an important factor in determining whether construction noise effects are significant or not. The Applicant acknowledges that the SOAEL could be exceeded in the event of night-time HDD works at specific receptors. However, mitigation will be employed to mitigate noise effects as far as practicable. Table 3.7 within the Outline CEMP [APP-196] commits to seeking Section 61 consent from the relevant planning authority where works are anticipated to generate significant noise effects outside of standard working hours.
BEPS-357	Noise and Vibration	The treatment of duration and significance The applicant records that HDD works may produce very high temporary impacts, including night-time effects above SOAEL, but then seeks to reduce their importance by relying on the fact that the works are temporary and move around the site. That is not an adequate answer for the residents who are actually exposed, particularly where	The Applicant has determined that resultant construction noise levels from any night-time HDD works could be above the SOAEL. The assessment considers that the effects are not significant due to the duration of exposure. This is based on guidance provided within BS 5228-1:2009+A1:2014. The Applicant

ID	Theme	Representation	Applicant's Response
		exposure occurs overnight or in the early morning in very quiet locations. A short duration does not prevent an effect from being severe in its actual impact on sleep, peace and amenity. This is particularly so where the modelling appendix identifies major adverse outcomes at specific rural receptors during night-time HDD operations. The significance reasoning therefore appears to underweight the seriousness of short-duration but intense disturbance.	acknowledges that the SOAEL could be exceeded due to any night-time HDD works at specific receptors. However, mitigation will be employed to mitigate noise effects as far as practicable. Table 3.7 within the Outline CEMP [APP-196] commits to seeking Section 61 consent from the relevant planning authority where works are anticipated to generate significant noise effects outside of standard working hours
BEPS-358	Noise and Vibration	Quieter practicable construction methods have not been demonstrated The applicant has modelled percussive piling and other significant vibration-generating methods as part of the construction case. Appendix 12.2 confirms vibration calculations for percussive piling and identifies worst affected receptors including NSR29 at 45 m and NSR8 at 90 m. South Norfolk Council expressly objected to percussive piling and stated that quieter alternatives such as screw piles should be preferred. SNC also stated that percussive piles are not acceptable as a form of fixing. A robust assessment should start by selecting the quietest	As noted in paragraph 4.3.7 of ES Volume 1: Chapter 4 – The Scheme [APP-040], driven piles are the most common installation solution on existing UK solar farms. The construction noise assessment results presented in Table 12-18 of ES Volume 1 Chapter 12 – Noise and Vibration [APP-048] outlines that two noise sensitive receptors (NSR29, commercial facilities on Bungay Road) and NSR 8 (residential) are expected to experience temporary short-term effects. For medium/high sensitivity

ID	Theme	Representation	Applicant's Response
		practicable methods rather than by assuming noisier methods and then trying to mitigate the resulting effects through management measures.	receptors during piling works the effects are likely to be minor adverse and not significant. At other receptors, construction activity will likely cause short term, negligible effects, and are considered not significant.
BEPS-359	Noise and Vibration	Vibration effects are not convincingly resolved The vibration assessment adopts conservative assumptions and concludes that effects would be minor adverse or negligible. However, that conclusion is tied to the same issue as above: whether the applicant should be using percussive piling at all. If a quieter method is practicable, then vibration from a noisier method should not be treated as an acceptable baseline merely because the calculated PPV falls within a 'minor' category. Further, the assessment's conclusion that construction vibration is 'not significant' is weakened by the applicant's own acknowledgment that access roads and piling would need to occur within 45 metres for the SOAEL to be exceeded, and by the presence of identified receptors relatively close to parts of the works. A more precautionary approach would be justified.	As noted in paragraph 4.3.7 of ES Volume 1, Chapter 4 – The Scheme [APP-040], driven piles are the most common installation solution on existing UK solar farms. The construction vibration assessment results presented in Section 12.8 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] outlines that one noise sensitive receptor (NSR29, commercial facilities on Bungay Road) is approximately 45 m from potential piling works, which would result in vibration levels approaching but not exceeding the SOAEL. At other receptors, construction activity will likely cause short term, negligible

ID	Theme	Representation	Applicant's Response
			to minor adverse effects, and are considered not significant.
BEPS-360	Noise and Vibration	Sensitive receptors have not been treated with enough caution South Norfolk Council challenged the applicant's receptor sensitivity approach, including the treatment of the nursery receptors at Site 5. SNC stated that the nursery occupants should be treated as high sensitivity, not medium, and also required outdoor amenity space to be assessed, especially during evenings and weekends when residents are more likely to be outdoors and scheme-related equipment may still be operating. That criticism is significant because the applicant's significance outcomes depend in part on how receptors are classified and what forms of receptor use are recognised. If receptor sensitivity has been understated, or if outdoor amenity has not been sufficiently examined, the resulting conclusions are weakened.	The assessment presented within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] applies a high sensitivity to NSR30 (Jack in the Box Nursery). The assessment of operational noise considers sound levels experienced outside of noise sensitive properties. The assessment therefore considers a worst case based on receptor being outside at NSR30.
BEPS-361	Noise and Vibration	Rights of way users and equestrians are underassessed The British Horse Society stated that inverter housing should avoid sound transmission and be sited away from bridleways and byways, and that construction traffic should avoid passing along or across equestrian routes where possible. Those concerns are directly relevant in a rural area where bridleways, byways and green lanes are part of	The Interested Party is referring to the <i>Advice on Solar farms new routes used by equestrians</i> published by the British Horse Society in August 2025. The guidance states that <i>"Inverter buildings near rights of way should be constructed to minimise transfer of sound"</i>. No definition is

ID	Theme	Representation	Applicant's Response
		the daily access network and where user amenity depends on a sense of openness, quiet and safety. The applicant's Chapter 12 approach does not appear to give those users any equivalent prominence to residential receptors, even though the scheme's construction and operational sound environment may materially affect their experience and safety. That is a deficiency in the assessment.	given to how 'near' inverter buildings need to be for the advice to be relevant, or by how much noise should be minimised. The Applicant notes that it is not physically possible to avoid sound transmission from inverter housing, as there will always be a degree of noise emission, however small. Acceptable distances or noise levels are not provided within the guidance. However, in any case the inverters and the Scheme would be offset from existing PRow by at least 15 m as committed to in Table 4.2 of the Outline OEMP [APP-197]. The British Horse Society also published a document entitled <i>Noise and routes with horse use</i> in June 2025. Within this document it states: <i>"Considering how similar a noise may be to a natural predator is a useful guide to whether a horse will be troubled by it. A quiet rustling is likely to have greater impact than a high speed train because the former could</i>

ID	Theme	Representation	Applicant's Response
			<i>easily be associated with a predatory animal moving into position to attack whereas a flow of motor traffic is a continuous steady loud noise which is less likely to be a predator; it can be heard from far away and the majority of horses these days have been exposed to and accepted commonly occurring mechanical noises from their birth. There are many situations of horses unperturbed by trains or motor traffic, even for the first time, in fields or on bridleways alongside a railway or motorway."</i> In this respect, horses are not expected to be exposed to sudden noise from the Scheme during operation, as they would have their noise exposure gradually increased as they become closer to the noise source. Research presented in <i>Constant traffic noise affects the behaviour and physiology of naïve horses at pasture</i> (Malsburg et al, 2026) suggests that vigilance (alertness and startle response) is affected by the level of noise exposure. The research does not

ID	Theme	Representation	Applicant's Response
			present the effects below sound levels of 50 dB, and therefore it is not clear if effects may occur at this level. However, at the lowest levels of exposure within the research (54 dB) there appeared to be no significant statistical change in vigilance. With the calculated sound levels in PRowS being below 50 dB $L_{Aeq,T}$, noise effects on equestrian users are not expected to be significant.
BEPS-362	Noise and Vibration	Health, amenity and mental wellbeing are inadequately addressed Norfolk County Council Public Health stated that the ES should contain a dedicated assessment of mental health and wellbeing impacts, including in-combination effects and specific consideration of vulnerable populations. NCC recorded that the chosen substation location and enlarged infrastructure near Great Moulton heighten the potential for disturbance and adverse amenity effects and that there was no evidence at that stage of the physical or mental health implications of those changes. That broader health context is not properly reflected in the applicant's acoustics-focused treatment of Chapter 12. Noise in this case is not just a numeric threshold issue. It is part of a wider disturbance environment affecting	The assessment of noise presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] is founded on NOAELs, LOAELs and SOAELs, which are described in Table 12-4. Levels which are below the LOAEL are defined as: <i>“Noise can be heard, but does not cause any change in behaviour, attitude, or other physiological response. Can slightly affect the acoustic character of the area but not such that there is a change in the quality of life.”</i> Based on operational noise levels resulting in levels which are below the

ID	Theme	Representation	Applicant's Response
		tranquillity, perceived safety, stress and everyday quality of life, especially for vulnerable residents.	LOAEL, the health and amenity effects of noise are adequately considered and addressed The Applicant does not agree that health, amenity and mental wellbeing have been inadequately addressed. These matters are assessed within the Equality Impact Assessment [APP-214], which includes specific consideration of mental health and wellbeing concerns raised during consultation. The assessment applies the Mental Health and Wellbeing Impact Assessment (MWHIA) framework and considers factors including social inclusion, community cohesion, access to open space and PRow, neighbourhood character, perceived safety, noise, air quality and quality of life. The assessment identifies that some groups, including children, older people, disabled people, neurodivergent people, pregnant people and those with long-term health conditions, may be more sensitive to these effects. While temporary adverse effects during construction are

ID	Theme	Representation	Applicant's Response
			recognised, the assessment concludes that these would be reduced through mitigation and identifies potential benefits during operation through enhanced PRow connectivity and improved access to open and green spaces. Mental health impacts are therefore considered to have been appropriately assessed at a population level.
BEPS-363	Noise and Vibration	The Statutory Nuisance Statement does not cure the defects The Statutory Nuisance Statement simply adopts the applicant's position that no significant noise or vibration effects are anticipated and then says the Scheme would not give rise to statutory nuisance. It relies on Chapter 12 and the associated management plans, and refers to a defence within the Draft DCO in relation to noise nuisance proceedings. That document does not overcome the substantive problems in the Chapter 12 evidence base. It does not provide any separate, detailed reasoning on receptor-specific construction effects, low-background rural conditions, or ecological noise effects. Nor does it answer SNC's concern that the BESS and substations may significantly affect amenity or amount to statutory nuisance absent major mitigation.	The Applicant has prepared a Statutory Nuisance Statement [APP-208]. This draws upon the assessment conclusions from Environmental Statement and concludes that the construction, operation and maintenance, and decommissioning of the Scheme would not give rise to any impacts that would constitute a statutory nuisance under Section 79(1) of the Environmental Protection Act 1990. The following commitments are included in the Outline OEMP [APP-197]: Noise from the BESS will achieve the predicted sound

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			levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. • The rating level from other elements will not exceed the background sound level at other residential receptors. • Specific sound levels on PRowWs will not exceed 55 dBA. The commitments demonstrate that significant adverse effects will be avoided and that adverse effects will be mitigated and minimised. The assessment considers receptor-specific construction effects and measured background sound levels. The effects of noise on ecological receptors are presented in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].
BEPS-364	Noise and Vibration	Ecological noise effects, especially on barbastelles, have not been properly assessed Chapter 12 is framed primarily as a human-receptor assessment. Ecological effects are cross-referred	An assessment of potential noise impacts to roosting bats during construction, operation, and decommissioning is set out within Sections 8.9.580-8.9.602 of Chapter

ID	Theme	Representation	Applicant's Response
		elsewhere, and operational ecological noise was largely scoped out. The Statutory Nuisance Statement confirms the same structure by treating noise as a matter of human health and amenity and containing no substantive bat or ecological noise assessment in its noise section. That is a serious omission in this case. The Scheme lies within a nationally important bat landscape with particular sensitivity for barbastelles. Yet no dedicated noise-disturbance assessment is provided for bats. There is no meaningful assessment of whether piling, HDD, inverter noise, BESS cooling fans, substations, construction compounds, traffic, or maintenance activity may affect barbastelle roosting, commuting, foraging, dark corridors or core sustenance areas. The applicant has therefore not demonstrated that ecological disturbance from noise and vibration has been lawfully and robustly addressed.	8 - Ecology and Biodiversity [APP-044]. An assessment of potential noise impacts to commuting and foraging bats during construction, operation, and decommissioning is set out within Sections 8.9.603 to 8.9.629 of ES Volume 1, Chapter 8 Ecology and Biodiversity [APP-044]. Mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032]. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059], include the retention and enhancement of field boundary features (hedgerows/ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit

ID	Theme	Representation	Applicant's Response
			of (amongst other species groups) bats. These measures will reduce the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing enhanced supporting habitats surrounding woodland parcels for the benefit of bats, thereby contributing towards the species favourable conservation status.
BEPS-365	Noise and Vibration	The cumulative noise case is not reliable The applicant concludes that cumulative operational noise effects would be minor adverse and not significant, but South Norfolk Council directly disputed that conclusion on the basis that the BESS and substation noise impacts had not themselves been properly resolved. A cumulative conclusion is only as reliable as the individual component assessments. Where the operational case depends on additional mitigation and the construction case includes multiple moderate and major adverse HDD outcomes, the cumulative noise case cannot safely be treated as settled.	ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] includes a comprehensive assessment of cumulative noise. The following commitments are included in the Outline OEMP [APP-197]: Noise from the BESS will achieve the predicted sound levels in Chapter 12 of the ES (ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]).

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			- The rating level from other elements including substations of the Scheme will not exceed the background sound level at other residential receptors. - Specific sound levels due to plant on the Scheme on PRowS will not exceed 55 dBA. The assessment considers that the effects are not significant due to the duration of exposure. The applicant acknowledges that the SOAEL could be exceeded due to any night-time HDD works at specific receptors. However, mitigation will be employed to mitigate noise effects as far as practicable. Table 3.7 within the Outline CEMP [APP-196] commits to seeking Section 61 consent from the relevant planning authority where works are anticipated to generate significant noise effects outside of standard working hours.
BEPS-366	Noise and Vibration	Conclusion	The Applicant refers to its response to BEPS-348 to BEPS-364.

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		Taken together, the applicant's own material shows that the noise and vibration assessment is more fragile than the headline 'not significant' conclusion suggests. The baseline confirms very quiet rural receptor environments. The modelling shows adverse early-morning operational outcomes before additional mitigation is assumed. The construction appendix identifies moderate and major adverse HDD effects at several receptors and accepts that access road works may exceed SOAEL close to high sensitivity receptors. The BS 4142 feature correction approach is highly favourable to the applicant. Receptor sensitivity and outdoor amenity have been questioned by the local authority. Ecological noise effects, especially in relation to barbastelles, have not been properly assessed. Chapter 12 is primarily a human-receptor assessment, while operational ecological noise was largely scoped out. The Statutory Nuisance Statement confirms that noise is treated as a human health and amenity issue and contains no meaningful bat-noise assessment. That is a serious omission in a nationally important bat landscape, especially for barbastelles.	
BEPS-367	Noise and Vibration	Remedies sought BEPS requests that the Examining Authority give little weight to the applicant's present conclusion that noise and vibration effects are acceptable unless and until the applicant provides: a fuller receptor-specific reassessment of construction and operational effects; a stricter and	The Applicant refers to its response to BEPS-348 to BEPS-364.

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		clearly justified BS 4142 assessment including proper consideration of tonal and other acoustic features; a reassessment of early-morning and low-background rural impacts without reliance on vague future mitigation; a construction methodology that demonstrates the quietest practicable techniques, including avoidance of percussive piling; proper assessment of outdoor amenity, vulnerable users, PRow and equestrian receptors; and a dedicated ecological disturbance assessment addressing noise and vibration effects on bats, especially barbastelles. If those matters cannot be satisfactorily resolved, the Scheme should not be consented in its present form.	
BEPS-368	Air Quality	Chapter 13 – Air Quality Introduction The Applicant's air quality case does not provide a robust, spatially representative or fully assessed account of the likely air-quality effects of this unusually dispersed, multi-site solar, cable, substation and BESS NSIP. Although Chapter 13 is presented as an assessment of impacts during construction, operation and maintenance, and decommissioning, the chapter in substance narrows the assessment to selected road-traffic emissions on human and ecological receptors, while scoping out a number of other air-quality pathways acknowledged by the Applicant itself. Those include fugitive dust, non-road mobile machinery emissions, emergency generator emissions and BESS fire emissions.	The Applicant refers to its response to BEPS-370.

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		This is a fundamental weakness in a project of this scale, duration and fragmentation. The chapter confirms that the Scheme has the potential to affect air quality through construction, operation and decommissioning traffic, fugitive dust during construction and replacement activities, NRMM emissions, combustion plant emissions from emergency back-up generators, and BESS fire event emissions. Yet most of those pathways are not assessed as substantive ES effects within the chapter itself. The resulting assessment is therefore materially narrower than the project's actual air-quality risk profile.	
BEPS-369	Air Quality	Unrepresentative baseline and inappropriate reliance on Long Stratton roadside monitoring The baseline relied upon is not representative of the receiving environment across the Order Limits. Chapter 13 states that there is 'sufficient baseline data' and therefore no scheme-specific air quality monitoring was undertaken. It then relies on local authority monitoring locations, with the closest monitoring point identified as DT20 on the A140 in Long Stratton, and describes the closest and 'most representative' monitoring locations as those shown in Figure 13.1. Figure 13.1 shows plainly that the monitoring locations are clustered around Long Stratton and particularly the A140 corridor, i.e. the most traffic-influenced and polluted area in the locality, with no distributed monitoring across the wider predominantly rural scheme landscape. The measured	The Applicant considers that monitoring data from monitoring sites adjacent to the A140 in Long Stratton provide a worst-case baseline position for the study area. The methodology for defining air quality impacts is set out in Table 13.6 of ES Volume 1, Chapter 13 – Air Quality [APP-049], in accordance with Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) best practice guidance. The matrix in Table 13.6, uses the long-term average pollutant concentrations in the study area, combined with the predicted change in concentrations resulting from the

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		concentrations in Table 13.7 confirm that the Long Stratton roadside and near-roadside locations are appreciably higher than the more suburban Poringland location. For example, 2024 annual mean NO₂ values include 23.7 µg/m³ at DT7, 21.5 at DT19, 19.0 at DT25, 18.6 at DT21 and 18.2 at DT20, compared with 11.6 µg/m³ at DT3 in Poringland. That is not a realistic proxy for the wider baseline across quiet villages, farms, narrow lanes, PRoW, and ecological receptors throughout the Order Limits. A baseline dominated by a district-traffic-hotspot risks masking the significance of change in cleaner rural areas. In such locations, even modest increments in HGV movements, vehicle emissions and dust may represent a materially different and more intrusive change than the chapter's presentation implies. The Applicant's assertion that these Long Stratton locations are the 'most representative' monitoring points for the Order Limits is therefore unsound.	Scheme, to define the air quality impacts. It is evident from Table 13.6, that the higher the long-term average concentration at receptor locations, the greater the potential air quality impact. Therefore, considering baseline concentrations from monitoring locations adjacent to the A140, which is within the assessment study area, as a proxy for the long-term average concentrations across the wider study area, provides a robust worst-case assessment of air quality impacts.
BEPS-370	Air Quality	Generic screening criteria have been used as a substitute for a proper receptor-specific baseline Appendix 13.2 shows that the Applicant relies on generic EPUK/IAQM screening criteria as the gateway for deciding whether to proceed to detailed air-quality assessment. Those criteria include thresholds such as greater than 500 AADT LDV change elsewhere, greater than 100 AADT HDV change elsewhere, and a 5 mg/s screening criterion	ES Volume 1, Chapter 13 – Air Quality [APP-049] assesses the potential likely air quality effects of the Scheme in accordance with the methodology agreed through EIA Scoping and consultation. The screening criteria from best practice guidance produced by the EPUK & IAQM are used in ES Volume

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		for substantial combustion processes including emergency standby generators. Those criteria are only indicative screening tools. They do not remove the need for a robust, spatially representative baseline and receptor-led assessment. In this case the Applicant has combined generic threshold screening with a baseline dominated by Long Stratton roadside conditions. That combination risks understating effects on rural links and receptors where existing pollution is substantially lower and where changes in traffic and exposure may be more perceptible and more harmful. The fact that a traffic or emissions increase may fall below a broad screening trigger does not establish absence of meaningful air-quality harm in a dispersed rural environment.	1, Chapter 13 – Air Quality [APP-049] to determine whether a detailed assessment of air quality impacts is required. The EPUK & IAQM criteria are precautionary and are intended to function as a prompt for initiating a more detailed assessment where there is a possibility of a significant effect occurring. Where the screening criteria are not exceeded, air quality effects are deemed to be insignificant as the percentage change in concentrations would be negligible irrespective of the baseline environment.
BEPS-371	Air Quality	The chapter is structurally too narrow and scopes out material air-quality pathways Chapter 13 expressly states that the Scheme has the potential to affect air quality during construction, operation and decommissioning by five main routes: road traffic emissions, fugitive dust, NRMM emissions, emergency back-up generator emissions, and BESS fire event emissions. Yet the chapter then removes most of those pathways from substantive ES assessment. Construction, operational and decommissioning dust effects are scoped out of the ES chapter and relegated to a separate dust risk assessment and outline management plans. NRMM emissions during construction and	The scope of the ES Volume 1, Chapter 13 – Air Quality [APP-049] has been refined through the EIA Scoping and consultation process. The assessment presented in Chapter 13 therefore focusses on potential likely significant air quality effects as agreed through EIA Scoping. Whilst scoped out of the ES, dust emissions during construction, operation and decommissioning are assessed in ES Volume 3, Appendix 13.1 - Construction and

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		decommissioning are also scoped out. Emergency back-up generator emissions are scoped out despite the absence of a final specification. BESS fire event emissions are also scoped out from the chapter. That approach leaves the ES chapter focused largely on selected road-traffic impacts while treating other relevant air-quality pathways as matters for later control documents, appendices, or separate plans. For a project of this duration and geographical spread, that is not a sufficiently integrated or transparent assessment of likely significant effects.	Decommissioning Dust Risk Assessment [APP-180]. The dust risk assessment presented in ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment determines appropriate mitigation measures, in accordance with best practice guidance, for inclusion in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Detailed versions of these management plans are secured by Requirements 13, 14 and 21 of the Draft DCO [AS-032]. NRMM emissions are also controlled through the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198], which are secured by Requirements 13, 14 and 21 of the Draft DCO [AS-032], respectively. Air quality impacts during a BESS fire event are assessed in detail in the Plume Study presented in Appendix B of the Outline BSMP [APP-200]. The Outline BSMP sets out the mitigation measures required to mitigate the risk of potential air quality impacts during a BESS fire event and a detailed BSMP

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			is secured by Requirement 6 of the Draft DCO [AS-032]. As stated in ES Volume 1, Chapter 13 – Air Quality [APP-049], the back-up generator at the proposed National Grid Substation will be for emergency use only and therefore it's operation will be limited to routine testing and maintenance. Furthermore, the closest residential receptor to the National Grid Substation is more than 250m away. Further assessment of the impact of emissions associated with the backup generator will be undertaken pursuant to an OEMP requirement once the specification is known and proportionate mitigation will be defined, if required. Any mitigation proposed will ensure air quality impacts associated with back-up generator emissions are not significant.
BEPS-372	Air Quality	Over-reliance on deferred control documents rather than assessment within the ES The chapter repeatedly relies on outline plans and future mitigation rather than fully assessed and secured evidence at the point of examination. Dust is left to the dust risk assessment and outline CEMP, OEMP and DEMP. NRMM	The Applicant refers to its response to BEPS-371. ES Volume 1, Chapter 13 – Air Quality [APP-049] assesses the potential likely air quality effects of the Scheme in accordance with the

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		emissions are scoped out on the basis of future compliance measures. Generator emissions are scoped out on the basis that mitigation such as stack height and SCR is 'available' and that detailed assessment should only be undertaken later if emissions exceed the screening threshold once the generator specification is finalised. That is a classic deferral problem. The ES should assess what is actually sought, or assess a lawful worst case, rather than postpone the real technical analysis until after consent. This is especially true where the project includes emergency standby plant and long-term replacement and maintenance activities over a 60-year operational period.	methodology and effects agreed through EIA Scoping and consultation. A worst-case assessment has been undertaken at outline stage based on the information available at the time of assessment. The outline management plans are a standard method of securing measures, and any detailed management plan will be created when detailed design is known. The detailed management plans must be in accordance with the outline design and approved by relevant authorities.
BEPS-373	Air Quality	Emergency diesel generator emissions are inadequately addressed The chapter confirms that, where local grid connections are not possible, the National Grid substation will be equipped with a back-up diesel generator up to 500 kVA. It says the specification has not yet been defined, that operation would be infrequent, and that mitigation such as appropriate stack height and SCR is available. On that basis, generator emissions are scoped out of the ES, with only a later detailed assessment contemplated if emissions exceed the 5 mg/s EPUK/IAQM screening criterion once the specification is finalised.	The Applicant refers to its response to BEPS-371. The specification of any proposed generators has not yet been defined. However, as agreed with the local authorities through the EIA Scoping exercise, the potential air quality effects of back-up generator emissions are considered to be not significant in EIA terms. An assessment of generator emissions will be undertaken pursuant to an

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		That is inadequate. The existence of an emergency combustion plant is acknowledged, yet its detailed emissions profile is not assessed because the specification is still undefined. The ES should not ask the decision-maker to assume that the generator will be insignificant and then leave the real air-quality analysis to a later stage. The chapter should either have assessed a robust worst case or provided a final design and emissions case capable of examination now.	OEMP requirement once the specification of the generators has been finalised. Any mitigation proposed will ensure air quality impacts associated with back-up generator emissions are not significant.
BEPS-374	Air Quality	Operational air-quality effects are understated, especially over a 60-year project life The chapter's treatment of operational air quality is too dismissive for a project with an operational life of up to 60 years. PINS accepted the scoping out of operational traffic and combustion emissions only on the basis that the ES would provide information on the nature of maintenance traffic, frequency, estimated movements alone and cumulatively, and confirm that there would be no operational plant emissions requiring further assessment. However, the Applicant's earlier scoping material itself acknowledged that panels may be replaced up to two times and batteries up to four times over the lifetime of the Scheme, while still asserting that the resulting vehicle movements would be fewer than construction and that effects could therefore be scoped out provided similar mitigation is in place. This is a thin and assumption-led	Operational road traffic information, including the nature of maintenance traffic, frequency and estimated movements during both maintenance and replacement activities are set out in the Outline OTMP [APP-202]. The predicted total peak daily construction vehicle movements assessed in ES Volume 1, Chapter 13 – Air Quality [APP-049], are greater than the predicted vehicle movements resulting from maintenance and replacement activities during the operational phase. Therefore, as the effect of the construction phase road traffic emissions were assessed to be not significant, no further assessment

ID	Theme	Representation	Applicant's Response
		basis on which to remove repeated replacement activity from substantive assessment. Replacement traffic, removal of waste materials, delivery of replacement components, and associated dust and PM exposure over many decades are plainly part of the scheme's real operational footprint.	is required for the road traffic emissions associated with the maintenance and replacement activities during the operational phase. The Outline OTMP [APP-202] also sets out transport-related mitigation which will be in place during the operational phase and will contribute towards minimising air quality impacts during replacement activities. Mitigation within the Outline OTMP [APP-202] includes: • A Replacement Activities Worker Travel Plan (RAWTP). • Minibus provision to transport workers to and from the Scheme and internally within the Scheme. • Scheduling of HGV activities, where practicable, outside of traditional morning and evening peak hours. • No idling vehicles. A detailed OTMP, substantially in accordance with the Outline OTMP

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			[APP-202] is secured by Requirement 16 of the Draft DCO [AS-032]. Mitigation measures to control fugitive emissions of dust during BESS and panel replacement activities in the operational phase are set out in Table 3.8 of the Outline OEMP [APP-197]. The mitigation measures included in the Outline OEMP [APP-197] are for 'high risk' sites in accordance with IAQM guidance. A detailed OEMP is secured by Requirement 14 of the Draft DCO [AS-032]. The Applicant clarifies that the photovoltaic panels will only be replaced once and the BESS will be replaced up to five times over the lifetime of the scheme. This clarification is for information purposes only and does not have an impact on the air quality assessment.
BEPS-375	Air Quality	Decommissioning assessment remains too limited relative to PINS' scoping direction The Scoping Opinion expressly refused to allow decommissioning air-quality effects to be scoped out and required the ES to include an assessment of dust emissions and road traffic emissions during	An assessment of fugitive dust emissions during decommissioning is presented in ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]. The

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		decommissioning where significant effects are likely, or otherwise to justify why they are not. Although Chapter 13 does include decommissioning within its overall road-traffic framework, the chapter still follows the same broader pattern of narrowing scope and leaning on management plans. That is problematic because decommissioning of a large, dispersed, multi-site NSIP with repeated access points, compounds, cable works and material removal has the capacity to generate substantial local dust and vehicle emissions. A properly robust decommissioning case should be evidenced directly, not treated as a downstream management matter.	assessment presented in Appendix 13.1 provides justification that the air quality effects resulting from emissions of dust during the decommissioning phase will not be significant in EIA terms following implementation of dust mitigation measures from best practice guidance produced by the IAQM. As such, assessment is not required within the ES. Mitigation measures to control dust emissions during the decommissioning phase are set out in the Outline DEMP [APP-198]. A detailed DEMP, which will be substantially in accordance with the Outline DEMP [APP-198] is secured by Requirement 21 of the Draft DCO [AS-032]. The air quality effects of road traffic emissions during the decommissioning phase are assessed in ES Volume 1, Chapter 13 – Air Quality [APP-049]. The assessment takes into account predicted decommissioning traffic and reductions in vehicle emissions over the 60-year lifetime of the Scheme. The air quality effects of road traffic emissions during the decommissioning

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			phase are not considered to be 'significant'.
BEPS-376	Air Quality	The chapter does not satisfactorily address PM_{2.5} minimisation in a vulnerable rural community and ecology context PINS specifically drew attention to DEFRA's PM_{2.5} interim planning guidance and said the ES should explain how key sources of air pollution had been identified and how action had been taken to minimise emissions of PM_{2.5} or its precursors. The chapter refers generally to indicative PM₁₀ and PM_{2.5} information and to mitigation in outline management plans, but the treatment remains broad and threshold-led. It does not adequately grapple with the fact that PM_{2.5} is a non-threshold pollutant, that lower-background rural areas may still experience meaningful changes in exposure, and that vulnerable receptors in villages and on narrow roads may include children, older residents, people with respiratory conditions, and those exposed outdoors for sustained periods. The chapter's methodology is therefore insufficiently sensitive to the public-health significance of incremental particulate exposure in the actual receiving environment. There is no proper analysis of the impact of increased PM_{2.5} levels on sensitive local ecology, which is a serious	The assessment presented in ES Volume 1, Chapter 13 – Air Quality [APP-049] has been carried out in accordance with the methodology agreed through EIA Scoping and consultation. The assessment considers PM_{2.5} in relation to compliance with national air quality objectives and targets as set out in relevant legislation and national policy. This includes the Air Quality Standards Regulations 2010 Limit Value for annual mean PM_{2.5}, as well as the more stringent Environmental Improvement Plan interim annual mean concentration target for PM_{2.5}. There are no air quality standards for PM_{2.5} with regards to the protection of vegetation and ecosystems in the UK and assessment of PM_{2.5} on ecological receptors is therefore not required by any current guidance or legislation. The air quality impacts (including PM_{2.5}) of road traffic emissions associated with the Scheme have been

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		omission given that it is a nationally important landscape for rare Annex II bats.	determined to be 'negligible' in ES Volume 1, Chapter 13 Air Quality [APP-049]. Furthermore, PM_{2.5} has been considered throughout the construction and decommissioning dust risk assessment presented in ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]. Several mitigation measures are proposed that will contribute towards reducing emissions of PM_{2.5} resulting from road traffic and construction related dust, as well as exposure to PM_{2.5}. These mitigation measures are set in the following management plans: • Outline CEMP [APP-196] • Outline OEMP [APP-197] • Outline CTMP [APP-201] • Outline OTMP [APP-202] • Outline DEMP [APP-198] • Outline LEMP [APP-199]

ID	Theme	Representation	Applicant's Response
			Detailed versions of the above management plans, which will be substantially in accordance with the outline management plans, are secured through Requirements 13, 14, 15, 16, 21 and 7 of the Draft DCO [AS-032] , respectively.
BEPS-377	Air Quality	Cumulative air-quality effects require closer scrutiny The project has consistently raised wider concerns about cumulative impacts with other energy, infrastructure and development schemes. The Applicant's original scoping position had been that significant cumulative air-quality effects were unlikely because of low traffic flows and the absence of nearby committed developments within 250 metres, though that was to be reviewed at ES stage. Given the scale of other planned or emerging energy, house building and transport-related works in the area, the cumulative air-quality conclusions in Chapter 13 require close scrutiny against the actual cumulative project list used elsewhere in the ES. Any omission or undercounting of overlapping construction periods, shared haul routes, or nearby energy infrastructure would materially weaken the chapter's air-quality conclusions. This is particularly important where the scheme already relies on generic screening thresholds and an unrepresentative baseline.	The effects of dust emissions resulting from the Scheme are mitigated through the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Detailed versions of these management plans are secured by Requirements 13, 14 and 21 of the Draft DCO [AS-032]. The mitigation secured through these management plans is sufficient to ensure that effects resulting from dust emissions will not be 'significant', including when considered cumulatively with other developments. ES Volume 1, Chapter 13 - Air Quality [APP-049] assesses the air quality effects of construction traffic emissions on human and ecological receptors including cumulative effects with other developments. The cumulative developments included

ID	Theme	Representation	Applicant's Response
			within the traffic data underpinning the assessment were agreed with Norfolk County Council as the Local Highway Authority.
BEPS-378	Air Quality	The study area and traffic data limitations reinforce the risk of underassessment Chapter 13 says that for construction road-traffic assessment the EPUK/IAQM screening criteria were applied only to roads for which traffic data had been provided. That creates an obvious dependency on the transport study area and selected links. If routes evolve, intensify, or omit sensitive rural links, the air-quality assessment will inherit those limitations. On a project with many access points and a dispersed footprint, that is a material concern. The absence of scheme-specific monitoring and the concentration of existing monitoring in Long Stratton only intensify that limitation.	The construction traffic routing which has informed the assessment of construction traffic emissions presented in ES Volume 1, Chapter 13 – Air Quality [APP-049] is controlled through the Outline CTMP [APP-201]. The use of baseline air quality monitoring data from roadside monitoring locations in Long Stratton provides a worst-case assessment of air quality impacts in ES Volume 1, Chapter 13 - Air Quality [APP-049] as, in accordance with the criteria within best practice guidance produced by EPUK & IAQM, higher baseline concentrations would result in a greater air quality impact. Scheme-specific monitoring of particulate matter concentrations during construction is proposed through the Outline CEMP [APP-196] and a detailed CEMP is secured by

ID	Theme	Representation	Applicant's Response
			Requirement 13 of the Draft DCO [AS-032].
BEPS-379	Air Quality	The overall conclusion of no significant effects is not robustly demonstrated Taken together, the chapter's methodology is not robust enough to support a confident conclusion of no significant air-quality effects across the project as a whole. The baseline is skewed to the main traffic hotspot. Generic screening criteria are used as a principal filtering tool. Dust, NRMM, combustion plant and BESS fire emissions are largely pushed outside the substantive chapter. Operational and replacement-phase impacts are treated as intrinsically minor. Decommissioning is not addressed with the level of project-specific evidence such a scheme requires. For those reasons, the Applicant has not demonstrated that Chapter 13 provides a complete, representative and examination-ready assessment of likely significant air-quality effects.	The Applicant refers to its response to BEPS-367- 377.
BEPS-380	Air Quality	Remedies sought The Examining Authority is requested to require the Applicant to provide supplementary environmental information which:	The Applicant refers to its response to BEPS-367- 377.

ID	Theme	Representation	Applicant's Response
		- establishes a genuinely representative baseline across the rural Order Limits rather than relying predominantly on Long Stratton roadside monitoring; - reassesses road-traffic, particulate and dust effects using receptor-specific analysis for rural villages, lanes, PRow and ecological receptors; - provides a full and examination-ready assessment of emergency generator emissions based on a defined specification or lawful worst case; - explains and assesses operational, maintenance, panel replacement and battery replacement air-quality effects over the full 60-year project life; - provides a clearer and more evidenced decommissioning air-quality case; - demonstrates compliance with the PM_{2.5} minimisation expectations identified by PINS; and - re-runs cumulative air-quality assessment against a complete and agreed cumulative scheme list and the final transport routing assumptions. If the Applicant cannot do so, the air-quality case should be treated as materially incomplete and insufficient to support consent.	
BEPS-381	Socio-Economics	Chapter 14 – Socio-Economics Overview	The Applicant has considered SCC's Supplementary Guidance Document for Socio-Economic Effects (document

ID	Theme	Representation	Applicant's Response
		BEPS objects to the Applicant's socio-economic case for East Pye Solar on the basis that Chapter 14 is structurally too narrow, overly generic, fragmented across multiple application documents, and insufficiently rooted in the realities of the host communities most affected by the Scheme. Chapter 14 states that its assessment is confined to four matters only: employment; education, skills, training and supply chain opportunities; temporary workers' accommodation; and changes to local tourism assets. It does not itself assess a broader range of socio-economic effects arising from a 60-year, highly dispersed industrial energy scheme imposed across multiple rural settlements and landscapes. That narrow framing is especially problematic because the Planning Inspectorate required a socio-economic assessment to be included in the ES and recorded that it should have regard to Suffolk County Council's supplementary guidance on the socio-economic effects of NSIPs. Chapter 14 says it has followed that guidance, but the content of the chapter does not demonstrate a genuinely broad or integrated socio-economic assessment.	dated January 2025), and this has informed the preparation of ES Volume 1, Chapter 14 – Socio-Economics [APP-050], for instance with respect to the effects included in the analysis. We acknowledge that socio-economic considerations do overlap with other technical topics, but these are covered in other ES chapters, detailed in the following response.
BEPS-382	Socio-Economics	Artificially Narrow Scope of Assessment Chapter 14 expressly limits the socio-economic assessment to jobs, skills, temporary accommodation and tourism assets. The chapter's own methodology section confirms that, prior to mitigation, the Scheme is only	There is overlap between socio-economic considerations and other technical topics. These are detailed in other ES chapters in order that each is assessed by the most relevant subject

ID	Theme	Representation	Applicant's Response
		assessed as potentially affecting employment, skills and training, temporary accommodation, and the local tourism economy. That approach leaves out or pushes elsewhere a number of matters that are plainly socio-economic in nature in a rural scheme of this scale, including: • effects on rural businesses beyond tourism • effects on farm businesses and farm-linked economic activity • commuting and access disruption as socio-economic effects • community cohesion and rural identity • distributional inequality between host communities and wider beneficiaries • mental health and wellbeing impacts tied to neighbourhood change • the long-term opportunity cost of converting productive land and rural space for 60 years.	matter experts. The socio-economic chapter therefore focuses solely on those matters which are purely socio-economic in nature, but the Applicant acknowledges that other socio-economic impacts may arise from areas not assessed within this chapter. These are covered in the chapters listed below. ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] provides an assessment on agricultural businesses (with effects assessed for Construction, Operation and Maintenance, and Decommissioning phases, i.e. over the long term, including effects on food production and soils) with a farming report provided in ES Volume 3, Appendix 15.2 - Farm Reports [APP-183]. Impacts on commuting are assessed in ES Volume 1, Chapter 11 – Transport and Access [APP-047]. Impacts on cohesion and inequalities are relevant to the Human Health Summary Statement, included within ES Volume 1, Chapter 18 – Other

ID	Theme	Representation	Applicant's Response
		This goes to the substance of whether the socio-economic assessment is fit for purpose.	Environmental Matters [APP-054]. This also includes explanation of how mental health and wellbeing concerns have been addressed.
BEPS-383	Socio-Economics	Broad Study Area Masks Localised Harm Figure 14.1 demonstrates that the Applicant's socio-economic 'Local Area' is drawn at a broad South Norfolk scale. The map shows the red Order Limits as a dispersed but relatively narrow network, while the blue 'Local Area' extends over a much wider geography. Chapter 14 says multiple study areas are used because socio-economic effects can occur at different spatial levels, and defines the 'Local Area' by a group of Lower Layer Super Output Areas surrounding the Order Limits. That may be acceptable for some demographic and labour-market statistics, but it is too coarse for many of the Scheme's real socio-economic burdens. Effects on households, nearby settlements, local lanes, public rights of way, tourism-dependent microbusinesses, equestrian users, farmsteads and parish-scale community life are highly concentrated. Broad-area averaging smooths out the intensity of those burdens and makes the impacts appear more diffuse and less serious than they are in reality. The same problem appears when residential receptors are considered. The Residential Receptors Plan maps named	The choice of Lower Layer Super Output Areas to construct the Local Area for study was informed by the need to balance granularity of analysis with data availability. The resulting study area, as shown in ES Volume 2, Figure 14.1 - Socio Economic Study Areas, includes the entirety of the Order Limits and surrounding settlements. As shown in Table 14.7 of ES Volume 1, Chapter 14 – Socio-Economics [APP-050], this area has a population of 16,600, which is just over 11% of the 148,400 in South Norfolk overall. It therefore represents a focused study area within the South Norfolk context. Moreover, the scope of the Socio-Economics chapter covers employment effects; educational, skills, training and supply chain opportunities; demand for temporary

ID	Theme	Representation	Applicant's Response
		dwellings within 100m, 250m and 500m of the Scheme, including Boyland House, Willow Lodge, Plumtree Cottage, Frith Farm, Broadgate Lodge Bungalows, New House Farm, Cherry Tree Barn, Hillcrest Court apartments, Friends House C Annexe, Oakdene Cottage, Dawsons Farm and Brooke Manor C Annexe. These are intensely localised receptors. Their harms cannot realistically be understood by reference to a broad socio-economic study area.	accommodation; and local tourism assets.
BEPS-394	Socio-Economics	Failure to Assess Local Community and Business Impacts Properly This omission is particularly significant because consultees expressly raised concerns about local communities and businesses. Chapter 14's own consultation table records that Norfolk County Council asked for socio-economic impacts to be scoped in, specifically including implications for local communities and businesses, loss of agricultural land, and wider economic implications. Parish councils and local groups also raised concerns about tourism, PRoW and local business impacts. The chapter's response was largely to disaggregate those matters into other chapters rather than assess them coherently within Chapter 14 itself. That fragmentation means there is no single place in the ES where the Examining Authority can see the combined socio-economic burden on host communities and businesses from landscape change, access disruption,	Socio-Economic matters were scoped in following consultation with PINS. ES Volume 1, Chapter 14 – Socio-Economics [APP-050] concluded that there would be significant, beneficial effects on the local economy during all phases of the Scheme, and no significant adverse effects on the tourism industry. Some socio-economic matters overlap with other disciplines (as discussed in response to BEPS-382); these are addressed comprehensively across the ES, however, in the following documents: Glint and glare: ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]

ID	Theme	Representation	Applicant's Response
		traffic, amenity loss, uncertainty, industrialisation of the countryside, and reduced attractiveness of the area for living, visiting and investing.	Agricultural land: ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], and ES Volume 3, Appendix 15.2 - Farm Reports [APP-183] PRoW: ES Volume 1, Chapter 7 – Landscape & Visual [APP-043], and ES Volume 1, Chapter 11 – Transport and Access [APP-047].
BEPS-385	Socio-Economics	Inconsistency with the Applicant's Own Approach in The Drovers DCO Application The Applicant's own approach in The Drovers shows that East Pye has been selectively narrowed. The Drovers Chapter 14 expressly includes land use and commuting patterns as assessed socio-economic effects, alongside employment, skills, accommodation and tourism. The Drovers also contains a specific assessment of the 'effect on land uses' and 'changes in commuting patterns'. By contrast, East Pye Chapter 14 omits land use and commuting patterns from the list of socio-economic effects it assesses. That is a useful comparator because it shows the omissions in East Pye Solar are not inherent to solar NSIP methodology. The same developer has previously treated land use and commuting as socio-economic issues. East Pye's narrower scope is therefore a choice, and one which	The Drovers Chapter 14 reports impacts sourced from a Transport and Access Chapter 9 and Soils and Agriculture Chapter 11. Comparable analysis is provided for this scheme in ES Volume 1, Chapter 11 – Transport and Access [APP-047] and ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], for example impacts on traffic delays and farm businesses. As such, the approach hasn't been narrowed but rather an alternative approach to presentation taken.

ID	Theme	Representation	Applicant's Response
		has the effect of understating adverse socio-economic impacts on host communities.	
BEPS-386	Socio-Economics	Failure to Assess Agricultural and Farm-Business Economics as Socio-Economic Effects East Pye's local economy is materially rural. Chapter 14 records that agriculture, forestry and fishing account for 5% of employment in the Local Area, which is higher than South Norfolk, Norfolk, Suffolk, the East of England and England. It also records a strong local concentration in construction-related employment. Despite that, Chapter 14 does not assess the socio-economic consequences of land-use change on farm businesses and the wider rural economy. Norfolk County Council specifically asked for implications arising from the loss of agricultural land to be addressed. The chapter's response was simply to say agricultural land is considered in Chapter 15. That is inadequate. Agricultural land is not only an environmental or soil resource. It is an economic asset. Removing or constraining land for decades affects farm structure, contracting patterns, labour use, rotations, supplier relationships, local food production and the long-term resilience of the rural economy. Those are socio-economic effects and should have been assessed as such in Chapter 14.	The Applicant refers to its response to BEPS-384. The assessment of the impacts on farm labour are considered in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. Paragraph 15.8.121 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] concludes that whilst the wider economic effects are difficult to assess: (i) direct expenditure in some supply sectors will decrease, but will increase in other agricultural supply sectors; (ii) the management of sheep requires more labour per hectare than arable cropping; (iii) overall the impact on the wider rural economy should be seen in context, such as the 15-16% of arable land currently not being cropped (albeit it is being managed).

ID	Theme	Representation	Applicant's Response
BEPS-387	Socio-Economics	Tourism and the Rural Experience Economy Are Under-Assessed Chapter 14 includes tourism assets, but the assessment remains too generic and too weak for an area where the value of the rural environment, countryside access, tranquillity, heritage setting and local attractions are interdependent. Chapter 14 records 2,580 people employed within the tourism industry in South Norfolk and notes a range of tourism baseline data. Consultees specifically raised concerns over negative effects on tourism and tourism-reliant businesses. However, the chapter does not appear to engage sufficiently with the scheme's dependence on a landscape that supports visitor enjoyment, local heritage visits, rights of way, gliding and small visitor attractions. Nor does it assess with any real granularity how the industrialisation of views, disruption to PRow, traffic pressure, noise and the erosion of rural character may affect the local experience economy. The EQUIA itself tacitly confirms this weakness. It notes that tourism business impacts may be felt differently depending on proximity and business type, even while the ES treats tourism receptors as only minor adverse and non-significant.	Socio-Economics: ES Volume 1, Chapter 14 – Socio-Economics [APP-050] assesses the sensitivity of the tourism industry receptor as Medium (Table 14.4). This reflects that the share of South Norfolk's employment in tourism is comparable to the regional level (Table 14.14). The Minor Adverse impact on the tourism industry assessed for the Construction Phase, Operation and Maintenance Phase, and Decommissioning Phase (including in the cumulative assessment) reflects expected Low magnitudes of impact; these are based on: • There being no known tourism assets within the Order Limits, with the exception of a limited area of the Pulham Patch activity farm, for which losses will be addressed through an agreed compensation arrangement • The potential for disruption during construction, but the countervailing potential for

ID	Theme	Representation	Applicant's Response
			additional expenditure by the workforce to benefit the tourism industry The potential for glint and glare from the scheme during its operation to affect the tourism industry The assessed sensitivity of the tourism industry therefore reflects its importance within the South Norfolk economy. The Applicant considers that the assessment is appropriate and the scale and nature of effect is justified.
BEPS-388	Socio-Economics	Construction Workforce Benefits Are Speculative The chapter's claimed labour-market benefits are not as strong as the Applicant suggests. The Outline Employment, Skills and Supply Chain Strategy states that construction is expected to support an average of 278 workers per day, with a peak of 720 workers, equivalent to 604 FTE jobs. It then applies a 50% displacement rate and a 1.9 multiplier, producing 1,044 net additional jobs during construction, but only 29 of those are attributed to South Norfolk and 116 to Norfolk. That means the Applicant's own figures show that the overwhelming majority of claimed labour benefits do not accrue to the most directly affected host area. The local	The Applicant does not agree that the chapter claims labour-market benefits stronger than suggested. In ES Volume 1, Chapter 14 – Socio-Economics [APP-050], BRES data on the utility construction workforce is used to provide a realistic estimate of the proportion of the workforce which could originate from the local area (shown in Table 14.22). The magnitude of local employment impacts is assessed and found to be Negligible for South Norfolk, Norfolk, and the East

ID	Theme	Representation	Applicant's Response
		economic upside is limited, while the local environmental and social burdens are substantial. The same document acknowledges that specialised solar PV professionals are likely to come from outside South Norfolk and Norfolk. That reinforces the concern that local benefits are diffuse and external, whereas local harms are concentrated.	of England, reflecting the limited size of estimated impacts in the context of total resident employment.
BEPS-389	Socio-Economics	The ESSCS Is Outline, Aspirational and Deferred The Outline Employment, Skills and Supply Chain Strategy repeatedly uses soft and contingent language: the Applicant 'will seek opportunities', 'will explore collaboration', 'may include', and 'will consider' various measures. It also makes clear that the detailed ESSCS will only be prepared and submitted before construction starts. Its outputs and outcomes are framed as 'potential outputs' and 'potential outcomes,' rather than binding quantified commitments. So, while APP/7.10 contains more text about employment, skills and supply chain than Chapter 14 itself, it remains an outline strategy which defers substance until after consent. It is not a secured, quantified or robust local benefit package.	The detailed Employment, Skills and Supply Chain Strategy (dESSCS) to be prepared as per Requirement 19 of the Draft DCO [AS-023] will be informed by continuous engagement with relevant stakeholders. The timeline for development of the dESSCS is set out in Table 7.1 of the Outline Employment, Skills and Supply Chain Strategy (Outline ESSCS) [APP-205]. The dESSCS will be in accordance with this and is secured by the DCO.
BEPS-390	Socio-Economics	No Meaningful Community Benefit Package There is no meaningful community benefit package proportionate to the scale and duration of the Scheme.	The Community Benefit Fund does not form part of the DCO Application. Therefore, it cannot be considered in the decision-making process for determining the DCO Application.

ID	Theme	Representation	Applicant's Response
		What East Pye offers is essentially a labour-market and outreach strategy: apprenticeships, local recruitment channels, education links, site visits, supplier events and annual reporting. That is not the same thing as a genuine community benefit offer. There is no annual community benefit fund, no secured compensation mechanism, no local tariff or discount proposal, no shared ownership, no enduring community legacy plan, and no transparent local governance structure for distributing benefits. This omission is especially notable because Norfolk County Council expressly expected appropriate compensation for affected households, communities and businesses, and expected a voluntary community benefits fund to be established by the Applicant. It also expected reference to such a fund to be scoped into the ES. The Applicant has not provided that.	However, it will be available to fund local projects. The Applicant will continue engagement post-application, to support the development and delivery of community benefits. Information on the mechanics of the Community Benefit Fund and the areas to which it will contribute will be developed through consultation with South Norfolk Council and Norfolk County Council.
BEPS-391	Socio-Economics	Fragmentation Across Chapter 14, the ESSCS and the EQUIA A major defect in the application is that socio-economic and community effects are dispersed across several documents, which obscures the real planning balance. The EQUIA expressly states that it draws on Chapter 14 and the Outline ESSCS, and assesses disproportionate	The Applicant refers to its response to BEPS-381 and BEPS-393 in relation to the coverage of ES Volume 1, Chapter 14 – Socio-Economics [APP-050]. The Equality Impact Assessment [APP-214] draws on the findings of the Environmental Statement, including ES Volume 1, Chapter 14 – Socio-

ID	Theme	Representation	Applicant's Response
		and differential effects on protected groups rather than replacing the core socio-economic assessment. Yet the EQUIA identifies a range of impact pathways which are plainly socio-economic and community-facing in substance: PRow severance, pedestrian fear and intimidation from traffic, accessibility impacts, changes in views and landscape character, noise and vibration, dust and air pollutants, employment and skills effects, and mental health-related equality effects. These pathways affect how people live, move, access services, use public space, experience place, and participate in local community life. They are integral to socio-economic reality. But instead of being integrated into a coherent socio-economic narrative, they are parcelled out across separate documents.	Economics [APP-050], and relevant management plans to assess whether Scheme impacts could result in differential or disproportionate effects on protected characteristic groups. The Equality Impact Assessment [APP-214] does not replace the socio-economic assessment. Instead, it considers equality-related issues, including PRow severance, access to community infrastructure, traffic-related fear and intimidation, noise, air quality, landscape change, employment and mental wellbeing, drawing together the findings of the relevant ES assessments where they are relevant to protected characteristic groups. This provides a clear basis for considering equality-related community effects alongside the wider ES.
BEPS-392	Socio-Economics	Over-Reliance on Mitigation to Reduce Harms to 'Neutral' The EQUIA is highly mitigation-reliant. It repeatedly identifies pathways for adverse effects on older people, disabled people, children, carers and pregnant people, but then classifies most impacts as 'neutral' post-mitigation. See PRow severance, traffic intimidation, accessibility impacts, noise and vibration, and dust and air pollutants.	The Applicant does not agree that the Equality Impact Assessment [APP-214] gives insufficient weight to potential equality effects. The assessment identifies a range of potential adverse impacts that may disproportionately affect protected characteristic groups, including older

ID	Theme	Representation	Applicant's Response
		Even where the EQUIA recognises mental health-related equality effects linked to access to nature, visual amenity, neighbourhood change, safety fears and perceived lack of control, it still tends to neutralise those concerns at a population level through mitigation assumptions. The effect is to acknowledge the harm pathways while stripping them of weight in the final assessment. That is not a convincing basis on which to conclude that local communities will not experience material socio-economic and community harm.	people, disabled people, children, carers and pregnant people, and considers whether these effects would be differential or disproportionate compared with the wider population. Consistent with its methodology, the assessment evaluates these effects taking account of the embedded and secured mitigation measures for the Scheme, including traffic, access, PRoW and construction environmental management measures. The residual conclusions therefore reflect the anticipated effects after mitigation has been implemented, rather than disregarding the identified impact pathways. The Equality Impact Assessment [APP-214] also acknowledges that individuals may experience effects differently and that some impacts are difficult to quantify. Its conclusions are reached at a population level, consistent with the purpose of the assessment, which is to identify and assess potential equality effects on protected characteristic groups rather

ID	Theme	Representation	Applicant's Response
			than predict impacts on individual residents.
BEPS-393	Socio-Economics	Consultation Concerns and Unequal Participation The EQUIA also acknowledges that comments were raised about the quality and extent of consultation, and says this may have had a dampening effect on engagement, particularly for equalities groups including people with disabilities and those with greater time constraints. BEPS has also had to complain about the inaccessibility of the DCO application documents, which are online available online. In a rural community with elderly residents, many of whom do not have a computer or internet access, this is a major barrier to accessibility and fair consultation. We have requested a copy of the application to be provided on paper in the local library as previously for the statutory consultation, however, this has not happened. That matters here because a socio-economic chapter depends on meaningful local engagement with those most affected. If the consultation process itself was less accessible or less effective for some of the most affected communities and groups, the baseline understanding of local need, business dependence, amenity use and lived vulnerability is likely to be weakened from the outset.	The Applicant acknowledges the concerns raised regarding consultation accessibility and participation. The Equality Impact Assessment [APP-214] recognises that accessible and inclusive consultation can help reduce barriers for protected characteristic groups, including older people, disabled people, carers, non-native English speakers and those with time constraints. The EQIA assesses impacts arising from the construction, operation, maintenance and decommissioning of the Scheme as opposed to the pre-application process. It is noted that the pre-application consultation included in-person and online events, accessible venues, alternative formats on request, multiple feedback channels, and access to materials online and at Community Access Points. Throughout the consultation period, anyone was welcome and encouraged

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			to get in touch using any of the free-to-use communication channels provided, including email, freephone, and post. Respondents were also invited to attend the in-person and virtual community information events, where they could view the maps and ask questions or seek clarification directly from the Applicant's project team. USB memory sticks with the full suite of application documentation were made available for electronic inspection during the Relevant Representation period via computer, free of charge, at the following libraries: Long Stratton Library, Loddon Library, Poringland Library and Bungay Community Library.
BEPS-394	Socio-Economics	Residential Receptors, Amenity and Perceived Value Impacts Residential receptor impacts should not be diluted within broad socio-economic averaging. Figure 7.9 identifies multiple named residential properties within 100m of the Scheme. Those receptors are primarily relevant to private visual amenity and living conditions, and therefore belong principally within Chapter 7 and the Residential Visual Amenity Assessment. However, they	Residential receptor impacts are without the scope of ES Volume 1: Chapter 14 – Socio-Economics [APP-050], which is set out in paragraph 14.1.4 of that document. The Applicant has prepared a Residential Visual Amenity Assessment [RVAA], as presented in ES Volume 2, Appendix 7.8 -

ID	Theme	Representation	Applicant's Response
		also matter to socio-economics because concentrated residential harm can have real effects on wellbeing, confidence, sense of place and the attractiveness of host communities. The EQUIA acknowledges that there is mixed and limited evidence on house price impacts, but also notes that some studies suggest significant impacts in specific orientation and distance circumstances, and accepts that concerns regarding housing and business values may affect mental health. Already residents in some locations, including Great Moulton, are finding it impossible to sell their houses due to the potential impacts of this scheme. The point here is not that property value should be treated as the main planning issue. It is that local residential amenity harm is real, concentrated and capable of feeding through into broader social and economic consequences for those host communities. Chapter 14 does not grapple with that reality.	Residential Visual Amenity Assessment [APP-148]. The RVAA has been undertaken in accordance with established industry guidance set out in the Landscape Institute [2019] Residential Visual Amenity Assessment [RVAA] Technical Guidance Note 2/19. The Applicant acknowledges concerns regarding property values and the potential effects this may have on residents' wellbeing. The Equality Impact Assessment [APP-214] recognises that concerns about housing and business values may influence mental wellbeing and quality of life. However, property values are not assessed as a standalone equality impact pathway. Instead, the assessment considers related factors such as residential amenity, landscape character and amenity, perceived safety and mental wellbeing, including for groups who may be more sensitive to environmental change. Taking these factors into account, the assessment does not identify significant adverse equality effects.

ID	Theme	Representation	Applicant's Response
BEPS-395	Socio-Economics	Distributional Inequality and Economic Fairness The application fails to address the unequal distribution of burdens and benefits. The Scheme's benefits are presented in regional and diffuse terms: construction activity, national energy objectives, some skills activity, some supplier opportunities. But the adverse burdens are highly local: visual change, traffic, PRow disruption, farm-business and tourism business interference, amenity loss, uncertainty, stress and rural industrialisation. The Applicant's own figures show only modest local job capture within South Norfolk relative to the scale of claimed total employment effect. Yet there is no meaningful compensation or benefit-sharing mechanism to address the concentrated burdens borne by specific parishes, settlements, businesses and households. That is a serious omission in a 60-year project.	The Equality Impact Assessment [APP-214] assesses whether the Scheme could result in differential or disproportionate effects on protected characteristic groups across consultation, construction, operation and decommissioning. It considers a range of impact pathways, including PRow severance, access to community infrastructure, traffic-related fear and intimidation, changes in views, noise, air quality, mental wellbeing, tourism and employment. The assessment also identifies potential benefits, including construction employment supporting an estimated 1,044 net direct and indirect jobs, around 29 of which are anticipated to be taken by South Norfolk residents, alongside wider skills, training and supply chain opportunities. The conclusions of the Equality Impact Assessment [APP-214] are focused on equality effects. The Planning Statement [APP-209] sets out the balance between local impacts and national need.

ID	Theme	Representation	Applicant's Response
BEPS-396	Socio-Economics	Consequence for the Planning Balance For all of these reasons, Chapter 14 does not provide a reliable basis for concluding that East Pye Solar will generate a favourable socio-economic balance for host communities. The chapter is too narrow in scope, too broad in spatial framing, too fragmented across documents, too speculative in its claimed benefits, too reliant on mitigation to neutralise harms, and too weak in its treatment of concentrated local burdens. It does not present a robust, integrated or transparent assessment of how this Scheme will affect the people and businesses who actually live and operate in the host landscape.	The Applicant refers to its response to BEPS-381 and BEPS-393 in relation to the coverage of ES Volume 1, Chapter 14 – Socio-Economics [APP-050].
BEPS-397	Socio-Economics	Conclusion Chapter 14 substantially understates the socio-economic consequences of East Pye Solar. It confines the assessment to a narrow set of topics, uses a broad study area that masks concentrated local impacts, omits important rural business and land-use effects, relies on an outline and aspirational ESSCS for its positive case, and fails to provide any meaningful community benefit or compensation package. When read together with the EQUIA and the residential receptor mapping, the application in fact demonstrates that the Scheme will impose highly localised and unequal burdens on host households, communities and businesses over a very long period, while offering only diffuse, weakly secured and	The Applicant refers to its response to BEPS-381 and BEPS-393 in relation to the coverage of ES Volume 1, Chapter 14 – Socio-Economics [APP-050]. The Applicant's response to the points raised here in relation to the Outline Employment, Skills and Supply Chain Strategy [APP-205] is in BEPS-388. The Equality Impact Assessment [APP-214] does not replace Chapter 14 but draws on the ES and relevant

ID	Theme	Representation	Applicant's Response
		largely external benefits in return. The Examining Authority should therefore attach limited weight to the Applicant's claimed socio-economic benefits and substantial weight to the under-assessed local harms.	management plans to assess whether the Scheme could result in differential or disproportionate effects on protected characteristic groups. Having considered these effects and the secured mitigation measures, the assessment does not identify likely substantial equality effects.
BEPS-398	Socio-Economics	Remedies sought The Applicant should be required to prepare and submit a revised socio-economic assessment that: - expands the scope of Chapter 14 to include land-use effects, farm-business effects, commuting impacts, rural business disruption, community cohesion, distributional equity and long-term opportunity cost; - uses a more granular host-community and parish-level assessment, rather than relying primarily on a broad South Norfolk 'Local Area' that smooths out localised harm; - integrates, in one place, the socio-economic implications of PRoW severance, access disruption, traffic intimidation, residential amenity loss, tourism harm and mental health-related community impacts; - provides a properly evidenced assessment of impacts on tourism-dependent and landscape-dependent local	As discussed in previous responses, the Applicant feels that the scope of ES Volume 1, Chapter 14 – Socio-Economics [APP-050] is appropriate, with the Environmental Statement more widely covering all areas necessary. ES Volume 3: EIA Scoping Report [APP-113] identifies a range of potential socio-economic effects, including those which would be covered by other chapters. It had initially proposed to scope out purely socio-economic matters (Employment and Skills; Economic Output; Tourist Accommodation; Tourism; Shops) (see Table 5.8); however, ES Volume 3, EIA Scoping Opinion [APP-114] from PINS said that these should be scoped in. It did not, however, challenge the

ID	Theme	Representation	Applicant's Response
		businesses, with site-specific analysis rather than broad generic assumptions; • provides a transparent and realistic assessment of labour-market leakage, local workforce availability, workforce transport implications and the true extent of local employment benefit; • replaces aspirational outline wording in the ESSCS with quantified, enforceable commitments, including targets for local employment, apprenticeships, training placements and local procurement; • includes a proper cumulative socio-economic assessment addressing the combined effects of East Pye with other major infrastructure and energy projects in the area; • brings forward a meaningful, secured community benefit and compensation package proportionate to the scale and duration of the Scheme, including a voluntary community benefit fund and direct mitigation or compensation for those households, communities and businesses most affected; and • explains clearly how the claimed socio-economic benefits are sufficient to outweigh the concentrated local burdens imposed on host communities.	allocation of topics (e.g. Farm Businesses, PRoW) to other chapters. The Outline Employment, Skills and Supply Chain Strategy [APP-205] will be progressed to a detailed ESSCS, secured through Requirement 19 of the Draft DCO [AS-032]. Efforts to provide specific benefits in locally impacted communities are set out in the Outline ESSCS [APP-205] for employment and economy and in the Outline LEMP [APP-199] in relation to landscape and through the provision of community benefits such as new permissive access routes and community accessible spaces. The Applicant is committed to providing a Community Benefit Fund, as set out in the Planning Statement [APP-209] to allow for community benefits. The Community Benefit Fund is a commitment outside of the DCO process (it cannot be considered as part of the decision-making process).
BEPS-399	Soils and Agriculture	Chapter 15: Soils and Agricultural Land Introduction	These comments are noted but the criticisms are not accepted. Effects on soils and agricultural land are fully

ID	Theme	Representation	Applicant's Response
		BEPS objects to the applicant's assessment of soils, agricultural land and farm business effects. The application does not provide a complete, coherent or reliable baseline for all land to be affected by the scheme. It understates the significance of impacts on Best and Most Versatile (BMV) land, relies too heavily on assumptions of reversibility, defers critical survey work and mitigation detail to pre-construction, and fails to assess the whole-life effects of repeated disturbance, replacement and decommissioning on soils and agricultural land quality. The scheme is plainly a major incursion into productive agricultural land. The applicant's own assessment shows that a substantial proportion of the surveyed land, around 80% is Grade 2 and Grade 3a, and the scheme's own residual effects tables record significant adverse effects on BMV land.	assessed in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] .
BEPS-400	Soils and Agriculture	This proposal for utility scale solar on productive farmland is contrary to the March 2026 Land Use Framework, which preferentially reserves the best land for food production. On 18 Mar 2026 — The Land Use Framework for England was published by the Government setting out how it felt the UK can use its land more effectively. It restricts the use of solar developments on the Best and Most Versatile land. The DESNZ Minister Lord Whitehead speaking in the winding of the Clean Power 2030 Action	The comments are noted. NPS EN-3 recognises that, at scale, ground mounted solar developments may use some agricultural land. Paragraph 2.10.21 of NPS EN-3 provides that where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of BMV agricultural land where possible.

ID	Theme	Representation	Applicant's Response
		Plan: Rural Communities debate in the House of Lords on Wednesday 22 April 2026 said '...that is what the land use framework says on the best estimates for the land that is being taken. In addition to that, he and other noble Lords will be aware that, in the guidance and arrangements for the development of solar, there is a clear understanding that the best and most versatile land will be excluded from those solar developments and that they should go primarily on brownfield land or less-important agricultural land, so that precisely that best and most versatile land for farming and food use is preserved for that activity. That is what is happening with the solar developments coming forward at the moment.'	Paragraph 2.10.22 of NPS EN-3 confirms that the development of ground-mounted solar arrays is not prohibited on BMV agricultural land, and paragraph 2.10.23 of NPS EN-3 requires the Applicant to explain their choice of site, noting the preference for development on suitable brownfield, industrial and low and medium grade agricultural land. Factors considered in the site selection process are set out in the Site Selection Assessment [APP-215]. BMV land was considered during site selection, along with previously developed land and rooftops. 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]. 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

ID	Theme	Representation	Applicant's Response
			power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
BEPS-401	Soils and Agriculture	The Land Use Framework represents new national policy and guidance. It is generally accepted that the quantity of BMV land in England is between 39% or 42%. Considering the East Pye proposal, which the promoters' evidence shows is around 80% BMV land, exceeds the national proportion of such land by a factor of over two, and that only 3pc is unproductive, the proposal is contrary to national land use policy. Such developments should be concentrated on the poorest land, which should be exhausted before the best land is considered. At around 80% best and most versatile land, this application is now clearly contrary to national land use policy. The percentage of BMV land at East Pye is exactly double the highest estimate of national proportion of such land. On this basis, the East Pye proposal should be judged contrary to policy and refused.	The statistic of around 42% of agricultural land in England being BMV was correct at the date of the assessment. However, that figure has now been superseded by new ALC predictive mapping. The Predictive Agricultural Land Classification Map for England (Defra, 2026) has provided an estimate of the area of BMV in Norfolk, which supersedes earlier estimates. As set out in the accompanying "Final Report: Development of a Predictive ALC Map for England" (Cranfield Environment and Agrifood, July 2025) much of Norfolk has been upgraded in the estimates and most of Norfolk is now predicted BMV. We estimate that around 94% of Norfolk's agricultural land is predicted to be of BMV quality. The findings for Sites 1 – 10 and the BESS (Table 15-6 of ES Volume 1, Chapter 15 - Soils

ID	Theme	Representation	Applicant's Response
			and Agricultural Land [APP-051] are therefore in line with the revised predictive ALC map.
BEPS-402	Soils and Agriculture	The scheme affects extensive BMV land The applicant's own material shows that the scheme is dominated by BMV land. The ES Chapter 15 table identifies 397.4ha of Grade 2 land and 431.7ha of Grade 3a land, amounting to 829.1ha of surveyed BMV land. Figure 15.1 visually confirms that the principal development parcels are overwhelmingly Grade 2 and Grade 3a. This is not a marginal effect on isolated parcels of poorer-quality land. It is a large-scale development on highly productive farmland. The application therefore engages the strongest policy concerns about unnecessary permanent or semi-permanent encroachment onto BMV land. The applicant's own assessment also concedes significant harm. The chapter records a significant moderate adverse effect on BMV agricultural land during construction, and it further accepts that comparable restoration may not be achievable in all areas, especially where deep foundations are required. Site 1 at Great Moulton which is Grade 2 land will permanently be lost to agriculture, as the site of the proposed National Grid substation.	The reason for the determination of the adverse effects on agricultural land are set out in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] and relates to the permanent loss of land for the NG Substation and tree planting. Site 1 is mostly Grade 2. The installation of the substation and BESS will result in some permanent loss of Grade 2 land, as identified in ES Chapter 15 at sections 15.8.60 et seq. A worst-case scenario is the permanent loss or downgrading of 12.1 ha for the BESS and Project Substations, plus 6.1 ha for the NG Substation and pylons. The reason for siting these facilities in this location is set out in ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution' [APP-041]. Important considerations included access to roads as well as connection to the grid, as explained in Section 5.5.

ID	Theme	Representation	Applicant's Response
BEPS-403	Soils and Agriculture	The BMV calculations are inconsistent and misleading The application does not present one coherent, fully evidenced scheme-wide BMV figure. At PEIR stage, the applicant's figures were presented as 86% BMV in the surveyed area, with around 40% Grade 2 and 40% Grade 3a. The detailed PEIR ALC appendix gave 435.8ha Grade 2 and 431.7ha Grade 3a out of 1,077.6ha surveyed. In the ES, the applicant now gives 397.4ha Grade 2 and 431.7ha Grade 3a for Sites 1–10 and the BESS, totalling 829.1ha of surveyed BMV land. Yet elsewhere the ES still refers to "868ha of BMV within the Scheme." That is an obvious internal inconsistency. More fundamentally, neither the old figure nor the later ES figures can properly be used as a whole-order-limits BMV percentage, because the Cable Route Corridor ("CRC") was not surveyed at PEIR stage and remains unsurveyed in the ES baseline. The earlier PEIR ALC survey covered only about 1,078ha of the 2,232ha site and expressly excluded the CRC. The applicant's BMV percentage is therefore potentially misleading if presented as a scheme-wide figure. At most, it is a percentage of the surveyed land parcels. It is not a	The ALC for Sites 1 – 10 plus the BESS are set out in Table 15-6 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. These have identified 829 ha of BMV, with 16.4 ha not surveyed. The CRC has not been surveyed. As described in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] at 15.8.34, trenches may be up to 7m wide within a generally 25m working corridor. The land quality and soils within the CRC will be surveyed prior to commencement, as described in the Outline SRMP [APP-204] at section 3. The respondent is correct. In the economic assessment in section 15.8.128 and 15.8.129 in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], the higher figure of 868 ha of BMV is used. Accordingly, the economic impacts are slightly overstated in the ES. This

ID	Theme	Representation	Applicant's Response
		true percentage of all land within the Order Limits that may be disturbed.	figure is an error and should have been amended.
BEPS-404	Soils and Agriculture	The ALC and soil baseline remains incomplete because the CRC is unsurveyed The Outline SRMP expressly states that no soil survey has been undertaken for the CRC and that, before work commences on the CRC, a survey of soil physical characteristics and land quality will be completed. The Outline Cable Route Construction Statement says the same thing: a detailed agricultural land survey and soil survey of the CRC will be undertaken only prior to commencement of construction. That is not a minor omission. The CRC is approximately 24km long, typically 50m wide, narrowing in places to about 13m and widening in places to 405m, with open-cut working widths of 25m, trenches up to 7m wide and 2m deep, launch and reception pits up to 25m by 25m and temporary compounds up to 130m by 130m. This is a substantial linear construction project affecting agricultural land in its own right. Figure 15.1 reinforces the point visually. The main site parcels are shown with detailed grading, but the BESS/CRC area includes 'Not Surveyed' and 'Not Surveyed: Assumed BMV,' confirming that the applicant	The construction of the CRC will be controlled by a detailed SRMP, which is secured by DCO Requirement. The installation of cables is a temporary work. It will be controlled through a detailed Soil Resources and Management Plan, to be controlled by DCO requirement. Pre-entry surveys will identify the soil type and quality prior to construction. The soils will be removed in order, and replaced in order, such that post installation of the cables the same soils profile will be restored. This will ensure that land quality is not adversely affected by the temporary works. Works which are temporary and which do not result in permanent effects on agricultural land or soils are defined as of low magnitude (Table 15.4 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]), and

ID	Theme	Representation	Applicant's Response
		still does not have a complete evidence-based ALC baseline for all affected land. The applicant cannot lawfully or logically assess the significance of effects on agricultural land across the whole scheme while leaving the CRC baseline to be established later.	significance has been assessed accordingly.
BEPS-405	Soils and Agriculture	CRC soil survey is especially critical because haul roads, access and trenching are proposed across the corridor The absence of CRC survey is even more serious because the applicant now proposes substantial physical works and trafficking within the corridor. The Outline Cable Route Construction Statement confirms temporary internal haul routes, access tracks, laydown areas, spoil storage, temporary construction compounds and cable trenching within the CRC. It also provides for temporary construction access ramps for watercourse crossings, including more intrusive forms where avoidance is not practicable. The Outline SRMP confirms that topsoil stripping will be required for access tracks and that cable installation will involve open-cut excavation, stripping and reinstatement of topsoil and subsoil. Once repeated heavy trafficking, haul routes and trenching are proposed across the CRC, detailed CRC soil and ALC survey is plainly not optional. Without it, the applicant cannot show what grades of land are being crossed, cannot assess the vulnerability of those soils, and cannot	Detailed ALC and soil surveys are proposed before construction works commence, as set out in the Outline SRMP [APP-204] at section 3. A detailed SRMP will be a DCO Requirement. Cable works are temporary works and, provided that good practice is followed, the works will not result in any long-term adverse effects on soil structure, and no adverse effects on agricultural land quality. Accordingly, identification of the soils and land quality pre-construction is important, but it is not necessary to determine this for the ES, because the land quality will not be adversely affected.

ID	Theme	Representation	Applicant's Response
		demonstrate that temporary disturbance will be reversible without loss of land quality.	
BEPS-406	Soils and Agriculture	The site's clay-rich, water-sensitive soils are vulnerable to structural damage The applicant's own material establishes that the site is dominated by Beccles 1 Association soils, described as slowly permeable, seasonally waterlogged fine loamy over clayey soils, with Burlingham 1 soils in places having slowly permeable subsoils and seasonal waterlogging. The Outline SRMP accepts that wet handling and trafficking can cause damage to soil structure, compaction and smearing, and says that with clay soils especially this can be difficult to ameliorate. It repeatedly emphasises that adherence to moisture conditions for handling is 'extremely important'. The applicant seeks to reduce the apparent seriousness of this by classifying the soils as not 'high sensitivity' because local field capacity days are below 150 and wetness classes are I–III. But that formal categorisation does not remove the practical risk which the same SRMP openly acknowledges. The soils are still largely clay and heavy clay loam with only medium resilience to structural damage. The application therefore presents an internal tension: it downplays the formal sensitivity category while	Sensitivity of receptors are set out in Table 15.3 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. As described in Table 15.3 high clay soils with a FCD <150 are classified as medium sensitivity in line with the ISEP guide "A New Perspective on Land and Soil in Environmental Impact Assessment". Soil sensitivity in ES terms does not affect the Outline SRMP [APP-204]. This is because the purpose of the soil management works is to ensure that soil structures are not affected. What the original soil structure sensitivity is will be determined pre-construction and used to refine the SRMP. Any works within the CRC will be reinstated. A detailed soil survey will be conducted across the CRC once the route has been tightly defined, and preconstruction, to inform a detailed SRMP which is secured by DCO requirement.

ID	Theme	Representation	Applicant's Response
		simultaneously admitting that wet handling and trafficking on these soils can cause material damage. The fields the applicant proposes to use for the cable corridors are frequently owned by farmers not involved in the scheme, whose own agricultural operations will be impacted. Many of these do not have any agreements with East Pye Solar and are facing their land being included under Compulsory Purchase powers. It is therefore extremely important to assess and avoid areas of BMV land to prevent permanent damage to these soils which will remain in use for agriculture.	
BEPS-407	Soils and Agriculture	The applicant has not robustly analysed lasting damage from haul roads and access tracks The application does not contain a robust, quantified assessment of lasting damage to BMV land from haul roads and access tracks. The chapter and supporting documents assume that stripped and reinstated soils can be returned to their previous land quality, but provide no convincing compaction modelling, no detailed soil structure recovery assessment, and no site-specific demonstration that repeated trafficking on clay-rich land will not cause lasting degradation. The SRMP states that access-track disturbance is 'temporary, mostly long-term, spanning the lifespan of the Scheme'. That phrase is significant. A long-term disturbance lasting for the life of the scheme is not a trivial or fleeting impact. Again, frequently impacting	The potential effects of tracks have been considered in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051]. This concludes that these areas are capable of full restoration without adverse effects or loss of land of BMV quality. Temporary construction tracks for access and haul roads will be restored as part of the construction works. These areas will be subject to decompaction works as necessary and returned to agricultural use at the end of the construction phase. Tracks within the operational site for access will be restored at

ID	Theme	Representation	Applicant's Response
		farmers who do not want to participate in this scheme and need to continue to farm this land. The applicant's reliance on later management detail is not enough. It indicates only that future handling rules, monitoring and contractor sign-off will apply. That is not a substitute for a proper assessment now of whether BMV land crossed by haul roads can realistically recover.	decommissioning. These are only in areas where there has been voluntary participation in the scheme. The track material and matting will be removed, the area will be mechanically de-compacted, and stored topsoil will be spread back over the area. Cultivation will then take place to restore the land back to its original quality and profile, using the original soil.
BEPS-408	Soils and Agriculture	The methodology is structured to minimise long-duration but 'temporary' harm The applicant's methodology tends to classify temporary development as low magnitude where works are said to be reversible. A 60-year scheme on BMV heavy clay soils, with access tracks, trenching, compounds, substations and repeated operational replacement cycles, cannot be treated as if any temporary disturbance is inherently minor just because restoration is asserted. The Outline SRMP itself demonstrates why that is wrong. It applies not just to construction, but also to monitoring, maintenance, repair and replacement works during operation, and to decommissioning in principle. That confirms that soil disturbance is not limited to a one-off construction event.	Paragraph 15.5.19 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] explains that temporary effects are classed as low magnitude impacts. The ISEP guide does not distinguish between short term and long-term temporary impacts. Whilst works that are reversible are classified as temporary, any works that result in loss or downgrading of agricultural land or soils have been classified as permanent. Soils disturbed for works at construction which will be restored at decommissioning are described ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The

ID	Theme	Representation	Applicant's Response
			Outline SRMP [APP-204] sets out works for each phase of the scheme, including how soils will be managed whilst in storage.
BEPS-409	Soils and Agriculture	The scheme entails repeated whole-life disturbance, not one-off construction effects The application understates the frequency and duration of soil disturbance. The Outline SRMP assumes an operational life of 40 years for solar panels and states that all solar panels will be replaced once during the operational phase, taking a maximum of 24 months. It also anticipates ad hoc replacement works and recognises that rutting may need rectification later. The decommissioning material confirms that access tracks and decommissioning traffic will again traverse the site and that some or all construction and operational access will be used again at the end of the project. So, the true position is not construction once, then undisturbed operation, then decommissioning once. It is repeated whole-life disturbance: construction, operational replacement, maintenance and repairs, then decommissioning. That significantly weakens any simple assertion that track and corridor effects are 'temporary and reversible'.	The Outline SRMP [APP-204] sets out that a detailed SRMP will be completed to incorporate decommissioning measures. The Outline SRMP [APP-204] states any damage caused during the construction and operational phase will be rectified in the following dry period.
BEPS-410	Soils and Agriculture	The applicant's case on reversibility is inconsistent with emerging empirical evidence	NPS EN3 2025 sets out that solar farms have the potential to increase

ID	Theme	Representation	Applicant's Response
		Published UK evidence now materially undermines the applicant's optimistic assumptions on reversibility. The Lancaster University paper on plant and soil responses to ground-mounted solar panels in temperate agricultural systems (https://iopscience.iop.org/article/10.1088/1748-9326/ada45b) sampled 32 solar farms in England and Wales and found that, compared with gaps and control pasture, land under solar panels had significantly lower plant cover and aboveground biomass, 14.4% to 15.5% higher soil compaction, 9% lower soil organic carbon than gaps, and 29.1% lower particulate organic matter than gaps. The paper concludes that reduced plant productivity and microclimatic change beneath panels can affect soil carbon storage, nutrient cycling and soil structure, and that solar farms require active management and continued monitoring if ecosystem services are to be maintained. That evidence is directly relevant here. It shows that solar occupation itself, not merely poor handling during construction, can have measurable adverse consequences for soils and vegetation. The applicant's repeated reliance on assumed reversibility is therefore not supported by the emerging evidence base. The key finding from the Welsh Government evidence (https://www.gov.wales/sites/default/files/publications/2022-08/best-and-most-versatile-agricultural-land-and-solar-pv-arrays.pdf) is that damage to BMV land from solar is not	biodiversity values of sites which can result in significant wider environmental benefits and enchantments. EN3 further recognises that solar can be easily decommissioned. As set out in the Outline SRMP [APP-204] a detailed SRMP will be completed to incorporate decommissioning measures, which will be controlled through a DCO requirement. The Lancaster University paper compares land under panels to permanent pasture; there is no consideration given to arable land. Soils, in respect of carbon levels within the soil, will benefit from being in long term grassland compared to arable. It is not clear from the research paper whether different height panels were included in the research, many older panel designs are very low to the ground at the lower edge leading to significant areas of shading. The Welsh Governments findings set out that solar sites are reversible and soil management plans mitigate the risk of damages to soils. A detailed

ID	Theme	Representation	Applicant's Response
		limited to permanent built footprints, but can arise from the way soil is handled, trafficked and restored. The research states that the main risk is deep soil compaction from construction traffic, access roads, cabling and associated works, which can reduce the versatility of BMV land, impair drainage and root function, and in some cases leave impacts that persist for many years or may be permanent. It also identifies residual compaction at decommissioning, uncertainty around pile extraction and subsoil disturbance, and the risk that soils cannot simply be assumed to return to their former quality after long periods under solar infrastructure. On the basis of this evidence, the Welsh Government's policy position is that Grades 1, 2 and 3a land should be strongly protected and that, where BMV land is proposed for solar PV, permission should generally be refused unless other significant material considerations clearly outweigh the need to protect it.	SRMP will be completed to incorporate handling techniques, soil suitability tests and decommissioning measures. Planning Policy Wales is not a material consideration for the development as the development is located within Norfolk. Nevertheless, PPW does not place a bar on the development of BMV land only that development should be directed to land of poorer quality if poorer quality land is available. In Norfolk the Predictive Agricultural Land Classification Map for England, published since the ES was published, shows that most of Norfolk to be predicted to be of BMV quality.
BEPS-411	Soils and Agriculture	The application does not properly address damage from storm events or damaged infrastructure The soils assessment does not appear to include any adequate consideration of soil impacts arising from damaged panels, damaged supports or storm-related infrastructure failure. That is a material omission. If infrastructure is damaged in extreme weather, the consequences for soils may include additional trafficking, emergency access, localised compaction, rutting,	Effects on soils from damaged infrastructure will be included within the detailed SRMP which is secured by DCO Requirement.

ID	Theme	Representation	Applicant's Response
		contamination, exposure of bare ground, damage to vegetation cover and repeated disturbance during repair or replacement. The soils chapter should have assessed this as part of a future-ready whole-life soil risk assessment. Instead, the application largely assumes orderly management in ideal conditions. That omission is more serious given increasing climate volatility and the application's own reliance on ideal dry-condition handling windows.	
BEPS-412	Soils and Agriculture	The scheme cannot properly be described as temporary in land-use terms The applicant relies heavily on the claim that the use of land for solar is temporary. But the documents do not secure a true return to agricultural use. The Outline DEMP says that, after decommissioning, the landowners would choose how the land is to be used and managed, that some habitat, biodiversity mitigation and enhancement areas may remain in situ, and that the majority of the sites would be returned to their original use. That is not an enforceable whole-site commitment to restore all land to agriculture. The same decommissioning material also allows that some below-ground infrastructure, especially cables, may be left in situ depending on policy and practice at the time. A development cannot properly describe itself as a temporary use of agricultural land where, at the end of the project,	The Draft DCO [AS-032] secures a Requirement for decommissioning and restoration to ensure that the Scheme, apart from the National Grid Substation and the Grid Connection Infrastructure which will remain in-situ, is decommissioned at the end of the 60-year operational lifetime. As set out in the Outline DEMP [APP-198], the National Grid Substation and the Grid Connection Infrastructure would remain in situ. The management of all planting for the National Grid Substation will be the responsibility of National Grid Electricity Transmission, and this will remain in place post decommissioning of the

ID	Theme	Representation	Applicant's Response
		future land use is left to private choice, some habitats may remain, some infrastructure may remain, and restoration is promised only 'as far as practicable'. At most the application shows that infrastructure may later be removed. It does not show a secured return of the whole scheme to agricultural use or to its former ALC status.	Scheme as it will form part of the transmission network. With the exception of the National Grid Substation and Grid Connection Infrastructure, the soil and land conditions will be returned to its original use and condition as far as practicable. In accordance with Requirement 18 of the Draft DCO [AS-032], a detailed SRMP will be submitted to and approved by the relevant planning authority.
BEPS-413	Soils and Agriculture	There is no secure guarantee of restoration to former agricultural land quality The Outline SRMP qualifies restoration in several important respects. It says the applicant commits to restoring temporary compounds, tracks and conversion units, but also says that the BESS and Project Substations may not be capable of restoration to comparable ALC grade where deep foundations are required, that the National Grid substation land will not be restored, and that woodland areas will be permanent. The decommissioning section says a detailed SMP will only be produced later and that the Order Limits will be returned to original use and condition only 'as far as	The Applicant refers to its response to BEPS-411.

ID	Theme	Representation	Applicant's Response
		practicable'. Those caveats show that the applicant's restoration case is conditional and partial, not absolute.	
BEPS-414	Soils and Agriculture	The BNG and decommissioning position is incoherent The decommissioning material also exposes a contradiction between biodiversity gain and agricultural restoration. The Outline DEMP says some habitat, biodiversity mitigation and enhancement areas may be left in situ after decommissioning, while most infrastructure is to be removed and the majority of the sites returned to original use. But it does not identify which habitats will be retained, what proportion of claimed biodiversity units survive the end of the scheme, or how those habitats would be protected from decommissioning activities such as excavation, backfilling, soil reprofiling and reseeded. That matters for Chapter 15 because it further undermines the claim of temporary agricultural loss. If biodiversity areas remain, then land is not fully returning to its former agricultural condition. If land is fully restored to agriculture, then some claimed ecological gains may not endure. The application does not resolve that contradiction. Where ecological harms are incurred in building a project and biodiversity net gain must be demonstrated, this is not a genuine biodiversity improvement if it is only temporary.	As set out in the Outline DEMP [APP-198], the National Grid Substation and the Grid Connection Infrastructure would remain in situ. The management of all planting for the National Grid Substation will be the responsibility of National Grid Electricity Transmission, and this will remain in place post decommissioning of the Scheme. There is no policy dictating how agricultural land must be used. Agricultural land is brought out of production for a number of reasons. The area on farms in Norfolk is about 417,633ha (Table 15.9 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]). Currently over 41,000ha of arable land (10.8% of agricultural land and 15.1% of all arable land) is not being cropped. Green infrastructure will not generally affect land quality or soils. Areas of new woodland are proposed which will

ID	Theme	Representation	Applicant's Response
			change the land use from agriculture but will not affect the soil resource.
BEPS-415	Soils and Agriculture	There is no identified decommissioning bond or insolvency-proof financial security The application describes decommissioning works but does not identify any secured decommissioning bond, escrow, letter of credit, parent company guarantee or other ring-fenced financial provision. The decommissioning and soil management documents describe what might happen environmentally, but do not explain who will pay for it, how funds will be secured, or what happens if the project company becomes insolvent. That omission matters directly to the soils and agricultural land objection, because restoration and reversibility are only meaningful if the money to achieve them is genuinely secured. Without insolvency-proof financial security, restoration is not merely uncertain in theory; it is financially contingent.	The Applicant confirms that, if consent is granted, they have the capability to build, own and operate the Scheme. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker will be bound by the legally enforceable requirements of the DCO. The Draft DCO [AS-032] secures a Requirement for decommissioning and restoration to ensure that the Scheme is decommissioned at the end of the 60-year operational lifetime. Failure to comply with a DCO requirement is a criminal offence.
BEPS-416	Soils and Agriculture	The farm business assessment is incomplete and understated The farm reports are plainly limited. Appendix 15.2 expressly states that it reports on farms within the Order Limits excluding the Cable Route Corridor. That means the	The ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051] includes a detailed assessment of the cropping and stocking across the Site, and the effects of the Scheme on both the individual farms and the wider land-based rural economy. In terms of the effects on farm businesses from the

ID	Theme	Representation	Applicant's Response
		application does not present a whole-scheme assessment of farm business effects. That omission is material because the CRC is itself a substantial works corridor involving trenching, haul routes, compounds, spoil handling and reinstatement across active farmland. Excluding it from the farm business appendix necessarily understates the effects on holdings. Often farmers whose land is part of the CRC don't want to be involved in the project, will have to continue agricultural operations around this project, and will still need to farm their land in the cable corridor. The reports also show that several businesses would lose substantial proportions of the land they utilise: around 35% for Business 3 and Business 6, around 26% for Business 4 and Business 8, and 18% for Business 5. Those are not trivial losses. Moreover, these are not simple monoculture units. The appendix records mixed operations including arable production, grazing, poultry, environmental schemes, under-field drainage, manure applications, local grazing arrangements and diversified income streams such as shoots, self-storage, fishing lakes and livery uses. That means the effect of land-take is on complex business systems, not simply on hectare totals.	cable route construction, there will be short-term disruptions which will be subject to compensation. The Applicant is engaging with affected landowners along the CRC and seeking to enter into voluntary agreements.

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BEPS-417	Soils and Agriculture	The compulsory acquisition consequences for farm businesses are not properly assessed The application does not seriously grapple with the consequences if compulsory acquisition of freehold land is exercised. If farmland is permanently taken, the affected business does not continue unchanged. It must reorganise around remaining land, secure replacement land, alter its enterprise structure, reduce scale or potentially cease some operations. Compensation may exist in principle, but compensation is not the same as preserving a viable business. That point is especially important where the applicant's own appendix shows substantial proportions of utilised land would be affected for several businesses, yet the application offers only short descriptive summaries and excludes CRC effects from the farm assessment. The Secretary of State cannot assume that compensation rights cure the planning harm to agricultural businesses.	The Applicant notes the concerns raised in respect of impact to farming businesses. As set out in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], the effects of the Scheme on agricultural land and farming operations have been assessed. In relation to the cable route corridor, the land required for cable installation is temporary in nature and the land will be reinstated. Following installation, the cable trenches would be backfilled, soils reinstated in accordance with the Outline SRMP [APP-204], and agricultural use of the land would resume. The Applicant is not seeking to permanently acquire freehold agricultural land either through voluntary agreements or under compulsory acquisition powers for the cable route. Rather, following construction, permanent rights would be secured through easements to protect and maintain the buried cables while allowing continued agricultural

ID	Theme	Representation	Applicant's Response
			use of the land. Accordingly, the land would not be permanently removed from agricultural production. During construction there would be temporary disruption to farming activities within the cable route corridor. However, the working width is typically 50m and construction methodology has been developed, where reasonably practicable, to maintain access to land on both sides of the corridor, thereby reducing temporary severance effects and enabling farming activities to continue. The Applicant will engage with affected landowners and occupiers regarding access arrangements, the provision of crossing points where necessary, and detailed construction planning to reduce disruption to farming activities in advance of construction works. Any temporary farming business losses as a result of the works or disruption experienced by affected landowners would be addressed through the voluntary agreement or the statutory compensation framework.

ID	Theme	Representation	Applicant's Response
			Given the temporary nature of construction effects, the reinstatement of agricultural land following cable installation, and the retention of agricultural use thereafter, the Applicant does not consider that the onshore cable route would result in significant adverse effects on the viability of farm businesses or require permanent restructuring.
BEPS-418	Soils and Agriculture	The application does not comply in substance with ISEP best practice Although the applicant says Chapter 15 has been checked against ISEP guidance, the application does not comply with that guidance in substance. The ISEP approach expects full survey coverage of agricultural land that may be disturbed, robust treatment of options appraisal and poorer-quality-land preference, and a more evidence-based approach to reversibility and post-decommissioning soil condition. The East Pye material still leaves the CRC unsurveyed, still relies heavily on assumed reversibility, and does not provide a fixed or independently audited end-state for agricultural land quality. The applicant therefore appears to invoke ISEP while failing to meet its central practical implications.	The ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] has followed the ISEP Guide, with departures noted and explained. The ALC results for all areas except the CRC are set out in the ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051]. The ALC of the CRC is not determined, as this corridor will not be affected except for short-term construction impacts. A detailed soil survey will be carried out across the CRC before construction. The site selection process is described in ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [APP-041]. Agricultural land

ID	Theme	Representation	Applicant's Response
			quality was an important consideration for the siting of items of fixed equipment where land quality is to be disturbed for the long-term or permanently, as described. Areas to be restored, including those within the CRC, have been fully assessed. It has been concluded that these areas can be fully restored to comparable land quality, even after 60 years, so long as the topsoils (and in a few cases small amounts of subsoil) have been retained and stored, and can be used in the restoration. This will all be covered in detail, including for the CRC, in the SRMP which will be controlled by DCO Requirement.
BEPS-419	Soils and Agriculture	Current Government land-use evidence supports protection of BMV land The 2026 Land Use Framework for England states that Government will safeguard best and most versatile farmland from permanent land use change such as woodland creation and urban expansion, and that updated Agricultural Land Classification data and mapping will be published to strengthen assessment and decision-making. It also states that projected land use change for	The Land Use Framework needs to be read in the context of the National Policy Statements for Energy and acknowledges the use of agricultural land, including BMV land, for solar.

ID	Theme	Representation	Applicant's Response
		development, renewables and habitat restoration should avoid the most productive BMV land in the analysis. That reinforces the basic objection that East Pye's incomplete baseline and extensive use of BMV land are incompatible with government policy.	
BEPS-420	Soils and Agriculture	Conclusion The applicant has not demonstrated that this BMV-heavy, clay-rich scheme can be constructed, operated, maintained, repowered and decommissioned without lasting harm to soil structure, agricultural land quality and farm businesses. The application is defective because: • it uses inconsistent and potentially misleading BMV figures; • it still lacks a complete CRC ALC and soil baseline; • it proposes haul routes, trenching and substantial works across unsurveyed corridor land; • it understates the significance of impacts on heavy clay and seasonally wet soils; • it relies excessively on assumptions of reversibility; • it fails to assess the whole-life effects of recurring disturbance and replacement;	The use of land of BMV quality for solar is not prohibited. The Applicant has sought to reduce the amount of BMV land within the Scheme as far as practicable considering the high proportion of BMV land in Norfolk. 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. A detailed soil survey and ALC survey will be carried out over the CRC as explained in ES Chapter 15. The detailed ALC survey, reported in ES Volume 3, Appendix 15.1 – Agricultural Land Classification Survey [APP-181], confirms that BMV quality land within the Sites amounts to 829.1 ha.

ID	Theme	Representation	Applicant's Response
		- it does not secure a true return of the land to agriculture; - it presents an incomplete farm business assessment excluding the CRC; - and it offers no clearly identified insolvency-proof financial security for decommissioning and restoration. Taken together, those defects mean the Secretary of State does not presently have a sound basis for concluding that soils, BMV land and farm businesses will be adequately protected.	The ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] includes a detailed assessment of the cropping and stocking across the Site, and the effects of the Scheme on both the individual farms and the wider land-based rural economy. In terms of the effects on farm businesses from the cable route construction, there will be short-term disruptions which will be subject to compensation. The Outline SRMP [APP-204] sets out that a detailed SMP will be completed to incorporate decommissioning measures which is secured through a DCO requirement.
BEPS-421	Soils and Agriculture	Remedies sought The Examining Authority and Secretary of State are respectfully requested to require, before any recommendation or decision that the scheme is acceptable on soils and agricultural land grounds: A complete, detailed ALC and soil survey of the entire Cable Route Corridor and all other land to be disturbed, including haul routes, temporary access, compounds, laydown areas and crossing locations.	The Applicant refers to its response to BEPS-420.

ID	Theme	Representation	Applicant's Response
		• A corrected, consistent and transparent scheme-wide BMV calculation, clearly distinguishing surveyed land, unsurveyed land and any assumed categories, with withdrawal of any misleading percentage claims. • A revised Chapter 15 assessment that re-evaluates significance in light of the complete CRC baseline and the actual whole-life disturbance regime, including construction, maintenance, repair, replacement, repowering and decommissioning. • A specific assessment of lasting damage to BMV land from haul roads, repeated trafficking, trenching, launch/reception pits, storm damage repairs and infrastructure failure. • A proper whole-scheme farm business assessment, including the CRC, compulsory acquisition consequences, functional disruption, drainage impacts, stewardship impacts, and realistic viability effects on each affected holding. • A revised assessment of reversibility that is evidence-based and reflects published empirical evidence on solar's effects on soils and vegetation, rather than assumption-led restoration claims. • A secured and enforceable restoration strategy for all agricultural land, including a fixed post-decommissioning land-use outcome, clear treatment of	

ID	Theme	Representation	Applicant's Response
		BNG retention versus agricultural restoration, and independent soil auditing against the original baseline. An indexed, insolvency-proof decommissioning and restoration financial security mechanism, such as a bond, escrow or equivalent secured provision, enforceable for the life of the scheme. If those matters cannot be satisfactorily resolved, then the Secretary of State should conclude that the application fails to provide an adequate baseline or a robust demonstration that the effects on soils, BMV land and agricultural businesses are acceptable, and development consent should be refused.	
BEPS-422	Ground Conditions	Chapter 16: Ground Conditions, Contamination, Hydrogeology and Mineral Sterilisation Introduction This Relevant Representation concerns the inadequacy of the Applicant's assessment of ground conditions, contamination, hydrogeological risk, private water supplies and mineral sterilisation for the East Pye Solar project. It should be read with ES Chapter 16, Appendix 16.1 Phase 1 Ground Conditions Assessment, Appendix 16.2 Minerals Resource Assessment Desk Study, and Figures 16.1 to 16.4. BEPS's central objection is that the Applicant has presented a narrow, desk-based contamination screening exercise as though it were a robust and complete	The Applicant refers to its response to BEPS-422 to BEPS-430. The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed through ES Volume 3, Appendix 2.2 – EIA Scoping Opinion [APP-114].

ID	Theme	Representation	Applicant's Response
		assessment of the likely significant effects of the Scheme on soils, groundwater, private water supplies and geologically sensitive receptors. In reality, the ES depends on constrained source-search buffers, incomplete and assumed private water supply data, sparse historical borehole control, broad assertions about the protective function of Diamicton, and extensive post-consent investigation and refinement. That is not a sufficient evidential basis on which to conclude that no significant effects would arise.	
BEPS-423	Ground Conditions	The assessment is methodologically too narrow The Applicant's methodology materially narrows the baseline before the analysis even begins. Both Chapter 16 and Appendix 16.1 adopt a study area for potentially contaminative land uses of only up to 250 m from the Order Limits, describing that as 'robust yet proportionate.' That approach is unsound for a project spread across a large and hydrogeologically sensitive rural landscape with former RAF airfields, landfills, chalk and Crag aquifers, multiple watercourse catchments and numerous private water supplies. A rigid 250 m source-search buffer may be convenient for screening, but it is not a substitute for a site-specific conceptual model based on actual contaminant pathways. The narrowness of the methodology is compounded by the treatment of private water supplies. The Applicant uses a 1 km search area only for the BESS and substations, and	The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. The 250m Study Area for the identification of potentially contaminative land uses presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] is based on professional judgement, knowledge of similar projects and the DMRB LA 109 and DMRB LA 113. Although not directly relevant to the Scheme, the Study Area accords with the Study Area recommended in Guidance for the Safe Development of Housing on Land Affected by Contamination. It is

ID	Theme	Representation	Applicant's Response
		only 250 m for PV arrays and cable routes, on the basis that PV arrays and cables are said to be unlikely to affect water quality. That assumption is one of the matters in dispute. It cannot simply be assumed where the works include trenching, piling, HDD, hard infrastructure, imported materials, and disturbance in a chalk-and-private-water-supply setting. From personal experience, any disturbance of our heavy clay soil in wet weather – even heavy rainfall – has an impact on water turbulence in hand-dug wells and produces sediment of very fine clay particles which blocks filters, contaminates drinking water and causes Orange staining on domestic sanitary ware. Heavy construction traffic on and across fields will without doubt have an impact on local wells and private drinking water supplies. Mobilising other historic contaminants in the soil through work below the plough line is extremely risky in our hydrologically extremely sensitive and highly connected environment. There is also a high risk that any contaminants will find their way into the Waveney and Tas chalk streams.	noted that neither the Environment Agency nor South Norfolk Council have raised concerns with the extent of the Study Area. The identification of Sources of Potential Contamination (SPCs) is one stage of the formulation of a Conceptual Site Model (CSM). The CSM, including the pathways and receptors, is described in the Preliminary Risk Assessment presented the Phase 1 Ground Conditions Assessment. It is noted that the identification of off-Site Sources of Potential Contamination is undertaken to identify potential hazards to on-Site receptors, e.g., off-Site landfills where landfill gases or landfill leachate could migrate onto the Site. The assessment of the risks and impacts that contamination originating from off-Site sources presents to off-Site hydrogeologically sensitive receptors including the chalk and Crag aquifers, multiple watercourse catchments and numerous private water supplies, is

ID	Theme	Representation	Applicant's Response
			outside of the scope of our assessment. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). 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 (secured by DCO Requirement 13). The Outline CEMP [APP-196] also requires that the Applicant undertake Hydrogeological Risk Assessment for trenchless crossings wherever these interact with Principal or Secondary A aquifers or pass beneath surface

ID	Theme	Representation	Applicant's Response
			watercourses or sensitive ecological receptors.
BEPS-424	Ground Conditions	Former RAF Tibenham has been excluded rather than assessed A major flaw in the contamination baseline is the exclusion of former RAF Tibenham. In response to consultation representations specifically raising contamination and PFAS risks associated with the three former RAF airbases at Tibenham, Seething and Hardwick, the Applicant stated that RAF Tibenham 'has not been considered within this Chapter as it is approximately 1.4km off-site to the west'. That is not a hydrogeological justification. It is merely a distance-based exclusion that follows from the Applicant's own constrained source-screening methodology. Figure 16.3 confirms that no source of potential contamination is mapped at all in the Site 1–2 / BESS / Great Moulton cluster. The absence of a mapped source in that western cluster therefore reflects methodological exclusion, not proof that no contamination risk exists. This is particularly important because the western cluster includes the BESS, the proposed National Grid substation and associated infrastructure in an area where the Applicant also accepts there are nearby private water supplies and chalk-linked abstractions. It is irrational to treat that area as hydrogeologically sensitive for receptor	The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. RAF Tibenham remains excluded as it is 1.4km off-Site and as such is considered highly unlikely to impact the Scheme. Were there to be contamination originating from the airfield that was migrating within the groundwater beneath the Site then this would be the baseline condition and would not be something that the Applicant would be required to mitigate. As described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052], the effects scoped into the assessment, as agreed with regulators following scoping, are limited in relation to contamination, to exposure of receptors (including hydrogeologically sensitive receptors such as aquifers and abstractions) to

ID	Theme	Representation	Applicant's Response
		purposes but contamination-free for source purposes merely because a former RAF airfield lies beyond an arbitrary source-search radius.	existing contamination in the ground, that has been mobilised as a result of ground disturbance during the construction, operation and maintenance, and decommissioning phases. The absence of identified sources of contamination within the “<i>Site 1–2 / BESS / Great Moulton cluster</i>” is a reflection of the land-use history in that area. As described in the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184], following a review of the baseline data, SPCs have not been identified. This is not unexpected for an area with a longstanding history of agricultural use. The risks that RAF Tibenham (and all off-Site SPCs) may present to off-Site receptors, e.g., groundwater, or private water supplies, are outside of the scope of this assessment.
BEPS-425	Ground Conditions	The baseline identifies former RAF Hardwick and RAF Seething, but then understates their significance The Applicant's own Appendix 16.1 identifies former RAF Hardwick and former RAF Seething as sources of potential contamination. Table 5.1 records Hardwick as including	The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping.

ID	Theme	Representation	Applicant's Response
		runways, aircraft hardstands, ammunition and bomb stores and perimeter road, with contaminants of concern including petroleum hydrocarbons, de-icers, metals, asbestos and PFAS, together with a limited localised potential for radiological hazards associated with ad hoc aircraft disposal. It records the same broad contaminant profile for RAF Seething. Those are not trivial or benign historic land uses. They include precisely the kinds of activities and legacy materials that can create uncertainty over historic contamination, particularly where demolition, dispersal, infilling and long-term agricultural ploughing have occurred. Yet the Applicant then classifies both Hardwick and Seething only as 'Low' hazard sources in Table 5.1 and uses that classification to support a benign overall outcome. That approach materially understates the uncertainty associated with former military airfields and gives insufficient weight to the possibility of retained contamination, PFAS, unexploded ordnance related hazards, and historic munitions or fuel-related disturbance. Recent research has shown that airfields are sources of significant PFAS contamination which impacts local soils and private water supplies. (https://www.bbc.co.uk/news/world-europe-jersey-66361242). The concern is strengthened by the scoping and consultation history. Previous representations had	As described in Tables 5.3 and 5.5 of the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184], the classification of Low has been adopted as <i>"Any 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 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"</i>. This is consistent with Annex 1 of the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] where a hazard classification of "Low" is defined as representative of a scenario where <i>"locally slightly elevated concentrations"</i> of contamination may be encountered. It is recognised that PFAS contamination is commonly associated with airfields due to firefighting (use and training). PFAS-containing

ID	Theme	Representation	Applicant's Response
		expressly asked for risk assessment of PFAS contamination on and adjacent to the three former RAF airbases and for liability and remediation issues associated with disturbing historic contamination. The ES does not answer those concerns adequately.	aqueous film forming foams (AFFF) firefighting foams (termed fluorosurfactants) have been used for the extinguishment of flammable liquid fires since 1962. By 1946, RAF Seething had closed and the majority of the airfield reverted to agricultural use. In 1962, RAF Hardwick closed, and the main airfield buildings and hangars were demolished. Some of the smaller buildings remain extant and are used by commercial businesses'. Whilst PFAS hazards associated with the historical airfields have not been eliminated, given that the airfields were either no longer in use, or were demolished before the introduction of PFAS-containing AFFFs, PFAS hazards associated with the airfields are considered unlikely. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. The Outline CEMP [APP-196] includes ground investigation as a mitigation measure, with the detailed

ID	Theme	Representation	Applicant's Response
			design of the scheme to be informed by the results of the ground investigation. The results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA).
BEPS-426	Ground Conditions	The Applicant's reasoning on private water supplies is assumption-heavy and unsatisfactory The Applicant states in Chapter 16 that, within the 1 km study area around the BESS, National Grid substation and project substations, 29 private water supplies or permitted abstractions were identified, 19 of which are potentially still active, and that none of those are located within 1 km of an SPC within the Order Limits from which contamination could be mobilised by the Scheme. It therefore concludes that risks to those supplies from mobilisation of existing contamination have not been identified. Appendix 16.1 then states that all known abstractions and potentially active PWS within that 1 km study area 'appear to (or on the basis of the available geological evidence are assumed to) draw water from the chalk at depth beneath the overlying Diamicton'. That conclusion is unsatisfactory for several reasons. First, the Applicant's own note confirms that the local authority's private water well records did not include depth of wells or boreholes, borehole construction details, or the strata from which water was abstracted. The model is therefore built	The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. The assessment of risks to abstractions (including Private Water Supplies (PWS)) has been undertaken on the basis of the available information. Where the information provided was incomplete, assumptions relating to the depth of wells or boreholes, borehole construction details, or the strata from which water was abstracted assessment has been undertaken have necessarily been made. Nonetheless, for a potential hazard to be present, a Source of Potential Contamination (SPC) must be present

ID	Theme	Representation	Applicant's Response
		partly on inferred or assumed source strata rather than demonstrated receptor-specific evidence. The reality is that many local private water supplies are historical hand-dug wells, not modern deep boreholes.	and a pathway must exist between the source and the receptor. The vast majority of the assessed abstractions are not within 250m (for lower ground disturbance activities such as PV arrays) or 1km (for structures requiring piled foundations) of an SPC. For the 3No. abstractions where this is not the case, the geology of the area in which they are located is such that a pathway between the near surface soils and the chalk from which the abstractions are assumed to abstract is not present. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier

ID	Theme	Representation	Applicant's Response
			2 Generic Quantitative Risk Assessment (GQRA).
BEPS-427	Ground Conditions	Second, the Applicant's conclusion is framed negatively rather than positively proved. It says, in effect, that because none of the identified active supplies fall within the selected source distance of an on-site SPC capable of mobilisation, no risk has been identified. That is a logical consequence of the Applicant's narrow source list and source-search radius, not a robust demonstration that there are no pathway risks to the aquifer or to named local supplies. Third, the Applicant makes no meaningful distinction between the different vulnerability of wells and boreholes. The data for the private water supplies is aggregated and partly duplicated across BGS water wells, EA abstractions and local authority records. It is not a genuinely receptor-specific hydrogeological assessment. No actual surveys of wells or boreholes by East Pye Solar has taken place. Fourth, the practical result is plainly counter-intuitive. There are multiple private water supplies surrounding areas such as Site 3, Site 5, Site 10 and the Site 1 / Tibenham vicinity, yet the Applicant still concludes that no credible risk has been identified. That conclusion lacks credibility where it is based on assumptions and omissions rather than on a full pathway analysis.	The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. The groundwater abstractions identified (including private water supplies) within the Study Area are presented in tables 3.10 and 3.11 of the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] and ES Volume 2, Figure 16.5 Locations of Private Water Supplies [APP-109], as shown by in information provided by the Environment Agency, British Geological Survey and South Norfolk Council. The Study Area for the identification of potentially contaminative land uses outside of the Order Limits is not relevant to the assessment of risks to Private Water Supplies (PWS) from construction and operation of the Scheme within the Order Limits. The assessment of the risks to PWS from

ID	Theme	Representation	Applicant's Response
			Sources of Potential Contamination (SPCs) outside of the Order Limits are outside of the scope of this assessment. The identification of SPCs within the Order Limits is considered to be robust. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). As described in ES Volume 1, Chapter 16 Ground Conditions [APP-052] “As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will

ID	Theme	Representation	Applicant's Response
			<i>include a requirement for ground investigation to be undertaken post-consent".</i>
BEPS-428	Ground Conditions	The 'Diamicton protection' case is over-generalised and not robustly evidenced The Applicant relies heavily on the proposition that the superficial Diamicton provides a low-permeability barrier that prevents contaminants reaching underlying chalk and Crag aquifers. Appendix 16.1 goes so far as to say that for PV array foundations and cable trenches it is 'highly unlikely' that works to approximately 2 m to 4 m depth would create a preferential pathway through the low-permeability Diamicton and into the deeper chalk aquifer. That conclusion is overstated. Figure 16.1 shows that the superficial geology across the Order Limits is not uniformly low-permeability clay. Although Lowestoft Formation Diamicton is widespread, extensive areas of alluvium, head, peat, river terrace deposits and Leet Hill Sand and Gravel occur in the central valley and watercourse corridors. Appendix 16.2 confirms that these deposits include alluvium, river terrace deposits, Leet Hill Sand and Gravel and Lowestoft sand and gravel in parts of 4A, 4B, 5A, 5B, 7A, 7B, 7C, CRC6, CRC7 and CRC8. Figure 16.2 confirms that large parts of the Order Limits are underlain by Principal Aquifer bedrock, namely chalk and Crag Group sand. Appendix 16.1 also expressly classifies	The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. Whilst the variable nature of Diamicton is recognised, it remains a predominantly cohesive stratum and whilst more granular and water-bearing layers/lenses may be present, these are unlikely to be laterally and vertically extensive. The variable extent and thickness of the Diamicton has also been recognised, and the assessment approach has taken into account consultation with the Environment Agency in this regard. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. The Outline CEMP [APP-

ID	Theme	Representation	Applicant's Response
		the Norwich Crag Formation and the Chalk as Principal Aquifers, and the alluvium, river terrace deposits, Lowestoft sand and gravel and Leet Hill Sand and Gravel Member as Secondary A Aquifers. Figure 16.4 then shows that Diamicton thickness is not a continuous proven site-wide model but a sparse, localised set of approximate borehole-derived values. Some values in the western cluster are relatively substantial, but central and eastern areas show lower and more variable thicknesses. The map is therefore as much a picture of uncertainty as of protection. In those circumstances, the Applicant has not robustly demonstrated that the Scheme is underlain by a single, continuous, reliably protective clay layer. The figures and appendices show a heterogeneous superficial cover over Principal Aquifer bedrock, not a simple impermeable blanket. The Applicant accepts in principle that piled foundations can affect groundwater quality through turbidity or concrete bleed waters and accepts that in some locations piled foundations could penetrate the low-permeability Diamicton and create a preferential pathway into underlying granular strata. It also accepts that in areas such as the central valley system shallow groundwater may be present or upwelling through more granular deposits. However, instead of resolving those issues through parcel-specific intrusive investigation and hydrogeological assessment before consent, the Applicant repeatedly	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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). As described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] <i>"As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent"</i>. The Applicant's position remains that the assessments presented in Chapter 16 - Ground Conditions [APP-052] and the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] have been carried out robustly, and in accordance with the methodology agreed following scoping. The post-consent ground

ID	Theme	Representation	Applicant's Response
		postpones the necessary work. Chapter 16 states that detailed design will be informed by ground investigation and subsequent assessment to be undertaken post-consent, and even suggests that non-penetrative foundations could be used if conditions require them. Appendix 16.2 likewise postpones ground investigation to post-consent to assess likely excess mineral volumes. That is not good enough. Where a 60-year NSIP is proposed in a setting with Principal Aquifers, heterogeneous superficial deposits, former military contamination sources, and numerous private water supplies, the key question is whether significant effects can be ruled out now, not whether the design can be adjusted later if intrusive investigation reveals problems.	investigation and interpretative assessment will refine the CSM, and where found to be necessary, remediation / mitigation measures would be specified and undertaken. Furthermore, 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, this will ensure that pathways for contamination to migrate will not be created as a result of the construction of the Scheme.
BEPS-429	Ground Conditions	Site 3 and Site 10 sit in legacy contamination clusters, not isolated benign farmland Figure 16.3 is shows only eight mapped sources of potential contamination across the whole project: former RAF Hardwick, former RAF Seething, Market Lane Pit, former refuse tip, landfill off west side of Shelton Airfield Disused, sewage works, landfill off B1135, and a vehicle servicing and repair garage. The map confirms that Site 3 is associated not only with former RAF Hardwick but also lies close to the off-site	The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. The 250m Study Area for the identification of potentially contaminative land uses presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] is based on professional judgement, knowledge of

ID	Theme	Representation	Applicant's Response
		landfill 'Off West Side of Shelton Airfield Disused'. It confirms the central corridor contains the sewage works and landfill sources. It confirms the eastern cluster is dominated by former RAF Seething. And it confirms the western Site 1–2 / BESS cluster has no mapped source at all, despite the proximity of RAF Tibenham. The map therefore supports two criticisms. First, Site 3 and Site 10 are not simple 'agricultural' baselines but part of clusters of legacy land uses. Second, the contamination baseline is highly selective and dependent on source-screening choices.	similar projects and the DMRB LA 109 and DMRB LA 113. Although not directly relevant to the Scheme, the Study Area accords with the Study Area recommended in Guidance for the Safe Development of Housing on Land Affected by Contamination. The presence of Sources of Potential Contamination (SPCs) within Sites 3 and 10 is recognised within both ES Volume 1, Chapter 16 - Ground Conditions [APP-052] and ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184], with the Phase 1 Ground Conditions Assessment [APP-184] presenting land contamination risk assessments for SPC1 – Former RAF Hardwick (Site 3), SPC2 – Former RAF Seething (Site 10) and SPC5 – Landfill "Off West Side of Shelton Airfield Disused".
BEPS-430	Ground Conditions	The use of older data and interpreted boundaries adds further uncertainty The Applicant accepts that some of the historical mapping, geological information and ground condition data supporting the ES was procured in 2024 during scoping	The assessments presented in ES Volume 1, Chapter 16 Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping.

ID	Theme	Representation	Applicant's Response
		and not updated for the ES on the basis that the ground conditions themselves would not have changed, notwithstanding that the earlier Groundsure boundary differed from the Order Limits and had to be interpreted in relation to the final scheme. That may be acceptable for some geological descriptors, but it underscores the broad problem with the assessment: it is heavily interpretive and desk-based. It is not founded on a comprehensive intrusive evidence base matched to the final Order Limits.	The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). As described in ES Volume 1, Chapter 16 Ground Conditions [APP-052] <i>"As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent"</i>.
BEPS-431	Ground Conditions	The assessment of mineral sterilisation is preliminary, assumption-based and underplays long-term harm	The assessments presented in ES Volume 1, Chapter 16 Ground

ID	Theme	Representation	Applicant's Response
		Appendix 16.2 is expressly only a first-stage qualitative desktop study. It concludes that less than 4% of the Order Limits overlie safeguarded sand and gravel resources and that those resources are not presently considered economically viable or practical to extract, largely because of their limited area and constraints such as ecological designations, watercourses, roads and residential properties. It also says any sterilisation would be only temporary during the anticipated 60-year operational life. That reasoning is weak. There is no detailed reserve estimate, no operator evidence, no substantive viability appraisal, and no proper treatment of whether exclusion of safeguarded mineral for up to 60 years is, in practical planning terms, a major long-term sterilisation. Calling a 60-year exclusion 'temporary' materially understates its effect. In addition, the minerals appendix reinforces the hydrogeological sensitivity of several of the same locations identified elsewhere, because the safeguarded granular deposits are concentrated in valley and watercourse areas rather than uniformly distributed across the site. This is another indication that the Applicant is dealing with a geologically varied and sensitive system, not a straightforward agricultural landtake.	Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping. Norfolk County Council, the Minerals Planning Authority, have stated <i>"The County Council has been involved in discussions with the applicant's consultants regarding mineral resources and the potential for impacts from the proposed scheme"</i> and <i>"the County Council considers that the issue of mineral resource safeguarding has been correctly addressed in the ES, and that the embedded mitigation and subsequent work post-consent will enable the scheme to appropriately address the issue and therefore not result in needless sterilisation of safeguarded mineral resources"</i>. The NPPF (August 2026) requires that <i>"Proposals for mineral development should... not have unacceptable adverse impact on the natural and historic environment, human health or aviation safety"</i> and should <i>"ensure any unavoidable noise, dust and particle emissions and any vibrations"</i>

ID	Theme	Representation	Applicant's Response
			<i>from blasting will be controlled, mitigated or removed at source, and that appropriate noise limits are established for extraction in proximity to noise sensitive properties".</i> The Applicant's assessment of mineral viability aims to be consistent with the NPPF, taking into account the presence of sensitive receptors such as watercourses, ecologically sensitive sites and residential properties. On the basis of the work undertaken and the consultation and position-agreement with the Mineral Planning Authority, it was not deemed necessary to undertake further consultation with minerals operators in relation to the possibility of prior extraction of a limited quantity of mineral, the viability of which is constrained by multiple factors.
BEPS-432	Ground Conditions	The cumulative picture is one of uncertainty, assumption and deferral, not a robust absence of significant effects Taken together, the chapter, appendices and figures do not support the confident conclusion that no significant ground condition or groundwater effects would arise.	The Applicant refers to its response to BEPS-422 to BEPS-430. The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been

ID	Theme	Representation	Applicant's Response
		They show: • a narrowly defined contamination baseline based on a 250 m source-search radius; • express exclusion of RAF Tibenham from the contamination assessment on distance grounds alone; • acknowledged former RAF contamination sources at Hardwick and Seething including petroleum hydrocarbons, de-icers, metals, asbestos and PFAS; • a private water supply assessment built partly on assumptions because key source-strata and construction details are missing; • widespread Principal Aquifer bedrock and heterogeneous superficial deposits; • a sparse and discontinuous Diamicton thickness model rather than comprehensive site-wide proof of a protective barrier; • repeated post-consent deferral of the intrusive work needed to test the model; • a preliminary minerals assessment that downplays the practical consequences of long-term sterilisation. The result is that the ES presents a level of certainty that the underlying evidence does not justify.	undertaken in accordance with the methodology agreed following scoping.

ID	Theme	Representation	Applicant's Response
BEPS-433	Ground Conditions	Conclusion For all of these reasons, the Applicant has failed to demonstrate on a sound and complete evidential basis that the Scheme would avoid significant effects in relation to ground conditions, historic contamination, groundwater pathways, private water supplies and associated geological and mineral issues. The assessment is too narrow in scope, too dependent on assumptions, too reliant on sparse historical data, and too deferential to post-consent investigation and redesign. The Examining Authority and Secretary of State should therefore treat the current ground conditions evidence as insufficient to support a finding that the Scheme is environmentally acceptable in this respect.	The Applicant disagrees with this conclusion and refers to its response to BEPS-422 to BEPS-430. The assessments presented in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] have been undertaken in accordance with the methodology agreed following scoping.
BEPS-434	Ground Conditions	Remedies sought BEPS respectfully requests that the Examining Authority recommend, and the Secretary of State require, the following: that the Applicant be required to undertake and submit a full intrusive ground investigation and updated groundwater risk assessment before any final conclusion is reached on the acceptability of the Scheme, including parcel-specific assessment of former RAF Hardwick, former RAF Seething, and the wider Tibenham / Site 1–2 / BESS cluster.	The Applicant refers to its response to BEPS-422 to BEPS-430. The Applicant's position remains that the assessments presented in Chapter 16 - Ground Conditions [APP-052] and the ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184] have been carried out robustly, and in accordance with the methodology agreed following scoping. Ground investigation will be undertaken post-consent as agreed

ID	Theme	Representation	Applicant's Response
		- that the Applicant be required to produce a revised contamination conceptual site model that does not rely on a rigid 250 m source-search buffer and that expressly assesses off-site former RAF Tibenham and any other relevant legacy land uses capable of affecting the Order Limits, aquifers or private water supplies. - that the Applicant be required to identify, map and assess all private water supplies and abstractions likely to be affected by the Scheme, including clear differentiation between wells and boreholes, known or likely source strata, borehole construction, and receptor-specific vulnerability. - that the Applicant be required to provide a proper hydrogeological pathway analysis for all construction types, including piling, trenching, HDD, substations, BESS works and firewater scenarios, rather than relying on generic assertions about Diamicton protection. - a site-specific contamination and groundwater risk assessment has been approved by the relevant planning authority in consultation with the Environment Agency and local authority environmental health. - that the development consent order secure clear remediation, monitoring and liability provisions for any historic contamination or pollutant pathways disturbed or activated by the Scheme, including long-term	with the Environment Agency, with the results presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). Detailed Quantitative Risk Assessment or mitigation/remediation will also be undertaken if/where found to be necessary by the GQRA. The results of the ground investigation will also inform the Foundation Works Risk Assessments and Hydrogeological Risk Assessments required by the Outline CEMP [APP-196]. With the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to sensitive receptors (including private water supplies) can be suitably managed and effects are therefore assessed as 'Not Significant'.

ID	Theme	Representation	Applicant's Response
		groundwater and private-water-supply monitoring where appropriate. that the Applicant be required to submit a revised mineral sterilisation assessment, if the Secretary of State considers mineral impacts material, supported by a more robust viability appraisal and a realistic treatment of the practical effect of excluding safeguarded mineral for up to 60 years.	
BEPS-435	Electromagnetic Fields	Chapter 17 – Electromagnetic Fields Introduction BEPS objects to Chapter 17 of the Environmental Statement on the basis that it does not provide a lawful or robust assessment of the likely significant effects of electromagnetic fields arising from the Scheme. Although Chapter 17 presents itself as the EIA chapter for EMF effects, it in fact narrows its assessment to a high-level human-health exercise and fails properly to assess ecological receptors, sensitive human receptors, cumulative exposure, or site-specific effects arising from the actual configuration of the Scheme. The result is an assessment that is generic, desk-based and threshold-led rather than a genuine receptor-specific EIA. The chapter itself says it presents the findings of the EIA of effects on EMF and that it assesses likely significant effects arising from construction, operation, maintenance and decommissioning. Yet the actual scope adopted is much	The Applicant has used measured data, including field strength and distances, managed by National Grid to undertake the assessment upon human health [APP-188]. The Applicant therefore considers this data robust and reliable, which has been used to undertake the assessment and draw conclusions. Levels of EMF associated with the Scheme are known, as the voltages used by the infrastructure are designed to specifically comply with the infrastructure being used, and therefore does not vary. Effects during construction and decommissioning had been scoped out, as during these periods the Scheme will not be in use. As such,

ID	Theme	Representation	Applicant's Response
		narrower. Table 17.3 scopes in only impacts to human receptors during operation, with construction and decommissioning scoped out. The chapter concludes only on 'human health', and Table 17.7 lists only 'human receptors' as the assessed receptor class. That narrowing is inconsistent with the Scoping Opinion. The Planning Inspectorate expressly stated that EMF should be scoped in because of uncertainty surrounding cabling design and proximity to receptors, and that the ES should address risks to both human and ecological receptors, taking account of relevant technical guidance and setting out design measures to avoid likely significant effects.	there will be no electrical current to induce a magnetic field.
BEPS-436	Electromagnetic Fields	Failure to assess ecological receptors as required by the Scoping Opinion The most serious defect is that Chapter 17 does not itself assess ecological receptors at all. Instead, Table 17.1 states that a high-level EMF assessment 'pertaining to human health' has been undertaken in Chapter 17, while EMF effects on ecological receptors, including fish, are said to be considered in Chapter 8. That is inadequate for several reasons. First, the Scoping Opinion required the ES to address the risks to human and ecological receptors arising from EMF. It did not permit Chapter 17 to become merely a human-health note while ecological EMF effects were left diffuse or indirect elsewhere. Second, PINS specifically highlighted impacts	The Applicant has assessed potential EMF impacts on ecological receptors (notably aquatic invertebrates, watercourses and bats) within the ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], making reference to ES Volume 1, Chapter 17 - Electromagnetic Fields [APP-053] and the EMF chapter referencing Chapter 8: Ecology and Biodiversity. Embedded mitigation and avoidance measures during operational activities

ID	Theme	Representation	Applicant's Response
		to fish from EMF, noting that this had not been considered in the scoping material. Third, BEPS has long identified specific EMF concerns in relation to barbastelle bats, children and white-clawed crayfish, showing that these were known live issues and not peripheral ones. The area includes highly sensitive bat populations and important watercourses. Earlier scoping submissions recorded the need for a thorough evaluation of EMF effects on bats and noted evidence that bat activity significantly reduces in habitats exposed above certain field strengths. Chapter 17 nevertheless contains no bat assessment, no corridor analysis, no breeding or foraging analysis, and no aquatic receptor analysis. As a result, the EMF chapter does not do what the Scoping Opinion required.	are detailed in Outline OEMP [APP-197]
BEPS-437	Electromagnetic Fields	The appendix confirms the assessment is only a human-exposure screening exercise Appendix 17.1 materially strengthens this objection, because it makes explicit that the exercise is limited to 'safe levels for human exposure'. The report purpose states that Pager Power was retained to assess the potential impact of EMF from the Scheme 'with respect to safe levels for human exposure', and that the assessment considers the proposed underground power cables, transformers and substations. The appendix then repeatedly frames its conclusions purely in terms of 'human health'. It concludes there is no significant impact from underground and overhead cable	The Applicant has used measured data, including field strength and distances, managed by National Grid to undertake the assessment (ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188]) to determine the impacts upon human health. The Applicant therefore considers this data robust and reliable, which has been used to undertake the assessment and draw conclusions.

ID	Theme	Representation	Applicant's Response
		magnetic fields upon human health, that overhead 400kV cable electric fields require a 15m setback for receptors pertaining to human health, and that transformer and substation effects are less significant because the equipment is expected to be housed in enclosures and be CE/UKCA marked. That is not a full environmental assessment of EMF likely significant effects. It is a narrow human-exposure compliance note. It does not assess ecological receptors at all, and it does not carry out a proper EIA significance assessment across the scheme's actual receptor environment.	Levels of EMF associated with the Scheme are known, as the voltages used by the infrastructure are designed to specifically comply with the infrastructure being used, and therefore does not vary. The assessment has compared the distances between human-health receptors in the existing environment (such as residential dwellings) and electrical infrastructure as part of the Scheme, as opposed to identifying single receptors.
BEPS-438	Electromagnetic Fields	Reliance on generic external data rather than scheme-specific modelling The methodology is generic and insufficiently tied to the actual Scheme. Appendix 17.1 states that data from various cable configurations were sourced from EMFS.info and that maximum field data were used where possible. The chapter itself states that National Grid's emfs.info provides additional guidance regarding typical field strengths of overhead and underground cables. That approach is not enough for this Scheme. The assessment does not model the actual East Pye layout, the actual alignment of cables relative to dwellings, schools, PRow's or ecological corridors, the actual geometry of joint	The Applicant has used measured data, including field strength and distances, managed by National Grid to undertake the assessment (ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188]) to determine the impacts upon human health. The Applicant therefore considers this data robust and reliable, which has been used to undertake the assessment and draw conclusions. The assessment has considered the areas intended for panel areas, battery

ID	Theme	Representation	Applicant's Response
		bays and sealing end compounds, or the actual interaction between the new and existing 400kV infrastructure. Instead, it relies on typical values for generic 400kV and 132kV underground and overhead cables and treats those values as determinative. For example, the appendix states that a 400kV underground cable produces a maximum magnetic field of 95 micro-Tesla at 1m above ground directly above the centreline, while a 400kV overhead line produces a maximum electric field of 10.6 kV/m reducing to less than 5 kV/m within 15m. Those are generic values, not evidence of East Pye-specific conditions at actual receptor locations.	storage, transformers and cabling infrastructure in accordance with the layout for the scheme. Exact alignment is not considered significant as the electromagnetic field strength depends on distance, rather than the specific and precise route of every cable. The assessment uses established values for the relevant infrastructure to determine the field strength of electromagnetic fields. Levels of EMF associated with the Scheme are therefore known, as the voltages used by the infrastructure are designed to specifically comply with the infrastructure being used, and therefore does not vary.
BEPS-439	Electromagnetic Fields	No proper baseline survey and unjustified desk-only approach The chapter admits that the assessment is limited to desk-based analysis and that no site surveys have been undertaken or are anticipated. It says desk-based analysis is considered sufficient to assess baseline conditions. That is a strikingly weak basis for an EIA chapter on a 60-year NSIP with underground and overhead 400kV infrastructure, substations and grid diversions.	The Applicant outlines that human health receptors routinely experience varying EMFs within a regulated range. Table 1 of the technical assessment (ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188]) outlines the sources and field strengths of EMF experienced by humans. The EMFs associated with the infrastructure as

ID	Theme	Representation	Applicant's Response
		The scoping report had already acknowledged that no baseline surveys had been undertaken in relation to EMF. The ES has not remedied that weakness. There is still no measured baseline near sensitive receptors, no field validation, no location-specific survey evidence, and no post-construction monitoring commitment. The existing overhead cabling infrastructure is simply 'assumed' not to have a significant impact because it forms part of the baseline. That is not an evidence-based baseline assessment.	part of the Scheme are defined and established by principles of electromagnetic induction, and therefore a baseline measurement is not typically required. Resulting EMFs do not interact with existing conditions in a way that required baseline monitoring to determine its impact significance.
BEPS-440	Electromagnetic Fields	Threshold compliance is treated as equivalent to EIA adequacy Both the chapter and appendix reduce the exercise to comparison against generic reference thresholds. Chapter 17 says the 1998 ICNIRP safe levels are 100 micro-Tesla for magnetic fields and 5 kV/m for electric fields. Appendix 17.1 uses the same thresholds and says values above them would merely suggest that further investigation is required. EIA is not satisfied merely because a generic public reference level is not exceeded in a broad model. It requires assessment of likely significant effects on actual populations, human health, biodiversity and the environment in the receiving context. Chapter 17 instead converts the exercise into a narrow binary code-compliance screen.	The EMFs associated with the infrastructure as part of the Scheme are defined and established by principles of electromagnetic induction. The Applicant therefore considers the threshold values as outlined by the applicable guidance to be assessed against. The Applicant notes the ICNIRP guidelines introduced in 2010; however, these have not been incorporated into UK Policy. The Applicant therefore considers the thresholds as used in the assessment in accordance with the best applicable guidance and practices.

ID	Theme	Representation	Applicant's Response
		The problem is compounded by the fact that the appendix itself notes that the UK policy position is based on the 1998 ICNIRP guidelines and that 2010 ICNIRP guidelines have not been incorporated into UK policy. The chapter cites both the 2020 ICNIRP guidance and the 1998 ICNIRP guidance in its reference list, but the actual assessment uses the 1998 reference values. This reinforces the impression that the chapter is following a minimal historic compliance route rather than carrying out a precautionary, current and receptor-specific assessment.	
BEPS-441	Electromagnetic Fields	Sensitive human receptors are not properly addressed Even within the chapter's narrowed human-health scope, sensitive receptor analysis is lacking. Human health receptors are simply treated as 'medium sensitivity because people experience EMFs from a man-made environment regularly'. That is simplistic and fails to distinguish between adults, children, people with medical devices, people living adjacent to or repeatedly using affected routes, and those subject to prolonged or repeated exposure. The appendix itself acknowledges scientific concern around magnetic fields and childhood leukaemia, referring to epidemiological studies and WHO classification as 'possibly carcinogenic', even though causation is not established. Yet the ES does not then provide any project-specific assessment for children or other vulnerable groups. Nor does it assess mental stress, risk perception,	The Sensitivity is classified as Medium to reflect that people are routinely exposed to EMFs from a wide range of sources in everyday environments (irrespective of adults, children and people living with medical devices). The sensitivity should not be interpreted as a judgement regarding individual health vulnerability. The assessment [APP-188] considers thresholds developed by the ICNIRP to provide guidance when safeguarding all human health receptors, and not specific groups (i.e. adults or children). The 15m setback distance is part of the existing baseline, as a 'typical 400

ID	Theme	Representation	Applicant's Response
		sleep or other human wellbeing dimensions, notwithstanding the long operational lifetime of the scheme. The chapter also does not analyse PRowS, lanes, recreational routes or other spaces where repeated human presence may occur. The scoping material had referred to a minimum 15m offset from infrastructure to PRow, but the ES chapter appears to rely only on a 15m distance from overhead cables to human receptors and does not present a mapped receptor-led analysis of whether that is actually achieved or sufficient throughout the Scheme.	kV pylon is 45-50 metres tall' (Source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022).
BEPS-442	Electromagnetic Fields	Substations, transformers and BESS are not properly assessed Another major cause for objection to this application is the treatment of substations, transformers and BESS. The appendix says the assessment considers underground power cables, transformers and substations. But when it reaches those assets, it does not quantify actual field emissions from the East Pye Project Substations or National Grid Substation. Instead, it says they will be less significant because they will be enclosed and CE/UKCA marked Chapter 17 similarly assumes that project substations, the National Grid Substation and transformers are CE/UKCA marked and that the CE marking ensures electrical and	The Applicant has considered all electrical infrastructure part of the Scheme, including underground cables, utilising existing overhead cabling infrastructure, substations, transformers and BESS. The technical assessment within ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188] references CE/UKCA marking to demonstrate that electrical equipment must comply with applicable legislation. Therefore, the Scheme will be designed and operated in

ID	Theme	Representation	Applicant's Response
		electronic equipment does not generate or is not unintentionally affected by electromagnetic disturbance. That is not a substitute for a project-specific EMF assessment. Product conformity marking does not tell the Examining Authority what field levels East Pye's actual compounds will generate at actual receptor locations. The problem is greater still in relation to the BESS. The original scoping material recognised that the other EMF sources would include the new substations and the BESS and that discussion around the risk of EMF would cover BESS. Yet the final appendix's stated scope is underground power cables, transformers and substations, and Chapter 17 focuses overwhelmingly on cables. There is no dedicated BESS-specific EMF modelling, no inverter hotspot analysis, and no quantified BESS receptor assessment.	accordance with the regulatory requirements, and the electromagnetic field strength of any equipment will not exceed levels that the infrastructure was designed for. The battery cells within a BESS are direct-current (DC) and therefore a time-varying magnetic field is not induced (i.e. it stays constant as time goes on). Since the BESS does not generate an alternating magnetic field, the BESS will not produce an electromagnetic field.
BEPS-443	Electromagnetic Fields	Construction and decommissioning have been scoped out too readily Chapter 17 scopes construction and decommissioning out on the basis that the cables will not be powered during those phases. That is too narrow. The chapter says it assesses EMF effects arising from construction, operation, maintenance and decommissioning, but in reality it excludes construction and decommissioning almost entirely.	The Applicant considers the scoping out of the construction and decommissioning phases as appropriate, as the electrical infrastructure will not be electrically charged. In order for an EMF to be induced, the infrastructure must be carrying a current. Therefore, if infrastructure is not operational (i.e.

ID	Theme	Representation	Applicant's Response
		Even if powered cable EMF is absent during construction and decommissioning, those phases still involve temporary plant, altered working arrangements around existing overhead infrastructure, and potential close interactions between people, animals and retained or diverted 400kV infrastructure. The chapter makes no serious attempt to analyse those situations. It simply treats the issue as non-existent because new cables are not yet energised or are no longer energised.	during construction and decommissioning) then an EMF will not be produced. Any EMFs associated with retained operational transmission infrastructure already exist independently of the Scheme as part of the baseline.
BEPS-444	Electromagnetic Fields	Embedded mitigation and additional mitigation are inadequate Mitigation is also underdeveloped. The only clearly articulated mitigation in the appendix is the 15m clearance distance from overhead cables for receptors pertaining to human health. In the chapter, the conclusion is that no additional mitigation is required because no likely significant effects are anticipated. That is not consistent with the Scoping Opinion, which said the ES should set out the design measures to be implemented to avoid likely significant effects in line with DECC's Voluntary Code of Practice 2012. There is no EMF Management Plan, no baseline or validation monitoring, no post-construction verification, no operational monitoring triggers, no adaptive mitigation, and no meaningful receptor-specific avoidance strategy.	The Applicant's maintained minimum clearance of 15m is drawn from the data presented in the technical assessment within ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188], where the levels of EMF associated with 400kV overhead cables are below the reference levels. In practice, this mitigation measure is observed as National Grid state that a 'typical 400 kV pylon is 45-50 metres tall' (Source: East Anglia Green Energy Enablement (GREEN), Project Background Document, April 2022). The Applicant therefore considers that additional mitigation is not required, as likely significant impacts are not predicted.

ID	Theme	Representation	Applicant's Response
			The Applicant considers it has complied with the Scoping Opinion by using industry-standard infrastructure and assessment of the intended areas for infrastructure.
BEPS-445	Electromagnetic Fields	The cumulative assessment is superficial and legally weak The cumulative assessment is particularly weak. Chapter 17 says cumulative effects are theoretically possible where cable infrastructure exists or is buried within the same trench, identifies one development near Tivetshall St Margaret, and concludes that no significant cumulative effect is considered possible because of separation from residential dwellings. It then adds that household appliances contribute to overall exposure but at low voltages and only temporarily. Appendix 17.1 takes the same approach. It says cumulative assessment in the worst case is the addition of source 'a' and source 'b', then concludes that cumulative effects are not significantly impacted by household items and that all cumulative magnetic and electric fields are predicted to be significantly below acceptable exposure limits. That is not a serious cumulative EMF assessment for a large multi-site scheme with multiple electrical assets, grid connections, substations, a BESS, overhead line works and interaction with other energy developments. It does not map cumulative impacts from the proposed Norwich to	The typical electromagnetic fields for infrastructure associated with the Scheme (sections 4.2-4.3 of ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188]) are shown to be within and below the acceptable exposure limits of 100 micro-Tesla (μT) for magnetic fields and 5 (kilo-Volts per metre) kVm^{-1} for electric fields, considering the distance between the electrical infrastructure and human health receptors (i.e. residential dwellings). Therefore, the Applicant considers that the cumulative effects are not significantly impacted by the use of other sources of household items that are encountered by typical household equipment.

ID	Theme	Representation	Applicant's Response
		Tilbury pylon line, Tasway Energy Park or the three other BESS applications around Long Stratton. It does not map hotspots, does not quantify combined exposures in areas of overlapping infrastructure, and does not address ecological cumulative effects at all.	
BEPS-446	Electromagnetic Fields	Internal inconsistency with the project's own scoping and evolution The original scoping report recorded that where proposed cables are over 132kV, PINS guidance requires an EMF assessment appendix including location, routing and voltages of cables over 132kV and a risk assessment to human and ecological sensitive receptors within the zone of influence. It also identified immediately adjacent residential and ecological receptors as the appropriate study context. The ES has not delivered that. It has instead produced a desk-based, generic appendix that expressly assesses only safe levels for human exposure. The chapter therefore falls short not only of the Scoping Opinion, but also of the project's own earlier framing of what was required.	The Applicant has assessed the specific infrastructure pertaining to the Scheme as outlined in Section 1.2 of the technical assessment ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188]. The electromagnetic fields for infrastructure associated with the Scheme are shown to be within and below the acceptable exposure limits, and where it has exceeded these limits, the Applicant has reinforced that a minimum setback distance is to be maintained. The Applicant therefore considers it has complied with PINS guidance. The Applicant refers to its response to BEPS-438 regarding assessment of locations, routing and voltages of cables.

ID	Theme	Representation	Applicant's Response
BEPS-447	Electromagnetic Fields	Conclusion Chapter 17 and Appendix 17.1 do not amount to a robust EIA assessment of EMF effects. They are materially deficient because they: - do not assess ecological receptors within the EMF chapter, despite the Scoping Opinion expressly requiring risks to human and ecological receptors to be addressed; - are confined to a high-level human-exposure exercise; - rely on generic EMFs.info and "typical" infrastructure values rather than East Pye-specific modelling; - contain no proper measured baseline and no commitment to monitoring; - use generic threshold compliance as a substitute for receptor-specific EIA significance assessment; - fail to assess children and other vulnerable human receptors properly; - do not quantify the actual EMF effects of the Project Substations, National Grid Substation and BESS; - scope out construction and decommissioning too readily; - and contain only a superficial cumulative assessment.	The Applicant has considered EMF impacts upon human health with respect to accepted guidance and reference levels by UK policy. The technical assessment within ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188] presents that The electromagnetic fields for infrastructure associated with the Scheme are shown to be within and below the acceptable exposure limits, and where it has exceeded these limits, the Applicant has reinforced that a minimum setback distance is to be maintained. The Applicant has used EMFs.info which presents measured data, including field strength and distances, and is managed by National Grid to undertake the assessment (ES Volume 3, Appendix 17.1 – High-Level Electromagnetic Field Assessment [APP-188]) to determine the impacts upon human health. See response to BEPS-438

ID	Theme	Representation	Applicant's Response
		For those reasons, the conclusion that EMF effects are 'Minor and Not Significant' and that no additional mitigation is required is not reliable.	A measured baseline/monitoring is not considered to be required, as the EMF will use infrastructure for which the EMFs are known. The Applicant refers to its response to BEPS-438. Human health receptors are routinely exposed to EMFs from a wide range of sources in everyday environments (irrespective of adults, children and vulnerable human health receptors). The sensitivity should not be interpreted as a judgement regarding individual health vulnerability. Substations and transformers are marked CE/UKCA and required to do so to demonstrate that electrical equipment must comply with applicable legislation. The battery cells within a BESS are direct-current (DC) and therefore does not generating an alternating magnetic field. The Applicant refers to its response to BEPS-442. The Applicant considers the scoping out of the construction and

ID	Theme	Representation	Applicant's Response
			decommissioning phases as appropriate, as the electrical infrastructure will not be electrically charged and therefore no EMF will be produced. The Applicant refers to its response to BEPS-443. The cumulative assessment is considered in proportion to the assessment results of the Scheme and expected sources of other EMFs. Given that the Scheme is not predicted to cause significant EMFs, and existing sources are also not considered to cause significant EMFs, levels are expected to remain below the recommended exposure limit.
BEPS-448	Electromagnetic Fields	Remedies sought BEPS requests that the Applicant be required to provide a revised and expanded EMF assessment before the examination can properly test this topic. That revised assessment should: • assess both human and ecological receptors within a coherent EMF chapter;	The Applicant refers to its response to BEPS-435 to BEPS 447.

ID	Theme	Representation	Applicant's Response
		- include scheme-specific modelling of all 132kV and 400kV cables, substations, transformers, BESS and grid interface works; - identify and assess sensitive receptors including children, PRowS, homes, bats, fish and white-clawed crayfish; - provide a measured baseline and a post-construction monitoring and verification strategy; - justify the choice of technical standards and address current guidance transparently; - provide a real cumulative assessment of overlapping infrastructure and nearby energy schemes; - and include a secured EMF Management Plan and any necessary rerouting, buffering or design changes to avoid likely significant effects. Until that is done, Chapter 17 should be treated as inadequate and its conclusions should be given little or no weight.	
BEPS-449	Other Environmental Matters	Chapter 18 – Other Environmental Matters Introduction BEPS objects to Chapter 18 of the Environmental Statement on the basis that it adopts a downgraded and overly selective approach to matters that are central to the safety, deliverability, environmental risk and human	The topics to be included within ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] were agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]) and statutory

ID	Theme	Representation	Applicant's Response
		consequences of the Scheme. The chapter itself states that it is intended to collate topics said not to warrant individual chapters because of brevity or absence of likely significant effects, and it expressly says that, for the majority of topics covered, the assessments do not follow the Chapter 2 EIA methodology but instead use alternative, topic-specific methods in a 'high-level assessment'. The matters included are major accidents and disasters, telecommunications/utilities/television, glint and glare, waste and materials, and a human health summary statement. That framing is problematic in itself, because the chapter is treating major safety, infrastructure and health issues as residual or secondary matters when several are plainly fundamental to this scheme.	consultation. Each topic within ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] provides a summary of how relevant Scoping Opinion comments have been addressed. The approach to Other Environmental Matters is considered to be proportionate, in line with EIA good practice.
BEPS-450	Other Environmental Matters	Inappropriate 'high-level' treatment of significant matters The chapter's own methodology undermines confidence in its conclusions. A chapter that deals with major accidents, utility conflicts, high-pressure gas infrastructure, BESS fire risk, aviation glare and human health ought not to proceed on the premise that a full Chapter 2 methodology is unnecessary. The project is geographically extensive, infrastructure-heavy and close to sensitive receptors. It therefore requires robust, topic-specific assessment rather than a summary chapter which assumes that significant effects are unlikely and then reasons backwards from that assumption.	See response to BEPS-448. ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] is considered to provide a proportionate assessment of effects for these topics. Each topic sets out the assessment methodology and identifies the relevant mitigation measures relied upon within the assessment of effects. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205].

ID	Theme	Representation	Applicant's Response
BEPS-451	Other Environmental Matters	Major accidents and disasters MAD.1 Scoping-out does not resolve the substance of the risk The chapter states that major accidents and disasters have been 'sufficiently addressed' and pose no likely adverse significant effects, while also confirming that this topic is scoped out of further assessment. It relies heavily on cross-reference to the Outline Battery Safety Management Plan, Outline CEMP and other chapters rather than presenting a detailed project-specific consequence analysis within Chapter 18 itself. That is not a satisfactory approach for a scheme including a BESS, large substations, extensive underground works and known hazardous infrastructure constraints.	It was agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] has been produced to further demonstrate that Major Accidents and Disasters have been sufficiently addressed, with mitigation measures secured and pose no likely significant effects. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205] and the Design Principles, Parameters and Commitments [APP-213].
BEPS-452	Other Environmental Matters	MAD.2 BESS fire, toxic release and contaminated firewater remain inadequately assessed The chapter records concerns raised in consultation about hydrogen fluoride release, prolonged BESS fires, fire suppression, PFAS contamination, groundwater and river pollution, and the location of the BESS relative to sensitive	It was agreed with through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. The scope of the assessment

ID	Theme	Representation	Applicant's Response
		receptors and drinking water protection areas. The response is essentially that these issues are addressed by the Outline BSMP and by cross-reference to the Water Environment chapter. That is not the same as a quantified major accident assessment. There is still no evident worst-case modelling within Chapter 18 itself of thermal runaway, toxic plume spread, contaminated firewater escape, emergency access or failure of containment. While the submitted OBSMP appears to meet the limited scoping requirement that fire risk and relevant mitigation, including fire-fighting and environmental containment measures, be set out, it does so only at outline level and leaves many of the decisive matters — including the final battery chemistry, detailed BSMP, final plume analysis, hydraulic containment design, FMEA/LOPA, FRA, ERA and DSEAR assessment — to post-consent approval. It therefore answers the scoping request in form, but not fully in evidential certainty.	presented is therefore appropriately proportionate. The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The Applicant emphasises that it is not possible to select a BESS design and conduct all risk assessments during the DCO process because BESS suppliers typically introduce new designs every 12-18 months. If a design was selected during the DCO Application process it would be obsolete by the time the procurement process started during the detailed design stage. The Applicant's Outline BSMP [APP-200] fully accommodates the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs.

ID	Theme	Representation	Applicant's Response
			The safety objectives for the design of the BESS site are listed in Section 1.4 of the Outline BSMP [APP-200]. Section 1.4.2 of the Outline BSMP [APP-200] stipulates: <i>“Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> <i>• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site</i>

ID	Theme	Representation	Applicant's Response
			<i>operatives, first responders, and the local community; and</i> <i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."</i> As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [APP-200] pre-construction requirements (Section 5). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure fire, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of

ID	Theme	Representation	Applicant's Response
			Peak Heat Release Rate, maximum burn temperatures, etc. Sections 5.1.3 – 5.1.6 of the Outline BSMP [APP-200] addresses the requisite risk assessments and consequence modelling that address all credible BESS failure events which will be provided at the detailed design stage. The Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in the Outline BSMP [APP-200] Appendix B: Battery Energy Storage System (BESS) Fire – Emissions to Air Risk Assessment) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA)

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			requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude that the "proposed development should not result in any significant adverse impact on public health." The spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred; therefore, this is a credible worst-case scenario. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment

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			within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 4.4.3 – 4.4.5 of the Outline BSMP [APP-200] stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: <i>“Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.”</i> The Plume Study in Appendix B assesses the battery fire emission impacts on air quality at six worst case fire locations (using the illustrative BESS design in Appendix A) on sensitive receptors within a 1km radius of the BESS Site. Typically, a BESS fire would be a relatively short-term

ID	Theme	Representation	Applicant's Response
			incident. The Plume Study therefore compared predicted concentrations against Acute Exposure Guidance Levels (AEGs) and Emergency Response Planning Guidelines (ERPGs) which are relevant to short term releases, in addition to National Air Quality Objectives (NAQOs). Based on the factors of distance to the nearest property and the anticipated short-term nature of a fire incident, the assessment in Appendix B concludes that there will not be significant adverse effects at the closest residential receptor locations because of a BESS fire incident. To validate the final BESS site design, the Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 4.5.13 of the Outline BSMP [APP-200] and secured through the DCO: <i>“at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km</i>

ID	Theme	Representation	Applicant's Response
			<i>radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."</i> Section 2 of the Outline BSMP [APP-200] documents the Applicant's consultation with NFRS and Section 5 of the Outline BSMP [APP-200] covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Outline BSMP [APP-200] section 4.5 documents the drainage strategy

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			for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the Outline BSMP [APP-200] is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The Environment Agency (EA) is a statutory consultee for the Scheme, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A Statement of Common Ground between the Applicant and the EA will be submitted as part of the DCO process. The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft Development Consent Order [AS-

ID	Theme	Representation	Applicant's Response
			032] . This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency, prior to the commencement of the works for the BESS. The BSMP will be substantially in accordance with the Outline BSMP [APP-200] .
BEPS-453	Other Environmental Matters	MAD.3 HSE consultation zones and gas-main interaction are serious constraints The chapter records that HSE identified consultation zones affecting several site areas and cable corridors, including the Natural Gas 5 Feeder pipeline. The applicant's response is engagement, easements and future location checks such as LSBUD. That does not amount to an assessment of the consequences of construction near the pipeline, inadvertent strike, incompatibility of infrastructure with easement requirements, or cascading accident scenarios involving high-voltage electrical infrastructure and gas assets.	The Applicant has considered utilities in the design of the Scheme, including the high-pressure gas main. Offset to utilities from infrastructure of the Scheme are shown on the Works Plan [AS-002 and AS-003]. The Draft DCO [AS-032] includes for Protective Provisions in Schedule 14 to safeguard utilities assets and associated operations.
BEPS-454	Other Environmental Matters	MAD.4 UXO risk is still deferred The chapter records that PINS expected further commitment on UXO because the nature and extent of the	The ExA confirmed within the Scoping Opinion that <i>'The Applicant should commit to further UXO surveys in order to identify the full extent of the risk and</i>

ID	Theme	Representation	Applicant's Response
		risk remained unclear. The response remains future detailed study and possible further surveys, rather than a concluded assessment. This is another example of deferral rather than resolution.	<i>inform appropriate mitigation'. As secured within the Outline CEMP [APP-197], the detailed CEMPs will include the UXO mitigation measures recommended within ES Volume 3, Appendix 16.1 – Phase 1 Ground Conditions Assessment, Annex 6 UXO Desk Study and Constraints Assessment [APP-184]. The embedded mitigation measures to address UXO include detailed UXO desk study to confirm the UXO hazard level. Where a potential UXO hazard is identified by the detailed UXO desk study, the detailed study will included further recommended mitigation measures for the identified types of development and anticipated working practices could also include non-intrusive surveys to further delineate potential UXO hazards.</i>
BEPS-455	Other Environmental Matters	Telecommunications, utilities and infrastructure The utilities map shows conflict, not resolution The utilities section confirms numerous utility assets within the Order Limits, including Openreach, Gigaclear, B4RN, Anglian Water assets, Cadent gas assets and National	The Applicant refers to its response to BEPS-453.

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		Gas Transmission high-pressure gas infrastructure. It specifically states that the high-pressure gas pipeline passes through Sub-Sites 5A, 5B, 7B, 7E, 7F and CRC7, and that an existing dual-circuit 400kV overhead line with five pylons runs through Site 1. Figure 18.1 therefore demonstrates the existence of substantial utility conflict across the Scheme. It does not, however, demonstrate that those conflicts have been adequately assessed or resolved.	
BEPS-456	Other Environmental Matters	High-pressure gas main risk remains a core objection The presence of a high-pressure gas pipeline through multiple development parcels is a major planning and safety issue, not a minor utilities matter. Chapter 18 does not satisfactorily assess whether solar infrastructure, substations, construction compounds, trenching, abnormal loads or worker facilities are compatible with the consultation zones, easements and safety requirements applying to that asset. Nor does it provide a quantified risk assessment of consequence, stand-off or emergency response. This is a serious omission.	The assessment provided within ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] is suitably proportionate and mitigation measures, as detailed in response to BEPS-453, have been embedded into the Scheme.
BEPS-457	Other Environmental Matters	Other infrastructure interdependencies are not properly integrated The chapter does not present a convincing integrated assessment of how utility constraints interact with other risks: for example, whether a gas-main incident, flood event, electrical fault or firewater escape could trigger combined consequences. These interdependency risks are	It was agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. The scope of the

ID	Theme	Representation	Applicant's Response
		central for a dispersed NSIP of this kind and are not answered by mapping alone.	assessment presented is therefore appropriately proportionate.
BEPS-458	Other Environmental Matters	Glint and glare GG.1 The appendix does not show absence of effect Appendix 18.1 concludes that there is no significant impact on road safety or residential amenity, and that solar reflections towards all aerodromes could be operationally accommodated subject to consultation. However, the underlying results are far less reassuring. Solar reflections are geometrically possible along 4.2 km of the A140 and 7.9 km of the B1527. They are also geometrically possible towards all 482 assessed dwellings. The report then reduces these effects largely through desk-based screening and reliance on proposed mitigation planting.	The Applicant has assessed impacts upon road safety, residential amenity and aviation activity in accordance with applicable and available guidance and industry best practices. The assessment considers the geometric possibility of a reflection, and the predicted impact with respect to the existing environment. Where required, mitigation has been proposed with factors such as the height calculated. This methodology has been implemented on many NSIPs and DCOs.
BEPS-459	Other Environmental Matters	GG.2 Reliance on proposed planting and desk-based screening For roads, the conclusion of no significant effect depends in part on 'the Scheme's proposed landscape mitigation' for remaining B1527 sections within the driver's primary field of view. For dwellings, 46 of the 68 dwellings left after initial screening are reduced to low impact by proposed landscape mitigation. The assessment is therefore not simply recording existing conditions; it is assuming mitigation success. The report also confirms that it relies on geometric calculations followed by consideration of existing	The Applicant has considered existing conditions, which has led to implementing mitigation measures when impacts were considered significant. The Applicant has also considered where views may remain as part of a robust assessment, and therefore acknowledges that the impact would be low (as opposed to a moderate) even after implementing mitigation.

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		and proposed screening, and elsewhere it refers to desk-based review of available imagery, Google Earth viewshed and the landscape mitigation plan. That is a limited basis on which to dismiss impacts for a scheme of this scale.	
BEPS-460	Other Environmental Matters	GG.3 Aviation effects are more serious than the summary suggests The appendix states that yellow glare, defined as 'potential for temporary after-image', is geometrically possible towards the approach path or final section of visual circuits for all assessed aerodromes. It records durations of yellow glare up to 22,711 minutes annually, or 8.64% of daylight hours, for Seething Airfield with SAT panels; 11,304 minutes or 4.30% for Hardwick; and 10,094 minutes or 3.62% for Norfolk Gliding Airfield. The report seeks to reduce concern by saying these effects could be operationally accommodated, but those are substantial predicted durations, not trivial or de minimis values.	The Applicant considers this comment relies on the geometrical modelling results without considering the operational context which these values, and moreover, the impact, which these values are interpreted. Further, analysis where yellow glare is predicted is shown to coincide with views of the sun, or occur in instances behind a pilot and not within the field of view.
BEPS-461	Other Environmental Matters	GG.4 Norfolk Gliding Club / Tibenham-specific results show moderate impacts Appendix J goes further. It states that 38 circuit and approach paths were modelled for powered and gliding aircraft and records 'moderate impact' predictions for several 08-direction circuit variants, including 08 LHD Power Minimum and Maximum, 08 LHD Glider Minimum and Maximum, 08S LHD Glider Minimum and Maximum, and 08L LHD Glider Minimum and	The Applicant has illustrated the instances of yellow glare towards the modelled receptors for Norfolk Gliding Club in ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [APP-189 to 193] . The analysis has shown that instances of yellow glare are behind a pilot and not within the field of view.

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		Maximum. Each is then said merely to be capable of operational accommodation, subject to consultation with Norfolk Gliding Club. A report which identifies multiple moderate impacts on gliding circuits cannot sensibly be characterised as showing no meaningful aviation issue.	
BEPS-462	Other Environmental Matters	GG.5 The cumulative assessment is too narrow The cumulative glint and glare assessment is expressly 'high-level' and considers only one existing solar development to the west. That is plainly inadequate in the wider Norfolk context and does not reflect the cumulative solar/BESS burden already raised elsewhere in these representations.	The Applicant has considered cumulative effects where cumulative impacts are possible. For glint and glare, a cumulative impact is possible when receptors coexist simultaneously for two (or more) schemes. In the case of the Scheme, this is the solar development to the west of Norwich Road, south of Bungay Road, north of Brand's lane and east of Parkes Lane, as other developments, reviewed by the Applicant, are not considered to have a cumulative impact due to the distance from the Scheme and its receptors.
BEPS-463	Other Environmental Matters	Waste and materials The chapter is more developed than at PEIR stage, however, the issue is no longer complete absence of information but adequacy and realism. Given the scheme lifetime, BESS replacement profile and decommissioning burden, the Examining Authority should require close scrutiny of the assumptions underpinning waste volumes,	The assessment of waste volumes, replacement requirements, and disposal pathways is assessed in Section 18.5 of ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] . The Applicant has sought to provide a suitably conservative estimate of likely waste streams based

ID	Theme	Representation	Applicant's Response
		replacement rates, recovery rates and disposal pathways. The fact that these matters are now tabulated does not by itself prove that the assessment is conservative, complete or deliverable.	on the current Scheme design and current waste handling practices and capacity, to ensure the assessment identifies the worst-case effects likely to be generated by the Scheme. The Applicant has committed to minimising waste through the application of the waste hierarchy and the provision of a Site Waste Management Plan through Outline CEMP [APP-196] , secured by Requirement 13 of Schedule 2 to the Draft DCO [AS-032] . The Applicant is seeking to agree these measures with Norfolk County Council as the host Minerals and Waste Planning Authority, and will confirm both the Applicant and Council's position through the Statement of Common Ground (SoCG).
BEPS-464	Other Environmental Matters	Human health The chapter provides only a 'Human Health Summary Statement', not a full integrated health assessment. That is inadequate for a project raising combined issues of fire risk, toxic release, water contamination, traffic, landscape industrialisation, amenity change and stress effects. Health is not confined to noise and traffic; it runs across multiple chapters. A summary statement does not provide a	The Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] was prepared following the Planning Inspectorate's Scoping Opinion, which confirmed that a standalone Human Health chapter was not required. Instead, health-related effects were to be assessed

ID	Theme	Representation	Applicant's Response
		satisfactory assessment of those cumulative and cross-cutting effects.	within the relevant Environmental Statement technical chapters and cross-referenced where appropriate. The Statement brings together the health findings from across the Environmental Statement, including transport and access, noise and vibration, air quality, water environment, climate change, socio-economics, ground conditions, soils and agricultural land, and electromagnetic fields. It considers potential effects on physical, mental and social wellbeing, including impacts on vulnerable groups, mitigation measures, residual effects, and cumulative and in-combination effects. The Statement therefore provides a clear summary of health effects across the Scheme, rather than repeating the detailed technical assessments. Taking account of embedded and additional mitigation, it concludes that no likely significant adverse residual effects on human health are anticipated.

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BEPS-465	Other Environmental Matters	Overall conclusion Chapter 18 does not demonstrate that these matters are minor, fully assessed or incapable of significant effect. Rather, it shows that important matters have been grouped into a catch-all chapter, assessed by reduced or alternative methodology, and then discounted by cross-reference, assumed mitigation and operational accommodation. The result is not a robust environmental assessment of 'other' matters, but a chapter that minimises some of the Scheme's most important safety, infrastructure and human consequences.	The Applicant refers to its response to BEPS-449 to BEPS-464.
BEPS-466	Other Environmental Matters	Remedies sought The Examining Authority is requested to require the applicant to produce a fuller and more rigorous assessment of Chapter 18 matters, including a project-specific major accidents assessment; quantified consequence analysis for BESS fire, toxic release and contaminated firewater; a proper utilities and gas-main compatibility assessment with stand-offs, easements and quantified risk where required; a revised glint and glare assessment that does not rely so heavily on assumed future planting and that fully addresses impacts to Norfolk Gliding Club circuits and wider aviation safeguarding concerns; a more realistic cumulative glint and glare assessment; and a proper integrated human health assessment rather than a summary statement. In the absence of this further work, the Secretary of State should	The Applicant considers that ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] adopts a suitably proportionate approach, as agreed through the EIA Scoping process.

ID	Theme	Representation	Applicant's Response
		treat the unresolved safety, utility, aviation and health risks as weighing materially against consent.	
BEPS-467	Cumulative and In-Combination Effects	Chapter 19: Cumulative and In-Combination Effects Introduction The Applicant's Chapter 19 does not provide a robust or legally adequate assessment of the in-combination effects of this Scheme. For a project of this scale, geographic spread and duration, the assessment should identify how multiple harms interact upon the same receptors across construction, operation and decommissioning. Instead, the chapter adopts an artificially narrow methodology, relies heavily on the conclusions of earlier topic chapters, and materially understates the true combined burden of the proposal on communities, landscapes, heritage, water environments, transport receptors and ecological interests. Chapter 19 itself recognises that the EIA Regulations require the assessment to identify, describe and assess the interaction between factors, and that Schedule 4 requires likely significant effects to cover direct and indirect, secondary, cumulative, short-, medium- and long-term, permanent and temporary, positive and negative effects. It also cites EN-3's expectation that where cumulative effects on the local road network or residential amenity are predicted from multiple energy infrastructure and housing developments, applicants may need to coordinate to minimise disruption. Against that standard,	A comprehensive Cumulative and In Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate guidance, as detailed within ES Volume 1, Chapter 2 EIA Methodology [APP-038]. Two types of cumulative effects have been assessed within the ES: • In-combination effects – the inter-relationship between individual development effects on one particular receptor; and • Cumulative effects – multiple existing and/or approved developments generating additive effects which together have an increased effect on the same receptors. Each topic chapter within the ES [APP-042 – APP-054] sets out how the particular topic area has considered and assessed the cumulative effects arising as a result of other existing or proposed development. A summary of all cumulative effects is provided within

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		the assessment presented is too limited and too abstract to discharge the Applicant's obligations.	Table 20.4 of ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056] . ES Volume 1, Chapter 19 - In-Combination Effects Assessment [APP-055] . Provides an assessed of in-combination effects, where receptors are subject to residual effects under more than one environmental topic. In-combination effects have been considered during construction, operation, and decommissioning phases of the Scheme.
BEPS-468	Cumulative and In-Combination Effects	Misleading mapping and scoping-out of Tasway Energy Park The Applicant's cumulative mapping is misleading. It depicts other major housing, solar, BESS and infrastructure schemes as single dots rather than showing their actual red-line extent, land-take, linear corridors or zones of influence across the landscape. That cartographic choice materially understates the scale of surrounding development and gives a false impression that these are isolated, point-based proposals with limited relevance to East Pye's cumulative effects. In reality, schemes such as Tasway, Norwich to Tilbury, major substations, BESS	The Applicant refers to its response to BEPS-126 regarding the cumulative assessment and ES Volume 2, Figure 2.1 - Cumulative Developments [APP-058]. The EIA Regulations require the assessment to take into account '<i>the cumulation of effects with other existing and/or approved projects...</i>' (Schedule 4, paragraph 5(e)) and the same is required by the Planning Inspectorate's <i>Advice on Cumulative Effects Assessment</i>.

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		compounds and strategic housing growth are not experienced as dots; they are experienced as extensive areas of land-take, route corridors, construction traffic catchments, visual envelopes and overlapping impacts on the same villages, lanes, heritage settings and countryside. A cumulative map which reduces very large schemes to tiny dots conceals the true density and spread of development pressure in South Norfolk and makes it much harder for decision-makers and the public to understand the real pattern of industrialisation emerging across the receiving landscape. For a lawful and fair cumulative assessment, the Applicant should have mapped the actual footprints and spatial extents of neighbouring schemes, not a simplified point-symbol version that minimises their apparent presence and cumulative significance. At Consultation, South Norfolk Council and Norfolk County Council both stated that the significant cumulative impacts of East Pye together with Tasway Energy Park and other proposed energy projects had not been adequately explored, and NCC specifically said the cumulative impact assessment needed to consider Tasway and BESS infrastructure in the area. It is therefore inconsistent and misleading for East Pye to scope Tasway out, particularly where BEPS has recorded evidence that Tasway adjoins East Pye, remains only paused, and is in discussion about sharing a grid connection with East Pye Solar at Great Moulton.	The Applicant understands that the proposed Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorate's website as a DCO project. If this position changes during Examination and further information becomes available then the Applicant will update its cumulative effects assessment accordingly. Should the Tasway Energy Park project proceed, the cumulative effects of the East Pye Solar and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance.

ID	Theme	Representation	Applicant's Response
		If Tasway can be excluded on the basis that it is gate 1 and not yet fully progressed, then the same logic would also undermine the inclusion of East Pye's own BESS which is itself dependent on uncertain future grid arrangements. The Applicant cannot lawfully apply a strict uncertainty filter to neighbouring schemes while simultaneously relying on a much more flexible and assumption-based approach for its own BESS. That is not a fair or consistent cumulative methodology; it is a selective one that suppresses the true combined scale of industrialisation around Great Moulton, Tasburgh and the wider South Norfolk landscape.	
BEPS-469	Cumulative and In-Combination Effects	The methodology is too narrow and excludes many real effect interactions Chapter 19 states that in-combination effects have only been considered where residual adverse or beneficial effects of at least slight or minor have been identified for a receptor group. It further states that, to qualify, an effect must be minor or greater and must share a receptor with another effect. The chapter then says that the 'scale of the effect interaction has not been identified', only its significance, and that professional judgment is applied where all residual effects on a receptor are individually non-significant but may combine to create a significant interaction. That approach is objectionable for several reasons. First, it filters the assessment through the residual findings of the underlying topic chapters, so any underassessment,	In-combination effects refer to the inter-relationship between individual development effects between topics, therefore the in-combination effects assessment is appropriately based upon the residual effects presented within each topic chapter. See earlier responses regarding the technical assessment methodologies and mitigation measures. Negligible effects have not been considered within the in-combination effects assessment. Negligible effects are defined as '<i>an effect that is likely to have a negligible or neutral influence, irrespective of other effects</i>'. By the definition of a negligible effect, they do

ID	Theme	Representation	Applicant's Response
		scoping-out, deferred evidence or optimistic mitigation assumptions in those chapters are simply imported into Chapter 19. Secondly, by excluding negligible or lesser effects from further consideration, the methodology risks missing precisely the kind of multi-layered burden that this dispersed NSIP creates, where a series of individually moderated or 'not significant' harms may nevertheless become significant when experienced together over the same place and over long periods. Thirdly, the chapter expressly declines to identify the scale of effect interaction. For a multi-site scheme extending across numerous settlements, lanes, water environments and heritage settings, that is a serious methodological weakness. An in-combination chapter should explain not just whether interactions exist, but how extensive they are, where they occur, how long they endure, and how they overlap spatially and temporally. The Planning Inspectorate's Scoping Opinion required the ES clearly to identify where professional judgement is relied upon to determine significance, and to justify that use. Chapter 19 instead uses professional judgment as a central mechanism for determining whether multiple non-significant effects become significant, but without a sufficiently transparent framework showing how that judgment has been exercised receptor by receptor across the Scheme.	not justify further consideration, and would not give rise to in-combination effects on receptors. The methodology presented within ES Volume 1, Chapter 19 -In-Combination Effects Assessment [APP-055] is considered to be appropriate, and the chapter sets out how professional judgement has been used within the in-combination effects assessment.

ID	Theme	Representation	Applicant's Response
BEPS-470	Cumulative and In-Combination Effects	The chapter reduces the receptor groups to an implausibly small set Chapter 19 says that the receptor groups likely to experience significant in-combination effects during construction and decommissioning are 'local residents and users of the local area', and during operation are 'local residents and users of the local area' and 'ecologically-designated sites'. That is plainly under-inclusive for East Pye Solar. This Scheme is not a compact site. South Norfolk Council records that it is spread across multiple locations amounting to about 2,232 hectares, with solar sites, BESS, substations, cable route corridor and grid connection infrastructure, and a 60-year operational phase. The Scoping Opinion also records the need for detailed assessment of matters including decommissioning, operation, underground cables, access points, HDD works, EMF, water resources, WFD effects, private water supplies, socio-economics, human health, ground conditions, lighting, conservation areas and visual effects beyond 2 km. Against that background, it is not credible to reduce the principal in-combination receptor groups to so few categories. The chapter fails adequately to recognise and assess, as distinct receptor groups, at least the following:	Stage 1 of the in-combination effects assessment is identifying 'receptor groups' based on whether a sensitive receptor is exposed to more than one type of residual effect across the ES topics. The term 'receptor-group' is used to highlight that the approach taken for the in-combination does not assess every individual receptor assessed at the EIA stage, but rather potentially sensitive groups of receptors identified through the EIA process. The receptor groups assessed are considered to be proportionate and suitable following review of the ES topic chapters. The in-combination effects assessment considers the following receptor groups: • Residents and occupants/users of surrounding land uses, including places of work and the local road network; • Users of PRoW and walking routes;

ID	Theme	Representation	Applicant's Response
		- private water supply users and communities dependent on potable groundwater; - heritage assets and their settings, including conservation areas and listed churches; - pedestrians, cyclists, equestrians and other non-motorised users exposed to combined transport, noise, intimidation and visual effects; - rural businesses and farm enterprises exposed to combined land use, traffic, amenity and economic impacts; - schools, children and other vulnerable human receptors; - PRoW users whose enjoyment, safety and tranquillity may be affected by multiple overlapping impacts; - and sensitive ecological corridors and species receptors affected by the interaction of lighting, hydrology, noise, vibration, EMF and habitat change. These are not peripheral concerns. They are core receptors already identified elsewhere in the record, including in the Scoping Opinion and the local authority consultation responses.	- Heritage assets including listed buildings, conservation areas, and archaeological sites; and - Ecologically-designated sites and priority habitats
BEPS-471	Cumulative and In-Combination Effects	The assessment improperly depends on contested or incomplete topic chapters	The in-combination effects assessment within ES Volume 1, Chapter 19 - In-Combination Effects Assessment [APP-055] is appropriately based upon

ID	Theme	Representation	Applicant's Response
		Chapter 19 is only as reliable as the chapters beneath it. Where underlying topic assessments remain partial, heavily mitigated on paper, dependent on future control plans, or otherwise disputed, Chapter 19 cannot simply treat their residual effects as settled inputs to a concluding matrix. The Scoping Opinion required further assessment of water resources, flood risk, WFD, private water supplies, EMF, telecommunications and utilities, minerals, waste and materials, socio-economics, human health cross-referencing, ground conditions, conservation areas, visual effects beyond 2 km, night-time lighting, and various ecological matters. Norfolk County Council's LLFA response likewise criticised the methodology for inconsistency, lack of confidence, poor definition of timescales, and inadequate treatment of cumulative effects, especially because proposed but unconsented schemes may be constructed at similar times and may create wider downstream flood effects. Where important baseline work, methodology, sequencing or cumulative context has been challenged in the underlying chapters, Chapter 19 cannot lawfully present a neat summary of effect interactions as though those precursor assessments are complete, stable and beyond dispute. Its conclusions are therefore structurally weak.	the residual effects presented within each topic chapter, which are considered to provide a robust basis for the assessment. See earlier responses regarding the technical assessment methodologies and mitigation measures.

ID	Theme	Representation	Applicant's Response
BEPS-472	Cumulative and In-Combination Effects	Failure to assess the real combined burden on residents and communities The chapter does acknowledge that residents and users of the local area may experience significant in-combination effects. However, the way it does so is superficial. Table 19.1 lists visual effects, vibration, construction traffic noise, water supply and demand, contamination exposure, transport effects and socio-economic effects for residents and local users, but most of these are then characterised as not significant in combination except in limited circumstances. That does not reflect the real lived experience of this Scheme. For many receptors, the combined burden is not a single topic but an accumulation of overlapping effects: visual industrialisation of the landscape, traffic and HGV movements, driver and pedestrian safety concerns, severance, fear and intimidation on rural lanes and rights of way, noise and vibration, stress and loss of tranquillity, and prolonged uncertainty over construction and decommissioning. South Norfolk Council expressly identified concern about combined construction impacts including traffic, noise, disturbance and pollution, and stated that the significant cumulative impact of East Pye with other NSIPs and TCPA schemes had not been adequately explored.	ES Volume 1, Chapter 19 - In-Combination Effects Assessment [APP-055] assesses the potential for in-combination effects on the surrounding land uses, including places of work and the local road network. It is acknowledged that during the construction, operational, and decommissioning phases, potential individual environmental effects in isolation have been identified which may have an impact on local residents, as well as on people using the local area. Professional judgement has been applied to determine the significance of each in-combination effect identified. The construction programme and lifetime of the Scheme, as defined within Chapter 4, have been considered within the assessment as appropriate. The proposed management and mitigation measures set out in the ES [APP-036 to APP-195] and are secured through various outline management plans [APP-196 to APP-205]. The specificity of the outline management plans will be provided in

ID	Theme	Representation	Applicant's Response
		The chapter also does not properly recognise that some receptors will be exposed to these burdens over a very long period. This is not a brief temporary intrusion. The project is expected to operate for up to 60 years. That duration materially affects the seriousness of any in-combination burden and should have been reflected more fully in the assessment.	the detailed management plans, which will be substantially in accordance with the outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032]. Of particular relevance to the assessment of effects on local communities and mitigation measures are set out in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], Chapter 11 – Transport and Access [APP-047], Chapter 12 – Noise and Vibration [APP-048], Chapter 13 – Air Quality [APP-049], Chapter 14 - Socio-Economics [APP-050], and Chapter 18 - Other Environmental Matters [APP-054]. The Applicant has prepared a Statutory Nuisance Statement [APP-208]. This draws upon the assessment conclusions from Environmental Statement and concludes that the construction, operation and maintenance, and decommissioning of the Scheme would not give rise to any impacts that would constitute a

ID	Theme	Representation	Applicant's Response
			statutory nuisance under Section 79(1) of the Environmental Protection Act 1990.
BEPS-473	Cumulative and In-Combination Effects	Failure to assess combined effects on transport users, rural lanes and rights of way Chapter 19 lists driver and passenger delay, user and pedestrian safety and severance of communities under transport, but then largely reduces the in-combination conclusion for construction / decommissioning to a generic residents/users category. That is inadequate. The Scoping materials themselves recognised potential adverse impacts on PRow access, recreational enjoyment and health and wellbeing, and acknowledged that transport, noise and visual effects could affect resident amenity. The Applicant's own assessment framework therefore recognised that rights of way users and residents could experience multiple interacting harms. A lawful in-combination assessment should have carried that logic through and assessed the combined effect of traffic, noise, vibration, visual change, loss of tranquillity, intimidation and severance on walkers, cyclists, equestrians, children and other vulnerable users of the local network. Further, Chapter 19 itself cites EN-3's expectation that cumulative effects on the local road network and residential amenity may require coordinated management of abnormal	ES Volume 1, Chapter 11 - Transport and Access [APP-047] and ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to 177] assess the effects of construction traffic on the Local Highway Network, including cumulative effects with other developments. The cumulative developments included within the transport assessment were agreed with Norfolk County Council as the Local Highway Authority. Effects on PRow users has also been considered. An Outline PRowPMP [APP-203] has been prepared which identifies affected routes and sets out management measures to minimise impacts during the construction phase. Any PRow subject to temporary closure or diversion will be reopened following the completion of construction activities in that respective area.

ID	Theme	Representation	Applicant's Response
		loads and deliveries across multiple solar farm developments. Yet the chapter does not demonstrate any robust assessment of how East Pye's traffic-related harms interact with the wider cluster of surrounding schemes or with the wider cumulative traffic context identified by the authorities.	Cumulative traffic effects, including those associated with AILs, are assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047]. This is accompanied by an AIL report, alongside site access design, visibility splays and swept-path analysis to assess suitability for access to each site. This is included within Appendix C and D of the ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to 177]. The Applicant therefore considers that the transport effects on highway users, PRoW users and cumulative traffic conditions have been appropriately assessed and mitigated. Human health has been assessed in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] and considers human health in relation to transport and access, noise, air quality, PRoW, socio-economics, and landscape and visual effects. Mental health has also been considered, as presented in

ID	Theme	Representation	Applicant's Response
			the Equality Impact Assessment [APP-214] .
BEPS-474	Cumulative and In-Combination Effects	Failure to assess combined effects on water, flooding and private water supplies One of the clearest deficiencies in Chapter 19 is its failure to grapple with the interaction between water-related impacts. The chapter references only 'water supply and demand' and 'water quality' at a high level and does not properly assess the combined burdens that may arise where water resources, flood risk, groundwater pathways, contamination risks, private abstractions, BESS-related pollution risks and crossing works interact on the same receptor or location. The Scoping Opinion required assessment of water resources, flood risk, WFD issues and private water supplies, and specifically noted that private water supplies within 250 m needed proper identification and impact assessment. It also required the FRA to consider off-site flood impacts and the potential for the solar installation to increase runoff rates. The LLFA then went further, stressing that proposed but unconsented schemes should be included because similar schemes may be constructed at the same time, with particular relevance to flood risk and downstream impacts. The LLFA also criticised the inadequacy of the flood risk and drainage work, including lack of consideration of historic flood incidents and the interaction with local flood management schemes.	ES Volume 1, Chapter 9 – Water Environment [APP-045] considers the effects on the Water Environment as a result of the Scheme, with identified receptors including hydrological receptors (watercourses and designated sites), hydrogeological (aquifers, groundwater dependent terrestrial ecosystems, bedrock/superficial deposits), public/private water supplies, water resource zones, and source protection zones (private water supplies). The embedded mitigation set out in this chapter and Section 8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] demonstrates that the Scheme will not give rise to significant impacts with the exception of the cessation of agricultural use which is a Major Significant Beneficial impact.

ID	Theme	Representation	Applicant's Response
		In those circumstances, Chapter 19 should have squarely assessed combined effects on water receptors such as: flood-prone settlements downstream of the sites; users of private supplies; receptors exposed to both hydrological and contamination risks; and sensitive chalk stream and waterbody environments exposed to multiple interacting pressures. It does not do so.	
BEPS-475	Cumulative and In-Combination Effects	Failure to assess combined effects on heritage assets, conservation areas and historic landscape Chapter 19 treats heritage in an unduly dismissive way. It states that visual impacts and changes to heritage setting in combination are not significant for heritage assets and will reduce over time as planting becomes established. That is not an adequate in-combination analysis for a project affecting a very large number of designated and non-designated assets across a dispersed historic landscape. The Scoping Opinion required assessment of impacts to several conservation areas that the applicant had proposed to scope out, because intervisibility was shown and insufficient justification had been given for excluding them. It also required assessment of night-time lighting effects, visual effects beyond 2 km and the wider landscape and visual implications of the scheme. Where multiple effects interact on the same heritage receptor — for example visual industrialisation, change to setting, traffic through historic lanes or conservation areas, lighting, infrastructure	Assessment of Conservation Areas first began with desk study, viewshed analysis, and then site visits in order to determine which conservation areas would require further assessment. This approach is the one recommended within the Historic England's guidance documents <i>The Setting of Heritage Assets</i> (HE 2017), <i>Managing Significance in Decision-Taking in the Historic Environment</i> (HE 2015), and <i>Statements of Heritage Significance</i>. <i>Analysing Significance in Heritage Assets</i> (HE 2019). Conservation areas were only scoped out following the site visits once, using professional judgement, it was determined that the Scheme would result in no impact to their character and appearance, including any contribution from setting. The Applicant notes that the

ID	Theme	Representation	Applicant's Response
		prominence and cumulative change with other schemes — Chapter 19 should identify and assess that combined effect explicitly. It does not. This is especially important because the wider record repeatedly identifies heritage and historic landscape as one of the principal areas of concern, including conservation areas, listed churches, the South Norfolk Claylands and the cumulative erosion of local distinctiveness. Chapter 19 does not provide a convincing synthesis of those interacting harms.	methodology employed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and its supporting document ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168] were agreed with all statutory consultees at PEIR stage, and in Historic England's recent S.56 Response (Ref. PL00797992), they will be commenting upon impacts to the four Conservation Areas that were assessed more fully within the ES Chapter. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] has considered: the impacts upon heritage assets as a result of traffic and piling vibration; indirect impacts on the significance of heritage assets brought about by changes to their setting; and cumulative effects with other existing and approved developments. ES Volume 1, Chapter 19 - In-Combination Effects Assessment [APP-055] provides an assessment of in-combination effects, where receptors are subject to residual effects under more than one

ID	Theme	Representation	Applicant's Response
			environmental topic. In-combination effects have been considered during construction, operation, and decommissioning phases of the Scheme. This assessment concluded that there is the potential for in-combination effects on heritage assets during the construction and decommissioning phases of works, largely relating to the setting of built-heritage assets; however, the in-combination effect is anticipated to be minor negative. During the operational phase of the Scheme, the assessment identifies up to minor adverse effects upon certain heritage assets; however, the in-combination effects are considered to not be significant and will reduce throughout the operational phase as landscape mitigation becomes more established.
BEPS-476	Cumulative and In-Combination Effects	The chapter does not adequately reflect the broader cumulative context in South Norfolk Although Chapter 19 distinguishes 'in-combination' from 'cumulative' effects, that distinction does not justify ignoring the real development context within which the Scheme's effects will be experienced.	The Applicant is aware of other projects in the region. The ES [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an

ID	Theme	Representation	Applicant's Response
		South Norfolk Council stated plainly that the significant cumulative impact of East Pye together with Tasway Energy Park, Norwich to Tilbury pylons and other consented and proposed schemes had not been adequately explored and was a matter of serious concern. Norfolk County Council also raised concern about the cumulative impacts of this proposal sitting alongside other approved and proposed NSIPs in South Norfolk and other energy-related development in the area, including Hornsea Three works and Norwich to Tilbury, and stated that there needed to be a cumulative impact assessment considering Tasway and BESS infrastructure proposed under the TCPA. The LLFA similarly supported inclusion of proposed but unconsented schemes because of the large number of similar solar and BESS schemes in the area and the likelihood that they may be constructed on similar programmes. Chapter 19 does not convincingly show that the effect interactions it identifies have been assessed in a way that is grounded in that wider reality. For residents and communities, the in-combination burden of East Pye cannot sensibly be divorced from the other major schemes that may affect the same road network, same rural character, same landscape, same settlements and same environmental receptors.	increased effect on the receptors presented in the ES. The Applicant has sought to assess all cumulate schemes in accordance with <i>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017</i> (the EIA Regulations) and the Planning Inspectorate's <i>Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment</i>. The EIA Regulations require the assessment to take into account '<i>the cumulation of effects with other existing and/or approved projects...</i>' (Schedule 4, paragraph 5(e)) and the same is required by the Planning Inspectorate's <i>Advice on Cumulative Effects Assessment</i>. The Applicant understands that the Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorates website as a DCO project. If this position changes during Examination and further information becomes available then the Applicant

ID	Theme	Representation	Applicant's Response
			will update its cumulative effects assessment accordingly Should the Tasway Energy Park project ever proceed, the cumulative effects of the East Pye Solar and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders to understand and, where possible, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination.

ID	Theme	Representation	Applicant's Response
BEPS-477	Cumulative and In-Combination Effects	The operational conclusions on ecological benefits are overstated and one-sided Chapter 19 concludes that ecologically designated sites and priority habitats will experience significant beneficial in-combination effects during operation because of the cessation of agricultural activities and reduced application of fertilisers and chemicals, with associated beneficial water quality effects. It also concludes that ecology and climate change together are not anticipated to have a significant in-combination effect because the Scheme will reduce national greenhouse gas emissions and habitat mitigation is proposed. Those conclusions are presented with too much certainty. They assume that ecological mitigation, landscape establishment and long-term management will function exactly as intended across a 60-year lifespan; they assume that there are no offsetting harms from other operational effects such as lighting, maintenance activity, disturbance, hydrological change or unforeseen deterioration in habitat condition; and they downplay the extent to which the ecology case elsewhere in the record has been disputed and called incomplete. A lawful in-combination chapter should present a balanced assessment of both potential gains and constraints. Here, the claimed beneficial case is overstated, while the interacting adverse effects across ecology, hydrology and wider environmental change are understated.	The assessment presented in ES Volume 1, Chapter 19 - In-Combination Effects Assessment [APP-055] is informed by the detailed assessments set out within other technical chapters. The assessment of significant effects to biodiversity receptors, including designated sites, sensitive habitats, watercourses, protected and priority species, is set out in detail within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The assessment within Chapter 8 follows industry standards (Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (V 1.3)). Operational mitigation measures are detailed within the Outline LEMP [APP-199], with further detail to be provided within the final LEMP (secured by Requirement 7 of the Draft DCO [AS-032]). Proposed mitigation is based on standard industry approaches, with a high certainty of success, and with

ID	Theme	Representation	Applicant's Response
			measures in place to manage and monitor.
BEPS-478	Cumulative and In-Combination Effects	Overall conclusion on Chapter 1G For all of these reasons, Chapter 19 materially under-assesses the in-combination effects of East Pye Solar. Its methodology is too narrow. Its receptor groups are implausibly limited. Its conclusions depend too heavily on contested underlying chapters. It fails to identify and analyse the true overlapping burdens on residents, transport users, water receptors, private water supplies, heritage assets, conservation areas and rural communities. It also fails to show, with adequate clarity, how these effects overlap spatially and temporally across a large, dispersed and long-duration NSIP. The result is an assessment that does not meet the standard required by the EIA Regulations, national policy or the Planning Inspectorate's own scoping requirements. Remedies sought The Applicant should be required to revise Chapter 19 so that it: identifies all genuinely shared receptors across the Scheme; assesses interactions spatially and temporally rather than by abstract summary alone; includes the effects of reasonably foreseeable surrounding NSIPs, solar and BESS schemes and other relevant infrastructure; and specifically evaluates the combined burdens on residents, non-motorised users, private water supply users, heritage	The Applicant refers to its response to BEPS-465-477. For these reasons, the Applicant does not intend to update Chapter 19 in this regard.

ID	Theme	Representation	Applicant's Response
		assets, conservation areas, rural businesses, flood-sensitive communities and sensitive ecological corridors. In the absence of that further work, the Examining Authority should conclude that the cumulative and in-combination effects of the Scheme have not been properly identified, described or assessed.	
BEPS-479	Summary of Residual Significant Effects	Chapter 20 – Summary of Residual Significant Effects Introduction The Applicant's Chapter 20 is not a neutral administrative summary. It is the document that purports to present, in consolidated form, the final environmental balance of the Scheme after mitigation, and therefore the point at which the Secretary of State and Examining Authority are invited to accept the Applicant's case on residual harm. That makes it a critical chapter. Where the underlying assessments are incomplete, disputed, dependent on outline mitigation, or rely on optimistic assumptions, those weaknesses are imported directly into Chapter 20. The chapter itself confirms that it is only a summary of the residual effects identified elsewhere, and that the conclusions are based on the information available at the time and may in some cases reflect a 'reasonable worst-case' scenario. The principal objection is that Chapter 20 materially understates the true residual harm of the Scheme,	ES Volume 1, Chapter 20 – Summary of Significant Residual Effects [APP-056] summarises the significant residual effects of the Scheme. Residual effects are defined as those effects that remain following the implementation of embedded and additional mitigation measures. Residual effects and mitigation measures are discussed in full in the relevant technical chapters [APP-042 – APP-054]. The relevant technical chapters provide detail on the assessment methodologies, assumptions and limitations, and mitigation measures. The proposed management and mitigation measures set out in the ES [APP-036 to APP-195] are comprehensive and robust and are secured through various outline management plans [APP-196 to APP-205]. The specificity of the

ID	Theme	Representation	Applicant's Response
		overstates confidence in findings of non-significant effect, and presents a false impression of environmental certainty in circumstances where many of the most important issues remain contested, inadequately evidenced, or dependent on later-stage control documents rather than fixed design and assessed mitigation.	outline management plans will be provided in the detailed management plans, which will be substantially in accordance with the outline management plans, that will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032] .
BEPS-480	Summary of Residual Significant Effects	Chapter 20 reveals the true scale of admitted landscape and visual harm Chapter 20 is striking in the extent of significant adverse landscape and visual effects it expressly records during construction. It identifies moderate and major adverse effects on a large number of landscape receptors, including the Via Beata long distance walking route, National Character Area 83 South Norfolk and High Suffolk Claylands, LCA A1 Tas Rural River Valley, LCA B1 Tas Tributary Farmland, LCA B5 Chet Tributary Farmland, LCA C2 Thurlton Tributary Farmland with Parkland, and LCA E2 Great Moulton Plateau Farmland. It also records major adverse effects on the landscape character and features of Site 1, Site 7 and Site 8, alongside further moderate adverse effects across multiple sites and cable route corridor areas.	The Applicant acknowledges the significant adverse effect identified. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the Design Approach Document [APP-212]. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing existing hedgerows (infill

ID	Theme	Representation	Applicant's Response
		These are not isolated or localised effects. They amount to a broad acknowledgement by the Applicant that the Scheme would impose substantial and significant adverse change on the character and visual experience of an extensive rural landscape over a wide geographical area. Far from supporting the acceptability of the Scheme, Chapter 20 supports the opposite conclusion: namely, that the Scheme is out of scale with its receiving landscape, that its effects are dispersed across numerous character areas and receptors, and that the harm is intrinsic to the project's size, fragmentation and siting rather than merely incidental.	planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032]. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.

ID	Theme	Representation	Applicant's Response
BEPS-481	Summary of Residual Significant Effects	The chapter presents an artificially simplified picture of non-significant effects Set against those extensive admissions of significant landscape and visual harm, Chapter 20 then presents a broad series of conclusions that there are no significant residual effects for many other environmental topics during construction, including ecology and biodiversity, water environment, cultural heritage, transport and access, noise and vibration, air quality, ground conditions, electric and magnetic fields, and other environmental matters. Those compressed conclusions are objectionable because they reduce numerous complex, contested and evidence-dependent topic areas into formulaic statements of 'no significant residual effect'. They do not adequately convey the extent to which the underlying topic chapters depend on assumptions about outline plans, future approvals, management documents, embedded mitigation that has not been tested in detailed form, or unresolved baseline uncertainty. Chapter 20 therefore creates a false impression of confidence and closure. It is not enough for the Applicant to summarise disputed assessments as settled conclusions. Where the underlying evidence base remains incomplete, where important effects have been minimised by methodology, or where mitigation is deferred, the summary cannot safely be treated as a reliable statement of the Scheme's actual residual environmental impact.	The Applicant refers to its response to BEPS-479.

ID	Theme	Representation	Applicant's Response
BEPS-482	Summary of Residual Significant Effects	The treatment of cultural heritage is not credible. Chapter 20 records no significant residual effects on cultural heritage during construction and no significant residual effects during operation and maintenance. Those conclusions are not accepted. The absence of any significant residual heritage effect in the summary chapter does not sit with the extensive heritage concerns raised elsewhere in the project material, including the large number of designated assets affected and the acknowledged need for heritage assessment across a wide and sensitive historic landscape. The Applicant's own broader objection material refers to the settings of approximately 150 listed buildings and five conservation areas as affected by the Scheme. Chapter 20 appears, in substance, to erase heritage harm at the very point where the overall planning balance is meant to be drawn together. That is not a lawful or robust approach to heritage assessment. A summary chapter should fairly reflect heritage harm where the Scheme affects the setting of designated assets across multiple sites, villages and routes. It should not convert a contested evaluative judgment into an apparently settled conclusion of no significance simply because the methodology adopted in the topic chapter has been narrow, selective or insufficiently precautionary.	ES Volume 1, Chapter 20 Summary of Significant Residual Effects [APP-056] summarises the significant residual effects of the Scheme. The cultural heritage assessment is presented within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168], and the Applicant considers that these assessments have been undertaken in accordance with the appropriate legislation, policies and guidelines and is robust and appropriate for the assessment of the Scheme.

ID	Theme	Representation	Applicant's Response
BEPS-483	Summary of Residual Significant Effects	The chapter overstates ecological benefit and understates ecological risk, and harm to European Protected Species Chapter 20 states, with no evidence, that there are no significant residual effects on ecology and biodiversity during construction. It then goes on to present operation and maintenance as producing a series of beneficial ecological outcomes, including moderate beneficial effects for habitats and species such as native hedgerows, ponds, rivers, woodland, scrub, grassland, ditches, skylark, bats, badger and water vole/otter, and a major beneficial hydrological effect arising from reduced agricultural chemicals and nutrient loading. This is objectionable for two reasons. First, it understates construction and operation risk by presenting ecology as effectively resolved at the summary stage despite the Scheme's interaction with sensitive habitats, watercourses, protected and priority species, and extensive cable and access infrastructure. Second, it completely ignores real ecological harm and adopts an unduly optimistic narrative of operational ecological benefit. The apparent assumption is that converting intensively farmed land into a long-term solar scheme with associated management interventions will necessarily produce a net ecological gain of sufficient certainty to justify significant weight in the planning balance. That assumption is not warranted. The ecological case across this Scheme has consistently raised issues of	ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056] presents a summary of residual significant effects identified within the ES. The assessment of significant effects to biodiversity receptors, including sensitive habitats, watercourses, protected and priority species, is set out in detail within ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]. The assessment within Chapter 8 follows industry standards (Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (V 1.3)). As set out in Section 8.8 of ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], the Scheme has adopted the mitigation hierarchy, and impacts to important ecological features have been avoided where possible. Where mitigation has been proposed, these are standard measures with a

ID	Theme	Representation	Applicant's Response
		avoidance, constraint and uncertainty, not merely enhancement. Where important ecological receptors, Annex II European Protected Species, hydrological pathways and habitat functions are sensitive or incompletely understood, the mitigation hierarchy should be applied with extreme caution. Chapter 20 instead appears to treat speculative or management-dependent ecological benefit as if it were a secure and decisive residual outcome. That is not a robust basis for decision-making.	high certainty of success and secured within the Draft DCO [AS-032] .
BEPS-484	Summary of Residual Significant Effects	The water environment conclusions are unbalanced and misleading Chapter 20 states that there are no significant residual effects on the water environment during construction. It then claims a major beneficial operational hydrological effect resulting from reduced agricultural chemicals and nutrient loading and identifies a significant cumulative beneficial effect on water quality with other solar schemes. Those conclusions are not accepted. They are unbalanced because they recast the removal or reduction of agricultural production as an environmental benefit while failing properly to reflect the Scheme's own water-related risks, impacts and uncertainties. This is especially troubling considering the applicant's limited understanding of the water environment has been from desk based studies, with little to no actual hydrological/hydrogeological modelling or actual survey work. A summary chapter should not elevate	ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [APP-056] presents a summary of residual significant effects identified within the ES. The assessment of significant effects to water receptors, including sensitive habitats, watercourses and water supplies, is set out in detail within ES Volume 1, Chapter 9 – Water Environment [APP-045]. As set out in Section 9.8 of ES Volume 1, Chapter 9 – Water Environment [APP-045], the Scheme has embedded flood risk and pollution management mitigation as set out and secured within the Outline CEMP

ID	Theme	Representation	Applicant's Response
		one claimed operational benefit into a major positive effect while downplaying or neutralising concerns relating to chalk stream crossings, private water supplies, groundwater pathways, flood risk, contamination risk, cable installation, trenchless crossings, BESS-related pollution risk and hydrological change. The chapter therefore presents a distorted residual water balance. It assumes that the reduction of existing agricultural inputs is environmentally determinative, while marginalising the possibility that the Scheme itself may introduce long-term, hard-to-reverse or poorly understood risks to the water environment. That is particularly inappropriate in a Scheme of this scale and complexity, spanning multiple sites and water-sensitive locations.	[APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Where mitigation has been proposed, these are standard measures with a high certainty of success, and secured within the Draft DCO [AS-023].
BEPS-485	Summary of Residual Significant Effects	The cumulative assessment is incomplete and underplays real cumulative burden Chapter 20 states that the cumulative effects assessment is summarised in Table 20.4. However, the chapter records that cumulative landscape effects during short-term construction and decommissioning have not been considered because overlap between the construction periods of East Pye Solar and other schemes is unclear. That is not a satisfactory basis on which to exclude cumulative construction effects. South Norfolk is already subject to multiple actual and proposed energy and infrastructure projects, and the possibility of overlap in construction effects is plainly a realistic one. Local authority	ES Volume 1, Chapter 20 Summary of Significant Residual Effects [APP-056] summarises the cumulative effects of the Scheme. The assessment of cumulative effects are discussed in full in the relevant technical chapters [APP-042 – APP-054]. The cumulative landscape and visual effects assessment is considered to be a proportionate approach.

ID	Theme	Representation	Applicant's Response
		responses have repeatedly identified concern about cumulative effects from East Pye in combination with other energy projects and infrastructure proposals in the district and wider area. In that context, uncertainty about timing is not a reason to omit cumulative assessment. It is a reason to assess conservatively. Even where cumulative effects are addressed, the chapter appears to understate them. It records no likely significant cumulative effects for ecology and biodiversity, no likely significant cumulative effects for construction and decommissioning in the water environment, and only limited operational cumulative landscape effects on certain rights of way and residential receptors. Given the broader evidence of multiple schemes in and around South Norfolk, that conclusion appears selective and insufficiently precautionary. It does not reflect the real cumulative burden experienced by communities, landscapes, heritage assets and environmental receptors when very large projects are promoted in close succession or in overlapping zones of influence.	
BEPS-486	Summary of Residual Significant Effects	BMV agricultural land One of the most significant admissions in Chapter 20 is its identification of a long-term moderate adverse effect in relation to Best and Most Versatile agricultural land through irreversible loss or downgrading. That point should be given substantial weight.	The Applicant acknowledge the significant adverse effect identified. As set out within ES Volume 1, Chapter 15 Soils and Agricultural Land [APP-051], BESS and Project Substations are likely to be restorable, however a worst-case assessment has been undertaken that assumes BESS and

ID	Theme	Representation	Applicant's Response
		This is not a mere temporary construction inconvenience. The summary chapter expressly recognises long-term and irreversible harm to productive agricultural land. That is particularly significant in the context of a project with an operational life anticipated to extend up to 60 years, and in a district already facing cumulative pressure from other major schemes. South Norfolk Council has itself highlighted concern about the loss of high-quality agricultural land and the cumulative implications of such loss. The summary chapter therefore contains a direct admission that the Scheme would result in enduring harm to an important national resource. That harm cannot be dismissed as transient or easily reversible, and it weighs materially against the Scheme in the overall planning balance.	Project Substations are not fully restorable, and that mitigation planting is a permanent loss. BMV land was considered during site selection, along with previously developed land and rooftops, as reported in the Site Selection Assessment [APP-215]. 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]. ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] presents an assessment on agricultural land quality, soils, local agricultural businesses, food production and the rural economy, including consideration of the economic and other benefits of BMV land, in accordance with planning policy. In accordance with the Outline SRMP [APP-204] that includes measures to manage soils as a resource and minimise adverse impacts, a detailed SRMP will be submitted to and approved by the

ID	Theme	Representation	Applicant's Response
			relevant planning authority, as secured by a Requirement 18 in the Draft DCO [AS-032] .
BEPS-487	Summary of Residual Significant Effects	The summary chapter reflects a wider pattern of minimisation from scoping to assessment Chapter 20 must also be read in light of the Scheme's earlier scoping history. The original scoping approach proposed to scope out or minimise a number of matters that later became significant areas of dispute, including water environment, electric and magnetic fields, waste and materials, socio-economics, human health and ground conditions. The Planning Inspectorate's Scoping Opinion did not accept many of those exclusions and required further assessment in several areas. Chapter 20 therefore appears to represent the end-point of an assessment process in which topics initially treated as peripheral or non-significant have ultimately re-emerged only to be compressed into summary conclusions of no significant residual effect. That raises a legitimate concern that the chapter is not simply summarising the environmental evidence, but perpetuating a methodological pattern of minimisation. Where the Inspectorate previously required fuller assessment because significant effects could not be ruled out, it is not sufficient for the Applicant now simply to declare those same matters non-significant in a summary table without transparently addressing the basis for that shift.	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]). ES Volume 1, Chapter 20 - Summary of Significant Residual Effects [APP-056] summarises the significant residual effects of the Scheme. Residual effects are defined as those effects that remain following the implementation of embedded and additional mitigation measures. Residual effects and mitigation measures are discussed in full in the relevant technical chapters [APP-042 – APP-054]

ID	Theme	Representation	Applicant's Response
BEPS-488	Summary of Residual Significant Effects	Overall conclusion to Chapter 20 Chapter 20 does not provide a reliable or fair summary of the Scheme's true residual environmental effects. It correctly reveals extensive and significant adverse landscape and visual harm, but then adopts an unjustifiably confident and simplified approach to many other topics, including heritage, ecology, water, cumulative effects and agricultural land. It presents contested judgments as settled conclusions, underplays uncertainty, and gives undue prominence to asserted operational benefits while failing properly to reflect enduring and unresolved environmental risk For those reasons, Chapter 20 should not be treated as an objective or complete statement of the Scheme's residual effects. It is instead a contested document that materially understates harm and therefore distorts the overall planning balance. Remedies sought The Examining Authority is requested to give Chapter 20 limited weight unless and until the Applicant demonstrates, by reference to complete, robust and fully tested underlying assessments, that its summary conclusions are justified. In particular, the Applicant should be required to revise Chapter 20 so that it accurately reflects disputed and potentially significant residual effects on cultural heritage, ecology, water environment, cumulative impacts and agricultural land, and so that it does not present outline	The Applicant considers that ES Volume 1, Chapter 20 - Summary of Significant Residual Effects [APP-056] provides an accurate summary of the Scheme's residual significant effects, which are detailed within the relevant technical chapters [APP-042 – APP-054].

ID	Theme	Representation	Applicant's Response
		mitigation or management-dependent assumptions as settled outcomes. If those matters cannot be satisfactorily resolved, the Secretary of State is respectfully requested to refuse development consent on the basis that the Scheme's true residual adverse effects are materially greater, more uncertain and more widespread than Chapter 20 acknowledges.	
BEPS-489	Non-Technical Summary of Environment Statement	Accessibility of Documents The Non-Technical Summary is not a reliable standalone guide to the true evidential position BEPS is concerned that the Environmental Statement Non-Technical Summary ('NTS') is not a fully fair or representative account of the underlying ES chapters and appendices. While it broadly follows the chapter structure and reproduces the applicant's preferred conclusions, it repeatedly presents matters as controlled by 'embedded mitigation', 'not significant', or otherwise resolved, where the underlying application documents show continued dependence on deferred surveys, deferred design, outline plans, later licences, later agreements and later approvals. In BEPS's submission, the NTS therefore risks understating uncertainty, contingency and unresolved environmental risk. This concern is reinforced by the applicant's own Commitments Register, which expressly states that it 'is not a secured document' and serves only as a register	The Non-Technical Summary [APP-166] summarises the findings of the Environmental Statement in a form accessible to interested parties, in accordance with the EIA Regulations. The proposed management and mitigation measures set out in the ES [APP-036 to APP-195] are comprehensive and robust. The Applicant refers to its response to BEPS-071 – BEPS-080 regarding the commitments register.

ID	Theme	Representation	Applicant's Response
		intended to track commitments through to other purported securing mechanisms. The wider application documents also show that many important controls still depend on later consents, licences and agreements, including environmental permits, protected species licensing, highway approvals and other approvals outside the DCO itself. The Funding Statement likewise identifies no ring-fenced, insolvency-proof financial security for decommissioning or restoration, despite the NTS presenting decommissioning and restoration in simplified and reassuring terms. In particular, BEPS considers that the NTS tends to smooth over important unresolved issues in relation to protected species and licensing, water environment and private water supply risk, transport and replacement traffic, operational noise mitigation, ground conditions, decommissioning and the true degree of reliance on later management plans and future approvals. In BEPS's submission, the Examining Authority should therefore treat the NTS with caution and should not regard it as a neutral or complete summary of environmental acceptability. The underlying ES chapters, appendices and control documents reveal a much more contingent and less resolved position than the NTS suggests.	
BEPS-490	Statement of Need	Overall planning balance and remedies sought BEPS' summary position is that the Scheme fails the planning balance. The applicant has not demonstrated a	The Applicant has responded to these summary representations in detail in the rows above.

ID	Theme	Representation	Applicant's Response
		compelling need for East Pye Solar in this location or region. It has not shown that less harmful alternatives have been properly assessed. It has not resolved gateway legal issues relating to protected species, Habitats Regulations, the Water Framework Directive, private water supplies, contamination, heritage protection and procedural fairness. It has not demonstrated that the most serious harms are capable of mitigation. BEPS submits that this application cannot lawfully proceed without further environmental information, corrected assessment, re-consultation where necessary, and enforceable safeguards sufficient to demonstrate compliance with all relevant legal gateway tests. Further information should not be used merely to patch evidential gaps after the principle of development has effectively been accepted. At minimum these should include lawful alternatives assessment, complete ecological (including botany, whiter-clawed crayfish and bat) surveys, a robust Habitats Regulations assessment, Water Framework Directive compliance assessment, hydrogeological and private water supply risk assessments, contamination pathway modelling, corrected cumulative assessment, winter and representative visual material, aviation safety assessment acceptable to Tibenham Airfield and GAAC, enforceable decommissioning and restoration security, and full disclosure of DESNZ/Macquarie engagement relevant to grid connection, need and project facilitation.	The Applicant refers to its response to BEPS-002.

ID	Theme	Representation	Applicant's Response
		For the reasons set out in this representation, BEPS submits that East Pye Solar is not an acceptable or lawful development. BEPS therefore asks the Examining Authority and the Secretary of State to refuse development consent.	
<u>BEPS – Misleading Site Selection Assessment</u>			
BEPS-491	Site Selection Assessment Soils and Agriculture	The mapping in the site selection assessment document (7.20) is inconsistent and misleading. In the earlier mapping, especially Figure 8, the large brown/beige area is labelled as 'Unconstrained Land, Including ALC Grade 3 (<3% Gradient)'. That map shows that, once Grade 3 agricultural land is included, there is a very large area of apparently suitable or at least potentially developable land within the search area. The report says Figure 8 shows unconstrained land after 'removing the exclusion' of unclassified Grade 3 land, because use of Grade 3/potential BMV was considered unavoidable. But then, when they move to the later search around the actual Point of Connection at Great Moulton, Figure 10 maps 'Planning and Environmental Constraints' and Figure 11 then shows only tiny blue areas as 'Unconstrained Land.' The reason is that, at that stage, they have excluded ALC Grades 1–3 from the unconstrained land mapping. The report says expressly that, for Figure 11, 'ALC Grades 1–3 were excluded from this mapping.' The mapping suddenly appears to remove most of the land around Great Moulton/Long Stratton and present only a	The Site Selection Assessment [APP-215] considered Natural England's 1970s Provisional Agricultural Land Classification mapping, which does not differentiate between Grades 3a and 3b. As set out in the responses to preceding representations, at Stage 2 all ALC Grade 1, 2 and 3 land was excluded from the initial search area, consistent with the policy expectation in paragraph 2.10.21 of NPS EN-3 that poorer quality land should be preferred to higher quality land, avoiding the use of Best and Most Versatile (BMV) agricultural land where possible. As set out in Section 5.1 of the Site Selection Assessment [APP-215] and Section 15.6 of ES Volume 1, Chapter 15 – Soils and Agricultural

ID	Theme	Representation	Applicant's Response
		very small remnant as unconstrained. But technically, the reason is using a much narrower definition of 'unconstrained' at the stage of examining alternatives: effectively 'non-Grade 1–3 land and not otherwise constrained'. On this basis, the land for East Pye Solar should have been regarded as 'constrained' and unsuitable as, even by the applicant's own analysis, they are on around 80% ALC grades 1-3 land.	Land [APP-051], given the extent of Grade 3 (and above) land across the search area, the use of some Grade 3 land — potentially including BMV — was considered to be unavoidable in accordance with paragraph 2.10.23 of NPS EN-3, which recognises that at the scale of NSIP solar development it is likely that some agricultural land will be used. The proportion of BMV land in Norfolk is approximately 53% (higher than the national average) and in South Norfolk approximately 42% (equivalent to the national average). Natural England's Likelihood of BMV mapping shows that the Order Limits mostly fall within the lowest category for the likelihood of BMV land in the wider area (moderate likelihood of BMV), and no land was identified as likely to be of a lower quality or overall proportionate lower mix of BMV quality within a reasonable distance of the Point of Connection. Figures 6 and 10 show the application of the initial Stage 2 planning and

ID	Theme	Representation	Applicant's Response
			environmental constraints (which exclude ALC Grades 1, 2 and 3); Figures 7 and 11 show the residual unconstrained land after this exclusion; and Figures 8 and 21 show the effect of subsequently removing the Grade 3 exclusion for the purposes of considering the wider search area at Stages 5 and 6. This reflects the logical and proportionate consideration of Potential Development Areas within non-BMV land in compliance with NPS EN-3. A detailed ALC survey was subsequently undertaken across the Sites, as reported in ES Volume 3, Appendix 15.1 – Agricultural Land Classification Survey [APP-181] and summarised in ES Volume 1, Chapter 15 [APP-051]. This confirmed that BMV quality land within the Sites amounts to 829.1 ha. As noted in the Site Selection Assessment [APP-215] at paragraph 5.1.7, it is highly likely that any alternative sites considered within the 20km search area would have similar levels of BMV land if subject to detailed ALC surveys, given the underlying agricultural land

ID	Theme	Representation	Applicant's Response
			quality of the wider area. Since the ES was published a Predictive Agricultural Land Classification Map for England has been published (Defra, 2026). This predicts that most of Norfolk and the land within 20km of the Point of Connection is of BMV quality and that the Potential Development Areas previously considered as they were Grade 4 ALC land, comprise a mix of BMV land.
BEPS-492	Site Selection Assessment Soils and Agriculture	They accept Grade 3 land for the selected East Pye sites, but when assessing alternatives around the Point of Connection, they initially treat Grade 3 as excluded/constrained, thereby producing an artificially tiny pool of alternatives. Then, only later, they reintroduce Grade 3 land in Stage 6 and acknowledge that doing so introduces 'a significant amount of land' within the 20 km search area that could potentially accommodate solar development. This methodology is inconsistent and potentially self-serving. If Grade 3 land is acceptable for East Pye's selected sites, then it should not be used at the earlier alternatives stage to make alternative areas appear scarce or unsuitable. Conversely, if Grade 3 land is a meaningful constraint, then the applicant must apply that constraint equally to its own selected sites.	As set out in Section 5.1 of the Site Selection Assessment [APP-215] and Section 15.6 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] , given the extent of Grade 3 (and above) land across the search area, the use of some Grade 3 land — potentially including BMV — was considered to be unavoidable in accordance with paragraph 2.10.23 of NPS EN-3, which recognises that at the scale of NSIP solar development it is likely that some agricultural land will be used. The proportion of BMV land in Norfolk is approximately 53% (higher than the national average) and in South Norfolk approximately 42%

ID	Theme	Representation	Applicant's Response
			(equivalent to the national average). The Applicant has sought to reduce the amount of BMV land within the Scheme as far as practicable considering the high proportion of BMV land in Norfolk.
BEPS-493	Site Selection Assessment Soils and Agriculture	There is also a second flaw. The report says the original sites were identified through land agents and willing landowners, and that they did not consider every piece of unconstrained agricultural land because of the large extent involved. That means the 'site selection' is largely a land-availability exercise dressed up as a constraints assessment.	As set out in Section 5.1 of the Site Selection Assessment [APP-215] and Section 15.6 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] . This confirmed that BMV quality land within the Sites amounts to 829.1 ha. As noted in the Site Selection Assessment [APP-215] at paragraph 5.1.7, it is highly likely that any alternative sites considered within the 20km search area would have similar levels of BMV land if subject to detailed ALC surveys, given the underlying agricultural land quality of the wider area.
BEPS-494	Site Selection Assessment Soils and Agriculture	In summary, the mapping uses 'unconstrained land' inconsistently. Grade 3 land is included when justifying the applicant's own selected sites, but excluded when screening for alternatives around the Point of Connection, producing a misleadingly small pool of alternative land. Since the proposed scheme itself relies heavily on Grade 3 land, that exclusion is methodologically inconsistent and	As set out in Section 5.1 of the Site Selection Assessment [APP-215] and Section 15.6 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] , given the extent of Grade 3 (and above) land across the search area, the use of some Grade 3

ID	Theme	Representation	Applicant's Response
		may materially distort the alternatives assessment. It also fundamentally calls in to question the acceptability of the applicant's own scheme which is on around 80% ALC grades 1-3 land.	land — potentially including BMV — was considered to be unavoidable in accordance with paragraph 2.10.23 of NPS EN-3, which recognises that at the scale of NSIP solar development it is likely that some agricultural land will be used. The proportion of BMV land in Norfolk is approximately 53% (higher than the national average) and in South Norfolk approximately 42% (equivalent to the national average). The amount of land within the Order Limits is approximately 0.22% of the agricultural land within Norfolk, and 1.2% of South Norfolk agricultural land. As detailed in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], an ALC survey of the Sites was undertaken, which excluded the CRC. This confirmed that land within the Sites of the Order Limits was a mix of mostly Grades 2 and 3a, with areas of Grade 3b, and small areas of Grade 4. BMV quality land within the Sites amounts to 829.1ha (78.7% of the Sites only; or 68.4% of the Order Limits).

2.4 Cllr John Cook

Table 2.4 Applicant's Response to Cllr John Cook [\[RR-0380\]](#)

ID	Theme	Representation	Applicant's Response
CJC-001	Landscape and Visual	I strongly object to East Pye Solar because of the following reasons The visual impact on south Norfolk landscape will be devastating ruining the rural charm of the idyllic setting of the countryside.	A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Further, a visual amenity assessment of Public Rights of Way is present in ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149] and on residential properties in ES Volume 3, Appendix 7.8 – Residential Visual Amenity Assessment [APP-148]. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the Design Approach Document [APP-212]. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The

ID	Theme	Representation	Applicant's Response
			proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032]. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. The Applicant considers that the Scheme is in accordance with national energy policy, national planning policy, and any relevant development plan when considered as a whole. For the purpose of the Secretary of State decision making National Policy Statement are the primary documents for NSIPs, including this Scheme pursuant to s104 Planning Act 2008.

ID	Theme	Representation	Applicant's Response
CJC-002	Transport and Access Cultural Heritage	I live in a grade 2 listed property the structure could be effected with the large lorry's passing the vibration could effect the integrity of our home.	The Applicant notes the concern raised regarding potential vibration effects on the Grade II listed property from construction vehicle movements. An assessment of construction noise and vibration, including vibration from construction traffic, is presented in ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. An assessment of effects on heritage assets, including listed buildings, is provided in ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]. Construction vehicle routing has been developed in consultation with Norfolk County Council as the Local Highway Authority, with the principal aim of avoiding sensitive heritage assets and the routing of vehicles through local villages, wherever practicable, as set out in the Outline CTMP [APP-201]. Mitigation measures to control noise and vibration during construction are set out in the Outline CEMP [APP-196], with contractors required to ensure that works are carried out in accordance with best practicable means as stipulated in the Control of Pollution Act. Detailed CEMP and CTMP will be submitted to and approved by the relevant planning authority in

ID	Theme	Representation	Applicant's Response
			accordance with Requirements 13 and 15 of the Draft DCO [AS-032] , with the CTMP requiring consultation with the relevant highway authority.
CJC-003	Ecology and Biodiversity	The effects to the wildlife in particular Brown Hares Barbastrall Bats and Barn owls will be devastating the fields are rich in wildlife the fields are utilised for food and nesting It will effect butterflies deer rabbits kestrels sparrow hawks shrews mice etc by this huge loss of habitat.	The likely effects on ecology and biodiversity, including on Barbastelle bats, brown hare, barn owls, other bird species, invertebrates and small mammals, are assessed in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044], informed by species-specific survey reports including ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157] and ES Volume 3, Appendix 8.2 – Invertebrate Survey Report [APP-153]. 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 compensate for effects through the design process, with minimum design offsets applied to watercourses, hedgerows, trees and woodland as secured in the Design Principles, Parameters and Commitments [APP-213]. Perimeter fencing will allow the large majority of native fauna to pass beneath, and green corridors along ditches,

ID	Theme	Representation	Applicant's Response
			hedgerows and their surrounding buffers will allow for the movement of mammals. Mitigation is secured through the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and Outline Protected Species Mitigation Strategy [APP-161], secured through the relevant Requirements of the Draft DCO [AS-032]. The Outline LEMP [APP-199] sets out the long-term management of retained and newly created habitats to benefit foraging and commuting species, including Barbastelle bats, farmland birds, brown hare and invertebrates. The Biodiversity Net Gain Report [APP-218] demonstrates that the Scheme has the potential to deliver 37.42% gain for habitats, 31.35% gain for hedgerows and 16.08% gain for watercourses. BNG of a minimum of 10% gain is secured through Requirement 9 of the Draft DCO [AS-032].
CJC-004	Soils and Agriculture	Food security is a important I understand these panels will be placed on most valuable and versatile land in total 86 percent of this area land is top grade agricultural land.	ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] presents an assessment on agricultural land quality, soils, local agricultural businesses, food production and the rural economy, including consideration of the economic and other benefits of BMV land, in accordance with planning policy.

ID	Theme	Representation	Applicant's Response
			The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely), particularly in the context that the amount of land within the Order Limits is approximately 0.22% of the land within Norfolk, and 1.2% of South Norfolk agricultural land. The UK Solar Roadmap states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.
CJC-005	Socio-Economics	The effect on property prices.	The Applicant notes the concern raised regarding the potential effect of the Scheme on local property values. The Applicant's Book of Reference [APP-022] includes persons who may be eligible to claim compensation if the DCO is granted and the Scheme developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Scheme, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views. This is consistent with established planning law. The Applicant will comply with statutory process for any compensation claims submitted and will review

ID	Theme	Representation	Applicant's Response
			and assess each claim in accordance with the relevant legislation under which it is made. In any event, whilst the Applicant acknowledges that impacts to property prices is a concern for neighbouring residents and businesses, published research and evidence to date does not indicate that solar farms have a significant adverse long-term effect to nearby property values. This is because there is no empirical evidence that industrial scale solar farms cause significant long-term adverse effects on property prices. Whilst it is acknowledged that there have been no known studies of completed >50MW solar Schemes in the UK, studies from the USA and Netherlands do not show any definitive evidence of adverse effects between solar farms and property prices, and conclude that other external factors (such as wider property markets, macroeconomic trends, changes to local services such as schools and healthcare providers) are likely to be more important factors in changes to property prices. Furthermore, there is a difference between short-term troughs in property saleability during peaks in construction activity versus the long-term property value once the Scheme is operating and mitigation set in place.
CJC-006	Transport and Access	The proposal to bring 45 meter 160 Ton Lorries which are 5 meter wide through the	In respect of Saxlingham Nethergate, The Street will not be used for general construction traffic. The only construction traffic expected in Saxlingham

ID	Theme	Representation	Applicant's Response
		conservation village of saxlingham nethergate is ridiculous. The route through Saxlingham Nethergate will affect the war memorial and other grade 2 listed buildings will be devastating. It appeared no one from East Pye has visited the village itself but has processed this all on laptops if they had they would not suggest this as a viable route as it will be destructive to the village and surroundings.	Nethergate will be for the movement of Abnormal Indivisible Loads (AIL). For AIL movements within Norfolk (and Suffolk) there is an existing highway authority embargo against AIL movements during peak traffic times. These restricted times are Monday to Friday 07:00 to 09:00 and 16:00 to 18:00. It is anticipated that the AIL movements would take place during the weekend and during daylight hours to enhance visibility, in accordance with the AIL management measures set out in the Outline CTMP [APP-201]. These commitments will be secured through the detailed CTMP, to be submitted to and approved by the relevant planning authority in accordance with Requirement 15 of the Draft DCO [AS-032]. Each AIL movement will be carefully planned and timed to reduce disruption and undertaken under licence with the Highway Authority to ensure safe operation and to minimise impacts. AIL are not a frequent delivery method and only used for transformers and larger cable drums. The movements will be undertaken using strict traffic management, and notification of these types of movements will be communicated in advance. Requirements for AIL will be determined through the detailed design process and in consultation with statutory consultees. As part of the

ID	Theme	Representation	Applicant's Response
			management of AIL, the selected haulier must notify the police, highway authorities and bridge owners when planning to transport AILs. It is likely that AIL deliveries will require police escorts and/or temporary road closures or diversions on the day of the delivery to maintain the safety of members of the public. An assessment of effects on heritage assets, including listed buildings, war memorials and conservation areas within Saxlingham Nethergate, is provided in ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]. Construction vehicle routes have been selected with the principal aim of avoiding sensitive heritage assets and the routing of vehicles through local villages, wherever practicable. However, it is acknowledged that AIL will pass through Conservation Areas. Mitigation measures relating to construction traffic and AIL are set out in the Outline CTMP [APP-201]. In accordance with Requirement 15 of the Draft DCO [AS-032] a detailed CTMP will be submitted to and approved with the relevant planning authority that must consult with the relevant highway authority.

ID	Theme	Representation	Applicant's Response
			The Applicant can confirm that no part of the registered title of either the Saxlingham Nethergate War Memorial or The Old Rectory falls within the Order Limits. Accordingly, no powers of compulsory acquisition or acquisition of rights are sought over either property and neither title is within the scope of the proposed development works. As set out in the Land Plan [APP-006] page 5 (sheet 3) and the Book of Reference [APP-022] the only land plots in this location for which rights are sought are Plots 03-001 and 03-002. Both plots are located wholly within adopted highway land. No rights are sought over land outside the adopted highway, including any land forming part of the curtilage of the War Memorial or The Old Rectory, for Abnormal Indivisible Load (AIL) movements or any other purpose. Whilst the adjacent public highway may be used on occasion for the movement of AILs, any such movements will be carefully planned and managed in accordance with the Outline CTMP [APP-201] to ensure the protection of nearby assets, including the War Memorial and The Old Rectory.
CJC-007	Consultation and Engagement	It is obvious that Island Green have been through the consultation and survey process ticking boxes and not do not care about the	The Applicant was required, under Section 49(2) of the Planning Act, to have regard to all relevant responses received during statutory consultation

ID	Theme	Representation	Applicant's Response
		reality of the consequences to the area or the people who live here	when finalising the application for development consent. The Consultation Report [APP-024] and its Appendices [APP-025 to APP-034] provide a detailed account of how consultation feedback, including prescribed consultees and public comments, has been considered and, where appropriate, how they have influenced the evolution of the Scheme. Consultation feedback has led to changes to the design through both non-statutory and statutory consultation. 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 Applicant's response to Section 42 feedback is provided in Consultation Report Appendix 11: Section 42 Applicant Response Table [APP-035].
CJC-008	Compulsory Acquisition	They will compulsory purchase the land and after a while sell it off for a huge profit and leave someone else to pick up the mess of	The Applicant confirms that the DCO incorporates enforceable mechanisms to regulate Scheme

ID	Theme	Representation	Applicant's Response
	Funding	ditching the obsolete solar panels which will turn into a ecological nightmare.	delivery. Failure to comply with a DCO Requirement is a criminal offence. The Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, following which a detailed Decommissioning Environmental Management Plan will be prepared substantially in accordance with the Outline DEMP and must be submitted to and approved by the relevant planning authority prior to the commencement of decommissioning. This is secured through Requirement 21 in Schedule 2 of the Draft DCO [AS-032]. 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 as defined in the Draft DCO [AS-032] will remain bound by the legally enforceable requirements in the DCO. Failure to comply with a DCO Requirement would be a criminal offence and there are enforcement mechanisms that would ensure such mitigation would be implemented.
CJC-009	Site Selection, Alternatives and Design Evolution	Concern of how selling off the land after use will then gain permission for building land again ruining the precious south Norfolk countryside.	Once the cable has been laid underground in the Cable Route Corridor during construction, the land will be reinstated and soils restored to the previous condition (as set out in Outline SRMP [APP-2024]), allowing for activities such as farming to continue.

ID	Theme	Representation	Applicant's Response
			The Applicant is seeking a time-limited consent for the Scheme to have an operational period of up to 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 21 in Schedule 2 of the Draft DCO [AS-032]. At the end of the Scheme's operational life, apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned and the land returned to the landowner, as set out in the Outline DEMP [APP-198]. Post-decommissioning, the landowners would choose how the land is to be used and managed.
CJC-010	Soils and Agriculture	Losing precious food production land.	ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] presents an assessment on food production and the rural economy. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely), particularly in the context that the amount of land within the Order Limits is approximately 0.22% of the land within the Norfolk, and 1.2% of South Norfolk agricultural land. Further, the UK Food Security Report concludes that food production levels could be maintained or moderately increased alongside the land use change required to meet net zero. The UK Solar Roadmap states that solar development is not

ID	Theme	Representation	Applicant's Response
			considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.
CJC-011	Battery Safety Major Accidents and Disasters	The development of BESS seems to be underestimated the fire risks. The incident of Carnegie in Liverpool emphasised the in adequacy of fire services proposal and the danger they represent Why would you put solar panels in populated areas near houses many of which are thatched and grade 2 listed It's a clear and obvious danger	The Applicant points out that the Carnegie Road BESS fire involved old generation legacy systems that were not compliant with NFPA 855 (pre-dated) and integrated NMC pouch cell, air-cooled battery systems that will not be considered for the Scheme. The BESS design was a legacy BESS system which had not undertaken Large Scale Fire Testing (LSFT) and was not compliant NFPA 855 or UL 9540 safety standards. This type of system has been involved in approximately a third of BESS failure events listed in the EPRI database. The Applicant has submitted an Outline Battery Safety Management Plan (Outline BSMP) [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). Section 3.1.30 of the Outline BSMP [APP-200] stipulates that: BESS battery systems must integrate: "<i>Battery liquid cooling systems with</i>

ID	Theme	Representation	Applicant's Response
			<i>automated fail-safe operation (air cooling systems will not be considered for the BESS);"</i> The safety objectives for the design of the Applicant's BESS site are listed in Section 1.4 of the Outline BSMP [APP-200]. Section 1.4.2 of the Outline BSMP [APP-200] stipulates: " <i>Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> • <i>To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i>

ID	Theme	Representation	Applicant's Response
			<i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."</i> Section 4 of the Outline BSMP [APP-200] covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in the Outline BSMP [APP-200], Appendix B: Battery Energy Storage System (BESS) Fire – Emissions to Air Risk Assessment) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude

ID	Theme	Representation	Applicant's Response
			that the “<i>proposed development should not result in any significant adverse impact on public health.</i>” The spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred; therefore, this is a credible worst-case scenario. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the oBSMP pre-construction requirements (Section 5). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure fire, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. Sections 5.1.3 – 5.1.6 of the Outline BSMP [APP-200] addresses the requisite risk assessments and consequence modelling that address all credible BESS failure events which will be provided at the detailed design stage. The Applicant will also

ID	Theme	Representation	Applicant's Response
			commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032], which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline BSMP [APP-200]. The Draft DCO [AS-032] also requires the relevant planning authority to consult with Norfolk Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
CJC-012	Human Health	Residents have moved to south Norfolk and this area for the peace tranquilly and countryside This project will harm people's mental health.	Mental health and wellbeing have been assessed within the Equality Impact Assessment [APP-214] and human health in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. Mitigation measures to avoid and reduce environmental impacts have been embedded within the Scheme and are set out in the various management plans, including the Outline CEMP [APP-196], Outline CTMP [APP-201], Outline

ID	Theme	Representation	Applicant's Response
			OEMP [APP-197] and Outline OTMP [APP-202], Outline LEMP [APP-199], Outline ESSC [APP-205] and Outline PRoWPPMP [APP-203].
CJC-013	Statement of Need	The actual benefit of the solar panels in this location on fields are a smoke screen a tick box exercise The negative impacts far outweigh any paper benefit it seems to be a profit-making exercise	As set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1. The Policy Compliance Document [APP-210] further demonstrates the Scheme's compliance with the relevant NPSs and other important and relevant policy. The Statement of Need [APP-206] describes how and why the Scheme addresses all relevant aspects of government policy which support the rapid deployment of low carbon electricity generation at scale, and explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of suitable and available land, suitable irradiation and grid infrastructure with the capacity

ID	Theme	Representation	Applicant's Response
			available to transmit the low carbon energy generated by the Scheme The Applicant is committed to meeting planning and environmental policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all statutory and non-statutory bodies, ensuring quality and accountability throughout.
CJC-014	Site Selection, Alternatives and Design Evolution	Solar panels should not be in fields They should be placed on houses or car parks etc.	The Statement of Need [APP-206] further considers the contribution that rooftop solar or smaller decentralised and community energy schemes can make to meeting electricity demand for domestic and commercial users. However, the data shows that reaching the Government's solar capacity ranges through the deployment of only small-scale schemes is not a feasible pathway to a clean energy system. Therefore, large-scale solar schemes are required to achieve net zero and smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the large-scale solar.

2.5 Cllr Karl Catchpole

Table 2.5 Applicant's response to Cllr Karl Catchpole [\[RR-1016\]](#)

ID	Theme	Representation	Applicant's Response
KC-001	Soils and Agriculture	I oppose East Pye Solar on the basis of the devastation to prime farmland and future food security.	ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] presents an assessment on food production and the rural economy. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely), particularly in the context that the amount of land within the Order Limits is approximately 0.22% of the land within the Norfolk, and 1.2% of South Norfolk agricultural land. The UK Food Security Report concludes that food production levels could be maintained or moderately increased alongside the land use change required to meet net zero. The UK Solar Roadmap states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.

ID	Theme	Representation	Applicant's Response
KC-002	Ecology and Biodiversity	I also oppose due to devastation to the natural habitat of many indigenous species of wildlife.	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], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and Outline Protected Species Mitigation Strategy [APP-161]. The Biodiversity Net Gain Report [APP-218] demonstrates that the Scheme has the potential to deliver the following biodiversity net gain (BNG): • 37.42% gain for habitats; • 31.35% gain for hedgerows; and • 16.08% gain for watercourses.

2.6 Cllr Suzanne Wateridge

Table 2.6 Applicant's response to Cllr Suzanne Wateridge [\[RR-1898\]](#)

ID	Theme	Representation	Applicant's Response
SW-001	General remarks	I am a registered person of interest in three different ways: I am the District Councillor for Great Moulton and Aslacton (both in the Bunwell parish and very much affected by this proposal) as well as a Parish Councillor in Tivetshall and a resident in Tivetshall. I am therefore focusing my submission on these areas (Site 1 and Site 2) rather than the project as a whole.	The Applicant notes this and welcomes further engagement with Councillor Suzanne Wateridge throughout the Examination process.
SW-002	Scheme Description	Before I begin, I would like to express my shock that Tivetshall was not included in the scheme description letter that my husband and I received as residents at the beginning of May 2026. Apart from Great Moulton, I believe that no other village in South Norfolk will be affected as much as Tivetshall will be by the East Pye scheme. These two villages between them will be hosting the majority of the infrastructure, which comprises a 400kv National Grid substation; a 400kv project substation; a 400kv substation and BESS; and	The Applicant has assessed the likely significant effects of the Scheme within the technical chapters of ES Volume 1 [APP-042 to APP-056] and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. Within the ES [APP-036 to APP-195] , the assessments consider the likely significant effects on local communities, where appropriate, within Tivetshall and on specific properties. The extent of the Order Limits is shown on ES Volume 2, Figure 1.1 - Site Location Plan [APP-057] and the maximum extent of the Scheme is shown on the Works Plan [AS-002 and AS-003] .

ID	Theme	Representation	Applicant's Response
		several new pylons (mostly replacing existing but taller). This is a very rural community who will be heavily impacted by this amount of infrastructure in one small area.	Of particular relevance to the assessment more broadly of effects on local communities and mitigation measures are set out in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], Chapter 11 – Transport and Access [APP-047], Chapter 12 – Noise and Vibration [APP-048], Chapter 13 – Air Quality [APP-049], Chapter 14 - Socio-Economics [APP-050], and Chapter 18 - Other Environmental Matters [APP-054] . The proposed management and mitigation measures are secured through various outline management plans [APP-196 to APP-205] .
SW-003	Transport and Access	Transport The road I live on, the B1134, Station Road, Tivetshall, is proposed as the main access for all vehicles connected with the site. Although this makes sense given that it runs directly from the A140 artery, this road is also being proposed as one of National Grid's Norwich to Tilbury haul roads, as the new pylon line will cross the road a couple of miles to the west. If both get approved, then we would have five years of heavy traffic and disruption, with both schemes running mostly concurrently on what is already a very busy road. I would hope that logistical coordination would be	The Applicant notes the concern regarding the potential cumulative effects of the Scheme and National Grid's Norwich to Tilbury project on the B1134 Station Road. The assessment of cumulative effects of construction traffic, including the Norwich to Tilbury project, are detailed within Section 11.11 of ES Volume 1, Chapter 11 - Transport and Access [APP-047] and utilise the information available at the time of the assessment and in agreement with Norfolk County Council. The Norwich to Tilbury project has been included within the assessment, and uses the 2029 peak construction year for

ID	Theme	Representation	Applicant's Response
		carried out by both projects, working together so that the roads do not become gridlocked with lorries.	forecast traffic movements it in order to consider a worst-case scenario. Notwithstanding this, construction traffic associated with the Scheme would be managed in accordance with the Outline CTMP [APP-201], which includes a range of measures designed to manage construction traffic movements and minimise disruption on the local highway network. These include delivery scheduling and monitoring systems, which are intended to distribute deliveries throughout the day, helping to reduce the potential for excessive concentrations of HGVs on the network at any one time and minimise the likelihood of congestion during the construction period. A detailed CTMP will be secured through Requirement 15 of the Draft DCO [AS-032] and will be substantially in accordance with the outline report. As part of this process, the Applicant will liaise with Norwich to Tilbury project teams to coordinate on construction vehicle movements, programme considerations and management and mitigation measures.
SW-004	Transport and Access	The plans point out various 'pinch points' along this road, which are primarily very tight corners where visibility is poor and the road would	The Applicant notes the concern regarding pinch points on the local highway network and the need for appropriate traffic management during the construction period. Construction traffic would be

ID	Theme	Representation	Applicant's Response
		need widening, or vegetation/signs would need removal. It is imperative that there are speed limits in place throughout the construction process as this is a very busy road with people travelling at speed, and not slowing down around corners.	managed in accordance with the Outline CTMP [APP-201], which includes a range of temporary traffic management measures. As set out in Paragraph 7.9.1, these measures may include speed management measures where required to maintain highway safety. In addition, Paragraph 7.9.2 of the Outline CTMP [APP-201] states that the detailed Construction Traffic Management Plan, secured through requirement of the Draft DCO [AS-032] and prepared following detailed design and prior to commencement, will incorporate mechanisms to allow traffic management measures to be adjusted and refined to reflect road conditions, road use and stakeholder feedback. This would ensure that appropriate traffic management measures can be implemented and adapted, where necessary, throughout the construction period.
SW-005	Transport and Access	I would also hope that it is obvious where it makes sense to widen the road and where it does not. For example, our house (REDACTED) has mature trees, hedges and outbuildings, not to mention a drainage ditch, close to the left-hand side of the road. Our drive here also has very minimal splay which already makes it very dangerous. This could not be	The Applicant notes the concern regarding the potential location of any highway improvements required to accommodate construction traffic. Any temporary traffic management measures or localised highway works required during the construction period would be developed having regard to local conditions, including existing highway features, access requirements, vegetation, drainage features and adjoining land

ID	Theme	Representation	Applicant's Response
		reduced in any way. On the opposite side of the road is a farmer's field which does not have crops and is not used for animal grazing. There is ample room to widen the corner on this side and that is what I hope would be done. This would actually be very helpful for us in the long term as it is currently very dangerous trying to see traffic coming from this direction as we turn out of our drive	uses. Site access design, visibility splays and swept-path analysis has additionally been undertaken to evidence suitability of the proposed access routes, and these are detailed in Appendix C of the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]. As set out in Paragraph 7.9.2 of the Outline CTMP [APP-201], the detailed Construction Traffic Management Plan would be prepared following detailed design and prior to commencement, and would allow traffic management measures to be refined to reflect local conditions and road use. This process would ensure that any measures required are appropriately designed having regard to the characteristics and constraints of the location concerned.
SW-006	Transport and Access	Station Road is lined along the stretch between Lodge Road and the BESS site with some beautiful, healthy veteran trees. There is no need for any of these trees to be removed. Finally, the more recent HGV route that has been proposed to access the changed National Grid Substation site in Great Moulton is completely unsuitable. Lodge	The Applicant notes the concern regarding veteran trees located along Station Road and the suitability of Lodge Road and Frith Way for construction traffic accessing the National Grid Substation and BESS. The Applicant is seeking to avoid the removal of trees wherever practicable and any vegetation clearance would be minimised as far as possible through the detailed design process. As such, any tree removal required to facilitate construction

ID	Theme	Representation	Applicant's Response
		Road and Frith Way are single track roads, with very few passing points.	access would be limited to that which is considered necessary. The suitability of the proposed access arrangements has been demonstrated through swept path analysis. Drawings 333101678-STN-HGN-XX-DR-TR-5500 Sheet 63 and Sheet 64 demonstrate that construction vehicles can access the BESS from the B1134 Station Road. In addition, Drawing 333101678-STN-HGN-XX-DR-TR-5500 Sheet 62 demonstrates that construction vehicles can access the National Grid Substation from Lodge Road. These drawings are provided within Appendix C of the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 - 177]. The Applicant acknowledges that Lodge Road and Frith Way are rural roads with constrained sections and limited passing opportunities. Construction traffic would therefore be managed in accordance with the Outline CTMP [APP-201], which includes measures such as temporary traffic management, delivery scheduling and monitoring systems, and the provision of passing places where required to minimise potential conflicts and maintain highway safety. As set out in Paragraph 7.9.2 of the Outline CTMP [APP-201], the detailed Construction Traffic Management Plan would be prepared following detailed design and would enable traffic

ID	Theme	Representation	Applicant's Response
			management measures to be refined having regard to local conditions and constraints.
SW-007	Landscape and Visual	Visual/Aural impact I am astounded that as far as I can tell, there is no mention of the sensitive receptors in Tivetshall on Station Road (Site 1) that directly face the BESS site. There are five cottages that will be directly in front of the 400kv Substation associated with the BESS and yet when I read the Environmental Statement Volume 3 (ref EN0110114), Fernleigh Farm appears to be the only one listed. [REDACTED] is Grade II listed and comprises two semi-detached cottages on the opposite side of the road that will be 100m away from the site, with no hedging or screening. There is another property next to this that would be even more exposed. Then there are three terraced houses ([REDACTED]) that are on the same side of the road as the BESS site and will be less than 50m (the buffer zone) from the substation. How can this be permissible? Is there a	The landscape and visual effects of the Scheme have been assessed in detail within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], with supporting assessments provided in ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148] and Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [APP-149]. Appendix 7.8 includes a Residential Visual Amenity Assessment for residential properties located within 100m of Scheme elements parameters. The properties referred to in your representation are not located within 100m of the relevant Scheme elements parameters and therefore do not fall within the scope of that assessment. It is possible that the distances quoted relate to the Order Limits rather than to the substation parameter itself. The wider Landscape and Visual Impact Assessment also considers visual effects. Representative view location BESS/VL9 is located adjacent to the group of properties on Station Road

ID	Theme	Representation	Applicant's Response
		reason why the 400kv substation is located in front of the BESS?	referenced in the comments and was selected to represent views experienced from this location. The assessment concluded that the visual effects at this location would be Major/Substantial (Significant) during the construction phase and Major (Significant) during the first year of operation. These effects are predicted to reduce over time as the proposed landscape mitigation becomes established, resulting in a Moderate (Significant) effect by Year 15 of operation. Detail assessment discussion is in ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. Around the BESS and the 400kV sub-station, linear tree belt is proposed. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and

ID	Theme	Representation	Applicant's Response
			decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032]. With regard to the co-location of the 400kV Project Substation within the BESS Site, the Site Selection Assessment [APP-215] explains that the criteria required for a new National Grid Substation, i.e. accessibility from the SRN etc, were also important considerations for the location of the BESS, and that identifying a location for the BESS that was proximate to the National Grid Substation would be preferable from an access perspective, and in limiting the extent of grid connection infrastructure across the Scheme. Locating the BESS in proximity to the National Grid Substation has the benefit of minimising transmission losses, maximising storage efficiency, providing effective grid balancing and supporting a faster and more reliable reaction to power outages and disruptions. It also brings together some of the taller infrastructure of the Scheme with the overhead lines, minimising the spatial distribution of these taller elements as far as practicable across the greater geographical area of the Site. The BESS Site was selected on the basis of its proximity to the PoC and access from Station Road, and with consideration of minimising

ID	Theme	Representation	Applicant's Response
			landscape and visual, heritage and noise impacts from the BESS as far as practicable. The BESS would be located, at the closest point, approximately 200m from the closest residential property, 470m from the closest listed building and 50m from the closest PRow. As set out in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], setbacks and buffer zones were introduced along parts of the western and southern boundary of the BESS Site to allow for potential landscape screening of nearby residential properties, and the BESS area was setback further in the north east of the BESS Site to provide a minimum buffer of 200m to the nearest residential property owing to fire safety best practice and in consideration of noise impacts. For the 400kV Project Substations, the Design Principles, Parameters and Commitments [APP-213] secure a minimum offset distance of 50m from the curtilage of residential properties (assessed on a case-by-case basis for individual residential properties).
SW-008	Noise and Vibration	As the substation is likely to make more noise, and is visually much taller, surely it would be less impactful both visually and aurally to situate the substation behind the BESS, making it less visible	The location of the substation has been considered to mitigate and minimise noise impacts at noise sensitive receptors. The assessment presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]

ID	Theme	Representation	Applicant's Response
	Scheme Description	from the road and further away from the cottages that back onto this site.	indicates that the resultant residual rating level would be between the NOAEL and LOAEL at one receptor (NSR3B – Dwellings on Station Road), due to noise from the BESS. This results in long term minor adverse effects which are not significant.
SW-009	Landscape and Visual	In Great Moulton, there are many properties listed as being at 'High' risk of adverse effects from the siting of the National Grid Substation. Despite trawling through the documents, I cannot seem to find what mitigation is being suggested for these properties. As we know, no amount of screening can ever hide a substation and it would take decades for trees to even begin to do so.	The landscape and visual effects of the Scheme have been assessed in detail within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and supporting appendices. Representative View Location VL3/Site1 is located on the southern edge of Great Moulton. This is assessed in detail in ES Volume 3, Appendix 7.7 - Visual Assessment Tables [APP-147] with relevant mitigation defined. This mitigation is included on the Green Infrastructure Strategy [AS-005] which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. In relation to the National Grid Substation, a linear tree belt and woodland planting is proposed to the north of the infrastructure to help filter views from surrounding receptors, including those in Great Moulton. The Applicant acknowledges that, due to the scale of the National Grid Substation and its location, it

ID	Theme	Representation	Applicant's Response
			would not be possible to completely screen the infrastructure from all views within Great Moulton. The effectiveness of this mitigation, including its establishment over time, has been taken into account within the LVIA. The assessment reports the residual landscape and visual effects, including those that remain after the proposed mitigation has become established in Year 15, to provide a realistic assessment of the likely long-term effects of the Scheme. A visualisation is included from View Location VL3/Site1 in ES Volume 3, Appendix 7.6 - Visualisations [APP-138] which shows the proposed landscape mitigation. Although a residential visual amenity assessment has been undertaken as presented in ES Volume 3, Appendix 7.8 – Residential Visual Amenity Assessment [APP-148] no properties in Great Moulton lie within 100 m of the Scheme's maximum development parameters. Taking a proportionate approach the assessment presented in ES Volume 3, Appendix 7.8 – Residential Visual Amenity Assessment [APP-148] identified residential receptors within 500m of the Schemes maximum parameters, undertaking an assessment of properties within 100m. Two properties out of

ID	Theme	Representation	Applicant's Response
			twenty properties within this 100m area were found to meet the threshold for further RVAA assessment. Therefore, given the low likelihood of effects meeting the threshold, no further detailed assessment has been carried out on residential properties located beyond this 100m offset from the maximum development parameters.
SW-010	Water Environment	Water Concerns Again referring to the Environmental Statement Volume 3, we are told that the National Grid Substation is located over a Principal Aquifer and within a Drinking Safeguard Zone. Surely despite any precautions East Pye say they will take, this is a completely inappropriate place to build a major piece of permanent infrastructure. The Project Substation is built over the same aquifer.	Whilst it is acknowledged that the National Grid Substation and Project Substations 1 and 3 are located over a Principal Aquifer, the information provided within ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184-186] indicates that the Principal aquifer is located beneath several metres of Diamicton clay, and is therefore not in direct contact with the infrastructure above it. The provision of an impermeable liner for the surface water drainage systems for these elements of the Scheme provides a precautionary approach to pollution management.
SW-011	Water Environment	Additionally, why are we told that sensitive water receptors are located within the site and have the potential to be impacted by the scheme, and there should be appropriate mitigation, only to then be informed that the impacts of the	The EIA process follows a series of steps in which the receptors that may be affected by the scheme are identified, then the potential for a likely significant effects is assessed. Where significant effects are identified mitigation may be required to reduce the level of the effect experienced. Where

ID	Theme	Representation	Applicant's Response
		scheme on these receptors have been assessed as 'not significant'?	the assessment concludes that no significant effect is expected, the outcome is classified as 'not significant'. Appropriate embedded mitigation has been provided for all elements and phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP, [APP-197], Outline DEMP [APP-198] and the Design Principles, Parameters and Commitments [APP-213]. The embedded mitigation is included to protect and manage the risk to water receptors. As such, with the inclusion of said embedded mitigation, the assessment within ES Volume 1, Chapter 9 – Water Environment [APP-045] concludes that the impacts (with exception of impacts of cessation of agricultural chemical use) are 'Not Significant'.
SW-012	Water Environment	While we are on the subject of water, this site is proposed at a time when East Anglia has been officially classified by the EA as severely water stressed. The amount of water that will be needed during construction process, not to mention if there was ever a fire at the BESS site, means the whole region will suffer at a time when water is only going	The Applicant notes the concerns about water scarcity in the area. The Applicant has carried out in ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164] with tankering identified as the preferred method of supply for potable water. The Applicant notes AWS's current position on new unplanned non-domestic water requests. This in in place by Anglian Water to protect domestic water supplies.

ID	Theme	Representation	Applicant's Response
		to become more scarce as climate change increases.	The Applicant 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. Rainwater harvesting and on-site storage have also been identified as preferred option for supply of non-potable water
SW-013	Soils and Agriculture Landscape and Visual	Management of grass beneath solar panels I see no promise of sheep grazing, wildflower meadows or bee-keeping. These were lies that we were told during the public consultations about how the land would be managed under the solar panels. While I entirely support renewable energy and solar panels, so much more could be done with the ground underneath the panels.	Further information regarding the management of habitats is provided within the Outline LEMP [APP-199]. This includes details of the modified grassland located beneath the panels included within the Scheme (amongst others) and the management approach for these, which includes the option of grazing by sheep, once established. Seasonal mowing at appropriate times of the year e.g. late-summer and early-spring if required, is an alternative approach to sheep grazing that can reward equally as beneficial results as well as avoiding unnecessary nutrient enrichment from sheep waste. A seasonal cut will take as much nutrients out of the soil as possible and allow species of forbs to establish by slowing down the growth of fast-growing grasses and therefore ensuring a more species-diverse grassland. Effort will be made to increase the species-diversity and grassland condition of the grasslands underneath

ID	Theme	Representation	Applicant's Response
			the solar arrays, however due to shading from the panels, the general approach is that grasslands should be recorded as modified grassland in poor condition, although it may be possible to increase this habitat condition within the Order Limits. The Applicant agrees that there are significant opportunities to enhance biodiversity beneath and around the solar panels. The Outline LEMP establishes the overarching principles for habitat management, with further detail to be developed through the LEMP through a Requirement in the Draft DCO [AS-032]. The Applicant notes the comment regarding beekeeping and will consider whether this could form part of the future management approach as the LEMP is developed.
SW-014	Ecology and Biodiversity	What about agrivoltaics as a concept for example? And where is the biodiversity net gain across the entire site? It does not seem anything like a net gain to me, rather a net loss.	With regard to agrivoltaics and the potential for continued agricultural use of the land, paragraph 2.3.23 of NPS EN-3, which states that where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions to maximise the efficiency of land use. As set out in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] and the Outline LEMP [APP-198], management within the Solar PV Arrays could include sheep grazing, in accordance with Requirement 7 of the Draft DCO

ID	Theme	Representation	Applicant's Response
			[AS-032], under which a detailed Landscape and Ecology Management Plan will be submitted to and approved by the relevant planning authority. As noted in the Design Approach Document [APP-212], the majority of the Site is expected to be sown to grassland and managed, including the potential for sheep grazing during the operational phase, which would have a significant benefit on the health of the soil. Whilst there is no legislative requirement for the Scheme to provide quantifiable Biodiversity Net Gain (BNG), the Applicant has sought to embed BNG into the Scheme design from the early optioneering stages through to submission. Requirement 9 of the Draft DCO secures a commitment to a minimum of 10% BNG. A detailed approach is provided within the Biodiversity Net Gain Report [APP-218] which discusses the Schemes adherence to the biodiversity gain hierarchy, and habitat baseline values and post-construction values are calculated and provided within the Biodiversity Net Gain Statutory Metric [APP-219]. Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199].

ID	Theme	Representation	Applicant's Response
SW-015	Scheme Description Grid Connection	Final thoughts There is increasing evidence that when a permanent NG Substation is built, planning applications for data centres will follow. Again, I refer to my concerns about water scarcity. A data centre water consumption can be compared to that of an entire town.	The Scheme's application for development consent does not include a data centre. As per the description of the Scheme within ES Volume 1, Chapter 4 – The Scheme [APP-040], The Scheme comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station with a total capacity exceeding 100 megawatts (MW) and associated development including a Battery Energy Storage System (BESS), up to three 132 kV Project Substations and up to three 400kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation. Any hypothetical project that is separate to the Scheme would need to apply for its own planning permission and be considered by the appropriate authority on its own merits, including a cumulative assessment with the East Pye scheme.
SW-016	Grid Connection	And why have we not heard from National Grid about their substation associated with this project? I do not feel this proposal meets any of their stated Horlock Rules regarding the siting of a new substation.	The Applicant has a grid connection offer for the Scheme requiring it to secure consent and land for the point of connection. Consent is being sought for the National Grid Substation in a location that the Applicant considers suitable based on National Grid Electricity Transmission's criteria. The Applicant will continue to engage with National Grid Electricity Transmission (NGET).

ID	Theme	Representation	Applicant's Response
			Compliance with the Horlock Rules is set out within the Site Selection Assessment [APP-215] .
SW-017	Scheme Description Grid Connection	Regarding the pylons. Norwich to Tilbury are proposing new 50m high pylons. What is the need for the four new pylons proposed by East Pye (replacing three existing, and creating one new) to be up to 61m high?	To facilitate a new connection to the existing 400 kV overhead line, the Applicant has undertaken an assessment of the current pylon configuration which is likely to be modified to align with the proposed new National Grid substation. As stated within Design Principles, Parameters and Commitments [APP213] , this could include up to four pylons, which includes relocating three existing structures and adding up to one new pylon. The existing towers within the proposed area have a maximum height of approx. 53 meters. As a worst case scenario the Applicant has considered that the new tower could have a maximum height of approximately 61 metres.

2.7 CPRE Norfolk

Table 2.7 Applicant's Response to CPRE Norfolk [\[RR-0382\]](#)

ID	Theme	Representation	Applicant's Response
CPRE-001	General remarks	We are writing to you to register to have our say in the examination of the NSIP proposal 'The East Pye Solar Farm'. CPRE Norfolk supports the transition to renewable energy and recognises the urgent need to decarbonise electricity generation. However, this support is not unconditional. Renewable energy developments must be appropriately sited and designed to avoid unacceptable harm to the countryside, landscape character, agricultural land, and rural communities. In our view, the proposed East Pye Solar Farm fails to meet these requirements.	The Applicant acknowledges CPRE Norfolk's support for the transition to renewable energy and the recognised need to decarbonise electricity generation. The Applicant notes the concerns raised regarding siting, design, landscape character, agricultural land and rural communities, and draws attention to how these matters have been addressed through the design and assessment of the Scheme within the responses set out below. Evidence for the need for the Scheme is set out in the Statement of Need [APP-206], with the Scheme required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, including the Sixth Carbon Budget and Nationally Determined Contribution. The site selection process, including the consideration of planning, environmental and operational factors and the avoidance and reduction of environmental impacts through the exclusion of ecological, landscape and heritage designations, is set out in the Site Selection Assessment [APP-215]. This process has been

ID	Theme	Representation	Applicant's Response
			informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and NPS EN-3.
CPRE-002	Site Selection, Alternatives and Design Evolution Policy Compliance	The National Planning Policy Framework (NPPF) requires planning decisions to contribute to and enhance the natural and local environment, including by protecting valued landscapes and recognising the intrinsic character and beauty of the countryside. While the NPPF supports renewable energy development, it also makes clear that proposals should be acceptable in planning terms and not result in unacceptable impacts. The scale and siting of the East Pye Solar Farm would result in significant harm to the open rural character of this part of Norfolk, contrary to these core principles.	The Applicant draws attention to the fact that policy compliance with the NPPF, including paragraph 187 relating to protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside, is addressed in the Policy Compliance Document [APP-211]. The Order Limits are not located within any national designated landscape (National Parks or National Landscapes) or local landscape designations, as set out in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. Furthermore, since submission of the Application the NPPF was updated in August 2026 and reference to this specific policy has now been removed. The Applicant considers that the Scheme is in accordance with national energy policy, national planning policy, and any relevant development plan when considered as a whole. For the purpose of the Secretary of State decision making National Policy Statement are the primary documents for NSIPs, including this Scheme pursuant to s104 Planning Act 2008. The likely significant effects of the Scheme on landscape character and visual amenity have been

ID	Theme	Representation	Applicant's Response
			assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] . The Applicant acknowledges that there will be some unavoidable landscape and visual impacts as a result of the Scheme, which have been assessed within the Environmental Statement, with mitigation measures embedded in the Scheme design and through outline management plans are secured via the Requirements contained within Schedule 2 to the Draft DCO [AS-032] .
CPRE-003	Landscape and Visual	The proposal would introduce an industrial-scale development into an open agricultural landscape, fundamentally altering its character. CPRE Norfolk is particularly concerned about the cumulative impact of large solar installations across rural Norfolk, which would cause industrialisation of the countryside.	The Applicant notes the concern about change of land use. The effect of the Scheme on land use change is considered in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. While the Scheme would introduce solar infrastructure into a predominantly agricultural landscape, it would not result in the industrialisation of the countryside. Unlike conventional industrial development, the solar arrays are not permanent, and do not involve extensive built form, large buildings, or significant areas of hardstanding. The Site would remain largely undeveloped in character, with the vast majority of land retained as grassland or be used for landscape mitigation. The Outline LEMP [APP-

ID	Theme	Representation	Applicant's Response
			199] describes grassland will be planted in the Solar PV Array, setting out the prescriptions and the targets, along with the management approach and schedule. The LEMP secured by Requirement 7 of the Draft DCO [AS-032] will also establish regular monitoring activities.
CPRE-004	Landscape and Visual	The Landscape Character Assessment identifies a key landscape type relevant to the East Pye Solar Farm. The solar farm lies within the South Norfolk Claylands. Furthermore the South Norfolk Local Landscape Designations Review (2012) classifies the landscape as Rural River Valley and Tributary Farmland Landscape Character types. Characterized by gently rolling farmland with open, expansive views, mature trees, scattered woodlands, and a patchwork of arable fields. The area has a rural, agricultural feel with a low density of settlements.	The Applicant notes the Landscape Character types. ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119] sets out the detail landscape baseline description for ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The Applicant is aware of other projects in the region. The ES [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The Drovers Solar Farm and High Grove Solar Farm have been included within the cumulative developments list, as detailed in ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP- 058]. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider

ID	Theme	Representation	Applicant's Response
			region (inclusive of Suffolk). The Applicant will be submitting a DCO Interrelationship Report into the Examination. With regards to the Tasway Energy Park, the Applicant has sought to assess all cumulate schemes in accordance with <i>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017</i> (the EIA Regulations) and the Planning Inspectorate's <i>Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment</i>. The EIA Regulations require the assessment to take into account '<i>the cumulation of effects with other existing and/or approved projects...</i>' (Schedule 4, paragraph 5(e)) and the same is required by the Planning Inspectorate's <i>Advice on Cumulative Effects Assessment</i>. The Tasway Energy Park project is on indefinite hold and is no longer identified on the Planning Inspectorates website as a DCO project. Should the Tasway Energy Park project ever proceed, the cumulative effects of the East Pye Solar and Tasway Energy Park projects would need to be assessed in full as a part of the Tasway Energy Park DCO application in accordance with the aforementioned guidance.

ID	Theme	Representation	Applicant's Response
CPRE-005	Landscape and Visual	The proposed scale and extent of the solar array will create a significant alteration to the open rural character, especially from nearby public rights of way and minor roads. The large-scale installation of 4.5m solar panels across thousands of acres introduces an extensive, visually intrusive feature. The uniform, reflective nature of PV panels is incongruous with the more organic patterns of field and hedgerow found here. The reflective surfaces and the sheer extent of the development would contrast with the traditional farmland. This could significantly alter the sense of openness and rural tranquillity valued in the countryside. Associated infrastructure fences and security cameras, inverter buildings, substations and new access roads as well as a large grid substation would add additional significant industrial/artificial features into a landscape which is currently attractive and tranquil.	The Applicant notes the concern about the Scheme's impact on landscape and visual amenity, as well as tranquillity. The Order Limits are not located within any national designated landscape (National Parks or National Landscapes) or local landscape designations, as set out in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Further, a visual amenity assessment of Public Rights of Way is present in ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149] and on residential properties in ES Volume 3, Appendix 7.8 – Residential Visual Amenity Assessment [APP-148]. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the Design Approach Document [APP-212]. A Green Infrastructure Strategy [AS-005] has been developed which includes

ID	Theme	Representation	Applicant's Response
			strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032]. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
CPRE-006	Policy Compliance	Development of this kind in open countryside is contrary to local and national policies. NPPF Paragraph 193 adds that planning permission should be refused for development resulting in significant	The Applicant notes the reference to NPPF Paragraph 193 and the concerns raised regarding development in open countryside. The Applicant draws attention to the fact that NPPF Paragraph 193 relates to biodiversity, not landscape. Notwithstanding, the NPPF was updated in August 2026. Note the Applicants response to CPRE-002

ID	Theme	Representation	Applicant's Response
		harm to a landscape which cannot be adequately mitigated.	above. The Applicant will submit at Deadline 1 an update to the Planning Statement [APP-209] and Policy Compliance Document [APP-211] document to address the new NPPF. Furthermore, the Applicant considers that the Scheme is in accordance with national energy policy, national planning policy, and any relevant development plan when considered as a whole. For the purpose of the Secretary of State decision making National Policy Statement are the primary documents for NSIPs, including this Scheme pursuant to s104 Planning Act 2008. In respect of landscape effects, these are assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043], with policy compliance addressed in the Policy Compliance Document [APP-211] and the planning balance set out in the Planning Statement [APP-209] which concludes that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case, having regard to the urgent need and critical national priority for the Scheme as set out in Government policy.
CPRE-007	Landscape and Visual	This development would result in substantial visual harm. Views from nearby villages and public footpaths may be affected, potentially reducing the visual quality of the countryside. No	The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines it has informed the iterative

ID	Theme	Representation	Applicant's Response
		robust Landscape and Visual Impact Assessment (LVIA) appears to accompany the proposal, and any claimed mitigation through screening or planting is unlikely to reduce the visual harm during the 40/60-year operational period. Furthermore, much of the mitigation on offer, e.g. planting hedgerows, would destroy current open attractive views along footpaths and minor roads.	design process and is robust and appropriate for the assessment of the Scheme. The Green Infrastructure Strategy [AS-005] provides detail on the proposed landscape and ecological measures. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integration and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. The Applicant's position is that as proposed landscape mitigation establishes and matures over the long term, including hedgerow reinforcement

ID	Theme	Representation	Applicant's Response
			and new hedgerow, tree and woodland planting landscape and visual effect will reduce over time. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
CPRE-008	Landscape and Visual	In addition the proposal does not recognise 'the intrinsic character and beauty of the countryside' as required by NPPF (Dec 2024) para. 187b. Although the proposal does include planting, screening, minimal lighting etc. it still proposes to alter the intrinsic character of the countryside site through the imposition of solar arrays and several alien structures. Although the claim is these will be temporary, the reality is that this development would lead to these harms being felt for 40/60 years, plus the time taken to construct and decommission the site (if indeed it was decommissioned at that point.)	The Applicant notes the concerns raised regarding NPPF paragraph 187b and the effect of the Scheme on the intrinsic character and beauty of the countryside. Policy compliance with paragraph 187 of the NPPF is set out in the Policy Compliance Document [APP-211]. The Order Limits are not located within any national designated landscape (National Parks or National Landscapes) or local landscape designations, as set out in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. Furthermore, since submission of the Application the NPPF was updated in August 2026 and reference to this specific policy has now been removed. The Applicant considers that the Scheme is in accordance with national energy policy, national planning policy, and any relevant development plan when considered as a whole. For the purpose

ID	Theme	Representation	Applicant's Response
			of the Secretary of State decision making National Policy Statement are the primary documents for NSIPs, including this Scheme pursuant to s104 Planning Act 2008. As set out in the Design Approach Document [APP-212], the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding area. The design has evolved through an iterative process to respond to the landscape character, retain key landscape features and provide green infrastructure that responds positively to the setting and prevailing landscape character. The likely significant landscape and visual effects of the Scheme, including during the operational phase, have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. The Applicant acknowledges that there will be some residual adverse landscape and visual effects. Embedded mitigation includes design buffers to retain and protect key landscape features, strengthening of existing hedgerows, new tree, woodland and grassland planting and restoration of ghost ponds, secured through the Design Principles, Parameters and Commitments [APP-213] and illustrated in the Green Infrastructure Strategy [AS-005]. Long-term management of these measures over

ID	Theme	Representation	Applicant's Response
			the operational lifetime of the Scheme is secured through the Outline LEMP [APP-199] in accordance with Requirement 7 of the Draft DCO [AS-032]. The Scheme has an operational lifetime of 60 years, following which decommissioning will take place. Unlike most built development, solar farms comprise temporary structures. As set out in ES Volume 1, Chapter 4 – The Scheme [APP-040] and secured through the Outline DEMP [APP-198], foundations and other below-ground infrastructure will be cut to 1.2m below the surface to enable future ploughing, with the land reinstated and soils restored to their previous condition. Post-decommissioning, the landowners will choose how the land is to be used and managed, with the expectation that agricultural use will return. Decommissioning is secured through Requirement 21 of the Draft DCO [AS-032].
CPRE-009	Landscape and Visual	The development is situated within a landscape characterized by rural tranquillity. Much of this landscape is notably identified on the Countryside Charity (CPRE) Tranquillity Map as a region of high tranquillity, indicating its value for quiet enjoyment and natural beauty. CPRE's Tranquillity Map, developed through research by	The CPRE Tranquillity Map is reviewed as part of the ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. Details of the perceived tranquillity of each of the landscape character area is described in ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119]. The Applicant acknowledges that the Scheme would result in some residual adverse landscape

ID	Theme	Representation	Applicant's Response
		Northumbria University, assesses areas based on factors such as naturalness, noise levels, and human activity. The map highlights regions where tranquillity is prevalent and those where it is diminished due to factors like infrastructure and urban development. While the most recent national tranquillity map was published in 2007, it provides valuable insights into the landscape context of proposed developments like the East Pye Solar Farm. The East Pye Solar Farm's location in South Norfolk District, falls within an area identified as having high tranquillity. This designation underscores the importance of the landscape for local communities and wildlife. The introduction of a large-scale solar farm in such a setting raises concerns about potential impacts on the area's tranquil character.	and visual effects, including effects on perceptions of tranquillity. To minimise these effects, a range of embedded mitigation measures have been incorporated into the Scheme design. These include landscape buffers, strengthening of existing hedgerows, extensive new tree, woodland and grassland planting, and the restoration of ghost ponds. These measures are secured through the Design Principles, Parameters and Commitments [APP-213] and illustrated within the Green Infrastructure Strategy [AS-005]. The long-term establishment and management of these measures throughout the operational lifetime of the Scheme would be secured through the Outline LEMP [APP-199], in accordance with Requirement 7 of the Draft DCO [AS-032]. Whilst these measures would not remove the change in land use associated with the Scheme, they would reduce the visibility of solar infrastructure and associated operational activities from surrounding receptors, reducing effects on visual amenity and perceptions of tranquillity.

ID	Theme	Representation	Applicant's Response
CPRE-010	Landscape and Visual Lighting Noise and Vibration	The development of the East Pye Solar Farm may introduce elements that could affect the area's tranquillity, including: - Visual Intrusion: The presence of large solar panels, security fencing, and associated infrastructure could alter the open, rural vistas characteristic of the area. - Noise: Operational sounds from the solar farm and associated facilities might introduce noise into an otherwise quiet environment. - Light Pollution: Increased lighting for security and operational purposes could affect the natural night-time environment. This stands in line with Paragraph 198 of the NPPF that relates to development being appropriate for its location, referring specifically to noise and light pollution and draws attention to intrinsically dark landscapes and nature conservation.	Visual mitigation is addressed above in CPRE-009. The following commitments are included in the Outline LEMP [APP-197]. - Noise from the BESS will achieve the predicted sound levels in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. - The rating level from other elements of the Scheme will not exceed the background sound level at other residential receptors. - Specific sound levels due to plant on the Scheme on PRowWs will not exceed 55 dBA. Mitigation measures for lighting include controls on construction lighting secured through the Lighting Strategy [APP-151] and design principles set out in the Design Approach Document [APP-212], which seek to minimise light spill and reduce effects on residential amenity, Public Rights of Way, and the rural setting. The Applicant considers that the Scheme is in accordance with national energy policy, national planning policy, and any relevant development plan when considered as a whole. For the purpose of the Secretary of State decision making National Policy Statement are the primary documents for

ID	Theme	Representation	Applicant's Response
			NSIPs, including this Scheme pursuant to s104 Planning Act 2008.
CPRE-011	Landscape and Visual	The submitted information does not, in our view, demonstrate that landscape and visual impacts have been adequately avoided or minimised, as required by both national policy and good planning practice. Screening and mitigation cannot fully address the long-term change in land use and character that this development would introduce.	The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure, as set out in the Design Approach Document [APP-212]. The Scheme includes exclusion of development at certain locations to avoid adverse effects and also offsets from receptors and features as defined in the Design Principles, Parameters and Commitments [APP-213] to minimise effects. In addition, the Green Infrastructure Strategy [AS-005] has been developed and includes strengthening/reinforcing existing hedgerows alongside new hedgerow, tree and woodland planting. Overtime these measures would provide visual screening and landscape integration to mitigate the long term effects of the Scheme. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline

ID	Theme	Representation	Applicant's Response
			CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032]. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
CPRE-012	Soils and Agriculture	CPRE Norfolk has longstanding concerns about the loss of agricultural land to large-scale solar development. The NPPF seeks to protect the best and most versatile agricultural land (Grades 1, 2 and 3a). Where such land is affected, applicants are expected to demonstrate that poorer quality land is unavailable and that the development is necessary in that location. We are not satisfied that the application robustly justifies the use of productive agricultural land, nor that alternative locations—such as previously developed land, commercial rooftops, car parks, or less sensitive sites—have been properly explored.	The Applicant draws attention to the fact that NPS EN-3 acknowledges that ground-mounted solar is not prohibited on Best and Most Versatile (BMV) quality land and that land type should not be a predominating factor in determining the suitability of the site location. NPS EN-3 recognises that, at scale, developments may use some agricultural land. 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. Large-scale ground-mounted solar therefore remains necessary in addition to, not

ID	Theme	Representation	Applicant's Response
			instead of, rooftop solar. 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] .
CPRE-013	Soils and Agriculture Site Selection, Alternatives and Design Evolution	CPRE has consistently advocated a "rooftops first" approach to solar deployment. Large-scale ground-mounted solar should not be treated as the default option where less harmful alternatives exist. The application fails to demonstrate that a sequential approach to site selection has been applied, contrary to the principle of sustainable development. Research by UCL for CPRE demonstrates that 117GW of solar energy is obtainable from roofs and artificial surfaces by 2050.	Please refer to the response provided above. 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. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. Consideration of brownfield land and rooftops for the Scheme is set out within the Site Selection Assessment [APP-215] .
CPRE-014	Ecology and Biodiversity Statement of Need Landscape and Visual	CPRE Norfolk endorses comments made by 'Block East Pye Solar' in particular the following comments. 'The scheme would cause extensive and, in several respects, unmitigable harm to protected species including Barbastelle bats, chalk-stream ecology, ancient woodland and SSSI-linked habitats, designated and non-designated heritage assets, including churches, listed	The Applicant notes this comment and has provided a response to Block East Pye Solar's Relevant Representation in Table 2.3 of this document.

ID	Theme	Representation	Applicant's Response
		buildings and conservation areas, best and most versatile agricultural land, rural communities, public rights of way, landscape character and local infrastructure. These harms are location-specific and cannot be made acceptable simply by later mitigation, planting, management plans, or post-consent licensing. They are not outweighed by any demonstrated regional need for this scheme in this location, particularly where the applicant has not shown that East Pye Solar is required to meet East Anglia's renewable energy targets or that less harmful alternatives have been properly assessed. The project therefore fails the basic planning balance: it would impose severe, long-term and legally significant harm on South Norfolk without a compelling, site-specific public need. The applicant relies on a general national need for renewable energy. That is not sufficient to justify placing this particular scale of industrial solar and electricity infrastructure in this particular location. We understand that regional transmission solar capacity targets are met or exceeded by existing,	

ID	Theme	Representation	Applicant's Response
		consented and pipeline projects, and that general claims about “optionality” or attrition do not justify severe harm in a highly sensitive landscape.’	
CPRE-015	General remarks	The proposal is inconsistent with the objectives of national and local planning policy, which seek to protect distinctive landscapes, support sustainable rural communities, and direct inappropriate development away from the open countryside. This proposal would introduce industrial-scale infrastructure into a rural, visually sensitive setting, resulting in significant and irreversible landscape harm.	As previously set out, the Applicant draws attention to the fact that the position on policy compliance, including against national planning policy (NPS EN-1, NPS EN-3 and the NPPF) and local planning policy, is set out in the Policy Compliance Document [APP-211]. National Policy Statements (NPS) set out the primary policy tests against which the application for a Development Consent Order (DCO) for the Scheme will be considered. The Overarching NPS EN-1 2025 sets out the Government's policy for delivery of major infrastructure and is the primary basis for decision-making relating to energy projects, together with NPS EN-3 for Renewable Energy Infrastructure and NPS EN-5 for Electricity Networks Infrastructure. As set out in the Statement of Need [APP-206], the Scheme is required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, including the Sixth Carbon Budget and Nationally Determined Contribution, and is designated as a Nationally

ID	Theme	Representation	Applicant's Response
			Significant Infrastructure Project and Critical National Priority infrastructure under NPS EN-1. The planning balance is set out in the Planning Statement [APP-209], which considers that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.

2.8 Forestry Commission

Table 2.8 Applicant's Response to the Forestry Commission [[RR-0604](#)]

ID	Theme	Representation	Applicant's Response
FC-001	General remarks	As a Non-Ministerial Government Department, the Forestry Commission can provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland. This site is directly adjacent to six ancient woodlands; Saxlingham Grove (ASNW), Doyly's Grove (ASNW), Popes Wood (PAWS), Spring Wood (PAWS), Little Wood (ASNW) and Ringers Grove (ASNW).	The Applicant makes note of this response and thanks the Forestry Commission for providing feedback. The presence of Ancient Woodlands in proximity to the scheme have been addressed in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP-150] supporting the DCO Application.
FC-002	Ecology and Biodiversity	Ancient Woodland: Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural	The Applicant acknowledges that the development should avoid direct and indirect impacts on ancient woodland, ancient and veteran trees. There would be no loss of Ancient Woodland or veteran trees. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the ancient woodland, ancient and veteran trees in accordance

ID	Theme	Representation	Applicant's Response
		Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Section 5.4.32 of EN-1 – The Overarching National Policy Statement for Energy states: “Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases” We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and “Keepers of Time” – Ancient and Native Woodland and Trees Policy in England.	with Natural England and Forestry Commission's Standing Advice. The Applicant's position on compliance with NPS EN-1 Section 5.4.33 (the responder has quoted the incorrect paragraph number in EN-1) is further detailed within the Planning Statement [APP-209] and Policy Compliance Document [APP-210].
FC-003	Ecology and Biodiversity	We note that a minimum buffer of 30m will be applied to all of the ancient woodlands, with a 15m buffer used for all other woodlands.	The Applicant draws attention to the fact that the design buffers have evolved through the design process and, as set out in the Design Approach Document [APP-212], in response to feedback from South Norfolk Council, Natural England, the Forestry Commission and Norfolk Wildlife Trust, the design buffer to Ancient Woodland has been

ID	Theme	Representation	Applicant's Response
	Design Principles, Parameters and Commitments		increased to 30m (from 15m), with a 15m buffer applied to individual trees, groups of trees and non-Ancient Woodland.
FC-004	Ecology and Biodiversity	We note that direct and indirect impacts on the ancient woodlands have been considered. However concerns remain regarding Doyly's Grove and in particular Ringers Grove. These are both small ancient woodlands and will therefore be particularly vulnerable to becoming isolated in their landscape and the effects of climate change. In the case of Ringers Grove, the woodland will be almost completely enclosed by the development, with Market Lane providing the remaining boundary on the north western edge.	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of potential impacts on important ecological features including fragmentation of ancient woodlands. The Scheme has been designed to avoid all direct impacts to Ancient Woodland parcels, the 30m buffer zones set out in the Design Parameters and Design Principles [APP-213] being retained and enhanced through sympathetic management practices detailed within the Outline LEMP [APP-199]. The Outline LEMP [APP-199] will maintain habitat buffers of a minimum of 30m surrounding Ringers Grove thereby adhering to BS5837:2012 Trees in relation to design, demolition and construction and current guidance provided by Natural England. It is considered that with good practice measures and the management of habitat buffers within Sub-Site 8B, Ringers Grove will benefit from connectivity with ecologically resilient natural corridors in the landscape compared to the current baseline, which comprises predominantly intensively managed farmland. The embedded design principles adopted and detailed within Design Principles, Parameters

ID	Theme	Representation	Applicant's Response
			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 (including woodlands) for the benefit of many species. Large areas of intensively managed arable land will be removed from intensive cultivation as a result of the Scheme, with the cessation of fertiliser application, pesticide and herbicide use, and converted to grassland mosaics, managed for the benefit of biodiversity. Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199].
FC-005	Ecology and Biodiversity	Fragmentation is one of the greatest threats to ancient woodlands, where they become isolated in their landscape, particularly with the use of deer fencing. Woodlands that become isolated in their landscape and surrounded by development will deteriorate over time if habitat connectivity is not considered and provided.	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of potential impacts on important ecological features including fragmentation of ancient woodlands. 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

ID	Theme	Representation	Applicant's Response
			lines/woodlands/ rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains (including woodlands) for the benefit of many species. Large areas of intensively managed arable land will be removed from intensive cultivation as a result of the Scheme, with the cessation of fertiliser application, pesticide and herbicide use, and converted to grassland mosaics, managed for the benefit of biodiversity. Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199]. The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors are included in the Scheme, such as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors. The indicative alignment of perimeter fencing is shown on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. Details of fencing will need to be submitted and approved by the relevant

ID	Theme	Representation	Applicant's Response
			planning authority in accordance with Requirement 10 of the Draft DCO [AS-032] .
FC-006	Ecology and Biodiversity	There is the potential to increase the area of woodland planting for both of these woodlands, when connected with the existing ancient woodlands to create blocks of at least 5ha, making the woodlands more resilient. Especially when incorporated with further woodland edge and scrubby habitat providing a graduated edge as part of a mosaic of habitats.	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 (including woodlands) for the benefit of many species. Broadleaf woodland has been proposed in various locations across the Order Limits. Woodland has been proposed to meet ecological and visual screening functions, and provide ecological habitat connectivity across the wider landscape. The Applicant considers the proposed woodland creation measures proposed within the Outline LEMP [APP-199] have been carefully sited with regard to existing habitats.
FC-007	Ecology and Biodiversity	We note plans include protections measures for all woodlands, including a sensitive light design to avoid illuminating the woodlands and that no	The Applicant makes note of this comment.

ID	Theme	Representation	Applicant's Response
		excavations will be undertaken in buffer areas.	
FC-008	Ecology and Biodiversity Design Principles, Parameters and Commitments	Ancient & Veteran Trees: We note documents state that 39 ancient & veteran trees have been identified within or adjacent to the site and that all will be retained with no loss or deterioration. The buffer zones applied appear to be sufficient, although concerns remain about the potential for some development, particularly regarding access within the RPA's of some of the veteran trees.	The Applicant is committed to no loss of Ancient Woodland or ancient and veteran trees, and ground protection will be installed within the RPA of retained trees as secured in the Outline CEMP [APP-196]. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032]. Among other measures, during the construction phase hoarding and construction exclusion zones will be introduced around retained trees and will consist of protective fencing. This will prevent entry of machinery, materials/spoil and excavations in the protected areas. In some instances, a wider working area may be necessary. In this instance and in consultation with the Arboriculturist, an amended location for the protective fencing will be agreed with the Arboriculturist and ground protection measures put in place. The protective fencing will remain in place throughout construction in the area and only be altered under Arboriculturist supervision.
FC-009	Ecology and Biodiversity	For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times	The buffer zone recommendations from Natural England and Forestry Commission's Standing Advice have been adopted and secured in the

ID	Theme	Representation	Applicant's Response
	Design Principles, Parameters and Commitments	larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area.	Design Principles, Parameters and Commitments [APP-213].
FC-010	Ecology and Biodiversity	An increase in traffic, particularly heavy construction traffic within the RPA's could lead to habitat degradation. Any effect from the incursion into RPA's of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction. Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage.	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including designated sites for nature conservation, ancient woodlands, protected and notable habitats and species. Mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032]. Among other measures, during the construction phase hoarding and construction exclusion zones will be introduced around retained trees and will consist of protective fencing. This will prevent entry of machinery, materials/spoil and excavations in the protected areas. In some instances, a wider working area may be necessary. In this instance and in consultation with the Arboriculturist, an amended location for the protective fencing will be agreed with the Arboriculturist and ground protection measures put in place. The protective fencing will remain in place

ID	Theme	Representation	Applicant's Response
			throughout construction in the area and only be altered under the Arboriculturist supervision. As the management plans cover the full lifecycle of the project, affect not trees not immediately apparent will be identified as a part of the ongoing monitoring and management of the Scheme. Potential impacts to ancient woodland and trees during construction through air or hydrological pathways will be avoided through measures set out within the Outline CEMP [APP-196]. ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] concludes that residual effects to ancient woodland and ancient/veteran trees, in the context of the secured mitigation measures, will be not significant. Natural England, who alongside the Forestry Commission publish advice for making planning decisions with respect to ancient/veteran trees has not raised any issues with potential impacts to ancient woodland or ancient/veteran trees through its Relevant Representation [RR-1410], and indicated it is satisfied with the mitigation measures proposed.
FC-012	Ecology and Biodiversity	Deer fencing: As this project will include a large area of fencing, it has the scope to exclude a	The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors are included in the Scheme, such

ID	Theme	Representation	Applicant's Response
	Landscape and Visual	large amount of farmland from the deer range in the area. In areas where woodlands are contained and surrounded by the site, fencing could curtail their movement if they are inside the fencing. This is likely to increase herbivore browsing and grazing to other areas in close proximity to the site. Impacts are likely to increase in surrounding woodlands, including ancient woodlands and the wider landscape, where hedgerows and stewardship schemes may be impacted upon. Large scale fencing will also change how deer move through the landscape, which may also increase the numbers of deer crossing local roads, and therefore may increase the numbers of deer vehicle collisions in the area. If culls occur prior to development, the risks should reduce.	as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors.
FC-013	Ecology and Biodiversity Landscape and Visual	Tree Planting: As stated in the Environmental Improvement Plan 2025 it is a strategic government objective to increase the net area of tree canopy and woodland	The Applicants welcomes these comments on tree planting. The Outline LEMP [APP-199] establishes a framework for the Scheme, with all details subject to further work and stakeholder engagement. The

ID	Theme	Representation	Applicant's Response
		cover to 16.5% of total land area in England by 2050. Therefore, the Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. We note that landscape proposals include woodland planting of 24.95ha (figure taken from the BNG report) which equates to over 2% of the total site area and an overall canopy cover increase. Plans also include tree belt planting for screening, some scrub planting and individual trees. These will improve habitat connectivity across the site, although as stated, further planting in the area of Ringers Grove should be considered. The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full	Outline LEMP is supported by the Green Infrastructure Strategy [AS-005], which provides detail on the proposed landscape and ecological measures across the Scheme. The Outline LEMP includes a commitment to providing a LEMP created prior to commencement of the Scheme by the Applicant, which will be approved by the relevant planning authority pursuant to Requirement 7 in the Draft DCO [AS-032]. The LEMP will include: • The detailed landscape proposal plans to identify the location, number, species, size, and planting density of any proposed landscape planting and ecological measures. • Landscape planting specification including, cultivation, importing of materials and other operations to ensure landscape planting establishment. • Implementation timetables for all landscape planting and ecological measures. • Management and maintenance timetables for all landscape planting and ecological measures.

ID	Theme	Representation	Applicant's Response
		implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, particularly in areas near ancient woodlands. Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience.	Monitoring prescriptions for all landscape planting and ecological measures.
FC-014	Ecology and Biodiversity Landscape and Visual	We note plans are in place to secure the long term management of new and existing woodlands.	The Applicant welcomes this comment.

2.9 Forncett Nature Matters

Table 2.9 Applicant's Response to Forncett Nature Matters [\[RR-0605\]](#)

ID	Theme	Representation	Applicant's Response
FNM-001	General remarks	Forncett Nature Matters is a group dedicated to maintaining and expanding a healthy natural environment – connecting people: connecting nature. We have around 100 supporters. We are in favour of renewable energy. However developments on the scale of East Pye are totally inappropriate and very destructive for the local environment and for community well-being.	The Applicant welcomes continued engagement with stakeholders and community groups throughout the Examination process. Information relating to the Scheme, including the application documents, is publicly available on the Planning Inspectorate's website. The full suite of application documents can be accessed via the Examination Library, including the Consultation Report [APP-024] and the ES [APP-035 to APP-195]. Interested Parties may review these documents and participate in the Examination in accordance with the procedures set out by the Examining Authority.
FNM-002	Water Environment Ecology and Biodiversity	The River Tas The River Tas is a chalk stream – one of only around 200 in the world. This makes it incredibly rare and precious.	This comment is noted and we would refer to the response made for BEPSSG-015 in relation to potential impacts of pollution and flood risk from the Scheme to watercourses (including the River Tas) and aquifers. The response below is in relation to comment on native crayfish:

ID	Theme	Representation	Applicant's Response
	Ground Conditions Battery safety	- Populations of rare native crayfish have been noted in the river as well as otters. - The very extensive solar development poses a risk to the whole of the Eastern catchment through contamination and added flood risk both during and after installation. - Additionally the huge Battery Storage unit proposed for Great Moulton would result in catastrophic pollution in the event of a fire. - There is also risk to other watercourses and aquifers.	A desk-based review of available ecological records was undertaken as part of the aquatic ecology assessment. No records of white-clawed crayfish (<i>Austropotamobius pallipes</i>) were identified within the Order Limits or within the watercourses crossed by the Scheme, as presented in ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment [APP-160]. Notwithstanding the absence of records, the assessment adopted a precautionary approach and embedded mitigation has been incorporated into the Scheme design to minimise potential impacts on aquatic habitats and species. The Outline Cable Route Construction Statement [APP-216] commits to trenchless crossing techniques at sensitive watercourse crossings, including the River Tas, with launch and reception pits located outside defined Avoidance Areas. Cables beneath main rivers will be installed at a minimum depth of 5 m below the surveyed riverbed. These measures substantially reduce the potential for direct disturbance to river habitats, riverbanks and the riverbed, thereby avoiding impact pathways to aquatic species that may be present

ID	Theme	Representation	Applicant's Response
			within the River Tas, including native white-clawed crayfish. The Scheme is also subject to construction environmental management measures, pollution prevention controls and drainage design measures that are intended to prevent contamination of surface waters, groundwater and underlying aquifers during construction and operation. Therefore, the embedded mitigation and design commitments incorporated within the Scheme are sufficient to avoid significant effects on the River Tas and other aquatic receptors. The below response addresses the Battery Storage unit element of the Scheme: The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The Outline BSMP [APP-200] fully accommodates the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs.

ID	Theme	Representation	Applicant's Response
			The safety objectives for the design of the BESS site are listed in Section 1.4 of the Outline BSMP [APP-200]. Section 1.4.2 of the Outline BSMP [APP-200] stipulates: <i>"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> <i>• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i> <i>• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."</i>

ID	Theme	Representation	Applicant's Response
			Section 2 of the Outline BSMP [APP-200] documents the Applicant's consultation with NFRS and Section 4 of the Outline BSMP [APP-200] covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Outline BSMP [APP-200] Section 4.5 documents the drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the Outline BSMP [APP-200] is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The Environment Agency (EA) is a statutory consultee for the Scheme, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A Statement of Common Ground between the Applicant and the EA will be submitted as part of the DCO process.

ID	Theme	Representation	Applicant's Response
			The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032]. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency, prior to the commencement of the works for the BESS. The BSMP will be substantially in accordance with the Outline BSMP [APP-200].
FNM-003	Ecology and Biodiversity	Industrialisation and Habitat Loss - These rural areas support a wide variety of animals and plants, hedgerows and trees, reflecting an ancient landscape. - The project would result in an industrial landscape unable to support many of the species currently there, negatively impacting biodiversity. - Animals and plant communities will be severely damaged by the destruction caused by installation, including the rich habitats of roadside verges and drainage ditches impacted by heavy construction traffic on small lanes.	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including designated sites for nature conservation, protected and notable habitats and species. This includes consideration of construction phase activities, decommissioning activities, and once the Scheme is operational, including in relation to noise, glare, fragmentation and habitat loss. The Ecology and Biodiversity chapter has been underpinned by extensive baseline ecological survey for habitats and species, as detailed within ES Volume 3, Appendices 8.1 – 8.9 [APP-152 - APP-160]. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 -Indicative Masterplan

ID	Theme	Representation	Applicant's Response
		• Loss of habitats, loss of connectivity due to fencing and disturbance from glare and noise all have a serious impact on nature. • The area is recognised as especially important for highly protected Barbastelle bats which would be at severe risk from disruption and habitat loss. • The lack of biodiversity in existing solar developments around the country shows how ineffective mitigation methods frequently are.	[APP-059] have been applied to retain, protect and enhance ecological assets. They include for 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 wildlife. The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors are included in the Scheme, such as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors. The indicative alignment of perimeter fencing is shown on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. Details of fencing will need to be submitted and approved by the relevant planning authority in accordance with Requirement 10 of the Draft DCO [AS-032]. Further details with regard barbastelle bats specifically are provided in relation to BEPSG-013. Whilst there is no legislative requirement for the Scheme to provide quantifiable Biodiversity Net

ID	Theme	Representation	Applicant's Response
			Gain (BNG), the Applicant has sought to embed BNG into the Scheme design from the early optioneering stages through to submission. Requirement 9 of the Draft DCO secures a commitment to a minimum of 10% BNG. A detailed approach is provided within the Biodiversity Net Gain Report [APP-218] which discusses the Schemes adherence to the biodiversity gain hierarchy, and habitat baseline values and post-construction values are calculated and provided within the Biodiversity Net Gain Statutory Metric [APP-219] . Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199] .
FNM-004	Human Health Noise and Vibration	Community Wellbeing - Human Beings need nature for their physical and mental health, for exercise, rest and relaxation. - This development, which has no benefits for local people, denies us amenity space, Public Rights of Way, privacy from CCTV monitoring. - Additionally some of the development is extremely close to residential properties and the Battery Storage proposal and noise pollution	Mental health and wellbeing have been assessed within the Equality Impact Assessment [APP-214] and human health in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] . The assessments recognise that construction may result in temporary effects on access to recreational routes, open space, residential amenity and wellbeing through noise, dust, traffic and visual change. Particular consideration has been given to potentially more sensitive groups. Mitigation measures to avoid and reduce environmental impacts have been embedded within the Scheme and are set out in the various management plans,

ID	Theme	Representation	Applicant's Response
		pose both physical and mental health risks.	including the Outline CEMP [APP-196], Outline CTMP [APP-201], Outline OEMP [APP-197] and Outline OTMP [APP-202], Outline LEMP [APP-199], Outline ESSC [APP-205] and the Outline PRoWPPMP [APP-203]. Efforts to provide specific benefits in locally impacted communities are set out in the Outline ESSCS [APP-205] for employment and economy and in the Outline LEMP [APP-199] in relation to landscape and through the provision of community benefits such as new permissive access routes and community accessible spaces. Overall, the assessments conclude that, with mitigation in place, the Scheme is not expected to result in significant adverse residual effects on human health or community wellbeing, and may deliver some benefits through enhanced access to green space and recreational routes. The assessment of operational noise and vibration is presented in ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]. Mitigation measures to control noise and vibration during operation are described in the Outline OEMP [APP-197]. This includes in relation to the solar invertors, National Grid Substation, BESS, Integrated Conversion Units/33kV Sub-

ID	Theme	Representation	Applicant's Response
			Distribution Switch Rooms and Project Substations. The specification of plant machinery with low noise emission and properly attenuated supply and extract terminations will help to minimise noise emissions during the operational phase. The use of enclosures, local screening, mufflers, and silencers will also be used as appropriate. Plant within the National Grid Substation will be designed to have minimal tonal, impulsive or intermittent features as far as is practicable. In accordance with Requirement 14 of the Draft DCO [AS-032] a detailed OEMP will be submitted to and approved with the relevant planning authority.
FNM-005	Cumulative impact	Landscape-scale destruction • South Norfolk already has massive impacts from other infrastructure projects – including the Norwich to Tilbury Pylon route by National Grid. • In terms of destruction of local biodiversity, environment and landscape East Pye cannot be seen in isolation. The overall impacts of	The Applicant is aware of other projects in the region. The technical chapters of the ES Volume 1 [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The ES is considered to meet the requirements of Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The cumulative developments assessed within the ES,

ID	Theme	Representation	Applicant's Response
		combined projects have to be taken into account. • Solar developments totalling 18,000 acres between Ashwellthorpe and Diss have been proposed – this represents destruction at a landscape scale affecting at least a generation of inhabitants. • None of these projects have any benefits to local people or wildlife.	as detailed within ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116].

2.10 Great Moulton Action Group

Table 2.10 Applicant's Response to Great Moulton Action Group [\[RR-0705\]](#)

ID	Theme	Representation	Applicant's Response
GMAG-001	Examination process	Great Moulton Action Group (GMAG) registers as an Interested Party because the proposed East Pye development would have significant impacts on the village of Great Moulton and its surrounding rural environment.	The Applicant welcomes continued engagement with stakeholders and community groups throughout the Examination process. Information relating to the Scheme, including the application documents, is publicly available on the Planning Inspectorate's website. The full suite of application documents can be accessed via the Examination Library, including the Consultation Report [APP-024] and the Environmental Statement (ES) [APP-035 to APP-195]. Interested Parties may review these documents and participate in the Examination in accordance with the procedures set out by the Examining Authority.
GMAG-002	General concerns	GMAG is concerned about the scale and proximity of the infrastructure, including potential noise, vibration, traffic and landscape effects on the community.	The Applicant notes Great Moulton Action Group's concerns regarding scale, proximity, noise, vibration, traffic and landscape effects. These matters are assessed in the relevant topic chapters of the Environmental Statement, including ES Volume 1, Chapter 7 – Landscape & Visual [APP-043], ES Volume 1, Chapter 11 – Transport and Access [APP-047] and ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Mitigation is secured

ID	Theme	Representation	Applicant's Response
			through the outline management plans and Requirements in Schedule 2 of the Draft DCO [AS-032] .
GMAG-003	Ecology and Biodiversity	We are also concerned about the impact on local wildlife, including bats, birds and species that rely on the intact agricultural, hedgerow and woodland habitats around the village.	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including designated sites for nature conservation, protected and notable habitats and species. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2 Figure 4.1 Indicative Masterplan [APP-059] have been applied to retain, protect and enhance ecological assets. They include for the retention and enhancement of field boundary features (hedgerows/ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats and birds. Large areas of intensively managed arable land will be removed from intensive cultivation as a result of the Scheme, with the cessation of fertiliser application, pesticide and herbicide use, and converted to grassland mosaics, managed for the benefit of biodiversity including, but not limited to, species of farmland birds,

ID	Theme	Representation	Applicant's Response
			including skylark <i>Alauda arvensis</i> . Further information regarding the creation of habitats within the Scheme is provided within the Outline Landscape and Ecological Management Plan (Outline LEMP) [APP-199] .
GMAG-004	EIA Methodology	GMAG considers that the applicant has materially underestimated the archaeological, hydrological, environmental and cumulative impacts of the scheme, and that key conclusions within the Environmental Statement do not reflect the sensitivity of the site or the risks to the surrounding community.	The ES [APP-036 to APP-195] and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112]. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters of the Scheme. The Environmental Statement therefore assesses the likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme. The proposed management and mitigation measures set out in the ES [APP-036 to APP-195] are secured through various outline management plans [APP-196 to APP-205]. The mitigation measures are identified in light of the effects identified during the assessment. The assessment considers both the sensitivity of the site and results to the surrounding community. The detailed management plans will be substantially in accordance with the outline management plans and are

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			secured through Schedule 2 of the Draft DCO (Draft DCO) [AS-032] . These detailed management plans will be submitted to and approved by the relevant planning authority.
GMAG-005	Examination process	GMAG will submit a full written representation setting out detailed evidence and analysis during the Examination.	The Applicant notes this comment and welcomes further engagement with GMAG throughout the Examination process.
GMAG-006	General comments	Great Moulton Action Group (GMAG) is a local, community-based group formed by residents of Great Moulton and the surrounding rural parishes in response to the East Pye Solar Farm proposal and the associated 400kV grid infrastructure. The group brings together residents with long-standing local knowledge of the landscape, history, water environment, agricultural setting and rural road network, as well as members whose professional experience in engineering, health and safety, community work and communications strengthen our ability to scrutinise the proposal. GMAG also reflects the concerns of a wider network	The Applicant makes note of this comment and that GMAG is supportive of the principle of renewable energy developments. The Applicant's position is that the Scheme is environmentally responsible, technically justified and compliant with national policy and legal requirements, and that this is well-evidenced within the Environmental Statement [APP-035 to APP-195], Planning Statement [APP-209] and Policy Compliance Document [APP-210]. The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The acceptance of the Applicant's application for

ID	Theme	Representation	Applicant's Response
		of local people who have engaged with the issues raised by the scheme. GMAG is not opposed to renewable energy or the transition to low-carbon infrastructure. We support well-designed, appropriately sited renewable projects that are environmentally responsible, technically justified and compliant with national policy and legal requirements. Our concerns arise because the East Pye proposal does not meet these standards. GMAG stands for: • Evidence-based decision-making — ensuring that major infrastructure is supported by a complete, accurate and lawful Environmental Statement and a transparent alternatives appraisal. • Protection of the local environment — including groundwater, private water supplies, agricultural land, ecology, landscape character and heritage assets. • Community safety and resilience — particularly in relation to BESS fire risk, emergency access, drainage,	examination by the Planning Inspectorate serves as confirmation that the Applicant has fulfilled its statutory pre-application duties. Detailed responses to the points raised are provided in responses below.

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		contamination pathways and the cumulative effects of co-located infrastructure. • Fairness and proportionality — ensuring that compulsory acquisition powers are only granted where fully justified and where no less harmful alternatives exist. • Accountability and transparency — holding applicants to the standards required under the Planning Act 2008, the EIA Regulations and the relevant National Policy Statements. GMAG's purpose is to provide informed, constructive and robust scrutiny of the East Pye proposal, to ensure that the Examining Authority has access to accurate local knowledge, and to represent the interests of the community throughout the NSIP process. Our submissions are grounded in policy, evidence and the lived experience of those who know the area best.	
GMAG-007	Need for the Scheme	GMAG submits that the East Pye Solar Farm and associated 400kV grid infrastructure cannot be considered acceptable, justified or environmentally	The Statement of Need [APP-206] sets out the government's policy position that there is a critical national priority for the provision of nationally significant low carbon infrastructure, which includes large-scale

ID	Theme	Representation	Applicant's Response
		sound on the basis of the material presented by the applicant. The scheme now before the Examination is a large, complex and high-impact industrial energy installation, yet the applicant has not demonstrated a proven need for it, has not carried out a lawful or environmentally led alternatives appraisal, and has not produced an Environmental Statement that meets the requirements of the EIA Regulations or the expectations of the relevant National Policy Statements. The applicant's own documentation confirms that the Clean Power 2030 regional capacity ranges for solar generation are already met by other prioritised schemes in both the Central England and East Anglia transmission regions. In this context, national policy does not establish a need for this specific 500MW solar-plus-storage complex at Great Moulton. The need case is further weakened by the absence of a confirmed connection date for the BESS, despite the applicant	solar farms such as the Scheme. It also explains that the starting point for all assessments of applications for energy infrastructure types which are covered by the NPSs is that substantial weight is given to the need for such schemes (NPS EN-1, Paragraph. 4.2.19). Section 7.6 and Section 7.7 of the Statement of Need [APP-206] explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035 (i.e. without the Scheme, the national and regional capacity ranges would not be met). Further, the Applicant notes that the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). This is because, as Section 4.3 of the Statement of Need [APP-206] explains, current levels of national electricity demand are expected to double to electrify transport and other non-electricity sector demand. Regional electricity demand is likely to grow at a similar rate to national electricity demand, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030. Section 7.3 of the Statement of Need [APP-206] sets out the challenge to deliver net zero regionally and

ID	Theme	Representation	Applicant's Response
		relying on its operation to justify claimed system benefits.	underpins the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand. Within this context of a clear national and regional need for the Scheme, it is clear that seeking to maximise the benefits arising from the Scheme is aligned with the government's energy policy. The Applicant seeks to maximise the decarbonisation, energy security and affordability benefits arising from the Scheme from available and suitable land and through its contracted grid connection. The Scheme is being proposed to meet the need established in NPS EN-1. Factors considered in the site selection process are explained in the Site Selection Assessment [APP-215]. These include consideration of planning, environmental and operational factors in the search for suitable sites. These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3. Consideration has included both technical constraints (i.e. proximity to grid connection, site size, compatibility of land uses) and consideration of the avoidance and reduction of environmental impacts by excluding ecological, landscape and heritage designations. See National Grid Electricity Transmission Plc's Relevant Rep (RR-1408) and the Applicants response

ID	Theme	Representation	Applicant's Response
			at NGET-006 and NGET-007 in the Applicant's Response to Relevant Representations Part 2 [EN0110014/EXAM/8.7] which sets out information regarding the Applicants grid connection for the generating station and the BESS.
GMAG-008	Policy Compliance National Grid Substation	The siting of the National Grid 400kV substation, project substation, BESS compound and associated overhead line works has not been justified through a transparent, criteria led or environmentally led alternatives appraisal. Landowner willingness has been used as a primary filter, contrary to Regulation 14 and the expectations of NPS EN1 and EN5. The escalation of the project substation from 132kV to 400kV, together with the relocation of the 400kV National Grid substation from Site 1A to Site 1B, has not been accompanied by a reassessment of alternative locations, technologies or lower-impact configurations such as GIS. The Horlock Rules have not been properly applied.	As detailed in the Site Selection Assessment [APP-215], the Applicant has followed a staged approach to site selection, with consideration to a range of planning, environmental and operational factors and the project objectives. Factors considered in the site selection process are given in the Site Selection Assessment [APP-215]. This includes consideration of planning, environmental and operational factors in the search for suitable sites. These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3. Land availability (i.e. the participation, or willingness of landowners) is a key consideration for site selection, as without willing landowners, acquiring land through compulsory acquisition powers would be necessary, which the Applicant is keen to avoid as far as practicable. During design evolution, the Project Substation located in Sub-Site 1B was upgraded from a 132kV to 400kV Project Substation. This change was consulted on during the Targeted Consultation in Autumn 2025.

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			Further details of the Targeted Consultation can be found in the Consultation Report [APP-024] and Consultation Report Appendix 9: Targeted Consultation Materials [APP-033]. The parameters of the 400kV Project Substation are set out in Design Principles, Parameters and Commitments [APP-213] and assessed as part of the Scheme within the Environmental Statement [APP-036 to APP-195]. The Applicant's approach to the site selection of the National Grid Substation is set out within the Site Selection Assessment [APP-215], which had regard to the Holford and Horlock Rules. The Design Approach Document [APP-212] further sets out the refinement of the location of the National Grid Substation from the options presented at Statutory Consultation. Consideration was also given to a number of alternative locations for the new National Grid Substation, and these are summarised in ES Volume 1 Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041].
GMAG-009	Environmental Statement	The Environmental Statement is incomplete, outdated and not reflective of the scheme now proposed. Key baseline surveys are missing, including private water supplies, groundwater, hydrology, ecology, noise, landscape and cumulative effects. No assessment	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]). The requisite surveys have been

ID	Theme	Representation	Applicant's Response
		has been undertaken of BESS firewater, PFAS contamination, transformer oil risks, groundwater vulnerability, or the combined impacts of the Great Moulton and Tivetshall St Margaret infrastructure cluster. Several ES chapters assess an earlier configuration and cannot be relied upon.	undertaken in accordance with the ES Volume EIA Scoping Opinion [APP-114]. They set out in ES Volume 1, Chapter 7 – Landscape & Visual [APP-043], Chapter 9 – Water Environment [APP-045], Chapter 12 Noise and Vibration [APP-048] and Chapter 16 Ground Conditions [APP-052]. Risks associated with the BESS are set out in the Outline Battery Safety Management Plan [APP-200]. These chapter set out the approach to assessment for all topics raised. The Applicant considers that ES Volume 1, Chapters 4 - The Scheme [APP-040] and Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] provide a clear and accurate description of the Scheme and design evolution. ES Volume 1, Chapter 4 – The Scheme [APP-040] details the Scheme parameters considered by the technical authors as part of the EIA to assess realistic worst-case effects for each potential receptor. Topic chapters detail assumptions and limitations where relevant. The ES is therefore reflective of the Scheme proposed. The design of the development and in turn the environmental assessment follow the principles of the Rochdale Envelope, which allows for flexibility within the project proposals whilst allowing for the assessment of the worst-case scenario.

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GMAG-010	Scheme Description	The applicant's use of the generic label "Southern Cluster" further illustrates the lack of clarity and transparency in the documentation. This terminology obscures the identity of the villages of Great Moulton, Tivetshall and Wacton, presenting a settled landscape as if it were an anonymous land parcel. These risks downplaying the presence of established communities and misrepresenting the human environment affected by the proposed development.	The Applicant draws attention to the fact that receptors have been specifically identified within each technical chapter of the ES [APP-036] to [APP-195], with named settlements and individual visual receptors considered where relevant. For example, ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] identifies visual receptors within Great Moulton, Tivetshall and Wacton by name, supported by the Residential Visual Amenity Assessment [APP-148] and Public Rights of Way Visual Amenity Assessment [APP-149]. ES Volume 1, Chapter 12 – Noise and Vibration [APP-048], supported by ES Volume 2, Figure 12.2 – Noise and Vibration Sensitive Receptors [APP-099], identifies named noise-sensitive receptors within the vicinity of the Scheme. The Applicant further draws attention to ES Volume 1, Chapter 14 – Socio-Economics [APP-050], which considers effects on the local area and communities, informed by responses to consultation from parish councils including Great Moulton Parish Council. The Equality Impact Assessment [APP-214] additionally identifies the named villages within the Study Area that will be impacted by the Scheme, including Great Moulton. The Applicant considers that the ES has clearly identified the receptors and settlements affected by the Scheme in accordance with the requirements of the EIA Regulations, NPS EN-1 and NPS EN-5.

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GMAG-011	Draft DCO	The Draft DCO seeks wide-ranging compulsory powers despite unresolved environmental risks, an unproven need case, and insufficient evidence of funding or deliverability. The statutory tests for compulsory acquisition have not been met.	Please refer to the Applicant's Responses at GMAG-009 and GMAG-010 in relation to GMAG's comments on the environmental assessment. ES Volume 1, Chapter 5 - Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215] outline the approach to site selection undertaken by the Applicant. Paragraph 4.3.24 in NPS EN-1 provides: "The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals." There is no general requirement in NPS EN-1 to consider alternatives or establish that the proposed Scheme represents the best option from a policy perspective. The Statement of Reasons [APP-020] sets out the reasons there is a compelling case in the public interest for the land or rights over the land to be compulsory acquired, for example, the meaningful and timely contributions offered by the Scheme to help meet the urgent need for new energy infrastructure in the UK, providing enhanced energy security and supporting UK

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			Government priorities in relation to economic development and security of supply. The power to acquire the Order land or rights over the Order land and the power to impose restrictions are required for the purposes of, to facilitate or are incidental to, the Scheme and are no more than are reasonably necessary. The Applicant recognises that the Draft DCO has the potential to infringe the human rights of people who own property or have rights in the land proposed to be acquired pursuant to the Draft DCO. The Statement of Reasons sets out that any infringement on human rights of those whose interests are affected by the inclusion in the DCO of powers of compulsory acquisition, is proportionate, necessary and legitimate and is in accordance with national and European law. Compensation is payable to anyone whose rights are extinguished, suspended or interfered with. Further, within the context of an urgent need for an unprecedented capacity of new low-carbon generation to meet Government's aims (NPS EN-1 Paragraph 2.3.3) it is clear that seeking to maximise the benefits arising from an individual scheme is aligned with the government's energy policy. The Applicant seeks to maximise the benefits arising from the Scheme from available and suitable land and

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			through its contracted grid connection. The proposed Order Limits enable the Scheme to deliver the benefits identified in ES Volume 1, Chapter 6 - Climate Change [APP-042] and the requirement for that land is therefore justified as going towards meeting the need established in NPS EN-1. Such benefits may not be realised if compulsory acquisition powers are not granted. Including compulsory acquisition powers in the DCO ensure that there is no impediment to realising the public benefits of the Scheme. The purpose for which the land and rights are sought (to build and operate the Scheme) is legitimate, necessary and proportionate.
GMAG-012	Scheme Need	Taken together, these deficiencies mean that the application does not provide the Examining Authority with the information required to undertake a lawful assessment under the Planning Act 2008. GMAG therefore submits that substantial negative weight must be attached to the applicant's case unless and until a complete, updated and regulation-compliant Environmental Statement and alternatives appraisal are provided. On the evidence available, the scheme is not justified, not environmentally acceptable, and not suitable for development consent.	As set out above, the Applicant's position is that the Environmental Statement [APP-036 to APP-195] for the Scheme is legally compliant with national policy. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] set out how the Scheme complies with relevant national and local planning policies.

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GMAG-013	Scheme Need	GMAG submits that the applicant has not demonstrated a clear or compelling need for the proposed 500MW solar and storage complex at Great Moulton. The applicant relies heavily on broad national policy support for solar generation, but does not show why this particular scheme, in this particular location, is necessary, proportionate or justified. The applicant's own documentation acknowledges that the site lies on the boundary between the Central England and East Anglia transmission regions. According to the applicant, the NESO Connections Reform process has already prioritised sufficient solar capacity to meet the Clean Power 2030 regional ranges for 2035 in both regions. This is a significant admission: if regional capacity ranges are already met by other prioritised schemes, the need for this additional 500MW scheme cannot simply be inferred from national policy statements about optionality or future attrition.	The Applicant refers to its response to GMAG-007 above. Specifically, Section 7.6 and Section 7.7 of the Statement of Need [APP-206] explain that the solar component of the Scheme has been prioritised by NESO as part of their ongoing grid reforms with a Gate 2 connection offer. This means that NESO have included the Scheme within the list of schemes which have been prioritised to satisfy the current relevant regional solar capacity range to 2035 (i.e. without the Scheme, the national and regional solar capacity ranges would not be met). It is therefore not the case that "regional capacity ranges are already met by other prioritised schemes." Further, the Applicant notes that the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). NPS EN-1 and NPS EN-3 establish the national need for renewable energy infrastructure and provide the overarching policy framework in support of the delivery of solar generation projects. In accordance with this policy framework, the Site Selection Assessment [APP-215] sets out the Applicant's staged approach to site selection, which was informed by the factors

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			influencing site selection and design identified in Section 2.10 of NPS EN-3. The factors considered in the site selection process are set out in the Site Selection Assessment [APP-215]. These include planning, environmental and operational considerations in the search for a suitable site capable of delivering the Project and contributing towards the need identified in national policy. Consideration included both technical constraints (such as proximity to grid connection infrastructure, site size and land use compatibility) and the avoidance and reduction of environmental impacts through the exclusion of ecological, landscape and heritage designations. Through this process, a suitable site was identified that is capable of facilitating a solar development in accordance with the objectives and requirements of NPS EN-1 and NPS EN-3. The Scheme is needed to contribute to meeting “<i>the urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.</i>” (NPS EN-1, Para 3.3.58).
GMAG-014	Site Selection and Alternatives	The Environmental Statement (ES) Chapter 5 frames the alternatives appraisal around an asserted “clear and urgent need” for the scheme at the proposed scale. It states that even a smaller development was not taken	The Applicant refers to its response to GMAG-013. Specifically, that the Scheme is one of those schemes listed in NESO’s re-prioritisation of the Connection Queue to meet the current capacity ranges.

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		forward as a reasonable alternative. This reverses the proper test. If regional capacity ranges are already met, the applicant must demonstrate why a large, highly constrained scheme—one with substantial unresolved impacts on ecology, groundwater, heritage, agricultural land, transport and residential amenity—should nevertheless be treated as necessary and proportionate in this location.	In line with NPS EN-1, the Applicant has not considered a smaller scheme as a reasonable alternative. Paragraph 4.3.23 of NPS EN-1 states: <i>'The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.'</i> Paragraph 4.3.27 further states: <i>'Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.'</i> The Applicant considers that the assessment of alternatives provided in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] has been carried out in a proportionate manner and has only considered alternatives that can meet the objectives of the Scheme.
GMAG-015	Grid connection	The justification for the co-located Battery Energy Storage System (BESS) is also uncertain. The applicant's Statement of Need confirms that the BESS currently holds only Gate 1 status and has no confirmed indicative	A BESS is proposed as associated development to the main Solar PV Sites and will support their operation. The benefits arising from the BESS are set out in Sections 5.11, 6.9, and 6.10 of the Statement of Need [APP-206].

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		connection date. Yet the claimed benefits of flexibility and resilience rely on the storage element being operational. A need case that depends on infrastructure without a confirmed connection date is inherently contingent.	Paragraph 6.9.3 of the Statement of Need [APP-206] explains that <i>"Solar schemes may be developed as standalone schemes or may be co-located with storage or other generation technologies. Both standalone and co-located schemes will play essential roles in contributing to the three pillars of energy policy: decarbonisation, security of supply, and affordability."</i> The Energy NPSs strongly support low-carbon generation schemes, as the Applicant has clarified in its response to GMAG-007 above. NPS EN-1 also provides strong support for flexible assets, such as BESS (for example, paragraphs 3.3.5, 3.3.6, 3.3.25) and NPS EN-3 paragraph 2.10.24 provides that <i>"Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolyzers) to maximise the efficiency of land use."</i> The Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). Upon receiving consent for the Scheme (if granted) the Applicant would re-submit the BESS component of the Scheme to a future re-prioritisation round to seek a Gate 2 connection offer (firm connection date) for the

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			BESS. See National Grid Electricity Transmission Plc's Relevant Rep (RR-1408) and the Applicants response at NGET-006 and NGET-007.
GMAG-016	Scheme Need	National policy establishes a general need for low-carbon energy infrastructure; it does not establish that this specific scheme is required in a region where the applicant acknowledges that capacity ranges are already met by other prioritised projects. Nor does it justify placing a major grid hub and 500MW solar plus storage complex in a location with such significant environmental, hydrological, safety and community constraints.	The Applicant refers to its response to GMAG-013 above. NPS EN-3 explains that the availability of grid connection, suitable irradiance levels, and local topography, among other factors, are factors in the consideration of site selection. NPS EN-1 and NPS EN-3 establish the national need for renewable energy infrastructure and provide the overarching policy framework in support of the delivery of solar generation projects. In accordance with this policy framework, 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 identified in Section 2.10 of NPS EN-3. Factors considered in the site selection process is given in the Site Selection Assessment [APP-215]. This includes consideration of planning, environmental and operational factors in the search for suitable sites. Consideration has included both technical constraints (i.e. proximity to grid connection, site size, compatibility of land uses) and the avoidance and reduction of environmental impacts by excluding ecological, landscape and heritage designations.

ID	Theme	Representation	Applicant's Response
			The Statement of Need [APP-206] provides evidence to support the suitability of the proposed location of the Scheme in relation to transmission network regional capacity, electricity networks, grid suitability and connection points. It concludes that the location of the Scheme is well suited to support the UK's energy needs and that the proposed connection point is appropriate.
GMAG-017	Scheme Need	Planning Weight: GMAG submits that the need case is unproven, regionally unsupported and insufficient to outweigh the substantial and unresolved harms associated with the scheme. Limited weight should be attached to the applicant's asserted need.	The Applicant refers to its response to GMAG-007 above. As set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that there are no residual significant adverse effects of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse effects identified are clearly outweighed by the substantial public benefits that would arise from providing low carbon energy to meet the needs identified by NPS EN-1.
GMAG-018	Draft DCO	GMAG is concerned that the Draft DCO (DCO) seeks powers that extend far beyond what the applicant has justified through evidence. The Order would authorise a very broad development envelope, including the generating station, the BESS compound, the project substation, the new National Grid 400kV substation, grid connection	The Design Principles, Parameters and Commitments [APP-213] set out the maximum and, where necessary, minimum parameters with the spatial extents shown on the Works Plan [AS-002 and AS-003] . The Scheme has Work Nos as described in Schedule 1 of the Draft DCO and does not have a detailed design at this stage.

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		works, mitigation areas, access alterations, street works, temporary possession, compulsory acquisition and traffic regulation powers. This breadth is significant because the applicant has not presented a fixed, fully evidenced or environmentally secured scheme. Instead, the DCO is being used to defer key matters to later stages, including issues central to environmental protection, groundwater safety, design certainty, operational risk and practical deliverability. A DCO should not function as a blanket permission for unresolved or undefined infrastructure, particularly where the site is environmentally sensitive and the impacts are substantial.	The Applicant is seeking flexibility in design parameters to allow for technological advancement to maximise energy production. For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and allow for a decision on the technology choice to be made at the point of procurement. The Planning Inspectorate's Advice Note Nine: Rochdale Envelope acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme to be considered. The outline management plans establish a framework for the details to be secured through the DCO Requirements, given the need for flexibility to take into account detailed design, construction methodologies, logistics and programming, technology advances and evolution in best practice. The approved detailed management plans must be substantially in accordance with the outline management plans. The final plans will be submitted to and approved by the relevant planning authority, in consultation with relevant statutory consultee, where specified in the Draft DCO [AS-032]. The approval of

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			the detailed management plans is secured by the Requirements in the Draft DCO [AS-032]. Paragraph 2(4) of Schedule 15 to the Draft DCO [AS-032] requires the Applicant to confirm when submitting the final plan for approval whether it would give to any materially new or materially different environmental effects in comparison with those reported in the Environmental Statement. This ensures that any mitigation measures identified in the ES are contained in the final plans or an explanation is provided as to why there is a change (for example, if a mitigation measure is no longer required as technology has advanced and the impact will no longer occur).
GMAG-019	Draft DCO	The applicant's approach effectively asks the Examining Authority to grant extensive compulsory powers for a scheme whose need is unproven, whose regional justification is disputed, and whose environmental controls remain heavily reliant on outline documents and post-consent refinement. This undermines the principle of informed decision-making that underpins the DCO process. The Planning Act 2008 does not permit the grant of a Development Consent	Please refer to the responses above in relation to the DCO process (GMAG-001). The Scheme has been prepared in accordance with the Planning Act 2008, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The acceptance of the Application for Examination by the Planning Inspectorate serves as confirmation that the statutory pre-application duties, including the provision of adequate environmental information, have been fulfilled.

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		Order where the environmental information is incomplete or where key matters are deferred to post-consent stages. A DCO cannot function as a placeholder for unresolved design, safety or environmental issues.	
GMAG-020	Draft DCO	Planning Weight: GMAG submits that the scope of the Draft DCO reinforces, rather than resolves, concerns about need, deliverability and environmental risk. Significant negative weight should be attached to the applicant's reliance on broad, undefined and deferred powers.	The 'scope' of the Draft DCO has been considered and assessed in the ES [APP-036 to APP-195] and the other documents that support the Application, and which has been undertaken by competent experts. As set out in the response to GMAG-018 above, the approval of the detailed management plans is secured by the Requirements in the Draft DCO [AS-032].
GMAG-021	Compulsory Acquisition	GMAG submits that the case for compulsory acquisition has not been adequately demonstrated. The applicant has not provided clear, quantified or transparent funding information for the land and rights it seeks to acquire, nor has it shown that taking Sub Site 1B and the associated permanent rights is necessary or proportionate once environmental constraints, alternatives and cumulative impacts are properly considered.	The Applicant's case in respect of need is set out in the Statement of Need [APP-206]. The Applicant's goal is to deliver the Scheme on land where the owner has voluntarily agreed to its use. Meaningful conversations have helped inform the design which in turn assists in avoiding people's land, including homes and gardens. As is standard in NSIP solar schemes, the Draft DCO [AS-032] includes provision for compulsory acquisition of land and rights. These powers sought are necessary and proportionate to ensure the deliverability of the Scheme. The Applicant draws attention to paragraph 4.1.8 of NPS EN-1, which includes provision for compulsory

ID	Theme	Representation	Applicant's Response
		Compulsory acquisition is a serious intervention that requires a fully evidenced justification. The applicant must demonstrate: • a compelling case in the public interest • that the land is necessary for the development • that there are no reasonable alternatives • that funding is secure and deliverable The statutory tests under sections 122 and 123 of the Planning Act 2008 are strict and cumulative. Failure to demonstrate necessity, proportionality or funding certainty is fatal to the grant of compulsory acquisition powers.	acquisition of land or rights over that land, applications for which will be considered by the Secretary of State under the usual compulsory acquisition principles. The rights being sought to construct, operate and decommission the Scheme are set out in the Statement of Reasons [APP-020] and the Book of Reference [APP-022], as supported through the Land and Rights Negotiation Tracker [APP-023]. The Statement of Reasons [APP-020] sets out the case for compulsory acquisition and demonstrates how the statutory tests under sections 122 and 123 of the Planning Act 2008 are met, including that there is a compelling case in the public interest, that the land is required for the development, and that all reasonable alternatives to compulsory acquisition have been explored. The Funding Statement [APP-021] demonstrates that the Scheme is financially viable and adequately funded for the Scheme to be delivered in full, including the funding required for compulsory acquisition. The Applicant's approach to the site selection of the National Grid Substation, including consideration of Sub-Site 1B, is set out within the Site Selection Assessment [APP-215], which had regard to the Holford and Horlock Rules and concluded that the alternative locations for the National Grid Substation had either similar or more constraints than the chosen location in Sub-Site 1B.

ID	Theme	Representation	Applicant's Response
GMAG-022	Compulsory Acquisition	At this stage, the applicant has not demonstrated that the land in question is the only viable or least harmful location for the proposed grid infrastructure. Without a robust alternatives assessment and without clarity on the financial provision for long-term obligations, the statutory tests for necessity and proportionality are not met. Planning Weight: GMAG submits that the Examining Authority should give significant negative weight to the absence of a clear funding case and the lack of demonstrated necessity for compulsory acquisition at this location.	The approach taken to site selection is set out in the Site Selection Assessment [APP-215], which describes the approach to identifying land for a new National Grid Substation, Point of Connection and solar sites. The approach and appraisal of reasonable alternative sites to the National Grid Substation and identification of areas for solar development considering relevant policy is set out in the Site Selection Assessment [APP-215], and the reasonable alternatives studied by the Applicant are described in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-014]. Notably, the National Grid Substation siting assessment approach has had regard to the 'Horlock Rules. The Funding Statement [APP-021] demonstrates that the Scheme is financially viable and adequately funded for the Scheme to be delivered in full.
GMAG-023	Site Selection	GMAG is concerned that the applicant's site selection and alternatives appraisal has not been revisited or strengthened following the major redesign of the grid infrastructure. The decision to introduce a full 400kV National Grid substation—co-located with the project substation, BESS infrastructure, pylons, access works and associated equipment—fundamentally alters the scale, footprint,	The site selection process for the National Grid Substation has been the subject of a detailed, criteria-led assessment as set out in the Site Selection Assessment [APP-215] and summarised in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]. As set out in the Site Selection Assessment [APP-215], the Applicant engaged with National Grid Electricity Transmission (NGET) to discuss available

ID	Theme	Representation	Applicant's Response
		operational impacts and long-term consequences of the scheme. A 400kV installation is not comparable to a smaller distribution-level substation. It carries different requirements for land take, safety, noise, EMF, drainage, lighting, access and operational risk. Its siting therefore demands a higher level of scrutiny and a transparent, criteria-led assessment of alternatives.	capacity within the transmission network in the Norfolk area. A Point of Connection (PoC) was initially considered at the existing Norwich Main Substation; however, NGET advised that there was neither sufficient existing capacity, nor an opportunity to expand this existing substation, to accommodate the Scheme. Following this, National Grid identified available capacity along the Bramford to Norwich 400kV overhead line between Diss and Norwich, and confirmed that a new National Grid Substation would be required to connect the Scheme to the transmission network. The requirement for a new 400kV National Grid Substation, together with the co-located Project Substations, BESS, access works and associated infrastructure, has therefore been an integral part of the Scheme design since the identification of the PoC and is not the result of a subsequent redesign. The site selection assessment for the National Grid Substation has been undertaken in accordance with the 'Horlock Rules' (as set out in 'The National Grid Company plc's NGC Substation and the Environment: Guidelines on Siting and Design'), as described in Section 3 of the Site Selection Assessment [APP-215]. Possible locations for the new National Grid Substation were studied, with the area to the south of Great Moulton, off Station Road and beneath the Bramford to Norwich 400kV overhead line, deemed the most viable, having regard to its close proximity to the 400kV overhead line and the A140, together with

ID	Theme	Representation	Applicant's Response
			highway visibility and the ability for the roads to accommodate Abnormal Indivisible Loads. As set out in the Site Selection Assessment [APP-215], the proposed National Grid Substation Site can be suitably accessed from the SRN, is not located within any statutory ecological, landscape, or heritage designations, and sits entirely within Flood Zone 1. Alternative sites for the PoC and National Grid Substation have been considered in Section 3 of the Site Selection Assessment [APP-215] and none found to be more preferable to the chosen location at Site 1B. The Applicant further draws attention to the fact that the operational impacts of the National Grid Substation, together with the co-located Project Substations, BESS, access works and associated infrastructure, have been fully assessed within the ES [APP-036 to APP-195], on the basis of the maximum design parameters set out in the Design Principles, Parameters and Commitments [APP-213] (the Rochdale Envelope approach).
GMAG-024	Site Selection	The material available indicates that the selection of Site 1 / Sub Site 1B was shaped heavily by land availability, landowner willingness and prior land assembly, rather than by a neutral comparison of reasonable alternatives.	The Applicant draws attention to the fact that the site selection process for both the National Grid Substation and the solar sites has been undertaken in accordance with the factors influencing site selection set out in Section 2.10 of NPS EN-3 and the Horlock Rules, as detailed in the Site Selection Assessment [APP-

ID	Theme	Representation	Applicant's Response
		This is not consistent with the principles of a lawful alternatives appraisal, which must begin with identifying environmentally and technically suitable locations before considering land control or commercial convenience.	215] and summarised in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]. The Applicant draws attention to paragraph 4.3.9 of NPS EN-1, which expressly confirms that there is no general policy requirement for an applicant to consider alternatives or to establish that the proposed project represents the best option from a policy perspective. The Applicant draws attention to the fact that land availability is an important consideration in the site selection process because it is preferable that land is leased rather than permanently acquired, given that solar farms comprise temporary structures. Without willing landowners, acquiring land through compulsory acquisition powers would be necessary, which the Applicant has sought to avoid as far as practicable while still delivering a suitable Scheme. Notwithstanding the identification of Sub-Site 1B and the wider solar sites, the Site Selection Assessment [APP-215] demonstrates that a robust and criteria-led alternatives assessment has been undertaken, considering environmental, technical, planning and operational factors.
GMAG-025	Site Selection	4.1. Legal and Policy Framework	Paragraph 2 of Schedule 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires ' <i>a description of the reasonable alternatives studied by the applicant, which</i>

ID	Theme	Representation	Applicant's Response
		Regulation 14 of the EIA Regulations requires the ES to: - describe the reasonable alternatives studied - explain the reasons for selecting the chosen option - compare the environmental effects of each option NPS EN-5 requires applicants to apply the Horlock Rules at an early stage, ensuring that environmental considerations drive site selection rather than follow it. The applicant has not demonstrated compliance with these requirements. Regulation 14 requires a transparent, criteria-led alternatives appraisal. Case law confirms that alternatives must be assessed before land control or commercial convenience is considered. Relevant Case Law - Smith v Secretary of State [2015] EWHC 2473 (Admin) — alternatives must be assessed transparently and at the correct	<i>are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment'.</i> The requirements of the EIA Regulations have been addressed within ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215], which together describe the reasonable alternatives considered, explain the reasons for selecting the chosen option and compare the environmental effects of each option. ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] describes the reasonable alternatives considered, including alternative generation technologies, alternative sites for the Point of Connection and National Grid Substation, alternative sites for the solar development, and design evolution alternatives (including the BESS, Cable Route Corridor, Green Infrastructure and access). The Site Selection Assessment [APP-215] sets out the detailed six-stage assessment process undertaken to identify and evaluate potential sites, applying environmental, planning, technical and operational criteria consistent with section 2.10 of NPS EN-3, and NPS EN-1 and NPS EN-5. This includes the mapping and exclusion of national and international ecological and geological designations, ancient woodland, Flood Zones 2 and 3,

ID	Theme	Representation	Applicant's Response
		stage; land control cannot dictate the appraisal. • R (Save Stonehenge) v Secretary of State [2021] EWHC 2161 — failure to consider reasonable alternatives renders a decision unlawful. • Bowen-West v SSCLG [2012] EWCA Civ 321 — decision-makers must have sufficient environmental information to understand likely significant effects.	nationally designated landscapes, designated heritage assets, proximity to sensitive human receptors, agricultural land classification and topography. The Applicant considers this satisfies the requirements of Regulation 14 to describe the reasonable alternatives studied, explain the reasons for the chosen option and compare their environmental effects. In respect of NPS EN-5 and the Horlock Rules, the Applicant draws attention to Section 3 of the Site Selection Assessment [APP-215], which sets out how the site selection process for the National Grid Substation has been informed by the Horlock Rules (as set out in 'The National Grid Company plc's NGC Substation and the Environment: Guidelines on Siting and Design'). The site selection considered proximity to the 400kV overhead line, accessibility, environmental constraints, avoidance of major designated ecological and cultural sites, proximity to sensitive receptors and topography. As set out in the Site Selection Assessment [APP-215], the proposed National Grid Substation Site can be suitably accessed from the SRN, is not located within any statutory ecological, landscape, or heritage designations, and sits entirely within Flood Zone 1. The National Grid Substation and overhead lines would therefore avoid areas of high amenity, cultural, and scientific value in line with the Holford / Horlock Rules

ID	Theme	Representation	Applicant's Response
			and NPS EN-5. The Horlock Rules have therefore been applied from the earliest stage of the site selection process, and environmental considerations have driven site selection rather than followed it. As part of the design evolution, the National Grid Substation was reorientated north-south to enable greater opportunities of screening from existing vegetation to the north to reduce the visibility from Great Moulton and provide a greater offset from Narrowgate Way PRow demonstrating that landscape and visual effects have been minimised through iterative design. Finally, the Applicant would appreciate a full citation reference to identify the "<i>Smith v Secretary of State [2015] EWHC 2473 (Admin)</i>" case law being relied upon. The citation provided is not enough to identify the exact case because there are several planning cases involving parties named Smith v Secretary of State, and the available databases do not clearly tie the neutral citation '[2015] EWHC 2473 (Admin)' to a specific "Smith" planning judgment.
GMAG-026	Site Selection	4.2. Influence of Landowner Willingness The alternatives appraisal appears to have been shaped by landowner willingness rather than environmental suitability. Entire search zones were	As set out above, the site selection process, as set out in the Site Selection Assessment [APP-215] and ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], has been undertaken through a staged, criteria-led approach in accordance with NPS EN-3, NPS EN-1 and NPS EN-5.

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		discounted because landowner agreement could not be secured. This reverses the lawful sequence: environmental suitability must come first; land control comes later. 4.2.1 Failure to Assess Lower-Impact Design Alternatives (GIS) The applicant has not demonstrated that it considered Gas Insulated Switchgear (GIS), despite its potential to reduce: 3 land take 4 visual prominence 5 operational lighting 6 fencing and security infrastructure This omission weakens the alternatives appraisal and fails to demonstrate that the chosen AIS layout is the least harmful reasonable option.	Environmental suitability has been considered from the outset, including through the exclusion of nationally designated landscapes, national and international ecological and geological designations, ancient woodland, Flood Zones 2 and 3, designated heritage assets and areas of proximity to sensitive human receptors. Land availability is one of several factors considered as part of the site selection process, but not the predominating factor. As set out in the Site Selection Assessment [APP-215], land availability is a material consideration because it is preferable that land is leased rather than permanently acquired, given that solar farms comprise temporary structures. Without willing landowners, acquiring land through compulsory acquisition powers would be necessary, which the Applicant has sought to avoid as far as practicable while still delivering a suitable Scheme. In respect of the consideration of Gas Insulated Switchgear (GIS) as an alternative to Air Insulated Switchgear (AIS), the Applicant draws attention to the fact that the design and technology specification of the National Grid Substation is a matter for National Grid Electricity Transmission (NGET) as the Transmission Operator, and will be determined at the detailed design stage in accordance with the Grid Connection Agreement and NGET's technical standards. The maximum design parameters for the National Grid Substation are set out in the Design Principles, Parameters and Commitments [APP-213] and

ID	Theme	Representation	Applicant's Response
			secured through Requirement 5 of the Draft DCO [AS-032] . The Environmental Statement adopts the Rochdale Envelope approach, assessing the reasonable worst-case scenario within the parameters set.
GMAG-027	Site Selection	Failure to Properly Apply the Horlock Rules The applicant has not shown that the Horlock Rules were applied at the correct stage or with the required rigour. The appraisal does not demonstrate that: • landscape and visual impacts were minimised • sensitive receptors were avoided • cumulative effects were assessed • alternatives were revisited after the escalation to 400kV	Please refer to the Applicant's response at GMAG-025 and GMAG-023. Cumulative effects have been fully assessed within the Environmental Statement, including the cumulative effects on landscape and visual receptors set out in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043].
GMAG-028	Site Selection	4.4. Failure to Apply Siting Constraints Consistently Constraints that ruled out other locations—narrow lanes, residential proximity, ecological sensitivity, landscape exposure—were treated as	All sites considered, including the site at Sub-Site 1B (south of Great Moulton), have been considered against the same set of environmental, planning and operational criteria. As set out in the Site Selection Assessment [APP-215], the criteria applied included nationally designated landscapes, national and international ecological and geological designations, ancient woodland, Flood Zones 2 and 3, designated

ID	Theme	Representation	Applicant's Response
		manageable at Great Moulton. This inconsistent application of criteria undermines the neutrality of the appraisal.	heritage assets, proximity to sensitive human receptors, agricultural land classification, topography and accessibility. The proposed National Grid Substation Site can be suitably accessed from the SRN, is not located within any statutory ecological, landscape, or heritage designations, and sits entirely within Flood Zone 1. The Applicant considers that the criteria have been applied consistently across the alternatives considered. The Applicant draws attention to Section 3 of the Site Selection Assessment [APP-215], which sets out the alternative sites considered for the National Grid Substation and the reasoning for their discounting. In respect of Sub-Site 1B (Option 4B), consideration was given to accessibility from Station Road, avoidance of the diversion of Public Right of Way Tivetshall St Margaret FP2, screening opportunities from existing vegetation, and the ability to accommodate Abnormal Indivisible Loads. As set out in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], the design of the National Grid Substation was subsequently refined during the design evolution, with the substation reorientated north-south to enable greater opportunities for screening from existing vegetation to the north (reducing visibility from Great Moulton) and to provide a greater offset from Narrowgate Way PRow.

ID	Theme	Representation	Applicant's Response
			The Applicant further draws attention to the fact that the design evolution process, as set out in the Design Approach Document [APP-212] and ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041], has continued to respond to feedback from statutory consultees and members of the community, including in relation to residential proximity, landscape exposure and ecological sensitivity. Embedded mitigation measures for the National Grid Substation and associated infrastructure include design buffers, landscape planting and screening secured through the Design Principles, Parameters and Commitments [APP-213], the Green Infrastructure Strategy [AS-005] and the Outline LEMP [APP-199]. Where residual effects have been identified, these have been fully assessed in the ES [APP-036 to APP-195] and are considered in the planning balance set out in the Planning Statement [APP-209]. The Applicant considers that the site selection criteria have been applied consistently and transparently across the alternatives considered, and that constraints identified at Sub-Site 1B have been addressed through design evolution and embedded mitigation.
GMAG-029	Site Selection Lighting	4.4.1 Dark Skies as a Siting Constraint (CPRE Evidence) ES Figure 7.4 (CPRE England's Light Pollution and Dark Skies Map) confirms that the Great Moulton area, including	The potential effects of the Scheme on the night-time environment, including tranquillity and dark skies, have been considered within the assessment. ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] is supported by ES Volume 2, Figure 7.4 –

ID	Theme	Representation	Applicant's Response
		Site 1, Site 2 and the BESS location, lies within some of the darkest rural skies in Norfolk, with night-time brightness values of 0.25–1 nW/cm²/sr. This corresponds to an E2 Rural Environmental Lighting Zone under ILP GN01 and Norfolk County Council's Environmental Lighting Zones Policy. By contrast, the Maltings site lies within a much brighter zone (4–8 nW/cm²/sr), already characterised by industrial lighting, existing infrastructure and significantly higher ambient illumination. Despite this clear environmental distinction, the Applicant's site selection process did not consider dark-sky sensitivity, did not reference the CPRE dataset, and did not assess the relative lighting impacts of locating a 400kV substation and BESS in a dark rural landscape versus an already illuminated industrial location. This represents a failure to apply siting constraints consistently across all options and is contrary to NPS EN-1, EN-3, ILP GN01 and NCC's Environmental Lighting Zone Policy.	CPRE England's Light Pollution and Dark Skies Plan, which set out the baseline light pollution context of the Order Limits and surrounding area. The ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151] sets out the approach to lighting for the Scheme, including embedded design measures to minimise light spill and glare. The operational lighting for the Scheme has been designed to be minimised in accordance with the Design Principles set out in the Design Approach Document [APP-212] and the Design Principles, Parameters and Commitments [APP-213]. As set out in ES Volume 1, Chapter 4 – The Scheme [APP-040], lighting is not required within the Solar PV Arrays during the operational phase. Lighting of the Project Substations, National Grid Substation and BESS would be in accordance with health and safety requirements, particularly around emergency exits, and would be similar to street lighting that operates from dusk. Lighting has been designed to be directional, downward-facing and controlled to minimise light spill, in accordance with the Institution of Lighting Professionals (ILP) guidance, as set out in the ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]. The site selection process for the National Grid Substation, as set out in the Site Selection Assessment [APP-215], was undertaken in

ID	Theme	Representation	Applicant's Response
			accordance with the factors influencing site selection and design set out in Section 2.10 of NPS EN-3, the Horlock Rules, NPS EN-1 and NPS EN-5. The chosen location at Sub-Site 1B lies beneath the existing Bramford to Norwich 400kV overhead line, close to the A140 and with existing highway infrastructure, and is not within a nationally designated landscape or local landscape designation. As set out in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] , the National Grid Substation was reorientated during the design evolution to enable greater opportunities for screening from existing vegetation to the north, reducing visibility from Great Moulton and providing a greater offset from Narrowgate Way PRoW.
GMAG-030	Site selection	4.5. Uncertainty in National Grid Position Correspondence with National Grid does not confirm that the Great Moulton location is fixed, inevitable or technically validated. This reinforces the need for a transparent, environmentally robust alternatives appraisal. Planning Weight: GMAG submits that the alternatives appraisal is incomplete, inconsistent and insufficient to justify placing a major	The Applicant takes note of this comment. The National Grid site assessment (section 3, Site Selection Assessment [APP-215]) confirms that the National Grid Substation siting assessment approach is based on 'The National Grid Company plc's NGC Substation and the Environment: Guidelines on Siting and Design' (the 'Horlock Rules') which explains the approach taken towards the transmission system of electricity for England to assist those parties responsible for design and locating substations. The grid connection offer received by the Applicant in October 2022 from NESO, working with NGET,

ID	Theme	Representation	Applicant's Response
		400kV grid hub and BESS complex at Great Moulton. Substantial negative weight should be attached to the applicant's site selection case.	contracted the Applicant to provide the land and to gain consent for the proposed new National Grid Substation. 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 of the new substation in an alternative location, the new National Grid substation can be executed via the powers held in the Order and upon the land secured by the Applicant.
GMAG-031	Site Selection National Grid Substation	4.6. Failure to Justify the Rejection of Substation Option 4A The Site Selection Assessment (APP/7.20) identifies two potential locations for the National Grid 400kV substation at Great Moulton: Options 4A and 4B. The Applicant ultimately selected Option 4B. However, the justification provided for rejecting Option 4A is incomplete, inconsistent and contrary to the requirements of Regulation 14 of the EIA Regulations and NPS EN-1. The SSA states that Option 4A was discounted because it overlaps with a separate planning application (2024/3817) submitted by PACE, an	In compliance with Regulation 14 of the EIA Regulations, the alternatives considered by the Applicant have been described in ES Volume 1, Chapter 5 [APP-041]. Table 3.2 of the Site Selection Assessment [APP-215], which set out a comparative RAG-rated appraisal of Options 4A and 4B against the full range of Horlock Rule considerations, including internationally and nationally designated areas, areas of local amenity value, screening from landform and existing features, land use and visual, noise and other environmental effects. The Applicant notes that the discounting of Option 4A was not based solely on the overlap with the consented solar development at 'Land to the North of Station Road Tivetshall St Margaret Norfolk' (ref. 2024/3817), which was approved in June 2025. The scheme is not a speculative or undetermined proposal,

ID	Theme	Representation	Applicant's Response
		entirely unrelated developer. A speculative local planning application has no precedence over a nationally significant infrastructure project, which carries compulsory acquisition powers and national policy support. Rejecting a superior site because a private company has submitted a planning application is not a lawful planning reason and demonstrates that the alternatives appraisal was shaped by developer convenience rather than environmental suitability Option 4A is not adjacent to the village of Great Moulton and would not impose a 400kV substation and BESS compound directly on the settlement edge. In contrast, Option 4B lies only 120–220m from residential properties, introducing significant noise, lighting, visual and amenity impacts. The SSA does not acknowledge or assess this fundamental difference, despite EN-1 and EN-5 requiring applicants to minimise impacts on residential receptors.	but a consented and now committed development that is included as a cumulative development in the assessments reported in the Environmental Statement. The presence of an overlapping consented development on the Option 4A site is a material planning consideration that has practical implications on deliverability. As set out at paragraph 3.5.28 of the Site Selection Assessment [APP-215] and paragraph 5.5.24 of ES Volume 1, Chapter 5 [APP-041], Option 4B within Sub-Site 1B beneath the Bramford to Norwich 400kV line was considered to be favourable in terms of flood constraints, and conflict with the PRoW and given the overlap of 4A with the solar application (ref. 2024/3817), 4A was discounted and 4B taken forward in the DCO application. Proximity to residential receptors was considered within the site selection of the National Grid Substation, alongside other factors. Proximity to dwellings was considered further as part of the design evolution reported in the Design Approach Document [APP-212], where as part of the design evolution, the National Grid Substation was reorientated north - south to enable greater opportunities of screening from existing vegetation to the north to reduce the visibility from Great Moulton and provide a greater offset from Narrowgate Way PRoW and where the existing boundary vegetation in the north western part of Sub-Site 1B would provide a

ID	Theme	Representation	Applicant's Response
			level of screening from residential dwellings associated with Great Moulton. Visual effects are assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and noise effects on nearby sensitive receptors, including from operational plant at the National Grid Substation, are assessed in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048], which concludes that with the implementation of mitigation measures, significant adverse noise and vibration effects at sensitive receptors will be avoided.
GMAG-032	Site Selection National Grid Substation	Option 4A is also located adjacent to existing large-scale infrastructure, including the Maltings and Farmers Barns. EN-1 and EN-5 encourage clustering new energy infrastructure with existing built form to minimise landscape and visual harm. Option 4B is located in open countryside on the village edge, creating a new industrial skyline. This difference is not assessed. From an engineering and transport perspective, Option 4A provides superior access for Abnormal Indivisible Loads (AILs), lying directly beneath the Bramford–Norwich 400kV line and offering straightforward delivery routes. Option 4B does not. Selecting 4B	As set out above, Table 3.2 of the Site Selection Assessment [APP-215] set out a comparative RAG-rated appraisal of Options 4A and 4B against the full range of Horlock Rule considerations, including internationally and nationally designated areas, areas of local amenity value, screening from landform and existing features, land use and visual, noise and other environmental effects. The Applicant notes that the discounting of Option 4A was not based on a single consideration but on a balance of factors including flood constraints and overlap with the solar application (ref:2024/3817). Proximity to dwellings and screening opportunities have been further considered as part of the design evolution reported in the Design Approach Document [APP-212], where as part of the design evolution, the National Grid Substation was reorientated north-south to enable

ID	Theme	Representation	Applicant's Response
		requires the construction of a new access road, a new crossing of Hundred Way, additional land-take, increased HGV movements and greater environmental impact. The SSA does not assess these implications. Option 4A also lies adjacent to the railway, offering the potential for rail-based AIL delivery — a recognised method used for transporting large transformers and heavy electrical equipment. This would significantly reduce road impacts. Option 4B has no rail access. The SSA does not acknowledge or assess this difference, contrary to EN-5 requirements to consider access and opportunities to minimise new infrastructure. The Applicant has therefore failed to demonstrate that Option 4B is environmentally preferable, technically superior or policy-compliant. The rejection of Option 4A is not supported by a lawful, proportionate or environmentally robust alternatives appraisal.	greater opportunities of screening from existing vegetation to the north to reduce the visibility from Great Moulton and provide a greater offset from Narrowgate Way PRow, and where the existing boundary vegetation in the north western part of Sub-Site 1B would provide a level of screening from residential dwellings associated with Great Moulton. With regard to Abnormal Indivisible Load (AIL) delivery, both Options 4A and 4B fall within the same broad location south of Great Moulton, which was concluded to present a viable route, with minimal physical, social, or environmental constraints, and with the appropriate highway visibility and potential to accommodate AIL. Both options are accessed from the A140/B1134 Station Road corridor, and access to Option 4B would be from internal access via the BESS site from the A140 / B1134 roundabout, westbound on the B1134 Station Road, and northbound on Lodge Road and Frith Way. Given the proximity of both options to each other, if rail based AIL was a possibility then this would not be a factor in preferring one option over the other. However, there is not a station near this location, so this was not considered. AIL routeing for the National Grid Substation is set out in Section 6.2 of the Outline CTMP [APP-201], which confirms that AIL deliveries for Sub-Site 1B will be routed north or southbound (subject to further route analysis) on A140, westbound on B1134 Station Road,

ID	Theme	Representation	Applicant's Response
			north onto access A02, and that AIL for transformers and cable drums will be delivered by sea to ports at Felixstowe or Kings Lynn. Access A02 is an existing highway access on B1134 Station Road, as set out in Table 3.1 of the Outline CTMP [APP-201] . The AIL delivery strategy is founded on sea and highway delivery in accordance with standard industry practice, and is secured through the detailed CTMP by DCO Requirement.
GMAG-033	Site Selection National Grid Substation	Planning Weight: GMAG submits that the rejection of Option 4A was not based on lawful planning considerations, environmental assessment or technical feasibility, but on the existence of an unrelated private planning application by a separate developer. Option 4A is environmentally preferable, technically superior, less harmful to the village of Great Moulton, and offers materially better access for Abnormal Indivisible Loads, including potential rail-based delivery. The Applicant's failure to assess these advantages, or to compare the environmental effects of Options 4A and 4B as required by Regulation 14, represents a significant deficiency in the alternatives appraisal. Substantial	As stated above, the Applicant's position is that selection of Option 4B over 4A was based on consideration of an appropriate balance of environmental, technical, and operational constraints, as set out in the Site Selection Assessment [APP-215]. The Applicant has conducted a proportionate, evidence-based assessment of reasonable alternatives in compliance with Regulation 14 of the EIA Regulations. The alternatives considered by the Applicant are described in ES Volume 1, Chapter 5, Reasonable Alternatives and Design [APP-041].

ID	Theme	Representation	Applicant's Response
		negative weight should therefore be attached to the Applicant's justification for selecting Option 4B.	
GMAG-034	Site Selection	4.7. Conclusions Planning Weight The escalation of the project substation from 132kV to 400kV, together with the applicant's subsequent decision to relocate the 400kV National Grid substation from Site 1A to Site 1B, fundamentally altered the scale, configuration and siting considerations of the scheme. Despite these material changes, the applicant did not revisit or strengthen its alternatives appraisal as required under Regulation 14 and expected by NPS EN-1 and EN-5. The evidence demonstrates that the selection of Sub-Site 1B (Option 4B) was shaped by land availability, landowner willingness and the existence of an unrelated private planning application, rather than by a transparent, criteria-led assessment of environmental and technical suitability. The rejection of Option 4A — a location that is less harmful to the village of Great Moulton, adjacent to existing large-scale infrastructure, better suited for AIL	Please refer to the responses above on these matters. The comparative appraisal of Options 4A and 4B in Section 3.5 of the Site Selection Assessment [APP-215] and Section 5.5 of ES Volume 1, Chapter 5 - Reasonable Alternatives and Design [APP-041], together with the assessment of other reasonable alternative National Grid Substation sites in Section 3.6 of the Site Selection Assessment [APP-215], provides a description of the reasonable alternatives studied and the main reasons for the option chosen, taking into account the effects on the environment. Section 5.8 of ES Volume 1, Chapter 5 - Reasonable Alternatives and Design [APP-041] confirms that the Applicant has considered alternatives in line with the requirements of the EIA Regulations and the specific provisions of NPS EN-1, NPS EN-3 and NPS EN-5.

ID	Theme	Representation	Applicant's Response
		access and potentially serviceable by rail — was not based on lawful planning considerations. The Applicant has not shown that the Horlock Rules were applied at the correct stage or with the required rigour, nor that reasonable alternatives were revisited following the redesign of the grid infrastructure. Taken together, these deficiencies demonstrate that the alternatives appraisal cannot be relied upon to justify the siting of a major 400kV grid hub and BESS complex at Great Moulton. Planning Weight: GMAG submits that substantial negative weight must be attached to the Applicant's site selection case. The alternatives appraisal is incomplete, inconsistent and materially flawed. It does not comply with Regulation 14 of the EIA Regulations, does not reflect the requirements of EN-1 or EN-5, and does not provide a lawful or proportionate basis for selecting Sub-Site 1B or for supporting compulsory acquisition. The failure to properly assess Option 4A — an environmentally preferable and technically superior location — further	

ID	Theme	Representation	Applicant's Response
		undermines the credibility of the appraisal. The Applicant has not demonstrated that the chosen site minimises environmental harm, operational risk or community impact, and the alternatives case should therefore carry very limited weight in the overall planning balance.	
GMAG-035	EIA Methodology	5.1. Introduction GMAG submits that the Environmental Statement (ES) is incomplete, outdated and does not meet the requirements of Regulation 14 of the EIA Regulations. The ES does not assess the scheme as currently proposed, does not include essential baseline surveys, and does not provide the Examining Authority with the information required to understand the likely significant effects of the development. As a result, the ES cannot lawfully support a grant of development consent.	The Applicant refers to its responses to GMAG-036 to 050.
GMAG-036	EIA Methodology	5.2 Legal and Policy Requirements for a Lawful ES 5.2.1. EIA Regulations 2017 (Regulation 14)	The application has been validated and accepted by the SoS and the Applicant considers that the requirements of Schedule 4 of the EIA Regulations have been adequately addressed within the ES. Table 1.3 provides cross-reference to the relevant documents

ID	Theme	Representation	Applicant's Response
		Regulation 14 requires the ES to include: • a description of the reasonable alternatives studied • a complete and accurate environmental baseline • an assessment of likely significant effects • a cumulative assessment of the whole project The ES does not meet these requirements.	demonstrating where each of these requirements has been satisfied. The ES [APP-036 to APP-195] and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112].
GMAG-037	EIA Methodology	5.2.2. NPS EN-1 EN-1 requires applicants to: provide a robust evidence base assess all significant environmental effects consider alternatives demonstrate that impacts have been minimised The ES does not demonstrate compliance.	Compliance with NPS EN-1 is set out within the Policy Compliance Statement [APP-210].

ID	Theme	Representation	Applicant's Response
GMAG-038	EIA Methodology	5.2.3. NPS EN-3 and EN-5 EN-3 requires assessment of BESS safety, firewater, drainage, contamination and emergency response. EN-5 requires assessment of substation siting, noise, EMF, landscape, hydrology and cumulative effects. These assessments are incomplete or absent.	Compliance with NPS EN-3 and EN-5 is set out within the Policy Compliance Statement [APP-210] .
GMAG-039	EIA Methodology	5.2.4 Case Law Principle Case law requires an ES to be: • comprehensive • coherent • intelligible • reflective of the actual scheme The ES fails these tests. Additional Case Law • R (Blewett) v Derbyshire CC [2003] — an ES must be comprehensive, coherent and intelligible; if it does not assess the actual development, it is unlawful.	The Applicant considers the ES to be comprehensive, coherent, intelligible, and reflective of the actual Scheme. The ES [APP-036 to APP-195] and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112] .

ID	Theme	Representation	Applicant's Response
		• R (Plan B Earth) v Secretary of State [2020] EWCA Civ 214 — environmental information must be up-to-date and reflect the scheme being consented. • Friends of the Earth v North Yorkshire CC [201c] EWHC 3303 — deferring essential environmental information to post-consent stages is unlawful where it prevents proper assessment.	
GMAG-040	EIA Methodology	5.3. The ES Does Not Reflect the Current Scheme The ES assesses an earlier, materially different version of the project. Since the ES was prepared, the applicant has: • escalated the project substation from 132kV to 400kV • relocated the 400kV National Grid substation from Site 1A to Site 1B • expanded the Great Moulton and Tivetshall St Margaret infrastructure cluster • introduced additional overhead line works	The ES assesses the current Scheme. The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme. ES Volume 1, Chapter 4 – The Scheme [APP-040] details the Scheme parameters considered by the technical authors as part of the EIA to assess realistic worst-case effects for each potential receptor. Topic chapters detail assumptions and limitations where relevant.

ID	Theme	Representation	Applicant's Response
		- increased the scale and footprint of the BESS - altered access routes, drainage and land take These changes fundamentally alter the environmental, hydrological, safety and amenity impacts of the scheme. The ES has not been updated to reflect these changes and therefore does not assess the development now before the Examination.	
GMAG-041	EIA Methodology	5.3.1 No Hydrogeological Risk Assessment GMAG notes that the Environment Agency repeatedly disagreed with the applicant's attempt to scope out water quality, water resources and groundwater impacts, and that the ES still provides no quantified assessment of construction-phase hydrological impacts, thermal emissions from cables, private water supply risks or firewater contamination. These matters remain unresolved and unassessed.	The Applicant Notes this comment. Embedded mitigation measures (flood risk and pollution management) have been included for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Measures to manage fire risk at the BESS is contained within and secured by the Outline BSMP [APP-200]. See the Applicants response to the Environment Agency Relevant Representation (RR-0587) at EA-030.
GMAG-042	EIA Methodology	5.3.2 Unresolved Deficiencies in ES Chapter 6 (Water Environment)	The Applicant Notes this comment.

ID	Theme	Representation	Applicant's Response
		GMAG has reviewed ES Chapter 9 (Water Environment) and notes that several key concerns raised by the Environment Agency remain unresolved. ES Chapter 9 confirms that final cable routes, haul road alignments and watercourse crossing designs remain undetermined, meaning that the ES cannot assess the hydrological effects of the development as proposed. The ES also provides no quantified assessment of construction-phase hydrological impacts, no modelling of sediment mobilisation, no assessment of thermal emissions from buried HV cables, no quantified assessment of risks to private water supplies, and no modelling of firewater contamination pathways. These matters remain unassessed and reinforce the deficiencies identified in Section 5.3 above.	Notwithstanding that details within the Scheme design are to be finalised, commitment has been made to include embedded mitigation measures (flood risk and pollution management) for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Measures to manage fire risk at the BESS is contained within and secured by the Outline BSMP [APP-200]. The Applicant is in on-going dialogue with the Environment Agency to agree a Statement of Common Ground (SoCG). For response to the comment in relation to assessment of thermal emissions from buried HV cables, see Applicants response to the Environment Agency Relevant Representation (RR-0587) at EA-030.
GMAG-043	EIA Methodology	5.4. Failure to Update the ES Following Major Scheme Changes 5.4.1. Escalation of the Project Substation and Relocation of the 400kV National Grid Substation	The ES assesses the current Scheme. The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme, which is also informed by Design Principles, Parameters and Commitments [PP-213] (which clearly sets out the maximum area and height parameters for the 400kV substations). The validation of

ID	Theme	Representation	Applicant's Response
		The shift from a 132kV project substation to a full 400kV installation, combined with the relocation of the 400kV National Grid substation from Site 1A to Site 1B, represents a fundamental redesign of the Great Moulton C Tivetshall St Margaret infrastructure cluster. Yet the ES does not reflect: • the scale and height of 400kV equipment • the increased land take • the increased visual, noise and hydrological impacts • the increased safety and contamination risks	the ES is addressed at GMAG-039 and GMAG-040 respectively. ES Volume 1, Chapter 4 – The Scheme [APP-040] details the Scheme parameters considered by the technical authors as part of the EIA to assess realistic worst-case effects for each potential receptor. Topic chapters detail assumptions and limitations where relevant.
GMAG-044	EIA Methodology	5.4.2. Co-location of Multiple Infrastructure Elements The Great Moulton C Tivetshall St Margaret cluster now includes: • the National Grid substation • the project substation • the BESS	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation.

ID	Theme	Representation	Applicant's Response
		- overhead lines and gantries - access roads - drainage infrastructure - Solar Panels The ES does not assess these elements together, despite their combined footprint forming a single industrial complex.	
GMAG-045	EIA Methodology	5.4.3. ES Chapters Written for an Earlier Scheme Several ES chapters clearly pre-date the redesign. They assess a materially different project and cannot be relied upon. An ES that does not assess the actual development is not Regulation-14 compliant.	The ES assesses the current Scheme. The Applicant considers that ES Volume 1, Chapter 4 - The Scheme [APP-040] provides a clear and accurate description of the Scheme. ES Volume 1, Chapter 4 – The Scheme [APP-040] details the Scheme parameters considered by the technical authors as part of the EIA to assess realistic worst-case effects for each potential receptor. Topic chapters detail assumptions and limitations where relevant.
GMAG-046	EIA Methodology	5.5. Policy Weighting and the Proper Application of EN-1 (2023) GMAG submits that the applicant's interpretation of national policy is incomplete and overstated. While NPS EN-1 (2023) confirms a general and strategic need for low-carbon energy infrastructure, it does not remove the requirement for applicants to	The planning balance considering the positive, neutral and negative impacts are set out in the Planning Statement [APP-209]. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy. As set out in the Planning Statement [APP-209], having had regard to all important and relevant matters, the Applicant has concluded that the substantial

ID	Theme	Representation	Applicant's Response
		demonstrate that a specific scheme, in a specific location, is justified, proportionate and environmentally acceptable. EN-1 makes clear that: - the need for energy infrastructure does not override the requirement for robust environmental assessment - alternatives remain relevant where impacts are significant or siting is constrained - decision-makers must consider whether adverse impacts outweigh the benefits of a particular proposal - applicants must provide sufficient, accurate and up-to-date information for a lawful planning balance The applicant's own documentation indicates that the Clean Power 2030 regional capacity ranges are already met by other prioritised schemes. The weight that can be attached to "need" is therefore materially reduced. In such circumstances, the environmental, hydrological, safety and community	benefits of the Scheme clearly outweigh the residual harms that would arise, including the Scheme's contribution to meeting Government targets on Clean Power by 2030 and Net Zero by 2050, together with more localised significant beneficial effects that are anticipated during the construction, operational and decommissioning phases of the Scheme, such as in relation to biodiversity, green infrastructure strategy, employment and training. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1. The Applicant refers to its response to GMAG-007 above, which specifically explains the national policy position for need as set out in NPS EN-1 Paragraphs 3.2.8 - 3.2.10. Further, NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035 (i.e. without the Scheme, the national and regional capacity ranges would not be met). Further, the Applicant notes that the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). It is therefore not the case that

ID	Theme	Representation	Applicant's Response
		harms associated with the East Pye proposal carry greater weight, and the applicant must demonstrate a compelling justification for selecting a highly constrained location. GMAG submits that this has not been done. The policy weighting therefore falls significantly against the grant of development consent.	"regional capacity ranges are already met by other prioritised schemes."
GMAG-047	EIA Methodology	5.6. Missing and Outdated Baseline Surveys (Regulation 14 Non-Compliance) GMAG has identified multiple missing, incomplete or outdated baseline surveys that prevent the ES from meeting the requirements of Regulation 14. Without these surveys, the Examining Authority cannot understand the likely significant effects of the development. Private water supplies – not undertaken – known receptors; high groundwater vulnerability; contamination pathways from BESS firewater and transformer oil.	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]). Regarding the interrelationships between environmental effects, ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects from other environmental topics. Section 19.2 details the methodology utilised for the in-combination effects assessment. The cumulative effects assessment is discussed at GMAG-048. The outline surface water drainage strategy outlined within Section 9 of ES Volume 3, Appendix 9.1 – FRA and Outline Surface Water Drainage Strategy [AS-

ID	Theme	Representation	Applicant's Response
		- Groundwater modelling – absent – no assessment of infiltration, plume migration, PFAS, or spill scenarios. - Updated hydrology surveys – incomplete – scheme redesign affects drainage, run-off, infiltration and flood pathways. - Updated ecology surveys – outdated – earlier surveys do not reflect the expanded infrastructure cluster. - Noise modelling for 400kV substations – missing – new equipment and switchgear not assessed. - Lighting assessment – not provided – 400kV substations require significant operational lighting - Landscape and visual assessment – outdated – does not include full 400kV installation or cluster. - Cumulative effects assessment – not undertaken – Great Moulton, Tivetshall and Wacton Cluster not assessed as a single entity. - BESS firewater and PFAS risk assessment – absent – no modelling	018] has been designed based on relevant guidance on surface water drainage standards and climate change allowances and utilising the most up to date rainfall methods (Flood Estimation Handbook (FEH22)). Detailed surface water drainage design is secured through DCO Requirement 11. With reference to outdated survey for landscape, the 'existing baseline' year for the LVIA is 2025. The Order Limits and surrounding area were visited in January / February 2025, June / July 2025, and November 2025 to undertake the landscape and visual survey. Detail of landscape methodology is presented in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. The effects on landscape and visual receptors considers the Application and Scheme parameters including the 400kV Substation and other infrastructure at Site 1 as assessed in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Lighting is addressed above and below in response to the GMAG's relevant representation. The ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource (including Private Water Supplies). The assessment has been undertaken in accordance with the methodology

ID	Theme	Representation	Applicant's Response
		of firewater volumes, pathways or receptors. Transformer oil spill modelling – missing – no assessment of containment failure or groundwater contamination These omissions are not minor technical gaps. They go to the heart of whether the scheme is environmentally acceptable, safe, deliverable and legally compliant. Without these baseline surveys, the ES cannot be relied upon.	agreed following scoping and on the basis of the available information, as provided by the Environment Agency, British Geological Survey and South Norfolk Council. The assessment uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. Ecology survey methodologies have been agreed through scoping and consultation processes with relevant statutory consultees. The data obtained from the agreed surveys is therefore considered sufficient to robustly inform the ecological baseline against which the Scheme has been assessed. The results and detailed methodology of specific ecological surveys is presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160]. With the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to water receptors (including private water supplies) can be suitably managed and effects are therefore assessed as 'Not Significant'. The environmental sound survey was undertaken between November 2024 and February 2025, and summarised in ES Volume 3, Appendix 12.1 - Baseline Sound Survey Report [APP-178]. The

ID	Theme	Representation	Applicant's Response
			assessment of operational noise from 400 kV substations is presented within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] . The main noise sources associated with the 400 kV substations are the transformers. Switchgear is quiet during operation and does not form a significant noise source on the Proposed Scheme.
GMAG-048	Cumulative impact EIA Methodology	5.7 Cumulative Effects of the Great Moulton, Tivetshall St Margaret and Wacton Infrastructure Cluster The ES does not assess the cumulative effects of the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster, despite this being the most intensive, risk-bearing and environmentally sensitive part of the scheme. The cluster includes: • the National Grid 400kV substation • the project substation • the BESS compound • overhead lines and gantries • access routes and construction compounds.	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. Regarding the interrelationships between environmental effects, ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects from other environmental topics. Section 19.2 details the methodology utilised for the in-combination effects assessment.

ID	Theme	Representation	Applicant's Response
		- lighting, fencing and operational equipment - Solar Panels These elements are not independent. Their combined footprint forms a large industrial complex in a rural landscape. The ES does not model: - combined noise - combined lighting - combined landscape and visual effects - combined hydrological and contamination pathways - combined construction traffic - combined operational risks (including BESS firewater and transformer oil) - combined effects on groundwater and private water supplies The cumulative effects are likely to be far greater than the sum of their parts. The absence of a cumulative assessment is a fundamental flaw.	

ID	Theme	Representation	Applicant's Response
GMAG-049	EIA Methodology	5.8. Consequences of an Inadequate ES Because the ES does not assess the actual scheme, lacks essential baseline surveys, and omits cumulative effects, the Examining Authority cannot lawfully determine the application. The ES fails to meet the minimum requirements of Regulation 14 and cannot be relied upon in the planning balance.	As identified in GMAG-004 and GMAG-009, the ES does assess the scheme, has undertaken all the requisite baseline surveys and assesses the cumulative effects of the scheme. The Applicant considers that the ES meets the requirements of Regulation 14, and can therefore be relied upon in the planning balance.
GMAG-050	EIA Methodology	5.9. Policy Non-Compliance The ES does not comply with: • NPS EN-1 (environmental assessment, cumulative effects, human health) • NPS EN-3 (solar and BESS cumulative effects) • NPS EN-5 (substation and overhead line impacts) • EIA Regulations (Regulation 14: adequacy of environmental information) • NPPF (assessment of environmental and community impacts)	Compliance with NPS EN-1, EN-3, and EN-5, as well as the NPPF is set out within the Policy Compliance Document [APP-210] . As identified in GMAG-004, GMAG-009 and GMAG-049, the ES is fully compliant with the regulation 14 requirements.

ID	Theme	Representation	Applicant's Response
		The applicant has not demonstrated that impacts have been assessed, avoided or mitigated. 5.10 Conclusions and Planning Weight GMAG submits that the ES is incomplete, outdated and legally inadequate. It does not assess the scheme as proposed, does not include essential baseline surveys, and does not assess cumulative effects. As a result, the ES cannot lawfully support a grant of development consent. Substantial negative weight must be attached to the inadequacy of the ES and the applicant's failure to provide the information required by Regulation 14.	
GMAG-051	Water Environment	Water Environment and Hydrology 6.0. Major Issues GMAG identifies two overarching water-security issues that fundamentally undermine the environmental acceptability and deliverability of the East Pye scheme. These issues arise before, and in addition to, the technical hydrology concerns set out in Chapter 6. They relate to (1) the protection of the	The Applicant notes this comment in relation to protection of the Principal Aquifer, which has been considered through the inclusion of an impermeable membrane for the BESS, National and Project Substation surface water drainage systems as secured within the Design Principles, Parameters and Commitments [APP-213]. Additionally, an options appraisal for water supply for the scheme was completed within ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164]. This resulted in new groundwater or surface water

ID	Theme	Representation	Applicant's Response
		Principal Aquifer and (2) the basic availability of water required to construct and operate the scheme. Both issues represent major omissions in the Environmental Statement and must be addressed before the Application can be considered complete.	abstraction options have been scoped out due to the water scarcity in the region, with tankering identified as the preferred method of supply for potable water. The Applicant notes AWS's current position on new unplanned non-domestic water requests. This in in place by Anglian Water to protect domestic water supplies. The Applicant 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. This approach is being undertaken in order to not impact the local private water supplies.
GMAG-052	Water Environment	Major Issue 1 – Water Security s Loss of Recharge to the Principal Aquifer GMAG submits that the East Pye scheme poses an unacceptable and unassessed risk to the Principal Aquifer that supplies existing homes, farms and businesses in the Great Moulton–Long Stratton area. The site lies directly within a critical recharge zone for the Chalk aquifer, which the Environment Agency already classifies as seriously water-stressed. This aquifer is the primary drinking-water source for the local Water	The applicant notes the concerns raised regarding the loss of recharge to the principal aquifer. An options appraisal for water supply for the scheme was completed within ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164]. This resulted in new groundwater or surface water abstraction options have been scoped out due to the water scarcity in the region, with tankering identified as the preferred method of supply for potable water. The Applicant notes AWS's current position on new unplanned non-domestic water requests. This in in place by Anglian Water to protect domestic water supplies. The Applicant welcomes

ID	Theme	Representation	Applicant's Response
		Resource Zone, and its long-term resilience depends on maintaining natural infiltration and recharge. The Applicant proposes to cover substantial areas of this recharge zone with concrete foundations, hardstanding, access roads, substations and a large BESS compound, yet has provided: • no groundwater model, • no recharge assessment, • no contaminant fate and transport modelling, • no assessment of private water supplies, and • no evaluation of the consequences for existing abstractions. The Application identifies no alternative water source capable of meeting current demand, let alone the significant planned housing and commercial growth in South Norfolk. No evidence has been presented to demonstrate:	continued engagement with Anglian Water throughout the Examination process. The Applicant will also explore tankering options outside the AWS region to meet Scheme demand. This approach is being undertaken in order to not impact the local private water supplies. In regard to recharge, rainwater harvesting is proposed but this is on a very small area, with an average of 40-60 m³/d being able to be captured in the winter. 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. It is not expected that this would impact the local recharge of the aquifer. Therefore a groundwater model was not required for the supply assessment. As described in the ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184], sources of Potential Contamination have not been identified within the Order Limits in sub-Sites 1A to 1D and the BESS Site. Accordingly, fate and transport modelling cannot be undertaken. The Outline CEMP [APP-196] includes ground investigation as a mitigation measure, with the detailed

ID	Theme	Representation	Applicant's Response
		- how the loss of natural infiltration will be offset, - how the aquifer will continue to sustain existing lawful abstractions, or - how water security for local communities will be maintained. The omission of a full Hydrogeological Risk Assessment (HRA) is a fundamental flaw. Without quantifying the reduction in recharge, the impact on groundwater levels, or the consequences for public and private supplies, the Examining Authority cannot be satisfied that the Scheme is compatible with: - long-term water security, - the Water Resources Management Plan, - the Environment Agency's protection policies for Principal Aquifers, or - the requirements of EN-1 and EN-3 regarding safeguarding critical natural resources.	design of the Scheme to be informed by the results of the ground investigation. The results of the ground investigation will be presented in an interpretative Tier 2 Generic Quantitative Risk Assessment (GQRA). If / where the GQRA identifies potential hazards within this area, then further work (including the use of fate and transport models) may be undertaken as part of a Detailed Quantitative Risk Assessment. 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 (secured by DCO Requirement 13). As described in ES Volume 1, Chapter 16 Ground Conditions [APP-052] "As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent". The ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource (including private water supplies). The assessment has been undertaken in accordance with the methodology

ID	Theme	Representation	Applicant's Response
		This issue goes to the heart of the Scheme's environmental acceptability. Until a complete, model-based hydrogeological assessment is provided, the Application cannot be considered complete or capable of meaningful examination. Substantial negative weight must therefore be attached to the Applicant's case.	agreed following scoping and uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The groundwater abstractions identified (including private water supplies) within the Study Area are presented in tables 3.10 and 3.11 of the Phase 1 Ground Conditions Assessment [APP-184] .
GMAG-053	Water Environment	Major Issue 2 – Lack of Water Availability, Drought Resilience and Unlawful Reliance on Tankered Water GMAG submits that the Applicant has failed to demonstrate that sufficient water is available to construct, operate or maintain the East Pye scheme in a region formally designated by the Environment Agency (EA) as seriously water-stressed. The EA's Scoping Opinion (WR1–WR5), reproduced in ES Chapter 9, explicitly warns that there is a risk of lack of availability of water for activities of the Scheme, including dust suppression, welfare facilities, concrete works, washdown, and other construction-phase demands. Despite this, the Environmental Statement (ES) does not assess water-shortage	The Applicant notes the concerns raised about the drought resilience. Within, ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164], new groundwater or surface water abstraction options have been scoped out due to the water scarcity in the region, with tankering identified as the preferred method of supply for potable water. The EA and Anglian Water have also commented on the application. The EA has confirmed that they are satisfied with the option appraisal. Anglian Water also have a strategy for the provision of water for third party users above 20,000 m³/d which requires an application. This further protects the local water supply of public and private water. The Applicant 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
		months, drought periods, seasonal supply deficits, or the routine summer restrictions experienced within this Water Resource Zone. The Water Resources Assessment (WRA), contained within ES: Appendix S.3 Water Resources Assessment [EN0110014/APP/c.3.9.3], relies heavily on a rainwater-harvesting strategy that is not credible, not site-specific, and not environmentally sustainable. The WRA uses rainfall data from Poringland (TG2833000G50) and Fornsett End (TM14383G2G57)—locations several miles from the Order Limits—to generate an average rainfall figure for the Site. This approach masks the reality of drought years, seasonal deficits, and climate-driven summer drying. The Applicant then extrapolates these averaged figures to claim that 27–61 m³/day of rainwater will be available, rising to 135 m³/day in winter, and recommends that winter rainfall be “captured and stored” for use in spring and summer. No assessment is provided of the storage volume required,	This approach is being undertaken in order to not impact the local private water supplies. In regard to the impact of drought conditions, the applicant notes that this has been omitted from ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164] and this will be updated in the chapter at a later deadline to rectify this. The applicant confirms that tankering would be used as an alternative source of non-potable supply in the event that there is shortage of rainfall to cover the demand. With regards to recharge, rainfall harvesting is proposed but this is on a very small area, with an average of 40–60 m³/d being able to be captured in the winter outlined in ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164]. It is not expected that this would impact the local recharge of the aquifer.

ID	Theme	Representation	Applicant's Response
		the infrastructure needed, evaporation losses, water-quality degradation, or the impact of diverting rainfall away from natural infiltration into the Principal Aquifer.	
GMAG-054	Water Environment	The WRA further proposes that contaminated surface water could be treated using a "silt booster unit" and used as a construction water source, without assessing the risks from sediment, hydrocarbons, agricultural chemicals, PFAS, or other pollutants. The Applicant also identifies tankering as a fallback option, despite having no confirmed supplier, no identified abstraction source, no licence, and no assessment of the environmental impacts of exporting water from another stressed catchment. This strategy is presented as viable even though tankering would be required precisely during the driest months, when water availability is lowest across the region. The reliance on off-site rainfall harvesting and tankered imports represents a net loss of recharge to whichever catchment the water is taken from, directly conflicting with the Water	A Water resources assessment carried out within ES Volume 3, Appendix 9.3 - Water Resources Assessment [APP-164] has assessed the various sources of water supply were assessed. Due to the water scarcity in the region, new groundwater or surface water abstraction options were scoped out. This resulted in tankering and storage being the viable option for the scheme for potable water and rainwater harvesting and on-site storage have been identified as preferred option for supply of non-potable water. Due to there being numerous tankering companies, tankering is a secure source of supply. With regards to recharge, rainwater harvesting is proposed but this is on a very small area, with an average of 40-60 m³/d being able to be captured in the winter. It is not expected that this would impact the local recharge of the local catchment and aquifer.

ID	Theme	Representation	Applicant's Response
		Framework Directive requirement to prevent deterioration of groundwater bodies. The ES does not assess the hydrological consequences of removing rainfall from other locations, nor does it evaluate the cumulative effects of exporting water between stressed catchments. The Applicant has therefore failed to demonstrate a lawful, reliable or environmentally acceptable water supply for the Scheme.	
GMAG-055	Water Environment	The absence of a drought-resilient water-availability assessment represents a fundamental omission under Regulation 14 of the EIA Regulations. Without a quantified assessment of water availability during shortage periods, the Examining Authority cannot be satisfied that the Scheme is compatible with: - the Water Resources Management Plan, - the EA's classification of the region as seriously water-stressed, - the protection of existing lawful water users,	The Applicant notes the concerns raised about the drought resilience. Within, ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164], new groundwater or surface water abstraction options have been scoped out due to the water scarcity in the region, with tankering identified as the preferred method of supply for potable water. The EA and Anglian Water have also commented on the application. The EA has confirmed that they are satisfied with the option appraisal. Anglian Water also have a strategy for the provision of water for third party users above 20,000 m³/d which requires an application. This further protects the local water supply of public and private water.

ID	Theme	Representation	Applicant's Response
		- sustainable water-resource management under EN-1, and - the Applicant's own stated construction methodology. GMAG submits that the Applicant has not identified a lawful, reliable or environmentally acceptable water source for the Scheme. Substantial negative weight must therefore be attached to the Applicant's water-resource case, and the Application cannot be considered complete until a full, drought-resilient water-availability assessment is provided.	The Applicant notes AWS's current position on new unplanned non-domestic water requests. This is in place by Anglian Water to protect domestic water supplies. The Applicant welcomes continued engagement with the EA and Anglian Water throughout the Examination process. The Applicant will also explore tankering options outside the AWS region to meet Scheme demand. This approach is being undertaken in order to not impact the local private water supplies. The applicant confirms that a source of tankered water supply will be identified and resolved prior to commencement of the Scheme and that the proposed rainwater harvesting will be on-site and therefore cover a very small area. In regard to the impact of drought conditions, the applicant notes that this has been omitted from ES Volume 3, Appendix 9.3 – Water Resources Assessment [APP-164] and this will be updated in the chapter at a later deadline to rectify this. The applicant confirms that tankering would be used as an alternative source of non-potable supply in the event that there is shortage of rainfall to cover the demand.

ID	Theme	Representation	Applicant's Response
GMAG-056	Water Environment	Major Issue 3 – Inconsistency Between the Flood Risk Assessment and the Water Resources Assessment The Flood Risk Assessment and Outline Surface Water Drainage Strategy (Appendix 9.1) makes no reference to rainwater harvesting, storage, reuse or rainfall diversion, despite the Water Resources Assessment (Appendix 9.3) relying on rainwater harvesting as a primary water source for the Scheme. The FRA instead assumes that rainfall will infiltrate to ground or be discharged to watercourses via permeable surfaces, filter drains and controlled outfalls. No storage infrastructure, treatment systems, hydrological modelling or flood-risk assessment has been provided for the large-scale rainfall capture and winter storage system described in Appendix 9.3. This inconsistency demonstrates that rainwater harvesting is not part of the engineered design, has not been assessed for flood risk or groundwater impacts, and is therefore not a credible or deliverable water-supply solution. The	ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] does reference rainwater harvesting/re-use in Section 9.4 that it will be considered further at detailed design, which is secured through DCO Requirement 11.

ID	Theme	Representation	Applicant's Response
		omission represents a fundamental failure under Regulation 14 of the EIA Regulations and further undermines the Applicant's water-resource case. Substantial negative weight must therefore be attached to the Applicant's hydrological and water-resource assessments.	
GMAG-057	Water Environment	6.1 Introduction and Summary of Concerns GMAG has fundamental concerns about the hydrological and hydrogeological suitability of the Great Moulton location. The site lies on a highly vulnerable Chalk aquifer, contains an intermittent winterbourne, straddles a dual-catchment hydrological divide, and is surrounded by private water supplies that have not been identified, surveyed or assessed. The British Geological Survey (BGS) and Environment Agency (EA) baseline studies confirm that groundwater resources in East Anglia are already under pressure and that the Chalk and Crag aquifers exhibit long residence times, limited natural attenuation and high sensitivity to anthropogenic contamination.	The Applicant notes this comment. Private water supplies have been identified and assessed within ES Volume 1, Chapters 9 – Water Environment and 16 – Ground Conditions. As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] (with detailed design secured through DCO Requirement 11), the BESS and Substations will have surface water drainage systems which will be lined with an impermeable membrane to prevent runoff from these areas from percolating through to the strata beneath. The solar panels within fields and standalone inverter/converter units have a low pollution risk. The solar panels will be PFAS free and will be cleaned with distilled water as set out in and secured by the Design

ID	Theme	Representation	Applicant's Response
		The applicant has not provided a lawful or robust assessment of the water environment. Key baseline information is missing, no infiltration or groundwater testing has been undertaken, and no modelling has been provided for contaminant transport, winterbourne behaviour, dual-catchment pathways or the cumulative effects of the concentrated infrastructure cluster. The Environmental Statement (ES) does not meet the requirements of: - the EIA Regulations 2017, - NPS EN-1, - NPS EN-3, - NPS EN-5, or - the Water Framework Directive (WFD). The risks to groundwater, surface water, private water supplies and human health have not been assessed. GMAG submits that the site is hydrologically unsuitable for a permanent 400kV substation, BESS compound and associated infrastructure, and that	Principles, Parameters and Commitments [APP-213]. As such, the infrastructure proposed for the Scheme poses no significant pollution risk to the sensitive water receptors in the area. Where trenchless cable crossings interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196]. As described in the ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184], Sources of Potential Contamination have not been identified within the Order Limits in sub-Sites 1A to 1D and the BESS Site. Accordingly, fate and transport modelling cannot be undertaken. 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 results of the ground investigation will be presented in an interpretative Tier 2 Generic Quantitative Risk Assessment (GQRA). If / where the GQRA identifies potential hazards within this area, then further work (including the use of fate and transport models) may be undertaken as part of a Detailed Quantitative Risk Assessment.

ID	Theme	Representation	Applicant's Response
		substantial negative weight must be attached to the applicant's case.	The Outline CEMP [APP-196] requires that Foundation Works Risk Assessment (FWRA) is undertaken 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 (secured by DCO Requirement 13). As described in ES Volume 1, Chapter 16 - Ground Conditions [APP-052] "As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent". The ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource (including private water supplies). The assessment has been undertaken in accordance with the methodology agreed following scoping and uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The groundwater abstractions identified (including private water supplies) within the Study Area are presented in tables 3.10 and 3.11 of ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184].

ID	Theme	Representation	Applicant's Response
			ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] is based on information available at the time of the Application of the Scheme, and will be kept under review in line with new information and assessments which become available as part of the future ongoing design process for the Scheme, where this information may have relevance to WFD requirements and objectives. The ES has been prepared in alignment with all relevant national and local policy.
GMAG-058	Water Environment	6.2 Baseline Hydrology and Hydrogeology 6.2.1 Chalk Aquifer Vulnerability The Great Moulton site lies on permeable Upper Cretaceous Chalk, one of the most important and most sensitive aquifers in England. The BGS/EA Baseline Report for the region confirms that Chalk groundwater chemistry is controlled by slow water–rock interactions, long residence times and limited natural attenuation. Once contaminated, Chalk aquifers can take decades or centuries to recover, and in many cases, contamination is effectively irreversible.	As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] (with detailed design secured through DCO Requirement 11), the BESS and Substations will have surface water drainage systems which will be lined with an impermeable membrane to prevent runoff from these areas from percolating through to the strata beneath. The solar panels within fields and standalone inverter/converter units have a low pollution risk. The solar panels will be PFAS free and will be cleaned with distilled water as set out in and secured by the Design Principles, Parameters and Commitments [APP-213]. It should also be noted that the conversion of fields from agricultural use to solar farm use will result in the cessation of fertiliser and chemical applications, which

ID	Theme	Representation	Applicant's Response
		Key characteristics relevant to this site include: • rapid infiltration through permeable superficial deposits • high permeability via fissures, fractures and solution features • direct connectivity between surface water and groundwater • limited capacity for dilution or natural remediation The BGS notes that groundwater resources in East Anglia are already under pressure and that anthropogenic pollutants, particularly nitrates, show the greatest deviation from natural baseline conditions. This demonstrates that the aquifer is already stressed and highly vulnerable to further disturbance. BGS borehole records in the surrounding area indicate shallow groundwater levels, historic abstraction points and water-bearing Chalk close to the surface. The ES does not assess these vulnerabilities and provides no hydrogeological risk assessment,	is assessed as a Major Significant Beneficial impact within ES Volume 1, Chapter 9 – Water Environment [APP-045]. As such, the infrastructure proposed for the Scheme poses no significant pollution risk to the sensitive water receptors in the area.

ID	Theme	Representation	Applicant's Response
		contrary to EN-1 and the EIA Regulations. Planning Weight: The failure to assess Chalk aquifer vulnerability is a critical omission. Substantial negative weight must be attached to the applicant's hydrological case.	
GMAG-059	Water Environment	6.2.2. Intermittent Surface Water Feature and Groundwater–Surface Water Interaction Topographic and field evidence indicates the presence of an intermittent surface water feature within the site boundary. This feature occupies a natural drainage depression and shows characteristics consistent with groundwater-fed ephemeral flow, including seasonal wetness, rapid response to rainfall and alignment with shallow groundwater levels recorded in nearby BGS boreholes. Whether classified as a winterbourne, seepage line or ephemeral channel, its presence demonstrates direct surface–groundwater interaction and a potential pathway for contaminant mobilisation.	The Applicant notes this comment. Surface and groundwater receptors have been identified and assessed within ES Volume 1, Chapter 9 – Water Environment [APP-045]. Flood risk has been assessed within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] using hydraulic model information from the Environment Agency (EA) and surface water flood risk mapping. The EA has confirmed in a meeting in December 2025 that they are content with the approach taken to assessing flood risk and further hydrological/hydraulic modelling is not required. The assessment considers the embedded mitigation measures as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] and therefore the residual effect is assessed as 'Not Significant' for water and

ID	Theme	Representation	Applicant's Response
		Intermittent groundwater-fed features are recognised in the BGS/EA Baseline Report as important components of East Anglia's hydrology, contributing to rapid recharge and supporting sensitive ecosystems. Such features can act as efficient transport pathways during high-flow or recharge events, mobilising pollutants from hardstanding, construction areas or accidental spills. The applicant has not modelled: • intermittent flow behaviour • pollutant mobilisation during recharge events • flood pathways across the site • downstream receptor impacts • interactions between shallow groundwater and surface water features Given the presence of an intermittent groundwater-linked drainage feature, the absence of hydrological modelling is a major omission. Planning Weight:	groundwater receptors in relation to impacts on water quality and also groundwater recharge. The likely effect from the cessation of agricultural use/chemicals/fertilisers is assessed as Significant Major Beneficial.

ID	Theme	Representation	Applicant's Response
		The failure to assess intermittent surface water behaviour and associated pollutant pathways is a serious deficiency. Substantial negative weight must be attached to the applicant's case.	
GMAG-060	Water Environment	6.2.3. Dual-Catchment Hydrology The site straddles a hydrological divide, with western flows draining towards the River Tas and eastern flows draining towards the River Waveney. This dual-catchment configuration significantly increases hydrological risk, as contamination could affect two separate river systems, both of which are subject to Water Framework Directive (WFD) obligations. The Tas is a Chalk stream — a globally rare habitat type requiring the highest level of protection. The Waveney supports sensitive wetland systems and groundwater-dependent ecosystems. The BGS/EA baseline report highlights the importance of groundwater contributions to surface water flows in this region. The applicant has not undertaken:	Water Framework Directive (WFD) obligations are based on individual WFD waterbody catchment areas, and the River Tas, River Waveney and their connecting watercourses are sub-divided into multiple WFD waterbody catchments. All relevant WFD catchments which may be impacted by the Scheme have been screened, relevant receptors have been identified and where necessary, further assessment of WFD compliance has been undertaken within ES Volume 3, Appendix 9.2 - Water Framework Directive Assessment [APP-163].

ID	Theme	Representation	Applicant's Response
		• a dual-catchment assessment • receptor identification for either catchment • modelling of contaminant pathways • WFD compliance assessment This omission is contrary to EN-1, EN-5 and the WFD. Planning Weight: The absence of a dual-catchment assessment is a major hydrological failure. Substantial negative weight must be attached to the applicant's case.	
GMAG-061	Water Environment	6.2.4 Private Water Supplies There are multiple private wells and boreholes in the vicinity of the site. The BGS/EA baseline report confirms that East Anglia contains hundreds of private water supplies, many of which rely on shallow Crag or Chalk aquifers. These supplies are highly vulnerable to contamination due to rapid infiltration and limited natural attenuation. The applicant has: • not identified private water supplies	The ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource (including Private Water Supplies). The assessment has been undertaken in accordance with the methodology agreed following scoping and on the basis of the available information, as provided by the Environment Agency, British Geological Survey and South Norfolk Council. The assessment uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations.

ID	Theme	Representation	Applicant's Response
		- not surveyed them - not assessed their vulnerability - not modelled contamination pathways - not proposed mitigation This is contrary to EN-1, UKHSA guidance and standard EIA practice. Without identifying receptors, no risk assessment is possible; without a risk assessment, no mitigation is possible; and without mitigation, the ES cannot be lawful. Planning Weight: The absence of a private water supply survey is a critical failure. Substantial negative weight must be attached to the applicant's case.	With the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to water receptors (including private water supplies) can be suitably managed and effects are therefore assessed as 'Not Significant'.
GMAG-062	Water Environment	6.2.5. BGS Borehole Data BGS borehole records in the surrounding area show: - shallow groundwater levels - permeable superficial deposits	The ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] presents geological and hydrogeological data, informed by published and publicly available data sources. Section 3.2 presents the geological baseline, and recognises the presence of the glaciofluvial permeable superficial deposits.

ID	Theme	Representation	Applicant's Response
		• water-bearing Chalk close to the surface • historic abstraction points • potential karstic features and solution pathways These characteristics significantly increase the risk of rapid contaminant transport. The ES does not reference or analyse this data, despite its relevance to groundwater vulnerability, construction impacts and long-term operational risk. Planning Weight: The failure to incorporate BGS borehole data renders the hydrogeological baseline incomplete. Substantial negative weight must be attached to the applicant's case.	As described in Section 3.2, the review of the relevant historical borehole information has shown that the chalk is located, at shallowest, approximately 12.5m, below the maximum depth of piled foundations – noting that the Outline CEMP [APP-196] requires that Foundation Works Risk Assessment (FWRA) is undertaken 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. Hydrogeological baseline information is provided in Section 3.4, including a review of groundwater abstractions (including private water supplies) and associated groundwater levels. The ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource (including Private Water Supplies). The assessment has been undertaken in accordance with the methodology agreed following scoping and on the basis of the available information, as provided by the Environment Agency, British Geological Survey and South Norfolk Council, and is also informed by the geological baseline as evidenced on the published geological mapping. The assessment uses a 250m Study Area for low ground disturbance works such as construction of PV arrays,

ID	Theme	Representation	Applicant's Response
			and a 1km Study Area around structures that may require deeper piled foundations. The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. The Outline CEMP [APP-196] includes commitments (secured by DCO Requirement 13) to undertake ground investigation and states that "<i>The results of the ground investigation will be used to inform the detailed design of the Scheme</i>". This will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). With the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to water receptors (including private water supplies) can be suitably managed and effects are therefore assessed as 'Not Significant' Geological and groundwater level information has been provided through historic boreholes in the vicinity of the Order Limits within ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184-186] which shows that groundwater levels are significantly below ground (greater than 20m).
GMAG-063	Water Environment	6.3. Deficiencies in the Applicant's Baseline Assessment	The Applicant Notes this comment.

ID	Theme	Representation	Applicant's Response
		The applicant's Environmental Statement (ES) does not provide the minimum hydrological or hydrogeological information required under the EIA Regulations, NPS EN-1, EN-3, EN-5 or the Water Framework Directive. The baseline is incomplete, key receptors have not been identified, and no meaningful assessment of groundwater, surface water or contamination risk has been undertaken. The deficiencies listed below are fundamental and render the ES unreliable as a basis for decision-making. GMAG notes that ES Chapter 9 (Water Environment) does not provide a complete or accurate hydrological baseline for the Scheme. Key hydrological parameters remain undefined, including final cable routes, haul road alignments, watercourse crossing designs, trench depths, construction water demand, dewatering requirements and the location and sensitivity of private water supplies. ES Chapter 9 also confirms that several concerns raised by the Environment	Baseline flood risk information is provided within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. Embedded mitigation measures (flood risk and pollution management) have been included for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Measures to manage fire risk at the BESS is contained within and secured by the Outline BSMP [APP-200]. The Applicant will discuss the EA's concerns with them in due course and matters under discussion will be reported in the SoCG between those parties. The risks to surface water and groundwater receptors are assessed within the Phase 1 Ground Conditions Assessment [APP-184]. As shown in the Tier 1 Preliminary Risk Assessment the risks to surface water and groundwater receptors (both in relation to biodiversity and as a resource) from mobilisation of existing contamination in the ground at Sources of Potential Contamination (SPC) 1 to 3 are shown to be Very Low to Low during the Construction and Decommissioning Phases and Very Low during the Operational Phase. Whilst a Moderate risk is identified at SPC 4 (Former Refuse Tip) contamination associated with the fill in the former tip (where present) is potentially present regardless of the construction of the

ID	Theme	Representation	Applicant's Response
		Agency remain unresolved, including groundwater–surface water interactions, thermal emissions from buried HV cables, sediment mobilisation during construction and the risk of contaminated firewater reaching groundwater or surface water receptors. As a result, the hydrological baseline presented in the ES is incomplete and cannot support a reliable assessment of impacts.	Scheme, as the landfill is assumed to not benefit from an engineered liner and therefore to operate on the 'dilute and disperse' principle. The baseline condition is that contamination associated with this PSC could be leaching out into the surrounding water environment. The Scheme avoids any construction in the area of SPC 4 and therefore the baseline is maintained. ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] is based on information available at the time of the Application of the Scheme and will be kept under review in line with new information and assessments which become available as part of the future ongoing design process for the Scheme, where this information may have relevance to WFD requirements and objectives.
GMAG-064	Water Environment	6.3.1 Missing Private Water Supply Survey No private water supply (PWS) survey has been undertaken, despite the known presence of private wells and boreholes in the surrounding area. The BGS/EA Baseline Report confirms that East Anglia contains extensive private abstractions, many of which rely on shallow Crag or Chalk aquifers that are highly vulnerable to contamination.	The ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource (including Private Water Supplies). The assessment has been undertaken in accordance with the methodology agreed following scoping and on the basis of the available information, as provided by the Environment Agency, British Geological Survey and South Norfolk Council. The assessment uses a 250m Study Area for low ground disturbance works such as construction of

ID	Theme	Representation	Applicant's Response
		The applicant has not: - identified PWS locations - surveyed their construction, depth or abstraction rate - assessed their vulnerability - modelled contaminant pathways - proposed mitigation This omission is contrary to EN-1, UKHSA guidance and standard EIA practice. Without identifying receptors, no risk assessment is possible; without a risk assessment, no mitigation is possible; and without mitigation, the ES cannot be lawful. Planning Weight: This is a critical failure. Substantial negative weight must be attached to the applicant's case.	PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. With the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to water receptors (including private water supplies) can be suitably managed and effects are therefore assessed as 'Not Significant'
GMAG-065	Water Environment	6.3.2 No Infiltration Testing No infiltration testing (e.g. BRE365) has been undertaken anywhere within the site. The applicant has not confirmed: groundwater depth	The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. The Outline CEMP [APP-196] includes commitments (secured by DCO Requirement 13) to undertake ground investigation and states that "<i>The results of the ground</i>

ID	Theme	Representation	Applicant's Response
		- infiltration capacity - permeability of superficial deposits - suitability of infiltration-based drainage - risk of rapid contaminant transport Given the Chalk's high permeability and the presence of shallow groundwater, the absence of infiltration testing is a major omission. The drainage strategy is therefore unsupported by evidence and cannot be relied upon. Planning Weight: The lack of infiltration testing renders the drainage and contamination assessments incomplete. Substantial negative weight must be attached to the applicant's case.	<i>investigation will be used to inform the detailed design of the Scheme". This will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA).</i> As described in ES Volume 1, Chapter 16 Ground Conditions [APP-052] "As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent". Geological and groundwater level information has been provided through historic boreholes in the vicinity of the Order Limits within ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184-186]. This shows that the majority of the Order Limits is underlain by significant thickness of Diamicton (also known as 'Boulder Clay') of the Lowestoft Formation, which is predominantly clayey. On this basis, it is conservative to assume that infiltration drainage is unlikely to be feasible across the majority of the Order Limits. The LLFA stated in a meeting on the 18th August 2026 that infiltration testing for detailed design would require a test/borehole at the location of each infrastructure (i.e. standalone converter/inverter unit). The locations of these units are not finalised and therefore undertaking testing at this stage could lead to abortive results.

ID	Theme	Representation	Applicant's Response
			Therefore, given the information within the historic boreholes close to the site and to avoid abortive testing that may not relate to the locations of infrastructure at detailed design, intrusive ground investigations including infiltration testing will be undertaken post-consent to inform the detailed surface water drainage design. The design of the Scheme has not yet been finalised and therefore the surface water drainage strategy is outline in its form but confirms the likely attenuation form and volume requirements. There is commitment for a drainage design to accommodate the 1 in 100 annual probability +45% allowance for climate change rainfall event as secured within the Design Principles, Parameters and Commitments [APP-213]. The surface water drainage design has been prepared in mind of pollution risk to aquifers and as such the surface water drainage systems for the BESS, National Grid and Project Substations will be lined with an impermeable membrane to prevent runoff from infiltrating to the strata beneath as secured within the Design Principles, Parameters and Commitments [APP-213]. Commitment has also been made in this document to the provision of swales and filter drains for access track drainage.
GMAG-066	Water Environment	6.3.3. No Assessment of Intermittent Surface Water Feature	The Applicant Notes this comment.

ID	Theme	Representation	Applicant's Response
		The site contains an intermittent groundwater-linked drainage feature consistent with ephemeral flow behaviour. The applicant has not assessed: • flow characteristics • pollutant mobilisation during recharge events • flood routing • downstream receptor impacts • interactions with shallow groundwater Given the direct surface-groundwater connectivity in Chalk landscapes, this omission is significant and undermines the reliability of the ES. Planning Weight: The failure to assess intermittent surface water pathways is a serious deficiency. Substantial negative weight must be attached to the applicant's case.	The respondent has not made it clear as to where the groundwater-linked drainage feature is located, however further clarification on groundwater table and why assessment has not been undertaken for pollutant mobilisation and flow characteristics is outlined below. Groundwater level information for the area is provided in ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184]. The report shows that there is significant thickness of Diamicton above the Chalk aquifers and groundwater is at significant depth. Therefore, there would no direct interaction between the Scheme and the groundwater table. The majority of the Scheme is solar panels which will be raised on narrow supports at an appropriate freeboard above ground level/anticipated flood depths and the ground cover beneath will be grass/wildflower meadow as secured within the Design Principles, Parameters and Commitments [APP-213]. As such, recharge to ephemeral features where they are present will not be significantly affected. Embedded mitigation measures (flood risk and pollution management) have been included for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Measures to manage fire risk at the BESS is contained within and secured by the oBSMP [APP-200].

ID	Theme	Representation	Applicant's Response
			The Scheme has applied as far as practicable a sequential approach to the location of infrastructure in areas of lowest flood risk and a Sequential Test has been undertaken as set out in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], with a commitment on locating infrastructure, compounds and stockpiles at least 10m away from watercourses as secured within the Design Principles, Parameters and Commitments [APP-213]. The solar panels will be PFAS free and will be cleaned with distilled water as set out and secured within the Outline OEMP [APP-197] in the Design Principles, Parameters and Commitments [APP-213]. As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], the surface water drainage systems for the BESS, National Grid and Project Substations will incorporate a lined impermeable membrane to prevent the infiltration of runoff from these areas to the strata beneath. Detailed surface water drainage design is secured through DCO Requirement 11.
GMAG-067	Water Environment	6.3.4 No Dual-Catchment Assessment	Water Framework Directive (WFD) obligations are based on individual WFD waterbody catchment areas, and the River Tas, River Waveney and their connecting

ID	Theme	Representation	Applicant's Response
		The site straddles a hydrological divide between the Tas and Waveney catchments. The applicant has not: - identified the hydrological divide - assessed dual-catchment flow pathways - modelled contaminant transport to either river system - undertaken a WFD compliance assessment This omission is contrary to EN-1, EN-5 and the WFD. Contamination could legally trigger deterioration in two separate water bodies, yet no assessment has been provided. Planning Weight: The absence of a dual-catchment assessment is a major hydrological failure. Substantial negative weight must be attached to the applicant's case.	watercourses are sub-divided into multiple WFD waterbody catchments. All relevant WFD catchments which may be impacted by the Scheme have been screened and where necessary, further assessed for WFD compliance within the ES Volume 3, Appendix 9.2 Water Framework Directive Assessment [APP-163]. ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] is based on information available at the time of the Application of the Scheme, and will be kept under review in line with new information and assessments which become available as part of the future ongoing design process for the Scheme, where this information may have relevance to WFD requirements and objectives.
GMAG-068	Water Environment	No Hydrogeological Risk Assessment The applicant has not undertaken any hydrogeological risk assessment for	The Applicant Notes this comment. Embedded mitigation measures (flood risk and pollution management) have been included for all phases of the

ID	Theme	Representation	Applicant's Response
		construction or operation. No modelling has been provided for: • BESS firewater • PFAS contamination • transformer oil spills • concrete leachate • fuel and chemical spills • silt mobilisation • trenching and dewatering impacts Given the sensitivity of the Chalk aquifer and the presence of shallow groundwater, this omission is unacceptable and contrary to EN-1, EN-3 and EN-5. Planning Weight: The absence of a hydrogeological risk assessment is a fundamental flaw. Substantial negative weight must be attached to the applicant's case.	Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Measures to manage fire risk at the BESS is contained within and secured by the Outline BSMP [APP-200]. The solar panels will be PFAS free and will be cleaned with distilled water as set out and secured within the Outline OEMP [APP-197] in the Design Principles, Parameters and Commitments [APP-213]. As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], the surface water drainage systems for the BESS, National Grid and Project Substations will incorporate a lined impermeable membrane to prevent the infiltration of runoff from these areas to the strata beneath. Detailed surface water drainage design is secured through DCO Requirement 11. The hydrogeology of the underlying aquifers will be considered as part of post-consent interpretative assessments, such as FWRA, Hydrogeological Risk Assessment and Generic Quantitative Risk Assessments. See GMAG-069 for further information.
GMAG-069	Water Environment	6.4. Pollution and Contamination Risks The applicant has not assessed the contamination risks associated with constructing and operating a 400kV	The Applicant Notes this comment and directs the respondent to the responses to GMAG-068 with regard to the hydrogeological assessment.

ID	Theme	Representation	Applicant's Response
		substation, BESS compound and associated infrastructure on a highly permeable Chalk aquifer with shallow groundwater. The BGS/EA Baseline Report confirms that the Chalk in East Anglia has limited natural attenuation, long residence times and high vulnerability to anthropogenic pollutants. Once contaminants enter the Chalk, they can persist for decades or longer, and remediation is often not feasible. The ES does not provide any hydrogeological risk assessment for the following major contamination pathways.	Groundwater level information for the area is provided in ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184]. The report shows that there is significant thickness of Diamicton above the Chalk aquifers and groundwater is at significant depth (>20m). Therefore, there would no direct interaction between the Scheme and the groundwater table within the chalk aquifer. Embedded mitigation measures (flood risk and pollution management) have been included for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Measures to manage fire water at the BESS is contained within and secured by the oBSMP [APP-200]. The solar panels will be PFAS free and will be cleaned with distilled water as set out and secured within the Outline OEMP [APP-197] in the Design Principles, Parameters and Commitments [APP-213]. As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], the surface water drainage systems for the BESS, National Grid and Project Substations will incorporate a lined impermeable membrane to prevent the infiltration of runoff from these areas to the strata beneath. Detailed surface water drainage design is secured through DCO Requirement 11.

ID	Theme	Representation	Applicant's Response
			The hydrogeology of the underlying aquifers will be considered as part of post-consent interpretative assessments, such as FWRA, Hydrogeological Risk Assessment and Generic Quantitative Risk Assessments. 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 results of the ground investigation will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). However, as described in the ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] sources of existing contamination in the ground that could be mobilised by the construction of the Scheme have not been identified in the area of any of the proposed substations with the exception of the Project Substation in Sub-Site 10C which is located within the extent of the Former RAF Seething identified as Source of Potential Contamination (SPC) 2. The Preliminary Risk Assessment for SPC 2 assesses the risks to groundwater as Very Low during all phases of the Scheme. The Outline CEMP [APP-196] requires the Applicant <u>to undertake FWRA to assess the risks to the Principal Aquifer associated with the construction of the BESS, National Grid Substation and any other structures requiring deep foundations and/or piling such as the</u>

ID	Theme	Representation	Applicant's Response
			132kV and 400kV Substations, informed by the post ground investigation. Where trenchless cable crossings interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196].
GMAG-070	Water Environment	6.4.1. BESS Firewater and Thermal Runaway Thermal runaway in lithium-ion battery systems produces highly toxic firewater containing: • PFAS compounds • heavy metals • acidic and alkaline species • dissolved plastics and organic toxins • carcinogenic combustion by-products Firewater is generated in large volumes and is extremely mobile in permeable soils. On a Chalk aquifer, it would infiltrate rapidly, with minimal attenuation and long-term persistence.	Measures for the management of firewater from batteries is contained within the Outline BSMP [APP-200] and includes the provision of a sealed/lined surface water drainage system with a penstock valve which activates when the fire alarm sounds with an option for manual closing. Firewater would be tested and tankered away.

ID	Theme	Representation	Applicant's Response
		The applicant has not provided: • firewater containment design • impermeable membranes or bunding • emergency drainage plans • firewater volume calculations • contaminant transport modelling • assessment of PFAS persistence in Chalk Given the known risks associated with BESS fires, the absence of a firewater risk assessment is a major omission and contrary to EN-3 and UKHSA expectations. Planning Weight: The failure to assess BESS firewater impacts on a vulnerable Chalk aquifer is a significant deficiency. Substantial negative weight must be attached to the applicant's case.	
GMAG-071	Water Environment	6.4.2. Concrete Leachate and Alkalinity Concrete foundations, cable trenches and substation platforms can release	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational

ID	Theme	Representation	Applicant's Response
		high-pH leachate during curing and weathering. Concrete leachate can mobilise metals, alter groundwater chemistry and damage ecosystems. The BGS/EA Baseline Report highlights the sensitivity of Chalk groundwater chemistry to anthropogenic disturbance. The applicant has not assessed: • pH impacts on groundwater • leachate generation rates • contaminant mobilisation • interactions with shallow groundwater • mitigation measures This omission is contrary to EN-1 and standard hydrogeological practice. Planning Weight: The absence of a concrete leachate assessment undermines the reliability of the ES. Substantial negative weight must be attached to the applicant's case.	phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. Attenuation volume requirements for surface water management from areas of hardstanding (notably the BESS, National Grid and Project Substations) are outlined within Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. The BESS and Substations (Project and National) will have surface water drainage systems that will be lined with an impermeable membrane to prevent runoff discharging uncontrolled to strata beneath. Commitment has also been made in the Design Principles, Parameters and Commitments [APP-213] for the provision of swales and filter drains for access track drainage. Detailed surface water drainage design is secured through DCO Requirement 11. 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 results of the ground investigation will be presented in an interpretative Tier 2 Generic Quantitative Risk Assessment (GQRA).

ID	Theme	Representation	Applicant's Response
			Embedded mitigation measures (flood risk and pollution management) have been included for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Measures to manage fire risk at the BESS is contained within and secured by the oBSMP [APP-200]. With the incorporation of these embedded mitigation measures, cumulative impacts on the water environment are assessed within ES Volume 1, Chapter 9 – Water Environment [APP-045] as Not Significant, with the exception of impacts from the cessation of agricultural use/chemicals which is assessed as a Significant Major Beneficial impact.
GMAG-072	Water Environment	6.4.3. Oils, Fuels and Transformer Fluids A 400kV substation contains significant volumes of: • transformer oil • switchgear fluids • hydraulic oils • lubricants and coolants These substances pose a high contamination risk to Chalk aquifers due	As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], the Substations (Project and National) will have surface water drainage systems that will be lined with an impermeable membrane to prevent runoff discharging uncontrolled to strata beneath. As set out and secured within the Outline OEMP [APP-197], transformers will be bunded/self-contained and <i>"All smaller fixed infrastructure (e.g. transformers) will be self-bunded to prevent any leaks from reaching the watercourse. If pollution is detected it will be suctioned to a self-bunded (or similar) tank and removed from site for suitable disposal"</i> and fuel/other chemicals will be in

ID	Theme	Representation	Applicant's Response
		to rapid infiltration and limited natural attenuation. The ES does not assess: • spill scenarios • bunding adequacy • catastrophic failure events • long-term infiltration pathways • groundwater contamination modelling This is contrary to EN-5 and standard substation design requirements. Planning Weight: The failure to assess transformer oil and fuel spill risks is a major omission. Substantial negative weight must be attached to the applicant's case.	bunded containers or stored within a suitable bunded impermeable area. Any pollution will be contained and removed from site.
GMAG-073	Water Environment	6.4.4. Surface-Water Mobilisation Intermittent groundwater-linked drainage features within the site can rapidly mobilise contaminants during rainfall or recharge events. These pathways are particularly significant in Chalk landscapes, where surface water	The Applicant notes this comment and would re-iterate that with the incorporation of the embedded pollution mitigation measures have been included for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. With the inclusion of this embedded mitigation, the potential impacts to receptors from pollution is considered to be Not Significant.

ID	Theme	Representation	Applicant's Response
		features often connect directly to groundwater. The applicant has not modelled: • contaminant mobilisation • overland flow pathways • interactions with shallow groundwater • downstream receptor impacts This omission is contrary to EN-1 and the EIA Regulations. Planning Weight: The absence of surface water mobilisation modelling is a serious deficiency. Substantial negative weight must be attached to the applicant's case.	Where trenchless cable crossings interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196]. ES Volume 1, Chapter 16 Ground Conditions [APP-052] assesses effects associated with mobilisation of existing contamination in the ground, in accordance with the methodology agreed following scoping. The assessed effects include "<i>Ground disturbance during all phases resulting in existing contamination (if present) in the ground being mobilised. The effect of which is controlled waters receptors (i.e., surface water and groundwater) being exposed to contamination</i>". The effects are: - Construction and Decommissioning Phases Hydrology (surface water): Negligible, Not Significant and Temporary - Construction and Decommissioning Phases Hydrogeology (groundwater): Minor, Not Significant and Temporary - Operational Phase Hydrology (surface water): Negligible, Not Significant and Temporary

ID	Theme	Representation	Applicant's Response
			- Operational Phase Hydrogeology (groundwater): Minor, Not Significant and Temporary
GMAG-074	Water Environment	6,4.5. Construction-Phase Risks Construction activities pose significant contamination risks, including: - trenching and dewatering - silt mobilisation - fuel and chemical spills - concrete washout - disturbance of permeable soils - accidental release of drilling fluids No detailed Construction Environmental Management Plan (CEMP) has been provided, and no hydrogeological risk assessment has been undertaken. Planning Weight: The failure to assess construction-phase contamination risks renders the ES incomplete. Substantial negative weight must be attached to the applicant's case.	The construction of the Scheme has been assessed in the ES [APP-036 to APP-195], which also identifies mitigation measures. The Outline CEMP [APP-196] is designed with the objective of securing the relevant environmental mitigation measures set out within the ES, including the management of contamination risks. The mitigation measures include storage of chemicals in a secure impermeable bunded area, provision of spillage kits and oil drip trays and storage/handling of materials to be undertaken in temporary compounds/designated areas away from main rivers and watercourses. Requirement 13 in Schedule 2 to the draft DCO [AS-032] secures that a CEMP must be submitted to and approved by the relevant planning authority, and that the CEMP must be substantially in accordance with the Outline CEMP [APP-196]. All construction works must be carried out in accordance with the approved CEMP.
GMAG-075	Water Environment	6.5. Flood Risk and Drainage Failures	Geological and groundwater level information has been provided through historic boreholes in the vicinity of the

ID	Theme	Representation	Applicant's Response
		The applicant has not provided a credible or evidence-based assessment of flood risk or drainage performance for a development of this scale. No infiltration testing has been undertaken, no groundwater levels have been confirmed, and no modelling has been provided for exceedance flows, winterbourne pathways or dual-catchment flood routing. The drainage strategy is therefore unsupported by baseline data and cannot be relied upon to demonstrate compliance with EN-1, EN-5, the EIA Regulations or the NPPF. The site's hydrological characteristics — permeable Chalk, shallow groundwater, intermittent groundwater-linked drainage features and a dual-catchment divide — significantly increase the risk of uncontrolled infiltration, rapid contaminant transport and unpredictable flood behaviour. None of these factors have been assessed.	Order Limits within ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184-186] which shows that the majority of the Site is underlain by Diamicton (also known as Boulder Clay) of the Lowestoft Formation. The Diamicton typically comprises clay which is variably sandy and gravelly – i.e., the Diamicton is predominantly cohesive and unlikely to provide sufficient conditions for infiltration drainage. It is recognised that the Diamicton may contain more granular lenses or layers, however these are not anticipated to be laterally or vertically extensive. As described in ES Volume 1, Chapter 16 Ground Conditions [APP-052] "<i>As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent</i>". The Conceptual Site Model presented in ES Volume 3, Appendix 16.1 - ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] will be refined through ground investigation. The Outline CEMP [APP-196] includes commitments (secured by DCO Requirement 13) to undertake ground investigation and states that "<i>The results of the ground investigation will be used to inform the detailed design</i>".

ID	Theme	Representation	Applicant's Response
			<i>of the Scheme</i>". This will be presented in a Tier 2 Generic Quantitative Risk Assessment (GQRA). The LLFA stated in a meeting on the 18 August 2026 that infiltration testing for detailed design would require a test/borehole at the location of each infrastructure (i.e. standalone converter/inverter unit. The locations of these units are not finalised and therefore undertaking testing at this stage could lead to abortive results Therefore, given the information within the historic boreholes close to the site and to avoid abortive testing that may not relate to the locations of infrastructure at detailed design, intrusive ground investigations including infiltration testing will be undertaken post-consent to inform the detailed surface water drainage design. The design of the Scheme has not yet been finalised and therefore the surface water drainage strategy is outline in its form but confirms the likely attenuation form and volume requirements. There is commitment for a drainage design to accommodate the 1 in 100 annual probability +45% allowance for climate change rainfall event as secured within the Design Principles, Parameters and Commitments [APP-213]. The surface water drainage design has been prepared in mind of pollution risk to aquifers and as such the surface water drainage systems for the BESS, National Grid and Project Substations will be lined with an

ID	Theme	Representation	Applicant's Response
			impermeable membrane to prevent runoff from infiltrating to the strata beneath as secured within the Design Principles, Parameters and Commitments [APP-213]. Commitment has also been made in this document to the provision of swales and filter drains for access track drainage. A proportionate assessment of flood risk has been undertaken for all sources within ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. The Environment Agency confirmed in a meeting in December 2025 that they were content with the approach to the assessment of fluvial and surface water flood risk.
GMAG-076	Water Environment	6.5.1 Inadequate Drainage Strategy The drainage strategy is based on assumptions rather than evidence. No infiltration testing (e.g. BRE365) has been undertaken, and no groundwater monitoring has been carried out. As a result, the applicant has not demonstrated: • whether infiltration is feasible • whether infiltration is safe on a vulnerable Chalk aquifer	Geological and groundwater level information has been provided through historic boreholes in the vicinity of the Order Limits within ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184-186] which shows that the majority of the Site is underlain by Diamicton (also known as Boulder Clay) of the Lowestoft Formation. The Diamicton typically comprises clay which is variably sandy and gravelly – i.e., the Diamicton is predominantly cohesive and unlikely to provide sufficient conditions for infiltration drainage. It is recognised that the Diamicton may contain more granular lenses or layers, however these are not anticipated to be laterally or vertically extensive.

ID	Theme	Representation	Applicant's Response
		- whether groundwater levels would compromise drainage features - whether infiltration could mobilise contaminants - whether the proposed drainage system can function during high groundwater conditions Without infiltration data, the drainage strategy cannot be validated and does not meet the requirements of EN-1, EN-5 or the EIA Regulations. Planning Weight: The drainage strategy is unsupported by evidence and cannot be relied upon. Substantial negative weight must be attached to the applicant's case.	The LLFA stated in a meeting on the 18th August 2026 that infiltration testing for detailed design would require a test/borehole at the location of each infrastructure (i.e. standalone converter/inverter unit. The locations of these units are not finalised and therefore undertaking testing at this stage could lead to abortive results. Therefore, given the information within the historic boreholes close to the site and to avoid abortive testing that may not relate to the locations of infrastructure at detailed design, intrusive ground investigations including infiltration testing will be undertaken post-consent to inform the detailed surface water drainage design. The geological baseline presented in ES Volume 1, Chapter 16 Ground Conditions [APP-052] is informed by a review of the relevant historical borehole information and shows that the chalk is located, at shallowest, approximately 12.5m below ground level. If infiltration were to be proposed, it would not be directly into the chalk. As described in ES Volume 1, Chapter 16 Ground Conditions [APP-052] "As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement

ID	Theme	Representation	Applicant's Response
			<i>for ground investigation to be undertaken post-consent".</i> 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 results of the ground investigation will be presented in an interpretative Tier 2 Generic Quantitative Risk Assessment (GQRA). Furthermore, 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. Overall, were contamination to be encountered that could be mobilised by infiltration, the contamination would be assessed and mitigated/remediated prior to the construction of the drainage feature. The design of the Scheme has not yet been finalised and therefore the surface water drainage strategy is outline in its form but confirms the likely attenuation form and volume requirements. There is commitment for a drainage design to accommodate the 1 in 100 annual probability +45% allowance for climate change rainfall event as secured within the Design Principles, Parameters and Commitments [APP-213]. The surface water drainage design has been prepared in mind of pollution risk to aquifers and as such the surface water drainage systems for the BESS, National

ID	Theme	Representation	Applicant's Response
			Grid and Project Substations will be lined with an impermeable membrane to prevent runoff from infiltrating to the strata beneath as secured within the Design Principles, Parameters and Commitments [APP-213] . Commitment has also been made in this document to the provision of swales and filter drains for access track drainage.
GMAG-077	Water Environment	6.5.2. Increased Runoff from Hardstanding The development introduces significant areas of hardstanding, including: - the BESS compound - the 400kV substation platform - access roads - cable routes - construction compounds These surfaces will increase runoff volumes and rates, particularly during intense rainfall. The applicant has not modelled: - increased peak flows - exceedance routes	The majority of the Order Limits is located over Diamicton which is indicated to be clay by historic boreholes (further geological information is provided in ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184-186]). 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 results of the ground investigation will be presented in an interpretative Tier 2 Generic Quantitative Risk Assessment (GQRA). The design of the Scheme has not yet been finalised and therefore the surface water drainage strategy is outline in its form but confirms the likely attenuation form and volume requirements. There is commitment for a drainage design to accommodate the 1 in 100 annual probability +45% allowance for climate change rainfall event as secured within the Design Principles, Parameters and Commitments [APP-213].

ID	Theme	Representation	Applicant's Response
		- runoff connectivity to the intermittent drainage feature - mobilisation of contaminants from hardstanding - downstream flood impacts Given the site's permeable soils and shallow groundwater, increased runoff poses a significant risk to both hydrology and water quality. Planning Weight: The absence of runoff modelling is a major deficiency. Substantial negative weight must be attached to the applicant's case.	The surface water drainage design has been prepared in mind of pollution risk to aquifers and as such the surface water drainage systems for the BESS, National Grid and Project Substations will be lined with an impermeable membrane to prevent runoff from infiltrating to the strata beneath as secured within the Design Principles, Parameters and Commitments [APP-213]. Commitment has also been made in this document to the provision of swales and filter drains for access track drainage and drainage for temporary drainage. Embedded pollution mitigation measures for the construction and decommissioning phases of the Scheme are set out and secured within the Outline CEMP [APP-196] and Outline DEMP [APP-198].
GMAG-078	Water Environment	6.5.3. Intermittent Drainage Feature Flood Pathways The site contains an intermittent groundwater-linked drainage feature that can convey water rapidly during recharge or storm events. The applicant has not assessed: flood routing along this feature	The Applicant Notes this comment. Embedded mitigation measures (flood risk and pollution management) have been included for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] including the storage of chemicals in a secure impermeable and bunded area, provision of spill kits, provision of bunds and silt traps and storage/handling of materials in temporary compounds/designated areas.

ID	Theme	Representation	Applicant's Response
		- pollutant mobilisation during high-flow events - interactions with shallow groundwater - downstream receptor impacts - the potential for exceedance flows to cross the hydrological divide Given the sensitivity of Chalk hydrology, this omission is significant and undermines the reliability of the ES. Planning Weight: The failure to assess flood pathways associated with intermittent drainage features is a serious omission. Substantial negative weight must be attached to the applicant's case.	Measures to manage fire risk at the BESS is contained within and secured by the Outline BSMP [APP-200]. The surface water drainage systems for the BESS, National and Project Substations will be lined with an impermeable membrane to prevent the percolation of runoff and any contamination to the strata beneath. Groundwater level information for the area is provided in ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184]. The report shows that there is significant thickness of Diamicton above the Chalk aquifers and groundwater is at significant depth. Therefore, there would no direct interaction between the Scheme and the groundwater table. The Scheme has applied as far as practicable a sequential approach to the location of infrastructure in areas of lowest flood risk and a Sequential Test has been undertaken as set out in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], with a commitment on locating infrastructure, compounds and stockpiles at least 10m away from watercourses as secured within the Design Principles, Parameters and Commitments [APP-213]. The solar panels will be PFAS free and will be cleaned with distilled water as set out and secured within the Outline OEMP [APP-197] in the Design Principles, Parameters and Commitments [APP-213]. As set out

ID	Theme	Representation	Applicant's Response
			in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] , the surface water drainage systems for the BESS, National Grid and Project Substations will incorporate a lined impermeable membrane to prevent the infiltration of runoff from these areas to the strata beneath. Detailed surface water drainage design is secured through DCO Requirement 11.
GMAG-079	Water Environment	6.5.4. Downstream Flood Risk The site drains towards two separate river systems: - the River Tas (a Chalk stream) - the River Waveney (supporting groundwater-dependent ecosystems) The applicant has not assessed: - downstream flood risk - cumulative impacts on either catchment - WFD compliance - the potential for deterioration in water body status	The Applicant Notes this comment. ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] provides an assessment of flood risk from all sources and embedded mitigation to demonstrate that the proposed infrastructure will remain operational for its lifetime and will not increase flood risk elsewhere in accordance with Section 5.8 of EN-1 and paragraph 2.3.3. of EN-5. The Scheme has applied as far as practicable a sequential approach to the location of infrastructure in areas of lowest flood risk and a Sequential Test has been undertaken as set out in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], with a commitment on locating infrastructure, compounds and stockpiles at least 10m away from watercourses as secured within

ID	Theme	Representation	Applicant's Response
		the interaction between increased runoff and sensitive habitats This omission is contrary to EN-1, EN-5 and the WFD. Planning Weight: The absence of downstream flood risk assessment is a major hydrological failure. Substantial negative weight must be attached to the applicant's case.	the Design Principles, Parameters and Commitments [APP-213]. Embedded mitigation measures (flood risk and pollution management) have been included for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Water receptors (including the River Tas and River Waveney) have been identified and assessed within ES Volume 1, Chapter 9 – Water Environment [APP-045]. With the incorporation of embedded mitigation measures the assessment concludes that impacts to water receptors arising from the Scheme are 'Not Significant', with the exception of the cessation of agricultural use which is assessed as 'Significant Major Beneficial'. ES Volume 3, Cumulative schemes in proximity to the Scheme will incorporate similar secured embedded mitigation measures to that of the Scheme and therefore the cumulative effects would be 'Not Significant', or 'Significant Major Beneficial' for cessation of agricultural use/fertilisers. Water Framework Directive (WFD) obligations are based on individual WFD waterbody catchment areas, and the River Tas, River Waveney and their connecting watercourses are sub-divided into multiple WFD waterbody catchments. All relevant WFD catchments

ID	Theme	Representation	Applicant's Response
			which may be impacted by the Scheme have been screened and where necessary, further assessed for WFD compliance within the Water Framework Directive Assessment [APP-163] .
GMAG-080	Water Environment	6.6. Policy Non-Compliance The Environmental Statement (ES) does not meet the minimum legal or policy requirements for assessing hydrological and hydrogeological impacts. The baseline is incomplete, key receptors have not been identified, and no modelling has been undertaken for groundwater, surface water, contamination pathways or flood risk. As a result, the ES fails to comply with the EIA Regulations 2017, the relevant National Policy Statements (NPS EN-1, EN-3 and EN-5) and the Water Framework Directive (WFD).	The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies. The NPPF does not contain specific policies for NSIP such as the Scheme. The Scheme will primarily be determined in accordance with the national policy statements (namely NPSs EN-1, EN-3 and EN-5). However, the NPPF may still be considered by the Secretary of State to the extent it is considered important and relevant to the decision. The NPPF and associated Planning Practice Guidance has been considered, where relevant, in the Planning Statement [APP-209] an update in respect of the new NPPF will be provided at Deadline 1. The Planning Statement [APP-209] demonstrates national policy compliance and how sustainable development has been achieved through the outcomes of the environmental impact assessment, good design and delivery of economic benefits. The Applicant directs to the response for GMAG-079 above for compliance with EN-1, EN-5 and WFD in relation to flood risk/water environment.

ID	Theme	Representation	Applicant's Response
GMAG-081	Water Environment Policy compliance	6.6.1 EIA Regulations (Regulation 14) Regulation 14 requires the ES to include: • a complete baseline • identification of receptors • assessment of likely significant effects • cumulative effects • reasonable alternatives The ES fails on all counts. Missing baseline data includes: • groundwater levels • infiltration rates • private water supplies • winterbourne/intermittent drainage behaviour • dual-catchment pathways • contamination modelling Without this information, the ES cannot lawfully assess significant effects.	Water receptors have been identified and assessment of effects provided within ES Volume 1, Chapter 9 – Water Environment [APP-045]. Baseline flood risk is provided in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. The ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] presents geological and hydrogeological data, informed by published and publicly available data sources. As described in ES Volume 1, Chapter 16 Ground Conditions [APP-052] <i>"As discussed at a meeting with the EA on 27 March 2025 it was agreed with the EA that a ground investigation will not be necessary to support the ES on the basis that the Outline CEMP will include a requirement for ground investigation to be undertaken post-consent"</i>. A Tier 1 Preliminary Risk Assessment (PRA) is also presented which includes assessment of risks to groundwater as a resource (including private water supplies). The assessment has been undertaken in accordance with the methodology agreed following scoping and uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. The groundwater abstractions identified (including private water supplies) within the Study Area are presented in tables 3.10 and

ID	Theme	Representation	Applicant's Response
		Planning Weight: This is a fundamental legal failure. Substantial negative weight must be attached to the applicant's case.	3.11 of the Phase 1 Ground Conditions Assessment [APP-184]. 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 results of the ground investigation will be presented in an interpretative Tier 2 Generic Quantitative Risk Assessment (GQRA). If / where the GQRA identifies potential hazards within this area, then further work (including the use of fate and transport models) may be undertaken as part of a Detailed Quantitative Risk Assessment. Furthermore, the Outline CEMP [APP-196] requires that Foundation Works Risk Assessment (FWRA) is undertaken 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. Where trenchless cable crossings interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196]. The design of the Scheme has not yet been finalised and therefore the surface water drainage strategy is outline in its form but confirms the likely attenuation

ID	Theme	Representation	Applicant's Response
			form and volume requirements. There is commitment for a drainage design to accommodate the 1 in 100 annual probability +45% allowance for climate change rainfall event as secured within the Design Principles, Parameters and Commitments [APP-213]. The surface water drainage design has been prepared in mind of pollution risk to aquifers and as such the surface water drainage systems for the BESS, National Grid and Project Substations will be lined with an impermeable membrane to prevent runoff from infiltrating to the strata beneath as secured within the Design Principles, Parameters and Commitments [APP-213]. Commitment has also been made in this document to the provision of swales and filter drains for access track drainage. The Applicant considers that the ES meets the requirements of Regulation 14.
GMAG-082	Water Environment Policy compliance	6.6.2. NPS EN-1 EN-1 requires applicants to: • assess groundwater vulnerability • identify private water supplies • assess contamination risks • provide a complete water environment baseline	The Applicant Notes this comment. Water receptors (including private water supplies) have been identified and assessment of effects provided within ES Volume 1, Chapter 9 – Water Environment [APP-045]. Embedded mitigation measures (flood risk and pollution management) have been included for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Measures to manage fire risk at the BESS

ID	Theme	Representation	Applicant's Response
		demonstrate that the development is safe The ES does not identify private water supplies, does not assess groundwater vulnerability and does not provide any hydrogeological risk assessment. Planning Weight: The proposal does not comply with EN-1. Substantial negative weight must be attached to the applicant's case.	is contained within and secured by the Outline BSMP [APP-200]. The Scheme has applied as far as practicable a sequential approach to the location of infrastructure in areas of lowest flood risk and a Sequential Test has been undertaken as set out in ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], with a commitment on locating infrastructure, compounds and stockpiles at least 10m away from watercourses as secured within the Design Principles, Parameters and Commitments [APP-213]. The solar panels will be PFAS free and will be cleaned with distilled water as set out and secured within the Outline OEMP [APP-197] in the Design Principles, Parameters and Commitments [APP-213]. As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], the surface water drainage systems for the BESS, National Grid and Project Substations will incorporate a lined impermeable membrane to prevent the infiltration of runoff from these areas to the strata beneath. Detailed surface water drainage design is secured through DCO Requirement 11. The solar panels are raised on narrow supports. Electrical infrastructure associated with the panel are set at the top of these supports and a significant

ID	Theme	Representation	Applicant's Response
			freeboard above ground level and anticipated flood depths. Commitments to solar panel freeboards are provided within and secured by the Design Principles, Parameters and Commitments [APP-213]. The above demonstrates that a sequential approach to location of infrastructure has been applied as far as practicable and the components of the Scheme can remain safe and operational for their relative lifetimes in accordance with Section 5.8 of EN-1. The ES Volume 3, Appendix 16.1 Phase 1 Ground Conditions Assessment [APP-184] presents a Tier 1 Preliminary Risk Assessment (PRA) which includes assessment of risks to groundwater as a resource (including Private Water Supplies). The assessment has been undertaken in accordance with the methodology agreed following scoping and on the basis of the available information, as provided by the Environment Agency, British Geological Survey and South Norfolk Council. The assessment uses a 250m Study Area for low ground disturbance works such as construction of PV arrays, and a 1km Study Area around structures that may require deeper piled foundations. With the inclusion of embedded mitigation measures for all phases of the Scheme as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-197], the risks to water receptors (including private water supplies) can be

ID	Theme	Representation	Applicant's Response
			suitably managed and impacts are therefore assessed as 'Not Significant'. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies. The NPPF does not contain specific policies for NSIP such as the Scheme. The Scheme will primarily be determined in accordance with the national policy statements (namely NPSs EN-1, EN-3 and EN-5). However, the NPPF may still be considered by the Secretary of State to the extent it is considered important and relevant to the decision. The NPPF and associated Planning Practice Guidance has been considered, where relevant, in the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. The Planning Statement [APP-209] demonstrates national policy compliance and how sustainable development has been achieved through the outcomes of the environmental impact assessment, good design and delivery of economic benefits.
GMAG-083	Water Environment Policy compliance	6.6.3. NPS EN-3 EN-3 requires BESS developments to assess: • firewater generation • chemical contamination	The measures for battery safety and storage, and management of firewater runoff is contained within the Outline BSMP [APP-200]. As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] and secured within the

ID	Theme	Representation	Applicant's Response
		• emergency drainage • environmental impacts of thermal runaway The ES contains no BESS firewater modelling, no PFAS assessment and no emergency containment design. Planning Weight: The proposal does not comply with EN-3. Substantial negative weight must be attached to the applicant's case.	Outline OEMP [APP-197], the BESS will have a surface water drainage system to capture firefighting water in the unlikely event of a fire incident water, which is underlain by an aggregate subbase lined with an impermeable membrane. An automated penstock (fitted with a self-actuating valve triggered by the detection of a fire) will also be incorporated at the downstream end of the BESS drainage system. Compliance with NPS EN-3 is set out within the Policy Compliance Document [APP-210]. Paragraph 2.4.4. of EN-3 refers to Section 5.8 of EN-1 and therefore the Applicant directs to the response for GMAG-082 for consideration of water.
GMAG-084	Water Environment Policy compliance	6.6.4. NPS EN-5 EN-5 requires substation developments to assess: • transformer oil spill risks • drainage and flood risk • groundwater contamination pathways • resilience to extreme weather The ES does not assess transformer oil spills, does not model drainage	As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018], the Substations (Project and National) will have surface water drainage systems that will be lined with an impermeable membrane to prevent runoff discharging uncontrolled to strata beneath. As set out and secured within the Outline OEMP [APP-197], transformers will be bunded/self-contained and <i>"All smaller fixed infrastructure (e.g. transformers) will be self-bunded to prevent any leaks from reaching the watercourse. If pollution is detected it will be suctioned to a self-bunded (or similar) tank and removed from site for suitable disposal"</i> and fuel/other chemicals will be in

ID	Theme	Representation	Applicant's Response
		performance and does not assess groundwater contamination pathways. Planning Weight: The proposal does not comply with EN-5. Substantial negative weight must be attached to the applicant's case.	bunded containers or stored within a suitable bunded impermeable area. Any pollution will be contained and removed from site. The Outline CEMP [APP-196] requires that Foundation Works Risk Assessment (FWRA) is undertaken 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. The Outline CEMP [APP-196] requires that Hydrogeological Risk Assessment is undertaken wherever trenchless crossings interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors. Compliance with NPS EN-5 is set out within the Policy Compliance Document [APP-210]. In relation to flood risk, paragraph 2.3.3. of EN-5 directs to Section 5.8 of EN-1. The provision of a Flood Risk Assessment and the embedded mitigation measures will ensure that the infrastructure proposed within the Scheme will remain operational for its lifetime, has been located outside of areas of flood risk as far as practicable and will not increase flood risk elsewhere in accordance with Section 5.8 of EN-1.
GMAG-085	Water Environment	6.6.5. Water Framework Directive	All relevant WFD catchments which may be impacted by the Scheme have been screened, the risk of deterioration has been assessed and where necessary,

ID	Theme	Representation	Applicant's Response
	Policy compliance	The WFD prohibits deterioration of water body status. The applicant has not: - identified the relevant water bodies - assessed deterioration risk - modelled contaminant pathways - assessed dual-catchment impacts - provided a WFD compliance assessment Given the vulnerability of the Chalk aquifer and the presence of groundwater-dependent ecosystems, the risk of deterioration is significant. Planning Weight: The proposal does not comply with the WFD. Substantial negative weight must be attached to the applicant's case.	further assessed for WFD compliance within the Water Framework Directive Assessment [APP-163]. ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163] is based on information available at the time of the Application of the Scheme under review in line with new information and assessments which become available as part of the future ongoing design process for the Scheme, where this information may have relevance to WFD requirements and objectives.
GMAG-086	Water Environment Cumulative impact	6.7. Cumulative Effects The site forms part of a concentrated cluster of energy infrastructure, including - the National Grid 400kV substation - the project substation	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the

ID	Theme	Representation	Applicant's Response
		- the BESS compound - solar arrays - overhead lines - access roads - construction compounds The applicant has not assessed the combined hydrological or hydrogeological impacts of this infrastructure cluster.	effects of the Scheme as a whole rather than individual elements in isolation. The combined effects from the Scheme on the water environment as assessed within ES Volume 3. Chapter 9 – Water Environment [APP-45] are assessed as 'Not Significant' with the exception of the cessation of agricultural use/fertiliser which is assessed as 'Significant Major Beneficial', as embedded mitigation measures applied across the whole Scheme are incorporated as set out and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198].
GMAG-087	Water Environment Cumulative impact	6.7.1. Great Moulton, Tivetshall St Margaret and Wacton Infrastructure Cluster The Great Moulton, Tivetshall St Margaret and Wacton cluster introduces extensive hardstanding, impermeable surfaces and construction disturbance within a small geographic area. This increases - runoff - infiltration of contaminants - soil compaction - flood risk	The Applicant notes this comment and directs to GMAG-086 above.

ID	Theme	Representation	Applicant's Response
		cumulative groundwater stress None of these cumulative effects have been assessed. Planning Weight: The absence of cumulative assessment is a major omission. Substantial negative weight must be attached to the applicant's case.	
GMAG-088	Water Environment Cumulative impact	6.7.2. Combined Hydrological Impact The applicant has not modelled: - increased runoff from multiple hardstanding areas - cumulative contamination pathways - combined flood routing - cumulative groundwater drawdown or disturbance - interactions between infrastructure components Given the site's hydrological sensitivity, cumulative impacts are likely to be significant. Planning Weight:	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. Attenuation volume requirements for surface water management from areas of hardstanding (notably the BESS, National Grid and Project Substations) are outlined within Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. The BESS and Substations (Project and National) will have surface water drainage systems that will be lined with an

ID	Theme	Representation	Applicant's Response
		The failure to assess combined hydrological impacts is a serious deficiency. Substantial negative weight must be attached to the applicant's case.	impermeable membrane to prevent runoff discharging uncontrolled to strata beneath. Commitment has also been made in the Design Principles, Parameters and Commitments [APP-213] for the provision of swales and filter drains for access track drainage. Detailed surface water drainage design is secured through DCO Requirement 11. 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 results of the ground investigation will be presented in an interpretative Tier 2 Generic Quantitative Risk Assessment (GQRA). Embedded mitigation measures (flood risk and pollution management) have been included for all phases of the Scheme as secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. Measures to manage fire risk at the BESS is contained within and secured by the Outline BSMP [APP-200]. With the incorporation of these embedded mitigation measures, cumulative impacts on the water environment are assessed within ES Volume 1, Chapter 9 – Water Environment [APP-045] as Not Significant, with the exception of impacts from the

ID	Theme	Representation	Applicant's Response
			cessation of agricultural use/chemicals which is assessed as a Significant Major Beneficial impact.
GMAG-089	Water Environment Cumulative impact	6.7.3. No Cumulative Modelling The ES contains no cumulative hydrological modelling. This is contrary to: • the EIA Regulations • EN-1 • EN-5 • standard hydrological practice Without cumulative modelling, the ES cannot demonstrate that the development is safe or environmentally acceptable. Planning Weight: The absence of cumulative modelling renders the ES incomplete. Substantial negative weight must be attached to the applicant's case.	The Applicant refers to its response to GMAG-088.
GMAG-090	Water Environment	6.8. Matters Requiring Clarification from the Applicant The following essential information has not been provided within the Environmental Statement and prevents	The Applicant refers to its response to GMAG-059, GMAG-085, and GMAG-088.

ID	Theme	Representation	Applicant's Response
		a lawful assessment of hydrological and hydrogeological impacts: • No groundwater model has been provided. • No infiltration testing (BRE365) has been undertaken anywhere within the Order Limits. • No groundwater level monitoring has been carried out. • No Private Water Supply survey has been undertaken. • No assessment of the intermittent groundwater-linked drainage feature (winterbourne) has been provided. • No dual-catchment hydrological assessment has been undertaken. • No modelling of BESS firewater, transformer oil spills or concrete leachate has been provided. • No drought-resilience or water-shortage assessment has been undertaken.	

ID	Theme	Representation	Applicant's Response
		- No assessment of the hydrological consequences of rainwater harvesting has been provided. - No explanation has been given for the inconsistency between Appendix 9.1 (FRA) and Appendix 9.3 (WRA). - No assessment of water-tanker HGV movements has been included in the Transport Assessment, CTMP or OTMP, despite the Water Resources Assessment confirming that tankering will be required. These omissions represent fundamental failures under Regulation 14 of the EIA Regulations and prevent the Examining Authority from assessing the likely significant effects of the Scheme.	
GMAG-091	Water Environment	6.9. Conclusions and Planning Weight The Great Moulton site is hydrologically and hydrogeologically unsuitable for a 400kV substation, BESS compound and associated infrastructure. The Environmental Statement (ES) is incomplete, internally inconsistent and non-compliant with the EIA Regulations,	The Applicant notes this summary comment and responses to these points of concern have been set out in the rows above. As set out above, compliance with NPS EN-1, EN-3, and EN-5 is set out within the Policy Compliance Document [APP-210].

ID	Theme	Representation	Applicant's Response
		NPS EN-1, EN-3, EN-5 and the Water Framework Directive (WFD). Across the three Major Issues identified in Section 6.0, the Applicant has failed to demonstrate: • that the Principal Aquifer can be protected from loss of recharge or contamination; • that a lawful, reliable or drought-resilient water supply exists for construction or operation; and that the Flood Risk Assessment (Appendix 9.1) and Water Resources Assessment (Appendix 9.3) form a coherent, integrated or deliverable water strategy. Key receptors — including private water supplies, shallow groundwater, intermittent drainage features, winterbourne pathways and dual-catchment hydrological flows — have not been identified, surveyed or assessed. No infiltration testing, groundwater monitoring, contaminant transport modelling,	

ID	Theme	Representation	Applicant's Response
		drought-resilience assessment or dual-catchment flood routing has been undertaken. The FRA and WRA are contradictory: the WRA relies on large-scale rainwater harvesting and winter storage, while the FRA makes no reference to rainwater harvesting and instead assumes infiltration or discharge to watercourses. This inconsistency confirms that the Applicant's water-supply strategy is not integrated into the drainage design, has not been assessed for hydrological impacts and is not deliverable. Because the ES baseline is incomplete, key hydrological risks remain unassessed and core documents contradict one another, the Applicant's conclusions on groundwater, surface water, flood risk, water quality and water availability cannot be relied upon Substantial negative weight must therefore be attached to the Applicant's case unless and until a complete, updated and Regulation-compliant hydrological, hydrogeological and water-resource assessment is provided.	

ID	Theme	Representation	Applicant's Response
GMAG-092	Ecology and Biodiversity Policy compliance	Ecology 7.1. Introduction and Summary of Concerns GMAG has significant concerns regarding the adequacy and lawfulness of the ecological assessment presented in the Environmental Statement (ES). The Great Moulton area supports a diverse range of habitats and species protected under the Wildlife and Countryside Act 1981, the Conservation of Habitats and Species Regulations 2017, the NERC Act 2006 and the NPPF. These include hedgerows, mature trees, arable margins, grassland, watercourses, ponds and woodland edges, which together form a coherent ecological network supporting bats, birds, amphibians, invertebrates and mammals. The ES does not provide a complete or legally compliant assessment of ecological impacts. Key surveys are missing, incomplete or out of date; important receptors have not been identified; and cumulative effects have	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], presents the likely effects on ecology and biodiversity, together with mitigation measures Due consideration has been made to relevant legislation, policy and guidance in undertaking the ecological assessment. Further details are set out within Section 8.3 of the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. 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 compensate through the design process. The ES [APP-036 to APP-195] and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes, with details of qualifications, experience and professional institute membership provided within ES Volume 3, Appendix 1.2 – Statement of Expertise [APP-112]. In relation to the sufficiency and currency of surveys, the Applicant draws attention to Section 8.5 and Table 8.7 of ES Volume 1, Chapter 8 [APP-044] and the supporting technical appendices, including the Ecological Desk Study and Extended Habitat Survey [AS-017]. A comprehensive suite of baseline ecological

ID	Theme	Representation	Applicant's Response
		not been assessed. As a result, the ES fails to meet the requirements of: • EIA Regulations 2017 (Regulation 14) • NPS EN-1, EN-3 and EN-5 • NPPF (2023) • Natural England standing advice • CIEEM survey standards The scheme would result in the loss, fragmentation and degradation of habitats, with significant impacts on protected species and ecological connectivity. GMAG submits that the ecological assessment is incomplete, inconsistent and insufficient to support a lawful decision.	surveys was undertaken between 2024 and 2026 in accordance with the CIEEM Guidelines for Ecological Impact Assessment (v1.3), the agreed EIA Scoping Opinion at ES Volume 3, Appendix 2.2 [APP-114], and Natural England guidance. The Applicant confirms that receptors including hedgerows, mature trees, arable margins, grassland, watercourses, ponds, woodland edges, and the range of protected and priority species referenced (bats, birds, amphibians, invertebrates and mammals) have been identified, evaluated and assessed within ES Volume 1, Chapter 8 [APP-044]. Mitigation is secured through the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161], each of which is designed with the objective of securing the relevant ecological mitigation measures and setting out monitoring and reporting arrangements. Detailed management plans and a Protected Species Mitigation Strategy will be submitted to and approved by the relevant planning authority in accordance with Requirements 7, 8, 13, 14 and 21 of the Draft DCO [AS-032]. The Green Infrastructure Strategy [AS-005] demonstrates the proposed landscape and ecological measures, with prescriptions and management set out in the Outline LEMP [APP-199], and the Biodiversity Net Gain Report [APP-218] demonstrates that the Scheme has the potential to

ID	Theme	Representation	Applicant's Response
			deliver 37.42% gain for habitats, 31.35% gain for hedgerows and 16.08% gain for watercourses. A commitment to a minimum of 10% BNG is secured through Requirement 9 of the Draft DCO [AS-032]. Cumulative and in-combination effects have been assessed in accordance with the EIA Regulations 2017 and PINS Advice on Cumulative Effects Assessment (September 2024). Section 8.12 of ES Volume 1, Chapter 8 [APP-044] presents the biodiversity cumulative effects assessment. Effects on European sites are considered further in the Shadow Habitats Regulations Assessment [AS-036], which concludes that no likely significant effects on the integrity of relevant protected sites, alone or in-combination, have been identified. Taking into account the proposed embedded mitigation measures, the ES concludes that the residual impacts as a result of the construction, operational and maintenance and decommissioning phases of the Scheme are not likely to be significant, with significant beneficial effects predicted at the local scale for native hedgerows, ponds, rivers, lowland deciduous woodland, scrub, other neutral grassland, ditches, breeding birds, skylark, badgers, water vole and otters.
GMAG-093	Ecology and Biodiversity	7.2 Baseline Ecological Context The Great Moulton landscape is characterised by:	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], presents the likely effects on ecology and biodiversity, together with mitigation measures.

ID	Theme	Representation	Applicant's Response
		- species-rich hedgerows - mature trees and tree lines - arable margins and grassland - small woodland blocks - watercourses and ditches - ponds and wet depressions - dark corridors suitable for bats - farmland bird habitat - invertebrate-rich field edges These features support a range of species, including: - bats (multiple species) - breeding and wintering birds - barn owl - badger - great crested newt (GCN) - reptiles - brown hare - priority invertebrates	The Applicant confirms that receptors including hedgerows, mature trees, arable margins, grassland, watercourses, ponds, woodland edges, and the range of protected and priority species referenced (bats, birds, amphibians, invertebrates and mammals) have been identified, evaluated and assessed within ES Volume 1, Chapter 8 [APP-044]. Mitigation is secured through the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161], each of which is designed with the objective of securing the relevant ecological mitigation measures and setting out monitoring and reporting arrangements. Detailed management plans and a Protected Species Mitigation Strategy will be submitted to and approved by the relevant planning authority in accordance with Requirements 7, 8, 13, 14 and 21 of the Draft DCO [AS-032].

ID	Theme	Representation	Applicant's Response
		The ES does not provide a legally adequate description of these receptors or their conservation status.	
GMAG-094	Ecology and Biodiversity	7.3.1. Deficiencies in the Applicant's Ecological Surveys Incomplete Bat Surveys The ES lacks: • full-season bat activity surveys • transect coverage across the entire site • static detector data for key commuting corridors • assessment of dark corridors • assessment of cumulative lighting impacts This is contrary to: • Bat Conservation Trust (BCT) Survey Guidelines (3rd edition) • CIEEM Guidelines for Ecological Impact Assessment • Habitats Regulations (EPS protection)	A suite of bat surveys has been completed with methods in accordance with the most recent guidance from the Bat Conservation Trust (BCT) guidelines, 4th edition (Collins, 2023). The scope of ecological surveys and their methodologies, including in relation to bats, have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of specific ecological surveys is presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160], with Appendix 8.5 and Appendix 8.6 specifically relating to bat surveys. An assessment of potential effects of the Scheme on bats during construction, operation, and decommissioning is set out within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. This has been prepared with reference to best practice guidance published by the Chartered Institute for Ecology and Environmental Management (CIEEM, 2018 and Reason, PF. & Wray, S. 2025) and as detailed in British Standard 42020:2013 Biodiversity - Code of Practice for Biodiversity and Development (BSI, 2013). The scope of assessment has also been agreed through the scoping and consultation process, as described in

ID	Theme	Representation	Applicant's Response
		Without legally compliant survey effort, no lawful assessment of bat impacts is possible.	Section 8.2 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Measures to enable the Scheme to progress without undue risk of contravening the legislation by which bats and their roosts are protected (the Habitats Regulations and Wildlife and Countryside Act) are secured through the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161], each of which is designed with the objective of securing the relevant ecological mitigation measures and setting out monitoring and reporting arrangements. Detailed management plans and a Protected Species Mitigation Strategy will be submitted to and approved by the relevant planning authority in accordance with Requirements 7, 8, 13, 14 and 21 of the Draft DCO [AS-032].
GMAG-095	Ecology and Biodiversity	7.3.2 Inadequate Hedgerow and Habitat Connectivity Assessment Hedgerows are priority habitats under the NERC Act and may qualify as Important Hedgerows under the Hedgerow Regulations 1997. The ES:	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including protected and notable habitats (including irreplaceable habitats as defined by the NPPF – see below). This includes specific consideration in relation to hedgerows and the effects of habitats loss or change, habitat fragmentation and habitat degradation, as set out within Section 8.9.

ID	Theme	Representation	Applicant's Response
		- does not provide a full hedgerow condition assessment - does not assess connectivity loss - does not assess fragmentation caused by access tracks, fencing or substations - does not assess cumulative corridor severance This is contrary to: - NPPF para. 186 (protection of irreplaceable habitats) - NPS EN-1 (biodiversity protection) - CIEEM guidance on ecological networks	Irreplaceable habitats as defined by the NPPF (August 2026) relate to ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen; and as such, do not include individual hedgerows unless otherwise related to the habitats as listed. Due consideration has been made to relevant legislation, policy and guidance (including the NPPF, NPS EN-1 and relevant guidance) in undertaking the ecological assessment. Further details are set out within Section 8.3 of the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing), with prescriptions and management set out in the Outline LEMP [APP-199]. The Biodiversity Net Gain Report [APP-218] demonstrates that the Scheme is able to deliver 31.35% gain for hedgerows. A commitment to a minimum of 10% BNG is secured through Requirement 9 of the Draft DCO [AS-032].
GMAG-096	Ecology and Biodiversity	7.3.3. Missing Winter Bird Surveys The ES does not include: - wintering bird surveys - farmland bird assemblage assessments	The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees, as described in Section 8.2 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Through this process, it was agreed that the Scheme would result in an overall benefit to wintering / passage

ID	Theme	Representation	Applicant's Response
		• barn owl activity surveys • vantage point surveys for raptors This is contrary to: • BTO survey standards • NPPF para. 187 (priority species protection) • EIA Regulations (complete baseline requirement) Species of conservation concern (skylark, yellowhammer, linnet, lapwing, barn owl, swifts) have not been lawfully assessed.	birds. On this basis, PINS was content to scope impacts on wintering / passage birds out of the assessment.
GMAG-097	Ecology and Biodiversity	7.3.4 Great Crested Newt (GCN) and Amphibians The ES does not provide: • eDNA surveys for all ponds within 500m • terrestrial habitat assessments • connectivity analysis • assessment of construction impacts on dispersal routes This is contrary to:	Field surveys relating to great crested newts and their habitats have been completed in accordance with relevant guidance. The scope of ecological surveys and their methodologies, including in relation to great crested newts, have been agreed through scoping and consultation processes with relevant statutory consultees. The results and detailed methodology of specific ecological surveys is presented in ES Volume 3, Appendix 8.1 – 8.9 [APP-152 – APP-160], with Appendix 8.3 specifically relating to great crested newt surveys. An assessment of potential effects of the Scheme on great crested newts during construction and

ID	Theme	Representation	Applicant's Response
		- Natural England GCN Survey Guidelines - Habitats Regulations (EPS protection) - EIA Regulations (complete baseline)	decommissioning is set out within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. This has been prepared with reference to best practice guidance published by the Chartered Institute for Ecology and Environmental Management (CIEEM, 2017; 2018) and as detailed in British Standard 42020:2013 Biodiversity - Code of Practice for Biodiversity and Development (BSI, 2013). The scope of assessment, to exclude operational phase impacts on great crested newts, has also been agreed through the scoping and consultation process, as described in Section 8.2 of the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Measures to enable the Scheme to progress without undue risk of contravening the legislation by which great crested newts are protected (the Habitats Regulations and Wildlife and Countryside Act) are secured through the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161], each of which is designed with the objective of securing the relevant ecological mitigation measures and setting out monitoring and reporting arrangements. Detailed management plans and a Protected Species Mitigation Strategy will be submitted to and approved by the relevant planning authority in accordance with

ID	Theme	Representation	Applicant's Response
			Requirements 7, 8, 13, 14 and 21 of the Draft DCO [AS-032] .
GMAG-098	Ecology and Biodiversity	7.3.5 Badger and Mammal Surveys The ES lacks: • up-to-date badger surveys • sett mapping • assessment of construction disturbance • assessment of foraging habitat loss This is contrary to: • Protection of Badgers Act 1GG2 • CIEEM survey standards	ES Volume 3, Appendix 8.7 - Badger Survey Report (Confidential) presents the results of badger surveys within the Order Limits carried out between April 2024 and January 2026 within the two year widely accepted shelf life of data validity. Sett types and usage are classified in accordance with best practice guidance. Setts and signs of badger are mapped within Figure 1, Sheets 1 to 11 within Appendix 8.7. The Applicant confirms that badgers as a receptor have been identified, evaluated and assessed for impacts on construction, operation and decommissioning as well and an assessment of foraging habitat loss within ES Volume 1, Chapter 8 [APP-044]. Mitigation to enable the Scheme to progress without undue risk of contravening the legislation by which badgers and their setts are protected (the Protection of Badgers Act) are secured through the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161], each of which is designed with the objective of securing the relevant ecological mitigation measures and setting out monitoring and reporting arrangements. Detailed management plans and a Protected Species Mitigation Strategy will be submitted to and approved by the relevant planning authority in accordance with

ID	Theme	Representation	Applicant's Response
			Requirements 7, 8, 13, 14 and 21 of the Draft DCO [AS-032] .
GMAG-099	Ecology and Biodiversity	7.3.6 Invertebrates and Arable Margins The site contains habitats known to support priority invertebrates. The ES includes no targeted invertebrate surveys, contrary to: • CIEEM Invertebrate Survey Guidelines • NPPF para. 186–187	ES Volume 3, Appendix 8.2 - Invertebrate Survey Report [APP-153], presents the results of invertebrate surveys within the Order Limits providing a wide range of surveys within the Site to provide a broad, or 'high-level' understanding of the value of the Order Limits for invertebrate assemblages, in particular the invertebrates of field verges and margins potentially disturbed by proposed construction and decommissioning phases and/or in proximity to arrays during the operational and maintenance phase. In this regard the objectives are to characterise the assemblage of invertebrates in terms of taxonomic composition, the main habitat and microhabitat associations, the presence of specialist species and also the presence of rare, scarce or otherwise significant species. The Applicant confirms that invertebrates as a receptor have been identified, evaluated and assessed within ES Volume 1, Chapter 8 [APP-044]. Mitigation is secured through the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161], each of which is designed with the objective of securing the relevant ecological mitigation measures and setting out monitoring and reporting arrangements.

ID	Theme	Representation	Applicant's Response
			Detailed management plans and a Protected Species Mitigation Strategy will be submitted to and approved by the relevant planning authority in accordance with Requirements 7, 8, 13, 14 and 21 of the Draft DCO [AS-032] .
GMAG-100	Arboriculture	7.4 Habitat Loss, Fragmentation and Degradation 7.4.1 Loss of Hedgerows and Trees The scheme would result in: • direct hedgerow removal • indirect degradation from shading, dust and disturbance • fragmentation of ecological corridors • loss of connectivity between woodland blocks This is contrary to: • NERC Act 2006 (Section 40 duty to conserve biodiversity) • NPPF para. 186 (irreplaceable habitats)	The Applicant acknowledge that there will be loss of hedgerow and trees. The findings of the arboricultural Impact Assessment is presented in ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]. The Applicant is committed to undertaking a further pre-construction survey and Arboricultural Method Statement in advance of the construction works. Impact on hedgerows are presented in Appendix 1 of the Outline LEMP [APP-199]. To reduce the indirect degradation raised by the respondent, the minimum offset distances that will be applied to ecological and landscape features. These are secured through the Design Principles, Parameters and Commitments [APP-213] and Works Plan [AS-002 and AS-003], and have taken into account best practice, feedback during consultation and site-specific environmental conditions informed by surveys and the environmental assessment process. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing

ID	Theme	Representation	Applicant's Response
			existing hedgerows (infill planting/laying coppicing). New woodland belts and native tree planting provide screening to the Scheme as well as improves biodiversity and supports green infrastructure connectivity. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032].
GMAG-101	Arboriculture	7.4.2. Severance of Ecological Corridors The co-location of multiple infrastructure elements creates a hard barrier across the landscape, severing: • bat commuting routes • bird flight lines • mammal movement corridors • amphibian dispersal routes This is contrary to: • NPPF para. 187 (ecological networks) • EN-1 (connectivity protection)	Embedded design principles are detailed within Appendix 7.18 Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2 Figure 4.1 Indicative Masterplan [APP-059]. These include a 30m standoff distance from ancient woodlands, at least 15m from woodlands, 10m from watercourses, and a minimum of 10m buffer between hedgerows/ditches and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199]. In adherence to the Overarching National Policy Statement for Energy (EN-1) when considering the scale of the Scheme, this, will result in a significant

ID	Theme	Representation	Applicant's Response
			amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced connectivity through the site. In addition, the above-named documents also include commitments, to extensive buffering of woodlands/ancient woodlands, ponds, trees, and watercourses and will include habitat creation/management within these buffer zones. Thereby, resulting in extensive landscape-wide habitat provision for the benefit of all local species.
GMAG-102	Lighting Ecology and Biodiversity	7.4.3. Lighting Impacts Lighting from: • substations • BESS • security fencing • access roads will affect: • bats • barn owl • nocturnal invertebrates • Mammals No lighting assessment has been provided, contrary to:	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of lighting from the Scheme on important ecological features; including light sensitive species such as bats. Due consideration has been made to relevant legislation, policy and guidance (including the NPPF, NPS EN-1 and relevant guidance) in undertaking the ecological assessment. Further details are set out within Section 8.3 of the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Controls around lighting during construction are set out in S Volume 3, Appendix 7.11 – Lighting Strategy [APP-151], implemented in accordance with Requirements of the Draft DCO [AS-032]. Legislation, policy and guidance (including the NPPF, NPS EN-1 and the Institute of Lighting Professionals (ILP) Guidance Note on bats and artificial lighting in the UK (GN08)) relevant to the S

ID	Theme	Representation	Applicant's Response
		- BCT lighting guidance (2018) - NPPF para. 185 (minimising light pollution) - EN-1 (minimising operational impacts)	Volume 3, Appendix 7.11 – Lighting Strategy [APP-151] are detailed within Section 2 of the document. The ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151] includes avoidance of extensive night-time working, lighting to be positioned to ensure that light is directed onto the area of works only avoiding trees with roosting bat potential and off-site trees/woodland/buildings potentially utilised by roosting bat species, the use of LED lighting and cowls, hoods and other similar screens. The lighting strategy for the operational phase is provided in the Outline OEMP [APP-197]. This details how artificial lighting will avoid adverse impacts on ecological receptors sensitive to artificial lighting, such as bats. The Outline DEMP [APP-198] will set out the methods by which decommissioning activities will be managed to avoid, minimise and mitigate any adverse effects such as these upon all trees (including those with roosting bat potential), including information regarding lighting management and tree protection measures to protect potential roost sites.
GMAG-103	Ecology and Biodiversity	7.4.4. Noise and Disturbance Operational noise from: - transformers - cooling systems	The assessment of operational noise is presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The assessment includes consideration of low-frequency noise, tonality characteristics and cumulative effects. The Applicant is unaware of which key

ID	Theme	Representation	Applicant's Response
	Noise and Vibration	• inverters • fans Operational noise has not been assessed for ecological receptors, contrary to: • EN-1 (operational disturbance) • CIEEM EcIA guidance	receptors are missing, and how the ES underestimates the impacts. The assumptions and limitations of the noise and vibration assessment are presented within Section 12.4 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The assumptions provide a robust assessment to ensure that the impacts are not underestimated. Whilst transformers, cooling systems, inverters and fans haven't been individually assessed within ES Volume 1 Ch 8 Ecology and Biodiversity [APP-044], noise levels associated with construction, operation and decommissioning have been assessed. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.
GMAG-104	Ecology and Biodiversity Lighting	7.5. Impacts on Protected Species 7.5.1 Bats Impacts include: • loss of foraging habitat • loss of commuting routes • lighting disturbance • collision risk with overhead lines	To inform the assessment included in ES Volume 1 Ch 8 Ecology and Biodiversity [APP-044] the Applicant has undertaken a desk study, Appendix 8.1 Ecological Desk Study and Extended Habitat Survey [APP-152], and sought to understand the assemblage of bats through the Ground Level tree Assessment Report [APP-156] and the Bat Activity Survey Report [APP-157]. To safeguard the species identified, the Applicant has adopted a precautionary measure, through embedded

ID	Theme	Representation	Applicant's Response
		fragmentation of dark corridors The ES does not provide a lawful assessment under the Habitats Regulations. CPRE Dark Skies Evidence ES Figure 7.4 (CPRE Dark Skies Map) confirms that the Great Moulton area lies within some of the darkest rural skies in Norfolk (0.25–1 nW/cm²/sr). This dark-sky baseline is essential for light-averse species such as barbastelle bats, brown long-eared bats and nocturnal invertebrates. Despite this, the Lighting Strategy confirms operational lighting at the National Grid Substation, the project substation and the BESS, yet the ES contains no assessment of ecological lighting impacts, no modelling of light spill, and no evaluation of effects on bat commuting corridors or foraging habitat. This is a significant omission.	design principles detailed within Appendix 7.18 Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2 Figure 4.1 Indicative Masterplan [APP-059]. These include a 30m standoff distance from ancient woodlands, at least 15m from woodlands, 10m from watercourses, and a minimum of 10m buffer between hedgerows/ditches and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199]. When considering the scale of the Scheme, this, will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure. In addition, the above-named documents also include commitments, to extensive buffering of woodlands/ancient woodlands, ponds, trees, and watercourses and will include habitat creation/management within these buffer zones. Thereby, resulting in extensive landscape-wide habitat provision for the benefit of all local bat populations (amongst other species).

ID	Theme	Representation	Applicant's Response
			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 cowl, hoods and other similar screens will also be adopted. Any unavoidable 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.

ID	Theme	Representation	Applicant's Response
			For further information see the Schemes ES Volume 3, Appendix 7.11 Lighting Strategy [APP151]. The Applicant disagrees that Solar PV (in a arable landscape setting) presents a significant collision risk to bats. The Natural England publication '<i>Evidence Review of the Impact of Solar Farms on Birds, Bats and General Ecology (NEER012)</i>' states that '<i>incidental and informal evidence suggests that the collision risk presented by solar panels to birds is low but not impossible. It is likely that the infrastructure associated with transporting electricity (e.g. powerlines) presents more of a collision risk for birds than the solar arrays themselves. With regards collision risk to bats, there is no evidence</i>'. The Scheme does not propose any significant increase in overhead lines (which are already present within Site 1 (proposed National Grid point of connection). Within their Relevant Representations response, Natural England agreed with the conclusions of the Shadow Habitats Regulations Assessment [APP-220] that there will be no likely significant adverse effects at Norfolk Valley Fens SAC, The Broads SAC, Broadland SPA and Broadland Ramsar internationally designated sites.
GMAG-105	Ecology and Biodiversity	7.5.2 Birds Impacts include:	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of impacts from the Scheme on breeding birds, including Priority Species, and other species of

ID	Theme	Representation	Applicant's Response
		• loss of nesting habitat • disturbance during construction • loss of winter foraging habitat • displacement from noise and lighting • collision risk with overhead lines Farmland birds are a priority group The ES does not comply with: • Wildlife and Countryside Act 1981 (nesting birds) • NPPF para. 187 (priority species)	conservation concern. The scope of ecological surveys and their methodologies have been agreed through scoping and consultation processes with relevant statutory consultees, as described in Section 8.2 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Through this process, it was agreed that the Scheme would result in an overall benefit to wintering / passage birds. On this basis, PINS was content to scope impacts on wintering / passage birds out of the assessment. Mitigation measures for birds, to enable the Scheme to progress without undue risk of contravening the legislation by which nesting birds are protected (the Wildlife and Countryside Act) are set within ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy (OSPMS) [APP-161]. The OPSMS has been informed by extensive baseline ecological surveys and desk study undertaken between May 2024 and January 2026 and addresses the needs for ecological protection and mitigation within the construction phase as identified by the impact assessment ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The OPSMS follows the guidelines set out within the Biodiversity – Code of Practice for Planning and Development (British Standard, 42020:2013). A detailed Protected Species Mitigation Strategy, substantially in accordance with the measures and

ID	Theme	Representation	Applicant's Response
			principles set out within the OPSMS, will be submitted to and approved by the relevant planning authorities pursuant to a Requirement in the Development Consent Order (DCO) prior to the construction of the Scheme. Operational mitigation measures are detailed within the Outline LEMP [APP-199], with further detail provided within the LEMP (secured by Requirement 7 of the Draft DCO [AS-032]) and updated as appropriate in subsequent iterations. Proposed mitigation is based on standard industry approaches, with a high certainty of success, and with measures in place to manage and monitor.
GMAG-106	Ecology and Biodiversity	7.5.3 Barn Owl Barn owl is highly sensitive to: • lighting • noise • loss of rough grassland • fragmentation of hunting territories No assessment has been undertaken, contrary to: • Barn Owl Trust survey guidance • NPPF para. 187	The Applicant refers to its response to GMAG-105, which is also relevant to barn owl.

ID	Theme	Representation	Applicant's Response
GMAG-107	Ecology and Biodiversity	7.5.4. Great Crested Newt Impacts include: • loss of terrestrial habitat • severance of dispersal routes • construction disturbance • increased mortality risk The ES does not meet Natural England licensing requirements.	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], presents the likely significant effects on ecology and biodiversity including great crested newts. Mitigation is secured through the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161], each of which is designed with the objective of securing the relevant ecological mitigation measures and setting out monitoring and reporting arrangements. Detailed management plans and a Protected Species Mitigation Strategy will be submitted to and approved by the relevant planning authority in accordance with Requirements 7, 8, 13, 14 and 21 of the Draft DCO [AS-032]. Please refer to the Applicant's Response at GMAG-097.
GMAG-108	Ecology and Biodiversity	7.5.5. Badger Impacts include: • sett disturbance • loss of foraging habitat • construction disturbance • increased road mortality No mitigation has been proposed.	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], presents the likely effects on ecology and biodiversity including badger. Mitigation is secured through the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline DEMP [APP-198], Outline LEMP [APP-199] and ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161], each of which is designed with the objective of securing the relevant ecological mitigation measures and setting out

ID	Theme	Representation	Applicant's Response
		The ES does not comply with the Protection of Badgers Act 1GG2.	monitoring and reporting arrangements. Detailed management plans and a Protected Species Mitigation Strategy will be submitted to and approved by the relevant planning authority in accordance with Requirements 7, 8, 13, 14 and 21 of the Draft DCO [AS-032]. Please refer to the Applicant's Response as GMAG-098.
GMAG-109	Ecology and Biodiversity Policy compliance	7.6 Policy Non-Compliance 7.6.1 EIA Regulations The ES fails to meet Regulation 14, which requires: • a complete baseline • identification of receptors • assessment of likely significant effects • cumulative assessment 7.6.3. NPS EN-1 Requires: • protection of biodiversity • avoidance of significant harm • robust evidence base	Please refer to the responses provided above, specifically GMAG-092. The Policy Compliance Document [APP-210], which sets out how the Scheme complies with the relevant policy tests of NPS EN-1, NPS EN-5 and the NPPF, including protection of biodiversity, avoidance of significant harm, and the robustness of the evidence base. There would be no loss of, or impacts on, irreplaceable habitats (Ancient Woodland, veteran trees and lowland fen), which are avoided through offset buffers and Avoidance Areas set out in the Design Principles, Parameters and Commitments [APP-213] and the Outline Cable Route Construction Statement [APP-216]. The Biodiversity Net Gain Report [APP-218] demonstrates that the Scheme is able to deliver a measurable net gain of 37.42% for habitats, 31.35% for hedgerows and 16.08% for watercourses, applying the statutory biodiversity metric.

ID	Theme	Representation	Applicant's Response
		Not demonstrated. 7.6.4. NPS EN-5 Requires assessment of: • overhead line impacts • bird collision risk • habitat fragmentation Not provided. 7.6.5. NPPF Requires: • measurable net gain • protection of irreplaceable habitats • avoidance of significant harm Not demonstrated.	The ES concludes that, with the embedded and additional mitigation measures in place, no significant residual adverse ecology and biodiversity effects are anticipated, with significant beneficial effects predicted at the local scale for a range of habitats and species, secured through the Requirements in Schedule 2 of the Draft DCO [AS-032]. The NPPF does not contain specific policies for nationally significant infrastructure projects. The Applicant considers the ES [APP-036 to APP-195] to fully satisfy the requirements of Regulation 14.
GMAG-110	Ecology and Biodiversity Cumulative impact	7.7. Cumulative Ecological Effects The Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster creates: • large-scale habitat loss • corridor severance • increased lighting	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. Notably, the ecological effects of the Scheme as a whole are considered within Sections

ID	Theme	Representation	Applicant's Response
		- increased noise - increased human activity The ES does not assess cumulative impacts on: - bats - birds - GCN - badger - invertebrates - hedgerows - woodland edges This is a major omission.	8.5 – 8.11 of the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Separately to the ecological assessment of the Scheme as a whole, Section 8.12 of the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] presents an assessment of cumulative effects between the Scheme and other existing and/or approved developments a 'Cumulative Effects Assessment'). Taking into account the proposed embedded mitigation measures, the residual impacts as a result of the construction, operational and maintenance and decommissioning phases of the Scheme are not likely to be significant. On this basis there is no mechanism for cumulative effects on any other development/scheme's as identified on the short-list provided in ES Volume 3, Appendix 2.4 Cumulative Schemes [APP-116], nor will the Scheme result in a cumulative effect on those Important Ecological Features identified within the chapter. Consequently, a Cumulative Effects Assessment on the individual features listed is not warranted.
GMAG-111	Ecology and Biodiversity	7.8. Conclusions and Planning Weight The ecological assessment is incomplete, inconsistent and non-compliant with the EIA Regulations, NPS EN-1, EN-3, EN-5, the NPPF, Natural England guidance and CIEEM	Please refer to the responses set out above (GMAG-092 to GMAG-110). Due consideration has been made to relevant legislation, policy and guidance in undertaking the ecological assessment. Further details are set out within

ID	Theme	Representation	Applicant's Response
		standards. The applicant has not demonstrated that ecological impacts have been properly assessed, avoided or mitigated. The scheme would result in: • significant habitat loss • fragmentation of ecological networks • impacts on protected species • degradation of priority habitats • cumulative ecological harm Planning Weight: Substantial negative weight must be attached to the ecological impacts of the scheme unless and until a complete, lawful and regulation-compliant ecological assessment is provided. The ES, as submitted, cannot be relied upon to support a lawful decision.	Section 8.3 of the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Compliance with NPS EN-1, EN-3, and EN-5, as well as the NPPF is set out within the Policy Compliance Document [APP-210].
GMAG-112	Landscape and Visual Cultural Heritage	Landscape, Visual and Heritage 8.1 Introduction and summary of concerns GMAG has major concerns regarding the landscape, visual and heritage impacts of the proposed development.	The Applicant acknowledges the concern over landscape and visual effects as a result of the Scheme. ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] presents an assessment of the likely effects Scheme and includes considerations of the worst-case scheme parameters including the BESS, Project Substations and the National Grid Substation.

ID	Theme	Representation	Applicant's Response
		The introduction of a 400kV National Grid substation, a second project substation, a large BESS compound, overhead lines, gantries, access roads and security infrastructure would fundamentally alter the character of the Great Moulton landscape. The Environmental Statement (ES) significantly underestimates the magnitude of these impacts. Key viewpoints are missing, the assessment is based on outdated scheme parameters, and the cumulative effects of the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster have not been assessed. The ES does not comply with NPS EN-1, EN-3, EN-5, the EIA Regulations, or the NPPF. The scheme would introduce industrial-scale infrastructure into a rural, tranquil landscape, resulting in: - substantial landscape character change - significant visual harm to residents, walkers and road users	The Applicant disagrees with the ES has underestimate the magnitude of effect, that key viewpoints have been omitted, the assessment is based on outdated Scheme parameters and cumulative effect not being assessed. The LVIA has been undertaken in accordance with the principles and guidance set out in the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) and is based on the Scheme parameters which form the Application. The assessment includes consideration of cumulative landscape and visual effects and applies a transparent and proportionate methodology to the evaluation of effects. View locations were identified through a combination of desk-based analysis, fieldwork and consultation with relevant stakeholders to ensure that the assessment considers a representative range of visual receptors and likely effects. The Applicant considers that the selected view locations provide an appropriate basis for assessing the significance of visual effects. The Applicant further acknowledges the concern over cultural heritage effects as a result of the Scheme. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] presents an assessment of direct and indirect impacts to the setting of heritage assets, which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement

ID	Theme	Representation	Applicant's Response
		- night-time lighting impacts - harm to the setting of heritage assets - cumulative industrialisation of the Great Moulton, Tivetshall St Margaret and Wacton cluster GMAG submits that the landscape and heritage assessment is incomplete, inconsistent and insufficient to support a lawful decision.	[APP-165 – APP-168], as well as historic landscape and below-ground archaeological remains, which is supported by ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS024] and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172].
GMAG-113	Landscape and Visual	8.2 Baseline Landscape Character The Great Moulton area is characterised by: - gently undulating farmland - hedgerows and hedgerow trees - small woodland blocks - open arable fields - rural lanes with enclosed, intimate character - long views across open countryside - dark skies and low night-time lighting - a tranquil, rural setting This landscape is valued for its:	The Applicant acknowledges the characteristics and qualities of the Great Moulton landscape identified by GMAG. The landscape baseline is presented in ES Volume 3, Appendix 7.2: Landscape Baseline [APP-119]. Great Moulton and Site 1 are located within Landscape Character Area (LCA) E2: Great Moulton Plateau Farmland. It is not clear how the respondent has defined the "Great Moulton area" for the purposes of their representation. However, many of the characteristics and landscape qualities identified by the respondent, including the predominantly rural character, agricultural land use, hedgerow network, woodland blocks and open views, are reflected within the published

ID	Theme	Representation	Applicant's Response
		• rural character • openness • tranquillity • agricultural heritage • recreational use • contribution to local identity The ES does not adequately describe or assess this baseline.	description and key characteristics of LCA E2 and are therefore recognised within the baseline assessment. The Applicant does not agree that the ES fails to adequately describe the baseline environment. The LVIA baseline has been informed by published landscape character assessments and field survey work undertaken in accordance with the principles of GLVIA3. Furthermore, the respondent's description does not fully reflect all characteristics of the receiving landscape. Whilst the landscape is predominantly rural in character, the published description of LCA E2 also identifies a number of detracting and human-influencing features, including large-scale agricultural buildings, water towers, telegraph poles and overhead utility infrastructure visible within the open landscape. The A140 also passes north-south through the character area and influences landscape character and perceptions of tranquillity in some locations. Similarly, the description of "enclosed rural lanes with an intimate character" is not representative of the LCA as a whole, which is generally characterised by an open, large-scale plateau landscape.
GMAG-114	Landscape and Visual	8.3 Deficiencies in the Applicant's Landscape and Visual Assessment	The LVIA presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] considers the maximum Scheme parameters submitted as part of the

ID	Theme	Representation	Applicant's Response
		8.3.1 Assessment Based on Outdated Scheme Parameters The LVIA appears to have been prepared before the escalation to a 400kV National Grid substation. As a result, it does not reflect: - the true height and massing of 400kV equipment - the expanded footprint of the Great Moulton, Tivetshall St Margaret and Wacton cluster - the increased number of gantries and overhead lines - the enlarged BESS compound - the cumulative industrialisation of the area This renders the LVIA unreliable.	Application (Design Principles, Parameters and Commitments [APP-213]) and assesses the 400kV Project Substations.
GMAG-115	Landscape and Visual	8.3.2. Missing or Inadequate Viewpoints Key viewpoints are missing, including: - residential receptors on Frith Way, Station Road and Woodrow Lane - users of the public rights of way network	ES Volume 2: Figure 7.6 Visual Receptors Plan [APP-081] presents the location of the selected view locations. ES Volume 2: Figure 7.5.1 Zone of Theoretical Visibility with View Locations [APP-070] demonstrates the relationship between the viewpoints and the anticipated visibility of the Scheme.

ID	Theme	Representation	Applicant's Response
		- views from higher ground to the east and west - views from the B1134 and local lanes - long-distance views across open farmland Several viewpoints provided are: - too distant - screened by vegetation not present year-round - taken from locations that minimise visibility - unrepresentative of actual receptor experience This results in an underestimation of visual harm.	The Applicant does not agree that key receptor groups have been omitted from the assessment. Residential receptors on Frith Way are represented by VL3/Site 1, whilst receptors on Station Road are represented by VL9/BESS and two other viewpoints located along Station Road. Woodrow Lane is represented by VL7/Site 1) although this viewpoint was selected to represent publicly accessible views rather than views from individual residential properties. The majority of selected viewpoints are located on Public Rights of Way and are representative of recreational users within the wider study area. The B1134 forms part of Station Road, from which three view locations have been selected. Medium and long-distance views across the open farmland landscape are represented by viewpoints VL5 to VL9 associated with Site 1 to the north and west. Furthermore, the ZTV indicates limited theoretical visibility from ground to the east of the site, reflecting the influence of topography and intervening vegetation. View location selection was informed by desk-based analysis, field survey work, stakeholder consultation and the ZTV analysis, in accordance with the principles of GLVIA3. The selected view locations were chosen to represent a range of receptor types, viewing directions,

ID	Theme	Representation	Applicant's Response
			distances and levels of visibility, rather than individual properties or every possible view. The visual assessment considers both summer and winter conditions. The winter scenario specifically considers conditions when deciduous vegetation is not in leaf and therefore represents a reasonable worst-case scenario for visibility.
GMAG-116	Landscape and Visual	8.3.3. Underestimation of Substation and BESS Massing The LVIA does not accurately represent: - the height of 400kV gantries - the bulk of transformers and switchgear - the scale of the BESS compound - the cumulative massing of two substations side-by-side - the industrial character of fencing, lighting and access roads The Great Moulton and Tivetshall St Margaret infrastructure cluster would form a dominant industrial complex in a rural landscape.	The LVIA presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] considers the maximum Scheme parameters submitted as part of the Application. Maximum parameters are then secured in Design Principles, Parameters and Commitments [APP-213] which are secured through requirement 5 of the Draft DCO [AS-032].

ID	Theme	Representation	Applicant's Response
GMAG-117	Landscape and Visual Lighting	8.3.4 No Night-Time Assessment The ES does not assess: - operational lighting - security lighting - BESS lighting - substation maintenance lighting - skyglow - light spill onto hedgerows, fields and residential properties This is a major omission, particularly given the area's dark-sky baseline.	A Lighting Strategy within ES Volume 3, Appendix 7.11 – S Volume 3, Appendix 7.11 – Lighting Strategy [APP-151] identifies national and local planning policy, guidance and standards as relevant to artificial lighting for the Scheme. It determines the existing lighting conditions within the Order Limits and surrounding area, and establishes the ecological, human, landscape and visual receptors likely to be affected by new artificial lighting introduced by the Scheme. Finally, it establishes principles within the lighting mitigation strategy for the Scheme to minimise obtrusive light from construction, operation and decommissioning phases of the Scheme with due regard to illuminance levels established by industry guidance. The Lighting Strategy aims to ensure that external lighting for the Scheme is designed to provide a safe working environment while avoiding unnecessary light pollution and reducing potential effects on the key receptors. The objective is to minimise adverse effects as far as practicable, while meeting essential safety and security requirements of the Scheme. The Lighting Strategy concludes the Application Site falls within an E2 'Rural' Environmental Lighting Zone and that lighting required for the Scheme is limited and measures such as motion sensor, lighting controls, lower colour temperatures and luminaire orientation will

ID	Theme	Representation	Applicant's Response
			be utilised to avoid nuisance and minimise and negate impacts as far as possible. Measures are secured in the Outline CEMP [APP-196] and Outline OEMP [APP-197]. The Applicant considers this approach reduces the potential for significant landscape and visual effects from lighting to occur. The LVIA presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] does not therefore consider the effects of lighting.
GMAG-118	Landscape and Visual Construction	8.3.5 No Assessment of Construction Landscape Impacts Construction will involve • cranes • heavy plant • large compounds • soil storage • haul roads • lighting • dust and disturbance These impacts have not been assessed.	The Applicant disagrees that the construction effect on landscape is not assessed. In section 7.8 of ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], assessment of likely effects during construction phase are considered.
GMAG-119	Landscape and Visual	8.3.6 Misclassification of Construction Duration in the ES	The Applicant acknowledge that construction duration will be 18-24 months. As detailed within Chapter 2, for purposes of the assessment, the construction phase

ID	Theme	Representation	Applicant's Response
	Construction	The ES repeatedly classifies construction-phase landscape, visual, lighting and traffic effects as “short-term”. This is factually incorrect and inconsistent with the Applicant's own construction programme, which confirms that the National Grid Substation, Project Substation, BESS compound and associated within the Great Moulton, Tivetshall St Margaret and Wacton cluster infrastructure will be under construction for 18–24 months. A construction period of this duration cannot be described as short-term under GLVIA3, NPS EN-1, NPS EN-3, NPS EN-5 or standard EIA practice, where short-term effects are typically defined as lasting days to weeks, and effects lasting more than one year are categorised as medium-term. By misclassifying a two-year construction programme as “short-term”, the ES artificially reduces the assessed significance of: • construction cranes, plant and compounds • haul roads and soil storage	effects may result from activities during site preparation, enabling works and also construction and commissioning activities. This covers sources of effects such as construction traffic, construction activity noise and vibration, dust generation, site runoff, mud on roads, risk of fuel and oil spillage and the visual intrusion of plant and machinery on Site. The duration of construction-related effects will be different for different activities. For example, impacts related to earth moving are likely to be short in duration compared with the construction of energy infrastructure or landscaping activities. Within the Landscape and Visual assessment this is considered short term (between 1-5 years) within ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. Neither GLVIA3 nor the National Policy Statements prescribe fixed temporal thresholds for defining short, medium or long-term effects.

ID	Theme	Representation	Applicant's Response
		• construction lighting • HGV movements and construction traffic • visual intrusion from tall construction equipment • loss of tranquillity and rural character • construction-phase effects on heritage setting • cumulative construction impacts across the Great Moulton, Tivetshall St Margaret C Wacton cluster This misclassification suppresses the true scale of harm and results in an unlawful in-combination effects assessment under Regulation 5(2) and Schedule 4 of the EIA Regulations. The Examining Authority cannot rely on the ES's conclusions regarding construction-phase landscape or visual effects, nor the combined effects of construction activity on residents, PRow users or heritage receptors.	
GMAG-120	Landscape and Visual	8.3.7. Fundamental Errors in the Applicant's LVIA for Sites 1, 2, the BESS and the 400kV Substation	The Applicant does not agree with this position. Magnitude of change is based on consideration of the size/scale, geographical influence, duration and reversibility, as described above, is combined with

ID	Theme	Representation	Applicant's Response
		GMAG has undertaken a detailed review of the Applicant's Landscape and Visual Impact Assessment (LVIA) as it relates specifically to Site 1, Site 2, the BESS compound and the 400kV National Grid substation. These components form the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster and represent the most visually and physically intrusive elements of the entire scheme. The LVIA submitted by the Applicant contains fundamental methodological weaknesses, internal inconsistencies and omissions that materially understate the scale and significance of harm. (1). Magnitude of Change Systematically Down-Rated Across Sites 1 and 2 and the BESS/NG substation, the LVIA repeatedly applies Moderate or even Slight magnitudes of change in situations where its own narrative describes "complete change to views", "dominant visual change", or "clearly noticeable visual change". For example, the ES states that receptors at the settlement edge of Great Moulton would experience:	professional judgement and good practice guidance to determine the likely magnitude of change that will occur to visual receptors. ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118] details the methodology. The Applicant notes the respondent's assertion that the LVIA applies moderate or slight magnitudes of change where the assessment narrative refers to a "complete change to views", "dominant visual change" or "clearly noticeable visual change". However, no specific examples have been identified which demonstrate an inconsistency between the narrative assessment and the magnitude of change upon review.

ID	Theme	Representation	Applicant's Response
		"a complete change to views as a result of the National Grid Substation and Project Substation." Under GLVIA3, a "complete change" affecting high-sensitivity residential receptors should be assessed as High/Major magnitude, not Moderate. This down-rating artificially suppresses the level of significance and is inconsistent with accepted LVIA practice.	
GMAG-121	Landscape and Visual	(2). Embedded Mitigation Used to Mask True Effects The LVIA repeatedly assesses effects "taking into account embedded mitigation", including planting that does not yet exist and will not provide meaningful screening for many years. GLVIA3 requires that: - the unmitigated effects are assessed first - mitigation is then considered transparently Instead, the Applicant blends mitigation into the baseline, resulting in an underestimation of Year 1 and Year 15	The Applicant does not agree with this position. The LVIA methodology is set out in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]. In accordance with the methodology and GLVIA3 embedded mitigation form an integral part of the Scheme and its design and are assessed through the EIA process. This includes exclusion of development from parts of the draft Order Limits, application of offsets from features and receptors, and introduction of landscape measures such as planting. The Applicant does not agree that landscape planting has been treated as part of the baseline. The baseline conditions are defined separately within the ES, and the assessment of effects is undertaken against those existing conditions.

ID	Theme	Representation	Applicant's Response
		effects, particularly around the BESS and Site 1 where the infrastructure is tall, industrial and visually dominant.	The ES Volume 1, Chapter 7: Landscape and Visual Effects [APP-043] reports effects at multiple assessment stages, including the operational year 1 in which the development becomes operational and operational year 15 when mitigation planting is expected to have established. This approach enables understanding of how effects may evolve over time.
GMAG-122	Landscape and Visual	(3). Failure to Properly Assess Residential Visual Amenity The LVIA acknowledges Major or Major-to-Substantial significant effects for: BESS VL9 – Station Road property Site 1 VL3 – settlement edge of Great Moulton Yet the Applicant does not undertake a Residential Visual Amenity Assessment (RVAA) or apply the TGN 02/19 test of whether the development would result in an “unacceptable overbearing effect” on residential living conditions. This is a serious omission given the scale of the substations and the proximity of homes.	The Applicant has prepared a Residential Visual Amenity Assessment (RVAA), as presented in ES Volume 2, Appendix 7.8 [APP-148]. The RVAA has been undertaken in accordance with the Landscape Institute's Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (2019). The purpose of an RVAA is not to identify all properties from which the development may be visible, nor to assess general visual effects experienced by residents. Rather, it is intended to determine whether the scale and proximity of a development would result in residential visual amenity being affected to such an extent that the property would become an unattractive place in which to live, through effects described as visually overbearing, overwhelming or oppressive. Whilst the Applicant acknowledges that significant visual effects have been identified at BESS VL9 (representative of properties on Station Road adjacent to the BESS) and Site 1 VL3 (the settlement edge of Great Moulton in relation to Site 1) during Operation

ID	Theme	Representation	Applicant's Response
			Year 1, significant visual effects do not automatically equate to effects that would meet the RVAA threshold set out in TGN 02/19. The Applicant's RVAA adopted a 100m study area from the Scheme element parameters, reflecting the proximity within which visually overbearing, overwhelming or oppressive effects are most likely to occur. The properties referred to above fall outside this study area and were therefore scoped out of the RVAA on the basis of distance. The assessment concluded that no residential properties within the defined study area would experience visual effects of such magnitude that they would become unattractive places in which to live. The absence of any effects meeting the RVAA threshold within the 100m study area, where such effects would be most likely to occur, further demonstrates that the study area was appropriately defined and provides confidence that properties located at greater distances would not experience the visually overbearing, overwhelming or oppressive effects required to trigger an unacceptable impact on residential visual amenity.
GMAG-123	Landscape and Visual	(4). Underassessment of PRow Amenity and Tranquillity	The LVIA methodology is set out in ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118], in accordance with GLVIA3 and best practice.

ID	Theme	Representation	Applicant's Response
	Public Rights of Way	The LVIA acknowledges that PRoW users will experience: “clearly noticeable visual change” “dominant visual change” “loss of tranquillity and remoteness” Yet it still assigns Medium sensitivity to several PRoW despite their rural, tranquil and recreational character. It also fails to assess: • sequential views along PRoW • the experiential quality of walking through an industrialised corridor • the cumulative effect of two substations, a BESS and overhead lines • the impact on promoted routes such as Boudicca Way and Via Beata This results in a materially understated assessment of harm to public amenity.	The references in the LVIA to “clearly noticeable visual change”, “dominant visual change” and a “loss of tranquillity and remoteness” relate to the magnitude of the effects experienced by users, rather than sensitivity. These are separate components of the assessment and should not be conflated. ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149] has considered the visual amenity effect on the PRoW as a receptor including sequential effects, with affected length of PRoW and direction of travel considered where required. In addition, multiple View Locations including from the PRoW network have been assessed as detailed in ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]. This includes views from the Boudicca Way and Great Moulton FP19. The Applicant disagrees that the LVIA fails to address sequential views, experiential quality, combined effect of the Scheme's substations, BESS and overhead lines and effect on promoted routes. Furthermore the experiential quality of walking through the landscape is considered as a perceptual quality in the landscape assessment within the LVIA and ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120]. The respondent is conflating cumulative effects with the assessment of the combined effects of various Scheme

ID	Theme	Representation	Applicant's Response
			components. The assessment has considered the Scheme as a whole, including the National Grid Substation, the 400kV substation, the BESS, overhead line diversions and all associated infrastructure. These elements have not been assessed in isolation or omitted from either the landscape or visual assessment. Their combined influence is reflected within the reported effects and significance conclusions.
GMAG-124	Landscape and Visual	(5). Landscape Character Effects Underplayed The LVIA concedes that the BESS and Site 1 would cause: “a total change to the key characteristics of these Sites” and that Site 8 and parts of LCA E2 would experience Major or Moderate significant effects. However, it fails to acknowledge that the Great Moulton, Tivetshall St Margaret and Wacton cluster as a whole (NG substation + project substation + BESS + gantries + overhead lines) would create a new industrial landscape unit entirely at odds with the existing rural plateau. The Applicant treats each site in isolation, avoiding the obvious conclusion that the combined massing constitutes a	The Applicant disagrees that the LVIA fails to acknowledge the effect of the Scheme's National Grid Substation, Project Substation, the BESS, gantries and overhead lines. Detail assessment of the Landscape is presented in Appendix 7.3 - Landscape Assessment Tables [APP-120]. The Applicant also disagrees that the Scheme would create a new industrial landscape that is wholly at odds with the existing rural plateau character. The Applicant acknowledges that the introduction of energy infrastructure would result in a change in land use and that key characteristics of Site 1, the BESS Site at a local level and the district character of LCA E2 would be altered. These effects have been transparently assessed and reported within the LVIA, including the identification of significant effects where appropriate. However, the Applicant does not agree that the presence of energy generation and transmission

ID	Theme	Representation	Applicant's Response
		fundamental transformation of landscape character.	infrastructure necessarily equates to the creation of an industrial landscape. Furthermore, Site 1 is located adjacent to a railway line and rural road network, energy infrastructure is already present as existing 400KV OHL and its pylon towers are located within Site 1, the Scheme would be experienced within this existing context. The Applicant also rejects the suggestion that individual elements of the Scheme have been assessed in isolation. The conclusions presented within the LVIA are based on an assessment of the Scheme as a whole and reflect the combined influence of the various Scheme components on landscape and visual receptors.
GMAG-125	Landscape and Visual Cumulative impact	(6). Cumulative Assessment is Inadequate and Misleading The LVIA's cumulative assessment: - excludes construction and decommissioning phases - dismisses cumulative effects in LCA E2 despite acknowledging another solar scheme (2024/3817) - asserts "no cumulative effects" for Great Moulton and Wacton without mapping or photomontage evidence	The respondent is conflating cumulative effects with the assessment of the combined effects of various Scheme components, which the Applicant has already addressed in GMAG-123 and 124. A detailed landscape and visual assessment are reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The LVIA did not exclude construction and decommissioning phases. Cumulative Scheme (2024/3817) was considered, and it was concluded that it would result in a medium scale increase in solar development within the LCA in combination with the Scheme, given its proximity to the

ID	Theme	Representation	Applicant's Response
		ignores the combined visual dominance of two substations, a BESS and overhead lines This is contrary to the EIA Regulations, which require a full assessment of combined, successive and simultaneous effects.	Scheme it is considered this would not result in an increase to the reported effects assessed across the wider LCA. The Applicant is aware of other projects in the region. The ES [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES Volume 2, Figure 2.1 - Cumulative Developments [APP-058] presents the location of cumulative developments.
GMAG-126	Landscape and Visual Public Rights of Way	(7). Inconsistent Treatment of Sensitivity The LVIA inconsistently applies sensitivity ratings: - High sensitivity for some residential receptors but not others - Medium sensitivity for PRow that clearly warrant High - Medium sensitivity for rural lanes despite their scenic and recreational value This selective downgrading reduces the predicted significance of effects.	The LVIA methodology is set out in ES Volume 3, Appendix 7.1 Landscape and Visual Methodology [APP-118] and has been prepared in accordance with GLVIA3 and established best practice. The sensitivity of a visual receptor is based on professional judgement and informed by the combination of the identified value and susceptibility criteria. The Applicant does not agree that sensitivity ratings have been applied inconsistently or selectively to reduce the significance of effects. Receptor sensitivities have been assessed on a case-by-case basis using the same methodology throughout the LVIA.

ID	Theme	Representation	Applicant's Response
GMAG-127	Landscape and Visual	(8). Lack of Transparency and Methodological Clarity Key methodological weaknesses include: • no clear explanation of how magnitude judgements were reached • no justification for downgrading effects at Year 15 • no evidence that planting can screen 400kV infrastructure • no assessment of night-time lighting • no assessment of the industrial character of fencing, access roads and security infrastructure These omissions undermine the reliability of the LVIA.	The LVIA methodology is set out in ES Volume 3, Appendix 7.1 Landscape and Visual Methodology [APP-118] and has been prepared in accordance with GLVIA3 and established best practice. Magnitude of effects: The methodology clearly explains that magnitude of effects is determined through consideration of the size/scale of change, geographical extent, duration and reversibility. These factors are combined using professional judgement to determine the magnitude of change experienced by each receptor. Assessment at Year 15: The assessment of effects at Year 15 reflects the establishment and maturation of the proposed landscape mitigation. As explained within the LVIA, this provides additional visual screening and greater integration of the Scheme within the surrounding landscape. Screening of 400kV infrastructure: The Applicant acknowledges that landscape planting will not completely screen all Scheme components. The LVIA does not assume complete screening and the residual effects associated with those elements are clearly identified and assessed within the LVIA. Night-time effects: The assessment of lighting effects is addressed in GMAG-117.

ID	Theme	Representation	Applicant's Response
			Ancillary infrastructure: The effects of fencing, access tracks, security infrastructure and other ancillary components are considered as part of the overall assessment presented in Chapter 7. Detailed receptor-specific assessments are provided within ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120], and ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-147]. The LVIA therefore considers the effects arising from the Scheme as a whole, including ancillary infrastructure, and does not assess these elements in isolation. The Applicant does not agree that there is a lack of transparency or methodological clarity within the LVIA, nor that the assessment contains omissions that undermine its reliability.
GMAG-128	Landscape and Visual	Planning Weight: The LVIA submitted by the Applicant cannot be relied upon as an accurate or conservative assessment of landscape or visual harm for Sites 1, 2, the BESS or the 400kV National Grid substation. The assessment contains: • methodological errors • inconsistent sensitivity ratings • magnitude down-rating	The Applicant does not agree that the LVIA understates the scale, extent and significant of harm. Reasons are previously discussed in GMAG-112 to GMAG-127.

ID	Theme	Representation	Applicant's Response
		• inadequate PRow and residential assessment • incomplete cumulative analysis • unjustified reliance on future planting • failure to assess the true industrialisation of the Great Moulton, Tivetshall St Margaret and Wacton cluster As a result, the LVIA materially understates the scale, extent and significance of harm. The Examining Authority should attach very limited weight to the Applicant's LVIA and rely instead on a precautionary interpretation of the evidence.	
GMAG-129	Landscape and Visual Lighting	8.3.8 Omission of Lighting Assessment (Major LVIA Failure) The Applicant has failed to assess night-time lighting impacts within the LVIA, despite lighting being an integral component of visual and landscape effects under GLVIA3, NPS EN-1 and NPS EN-3. Even if lighting is discussed elsewhere in the ES, this does not remove the requirement for the LVIA to assess the visual consequences of	The Applicant refers to its response to GMAG-117.

ID	Theme	Representation	Applicant's Response
		lighting on landscape character, visual receptors, tranquillity, dark skies and heritage settings. The LVIA contains no assessment of: - operational lighting at the 400kV National Grid substation - operational lighting at the project substation - BESS compound lighting - security lighting and motion-activated lighting - access road lighting - maintenance and emergency lighting - skyglow, light spill or glare - night-time visibility of gantries, fencing and infrastructure - cumulative night-time lighting from the Great Moulton, Tivetshall St Margaret and Wacton cluster This omission is particularly serious given the rural baseline, which is characterised by dark skies, low ambient lighting and high tranquillity. The introduction of two substations, a	

ID	Theme	Representation	Applicant's Response
		BESS compound and associated security infrastructure would create a permanent night-time industrial glow, fundamentally altering the character of the area.	
GMAG-130	Landscape and Visual Lighting	The LVIA also fails to assess: • night-time effects on residential receptors • night-time effects on PRow users • night-time effects on heritage settings • night-time effects on wildlife, including bats • night-time cumulative effects with other infrastructure NPS EN-1 (5.9.8) requires assessment of night-time visual effects, lighting and skyglow. NPS EN-3 requires assessment of lighting impacts from solar and BESS infrastructure. GLVIA3 requires assessment of night-time visibility and lighting where relevant. The EIA Regulations require assessment of all likely significant	In addition to the response provided in GMAG-117, the Applicant does not consider that significant visual effects arising from lighting would occur for individual visual receptors, including residential receptors and users of Public Rights of Way. The ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151], together with the measures secured through the Outline CEMP [APP-196] and Outline OEMP [APP-197], minimises the potential for lighting effects associated with the Scheme. As significant effects from lighting are not anticipated at the individual receptor level, the Applicant does not consider there to be a realistic potential for significant cumulative effects arising from lighting. The Applicant considers that a detailed night-time assessment of visual effects would be disproportionate. There is no reasonable basis to conclude that significant effects relating to the loss of dark skies, impacts on tranquillity, industrialisation of the night-time environment, effects on the setting of heritage assets, or cumulative night-time effects would arise.

ID	Theme	Representation	Applicant's Response
		effects, including those occurring at night. The Applicant has not complied with any of these requirements. The absence of a night-time lighting assessment means the LVIA is procedurally incomplete and cannot be relied upon to understand the true extent of visual and landscape harm. The Examining Authority is therefore left without the information required to assess: • the loss of dark skies • the industrialisation of the night-time environment • the impact of lighting on tranquillity • the effect of lighting on the setting of heritage assets • the cumulative night-time effects of the Great Moulton, Tivetshall St Margaret and Wacton cluster This is a Regulation 14 failure and a significant deficiency in the ES. Until a full night-time lighting assessment is	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 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

ID	Theme	Representation	Applicant's Response
		provided, the LVIA carries very limited weight in the planning balance.	(i.e. horizontally oriented) in order to reduce the potential impact on light sensitive species such as bats. For further information see the Schemes ES Volume 3, Appendix 7.11 Lighting Strategy [APP151] .
GMAG-131	Landscape and Visual	8.4 Landscape Character Impacts 8.4.1. Industrialisation of a Rural Landscape The introduction of: • a 400kV substation • a second substation • a large BESS compound • overhead lines • gantries • fencing • lighting • access roads would fundamentally alter the character of the landscape from rural to industrial.	Please refer to GMAG-124 on the Applicant's response to industrialisation of rural landscape comment. The effects of the Scheme on landscape character have been assessed within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and the detailed ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032].
GMAG-132	Landscape and Visual	8.4.2 Loss of Tranquillity The scheme would introduce:	The effects of the Scheme on landscape character have been assessed within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and the detailed ES

ID	Theme	Representation	Applicant's Response
	Noise and Vibration	- noise - lighting - traffic - human activity into an area currently characterised by tranquillity.	Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]. The effects of the Scheme on noise and vibration have been assessed in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048].
GMAG-133	Landscape and Visual	8.4.3 Fragmentation of Landscape Structure The development would sever: - hedgerow networks - field patterns - rural lanes - open views The LVIA does not assess this.	The Applicant has assessed the effects of the Scheme on landscape character and its features within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and the detailed ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120]. Effects on hedgerows are identified in Appendix 1 of the Outline LEMP [APP-199]. Effects on field pattern, open views and experiential effects on rural lanes are assessed as landscape effect within the LVIA.
GMAG-134	Landscape and Visual	8.5 Visual Impacts 8.5.1 Residential Receptors Residents on: - Frith Way - Station Road - Woodrow Lane	The Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines and considers effects on visual receptors. Detailed receptor-specific assessments are provided within ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120], and ES Volume 3, Appendix 7.7 – Visual Assessment Tables [APP-

ID	Theme	Representation	Applicant's Response
		• Low Road • The Street would experience: • direct views of industrial infrastructure • loss of rural outlook • night-time lighting impacts • increased visual dominance The ES underestimates these effects.	147]. View Locations VL3/Site1, VL1/Site1, VL9/BESS, and VL4/BESS are relevant to listed road names. Furthermore, with reference to residential receptors a Residential Visual Amenity Assessment, which focusses on private views, is presented in ES Volume 3, Appendix 7.8 – Residential Visual Amenity Assessment [APP-148]. Taking a proportionate approach the assessment presented identified residential receptors within 500m of the Schemes maximum parameters, undertaking an assessment of properties within 100m. Two properties out of twenty properties within this 100m area across the full Schemes RVAA study area were found to meet the threshold for further RVAA assessment. 22 Hillcrest Court at Site 2A, and Oakdene Cottage at Site 7L. In both instances the visual effect at the properties would not reach the Residential Visual Amenity Threshold. Therefore, given the low likelihood of effects meeting the threshold, no further detailed assessment has been carried out on residential properties located beyond this 100m offset from the maximum development parameters. With relation to the road names listed, on Frith Way 1 property (ref: BESS1-1) is located on the boundary of the 100m offset. The BESS Site boundary is approximately 73 m south of the side of the property,

ID	Theme	Representation	Applicant's Response
			while Sub-Site 1B's closest boundary is approximately 90 m to the rear of the property. The nearest BESS infrastructure is approximately 200 m away, and the closest solar PV array is approximately 120 m away. The National Grid Substation site is located approximately 550 m northwest of the rear of the property. The existing tree belt to the rear of the property and other intervening vegetation, provide screening of the Scheme to the west, southwest, and northwest. As a result, views towards the solar PV arrays at Sub-Site 1B and the BESS will be largely filtered. Parts of the National Grid Substation, particularly the taller elements, may be visible above sections of the tree line from the rear of the property. No properties are located within the 100m offset on Station Road, Woodrow Lane. Low Road and The Street are remote from the Site and not within the RVAA study area. Please refer to GMAG-130 for the response to lighting.
GMAG-135	Landscape and Visual Public Rights of Way	8.5.2. Public Rights of Way Walkers using: the PRoW network around Great Moulton	The Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines and considers effects on visual receptors, including PRoW. Multiple View Locations including from the PRoW network have been assessed as detailed in ES Volume 3, Appendix 7.7 – Visual

ID	Theme	Representation	Applicant's Response
		- the footpaths linking to Aslacton and Tibenham - the circular routes around the village would experience: - significant visual intrusion - loss of rural character - industrialisation of views - lighting impacts The ES does not assess these receptors adequately. The Outline PRoWPPMP provides no assessment of amenity, tranquillity or recreational impacts on walkers, cyclists or equestrians, including those using promoted routes such as Boudicca Way and Via Beata.	Assessment Tables [APP-147]. This includes views from the PRoW network around Great Moulton. Furthermore, ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149] has considered the visual amenity effects on the PRoW as a receptor including sequential effects.
GMAG-136	Landscape and Visual	7.5.3. Road Users Users of: - the B1134 - Woodrow Lane - Station Road - Frith Way	The Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines and considers effects on visual receptors, including road users.

ID	Theme	Representation	Applicant's Response
		local rural lanes would experience substantial visual change.	
GMAG-137	Landscape and Visual	8.5.4. Long-Distance Views The elevated nature of parts of the site means the infrastructure will be visible from: - higher ground to the east - higher ground to the west - long views across open farmland These impacts are not assessed.	The Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] adopts a study area which was determined through professional judgement, taking account of the scale, nature and likely visibility of the Scheme. This is considered proportionate, and the assessment adopts a variable study area comprising 3 km from the National Grid Substation and 400 kV substations, 2 km from the solar sites and BESS, and 1 km from the cable route corridor. This approach reflects the differing scale and visibility of the Scheme components and is consistent with established LVIA practice. The Applicant acknowledges that visibility of some Scheme components, particularly the National Grid Substation and 400 kV substations, may extend beyond the defined study area in certain locations. However, visibility alone does not equate to significant visual effects. The assessment demonstrates that the magnitude of visual effects generally reduces with increasing distance from the Scheme, reflecting the diminishing scale and prominence of the development within the wider landscape context. This is evidenced by the findings of the visual assessment. For example, view locations VL5 to VL9

ID	Theme	Representation	Applicant's Response
			associated with Site 1 represent medium to long distance views towards the National Grid Substation. None of these view locations identify significant visual effects. In particular, VL8 is located close to the edge of the 3 km study area and includes views of the National Grid Substation, the tallest element of the Scheme. The assessment concludes that effects at this location are not significant, demonstrating that visual effects diminish with distance and providing confidence that significant effects are unlikely to occur at greater distances.
GMAG-138	Landscape and Visual Cultural Heritage	8.6 Heritage Impacts 8.6.1. Setting of Listed Buildings The scheme would affect the setting of: • listed farmhouses • historic barns • rural heritage assets • traditional agricultural landscapes The ES does not provide a lawful setting assessment.	The Applicant disagrees with the Consultee and considers that ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] and ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [APP-169] have been undertaken in accordance with the appropriate legislation, planning policy and professional guidelines. The methodology utilised within the above assessments was agreed with all statutory consultees at PEIR stage, including Historic England, and this includes all study areas as well as heritage receptors.
GMAG-139	Landscape and Visual Lighting	Dark Skies as a Heritage Setting Attribute ES Figure 7.4 (CPRE England's Light Pollution and Dark Skies Map)	The Applicant does not consider that significant visual effects arising from lighting would occur for individual visual receptors, including heritage assets. The ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151] , together with the measures secured through the

ID	Theme	Representation	Applicant's Response
		demonstrates that the heritage landscape around Great Moulton is characterised by very dark rural skies (0.25–1 nW/cm ² /sr). Dark skies form an important component of the setting of listed farmsteads, historic barns and the traditional rural landscape, contributing to their tranquillity, remoteness and rural character. The introduction of permanent lighting at two substations, the BESS compound and associated security infrastructure would create a night-time industrial glow entirely at odds with this historic setting. The ES contains no assessment of night-time heritage impacts, contrary to NPS EN-1, Historic England's GPA3 and The Setting of Heritage Assets, and the EIA Regulations.	Outline CEMP [APP-196] and Outline OEMP [APP-197], minimises the potential for lighting effects associated with the Scheme. As significant effects from lighting are not anticipated at the individual receptor level, the Applicant does not consider there to be a realistic potential for significant cumulative effects arising from lighting. The Applicant considers that a detailed night-time assessment of visual effects would be disproportionate. There is no reasonable basis to conclude that significant effects relating to the loss of dark skies, impacts on tranquillity, industrialisation of the night-time environment, effects on the setting of heritage assets, or cumulative night-time effects would arise.
GMAG-140	Landscape and Visual	8.6.2. Historic Landscape Character The area retains: • historic field patterns • hedgerow boundaries • traditional rural form	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] addresses potential direct impacts to historic landscape character. The historic landscape character within Site 1 and the BESS site have been classified as 20th century agricultural fields, which hold little significance. Within Site 2, Sub-Sites 2A, 2B and most of 2C have also been classified as 20th century agricultural fields; however the south-eastern corner of Sub-Site 2C includes a remnant 18th-19th century field pattern, which is of greater interest. Although there will

ID	Theme	Representation	Applicant's Response
		The introduction of industrial infrastructure would erode this character.	be temporary change from arable use to energy generation, this will be reversible and temporary in nature. Furthermore, there will be no impact from this change of use on the legibility of the field patterns, nor the historic landscape character of the area as a whole.
GMAG-141	Landscape and Visual Cultural Heritage	8.6.3. Cumulative Heritage Impacts The Great Moulton, Tivetshall St Margaret and Wacton cluster would create: • large-scale visual intrusion • loss of rural setting • industrialisation of the historic landscape The ES does not assess cumulative heritage impacts.	Cumulative impacts to cultural heritage assets have been addressed in Section 10.11 of ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] .
GMAG-142	Landscape and Visual Cumulative impact	8.7. Cumulative Landscape and Heritage Effects The Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster includes: • National Grid substation • project substation • BESS	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040] , which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore considers the effects of the Scheme as a whole rather than individual elements in isolation.

ID	Theme	Representation	Applicant's Response
		• overhead lines • access roads • fencing • lighting • Solar Panels Together, these create: • a major industrial complex • significant cumulative landscape harm • significant cumulative visual harm • significant cumulative heritage harm The ES does not assess these effects.	
GMAG-143	Landscape and Visual Policy compliance	8.8 Policy Non-Compliance The scheme does not comply with: • NPS EN-1 (landscape, visual, heritage) • NPS EN-3 (landscape and visual impacts of solar and BESS) • NPS EN-5 (overhead lines and substation siting) • EIA Regulations (baseline, cumulative effects)	The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] has been undertaken in accordance with the appropriate guidelines and policy, and that it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.

ID	Theme	Representation	Applicant's Response
		NPPF (heritage protection, landscape character) The applicant has not demonstrated that impacts have been minimised or mitigated.	
GMAG-144	Landscape and Visual	8.9. Conclusions and Planning Weight GMAG submits that the landscape, visual and heritage assessment is incomplete, outdated and not compliant with the EIA Regulations, NPS EN-1, EN-3, EN-5 or the NPPF. The LVIA does not assess the scheme as currently proposed, does not include the full 400kV infrastructure, and does not evaluate the cumulative effects of the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster. As a result, the ES does not provide the Examining Authority with the information required to understand the scale, extent or significance of landscape, visual or heritage harm. The development would: industrialise a tranquil rural landscape	The Applicant acknowledges that the Scheme will result in significant effects on certain receptors, some of which will be long term. There will be some residual significant effects following the establishment of landscape mitigation. The assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] provides a robust appraisal of the likely landscape and visual effects and has been undertaken in accordance with established industry-standard guidance. NPS EN-1 states at para 5.10.5 that '<i>Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>', and at para 5.10.13 that '<i>All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites</i>'. The Applicant acknowledges that the Scheme would introduce changes to the landscape including to the PRoW network. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse effects are demonstrably outweighed by the Scheme's benefits and needs case.

ID	Theme	Representation	Applicant's Response
		• introduce large-scale, permanent 400kV infrastructure into open countryside • create a dominant industrial complex visible from homes, PRowS and rural lanes • erode historic field patterns and rural landscape character • harm the setting of listed buildings and heritage assets • introduce night-time lighting into an area currently characterised by dark skies • generate significant cumulative effects through the colocation of substations, BESS, gantries and overhead lines These impacts are substantial, adverse and long-lasting. They cannot be mitigated to an acceptable level due to the scale, height and industrial character of the infrastructure proposed. Planning Weight: Given the magnitude of landscape and visual change, the sensitivity of the	

ID	Theme	Representation	Applicant's Response
		receptors, the failure to assess cumulative effects, and the absence of a lawful heritage setting assessment, GMAG submits that substantial negative weight must be attached to the landscape, visual and heritage impacts of the scheme. The LVIA, as submitted, does not meet the requirements of Regulation 14 and cannot lawfully support a grant of development consent. Until a complete, accurate and up-to-date assessment is provided, the applicant's landscape and heritage case carries very limited weight in the planning balance.	
GMAG-145	Noise and Vibration Lighting	Noise, Vibration and Lighting 9.1 Introduction and Summary of Concerns GMAG has significant concerns regarding the noise, vibration and lighting impacts of the proposed development. The introduction of a 400kV National Grid substation, a second project substation, and a large BESS compound will generate continuous operational noise, tonal hum, cooling fan noise, and night-time lighting that will fundamentally alter the acoustic	The assessment of operational noise is presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] . The assessment includes consideration of low-frequency noise, tonality characteristics and cumulative effects. The Applicant is unaware of which key receptors are missing, and how the ES underestimates the impacts. The assumptions and limitations of the noise and vibration assessment are presented within Section 12.4 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] . The assumptions provide a robust assessment to ensure that the impacts are not underestimated.

ID	Theme	Representation	Applicant's Response
		and visual environment of Great Moulton. The Environmental Statement (ES) significantly underestimates these impacts. Key receptors are missing, the assessment is based on outdated scheme parameters, and no modelling has been undertaken for low-frequency noise, tonal characteristics, or cumulative effects. Although a Lighting Strategy exists (ES Appendix 7.11), the ES does not assess its impacts, does not model lighting effects, and does not evaluate night-time visual, ecological or residential impacts. The ES does not comply with NPS EN-1, EN-3, EN-5, the EIA Regulations, or relevant British Standards. The scheme would result in: • continuous operational noise • tonal transformer hum • low-frequency noise propagation • night-time lighting impacts • construction noise and vibration	The operational lighting for the Scheme has been designed to be minimised in accordance with the Design Principles set out in the Design Approach Document [APP-212] and the Design Principles, Parameters and Commitments [APP-213]

ID	Theme	Representation	Applicant's Response
		cumulative noise from the Great Moulton, Tivetshall St Margaret and Wacton cluster GMAG submits that the noise and lighting assessment is incomplete, inconsistent and insufficient to support a lawful decision.	
GMAG-146	Noise and Vibration Landscape and Visual Lighting	9.2. Baseline Acoustic and Lighting Environment Great Moulton is characterised by: - low background noise levels - rural tranquillity - absence of industrial noise sources - dark skies with minimal artificial lighting - low traffic volumes - high sensitivity to change The ES does not provide a robust baseline. No long-term unattended monitoring was undertaken, and no night-time baseline data is presented.	A long-term unattended sound survey was undertaken between November 2024 and February 2025 at a total of 51 measurement locations across the Scheme, at locations representative of the nearest noise sensitive receptors. The measurement locations and results, which include night-time sound levels, are presented in ES Volume 3, Appendix 12.1 - Baseline Sound Survey Report [APP-178]. The operational lighting for the Scheme has been designed to be minimised in accordance with the Design Principles set out in the Design Approach Document [APP-212] and the Design Principles, Parameters and Commitments [APP-213]

ID	Theme	Representation	Applicant's Response
GMAG-147	Noise and Vibration Scheme Description	9.3. Deficiencies in the Applicant's Noise Assessment 9.3.1. Assessment Based on Outdated Scheme Parameters The noise assessment appears to pre-date the escalation to a 400kV National Grid substation. As a result, it does not reflect: • the true number of transformers • the size and type of cooling systems • the tonal characteristics of 400kV equipment • the increased number of fans, pumps and switchgear • the enlarged BESS compound and its cooling systems This renders the assessment unreliable.	The assessment of operational noise, which includes assessment of the 400 kV substation is presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The National Grid substation does not incorporate transformers. However, transformers are proposed elsewhere as part of the Scheme. The number of transformers used within the assessment is reflective of the proposed number of transformers. Cooling systems associated with transformers form part of the transformer noise specification, and therefore these are considered within the assessment. Tonality associated with 400kV equipment (and other equipment) is considered within the assessment, although the assessment demonstrates that tonality would be masked at noise sensitive receptors. The assessment considers a worst-case example BESS layout, inclusive of cooling systems. On that basis, the assessment is considered to be robust. The assessment of operational noise concludes that the Scheme would not result in significant effects.
GMAG-148	Noise and Vibration	9.3.2. No Low-Frequency Noise Assessment 400kV transformers produce:	The assessment of low frequency noise is presented in Section 12.8 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048].

ID	Theme	Representation	Applicant's Response
		- low-frequency hum - tonal components - long-distance propagation Low-frequency noise can travel further, penetrate buildings more easily, and cause: - sleep disturbance - vibration perception - annoyance - health impacts The ES does not assess low-frequency noise at all.	The results of the low frequency noise assessment indicate that calculated sound levels at the worst-case high sensitivity receptors are below the low frequency spectral criteria outlined within NANR45. The assessment therefore requires no modification to the outcome of significance.
GMAG-149	Noise and Vibration	9.3.3. No Tonal Noise Assessment British Standard BS 4142 requires tonal penalties to be applied where noise contains: - hum - whine - buzz - cyclic tones	The assessment of operational noise is presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Further information relating to calculations and modelling is provided in ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179]. BS 4142 requires acoustic feature corrections to be considered at the receptor location, rather than at the source location. High voltage transformers can generate a 100Hz hum due to vibration of the transformer coil. The acoustic modelling exercise indicates that the specific sound level from the high voltage transformers, including the

ID	Theme	Representation	Applicant's Response
		400kV transformers and BESS cooling systems produce tonal noise. The ES does not apply tonal corrections, resulting in an underestimation of impact.	100Hz tone, is unlikely to be distinguishable at receptors as it will be masked by other broadband sound relating to the inverters and BESS Containers. Therefore, no rating penalty has been applied for tonality.
GMAG-150	Noise and Vibration	9.3.4. No Cumulative Noise Assessment The Great Moulton, Tivetshall St Margaret and Wacton cluster includes: • National Grid substation • project substation • BESS • overhead line conductors • cooling systems • fans and pumps The ES does not assess cumulative noise from these combined sources.	The results presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] consider the cumulative rating levels from all equipment in operation. The assessment concludes no significant effects from operational noise.
GMAG-151	Noise and Vibration EIA Methodology	9.3.5. Missing Receptors The ES omits key receptors, including: • Frith Way • Station Road	The noise sensitive receptors considered within the assessment are presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] and ES Volume 2, Figure 12.2 - Noise and Vibration Sensitive Receptors [APP-099].

ID	Theme	Representation	Applicant's Response
		• Woodrow Lane • Low Road • The Street These properties are closest to the Great Moulton, Tivetshall St Margaret and Wacton cluster and will experience the greatest impacts.	NSR2A and NSR2B are noted to be situated on Frith Way. NSR3A and 3B are noted to be situated on Station Road. NSR5A and NSR5B are situated approximately 500 m south-east of dwellings along Woodrow Lane and are nearer to the Scheme. The impacts and effects at properties along Woodrow Lane are expected to be lower than those presented for NSR5A and NSR5B as they are nearer to the Scheme. There are three roads known as Low Road around the Scheme. In all cases, these fall outside of the study area. There are eight roads known as The Street around the Scheme. If the Interested Party is referring to receptors in Tharston, NSR24 is noted to be approximately 500 m closer to the Scheme than receptors along The Street. The impacts and effects at these receptors are expected to be lower than those presented for NSR24. If the Interested Party is referring to receptors south of Hempnall, NSR32 is noted to be on The Street. If the Interested Party is referring to another location, please advise the Applicant so that this can be considered in further detail.

ID	Theme	Representation	Applicant's Response
GMAG-152	Noise and Vibration	9.3.6 No Night-Time Assessment Night-time noise limits are lower due to increased sensitivity. The ES does not provide: • night-time baseline data • night-time modelling • assessment of sleep disturbance This is a major omission.	A long-term unattended sound survey was undertaken between November 2024 and February 2025 at a total of 51 measurement locations across the Scheme at locations representative of the nearest noise sensitive receptors. The measurement locations and results, which include night-time sound levels, are presented in ES Volume 3, Appendix 12.1 - Baseline Sound Survey Report [APP-178]. The results of noise modelling during the night-time (23:00-04:00) and early morning (04:00 – 07:00) periods are presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The assessment of operational noise uses industry standard guidance comprising BS 4142:2014+A1:2019 and NANR45. BS 4142:2014+A1:2019 explicitly excludes assessment of indoor noise levels, which would be used to assess sleep distance. However, it is expected that assessments which conclude a 'low impact', or are below the LOAEL are not expected to have a negative impact on sleep distance.
GMAG-153	Noise and Vibration	6.3.7. Fundamental Errors in the Applicant's Noise Assessment (Evidence from ES Chapter 12) A detailed review of ES Chapter 12 (Noise and Vibration) reveals multiple omissions, inconsistencies and methodological weaknesses that	As noted in response to GMAG-152, night-time baseline data is provided, and operational noise during night-time periods is assessed. Night-time baseline data is presented in ES Volume 3, Appendix 12.1 - Baseline Sound Survey Report [APP-178]. Night-time results of operational noise levels are presented within ES

ID	Theme	Representation	Applicant's Response
		materially undermine the reliability of the Applicant's assessment. These issues directly support GMAG's position that the ES does not provide the Examining Authority with the information required to understand the likely significant noise effects of the Scheme. (1). No Night-Time Baseline Data Provided Despite the rural, low-noise context of Great Moulton, the ES presents no night-time baseline measurements. Table 12-17 only reports "ambient and typical background sound levels" for daytime periods, with no data for the period when receptors are most sensitive. This omission is contrary to: • BS 4142 (which requires assessment during the most sensitive periods) • BS 8233 (night-time internal noise limits)	Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179]. To provide assessment context, BS 8233:2014 is mentioned in paragraph 12.8.52 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] when referencing night-time noise outcomes at NSR3B, which is the receptor identified with the highest impact.

ID	Theme	Representation	Applicant's Response
		NPS EN-1 (which requires assessment of night-time effects) Without night-time baseline data, the ES cannot lawfully assess sleep disturbance or night-time operational noise.	
GMAG-154	Noise and Vibration	(2). Monitoring Locations Do Not Represent the Closest Receptors Figure 12.1 and Table 12-16 show that noise monitoring locations were placed away from the receptors closest to the Great Moulton, Tivetshall St Margaret and Wacton cluster, including: - Frith Way - Station Road - Woodrow Lane - Low Road These properties are the most exposed to transformer hum, BESS cooling noise and construction traffic, yet the ES does not provide baseline data for them. The ES claims monitoring locations are “representative of all receptors in the ZOI”, but this is demonstrably incorrect.	Please refer to response for GMAG-151. The Applicant has undertaken measurements at locations considered representative of the nearest noise sensitive receptors to the Scheme. For Frith Way, measurement location MP43 is approximately 160 m away from NSR2B, and is considered to be representative. For Station Road, measurement location MP41 is at the property boundary of NSR3A. For Woodrow Lane, measurement location MP42 is considered to be representative of NSR5B, being located approximately 250 m south of the receptor. Woodrow Lane is approximately 500 m further away from the Proposed Scheme than NSR5B. There are three roads known as Low Street around the Scheme. In all cases, these fall outside of the study area. The measurement locations are considered representative of the associated noise sensitive

ID	Theme	Representation	Applicant's Response
			receptors as listed in Table 12-16 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] .
GMAG-155	Noise and Vibration	(3). No Low-Frequency Noise Assessment The ES contains no octave-band or 1/3-octave analysis, despite 400kV transformers being known sources of: • low-frequency hum • tonal components • long-distance propagation Table 12-21 provides only broadband sound power levels, which cannot be used to assess low-frequency noise. This is a major omission given the rural context and the known health and amenity impacts of low-frequency noise.	An assessment of low frequency noise is presented in Section 12.8 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] . Details of the results are presented in ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179] .
GMAG-156	Noise and Vibration	(4). No Tonal Penalties Applied Under BS 4142 Although the ES cites BS 4142 as a methodology (Section 12.3.7), it does not apply any rating penalties for: • tonal hum	The assessment of operational noise is presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] . Further information relating to calculations and modelling is provided in ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179] .

ID	Theme	Representation	Applicant's Response
		• whine • buzz • intermittency • impulsive characteristics 400kV transformers and BESS cooling systems are well-established tonal sources. Failure to apply the required +6 dB tonal penalty results in a significant underestimation of operational noise impacts.	BS 4142 requires acoustic feature corrections to be considered at the receptor location, rather than at the source location. High voltage transformers can generate a 100Hz hum due to vibration of the transformer coil. The acoustic modelling exercise indicates that the specific sound level from the high voltage transformers, including the 100Hz tone, is unlikely to be distinguishable at the receptor as it will be masked by other broadband sound relating to the inverters and BESS Containers. Therefore, no rating penalty has been applied for tonality.
GMAG-157	Noise and Vibration	(5). No Cumulative Noise Assessment for the Great Moulton, Tivetshall St Margaret and Wacton Cluster Section 12.11 claims to provide a cumulative assessment, but it only considers other developments, not the combined noise from: • the National Grid substation • the project substation • the BESS compound • overhead line conductors • cooling systems	The results presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] consider the cumulative rating levels from all equipment in operation.

ID	Theme	Representation	Applicant's Response
		• fans and pumps This is a fundamental error. The Great Moulton, Tivetshall St Margaret and Wacton cluster is the dominant noise source, yet its cumulative effects are not assessed.	
GMAG-158	Noise and Vibration	(6). Construction Vibration and Traffic Noise Dismissed Without Evidence The ES states that vibration from traffic was “screened out” based on assumptions in the PEIR, yet: • no vibration measurements were taken • no modelling was undertaken • no assessment of HGVs on rural lanes was provided • no assessment of piling or heavy plant vibration was included This contradicts the Scoping Opinion, which required evidence to justify scoping out vibration impacts.	An assessment of construction traffic vibration is presented in Section 12.8 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Baseline vibration levels are not considered to be relevant or necessary, and have therefore not been undertaken. This is because the assessment of construction vibration is based on the peak particle velocity, which considers the peak level of vibration, and is not a cumulative parameter. A review of available literature has been undertaken, which has been used to establish the impacts and effects outlined within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The assessment includes consideration of abnormal loads and identifies two properties in Saxlingham Nethergate which are within 5 m of the road edge (The Old School and Manor Farmhouse). Based on the data obtained at ATC6 and ATC7 as reported within ES Volume 1, Chapter 11 - Transport and Access [APP-047], a number of rigid vehicles with four or more axles or articulated lorries passed along The Street and Broaden Lane during the

ID	Theme	Representation	Applicant's Response
			traffic survey. Properties which front these roads are therefore already likely to be exposed to comparable levels of vibration which would be generated by abnormal loads required for the Scheme.
GMAG-159	Noise and Vibration	(7). No Assessment of Night-Time Operational Noise The ES provides no night-time modelling, despite night-time being the most sensitive period for: • sleep disturbance • low-frequency hum • tonal noise perception This omission is contrary to NPS EN-1, BS 4142 and BS 8233.	The measurement locations and results, which include night-time sound levels, are presented in ES Volume 3, Appendix 12.1 - Baseline Sound Survey Report [APP-178]. The results of noise modelling during the night-time (23:00-04:00) and early morning (04:00 – 07:00) periods are presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The assessment of operational noise uses industry standard guidance comprising BS 4142:2014+A1:2019 and NANR45. BS 4142:2014+A1:2019 explicitly excludes assessment of indoor noise levels, which would be used to assess sleep distance. However, it is expected that assessments which conclude a 'low impact', or are below the LOAEL are not expected to have a negative impact on sleep distance.
GMAG-160	Lighting	(8). Lighting Strategy Exists but Its Impacts Are Not Assessed Natural England explicitly reminded the Applicant that the ES must assess:	The operational lighting for the Scheme has been designed to be minimised in accordance with the Design Principles set out in the Design Approach Document [APP-212] and the Design Principles, Parameters and Commitments [APP-213].

ID	Theme	Representation	Applicant's Response
		“noise, vibration, light, heat, radiation etc. resulting from the operation of the proposed development.” Although a Lighting Strategy has been submitted (ES Appendix 7.11), the ES does not assess it. There is • no lighting modelling • no lux contour plots • no assessment of light spill no assessment of skyglow • no assessment of effects on residential receptors • no assessment of effects on dark-sky landscapes • no assessment of effects on bats or nocturnal ecology • no assessment of night-time visual impacts • no cumulative lighting assessment The Lighting Strategy confirms that all substations and the BESS will require operational lighting, yet the ES provides no evaluation of the resulting impacts. This failure to assess the lighting	

ID	Theme	Representation	Applicant's Response
		proposals contained in Appendix 7.11 represents a clear breach of the EIA Regulations and NPS EN-1, EN-3 and EN-5.	
GMAG-161	Noise and Vibration	Planning Weight: The evidence contained within ES Chapter 12 demonstrates that the Applicant's noise and vibration assessment is incomplete, inconsistent and methodologically unsound. The absence of night-time baseline data, the failure to assess low-frequency and tonal noise, the omission of key receptors, and the lack of any cumulative assessment for the Great Moulton, Tivetshall St Margaret and Wacton cluster mean that the ES does not provide a reliable basis for understanding the likely significant effects of the Scheme. These omissions represent a Regulation 14 failure and materially reduce the weight that can be attached to the Applicant's conclusions. Until a complete, transparent and regulation-compliant	The Applicant addressed this comment with regards to noise and vibration in GMAC-149-159.

ID	Theme	Representation	Applicant's Response
		assessment is provided, the Applicant's noise case carries very limited weight in the planning balance.	
GMAG-162	Noise and Vibration	9.4. Construction Noise and Vibration Construction will involve: • piling • excavation • heavy plant • HGV movements • cranes • concrete pouring • cable trenching These activities will generate: • high noise levels • ground vibration • traffic noise • intermittent peaks The ES does not assess: • vibration impacts • construction traffic noise	Construction vibration and construction traffic is assessed within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] . The assessment of construction activity has been undertaken based on industry standard guidance and assessment criteria provided within BS 5228-1:2009+A1:2014.

ID	Theme	Representation	Applicant's Response
		• cumulative construction impacts • impacts on residential amenity	
GMAG-163	Noise and Vibration	9.5. Misclassification of Construction Duration in the ES The Environmental Statement (ES) repeatedly classifies construction-phase noise, vibration, lighting and traffic effects as “short-term”. This is factually incorrect and inconsistent with the Applicant’s own construction programme, which confirms that the National Grid Substation, Project Substation, BESS compound and associated Great Moulton, Tivetshall St Margaret and Wacton cluster infrastructure will be under construction for 18–24 months. A construction period of this duration cannot be described as short-term under any recognised assessment framework. Under BS 5228, WHO Environmental Noise Guidelines, DMRB LA 104, IEMA construction guidance, and standard EIA practice, “short-term” effects are typically defined as lasting days to weeks, while effects lasting more than one year are categorised as medium-	The Applicant acknowledges that construction duration will be 18-24 months. As detailed within Chapter 2, for purposes of the assessment, the construction phase effects may result from activities during site preparation, enabling works and also construction and commissioning activities. This covers sources of effects such as construction traffic, construction activity noise and vibration, dust generation, site runoff, mud on roads, risk of fuel and oil spillage and the visual intrusion of plant and machinery on Site. The duration of construction-related effects will be different for different activities. For example, impacts related to earth moving are likely to be short in duration compared with the construction of energy infrastructure or landscaping activities. Paragraph 2.8.6 of ES Volume 1, Chapter 2: Environmental Impact Assessment Methodology [AP-038] clearly sets out the assessment scenarios and development phase durations that have been considered in the Environmental Impact Assessment. In respect of construction, it states: <i>‘Construction in 2028-2030. The peak construction year for the purpose of the EIA is anticipated to be 2029. This assumes</i>

ID	Theme	Representation	Applicant's Response
		term and carry a higher likelihood of significant adverse impact. By misclassifying a two-year construction programme as "short-term", the ES artificially reduces the assessed significance of: • construction noise • construction vibration • construction lighting • HGV movements • construction traffic noise • cumulative disturbance from the Great Moulton, Tivetshall St Margaret and Wacton cluste This misclassification suppresses the true scale of harm and results in an unlawful in-combination effects assessment under Regulation 5(2) and Schedule 4 of the EIA Regulations. The Examining Authority cannot rely on the ES's conclusions regarding construction noise or its combined effects on	<i>commencement of construction in 2028 and that the Scheme is built out over a 24-month period.'</i> ES Volume 1, Chapter 4 - The Scheme [APP-040], includes the following text regarding the construction phase: <i>'The construction of the Scheme is anticipated to commence in 2028 for a period of approximately 24 months. On this basis, it is expected that the Scheme could be completed by 2030 and energised in 2031. However, the construction period will vary depending on detailed layout design and potential environmental constraints on the timing of construction activities.'</i> Construction effects are temporary in nature and considered short-term. ES Volume 1, Chapter 4 - The Scheme [APP-040], includes the following text regarding the operation and maintenance phase: <i>'The Applicant is seeking a time-limited consent with respect to the operation of the Scheme, which will start from the date of the final commissioning phase of the Scheme. The operational life of the Scheme is anticipated to be 60 years.'</i> ES Volume 1, Chapter 4 - The Scheme [APP-040], includes the following text regarding the decommissioning: <i>'Decommissioning is expected to occur after the 60-year design life of the Scheme in 2091 and take between 12 and 24 months. A requirement to decommission the Scheme is secured via a Requirement in the Draft DCO [APP-3.1].'</i>

ID	Theme	Representation	Applicant's Response
		residents, PRow users or heritage receptors.	Decommissioning effects are temporary in nature and considered short-term. The assessment years define the assessment scenario being considered for the Environmental Impact Assessment, whereas the temporal scope considers the duration of the effect. The duration of the effect may not be relevant for the entirety of the phase of development being assessed
GMAG-164	Noise and Vibration	6.6. Operational Noise Sources 9.6.1. 400kV Transformers Transformers generate: • continuous hum • tonal components • low-frequency noise • cooling fan noise The ES does not model these accurately. 9.6.2. BESS Cooling Systems BESS units require: • active cooling • fans	Operational noise from 400 kV transformers and BESS systems is assessed within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The results of the modelling are presented in ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179]. Switchgear is quiet during operation and does not form a significant noise source on the Proposed Scheme. The assessment of noise from overhead lines was scoped out in ES Volume 3, Appendix 2.1 - EIA Scoping Report [APP-113] and confirmed as accepted by the ExA within ES Volume 3, Appendix 2.2 - EIA Scoping Opinion.

ID	Theme	Representation	Applicant's Response
		• pumps • HVAC systems These operate continuously and can generate: • broadband noise • tonal noise • intermittent peaks No modelling has been provided. 9.6.3. Switchgear and Auxiliary Equipment Switchgear produces: • intermittent noise • operational clicks • cooling noise Not assessed. 9.6.4. Overhead Line Conductors Under certain conditions, overhead lines can produce: • corona noise • crackling	

ID	Theme	Representation	Applicant's Response
		hissing Not assessed.	
GMAG-165	Lighting	9.7 Lighting Impacts No Assessment of Lighting Impacts The ES includes a Lighting Strategy (Appendix 7.11), but the ES does not assess it, does not model lighting impacts, and does not evaluate effects on residents, dark skies, bats, PRow users or landscape character. The Lighting Strategy confirms that the National Grid Substation, the 132kV and 400kV Project Substations and the BESS will all require operational lighting, yet the ES provides no assessment of the resulting impacts. The ES does not include: - lighting modelling - assessment of light spill - assessment of skyglow - assessment of impacts on residential receptors - assessment of ecological impacts	The operational lighting for the Scheme has been designed to be minimised in accordance with the Design Principles set out in the Design Approach Document [APP-212] and the Design Principles, Parameters and Commitments [APP-213]. As set out in ES Volume 1, Chapter 4 – The Scheme [APP-040], lighting is not required within the Solar PV Arrays during the operational phase. Lighting of the Project Substations, National Grid Substation and BESS would be in accordance with health and safety requirements, particularly around emergency exits, and would be similar to street lighting that operates from dusk. Lighting has been designed to be directional, downward-facing and controlled to minimise light spill, in accordance with the Institution of Lighting Professionals (ILP) guidance, as set out in the ES Volume 3, Appendix 7.11 – ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151].

ID	Theme	Representation	Applicant's Response
		- assessment of night-time visual effects - assessment of cumulative lighting impacts ES Figure 7.4 (CPRE Dark Skies Map) confirms that the Great Moulton, Tivetshall St Margaret and Wacton cluster lies within some of the darkest rural skies in Norfolk (0.25–1 nW/cm²/sr). This is an E2 Rural Environmental Lighting Zone under ILP GN01. Despite this highly sensitive baseline, the LVIA and ES contain no night-time assessment, no skyglow modelling, and no evaluation of lighting impacts on dark skies, tranquillity or residential receptors.	
GMAG-166	Lighting	9.7.2. Operational Lighting Operational lighting will include: - substation lighting - BESS lighting - security lighting - maintenance lighting - access road lighting	The Applicant addressed this comment with regards to lighting in GMAC-165.

ID	Theme	Representation	Applicant's Response
		These will introduce: • skyglow • light spill • glare • loss of dark skies into a rural area.	
GMAG-167	Lighting	9.7.3. Night-Time Visual Impacts Lighting will be visible from: • Frith Way • Station Road • Woodrow Lane • Low Road • PRow network The ES does not assess these impacts.	The Applicant addressed this comment with regards to lighting in GMAC-165.
GMAG-168	Noise and Vibration Lighting Policy compliance	9.8. Policy Non-Compliance The scheme does not comply with: • NPS EN-1 (noise, lighting, human health) • NPS EN-3 (BESS noise and safety)	The Applicant addressed this comment with regards to noise and vibration in GMAC-149-159. The Applicant addressed this comment with regards to lighting in GMAC-165. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the

ID	Theme	Representation	Applicant's Response
		- NPS EN-5 (substation noise and overhead line noise) - EIA Regulations (baseline, cumulative effects) - BS 4142 (tonal penalties) - BS 8233 (internal noise levels) - NPPF (noise and amenity protection) The applicant has not demonstrated that impacts have been minimised or mitigated.	Scheme complies with relevant national and local planning policies.
GMAG-169	Noise and Vibration Lighting	9.10 Conclusions and Planning Weight GMAG submits that the noise, vibration and lighting assessment is incomplete, outdated and not compliant with the EIA Regulations, NPS EN-1, EN-3, EN-5, the NPPF or relevant British Standards including BS 4142 and BS 8233. The ES does not assess the scheme as currently proposed, does not include the full 400kV infrastructure, and does not evaluate low-frequency noise, tonal characteristics, night-time impacts or cumulative effects. Lighting strategy exists but its impacts are not assessed. As a result, the ES does not enable the Examining Authority to understand the	The Applicant considers that it is fully compliant with the EIA Regulations. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies. The Applicant addressed this comment with regards to noise and vibration in GMAC-149-159.

ID	Theme	Representation	Applicant's Response
		scale, extent or significance of noise and lighting impacts arising from the development. The scheme would: • introduce continuous industrial noise into a tranquil rural environment • generate tonal and low-frequency hum from 400kV transformers • produce continuous cooling noise from the BESS compound • create night-time lighting impacts in an area currently characterised by dark skies • degrade residential amenity for properties closest to the Great Moulton, Tivetshall St Margaret and Wacton cluster • erode rural tranquillity and the acoustic character of the landscape • generate significant cumulative noise from multiple colocated infrastructure elements These impacts are substantial, adverse and long-lasting. They cannot be mitigated to an acceptable level due to	

ID	Theme	Representation	Applicant's Response
		the scale, intensity and continuous nature of the operational noise sources and the requirement for permanent lighting at the substations and BESS compound. Planning Weight: Given the absence of low-frequency and tonal noise modelling, the lack of night-time baseline data, the omission of key receptors, the failure to assess lighting impacts, and the complete absence of cumulative noise assessment, GMAG submits that substantial negative weight must be attached to the noise, vibration and lighting impacts of the scheme. The ES, as submitted, does not meet the requirements of Regulation 14 and cannot lawfully support a grant of development consent. Until a complete, accurate and regulation-compliant assessment is provided, the applicant's noise and lighting case carries very limited weight in the planning balance.	
GMAG-170	Other Environmental Matters	Safety (BESS, Substation, Aviation and Emergency Response) 10.1. Introduction and Summary of Concerns	The Applicant's Outline BSMP [APP-200] fully complies with NFCC guidance and HSE requirements for grid scale BESS projects. All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire

ID	Theme	Representation	Applicant's Response
	BESS Safety	GMAG has major concerns regarding the safety of the proposed development, particularly the risks associated with the Battery Energy Storage System (BESS), the 400kV National Grid substation, and the co-located project substation. The applicant has not provided a lawful or robust assessment of major accident hazards, emergency response, firewater containment, or the interaction between multiple high-risk infrastructure elements concentrated within the Great Moulton, Tivetshall St Margaret and Wacton cluster. The Environmental Statement (ES) does not comply with: • NPS EN-1 (major accident hazards, safety, emergency planning) • NPS EN-3 (BESS safety, fire risk, thermal runaway) • NPS EN-5 (substation safety, transformer failures, overhead line hazards) • EIA Regulations (assessment of likely significant effects) • UK Fire s Rescue Service guidance	and explosion risk are stipulated in Section 5.1.5 of the OBSMP. The Applicant considers that it is fully compliant with the EIA Regulations. The Applicant confirms that firefighting water supply and pollution containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple BESS enclosures to be involved, and is not limited to routine or minor events. The illustrative design includes two water tanks, each with approximately 228,000 litres of water. This would provide 1,900 litres per minute for approximately 4 hours of water which is more than double the 2-hour minimum duration at 1500 LPM (180,000 litres) stated in 2026 NFCC guidance. The firefighting water requirement will be fully assessed at the detailed design stage based upon a comprehensive review of BESS fire and explosion test data for the selected BESS system by an independent Fire Protection Engineer and water storage volumes will be fully agreed with NFRS. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS suppliers advise that hose streams should not be directly discharged on BESS battery systems. Claims that millions of litres of water are required to tackle a single BESS fire (as regularly referenced on internet forums) are incorrect, this type of assumption is based upon a two ground monitor units being deployed

ID	Theme	Representation	Applicant's Response
		- NFCC BESS Operational Guidance - HSE expectations for major hazard assessment The scheme would introduce: - a large-scale lithium-ion BESS - a 400kV National Grid substation - a second project substation - overhead lines and gantries - transformers containing large volumes of oil - high-voltage switchgear - security fencing and restricted access - night-time lighting and human activity into a rural area with limited emergency response capacity. GMAg submits that the safety assessment is incomplete, inconsistent and insufficient to support a lawful decision. GMAg has reviewed the applicant's "Outline Battery Safety Management Plan". This document does not	each discharging 1900 LPM for 24 hours, i.e. 5,472,000 litres of water directly on battery systems within a BESS enclosure. This tactic is not necessary and could create environmental pollution risks and significantly prolong any BESS fire event. If firefighters are applying water fog or spray patterns to adjacent BESS enclosures or deploying defensive spray plates that form a water curtain between the affected enclosure and adjacent BESS these "boundary cooling" tactics would likely be applied intermittently in 15-minute application periods with internal and external BESS temperature changes measured between application periods. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response.

ID	Theme	Representation	Applicant's Response
		constitute a safety assessment and does not address the risks associated with the proposed BESS. It contains no firewater volume calculations, no PFAS analysis, no thermal runaway propagation modelling, no cascading failure assessment, no contaminated runoff modelling, no groundwater pathway assessment, no dual-catchment hydrological analysis, no transformer oil spill modelling, and no quantitative risk assessment. It is a generic, high-level outline that defers all meaningful safety work to post-consent stages. As such, it does not provide the Examining Authority with the information required under Regulation 14, NPS EN-1 or NPS EN-3 to understand the likely significant effects of the BESS or the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster. The applicant has therefore not provided a lawful or proportionate assessment of BESS safety.	Because the illustrative current BESS design utilised for OBSMP drafting and fire emission modelling demonstrated that a fire did not propagate during Large Scale Fire Testing (LSFT) then the Applicant has demonstrated that the loss of a single BESS enclosure is a credible worst-case event for the safety and risk assessment documentation submitted for the DCO. The Outline BSMP [APP-200] Section 4.5 documents the drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The Applicant has agreed with the Environment Agency that any fire protection systems considered for the Scheme will not integrate Suppression Agents that contain PFAS. The approach set out in the Outline BSMP [APP-200] is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The Environment Agency (EA) is a statutory consultee for the Scheme, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A Statement of Common Ground between

ID	Theme	Representation	Applicant's Response
			the Applicant and the EA will be submitted as part of the DCO process. 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. The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [APP-017]. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency, prior to the commencement of the works for the BESS. The BSMP will be substantially in accordance with the oBSMP.

ID	Theme	Representation	Applicant's Response
GMAG-171	BESS safety	10.2. BESS Fire Safety and Thermal Runaway 10.2.1. Absence of a BESS Fire Safety Strategy The ES does not include: • a BESS fire safety strategy • thermal runaway modelling • fire propagation analysis • firewater containment design • emergency access plans • separation distances • explosion modelling • smoke plume modelling This is a major omission.	The Applicant's Outline BSMP [APP-200] covers all key BESS failure safety issues, namely fire risks, explosion risks, pollution risks, and fire toxic emission risks. This is the defined purpose of the Outline BSMP, this detailed information does not belong in the ES and all the Applicant's responses below signpost where the information is located within the oBSMP.
GMAG-172	BESS safety	10.2.2. Thermal Runaway Risks Lithium-ion batteries can enter thermal runaway, producing: • intense, long-duration fires • toxic gases • carcinogenic particulates • PFAS-laden firewater	The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The safety objectives for the design of the Applicant's BESS site are listed in Section 1.4 of the Outline BSMP [APP-200].

ID	Theme	Representation	Applicant's Response
		- explosive cell venting - rapid fire spread between units The ES does not assess these risks.	Section 1.4.2 of the Outline BSMP [APP-200] stipulates: <i>"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> <i>To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i> <i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."</i> Section 4 of the oBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance.

ID	Theme	Representation	Applicant's Response
			NFPA 855 (2026) defines a safe BESS exclusion zone as follows: "Potential debris impact radius is defined as 100 feet (ft) or 30.5 metres (m) i.e. this is a typical explosion risk safe exclusion zone radius as modelling and previous BESS incidents typically show 25 m to be maximum radius." Further explosion prevention, mitigation, and safety requirements for the Scheme are stipulated in the OBSMP Sections: 3.1.4 – 3.1.5, 3.1.10, 3.1.18, 3.1.27, 3.1.30 – 3.1.31, 4.1.6, 5.1.3 - 5.1.6. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the oBSMP pre-construction requirements (Section 5). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure fire, to determine propagation risk to adjacent BESS or equipment, and establish minimum equipment spacing distances. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc.

ID	Theme	Representation	Applicant's Response
			The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032], which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Norfolk Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. A BESS Fire Emissions to Air Risk Assessment (Plume Study) has been undertaken to understand the potential air quality impacts of emissions released during a BESS fire on human receptors. This assessment is presented in Appendix B of the Outline BSMP [APP-200] and has been used to inform emergency response mitigation measures presented in the Outline BSMP. The Plume Study demonstrated that there were no significant impacts on any sensitive residential receptor location with 1km of the BESS compound in the event of a BESS fire. The Plume Study identified 3 PROWS (Tivetshall St Margaret Footpath 3 located 60m east, Great Moulton Restricted Bridleway 18 approximately 90m north-east, Great Moulton Restricted Bridleway 19 approximately

ID	Theme	Representation	Applicant's Response
			40m north of the BESS Unit locations based on the indicative BESS layout) that may need to be temporarily closed in the event of a BESS fire. A risk assessment of the potential impact on visibility has also been undertaken for nearby road and rail receptors. The predicted visibility distances in the event of a BESS fire are greater than the safe stopping distances for roads and rail.
GMAG-173	BESS safety Contamination	10.2.3. Firewater and PFAS Contamination BESS firewater contains: • PFAS • heavy metals • acidic and alkaline compounds • dissolved plastics • carcinogenic by-products The site lies on a highly permeable chalk aquifer with shallow groundwater. The ES does not assess: • firewater containment • firewater migration • PFAS contamination	Section 4.5 of the Outline BSMP [APP-200] documents the drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The Applicant has agreed with the Environment Agency that any fire protection systems considered for the Scheme will not integrate Suppression Agents that contain PFAS. The approach set out in the oBSMP is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The Environment Agency (EA) is a statutory consultee for the Scheme, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A Statement of Common Ground between the Applicant

ID	Theme	Representation	Applicant's Response
		- groundwater vulnerability - winterbourne mobilisation This is a critical safety and environmental failure.	and the EA will be submitted as part of the DCO process. 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. The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032]. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency, prior to the commencement of the works for the BESS. The BSMP will be substantially in accordance with the oBSMP. Groundwater vulnerability baseline information is presented in Table 3.9 of the Phase 1 Ground

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			Conditions Assessment [APP-184]. Groundwater within the superficial Secondary Undifferentiated Lowestoft Formation Diamicton aquifer, which underlies the majority of the Order Limits is classified by the Environment Agency as “Medium” vulnerability. Groundwater within the superficial Secondary A Aquifers is classified by the Environment Agency as being of “High” vulnerability. Groundwater within the bedrock strata is classified by the Environment Agency as being of “Low” vulnerability.
GMAG-174	Battery safety	10.2.4. Separation Distances and Layout Industry guidance requires: - adequate spacing between BESS units - firewalls or blast walls - separation from substations - separation from overhead lines - separation from public rights of way The ES does not demonstrate compliance.	The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The oBSMP is fully compliant with NFCC guidance and NFPA 855 (2026) BESS design, safety, and testing requirements. Firewalls or blast walls will not be required for the Scheme and separation distances to substations or overhead lines have been fully assessed to validate the illustrative BESS site design. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in Appendix B: Battery Energy Storage System (BESS) Fire – Emissions to Air Risk Assessment of the Outline BSMP [APP-200]) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors

ID	Theme	Representation	Applicant's Response
			within a 1km radius of the BESS area, this includes public rights of way (PROW). The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude that the <i>"proposed development should not result in any significant adverse impact on public health."</i> The spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred; therefore, this is a credible worst-case scenario. The Plume Study identified 3 PROWS (Tivetshall St Margaret Footpath 3 located 60m east, Great Moulton Restricted Bridleway 18 approximately 90m north-east, Great Moulton Restricted Bridleway 19 approximately 40m north of the BESS Unit locations based on the indicative BESS layout) that may need to be temporarily closed in the event of a BESS fire. The requirement for these measures will be reviewed at the detailed design phase when test data information on the fire emissions associated with the selected BESS. It

ID	Theme	Representation	Applicant's Response
			is possible that the BESS Units taken forward will have lower emissions in the event of a fire than those modelled in this risk assessment and therefore the measures above may not be necessary at the time of operation. To validate the final BESS site design, the Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 4.5.13 of the oBSMP and secured through the DCO: "at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data

ID	Theme	Representation	Applicant's Response
			will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [APP-200] pre-construction requirements (Section 5). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure fire, to determine propagation risk to adjacent BESS or equipment, and establish minimum equipment spacing distances. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. The purpose of this testing is expressly to validate minimum equipment spacing and to demonstrate that cascading or multi-BESS enclosure ignition does not occur where tested layouts and mitigation measures are implemented. These tests therefore explicitly address the type of multi-BESS fire propagation risks, including scenarios observed in real world incidents, by requiring evidence that propagation risk is controlled through design rather than reliance on emergency intervention. Sections 5.1.3 – 5.1.6 of the Outline BSMP [APP-200] addresses the requisite risk assessments and consequence modelling that address all credible BESS failure events which will be provided at the detailed design stage. The Applicant will also commission site specific heat flux and flame tilt consequence modelling

ID	Theme	Representation	Applicant's Response
			to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. Most current BESS systems are designed to safely burn out without internal fire suppression systems (to remove the risk of stranded energy in the battery systems), Large Scale Fire Testing (LSFT) must be conducted to demonstrate that loss will be safely limited to one container without the intervention of fire fighters. Most of these BESS enclosure designs integrate LFP prismatic cells and have demonstrated fire propagation does not occur to other BESS enclosures at distances ranging from 15cm – 100cm to adjacent or back-to-back BESS enclosures with spacing of 3-3.5 metres across from the next row / block of BESS enclosures. These current BESS designs integrate high levels of thermal insulation to prevent a fire from spreading to adjacent BESS enclosures. The insulation is designed to ensure that external heat from a BESS fire does not increase internal temperatures of adjacent BESS to critical levels i.e. <100C. Because the illustrative current BESS design utilised for Outline BSMP [APP-200] drafting and fire emission modelling demonstrated that a fire did not propagate during Large Scale Fire Testing (LSFT) then the Applicant has demonstrated that the loss of a single BESS enclosure is a credible worst-case event for the

ID	Theme	Representation	Applicant's Response
			safety and risk assessment documentation submitted for the DCO. The Applicant regularly evaluates BESS system defect and root cause analysis reports to inform all critical aspects of BESS safety required for procurement, construction, installation, commissioning, and decommissioning phases of projects. Factory Acceptance Testing (FAT) and Site Acceptance Testing (SAT) are key components in ensuring credible BESS failure scenarios are prevented and fully mitigated should they occur. Section 1.4.2 of the Outline BSMP [APP-200] stipulates: <i>"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> • <i>To ensure that fire, smoke, and any release of toxic gases does not significantly impact site</i>

ID	Theme	Representation	Applicant's Response
			<i>operatives, first responders, and the local community; and</i> <i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."</i> The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032], which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Norfolk Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
GMAG-175	Battery safety	10.2.5. Emergency Response Limitations Thermal runaway fires: - cannot be extinguished conventionally - require large volumes of water - require specialist equipment	The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations and fully complying with the National Fire Chiefs Council (NFCC) Grid scale energy storage system planning guidance (2026). Section 2 of the Outline BSMP [APP-200] documents the Applicant's consultation with NFRS. Section 4 of the oBSMP covers all requisite firefighting requirements for

ID	Theme	Representation	Applicant's Response
		• can burn for many hours or days Norfolk Fire C Rescue Service does not have: • specialist BESS firefighting equipment • high-volume pumps • PFAS containment capability The ES does not assess emergency response capacity.	the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Applicant will provide any specialist firefighting equipment required by NFRS, this would be stored within the BESS site. The requirement for specialist equipment will be ascertained at the detailed design stage in consultation between the Applicant and NFRS. The Outline BSMP [APP-200] fully accommodates the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. The Outline BSMP [APP-200] stipulates: "As a minimum, the battery system will have completed unit or installation level UL 9540A (6th Edition) testing, the BESS design will have completed large scale fire testing (LSFT) to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of Fire Fighters. NFPA 855 (2026) mandates that Large Scale Fire Testing (LSFT) which is full scale burn testing of the BESS system to validate safe equipment spacing, must be conducted and the BESS selected at detailed design must as a minimum have completed this testing under the UL 9540A test program or an accredited 3rd Party LSFT test program i.e. CSA, DNV, TUV SUD, etc".

ID	Theme	Representation	Applicant's Response
			The Applicant confirms that firefighting water supply and pollution containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple BESS enclosures to be involved, and is not limited to routine or minor events. The illustrative design includes two water tanks, each with approximately 228,000 litres of water. This would provide 1,900 litres per minute for approximately 4 hours of water which is more than double the 2-hour minimum duration at 1500 LPM (180,000 litres) stated in 2026 NFCC guidance. The firefighting water requirement will be fully assessed at the detailed design stage based upon a comprehensive review of BESS fire and explosion test data for the selected BESS system by an independent Fire Protection Engineer and water storage volumes will be fully agreed with NFRS. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS suppliers advise that hose streams should not be directly discharged on BESS battery systems. Claims that millions of litres of water are required to tackle a single BESS fire (as regularly referenced on internet forums) are incorrect, this type of assumption is based upon a two ground monitor units being deployed each discharging 1900 LPM for 24 hours, i.e. 5,472,000 litres of water directly on battery systems within a BESS enclosure.

ID	Theme	Representation	Applicant's Response
			This tactic is not necessary and could create environmental pollution risks and significantly prolong any BESS fire event. If firefighters are applying water fog or spray patterns to adjacent BESS enclosures or deploying defensive spray plates that form a water curtain between the affected enclosure and adjacent BESS these “boundary cooling” tactics would likely be applied intermittently in 15-minute application periods with internal and external BESS temperature changes measured between application periods. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 4.4.3 – 4.4.5 of the Outline BSMP [APP-200] stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: “<i>Emergency procedures for all credible hazards and risks, including</i>

ID	Theme	Representation	Applicant's Response
			<i>building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.”</i> Section 4.5 of the Outline BSMP [APP-200] documents the drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the oBSMP is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The Environment Agency (EA) is a statutory consultee for the Scheme, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A Statement of Common Ground between the Applicant and the EA will be submitted as part of the DCO process. The Applicant has agreed with the Environment Agency that any fire protection systems considered for the Scheme will not integrate Suppression Agents that contain PFAS. The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032]. This stipulates that a detailed Battery Safety

ID	Theme	Representation	Applicant's Response
			Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency, prior to the commencement of the works for the BESS. The BSMP will be substantially in accordance with the Outline BSMP [APP-200] .
GMAG-176	Major Accidents and Disasters	10.3. Substation Safety and Transformer Risks 10.3.1. Transformer Oil Fires 400kV transformers contain large volumes of oil. Transformer failures can cause: • pool fires • explosions • oil spray fires • firewater contamination • smoke plumes The ES does not assess these risks.	It was agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] has been produced to further demonstrate that Major Accidents and Disasters have been sufficiently addressed in addition to the evidence provided at the scoping stage that led to it being scoped out to increase confidence that there are no MAD risks, with mitigation measures secured and pose no likely significant effects. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205] and the Design Principles, Parameters and Commitments [APP-213].
GMAG-177	Major Accidents and Disasters	10.3.2. Switchgear Failures High-voltage switchgear can fail catastrophically, causing: • arc flash	It was agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] has been produced to further

ID	Theme	Representation	Applicant's Response
		- explosions - fire - projectiles No assessment has been provided.	demonstrate that Major Accidents and Disasters have been sufficiently addressed in addition to the evidence provided at the scoping stage that led to it being scoped out to increase confidence that there are no MAD risks, with mitigation measures secured and pose no likely significant effects. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205] and the Design Principles, Parameters and Commitments [APP-213].
GMAG-178	Major Accidents and Disasters	10.3.3. Interaction Between BESS and Substations The co-location of: - a 400kV substation - a second substation - a large BESS compound creates: - cascading failure risk - fire spread potential - combined firewater contamination - increased emergency response complexity	It was agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] has been produced to further demonstrate that Major Accidents and Disasters have been sufficiently addressed in addition to the evidence provided at the scoping stage that led to it being scoped out to increase confidence that there are no MAD risks with mitigation measures secured and pose no likely significant effects. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205] and the Design Principles, Parameters and Commitments [APP-213].

ID	Theme	Representation	Applicant's Response
		The ES does not assess combined risks.	
GMAG-179	Major Accidents and Disasters	10.4. Overhead Line and Gantry Safety The Great Moulton, Tivetshall St Margaret and Wacton cluster includes: • 400kV overhead lines • gantries • pylons • cable sealing ends Risks include: • conductor failure • flashover • lightning strike • ice shedding • corona discharge • fire ignition None of these risks are assessed.	It was agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] has been produced to further demonstrate that Major Accidents and Disasters have been sufficiently addressed in addition to the evidence provided at the scoping stage that led to it being scoped out to increase confidence that there are no MAD risks, with mitigation measures secured and pose no likely significant effects. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205] and the Design Principles, Parameters and Commitments [APP-213].
GMAG-180	Aviation	10.5. Aviation Safeguarding The site lies within the safeguarding zone for:	The Applicant notes that the Scheme is within the safeguarding zone for Tibenham Airfield, and aviation activity associated with Norfolk Gliding Club. The Applicant has assessed risks including glint and glare ES Volume 3, Appendix 18.1 – Glint and Glare

ID	Theme	Representation	Applicant's Response
		- Tibenhams Airfield (gliding and light aircraft) - Norwich Airport controlled airspace (depending on height) Risks include: - tall structures affecting flight paths - lighting affecting night operations - turbulence and thermal effects - emergency landing constraints The ES does not assess aviation impacts.	Assessment [APP-189] to [APP-193] turbulence and thermal effects and emergency landing constraints High Level Investigative Report [APP-222]. The Scheme is not predicted to cause a significant impact upon these considerations. The Scheme is not considered to pose a risk to aviation activity associated with Norwich Airport, due to the distance between the aerodrome and the Scheme. The nearest part of the Scheme is more than 16km from Norwich Airport and is therefore beyond all the obstacle limitation surfaces of the airport, which extend to a maximum of 15km radius from the airport. The Scheme does not involve any tall structures that could affect the flight paths of aircraft using Norwich Airport. Considerations relating to controlled airspace are not relevant for the Scheme. The Applicant considers the ES has assessed aviation safeguarding concerns appropriately.
GMAG-181	Transport and Access Major Accidents and Disasters	10.6. Emergency Access and Response 10.6.1. Inadequate Access Routes Access routes are: - narrow - rural - Constrained	The Applicant notes the concern regarding the suitability of access routes for emergency vehicles. The suitability of the proposed access arrangements has been demonstrated through swept path analysis undertaken as part of the Transport Assessment [APP-174 to 177]. These assessments are provided within Appendix C of the Transport Assessment [APP-174 to 177] and demonstrate that the proposed

ID	Theme	Representation	Applicant's Response
		- unsuitable for large emergency vehicles The ES does not assess: - fire appliance access - turning radii - water supply availability - emergency egress 10.6.2. No Emergency Response Plan The ES does not include: - an emergency response plan - fire service consultation - evacuation procedures - incident command arrangements - hazardous materials protocols This is a major omission.	site access arrangements can accommodate the vehicles anticipated to use them. In particular, swept path analysis has been undertaken for the BESS access arrangements using an emergency fire appliance, demonstrating that emergency vehicles can access the site. In addition, swept path analysis has been undertaken for the proposed site accesses using construction HGVs. Given that these vehicles represent a larger design vehicle than a typical emergency response vehicle, the assessments demonstrate that emergency vehicles would also be capable of accessing the relevant site accesses. Site access drawings and vehicle tracking assessments included within the Transport Assessment [APP-174 to 177] demonstrate the suitability of turning movements and access arrangements for the proposed design vehicles. Accordingly, the Applicant does not agree that the access routes are unsuitable for large emergency vehicles. With regards to fire safety and associated concerns, the Applicant refers to GMAG-170
GMAG-182	Major Accidents and Disasters	10.7. Major Accident Hazard Assessment The EIA Regulations require assessment of:	It was agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of ES Volume 1, Chapter 18 Other Environmental

ID	Theme	Representation	Applicant's Response
		- major accident hazards - risk to human health - risk to the environment cumulative accident risk The ES does not provide: - a major accident hazard assessment - quantitative risk analysis - hazard identification (HAZID) - hazard and operability study (HAZOP) - failure mode analysis This is non-compliant.	Matters [APP-054] has been produced to further demonstrate that Major Accidents and Disasters have been sufficiently addressed, with mitigation measures secured and pose no likely significant effects. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205] and the Design Principles, Parameters and Commitments [APP-213].
GMAG-183	Major Accidents and Disasters Battery safety	10.8. Policy Non-Compliance The scheme does not comply with: - NPS EN-1 (major accidents, safety, emergency planning) - NPS EN-3 (BESS safety, fire risk, thermal runaway) - NPS EN-5 (substation safety, transformer failures)	It was agreed through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] has been produced to further demonstrate that Major Accidents and Disasters have been sufficiently addressed, with mitigation measures secured and pose no likely significant effects. Management and mitigation measures are secured through the various outline

ID	Theme	Representation	Applicant's Response
		- EIA Regulations (assessment of likely significant effects) - NFCC BESS Operational Guidance - HSE expectations for major hazard assessment The applicant has not demonstrated that the scheme is safe, deliverable or compliant.	management plans [APP-196 to APP-205] and the Design Principles, Parameters and Commitments [APP-213]. The Applicant's Outline BSMP [APP-200] fully complies with NFCC guidance and HSE requirements for grid scale BESS projects. All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are stipulated in Section 5.1.5 of the Outline BSMP [APP-200]. Compliance with National Policy Statements is set out in the Policy Compliance Document [APP-210].
GMAG-184	Major Accidents and Disasters Battery safety	10.6. Conclusions and Planning Weight GMAG submits that the safety assessment for the BESS, substations, overhead lines and associated infrastructure is incomplete, inconsistent and not compliant with the EIA Regulations, NPS EN-1, EN-3, EN-5, NFCC operational guidance or HSE expectations for major accident hazard assessment. The ES does not assess thermal runaway, fire propagation, transformer failures, firewater contamination, PFAS mobilisation, emergency response capability, cascading failure risk or the combined	It was agreed through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] has been produced to further demonstrate that Major Accidents and Disasters have been sufficiently addressed, with mitigation measures secured and pose no likely significant effects. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205] and the Design Principles, Parameters and Commitments [APP-213]. The Applicant's Outline BSMP [APP-200] fully complies with NFCC guidance and HSE requirements

ID	Theme	Representation	Applicant's Response
		hazards arising from the colocation of multiple high-risk assets within the Great Moulton, Tivetshall St Margaret and Wacton cluster. The development would introduce: • a large-scale lithium-ion BESS with unassessed thermal runaway and explosion risk • two colocated substations operating at 400kV with unassessed transformer fire and arc-flash hazards • major accident hazards associated with oil-filled transformers, switchgear and overhead lines • unassessed PFAS-laden firewater contamination pathways into a highly permeable chalk aquifer • emergency response requirements that exceed the capability of local Fire C Rescue resources • aviation safeguarding risks due to tall structures, lighting and proximity to Tibenham Airfield	for grid scale BESS projects. All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are stipulated in Section 5.1.5 of the OBSMP. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.

ID	Theme	Representation	Applicant's Response
		• cumulative and cascading failure risks arising from the concentration of high-risk infrastructure These risks are significant, credible and potentially severe. The applicant has not demonstrated that they can be prevented, contained or mitigated to an acceptable level. The absence of a BESS fire safety strategy, thermal runaway modelling, firewater containment design, emergency access plan, or major accident hazard assessment means that the ES does not provide the Examining Authority with the information required to understand the likely significant effects of the development on human health, the environment or emergency responders. Planning Weight: Given the scale of the hazards, the vulnerability of the local environment, the proximity of residential receptors, the limited emergency response capacity, and the complete absence of a lawful major accident hazard assessment, GMAG submits that substantial negative weight must be attached to the safety risks associated	

ID	Theme	Representation	Applicant's Response
		with the scheme. The ES, as submitted, does not meet the requirements of Regulation 14 and cannot lawfully support a grant of development consent. Until a complete, evidence-based and regulation-compliant safety assessment is provided, the applicant's safety case carries very limited weight in the planning balance.	
GMAG-185	Transport and Access	Transport and Access 11.1 Introduction and Summary of Concerns GMAG has major concerns regarding the transport and access impacts of the proposed development. The scheme would generate substantial construction traffic, including HGVs, LGVs, staff vehicles, abnormal loads and escort vehicles, all using a constrained rural road network that is not designed to accommodate such volumes or vehicle types. The Environmental Statement (ES) significantly underestimates these impacts. Key data is missing, traffic modelling is incomplete, and the	The Applicant acknowledges the concerns raised regarding the potential transport and access effects of the Scheme, including construction traffic, road safety, cumulative effects, abnormal indivisible loads (AILs), community impacts and the adequacy of the assessment undertaken. The Applicant considers that these matters have been appropriately assessed within the application documents submitted in support of the Scheme, including: • ES Volume 1, Chapter 11 - Transport and Access [APP-047]; • ES Volume 3, Appendix 11.1 -Transport Assessment [APP-174 to 177]; • Outline CTMP [APP-201];

ID	Theme	Representation	Applicant's Response
		applicant has not assessed the combined effects of construction traffic, abnormal loads, road closures, diversions and simultaneous construction activities across the Great Moulton, Tivetshall St Margaret and Wacton cluster. The ES does not comply with: • NPS EN-1 (transport, safety, cumulative effects) • NPS EN-3 (construction traffic for solar and BESS) • NPS EN-5 (abnormal loads for substations and overhead lines) • EIA Regulations (assessment of likely significant effects) • DfT and Norfolk County Council standards The scheme would result in: • severe traffic congestion • road safety risks • damage to rural lanes • severance of local communities	• Outline OTMP [APP-202]; and • Outline PRow and Permissive Paths Management Plan [APP-203]. Detailed responses to the specific matters raised by Great Moulton Action Group are provided in responses GMAG-186 to GMAG-201, where the Applicant has addressed the concerns relating to construction traffic, highway capacity, road safety, cumulative effects, AIL movements, route suitability, temporary traffic management measures, Public Rights of Way and impacts on local communities and road users. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.

ID	Theme	Representation	Applicant's Response
		- unacceptable impacts on residents - cumulative construction disruption GMAG submits that the transport assessment is incomplete, inconsistent and insufficient to support a lawful decision.	
GMAG-186	Outline Construction Traffic Management Plan	GMAG has reviewed the applicant's "Outline Construction Traffic Management Plan". This document does not constitute a construction traffic impact assessment and does not provide the Examining Authority with the information required to understand the likely significant effects of construction traffic. It contains no junction capacity modelling, no assessment of collision risk on narrow rural lanes, no analysis of impacts on vulnerable road users, no cumulative construction traffic modelling for the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster, and no quantified assessment of noise, air quality, severance or residential amenity effects arising from HGV movements. The Outline CTMP is a high-level framework that defers all meaningful assessment to post-consent stages. As such, it does not	The Applicant notes the representation's comments regarding the role of the Outline CTMP [APP-201]. The Outline Construction Traffic Management Plan is intended to provide a framework for the management and mitigation of construction traffic during the construction period. The assessment of the likely significant effects of construction traffic is contained within ES Volume 1, Chapter 11 - Transport and Access [APP-047], which considers the transport impacts associated with the Scheme. The matters identified within the representation, including impacts on vulnerable road users, cumulative construction traffic effects, severance, non-motorised user amenity, non-motorised user delay, and fear and intimidation, have been assessed within ES Volume 1 Chapter 11: Transport and Access [APP-047]. Cumulative effects were specifically assessed within Section 11.11 of the chapter. The assessment of construction traffic effects is also considered within other Environmental Statement chapters. The assessment of noise and vibration effects

ID	Theme	Representation	Applicant's Response
		demonstrate compliance with Regulation 14, NPS EN-1 or NPS EN-3, and cannot be relied upon in the planning balance.	is presented in ES Volume 1 Chapter 12: Noise and Vibration [APP-048], while the assessment of air quality effects is presented in ES Volume 1 Chapter 13: Air Quality [APP-050]. Traffic data generated as part of the transport assessment, including construction HGV flows, informed these assessments where relevant. The Applicant also notes the reference to junction capacity modelling and collision risk assessment. The Scheme would give rise to temporary construction traffic effects during the construction period rather than permanent changes to traffic conditions on the highway network. The scope of assessment presented within Chapter 11: Transport and Access (APP-047) was agreed with Norfolk County Council and assessed the likely significant effects of the Scheme in accordance with the agreed assessment methodology. The Applicant agrees that the Outline CTMP [APP-201] is a framework document. This is consistent with standard DCO practice, whereby outline management plans are submitted at the application stage and detailed management plans are subsequently prepared pursuant to DCO Requirements following detailed design and prior to commencement of construction. The Outline Construction Traffic Management Plan [APP-201] nevertheless establishes the framework of mitigation and traffic management measures that would be implemented during construction, with the detailed

ID	Theme	Representation	Applicant's Response
			Construction Traffic Management Plan providing further detail on the implementation of those measures having regard to the final design, construction programme and local conditions. Accordingly, the Applicant does not agree that the assessment of construction traffic effects has been deferred to post-consent stages.
GMAG-187	Outline OTMP	GMAG has also reviewed the applicant's "Outline OTMP". This document does not constitute an assessment of operational or replacement-phase traffic impacts and provides no modelling of HGV movements, no assessment of safety risks on narrow rural lanes, no analysis of impacts on vulnerable road users, no cumulative assessment of operational and replacement activities, and no quantified assessment of noise, air quality, severance or residential amenity effects. The OTMP is a high-level framework that defers all meaningful assessment to post-consent stages, despite the applicant's own admission that replacement activities may involve up to 240 workers on site and up to 50 HGVs per day. As such, the OTMP does not demonstrate compliance with Regulation 14, NPS EN-1 or NPS EN-3,	The Applicant notes the representation regarding the Outline OTMP [APP-202]. Please refer to the Applicant's response to Representation GMAG-186, which explains that the assessment of traffic effects associated with the Scheme is contained within ES Volume 1, Chapter 11 - Transport and Access [APP-047], with associated noise and air quality effects assessed within the relevant Environmental Statement chapters. The Applicant also notes that operational and replacement-phase traffic levels are substantially lower than those associated with the construction phase, which represents the worst-case scenario in terms of traffic generation. Accordingly, the likely effects associated with operational and replacement activities are correspondingly lower than those assessed for the construction phase. The Outline OTMP [APP-202] provides a framework for the management of operational traffic, with detailed arrangements to be developed, where required, following consent.

ID	Theme	Representation	Applicant's Response
		and cannot be relied upon in the planning balance.	
GMAG-188	Outline Public Rights of Way and Permissive Paths Management Plan	GMAG has reviewed the applicant's "Outline Public Rights of Way and Permissive Paths Management Plan". This document does not constitute an assessment of PRoW impacts and provides no quantified analysis of closures, diversions, severance, safety risks, amenity loss or cumulative effects. It contains no assessment of interactions between construction traffic and PRoW users, no evaluation of impacts on promoted walking routes such as Boudicca Way and Via Beata, and no modelling of cumulative closures across the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster. The plan is a high-level framework that defers all meaningful assessment to post-consent stages and therefore does not remedy the deficiencies of the ES or demonstrate compliance with Regulation 14, NPS EN-1 or NPS EN-3.	The Applicant notes the representation regarding the Outline Public Rights of Way and Permissive Paths Management Plan [APP-203]. The Applicant does not agree that the document fails to identify the effects of the Scheme on Public Rights of Way (PRoWs) and permissive paths including Boudicca Way and Via Beata. Section 4.1 of the Outline Public Rights of Way and Permissive Paths Management Plan [App 203] identifies the PRoWs and permissive paths that would be temporarily affected during construction, including where temporary closures or diversions would be required. These are visualised in the Access and Rights of Way Plan [APP-011], which indicates the effects in relation to Great Moulton, Tivetshall St Margaret and Wacton. In addition, Section 3.2 of the Outline Public Rights of Way and Permissive Paths Management Plan [App 203] specifically details promoted walking routes, including Boudicca Way and Via Beata. Temporary closures are proposed where necessary to maintain the safety of members of the public during construction activities. The majority of these effects would be temporary and limited to the period in which works are taking place in the vicinity of the route concerned. While the overall construction programme extends over a 24-month period, many PRoWs

ID	Theme	Representation	Applicant's Response
			associated with the Cable Route Corridor would likely be affected for a period of a few days or weeks while works are undertaken locally and would be reopened following completion of those works. Where a PRow would be affected for a longer duration, temporary diversion routes have been identified. These are set out in Table 4.2 of the Outline Public Rights of Way and Permissive Paths Management Plan [App 203] which identifies the proposed diversion arrangements. These diversions would remain in place only for the duration of the relevant construction activities, following which the affected PRowS would be reinstated and reopened. The interaction between construction activities and users of PRowS, including potential effects on severance, non-motorised user amenity, non-motorised user delay, and fear and intimidation, has been assessed within ES Volume 1, Chapter 11 - Transport and Access of the Environmental Statement [APP-047]. The assessment concluded that, taking account of the proposed mitigation and management measures, the residual effects would be low, negligible or not significant. In addition, Paragraph 5.2 of the Outline Public Rights of Way and Permissive Paths Management Plan [APP-203] identifies three new permissive paths proposed as part of the Scheme. These would provide

ID	Theme	Representation	Applicant's Response
			enhanced opportunities for public access in the vicinity of the Site following construction. The Applicant agrees that the Outline Public Rights of Way and Permissive Paths Management Plan [App 203] is a framework document. This reflects standard DCO practice whereby outline management plans are submitted at the application stage and detailed plans are prepared pursuant to DCO Requirements following consent.
GMAG-189	Outline Employment, Skills and Supply Chain Strategy	GMAG has reviewed the Outline Employment, Skills and Supply Chain Strategy. This document does not provide any quantified workforce profile, peak construction labour demand, non-local worker numbers, accommodation requirements or workforce travel patterns. As a result, the ES contains no evidence-based assessment of workforce traffic, workforce-related community impacts, or the capacity of the local labour market to supply the required skills. The Outline ESSCS is a high-level framework that defers all meaningful detail to a post-consent stage and therefore cannot be relied upon to demonstrate socio-economic benefits or to support the transport assessment.	The Applicant notes the representation regarding workforce-related traffic. Construction worker trips were included within the construction traffic forecasts assessed in ES Volume 1, Chapter 11 - Transport and Access [APP-047], together with construction HGVs and other construction-related vehicle movements. The transport assessment therefore considers the effects of construction traffic associated with the Scheme as a whole, including workforce travel. The likely transport effects associated with construction worker movements have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047]. In ES Volume 1, Chapter 14 – Socio-Economics [APP-050], BRES data on the utility construction workforce is used to provide a realistic estimate of the proportion of the workforce which could originate from

ID	Theme	Representation	Applicant's Response
			the local area and other geographies (shown in Table 14.22). These figures are consistent with the estimates of construction workforce traffic in ES Volume 1, Chapter 11 – Transport and Access [APP-047]. Accommodation requirements are also assessed, with worst-case scenarios considered for both the Construction Phase and Operation and Maintenance Phase; the assessed effects on the temporary accommodation market are Minor Adverse, which is not significant in EIA terms (paragraphs 14.8.36 and 14.8.54 of Chapter 14).
GMAG-190	Transport and Access	11.2 Baseline Transport Context Great Moulton and the surrounding area are served by: • narrow rural lanes • single-track sections • limited passing places • soft verges • sharp bends • restricted visibility • weight-restricted bridges • low-capacity junctions These roads are used daily by:	The Applicant does not agree that the baseline highway conditions have not been adequately described or assessed. ES Volume 1, Chapter 11 - Transport and Access [APP-047] includes a detailed review of the local highway network and considers the characteristics of roads within the study area, existing traffic conditions and the presence of sensitive receptors and non-motorised users. The Applicant acknowledges that parts of the local highway network comprise rural roads with constrained characteristics, including narrow carriageways, limited passing opportunities, bends and restricted visibility. These characteristics were taken into account in the development of the construction traffic routing strategy and in the assessment of construction traffic effects. The assessment also considered the potential effects of the Scheme on sensitive receptors and non-motorised

ID	Theme	Representation	Applicant's Response
		residents • agricultural vehicles • school transport • cyclists • walkers • horse rider The ES does not adequately describe or assess this baseline.	users, including pedestrians, cyclists and horse riders. In accordance with the IEMA Guidelines for Environmental Assessment of Road Traffic, highway links serving sensitive receptors were subject to a greater level of scrutiny within the assessment. Taking account of the proposed mitigation and management measures, the assessment concluded that the residual effects would be low, negligible or not significant. Construction traffic would also be managed in accordance with the Outline CTMP [APP-201], which includes measures designed to maintain highway safety and minimise potential conflicts on constrained sections of the local road network during the construction period.
GMAG-191	Transport and Access Construction	11.3. Deficiencies in the Applicant's Transport Assessment 11.3.1. Missing or Incomplete Traffic Data The ES does not provide: • full traffic counts • peak-hour assessments • seasonal variation data • agricultural traffic baselines • school transport baselines	The Applicant notes the comments regarding the traffic data used within the assessment. ES Volume 1, Chapter 11 - Transport and Access [APP-047] presents the baseline traffic data used within the assessment and identifies both existing and future traffic conditions on the local highway network. Table 11.16 presents the forecast construction traffic conditions in 2029, including future baseline traffic flows with and without the Scheme, together with the percentage change attributable to the Scheme. This represents the worst-case construction traffic scenario assessed. The Applicant also notes the comments regarding peak-hour assessments. As set out in Paragraph 9.3 of Transport Assessment [APP-174 to 177],

ID	Theme	Representation	Applicant's Response
		This results in an unreliable assessment. 11.3.2. Underestimation of Construction Traffic The applicant's own Outline Construction Traffic Management Plan confirms: • 505 daily workers • 116 daily car/LGV/shuttle trips (average) • 205 daily car/LGV/shuttle trips (peak) • 47 daily HGVs (average) • 6G daily HGVs (peak) These figures do not include: • abnormal loads • escort vehicles • crane deliveries • concrete deliveries • cable drum deliveries • subcontractor vehicles • site-to-site movements	construction HGV deliveries and collections would be scheduled between 09:30 and 16:30 to avoid the highway network peak periods. Construction workers would generally arrive between 06:30 and 08:00 and depart between 16:30 and 19:00, thereby avoiding the morning peak period and providing a staggered departure profile during the afternoon period. The Applicant notes the comments regarding seasonal variation. Traffic surveys were undertaken during a neutral survey month, which represents standard transport planning practice and provides a baseline that is representative of typical traffic conditions. The assessment was therefore based on traffic data intended to reflect typical conditions on the local highway network. With regard to agricultural traffic and school transport, these movements would have been captured within the baseline traffic surveys used to inform the assessment. The traffic survey data collected and used within the assessment is summarised in Table 11.10 of ES Volume 1, Chapter 11 - Transport and Access [APP-047]. The Applicant also notes the comments regarding construction traffic generation. Section 5 of ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177] sets out the construction traffic forecasting methodology used within the assessment. The

ID	Theme	Representation	Applicant's Response
		The ES underestimates total traffic volumes.	methodology identifies the vehicle types and movements considered within the assessment and provides the basis for the construction traffic forecasts presented within the ES Volume 1, Chapter 11 - Transport and Access [APP-047] . The Applicant does not agree that trip generation figures do not consider abnormal loads, escort vehicles, crane deliveries, cable drum deliveries, subcontractor vehicles and site-to-site movements. These vehicles with the exception of AILs and their potential escort vehicles are considered inherent within the detailed HGV and car/LGV/shuttle trip generation forecasts. The Applicant notes that AIL movements will consist of a small number of movements that are subject to rigorous management and mitigation regimes undertaken in conjunction with the relevant highway authorities.
GMAG-192	Transport and Access	11.3.3. No Assessment of Abnormal Loads The scheme requires delivery of: - transformers - switchgear - gantries - cable drums - BESS units These require:	The Applicant notes the comments regarding the delivery of Abnormal Indivisible Loads (AILs). The Applicant does not agree that AIL considerations have not been assessed. Potential AIL routing is identified within ES Volume 2: Figure 11.8 - Likely and Suitable Routes to the Scheme [APP-095], while the suitability of the proposed access arrangements for AIL vehicles has been demonstrated through swept path analysis contained within Appendix C of the Transport Assessment [APP-174 to 177]. This includes

ID	Theme	Representation	Applicant's Response
		• abnormal load vehicles • police escorts • road closures • temporary removal of street furniture • verge strengthening The ES does not assess: • abnormal load routing • swept-path analysis • bridge constraints • pinch points • safety risks This is a major omission.	Drawings 333101678-STN-HGN-XX-DR-TR-5500 Sheets 12, 17, 37, 38, 39, 50, 59 and 64, which demonstrate that the proposed AIL vehicles can access the relevant site parcels. The Applicant has liaised with Norfolk County Council and National Highways (NH) regarding potential AIL routes and constraints. The Applicant acknowledges that there are potential AIL constraints. Accordingly, Paragraph 7.3 of the Transport Assessment [APP-174 to 177] explains that temporary mitigation measures and highway works would be required at certain locations to facilitate the movement of transformer and cable drum AILs. These form part of the Highway Works identified within the Works Plans [APP-2.3] and are specifically intended to ensure that AIL vehicles can safely access the Site. The management of AIL movements is further detailed within Section 6.4 of the Outline CTMP [APP-201], which sets out the mitigation measures that would be implemented during AIL movements. These measures include route management, traffic management and other controls necessary for the safe movement of AIL vehicles. 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.

ID	Theme	Representation	Applicant's Response
GMAG-193	Transport and Access Cumulative impact	11.3.4. No Cumulative Construction Assessment The Great Moulton, Tivetshall St Margaret and Wacton cluster includes: • National Grid substation • project substation • BESS • overhead lines • access roads • cable routes • Solar Panels Construction of these elements will overlap, generating: • simultaneous HGV movements • overlapping abnormal loads • multiple construction compounds • cumulative road closures The ES does not assess cumulative impacts.	The Applicant notes the comments regarding cumulative construction effects. The representation refers to cumulative construction effects arising from the different elements of the Scheme. The cumulative assessment presented within the Transport Assessment [APP-074 to 077] relates to the interaction of the Scheme with other committed developments and therefore assesses a different matter to that raised in the representation. The interaction between the various components of the Scheme has nevertheless been considered within the construction traffic assessment. Figure 2.1 of the Outline CTMP [APP-201] presents the construction programme and demonstrates that different elements of the Scheme would be constructed during overlapping periods. The construction traffic assessment presented within ES Volume 1, Chapter 11 - Transport and Access [APP-047] was undertaken using the worst-case construction traffic scenario, representing the period when construction traffic levels are expected to be at their highest. This assessment therefore accounts for the overlap of construction activities associated with the various components of the Scheme, including the solar arrays, BESS, substations, overhead lines, access tracks and cable route corridor. The construction traffic forecasts used within the assessment represent the combined effects of all

ID	Theme	Representation	Applicant's Response
			construction activities anticipated to be taking place during the peak construction period, rather than assessing each element in isolation. As such, the overlap of construction activities across the Scheme has been considered within the assessment.
GMAG-194	Transport and Access	11.3.5. No Assessment of Road Safety Impacts The ES does not assess: • collision risk • pedestrian safety • cyclist safety • horse rider safety • school transport interactions • agricultural vehicle conflicts This is contrary to DfT guidance. 11.3.6. No Assessment of Severance or Community Impacts Construction traffic will cause: • severance of rural communities • delays for residents • disruption to local businesses • impacts on emergency services	The Applicant acknowledges the concerns raised regarding road safety, vulnerable road users and community severance associated with construction traffic. The representation states that road safety, vulnerable road users and severance effects have not been assessed. The Applicant notes that these matters have been considered within the assessment. Existing road safety conditions are assessed within Section 2.7 the Transport Assessment [APP-174 to 177]. Analysis of the recorded accident data did not identify any existing highway safety concerns that would be expected to be exacerbated by the Scheme. Accordingly, significant adverse effects on highway safety were not anticipated. This conclusion reflects both the temporary nature of construction traffic and the comparatively low level of traffic anticipated during operation. Construction traffic would also be managed in accordance with the Outline CTMP [APP-201]. Construction deliveries would be scheduled and monitored to manage vehicle arrivals at site, while

ID	Theme	Representation	Applicant's Response
		impacts on vulnerable road users The ES does not assess these impacts.	temporary traffic management measures, including temporary traffic controls and traffic signals where required, would be implemented to minimise potential conflicts and maintain highway safety on the local road network. With regard to pedestrians, cyclists, horse riders, school transport and other vulnerable road users, please refer to the Applicant's response to Representation GMAG-190. In accordance with the IEMA Guidelines for Environmental Assessment of Road Traffic, highway links serving sensitive receptors and vulnerable users were subject to a greater level of scrutiny within the assessment. Severance during the construction phase is assessed within Paragraph 11.8.11 of ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Cumulative severance effects are also assessed within Paragraph 11.11.10 of the same chapter. Taking account of the proposed mitigation and management measures, these assessments conclude that effects relating to severance would be minor or negligible in magnitude. Accordingly, road safety, vulnerable road users and severance effects have been considered within the assessment and informed the conclusions of the transport assessment.

ID	Theme	Representation	Applicant's Response
GMAG-195	Transport and Access	11.3.7. Misclassification of Construction Duration in the In-Combination Effects Assessment	The Applicant notes the comment regarding traffic and transport, and further detail is provided in GMAG-201 below.
	Construction	ES Chapter 19 classifies all construction-phase effects as “short-term”. This is factually incorrect and inconsistent with the Applicant’s own construction programme, which confirms that the National Grid Substation, Project Substation, BESS compound and associated Great Moulton, Tivetshall St Margaret and Wacton cluster infrastructure will be under construction for 18–24 months. A two-year construction period cannot be described as short-term under the EIA Regulations, NPS EN-1, NPS EN-3, NPS EN-5, DMRB LA 104 or standard EIA practice, where short-term effects are typically defined as days to weeks, and effects lasting more than one year are classified as medium-term. By misclassifying a two-year construction programme as “short-term”, the Applicant has artificially reduced the assessed significance of construction traffic, HGV noise, vibration, severance, pedestrian safety risks, PRow	In relation to transport and access, the assessment presented within ES Volume 1, Chapter 11 - Transport and Access [APP-047] consider construction activities and assesses the effects in alignment with IEMA Guidelines. The Applicant also notes that construction activities across the Scheme will be staggered throughout the programme, as set out in the Outline CTMP [APP-201]. The Transport Assessment [APP 174 to 177] nevertheless adopts a reasonable worst-case scenario, assuming all construction activities occur simultaneously. Even on this basis, the assessment concludes that, alongside the proposed mitigation, effects would not be significant. The Applicant therefore does not agree that the assessment has understated the significance of transport effects.

ID	Theme	Representation	Applicant's Response
		disruption and community impacts. This represents a methodological error and a failure to provide a lawful in-combination effects assessment under Regulation 5(2) and Schedule 4 of the EIA Regulations.	
GMAG-196	Transport and Access Construction	11.4. Construction Traffic Impacts 11.4.1. HGV Movements HGVs will: • damage verges • cause congestion • create safety risks • increase noise and dust • block narrow lanes The ES underestimates these impacts. 11.4.2. Workforce Traffic With 505 daily workers, workforce traffic will: • overwhelm rural lanes • cause peak-hour congestion • increase parking pressure • create safety risks	The Applicant notes the comment regarding traffic and transport, and this is addressed in GMAG-201 below.

ID	Theme	Representation	Applicant's Response
		No mitigation is proposed. 11.4.3. Construction Compounds and Access Roads Construction compounds will: • generate additional traffic • require heavy plant • require material deliveries • create dust and noise The ES does not assess these impacts. 11.4.4. Road Closures and Diversions Abnormal loads and overhead line works will require: • full road closures • diversions • temporary traffic management The ES does not assess: • duration • frequency • cumulative disruption	
GMAG-197	Transport and Access	11.5. Operational Traffic Impacts	The Applicant notes the comment regarding traffic and transport, and this is addressed in GMAG-201 below.

ID	Theme	Representation	Applicant's Response
		Operational traffic includes: • maintenance vehicles • transformer oil deliveries • BESS maintenance • vegetation management • emergency response The ES does not assess: • operational access constraints • emergency access requirements • cumulative operational impacts	
GMAG-198	Transport and Access	11.6. Impacts on Vulnerable Road Users The scheme will affect: • walkers • cyclists • horse riders • school children • elderly residents The ES does not assess: • safety risks	The Applicant notes the comment regarding traffic and transport, and this is addressed in GMAG-201 below.

ID	Theme	Representation	Applicant's Response
		• severance • loss of amenity • increased traffic stress	
GMAG-199	Transport and Access Policy compliance	11.7. Policy Non-Compliance The scheme does not comply with: • NPS EN-1 (transport, safety, cumulative effects) • NPS EN-3 (construction traffic for solar and BESS) • NPS EN-5 (abnormal loads for substations) • EIA Regulations (baseline, cumulative effects) • DfT guidance • Norfolk County Council standards The applicant has not demonstrated that impacts have been minimised or mitigated.	The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies. The Applicant has demonstrated that impacts have been assessed and mitigated, and this is addressed in GMAG-201 below. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.
GMAG-200	Transport and Access	11.8. Omission of Water-Tanker Movements The Water Resources Assessment (Appendix 9.3) confirms that water tankering will be required during	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

ID	Theme	Representation	Applicant's Response
	Water Environment	construction and operation, particularly during dry months and for the removal of contaminated firewater or runoff. However, no tanker movements are included in the Transport Assessment, Outline CTMP or OTMP. No assessment has been undertaken of tanker routing, frequency, peak-hour impacts, safety on narrow rural lanes, or cumulative effects with other construction traffic. This omission renders the traffic modelling incomplete and non-compliant with Regulation 14 of the EIA Regulations, as the ES has not assessed a likely significant effect of the development.	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] .
GMAG-201	Transport and Access	11.9. Conclusions and Planning Weight GMAG submits that the transport and access assessment is incomplete, inconsistent and not compliant with the EIA Regulations, NPS EN-1, EN-3, EN-5, DfT guidance or Norfolk County Council highway standards. The ES does not assess the scheme as currently proposed, does not include abnormal load routing, does not evaluate cumulative construction traffic,	The Applicant notes the comments regarding the transport and access assessment. The Applicant does not agree that the assessment is incomplete or that matters such as AIL movements, road safety, severance, cumulative effects, vulnerable road users or construction traffic have not been assessed. These matters are assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047], supported by the Transport Assessment [APP-

ID	Theme	Representation	Applicant's Response
		and does not assess road safety, severance or community impacts. As a result, the ES does not provide the Examining Authority with the information required to understand the scale, extent or significance of transport impacts arising from the development. The scheme would result in: • severe construction traffic impacts on a constrained rural road network • high volumes of HGVs, LGVs, workforce vehicles and subcontractor traffic • unassessed abnormal load movements requiring escorts, closures and diversions • significant road safety risks for pedestrians, cyclists, horse riders and school transport • damage to verges, carriageways and rural lanes not designed for heavy vehicles • community severance and disruption to daily life for residents	174 to 177], Outline CTMP [APP-201] and Outline OTMP [APP-202]. The Transport Assessment [APP-174 to 177] was undertaken in accordance with IEMA Guidelines and included assessment of severance, delay, amenity, fear and intimidation, road safety, hazardous and large loads, PRoW users and cumulative effects. Where relevant thresholds were exceeded, further detailed assessment was undertaken. The assessment adopts a reasonable worst-case scenario, assuming all construction activities across the Scheme occur simultaneously. In practice, construction activities would be staggered across the programme. The Outline CTMP [APP-201] is supported by forecasts of vehicle trip generation, routeing strategies, AIL routeing, access assessments and traffic management measures. The detailed Construction Traffic Management Plan, substantially in accordance with the Outline CTMP [APP-201], will be secured through the Requirements of the Draft DCO [AS-032] and approved in consultation with NCC as the Local Highway Authority prior to construction. A management measure detailed in the Outline CTMP [APP-201] includes pre and post construction road condition surveys, whereby any damage to the road service reasonably attributable to the Scheme will be

ID	Theme	Representation	Applicant's Response
		cumulative construction impacts from simultaneous works across the Great Moulton, Tivetshall St Margaret and Wacton cluste These impacts are substantial, adverse and unavoidable due to the scale of the construction programme, the number of workers required, the volume of materials to be transported, and the physical constraints of the rural road network. The applicant has not demonstrated that these impacts can be mitigated to an acceptable level, nor that the network can safely accommodate the required vehicle movements. GMAG has also reviewed the applicant's Outline Construction Traffic Management Plan and Outline OTMP. Neither document constitutes an assessment of construction or operational traffic impacts. Both are high-level frameworks that defer all meaningful analysis to post-consent stages and contain no junction capacity modelling, no assessment of safety risks on narrow rural lanes, no analysis of impacts on vulnerable road users, no quantified assessment of noise, air	rectified by the Applicant to the suitability of the Local Highway Authority. Other proposed measures include avoidance of routeing HGVs during peak periods, use of holding areas and call forward to site, designated routes for construction vehicles, and staff shuttle services. These measures are designed to minimise effects on the local road network such as any effects relating to congestion, safety and road user amenity. Site access design, swept-path analysis, and visibility splays have also been prepared to determine suitability for access, alongside an AIL report shown in Appendix C and D of the Transport Assessment [APP-174 to 177]. The Applicant therefore considers that the likely transport and access effects of the Scheme have been robustly assessed and that an appropriate framework is in place to secure the mitigation measures identified through the ES.

ID	Theme	Representation	Applicant's Response
		quality or severance effects, and no cumulative assessment of construction and replacement activities across the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster. As such, these outline plans do not remedy the deficiencies of the ES and cannot be relied upon in the planning balance. GMAG has also reviewed the Outline Employment, Skills and Supply Chain Strategy, which provides no quantified workforce profile, peak labour demand, non-local worker numbers or workforce travel patterns, and therefore offers no evidence to support the ES's assessment of workforce traffic or cumulative construction impacts. Planning Weight: Given the absence of abnormal load assessment, the underestimation of construction traffic, the omission of key receptors, the failure to assess road safety, and the complete lack of cumulative construction modelling, GMAG submits that substantial negative weight must be attached to the transport and access impacts of the scheme. The ES, as submitted, does not meet the	

ID	Theme	Representation	Applicant's Response
		requirements of Regulation 14 and cannot lawfully support a grant of development consent. Until a complete, accurate and regulation-compliant transport assessment is provided, the applicant's transport case carries very limited weight in the planning balance.	
GMAG-202	Soils and Agriculture	Agricultural Land and Soils 12.1. Introduction and Summary of Concerns GMAG has significant concerns regarding the loss of agricultural land and the impacts on soil quality arising from the proposed development. The site comprises predominantly Grade 2 agricultural land, which is classified as Best and Most Versatile (BMV) under the Agricultural Land Classification (ALC) system. BMV land is a nationally important resource, protected under planning policy due to its high productivity, versatility and contribution to food security. The Environmental Statement (ES) significantly underestimates the scale and permanence of agricultural land loss. The applicant has not	The Site comprises a mixture of agricultural land quality as set out in the Agricultural Land Classification (ALC) report ES Volume 3, Appendix 15,1 0 Agricultural Land Classification Report [APP-182] and the ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. As set out in ES Volume 1, Chapter 15 - Soils and Agricultural Land Table 15.6, 37.7% of Parcels 1 – 10 is Grade 2, 41.0% is Subgrade 3a, and the rest is poorer quality land or non-agricultural. As set out in ES Volume 1, Chapter 15 - Soils and Agricultural Land.3, policy does not require that BMV land is "unavoidable". In Norfolk the Predictive Agricultural Land Classification Map for England, published since the ES was published, shows most of Norfolk (estimated to be about 94%) to be predicted to be of BMV quality. Therefore for any energy development of this nature there will be a need to use land of BMV quality. The ALC results show that the land quality identified by detailed field survey is typical of the wider area.

ID	Theme	Representation	Applicant's Response
		demonstrated that the use of BMV land is unavoidable, nor have they assessed alternative locations on lower-grade land. Soil handling, compaction, drainage impacts and long-term soil degradation have not been assessed. The ES does not comply with: • NPS EN-1 (protection of BMV land) • NPPF (paragraphs on agricultural land and food security) • EIA Regulations (baseline, cumulative effects) • Defra ALC guidance • Construction Code of Practice for the Sustainable Use of Soils The scheme would result in: • permanent loss of BMV land • irreversible soil degradation • compaction and drainage impacts • loss of agricultural productivity • cumulative land-take from the Great Moulton, Tivetshall St Margaret and Wacton cluster	Policy in NPS EN-1, EN-3 and the NPPF (updated August 2026) does not prohibit the use of land of BMV quality. As set out in the ES, most of the land will be unaffected by the installation of the solar PV panels and the areas of land that are affected are modest. The EIA regulations and guidance such as the ISEP Guide have been followed in the assessment, and the Defra Construction Code of Practice is fully referenced. The Scheme will result in the permanent loss of agricultural land for the N G substation and for some tree planting, as set out in Chapter 15, but for the majority of the scheme there will be no adverse effects on soils or land quality, see ES Volume 1, Chapter 15 - Soils and Agricultural Land 15.8.62 et seq. Soils will not degrade but will generally benefit from being rested from intensive arable use, as described in 15.8.93 to 102, and water will penetrate below the panels. Compaction risks at construction and decommissioning will be minimised by adherence to good practice, and a SRMP will be produced, an outline of which is submitted Outline SRMP [APP-204]. Agricultural productivity is not a requirement of the use of agricultural land, and there are no policies that seek to increase production. There will be the potential for continued production in any event as there is the potential for the grazing of sheep. The potential effects on production are assessed in the ES Volume 1,

ID	Theme	Representation	Applicant's Response
		GMAG submits that the agricultural land assessment is incomplete, inconsistent and insufficient to support a lawful decision.	Chapter 15 - Soils and Agricultural Land [APP-051] , as are cumulative effects and the implications for food production. There will be a negligible effect on food production.
GMAG-203		12.2. Agricultural Land Classification (ALC) Baseline The site comprises: • predominantly Grade 2 land • pockets of Grade 3a land • small areas of Grade 3b land Grade 2 and Grade 3a land are both BMV. BMV land is defined as: “Land which is most flexible, productive and efficient in response to inputs, and which can best deliver future crops for food and non-food uses.” The ES does not provide: • a full ALC survey • soil profile descriptions • drainage characteristics • soil texture and structure analysis • assessment of long-term soil resilience	Parcels 1 – 10 comprise 37.7% Grade 2 (ES Volume 1, Chapter 15 - Soils and Agricultural Land Table 15.6 [APP-051]). The matters raised as omissions are all contained within the full ALC survey ES Volume 3, Appendix 15,1 0 Agricultural Land Classification Report [APP-182] [AS-010] and ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]. The Site comprises a mixture of agricultural land quality as set out in the Agricultural Land Classification (ALC) report [APP-182] and the ES Volume 1 Chapter 15 [APP-051]. As set out in ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] Table 15.6, 37.7% of Parcels 1 – 10 is Grade 2, 41.0% is Subgrade 3a, and the rest is poorer quality land or non-agricultural.

ID	Theme	Representation	Applicant's Response
		This is a major omission.	
GMAG-204	Soils and Agriculture	12.3. Deficiencies in the Applicant's Agricultural Land Assessment 12.3.1. No Justification for Using BMV Land NPS EN-1 requires applicants to: • avoid BMV land where possible • demonstrate that alternatives have been considered • justify any loss of BMV land The applicant has not: • assessed alternative sites • assessed lower-grade land • justified the selection of Grade 2 land • demonstrated that BMV loss is unavoidable This is contrary to national policy.	The Site Selection Assessment [APP-215] provides detail on the site selection and agricultural land quality was a key consideration, as described in that document. At the time the only information published was the provisional ALC maps which showed the area to be mostly Grade 3, and the predictive likelihood of BMV maps which showed most of the area to be in the moderate likelihood of BMV, with very few areas shown as low likelihood. As presented in ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051], in Norfolk the Predictive Agricultural Land Classification Map for England, published since the ES was published, shows most of Norfolk to be predicted to be of BMV quality. Land quality was a clear consideration in site selection, and the use of higher-grade land has been justified. As set out in ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051], policy does not require that BMV land is "unavoidable".
GMAG-205	Soils and Agriculture	12.3.3. No Assessment of Soil Compaction and Degradation Construction will involve: • heavy plant	The components of the construction process are set out in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051]. The potential for all these effects is assessed in detail in Chapter 15, including potential effects on soils, infiltration, run-off and soil productivity.

ID	Theme	Representation	Applicant's Response
		• cranes • HGVs • soil stripping • stockpiling • trenching These activities cause: • compaction • loss of soil structure • reduced infiltration • increased runoff • long-term productivity loss The ES does not assess these impacts.	The use of these machines for the construction is recognised, but larger items of machinery are used only in limited areas (e.g. the substations) and after access roads have been constructed. For the majority of the installation there is limited need for traffic across land, and that will be undertaken when ground conditions are suitable as set out in ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] and the outline SRMP. This will be controlled by a detailed SRMP as a DCO Requirement. The potential for compaction, effects on soil structure, infiltration in the panel areas, and run-off are all considered in Chapter 15, and no significant adverse effects are identified. There will be no long-term productivity loss. The soils will benefit from being rested from intensive arable use, although those benefits will be lost once arable use resumes, but the land will be of the same soil type and grade with no diminution in quality or characteristics. Detailed advice for those small areas disturbed is set out in the assessment and will be controlled by good practice in the SRMP, to ensure that even in those areas the land will restore to comparable quality and utility on decommissioning.
GMAG-206	Soils and Agriculture	12.3.4. Misclassification of Construction Duration	In terms of the construction effects on soils, the assessment has considered the construction period of 18 – 24 months. It is likely that the works for particular areas within each cluster (e.g. panel installation) will be

ID	Theme	Representation	Applicant's Response
	Construction	ES Chapter 19 classifies all construction-phase effects on agricultural land and soils as “short-term”. This is inconsistent with the Applicant's own construction programme, which confirms that the National Grid Substation, Project Substation, BESS compound and associated Great Moulton, Tivetshall St Margaret and Wacton cluster infrastructure will be under construction for 18–24 months. A construction period of this duration cannot be described as short-term under DEFRA guidance, MAFF soil handling protocols or standard EIA practice, where effects lasting more than one year are categorised as medium-term. This misclassification artificially reduces the assessed significance of soil compaction, structural damage, loss of soil function, and long-term recovery times.	shorter duration than the assessment for the cluster as a whole. The ES Volume 1, Chapter 2 - EIA Methodology [APP-038] defines short and medium term impacts, with medium term defined as 1 to 5 years. ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] assesses the effects on agricultural land and soils and as described in 15.5.19, where an impact is temporary and reversible, it is defined as a low magnitude impact for assessment purposes following the ISEP Guide. Therefore whether this is described as “short-term” or “medium-term” does not alter the assessment, as set out in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051] and the Outline Soil Management Plan (oSMP) [APP—204]. These effects are all low magnitude as they are reversible without loss or diminution of land quality.
GMAG-207	Soils and Agriculture	12.3.5. No Soil Handling or Protection Plan The ES does not include: • a Soil Management Plan	These matters are addressed in the following documents: • ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051];

ID	Theme	Representation	Applicant's Response
		• topsoil/subsoil separation measures • soil storage protocols • reinstatement methods • monitoring proposals This is contrary to Defra guidance.	• Outline Soil Management Plan [APP-204].
GMAG-208	Soils and Agriculture Water Environment	12.3.6. No Assessment of Drainage Impacts on Agricultural Land The introduction of: • hardstanding • access roads • substations • BESS compounds will alter: • infiltration • runoff • soil moisture • drainage patterns The ES does not assess these impacts.	As set out in Section 8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018], solar panels installed within the Scheme will be raised up on narrow pile-driven supports which have a negligible impermeable area and will allow overland flows to flow beneath the panels. Solar panel freeboards have been specified and secured within the Design Principles, Parameters and Commitments [APP-213] to ensure that solar panels are raised at a suitable height above any anticipated surface water flood depths. The proposed use across the Order Limits is predominantly solar panels. The ground across the panel fields will consist of a grass and/or wildflower meadow maintained at a suitable height as secured in Outline LEMP [APP-996]. The provision of this grass cover all year round will significantly improve soil stabilisation and as studies have shown that grass cover has a higher roughness coefficient than bare soil or agricultural use and therefore slows down the rate of runoff flowing down the fields.

ID	Theme	Representation	Applicant's Response
			Solar panels will be PFAS free and will be cleaned with distilled water as outlined in section 8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] and secured through the Design Principles, Parameters and Commitments [APP-213]. As such, the solar panel element of Scheme will not give rise to significant contamination issues to water receptors. As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] (with detailed design secured through DCO Requirement 11), the BESS and Substations will have surface water drainage systems which will be lined with an impermeable membrane to prevent runoff from these areas from percolating through to the strata beneath. Commitment is also made in the Design Principles, Parameters and Commitments [APP-213] to the provision of swales and filter drains for access track drainage. These potential agricultural impacts are assessed in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051] in particular sections 15.8.93 to 15.8.102. There will be no significant adverse effects.
GMAG-209	Soils and Agriculture	12.4 Impacts on Agricultural Productivity 12.4.1. Permanent Loss of BMV Land	These potential effects are all considered in ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-

ID	Theme	Representation	Applicant's Response
		The Great Moulton, Tivetshall St Margaret and Wacton cluster alone would permanently remove: • high-quality arable land • productive soils • agricultural employment potential This loss is irreversible. 12.4.2. Fragmentation of Agricultural Holdings The scheme would: • sever field units • disrupt farm operations • reduce efficiency • increase operational costs The ES does not assess these impacts.	051], including effects on agricultural land and farm businesses. The potential for permanent loss from construction is assessed and quantified in sections 15.8.5 to 15.8.66, with soils assessed in 15.8.67 to 72. Effects of farm and farming activities, severance and labour are assessed in 15.8.103 et seq. There are farm reports in ES Volume 3, Appendix 15.2 - Farm Reports [APP-183]. The Scheme will not sever farm units with the alleged consequential effects.
GMAG-210	Soils and Agriculture	12.4.3. Long-Term Soil Degradation Soil degradation may include: • compaction • reduced organic matter • reduced fertility • impaired drainage	See ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051]. All of these potential impacts are considered. No significant adverse effects will result. ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] at 15.8.93 et seq in particular considers the effects of the operational phase on compaction, drainage and soils fertility and quality, and

ID	Theme	Representation	Applicant's Response
		erosion The ES does not assess long-term impacts.	concludes that soils will benefit from being rested from intensive arable activities. There will be grassland cover so erosion from bare soils will reduce. There will be no long-term or permanent adverse effects on soils.
GMAG-211	Soils and Agriculture Cumulative impact	12.5. Cumulative Agricultural Land Impacts The cumulative land-take from: - the National Grid substation - the project substation - the BESS - access roads - cable routes - construction compounds creates a large, permanent industrial footprint. The ES does not assess cumulative agricultural land loss.	ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051] Table 15.14 assesses the cumulative impact. The table sets out the areas affected temporarily, permanently and (worst-case) potentially permanently. Paragraphs 15.8.62 to 66 describe and assess these effects, including from tree planting. The worst-case assessment is that there will be a permanent loss for the N G Substation, tree planting, track construction and the BESS and Project Substations of 37.9ha, but this will be spread across the Order Limits rather than in a cluster. The likely loss is 15.1ha of BMV for the N G Substation and the tree planting (9.0 ha across the Order Limits).
GMAG-212	Soils and Agriculture Cumulative impact	Cumulative Loss of Arable Land Across Norfolk The ES does not assess the cumulative loss of agricultural land across Norfolk arising from multiple solar, BESS and grid-related NSIPs. Norfolk contains one	ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051] section 15.11 provides this assessment. The wider food and economic effects are assessed in 15.8.108 to 15.8.130, and cumulative effects are assessed in section 15.11. Norfolk has an estimated

ID	Theme	Representation	Applicant's Response
		of the largest concentrations of Grade 2 and Grade 3a Best and Most Versatile (BMV) land in England, and is a nationally significant food-producing county. The loss of BMV land at Great Moulton must therefore be considered in the context of wider regional land pressures, including other large-scale solar and grid projects proposed or consented within South Norfolk, Breckland, Broadland and West Norfolk. The applicant has not provided any assessment of cumulative BMV loss at county or regional scale, despite national policy requiring decision-makers to consider the strategic implications of agricultural land loss for food security. This omission significantly understates the true scale of harm.	farmable area of 479,000ha as set out in 15.8.110. Over 20,000ha is currently uncropped (15.8.109). Food production is a matter for national rather than regional or local assessment and has been considered in Chapter 15. The effect will be negligible.
GMAG-213	Soils and Agriculture Policy compliance	12.6. Policy Non-Compliance The scheme does not comply with: • NPS EN-1 (protection of BMV land) • NPPF (food security, agricultural land protection) • EIA Regulations (baseline, cumulative effects)	The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies. ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] considers all of these documents. For energy development of this nature there will be a need to use land of BMV quality. The ALC results show

ID	Theme	Representation	Applicant's Response
		- Defra ALC guidance - Construction Code of Practice for the Sustainable Use of Soils The applicant has not demonstrated that agricultural land impacts have been minimised or mitigated.	that the land quality identified by detailed field survey is typical of the wider area Policy in NPS EN-1, EN-3 and the NPPF (updated August 2026) does not prohibit the use of land of BMV quality. As set out in the ES, most of the land will be unaffected by the installation of the solar PV panels and the areas of land that are affected are modest. The EIA regulations and guidance such as the ISEP Guide have been followed in the assessment, and the Defra Construction Code of Practice is fully referenced. The Applicant considers it is fully compliant with the EIA Regulations.
GMAG-214	Soils and Agri	12.7. Conclusions and Planning Weight GMAG submits that the agricultural land and soils assessment is incomplete, inconsistent and not compliant with the EIA Regulations, NPS EN-1, the NPPF, Defra ALC guidance or the Construction Code of Practice for the Sustainable Use of Soils. The ES does not provide a full Agricultural Land Classification survey, does not assess soil structure, drainage or long-term soil resilience, and does not evaluate the cumulative land take arising from the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster. As a	The Applicant notes the comments raised by GMAG. The Applicant draws attention to the fact that these matters are addressed within the Application material and have been assessed in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-052], supported by ES Volume 3, Appendix 15.1 – Agricultural Land Classification Report [APP-186] and the Outline Soil Resource and Management Plan (Outline SRMP) [APP-204]. The assessment has been undertaken by appropriately qualified experts, as set out in ES Volume 3, Appendix 1.2 – Statement of Expertise [APP-112], and has had regard to the EIA Regulations, NPS EN-1, NPS EN-3, the NPPF, Defra ALC guidance, the Defra Construction Code of Practice for the Sustainable Use of Soils on

ID	Theme	Representation	Applicant's Response
		result, the ES does not enable the Examining Authority to understand the scale, extent or significance of agricultural land loss or soil degradation arising from the development. The scheme would result in: • the permanent and irreversible loss of extensive areas of Grade 2 and Grade 3a Best and Most Versatile (BMV) agricultural land • long-term soil degradation through compaction, disturbance, altered drainage and fragmentation of agricultural holdings and disruption to farm operations • loss of productive capacity and contribution to local and national food security • cumulative land take from the colocation of substations, BESS, access roads, cable routes and construction compounds These impacts are substantial, adverse and long-lasting. BMV land is a nationally important resource, and national policy requires applicants to	Construction Sites, and the ISEP guidance 'Solar PV on Agricultural Land: Essential components of Environmental Statements and Reports' (2025).

ID	Theme	Representation	Applicant's Response
		avoid its loss wherever possible and to demonstrate that no reasonable alternative exists. The applicant has not demonstrated that the use of BMV land is unavoidable, nor that lower-grade land has been properly assessed. The permanent industrialisation of high-quality agricultural land is therefore contrary to national policy and cannot be justified on the basis of the evidence provided.	
GMAG-215	Landscape and Visual Noise and Vibration Lighting	Residential Amenity 13.1. Introduction and summary of concerns GMAG has serious concerns regarding the impacts of the proposed development on residential amenity. The Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster — comprising a 400kV National Grid substation, a second project substation, a large BESS compound, overhead lines, gantries, access roads and security lighting — is located immediately adjacent to homes on the southern edge of Great Moulton.	The Applicant does not agree that the Scheme is in conflict with the National Policy. The Applicant's position on the Scheme's compliance with NPS EN-1, EN-3, and EN-5 is set out within the Policy Compliance Document [APP-210]. The Applicants position on the overall planning balance, with regard to the NPS is set out within the Planning Statement [APP-209]. The Applicant's Statement of Need [APP-206] provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. Further, Section 4.3 of the Statement of Need [APP-

ID	Theme	Representation	Applicant's Response
		The Environmental Statement (ES) significantly underestimates these impacts. Key receptors are missing, the assessment is based on outdated scheme parameters, and the applicant has not assessed the combined effects of noise, lighting, visual dominance, construction disturbance, traffic, and loss of outlook. The ES does not comply with: • NPS EN-1 (residential amenity, noise, lighting, human health) • NPS EN-3 (BESS noise, safety and amenity) • NPS EN-5 (substation noise, visual impacts, EMF) • EIA Regulations (assessment of likely significant effects) • NPPF (protection of residential amenity) The scheme would result in: • loss of rural outlook • industrialisation of residential boundaries	206] explains that current levels of national electricity demand are expected to double (NPS EN-1, Para. 2.3.7) to electrify non-traditional demand sectors, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 (Clean Power 2030 Action Plan, Page 11). This underpins the need for the Scheme and for other schemes to come forward to meet current and future electricity demand. The Applicant acknowledges that the Scheme would introduce changes to the landscape and visual amenity. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. The Applicant addresses comment with regards to residential visual amenity in GMAG-122 above, and GMAG-217 below, traffic and transport in GMAG-216 below, lighting in GMAC-165, and noise and vibration in GMAC-149-159. Regarding the interrelationships between environmental effects, ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects

ID	Theme	Representation	Applicant's Response
		- continuous operational noise - night-time lighting impacts - construction disturbance - traffic and access disruption - loss of tranquillity - cumulative amenity harm GMAG submits that the residential amenity assessment is incomplete, inconsistent and insufficient to support a lawful decision.	from other environmental topics. Section 19.2 details the methodology utilised for the in-combination effects assessment.
GMAG-216	Landscape and Visual Noise and Vibration Lighting Transport and Access	13.2. Baseline Residential Environment Homes on: - Frith Way - Station Road - Woodrow Lane - Low Road - The Stree currently enjoy: - open rural views - dark skies	The Applicant addresses this comment with regards to residential visual amenity in GMAG-122 above. In addition, the visual baseline including relevant residential properties is defined in ES Volume 1 Chapter 7 - Landscape and Visual [APP-043] and ES Volume 3 Appendix 7.4 - Visual Baseline [APP-121] Construction traffic effects have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047] and have been prepared in alignment with IEMA Guidelines and thresholds. Construction traffic routes were developed to minimise effects on sensitive receptors and residential communities wherever practicable and have been informed by ongoing consultation with Norfolk County Council as the Local Highway Authority. The Outline CTMP [APP-201]

ID	Theme	Representation	Applicant's Response
		- low background noise - agricultural landscape setting - high levels of tranquillity - no industrial activity - no night-time lighting - no continuous mechanical noise This baseline is highly sensitive to change. The ES does not adequately describe or assess this baseline.	includes a range of management and mitigation measures to reduce the effects of construction traffic, including designated routes, delivery scheduling, vehicle booking systems and temporary traffic management measures where required. The Applicant addressed this comment with regards to noise and vibration in GMAC-149-159. The Applicant addressed this comment with regards to lighting in GMAC-165.
GMAG-217	Landscape and Visual Noise and Vibration Lighting Transport and Access	13.3. Deficiencies in the Applicant's Residential Amenity Assessment 13.3.1. Missing Residential Receptors The ES omits several homes that are: - closest to the Great Moulton, Tivetshall St Margaret and Wacton cluster - directly affected by visual dominance - directly affected by noise and lighting - directly affected by construction traffic	The Applicant has prepared a Residential Visual Amenity Assessment (RVAA), as presented in ES Volume 2, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148]. The RVAA has been undertaken in accordance with the Landscape Institute's Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (2019). Having regard to the characteristics of the Scheme and the surrounding landscape context, the Applicant determined that a 100m study area from the nearest Scheme component represented an appropriate and proportionate basis for identifying properties requiring detailed RVAA consideration. This approach is consistent with the Landscape Institute guidance and

ID	Theme	Representation	Applicant's Response
		This omission is significant and undermines the assessment.	reflects professional judgement based on the specific circumstances of the Scheme. The purpose of an RVAA is not to identify all properties from which the development may be visible. It is intended to determine whether the scale and proximity of a development would result in residential visual amenity being affected to such an extent that the property would become an unattractive place in which to live, through effects described as visually overbearing, overwhelming or oppressive. Properties excluded from the 100m RVAA study area are considered unlikely to meet the RVA threshold. The Applicant acknowledge that there will likely to be visual effect on some residential properties outside of the 100m RVAA study area. These are assessed in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] through representative view location from publicly accessible location. The Applicant addresses this comment with regards to traffic in transport in GMAG-216 above. The Applicant addressed this comment with regards to lighting in GMAC-165. The Applicant addressed this comment with regards to noise and vibration in GMAC-149-159

ID	Theme	Representation	Applicant's Response
GMAG-218	Scheme Description Design Principles, Parameters and Commitments	13.3.2. Assessment Based on Outdated Scheme Parameters The residential amenity assessment appears to pre-date the escalation to a 400kV National Grid substation. As a result, it does not reflect: - the true height and massing of 400kV equipment - the enlarged BESS compound - the increased number of transformers - the increased lighting requirements - the cumulative massing of two substations This renders the assessment unreliable.	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation The LVIA presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] considers the maximum Scheme parameters submitted as part of the Application, as do other environmental topics, consistent with the Rochdale envelope approach.
GMAG-219	Landscape and Visual	13.3.3. No Assessment of Loss of Outlook Residents will experience: - loss of open rural views - replacement of fields with industrial infrastructure - dominance of gantries, transformers and fencing	Residential Visual Amenity Assessment (RVAA), as presented in ES Volume 2, Appendix 7.8 [APP-148] has been undertaken in accordance with the Landscape Institute's Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (2019). The aim is to identify those properties that meet the Residential Visual Amenity Threshold judgement. An assessment of overbearing or oppressive effects has not been undertaken, as no residential properties

ID	Theme	Representation	Applicant's Response
		permanent change to the character of their homes The ES does not assess loss of outlook.	were identified as meeting the RVAA assessment thresholds. The overall landscape and visual effect of the Scheme are presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], which considers effects to visual amenity and potential loss of outlook.
GMAG-220	Lighting	13.3.4. No Assessment of Night-Time Lighting The ES does not assess - operational lighting - security lighting - BESS lighting - substation maintenance lighting - skyglow - light spill into homes and gardens This is a major omission.	Please refer to GMAG-117.
GMAG-221	Noise and Vibration	13.3.5. No Assessment of Noise Impacts on Residents The ES does not assess - low-frequency transformer hum - tonal noise	The Applicant addressed this comment with regards to noise and vibration in GMAC-149-159.

ID	Theme	Representation	Applicant's Response
		• BESS cooling systems • cumulative noise from the Great Moulton, Tivetshall St Margaret and Wacton cluster • night-time noise impacts • sleep disturbance This is contrary to BS 4142 and BS 8233.	
GMAG-222	Construction Transport and Access Air Quality Noise and Vibration	13.3.6. No Assessment of Construction Impacts Construction will involve • heavy plant • cranes • HGVs • piling • concrete pouring • cable trenching • dust and vibration The ES does not assess: • construction noise • construction vibration	Traffic effects, including an assessment cumulative effects, have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047] in alignment with IEMA Guidelines. Associated mitigation and traffic management measures are set out alongside an indicative construction programme within the Outline CTMP [APP-201]. The assessment makes a worst-case assumption of all sites being active simultaneously, whereas in reality construction activities will be staggered across the programme. A detailed CTMP, substantially in accordance with the Outline CTMP [APP-201], will be secured through the Requirements of the Draft DCO [AS-032] and approved in consultation with the relevant authorities prior to construction. Air quality effects resulting from road traffic emissions during the construction phase have been assessed within ES Volume 1, Chapter 13 – Air Quality [APP-

ID	Theme	Representation	Applicant's Response
		• construction traffic impacts • duration and phasing • cumulative construction disturbance	049] in accordance with EPUK & IAQM guidance. An assessment of the risk of construction dust impacts to determine appropriate mitigation for inclusion in the Outline CEMP [APP-196] is provided in ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment. Mitigation to control dust emissions during construction are provided in the Outline CEMP [APP-196]. Noise and vibration effects from construction are assessed within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The duration of impacts are considered when determining the significance. Cumulative effects from construction noise are considered within Section 12.11 of ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Mitigation to control noise and vibration during construction are provided in the Outline CEMP [APP-196]. A detailed CEMP, substantially in accordance with the Outline CEMP, is secured by Requirement 13 of the Draft DCO [AS-032].
GMAG-223	Construction	13.3.7. Misclassification of Construction Duration The ES repeatedly labels construction-phase effects on residential amenity as “short-term”, despite the Applicant’s own	Responses on this point have been provided in relation to each topic throughout the Applicant’s response including at GMAG-119, GMAG-163, GMAG-195, GMAG-206 and GMAG-271.

ID	Theme	Representation	Applicant's Response
		programme confirming a two-year construction period for the Great Moulton, Tivetshall St Margaret and Wacton cluster. Multi-year construction cannot be described as short-term under WHO, BS 5228 or standard EIA practice. This misclassification suppresses the true scale of harm to residential amenity, including prolonged noise, lighting, traffic disturbance, visual intrusion and loss of tranquillity.	
GMAG-224	Landscape and Visual	13.4. Visual Amenity Impacts 13.4.1. Dominance of the Great Moulton, Tivetshall St Margaret and Wacton Cluster The Great Moulton, Tivetshall St Margaret and Wacton cluster includes: • a 400kV substation • a second substation • a large BESS compound • overhead lines • gantries • fencing • lighting	ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] presents an assessment of the likely effects of the BESS, Project Substations and the National Grid Substation. The Design Principles, Parameters and Commitments [APP-213] includes a commitment for the BESS, National Grid Substation and Project Substations, that whilst the exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction, the colour will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape. Further the Design Principles, Parameters and Commitments [APP-213] includes a minimum set back of this infrastructure from the Public Rights of Way.

ID	Theme	Representation	Applicant's Response
		- Solar Panels This will create: - a dominant industrial complex - visible from homes year-round - with no meaningful screening - at close proximity to residential boundaries The ES underestimates these impacts.	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 woodland belts and native tree planting provide screening to the Scheme as well as improves biodiversity and supports green infrastructure connectivity. Hedgerow reinforcement as detailed in the Outline LEMP [APP-199] is proposed along existing features to restore these and aid visual screening, together with new hedgerow creation along the proposed Public Rights of Way. Collectively these proposed measures aim to reinforce existing vegetation across the landscape.
GMAG-225	Landscape and Visual	13.4.2. Loss of Rural Outlook Residents will lose: - open agricultural views - hedgerow and field patterns - rural landscape character These will be replaced with: - steel structures - transformers - gantries	A detailed landscape and visual assessment are reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the Design Approach Document [APP-212]. A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing

ID	Theme	Representation	Applicant's Response
		- lighting columns - fencing This represents a significant loss of amenity	existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032]. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
GMAG-226	Noise and Vibration	13.5. Noise Impacts on Residential Amenity 13.5.1. Continuous Operational Noise Residents will experience: - continuous transformer hum - tonal noise - low-frequency noise	The Applicant addressed this comment with regards to noise and vibration in GMAC-149-159.

ID	Theme	Representation	Applicant's Response
		• BESS cooling noise • auxiliary equipment noise The ES does not assess these impacts. 13.5.2. Night-Time Noise and Sleep Disturbance Night-time noise limits are lower due to increased sensitivity. The ES does not assess • night-time noise levels • sleep disturbance • internal noise levels This is a major omission.	
GMAG-227	Lighting	13.6. Lighting Impacts on Residential Amenity 13.6.1. Light Spill into Homes and Gardens Lighting will cause • skyglow • glare • light spill • loss of dark skies	The Applicant addressed this comment with regards to lighting in GMAC-165.

ID	Theme	Representation	Applicant's Response
		The ES does not assess these impacts. 13.6.2. Loss of Dark-Sky Conditions Great Moulton currently enjoys: • low lighting levels • dark skies • minimal artificial illumination The scheme will introduce • permanent night-time lighting • industrial lighting columns • security lighting This represents a fundamental change to residential amenity.	
GMAG-228	Construction Noise and Vibration Transport and Access Air Quality	13.7. Construction Impacts on Resident Construction will cause: • noise • vibration • dust • traffic • road closures • visual intrusion	Traffic effects, including cumulative effects, have been assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047]. The results of this assessment conclude that, with the proposed management and mitigation in place, effects on the highway network for construction traffic, and including cumulative development traffic, would not be significant. Construction traffic routeing, AIL movements, associated mitigation and traffic management measures are set out alongside an indicative construction programme within the Outline CTMP [APP-201]. A detailed CTMP, substantially in accordance with the

ID	Theme	Representation	Applicant's Response
		- loss of privacy - prolonged disturbance The ES does not assess: - duration - phasing - cumulative construction impacts	Outline CTMP [APP-201], will be secured through the Requirements of the Draft DCO [AS-032] and approved in consultation with the relevant authorities prior to construction. Air quality effects resulting from road traffic emissions during the construction phase have been assessed within ES Volume 1, Chapter 13 – Air Quality [APP-049] in accordance with EPUK & IAQM guidance. An assessment of the risk of construction dust impacts to determine appropriate mitigation for inclusion in the Outline CEMP [APP-196] is provided in ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment. Mitigation to control dust emissions during construction are provided in the Outline CEMP [APP-196]. Noise and vibration effects from construction are assessed within ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Mitigation to control noise and vibration during construction are provided in the Outline CEMP [APP-196] A detailed CEMP, to be substantially in accordance with the Outline CEMP, is secured by Requirement 13 of the Draft DCO [AS-032].
GMAG-229	Policy compliance	13.8. Policy Non-Compliance The scheme does not comply with	The Planning Statement [APP 209] and Policy Compliance Document [APP-210] sets out how the

ID	Theme	Representation	Applicant's Response
	Landscape and Visual Noise and Vibration	• NPS EN-1 (residential amenity, noise, lighting, human health) • NPS EN-3 (BESS noise and amenity) • NPS EN-5 (substation noise and visual impacts) • EIA Regulations (baseline, cumulative effects) • BS 4142 (tonal penalties) • BS 8233 (internal noise levels) • NPPF (protection of residential amenity) The applicant has not demonstrated that impacts have been minimised or mitigated.	Scheme complies with relevant national and local planning policies. The ES [APP-036 to APP-195] and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes. The assessment has demonstrated the impact of mitigation the identified likely significant effects.
GMAG-230	Scheme Description	13.6. Misleading Use of the Term "Southern Cluster" and Failure to Identify Affected Village GMAG notes that the applicant repeatedly uses the undefined term "Southern Cluster" to describe the area containing the villages of Great Moulton, Tivetshall and Wacton. This terminology is imprecise, obscures the identity of the affected settlements, and does not meet	The Applicant draws attention to the fact that receptors have been specifically identified within each technical chapter of the ES [APP-036] to [APP-195], with named settlements and individual visual receptors considered where relevant. For example, ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] identifies visual receptors within Great Moulton, Tivetshall and Wacton by name, supported by the Residential Visual Amenity Assessment [APP-148] and Public Rights of Way Visual Amenity Assessment [APP-149]. ES

ID	Theme	Representation	Applicant's Response
		the requirements of a lawful Environmental Statement Under Regulation 14 of the EIA Regulations, an ES must clearly identify receptors, describe the environment likely to be affected, and present information in a manner that is intelligible and not misleading. The use of a generic cluster label in place of the names of established villages fails this test. NPS EN1 requires applicants to provide a robust, transparent and accurate evidence base, including clear identification of communities affected by noise, lighting, landscape change, construction impacts and operational risk. NPS EN5 requires proper assessment of settlement context, amenity effects and the relationship between substations, overhead lines and nearby residential receptors By referring to this area only as the "Southern Cluster", the applicant downplays the presence of long-established rural communities and presents a settled landscape as if it were an undifferentiated land parcel.	Volume 1, Chapter 12 – Noise and Vibration [APP-048], supported by ES Volume 2, Figure 12.2 – Noise and Vibration Sensitive Receptors [APP-099], identifies named noise-sensitive receptors within the vicinity of the Scheme. The Applicant further draws attention to ES Volume 1, Chapter 14 – Socio-Economics [APP-050], which considers effects on the local area and communities, informed by responses to consultation from parish councils including Great Moulton Parish Council. The Equality Impact Assessment [APP-214] additionally identifies the named villages within the Study Area that will be impacted by the Scheme, including Great Moulton. The Applicant considers that the ES has clearly identified the receptors and settlements affected by the Scheme in accordance with the requirements of the EIA Regulations, NPS EN-1 and NPS EN-5.

ID	Theme	Representation	Applicant's Response
		This undermines the clarity of the assessment and risks misinforming the Examining Authority about the true human and community context of the proposed development GMAG therefore submits that the ES does not comply with Regulation 14, EN1 or EN5 in its identification of affected communities, and that this deficiency reduces the reliability of the applicant's assessment of amenity, landscape, noise, lighting and cumulative effects.	
GMAG-231	Noise and Vibration Landscape and Visual Lighting Construction	13.10 Conclusions and Planning Weigh GMAG submits that the proposed development would give rise to significant, adverse and long-lasting impacts on the residential amenity of homes on the southern edge of Great Moulton. These impacts arise from the development itself — including the 400kV National Grid substation, the project substation, the BESS compound, overhead lines, gantries, fencing, lighting and access roads — and not merely from deficiencies in the Environmental Statement. The ES fails to assess these impacts lawfully or	The Applicant addresses this comment with regards to residential visual amenity in GMAG-122 above. The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and related appendices has been undertaken in accordance with the appropriate guidelines and policy, and that it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The Applicant addressed this comment with regards to noise and vibration in GMAC-149-159. The Applicant addressed this comment with regards to lighting in GMAC-165.

ID	Theme	Representation	Applicant's Response
		comprehensively, but the underlying issue is that the scale, proximity and industrial character of the infrastructure proposed would fundamentally alter the living conditions of nearby residents. The development would result in - the loss of open rural outlook and replacement with a dominant industrial complex - continuous operational noise, including low-frequency transformer hum and BESS cooling noise - night-time lighting impacts in an area currently characterised by dark skies - visual dominance from tall structures, gantries and lighting columns - construction noise, vibration, dust, traffic and prolonged disturbance - loss of tranquillity and degradation of the rural residential environment - cumulative amenity harm from the colocation of multiple high-impact infrastructure elements	The Applicant's position on the Scheme's compliance with NPS EN-1, EN-3, and EN-5 is set out within the Policy Compliance Document [APP-210]. NPS EN-1 states at para 5.10.5 that '<i>Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>', and at para 5.10.13 that '<i>All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites</i>'. The Applicant acknowledges that the Scheme would introduce changes to the landscape including to the PRoW network. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse effects are demonstrably outweighed by the Scheme's benefits and needs case.

ID	Theme	Representation	Applicant's Response
		These impacts are substantial, adverse and unavoidable due to the location of the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster immediately adjacent to residential properties. The applicant has not demonstrated that these impacts can be mitigated to an acceptable level, nor that alternative locations or configurations were properly assessed. The ES does not assess • key residential receptors • loss of outlook • night-time lighting • low-frequency and tonal noise • sleep disturbance • cumulative amenity effects • construction phasing and duration As a result, the ES does not provide the Examining Authority with the information required to understand the full extent of residential amenity harm arising from the development. Planning Weight:	

ID	Theme	Representation	Applicant's Response
		Given the proximity of the infrastructure to homes, the sensitivity of the residential environment, the scale of the operational and construction impacts, and the complete absence of a lawful assessment of cumulative amenity effects, GMAG submits that substantial negative weight must be attached to the residential amenity impacts of the scheme. The ES, as submitted, does not meet the requirements of Regulation 14 and cannot lawfully support a grant of development consent. Until a complete, accurate and regulation-compliant residential amenity assessment is provided — and unless the applicant can demonstrate that the development would not cause unacceptable harm to the living conditions of nearby residents — the applicant's case carries very limited weight in the planning balance.	
GMAG-232	Cumulative impact	Cumulative Effects 14.1. Introduction and Summary of Concerns GMAG has fundamental concerns regarding the cumulative effects of the proposed development. The	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the

ID	Theme	Representation	Applicant's Response
		Environmental Statement (ES) assesses each topic in isolation and fails to consider the combined, overlapping and interacting impacts of the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster, which includes • the 400kV National Grid substation • the project substation • the Battery Energy Storage System (BESS) • overhead lines and gantries • access roads • fencing and lighting • construction compounds • cable routes • Solar Panels The applicant has not provided a lawful cumulative effects assessment (CEA). The ES does not comply with: • NPS EN-1 (cumulative impacts) • NPS EN-3 (solar and BESS cumulative effects)	effects of the Scheme as a whole rather than individual elements in isolation. Cumulative effects with other schemes are identified in each of the technical chapters and in—combination effects are considered in ES Volume 1, Chapter 19 – In-Combination Effects Summary [APP-055].

ID	Theme	Representation	Applicant's Response
		- NPS EN-5 (overhead line cumulative effects) - EIA Regulations (Regulation 14: cumulative effects) The combined effects of these elements are far greater than the sum of their parts. GMAG submits that the cumulative effects assessment is incomplete, inconsistent and insufficient to support a lawful decision.	
GMAG-233	Cumulative impact Landscape and Visual Scheme Description	14.2. The Great Moulton and Tivetshall St Margaret Infrastructure Cluste The Great Moulton and Tivetshall St Margaret infrastructure cluster is the single most significant cumulative impact of the entire scheme. It comprises - a major 400kV National Grid substation - a second substation immediately adjacent - a large BESS compound - overhead lines and gantries	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation Regarding the interrelationships between environmental effects, ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects from other environmental topics. Section 19.2 details

ID	Theme	Representation	Applicant's Response
		• access roads • security fencing • lighting columns • construction compounds • Solar Panel Together, these form a large industrial complex in a rural landscape. The ES does not assess the combined footprint, massing, noise, lighting, safety or landscape impacts of this cluster.	the methodology utilised for the in-combination effects assessment.
GMAG-234		14.3. Cumulative Landscape and Visual Effects The combined landscape and visual effects include: • industrialisation of a rural landscape • dominance of the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster • loss of rural outlook for residents • cumulative lighting impacts	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation.

ID	Theme	Representation	Applicant's Response
		- cumulative massing of two substations plus BESS and Solar Panels - cumulative overhead line and gantry impact The ES assesses each element separately, but not the combined effect of all elements together. The result is a significant underestimation of visual harm.	
GMAG-235	Cumulative impact Noise and Vibration	14.4. Cumulative Noise Effects The combined noise sources include - transformer hum (multiple units) - BESS cooling systems - switchgear - auxiliary equipment - overhead line corona noise - construction traffic - construction plant The ES does not assess - cumulative operational noise - cumulative low-frequency noise	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. The Applicant addressed this comment with regards to noise and vibration in GMAC-149-159.

ID	Theme	Representation	Applicant's Response
		• cumulative tonal noise • cumulative night-time noise • cumulative construction noise This is contrary to BS 4142 and BS 8233.	
GMAG-236	Cumulative impact Lighting	14.5. Cumulative Lighting Effect The combined lighting sources include • substation operational lighting • BESS lighting • security lighting • access road lighting • construction lighting The ES does not assess • cumulative skyglow • cumulative light spill • cumulative night-time visual impacts • cumulative ecological impacts This is a major omission.	The Applicant addressed this comment with regards to lighting in GMAC-165.
GMAG-236	Cumulative impact	14.6. Cumulative Hydrological and Groundwater Effects	Water receptors have been identified and assessment of effects provided within ES Volume 1, Chapter 9 – Water Environment . Baseline flood risk is provided in

ID	Theme	Representation	Applicant's Response
	Water Environment	The combined hydrological impacts include: • increased hardstanding • increased runoff • increased contamination risk • combined firewater risk from BESS and substations • cumulative drainage impacts • cumulative groundwater vulnerability The ES does not assess • dual-catchment cumulative effects • winterbourne mobilisation • combined pollution pathways • cumulative PFAS contamination risk This is contrary to EN-1 and the Water Framework Directive.	ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]. Geological and groundwater level information has been provided through historical boreholes in the vicinity of the Order Limits within ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184-186] which shows that the majority of the Order Limits is underlain by significant thickness of Diamicton (also known as 'Boulder Clay') of the Lowestoft Formation. The Diamicton typically comprises clay which is variably sandy and gravelly – i.e., the Diamicton is predominantly cohesive. It is recognised that the Diamicton may contain more granular lenses or layers, however these are not anticipated to be laterally or vertically extensive. On this basis, a shallow groundwater table within the Diamicton is not anticipated 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 results of the ground investigation will be presented in an interpretative Tier 2 Generic Quantitative Risk Assessment (GQRA). If / where the GQRA identifies potential hazards within this area, then further work (including the use of fate and transport models) may be undertaken as part of a Detailed Quantitative Risk Assessment

ID	Theme	Representation	Applicant's Response
			The Outline CEMP [APP-196] requires the Applicant to undertake Foundation Works Risk Assessment to assess the risks to the Principal Aquifer associated with the construction of 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 ground investigation. Where trenchless cable crossings interact with Principal or Secondary A Aquifers or pass beneath surface watercourses or sensitive ecological receptors, a Hydrogeological Risk Assessment will be undertaken, if required as secured within the Outline CEMP [APP-196] The design of the Scheme has not yet been finalised and therefore the surface water drainage strategy is outline in its form but confirms the likely attenuation form and volume requirements. There is commitment for a drainage design to accommodate the 1 in 100 annual probability +45% allowance for climate change rainfall event as secured within the Design Principles, Parameters and Commitments [APP-213] The surface water drainage design has been prepared in mind of pollution risk to aquifers and as such the surface water drainage systems for the BESS, National Grid and Project Substations will be lined with an impermeable membrane to prevent runoff from infiltrating to the strata beneath as secured within the Design Principles, Parameters and Commitments

ID	Theme	Representation	Applicant's Response
			[APP-213]. Commitment has also been made in this document to the provision of swales and filter drains for access track drainage Cumulative schemes within proximity to the Scheme will be required to provide embedded mitigation identical or similar to that proposed and secured for the Scheme, including surface water runoff and pollution management. As such the residual risk of cumulative pollutant mobilisation and PFAS contamination is assessed as 'Not Significant'.
GMAG-237	Cumulative impact Major Accidents and Disasters Battery Safety	14.7. Cumulative Safety Risk The combined safety risks include: • BESS thermal runaway • transformer fires • firewater contamination • explosion risk • cascading failure between co-located infrastructure • emergency access constraints • aviation safeguarding issues The ES does not assess: • combined fire scenarios	It was agreed with the ExA through the EIA Scoping Process (see ES Volume 3, Appendix 2.2 EIA Scoping Opinion [APP-114]) that Major Accidents and Disasters would be scoped out of the ES. Section 18.2 of ES Volume 1, Chapter 18 Other Environmental Matters [APP-054] has been produced to further demonstrate that Major Accidents and Disasters have been sufficiently addressed, with mitigation measures secured and pose no likely significant effects. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205] and the Design Principles, Parameters and Commitments [APP-213] The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations and fully complying

ID	Theme	Representation	Applicant's Response
		- combined emergency response requirements - combined hazardous materials risk - combined plume modelling This is contrary to EN-1, EN-3 and EN-5.	with the National Fire Chiefs Council (NFCC) Grid scale energy storage system planning guidance (2026). The Applicant's Outline BSMP [APP-200] provides comprehensive information on preventing and mitigating BESS failure and thermal runaway scenarios, fire water contamination, explosion risk, fire propagation risks, emergency access requirements, emergency response planning requirements, and credible BESS failure scenario hazard mitigation. A BESS Fire Emissions to Air Risk Assessment (Plume Study) has been undertaken to understand the potential air quality impacts of emissions released during a BESS fire on human receptors. This assessment is presented in Appendix B of the Outline BSMP [APP-200] and has been used to inform emergency response mitigation measures presented in the Outline BSMP. This assessment aligns with paragraph 4.12.14 and section 5.2 of EN-1. The Plume Study demonstrated that there were no significant impacts on any sensitive residential receptor location with 1km of the BESS compound in the event of a BESS fire. A risk assessment of the potential impact on visibility has also been undertaken for nearby road and rail receptors. The predicted visibility distances in the event of a BESS fire are greater than the safe stopping distances for roads and rail.

ID	Theme	Representation	Applicant's Response
			Compliance with the National Policy Statements is set out in the Policy Compliance Document [APP-210]
GMAG-238	Cumulative impact Transport and Access	14.8 Cumulative Transport and Access Effect The combined transport impacts include • simultaneous construction of multiple infrastructure elements • overlapping HGV movements • overlapping abnormal loads • cumulative road closures • cumulative traffic congestion • cumulative safety risks for vulnerable road users The ES does not assess: • cumulative construction traffic • cumulative abnormal load routing • cumulative severance impacts This is contrary to EN-1 and DfT guidance.	The Applicant does not agree that cumulative construction traffic, AIL routing or severance impacts have not been assessed. ES Volume 1, Chapter 11 - Transport and Access [APP-047] includes an assessment of cumulative development assessment which considers cumulative traffic flows and effects on the transport network in alignment with IEMA Guidelines. Where relevant initial thresholds were exceeded, further detailed assessment is provided which concluded that no significant adverse effects would arise. The Applicant also notes that the assessment represents a reasonable worst-case scenario, as construction activities would in reality be staggered across the programme and not occur simultaneously. The assessment was informed by the proposed access strategy, construction vehicle trip generation, and engagement with NCC as the Local Highway Authority. This is detailed within the Transport Assessment [APP-174 to 177] alongside proposed management and mitigation measures within the Outline CTMP [APP-201]. The Applicant therefore considers that cumulative movements, AILs and severance impacts have been

ID	Theme	Representation	Applicant's Response
			robustly assessed in alignment with IEMA Guidelines, EN-1 and DfT guidance
GMAG-239	Cumulative impact Ecology and Biodiversity	14.9. Cumulative Ecological Effects The combined ecological impacts include: • habitat loss • corridor severance • lighting impacts • noise disturbance • fragmentation of hedgerows • loss of foraging and commuting routes • cumulative impacts on bats, birds, GCN and badger The ES does not assess: • cumulative habitat fragmentation • cumulative lighting impacts on bats • cumulative disturbance to farmland birds • cumulative loss of ecological connectivity	The technical assessments within the ES [APP-042 to APP-056] are informed by the description of the Scheme provided within ES Volume 1, Chapter 4 – The Scheme [APP-040], which includes all components of the Scheme, including operational phase maintenance and replacement activities. The assessments within the ES therefore consider the effects of the Scheme as a whole rather than individual elements in isolation. Notably, the ecological effects of the Scheme as a whole are considered within Sections 8.5 – 8.11 of the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Due consideration has been made to relevant legislation, policy and guidance in undertaking the ecological assessment. Further details are set out within Section 8.3 of the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] Please refer to the Applicant's Response as GMAG-110 with regard the Cumulative Effects Assessment for ecology.

ID	Theme	Representation	Applicant's Response
		This is contrary to EN-1 and the NPPF.	
GMAG-240	Cumulative impact Noise and Vibration Lighting Landscape and Visual Transport and Access Construction	14.10 Cumulative Residential Amenity Effects Residents will experience • cumulative noise • cumulative lighting • cumulative visual dominance • cumulative construction disturbance • cumulative traffic impacts • cumulative loss of tranquillity The ES does not assess: • combined amenity impacts • combined night-time impacts • combined construction and operational impacts This is contrary to EN-1 and the NPPF.	The interaction and combination of different residual environmental effects of the Proposed Scheme affecting the same receptor, which appears to be the suggestion of the representation, are in-combination effects rather than cumulative. Regarding the interrelationships between environmental effects, ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects from other environmental topics.
GMAG-241	Reasonable Alternatives and Design Evolution	14.11. Failure to Assess Alternatives The applicant has not: • assessed alternative sites • assessed alternative layouts	The Applicant considers that the assessment of alternatives has been undertaken in accordance with the requirements of NPS EN-1 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and that the reasonable alternatives studied by the Applicant are appropriately documented

ID	Theme	Representation	Applicant's Response
		- assessed alternative grid connection points - assessed alternative land parcels of lower agricultural grade This is contrary to: - NPS EN-1 (reasonable alternatives) - EIA Regulations (alternatives) The failure to assess alternatives is a fundamental flaw.	within ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215], in accordance with paragraph 4.2.27 of NPS EN-1 which recognises that alternative proposals which mean the necessary development could not proceed (for example because they are not commercially viable or physically suitable) can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.
GMAG-242	Policy compliance Cumulative impact	14.12. Policy Non-Compliance The scheme does not comply with - NPS EN-1 (cumulative effects, alternatives, amenity, safety) - NPS EN-3 (cumulative effects of solar and BESS) - NPS EN-5 (cumulative effects of substations and overhead lines) - EIA Regulations (Regulation 14: cumulative effects) - NPPF (cumulative impacts on communities and landscape)	Compliance with NPS EN-1, EN-3 and EN-5 is set out within the Policy Compliance Document [APP-210] Paragraph 4.3.9 of NPS EN-1 confirms that, from a policy perspective, there is no general requirement to consider alternatives or to establish whether a development represents the best option. Paragraphs 4.3.15 to 4.3.17 of NPS EN-1 nevertheless require Applicants to include in the Environmental Statement information about the reasonable alternatives studied, and paragraph 4.3.22 of NPS EN-1 provides that the consideration of alternatives should be carried out in a proportionate manner, with only alternatives that meet the objectives of the proposed development being considered. This has been met as documented in ES Volume 1, Chapter 5 – Reasonable Alternatives and

ID	Theme	Representation	Applicant's Response
		The applicant has not demonstrated that cumulative impacts have been assessed, avoided or mitigated.	Design Evolution [APP-041] and the Site Selection Assessment [APP-215]. The ES [APP-042 to 054] also presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The ES is considered to meet the requirements of Regulation 14.
GMAG-243	Cumulative impact	14.13. Conclusions and Planning Weight GMAG submits that the cumulative effects of the proposed development are substantial, adverse and fundamentally underestimated. The Environmental Statement does not provide a lawful or reliable cumulative effects assessment, but the underlying issue is that the development itself — through the concentration of multiple high-impact infrastructure elements within the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster — would generate a level of combined harm far greater than the sum of its individual components. The cumulative impacts of the scheme include:	The ES [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The ES is considered to meet the requirements of Regulation 14. Regarding the interrelationships between environmental effects, ES Volume 1, Chapter 19 – In-Combination Effects Assessment [APP-055] presents the potential likely in-combination effects between topics, setting out the interrelationship arising as a result of direct effects from other environmental topics. The ES is considered to meet the requirements of Regulation 14.

ID	Theme	Representation	Applicant's Response
		• cumulative landscape and visual harm, arising from the combined massing of two substations, a large BESS compound, overhead lines, gantries, fencing and lighting • cumulative noise impacts, including transformer hum, BESS cooling noise, tonal and low-frequency noise, and construction noise • cumulative lighting impacts, including operational lighting, security lighting, skyglow and night-time visual intrusion • cumulative hydrological and contamination risks, including increased runoff, altered drainage, groundwater vulnerability, and combined firewater/PFAS contamination pathways • cumulative safety risks, including cascading failure between colocated substations and BESS, transformer fire risk, thermal runaway, explosion risk and emergency access constraints • cumulative transport disruption, including overlapping HGV	

ID	Theme	Representation	Applicant's Response
		movements, abnormal loads, construction compounds, road closures and severance of rural communities • cumulative ecological harm, including habitat loss, corridor severance, lighting disturbance, noise disturbance and fragmentation of ecological networks • cumulative residential amenity impacts, including combined noise, lighting, visual dominance, construction disturbance and loss of tranquillity • cumulative agricultural land loss, including permanent loss of BMV land and regional-scale pressures on Norfolk's agricultural productivity These impacts interact, overlap and reinforce one another. The Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster functions as a single industrial complex, and its combined effects cannot be understood by assessing each component in isolation. The applicant has not demonstrated that these cumulative	

ID	Theme	Representation	Applicant's Response
		impacts have been avoided, minimised or mitigated, nor have they provided a lawful cumulative effects assessment as required by Regulation 14 of the EIA Regulations.	
GMAG-244	Cumulative impact	Planning Weight Given the scale, intensity and permanence of the cumulative impacts; the failure to assess combined effects across all environmental topics; the concentration of multiple high-risk and high-impact infrastructure elements within a single location; and the absence of a lawful cumulative effects assessment, GMAG submits that substantial negative weight must be attached to the cumulative impacts of the scheme. The ES, as submitted, does not meet the requirements of Regulation 14 and cannot lawfully support a grant of development consent. Until a complete, accurate and regulation-compliant cumulative effects assessment is provided — and unless the applicant can demonstrate that the combined impacts of the development are acceptable — the applicant's case	The Applicant refers to its response to GMAG-243.

ID	Theme	Representation	Applicant's Response
		carries very limited weight in the planning balance.	
GMAG-245	Human Health	Wellbeing and Mental Health 15.1 Introduction and Summary of Concerns GMAG has significant concerns regarding the impacts of the proposed development on the wellbeing and mental health of residents in Great Moulton. The Environmental Statement (ES) does not assess these impacts, despite clear requirements under NPS EN-1, the EIA Regulations, and the NPPF to consider human health, quality of life and community wellbeing. The Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster — comprising the 400kV National Grid substation, the project substation, the BESS compound, overhead lines, access roads, construction compounds and security lighting — would introduce a permanent industrial complex into a previously tranquil rural environment. The combined effects of noise, lighting, visual dominance, construction	The Applicant does not agree that human health, wellbeing, mental health or quality of life impacts have not been assessed. These matters have been considered through the Environmental Statement technical assessments, the Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054], and the Equality Impact Assessment [APP-214]. The assessments consider potential effects associated with noise, traffic, air quality, access, landscape and visual change, lighting, Public Rights of Way and changes to rural character, including potential effects on mental wellbeing. While temporary adverse effects may occur during construction, these would be managed through mitigation measures including traffic and PRow management, environmental controls, landscape mitigation and ongoing community engagement. Taking account of the proposed mitigation, the assessments conclude that no likely significant adverse residual effects on human health, wellbeing or mental health are anticipated.

ID	Theme	Representation	Applicant's Response
		disturbance, traffic and loss of rural character would create a sustained and unavoidable burden on residents' mental wellbeing The ES does not provide a lawful or meaningful assessment of these impacts.	
GMAG-246	Landscape and Visual Lighting Noise and Vibration Human Health	15.2. Loss of Tranquillity and Rural Character Tranquillity is a key contributor to rural wellbeing. Residents currently experience: • low background noise • dark skies • open rural views • absence of industrial activity • a strong sense of place and community identity The introduction of a large industrial cluster would fundamentally alter this environment, resulting in: • loss of peace and quiet	The Applicant considers that the Landscape and Visual Assessment presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and related appendices has been undertaken in accordance with the appropriate guidelines and policy, and that it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The Applicant does not agree that the assessment has failed to properly consider dark skies or tranquillity. The baseline assessment recognises the presence of dark skies and tranquil rural landscapes within the Scheme area and these characteristics have informed both the Scheme design and the assessment process. These findings are presented in ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119]. Effect on tranquillity has been assessed as part of the Landscape Assessment and is presented in ES Volume 3, Appendix 7.3 - Landscape Assessment Tables [APP-120].

ID	Theme	Representation	Applicant's Response
		- loss of restorative landscape qualities - increased stress and anxiety reduced psychological wellbeing The ES does not assess these impacts.	Comment on industrialisation of landscape previously addressed in GMAG-124. The Applicant addressed this comment with regards to lighting in GMAC-165. The Applicant recognises that tranquillity, sense of place, stress, anxiety and other wellbeing considerations can influence health outcomes. These matters are considered within the Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054], which assesses potential health and wellbeing effects arising from environmental change and identifies groups who may be more vulnerable to such effects. The Applicant therefore does not agree that the ES fails to assess these issues. The Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] concludes that, taking account of mitigation and the findings of the relevant ES assessments, the Scheme is not expected to result in significant adverse long-term effects on human health and wellbeing.

ID	Theme	Representation	Applicant's Response
GMAG-247	Noise and Vibration	15.3. Noise-Related Stress and Sleep Disturbance Continuous operational noise from: - transformers - BESS cooling systems - auxiliary equipment - overhead line corona noise combined with construction noise, would create: - chronic noise exposure - sleep disturbance - increased stress levels - reduced cognitive function - long-term health impacts Night-time noise is particularly harmful to mental health. The ES does not assess night-time noise or sleep disturbance.	The Applicant addressed this comment with regards to noise and vibration in GMAC-149-159.
GMAG-248	Lighting Human Health	15.4. Lighting Impacts on Wellbeing The scheme would introduce: permanent night-time lighting	The Applicant does not agree that lighting-related health effects have not been considered. The Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] considers

ID	Theme	Representation	Applicant's Response
		• skyglow • glare • light spill into homes and gardens Artificial light at night is associated with: • disrupted circadian rhythms • reduced sleep quality • increased anxiety • impaired mental wellbeing Great Moulton currently enjoys dark-sky conditions The ES does not assess lighting impacts on human health.	lighting where it is relevant to health pathways, including landscape and visual amenity, residential amenity, access to nature, and mental wellbeing. Mitigation measures include controls on construction lighting secured through the ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151] and design principles set out in the Design Approach Document [APP-212], which seek to minimise light spill and reduce effects on residential amenity, Public Rights of Way, and the rural setting. The Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] does not identify any significant adverse health effects arising from lighting.
GMAG-249	Landscape and Visual Human Health	15.5. Visual Intrusion and Loss of Outlook The Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster would be visible from numerous homes, replacing rural views with • steel gantries • transformers • fencing	A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Further, a visual amenity assessment of Public Rights of Way is present in ES Volume 3, Appendix 7.9 [APP-149] and on residential properties in ES Volume 3, Appendix 7.8 [APP-148]. The Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] identifies landscape character and visual amenity as determinants of health and wellbeing, recognising

ID	Theme	Representation	Applicant's Response
		- lighting columns - industrial buildings Visual intrusion is linked to: - increased stress - reduced quality of life - loss of place attachment - reduced sense of safety The ES does not assess loss of outlook or visual dominance.	their influence on mental wellbeing, sense of place, recreation and connection to nature. Visual change has therefore been considered as a relevant health pathway. The assessment acknowledges that nearby residents and PRoW users may experience adverse visual effects during construction and early operation. However, these effects are expected to reduce over time as landscape mitigation establishes. By Year 15, most landscape and visual effects are predicted to be slight or negligible, with significant residual effects limited to a small number of locations. Accordingly, the Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] does not identify significant adverse long-term effects on human health and wellbeing arising from visual change or loss of outlook
GMAG-250	Major Accidents and Disasters Battery safety Human Health	15.6. Anxiety Associated with BESS and Substation Safety Residents have expressed significant concern regarding: - BESS thermal runaway - fire and explosion risk - toxic smoke plumes	The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations and fully complying with the National Fire Chiefs Council (NFCC) Grid scale energy storage system planning guidance (2026). The Outline BSMP [APP-200] provides comprehensive information on preventing and mitigating BESS failure and thermal runaway scenarios, fire water

ID	Theme	Representation	Applicant's Response
		- PFAS-contaminated firewater - emergency access limitations These concerns are reasonable and grounded in real-world incidents. Chronic anxiety about major accident hazards is a recognised wellbeing impact. The ES does not assess psychological stress associated with safety risks.	contamination, explosion risk, fire propagation risks, emergency access requirements, emergency response planning requirements, and credible BESS failure scenario hazard mitigation. The safety objectives for the design of the Applicant's BESS site are listed in Section 1.4 of the Outline BSMP [APP-200]. Section 1.4.2 of the Outline BSMP [APP-200] stipulates: "<i>Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> <i>To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i>

ID	Theme	Representation	Applicant's Response
			<i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."</i> Section 2 of the Outline BSMP [APP-200] documents the Applicant's consultation with NFRS. Section 4 of the Outline BSMP [APP-200] covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Applicant will provide any specialist firefighting equipment required by NFRS, this would be stored within the BESS site. The requirement for specialist equipment will be ascertained at the detailed design stage in consultation between the Applicant and NFRS. The Applicant confirms that firefighting water supply and pollution containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple BESS enclosures to be involved, and is not limited to routine or minor events. The illustrative design includes two water tanks, each with approximately 228,000 litres of water. This would provide 1,900 litres per minute for approximately 4 hours of water which is more than double the 2-hour minimum duration at 1500 LPM (180,000 litres) stated in 2026 NFCC guidance.

ID	Theme	Representation	Applicant's Response
			The firefighting water requirement will be fully assessed at the detailed design stage based upon a comprehensive review of BESS fire and explosion test data for the selected BESS system by an independent Fire Protection Engineer and water storage volumes will be fully agreed with NFRS. Section 4.5 of the Outline BSMP [APP-200] documents the drainage strategy for the BESS area. The Applicant confirms that firefighting water containment for the BESS has been designed on the basis of credible incident scenarios, including the potential for multiple units to be involved, and is not limited to routine or minor events. The approach set out in the Outline BSMP [APP-200] oBSMP is to contain and isolate firefighting water within the BESS Area, rather than allow discharge to the environment. This is achieved through a sealed and isolatable drainage system, capable of retaining firefighting water and rainfall during an incident. The Environment Agency (EA) is a statutory consultee for the Scheme, and the Applicant is working closely with the EA to ensure all pollution risks are mitigated and fully agreed. A Statement of Common Ground between the Applicant and the EA will be submitted as part of the DCO process. NFPA 855 (2026) defines a safe BESS exclusion zone as follows: "Potential debris impact radius is defined as 100 feet (ft) or 30.5 metres (m) i.e. this is a typical explosion risk safe exclusion zone radius as modelling

ID	Theme	Representation	Applicant's Response
			and previous BESS incidents typically show 25 m to be maximum radius.” Further explosion prevention, mitigation, and safety requirements for the Scheme are stipulated in the Outline BSMP [APP-200] Sections: 3.1.4 – 3.1.5, 3.1.10, 3.1.18, 3.1.27, 3.1.30 – 3.1.31, 4.1.6, 5.1.3 - 5.1.6. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in the Outline BSMP [APP-200] Appendix B: Battery Energy Storage System (BESS) Fire – Emissions to Air Risk Assessment) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area, this includes public rights of way (PROW). The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude that the <i>“proposed development should not result in any significant adverse impact on public health.”</i> The

ID	Theme	Representation	Applicant's Response
			spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred; therefore, this is a credible worst-case scenario. To validate the final BESS site design, the Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 4.5.13 of the Outline BSMP [APP-200] and secured through the DCO: "at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data

ID	Theme	Representation	Applicant's Response
			will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [APP-200] pre-construction requirements (Section 5). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure fire, to determine propagation risk to adjacent BESS or equipment, and establish minimum equipment spacing distances. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. The purpose of this testing is expressly to validate minimum equipment spacing and to demonstrate that cascading or multi-BESS enclosure ignition does not occur where tested layouts and mitigation measures are implemented. These tests therefore explicitly address the type of multi-BESS fire propagation risks, including scenarios observed in real world incidents, by requiring evidence that propagation risk is controlled through design rather than reliance on emergency intervention. The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032]. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency, prior

ID	Theme	Representation	Applicant's Response
			to the commencement of the works for the BESS. The BSMP will be substantially in accordance with the Outline BSMP [APP-200]. The Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] identifies concern about potential risks as a potential influence on mental wellbeing, with mental wellbeing and equality-related effects also considered within the Equality Impact Assessment[APP-214]. The assessment concludes that BESS fire scenarios present a very low likelihood of exposure, with mitigation and emergency measures secured through the Outline Battery Safety Management Plan (oBSMP) [APP-200]. While residents' concerns are acknowledged, the assessment does not identify significant adverse effects on human health, including for vulnerable groups.
GMAG-251	Construction Human Health	15.7. Construction-Related Stress and Disruption Construction will involve: • heavy plant • HGVs • road closures • dust	The construction duration will be 18-24 months. The Applicant does not agree that construction-related mental health effects have been omitted from the ES. The Human Health Summary Statement in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] recognises that construction activity can affect mental wellbeing. The Equality Impact Assessment [APP-214] considers potential effects on mental health and wellbeing arising from factors such as noise, air quality,

ID	Theme	Representation	Applicant's Response
		- vibration - prolonged disturbance Long-term construction activity is associated with: - increased stress - reduced wellbeing - social disruption - loss of privacy - cumulative fatigue The ES does not assess construction impacts on mental health.	lighting, visual amenity, access changes, community severance and safety. Using the Mental Health and Wellbeing Impact Assessment (MWHIA) four-factor framework, it recognises that some groups, including older people, disabled people, neurodivergent people, children, carers and people with pre-existing health conditions, may be more sensitive to these effects. The assessment acknowledges that a scheme of this scale may give rise to temporary concerns relating to uncertainty, environmental change and construction activities. However, these effects would be managed through embedded mitigation, including the Outline Construction Environmental Management Plan [APP-196], Outline Construction Traffic Management Plan [APP-201] and Outline Public Rights of Way and Permissive Paths Management Plan [APP-203]. While temporary negative effects on mental wellbeing during construction are recognised, the assessment concludes that significant adverse effects on human health and wellbeing are not likely to be substantial.
GMAG-252	Construction	15.7.1. Misclassification of Construction Duration The ES classifies all construction-phase effects as “short-term”, despite a confirmed two-year construction period. WHO guidance recognises that prolonged exposure to noise, lighting,	The Applicant acknowledge that construction duration will be 18-24 months. As detailed within Chapter 2, for purposes of the assessment, the construction phase effects may result from activities during site preparation, enabling works and also construction and commissioning activities. This covers sources of effects such as construction traffic, construction activity noise

ID	Theme	Representation	Applicant's Response
		traffic disturbance and visual intrusion constitutes medium-term chronic stress, not short-term disturbance. The ES therefore underestimates the wellbeing and mental health impacts on residents living adjacent to the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster.	and vibration, dust generation, site runoff, mud on roads, risk of fuel and oil spillage and the visual intrusion of plant and machinery on Site. The duration of construction-related effects will be different for different activities. For example, impacts related to earth moving are likely to be short in duration compared with the construction of energy infrastructure or landscaping activities
GMAG-253	Human Health Equality Impact Assessment	15.8. Impacts on Vulnerable Groups The scheme would disproportionately affect: • children • elderly residents • those with pre-existing health conditions • those with sensory sensitivities • those working from home The ES does not assess differential impacts on vulnerable groups.	The potential impacts on vulnerable groups, including older people, children and young people, disabled people, and those with existing health conditions, have been assessed in the Equality Impact Assessment [APP-214] and the Human Health Summary Statement contained within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. These assessments identify that vulnerable groups may be disproportionately affected during construction due to noise, dust, traffic disruption, severance, changes in access, and changes to views and landscape. Any adverse effects are expected to be temporary and would be managed through mitigation secured within the Outline CEMP [APP-196], Outline OEMP [APP-197], Outline LEMP [APP-199], Outline CTMP [APP-201], Outline OTMP [APP-202], and Outline Public Rights of Way and Permissive Paths Management Plan [APP-203]. Measures include traffic and PRoW

ID	Theme	Representation	Applicant's Response
			management, accessible stakeholder engagement, and route and signage improvements. During operation, vulnerable groups may benefit from enhanced access to PRoWs, permissive paths, and green space. Overall, the assessments conclude that vulnerable groups have been appropriately considered and that suitable mitigation is in place to minimise adverse effects.
GMAG-254	Human Health	15.9. Policy Non-Compliance The ES fails to comply with: • NPS EN-1 (5.11.1–5.11.4) — requiring assessment of population and human health • EIA Regulations Schedule 4 — requiring assessment of human health • NPPF (para 130 s 185) — requiring protection of health, wellbeing and quality of life The applicant has not demonstrated that wellbeing and mental health impacts have been assessed, avoided or mitigated.	An assessment of Human Health has been undertaken within the Human Health Summary Statement contained in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]. The statement summarises the likely significant effects on human health identified through the technical assessments reported within the ES. The assessment was undertaken in accordance with ISEP guidance and concludes that the Scheme is compatible with the protection of human health and wellbeing, does not exacerbate health inequalities, and supports national policy objectives relating to sustainable development and clean energy infrastructure. The Applicant considers that this assessment meets the requirements for the assessment of human health set out in NPS EN-1 (Sections 5.11.1-5.11.4), Schedule 4 of the EIA Regulations, and the NPPF (paragraphs 130 and 185).

ID	Theme	Representation	Applicant's Response
GMAG-255	Human Health	15.10. Conclusions and Planning Weight GMAG submits that the proposed development would give rise to significant, adverse and long-term impacts on the wellbeing and mental health of residents in Great Moulton. These impacts arise from the development itself — including the 400kV National Grid substation, the project substation, the BESS compound, overhead lines, gantries, lighting, access roads and construction compounds — and not merely from deficiencies in the Environmental Statement. The ES fails to assess these impacts at all, despite clear requirements under NPS EN-1, the EIA Regulations and the NPPF to consider human health, quality of life and community wellbeing. The development would result in: loss of tranquillity, including the erosion of peace, quiet and restorative rural qualities	The Applicant does not agree that human health, wellbeing, mental health or quality of life impacts have not been assessed. These matters have been considered proportionately through the ES technical assessments, the Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054], and the Equality Impact Assessment [APP-214]. The Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054], brings together the health-related findings from the ES, including potential effects linked to noise, air quality, traffic, access, landscape and visual change, water, ground conditions, climate change and electromagnetic fields. It recognises that health includes physical, mental and social wellbeing, and that some groups, including children, older people, disabled people and those with existing health conditions, may be more sensitive to temporary disturbance during construction. The Equality Impact Assessment [APP-214] specifically considers potential wellbeing and mental health-related equality impacts, including concerns raised through consultation. It identifies relevant impact pathways such as changes to Public Rights of Way, access to green space, severance, construction traffic, noise, dust, lighting, landscape change, perceived safety and changes to neighbourhood character.

ID	Theme	Representation	Applicant's Response
		- chronic noise exposure, including continuous transformer hum, BESS cooling noise and construction noise - night-time lighting impacts, including skyglow, glare and loss of dark skies - visual intrusion and loss of outlook, replacing rural views with a dominant industrial complex, replacing rural views with a dominant industrial complex - construction disturbance, including prolonged noise, vibration, dust, traffic and loss of privacy - anxiety associated with major accident hazards, including BESS thermal runaway, transformer fires, toxic smoke plumes and PFAS contamination - cumulative stress, arising from the combined and interacting effects of noise, lighting, visual dominance, construction activity and safety concerns - disproportionate impacts on vulnerable groups, including children, elderly residents, those with	However, it also recognises that mental health outcomes are highly individual and influenced by a range of personal, social and environmental factors, many of which lie outside the control of the Applicant. Both the Equality Impact Assessment [APP-214] and the Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] identify that potential adverse effects would mainly arise during construction and would generally be temporary. These effects would be managed through embedded and additional mitigation, including traffic and PRow management, environmental controls, accessible engagement, signage, route improvements and landscape mitigation. During operation, the Scheme may also provide benefits through improved PRow connectivity, permissive paths and access to green space. Overall, the Applicant considers that human health, wellbeing, mental health and equality matters have been appropriately assessed. With the proposed mitigation in place, the assessments do not identify likely significant adverse residual effects on human health or disproportionate effects on vulnerable or protected characteristic groups including residents in Great Moulton.

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		sensory sensitivities and those working from home These impacts are substantial, adverse and unavoidable due to the scale, proximity and industrial character of the Great Moulton, Tivetshall St Margaret and Wacton infrastructure cluster. The applicant has not demonstrated that these impacts can be mitigated, nor have they provided any lawful assessment of human health or wellbeing effects as required by national policy. The ES does not assess: • psychological stress • sleep disturbance • chronic noise-related health impacts • anxiety associated with major accident hazards • loss of tranquillity • impacts on vulnerable groups • cumulative wellbeing effects As a result, the ES does not provide the Examining Authority with the information	

ID	Theme	Representation	Applicant's Response
		required to understand the full extent of harm to human health and wellbeing arising from the development.	
GMAG-256	Human Health	Planning Weight: Given the sensitivity of the residential environment, the scale and permanence of the wellbeing impacts, the complete absence of a lawful human health assessment, and the cumulative nature of the harm, GMAG submits that substantial negative weight must be attached to the wellbeing and mental health impacts of the scheme. The ES, as submitted, does not meet the requirements of Regulation 14 and cannot lawfully support a grant of development consent. Until a complete, evidence-based and regulation-compliant assessment of human health and wellbeing is provided — and unless the applicant can demonstrate that the development would not cause unacceptable harm to the mental health and quality of life of nearby residents — the applicant's case carries very limited weight in the planning balance.	The Applicant does not agree that substantial negative weight should be attached to wellbeing or mental health impacts. Human health, wellbeing and equality impacts have been assessed through the Human Health Summary Statement within ES Volume 1, Chapter 18 – Other Environmental Matter [APP-054] and the Equality Impact Assessment [APP-214]. The Planning Inspectorate's Scoping Opinion confirmed that a standalone Human Health ES chapter was not required, provided relevant human health effects were assessed within the ES technical chapters and cross-referenced where appropriate. Accordingly, the Human Health Summary Statement brings together findings from across the ES, including noise and vibration, air quality, transport and access, landscape and visual effects, climate change, water environment, socio-economics, ground conditions and electromagnetic fields. The Applicant considers that this approach meets the requirements of Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, which requires the likely significant effects on population and human health to be identified,

ID	Theme	Representation	Applicant's Response
			described and assessed. The Equality Impact Assessment further supports consideration of the Public Sector Equality Duty under Section 149 of the Equality Act 2010, including potential wellbeing and mental health impacts on protected characteristic groups. Both assessments conclude that any adverse effects would largely be temporary, can be mitigated through secured management measures, and would not result in likely significant adverse residual effects on human health or disproportionate effects on protected characteristic groups. The Equality Impact Assessment also identifies potential wellbeing benefits from improved PRow connectivity, permissive paths and landscape enhancements. Accordingly, the Applicant considers that the ES, Human Health Summary Statement and Equality Impact Assessment provide a proportionate and robust evidence base for assessing human health, wellbeing and equality impacts and do not support the application of substantial negative weight on wellbeing or mental health grounds
GMAG-257	Cultural Heritage	Archaeology and Cultural Heritage 16.1 Introduction This chapter considers the archaeological and cultural heritage implications of the proposed development in the Great Moulton area,	The Applicant notes that the fieldwork within Site 1, Site 2 and the BESS, as detailed in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172] has primarily targeted areas where the geophysical survey (ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022]) has

ID	Theme	Representation	Applicant's Response
		specifically Site 1 and Site 2, which contain the National Grid Substation, Battery Energy Storage System (BESS), Point of Connection (POC) and associated cable corridors. These locations will experience the deepest excavations, largest ground disturbance, and most intensive construction activity within the entire scheme. The applicant's archaeological baseline is presented in ES Chapter 10 and Appendix 10.3 (Archaeological Geophysical Survey Report). GMAG has reviewed these documents with a focus on the Great Moulton area and concludes that the archaeological baseline is incomplete, unreliable and non-compliant with the requirements of the EIA Regulations, NPS EN-1 and Historic England guidance. 16.2. Summary of Applicant's Archaeological Submissions The applicant relies primarily on: a desk-based heritage assessment (ES Chapter 10)	identified archaeological potential, in addition to anomalies identified through aerial photography (ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024]), as well as existing entries on the Historic Environment Record, as detailed within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021]. While it is acknowledged that non-invasive survey works (e.g. geophysical survey and aerial mapping) are not infallible, and will not identify all feature types, it is, however, very useful in identifying the principal concentrations of archaeology, and there is no reason to believe the interpretation and reporting provided within ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022] is limited or inaccurate. The draft results of [AS-022] were provided to NCCHES for comment prior to the finalisation of the report. The geophysics results were also utilised in the placement of the subsequent phase of trenching, as detailed within ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172], with the location of these trenches approved by NCCHES prior to the start of fieldwork. As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject

ID	Theme	Representation	Applicant's Response
		- a geophysical survey (Appendix 10.3) - HER data - historic mapping The geophysical survey covers a large area of the scheme, but the interpretation and reporting for Site 1 and Site 2 are extremely limited, despite these being the most sensitive and heavily developed parts of the project.	to previous trenching. It has been agreed with NCCHES that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. Within Site 1, Site 2, and the BESS, [APP-173] notes that areas of known extensive impacts (i.e. BESS, Substations, working compounds) will be subject to informative trenching at 3.5% by area, with the identified Roman activity within Sub-Site 2A also to be subject to further mitigation works, the extent of which will be balanced against the finalised detailed development plans.
GMAG-258	Cultural Heritage	16.3. Deficiencies in the Archaeological Geophysical Survey (Sites 1 s 2 – Great Moulton Area) GMAG has reviewed the Archaeological Geophysical Survey Report (ES Appendix 10.3) with specific reference to Site 1 and Site 2, which cover the land immediately south of Great Moulton. These areas contain the National Grid Substation, BESS, POC, construction compounds, haul roads and major cable corridors. Despite this, the geophysical report provides minimal analysis of these locations and does not establish a reliable archaeological baseline.	This has been addressed in GMAG-257 above.

ID	Theme	Representation	Applicant's Response
		16.3.1. Site 1 — the most heavily developed part of the scheme — is barely analysed Site 1 contains the most intrusive elements of the entire project. Yet the geophysical report provides: • almost no narrative discussion of Site 1 • no interpretation of anomalies within it • no assessment of archaeological potential • no evaluation of risk to heritage assets This is a fundamental omission given the scale of excavation proposed.	
GMAG-259	Cultural Heritage	16.3.2. Streaking and interference likely caused by existing power infrastructure may have masked archaeology The report acknowledges “streaking” and “data artefacts”. Given the presence of • overhead power lines • buried services	The Applicant notes any potential limitations to the geophysical survey have been acknowledged within ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022].

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		- pylons - modern utilities in and around Site 1 and Site 2, this interference could easily have: - masked weaker archaeological features - obscured linear features - reduced the clarity of settlement evidence The report does not quantify the extent of this masking or assess its implications for the reliability of the survey in the Great Moulton area.	
GMAG-260	Cultural Heritage	16.3.3. "Undetermined anomalies" are identified but not investigated The survey identifies: "an unusual, large complex of localised anomalies... classed as 'Undetermined'." However, the report does not: - map these anomalies clearly - confirm whether any lie within Site 1 or Site 2	The Applicant notes that ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022] provides Figures of identified anomalies overlaid on historic mapping to provide context. It is further noted that the ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] that geophysical survey is not the lone non-invasive technique utilised within the assessment of archaeological potential. Entries from Norfolk Historic Environment Record, as well as LiDAR visualization, as detailed within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], in addition to aerial

ID	Theme	Representation	Applicant's Response
		• assess their archaeological potential • recommend trenching • evaluate their significance determine whether they lie beneath the substation or BESS footprint This is a Regulation 14 failure: unexplained anomalies must be investigated before the ES is finalised.	photography analysis, as detailed within ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024] have also referenced. Principle 7 of <i>Archaeological and Solar Farms. Good Practice Guide</i> (ALGAO et al. 2026) notes that high-quality non-intrusive evaluation is critical to developing an understanding of archaeological potential at a landscape scale. The Applicant notes that as outlined in both ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHES that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme.
GMAG-261		6.3.4. No correlation between anomalies and the development footprint The report does not show: • where anomalies lie relative to the National Grid Substation • where anomalies lie relative to the BESS	The Applicant notes that while a Figure illustrating the results of the geophysical survey overlaid on the Scheme has not been provided within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], the results of ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022] were considered when siting the trial trenches undertaken in ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172], and the results of both utilised as part of the

ID	Theme	Representation	Applicant's Response
		- where cable trenches intersect archaeological features - where haul roads cross sensitive areas Without this, the ES cannot assess archaeological impact in the Great Moulton area.	production of ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173] . The location of different elements (i.e. Solar PV Arrays, BESS and Sub-Station structures) of the Scheme within Site 1, Site 2 and the BESS were also considered as part of the impact assessment in [APP-046] .
GMAG-262	Cultural Heritage	16.3.5. Survey coverage in Site 1 and Site 2 is inconsistent and may be unreliable The survey in these areas was: - conducted months apart - undertaken with different equipment configurations - affected by ploughing artefacts - affected by streaking - affected by modern interference This results in a non-uniform dataset with variable sensitivity, meaning weaker archaeological features may not have been detected.	The Applicant notes that within Section 6 of ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [APP-022], the technical specifications of the survey have been detailed. It is considered that the though the survey works were carried out across a number of months between 2024 – 2025, as a GNNS positioned fluxgate magnetometer survey has been carried out, there would be no variation in the results, despite the timespan of the survey itself. Likewise, despite different units being utilized across the survey works, all changes would have been accounted for during the calibration of the survey equipment, as well as during the subsequent processing of the data.

ID	Theme	Representation	Applicant's Response
GMAG-263	Cultural Heritage	16.3.6. No assessment of archaeological significance or impact for Site 1 and Site 2 The report does not: • assess the significance of any features in Site 1 or Site 2 • assess the impact of deep excavations • assess the impact of cable trenching • propose mitigation • recommend preservation in situ • identify areas requiring trenching This is a fundamental omission for the most heavily developed part of the scheme.	The Applicant notes that the assessment of significance and impacts for Site 1 and Site 2 has been included within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046], and is supported by ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024] and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172]. These assessments have noted the potential impacts from Scheme within Site 1 and Site 2. In consultation with NCCHES, and outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHES that the amount and location of any additional trenching will be targeted on areas of higher impact, and will be proportionate to the cumulative impact of all elements of the Scheme. The assessment concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, and all residual adverse effects equates to 'less than substantial harm' in terms of the NPSs EN-1 and EN-3, and a 'low level of harm' in NPPF (August 2026) terms.

ID	Theme	Representation	Applicant's Response
GMAG-264	Cultural Heritage Ecology and Biodiversity	16.3.7. Ecological Baseline Confirms High Archaeological Potential and Geophysical Limitation The ecological baseline presented in ES Appendix 8.1 provides important contextual evidence that directly reinforces the archaeological concerns raised in this chapter. The BESS Sub-Site and Sub-Site 1 contain species-rich hedgerows, veteran oak trees, historic ditches, ponds, woodland belts, and tussocky arable margins managed under Countryside Stewardship (AB1). These features are characteristic of a long-established historic landscape, where archaeological remains are more likely to survive due to reduced soil disturbance and continuity of land use The presence of hedgerows, woodland edges, wet ditches, tall vegetation and tree root systems is also known to interfere with magnetometer surveys, reducing sensitivity and masking weaker archaeological features. The ecology survey additionally confirms the presence of an in-field pylon within Site 1, which is likely to have contributed to the “streaking” and magnetic	The Applicant notes any potential limitations to the geophysical survey have been acknowledged within ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022]. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] addresses potential direct impacts to historic landscape character. It is widely acknowledged that that features, such as hedgerows, woodland edges, wet ditches, tall vegetation, and tree root systems can cause impacts upon resistivity surveys; however, as noted within ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], a GNNS positioned fluxgate magnetometer survey was employed across the Scheme, and it is considered that as the vegetation is not magnetic, its presence will have had no impact upon the results of the geophysical survey.

ID	Theme	Representation	Applicant's Response
		interference noted in the geophysical dataset. The geophysical report does not acknowledge these limitations or assess their impact on data quality. Taken together, the ecological evidence indicates that Site 1 and Site 2 possess high archaeological potential, while simultaneously containing multiple features that would compromise the reliability of magnetometer survey results. The applicant has not integrated these datasets or addressed the implications for the archaeological baseline.	
GMAG-265	Cultural Heritage	16.3.8. Absence of Archaeological Evidence for Little Moulton and the Depwade Hundred Boundary Historic records confirm the existence of Little Moulton, a medieval settlement located immediately north of Site 1, adjacent to Hundred Lane, which marks the boundary of the historic Depwade Hundred. Hundred boundaries are ancient administrative divisions that typically follow long-established trackways and settlement edges and are	The Applicant notes the historic and archaeological background of the area has been provided within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], and includes the area of the former hamlet of Little Moulton. While it is acknowledged that non-invasive survey works (e.g. geophysical survey and aerial mapping) are not infallible, and will not identify all feature types, it is, however, very useful in identifying the principal concentrations of archaeology, and there is no reason to believe this is not the case. As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of informative trenching will be undertaken within the

ID	Theme	Representation	Applicant's Response
		therefore of high archaeological significance. Despite this, the geophysical survey reports no archaeological features whatsoever in the area surrounding Little Moulton or Hundred Lane. This is highly implausible, given the documented medieval occupation and the expected presence of boundary ditches, enclosures, pits, trackways and domestic activity. The failure to identify any such features strongly suggests that the geophysical survey is incomplete, masked by interference, or inadequately interpreted. The applicant does not discuss Little Moulton, does not map it, and does not assess its archaeological implications. No trenching is proposed to investigate this historically attested settlement. This omission represents a significant flaw in the archaeological baseline.	remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHEs that the amount and location of any additional trenching will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme.
GMAG-266	Cultural Heritage	16.3.9. Omission of All Saints Church, Little Moulton and the Depwade Hundred Boundary The applicant's own mapping shows All Saints Church, located immediately	The Applicant notes the historic and archaeological background of the area has been provided within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], with section 4

ID	Theme	Representation	Applicant's Response
		north of Site 1, yet the archaeological assessment makes no reference to it. Parish churches are central to medieval settlement patterns and are typically associated with burial grounds, domestic plots, trackways and long-term occupation. The omission of All Saints Church from the archaeological narrative is a serious methodological failure. Similarly, the documented medieval settlement of Little Moulton and the Depwade Hundred boundary are not discussed anywhere in the geophysical report or ES Chapter 10. These features are key indicators of archaeological potential, yet the applicant provides no assessment of their significance, no correlation with geophysical results, and no explanation for the absence of archaeological features in their vicinity. The complete lack of archaeological evidence in an area where medieval settlement is historically attested is not credible. Combined with the known limitations of the magnetometer survey in Site 1 and Site 2, this omission further undermines the reliability of the	of this assessment including discussion of the former All Saints Church and area of Little Moulton.

ID	Theme	Representation	Applicant's Response
		archaeological baseline. The ES cannot therefore demonstrate that the scheme avoids or minimises harm to archaeological heritage in the Great Moulton area.	
GMAG-267	Cultural Heritage	16.3.10 Selective Use of LIDAR in Place of Tithe Mapping for Site 1 GMAG notes a highly irregular and unexplained methodological inconsistency within the Archaeological Desk-Based Assessment (Appendix 10.2). For every other sub-site within the scheme, the applicant presents tithe maps as part of the historic mapping baseline. Tithe maps are a fundamental dataset for understanding historic settlement patterns, field systems, land ownership, and the evolution of the rural landscape. They routinely reveal former buildings, medieval enclosures, trackways, and parish structures that are no longer visible on the ground. However, for Site 1 and Site 2 around Great Moulton, the applicant does not present the tithe map. Instead, uniquely for this area alone, the DBA substitutes the tithe map with LIDAR imagery. LIDAR is a valuable tool for identifying	The Applicant notes that extracts from the Moulton St Michael Enclosure and Tithe Maps as well as the Tivetshall St Margaret Enclosure and Tithe Maps and Stratton St Mary Tithe Map have been included as Figures 3-7 within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021]. Plot 345 of the 1837 Moulton St Michael Tithe is recorded, as detailed within para. 4.44 of [AS-020 – AS-21] as 'Sanctuary Field', which was thought to be a reference to the former Church of All Saints. Figure 9 of [AS-020 – AS-021] separately shows full LiDAR coverage for Sites 1, 2 and BESS. No features were identified within the area of the former Church of All Saints.

ID	Theme	Representation	Applicant's Response
		earthworks, but it cannot show historic field boundaries, former buildings, medieval settlement plots, or the structure of the tithe apportionment. In a landscape that has been under long-term arable cultivation, LIDAR will inevitably show nothing, even where buried archaeology survives. The effect of this substitution is that the historic landscape around Great Moulton — including the documented medieval settlement of Little Moulton, the historic field system, the relationship to All Saints Church, and the alignment of Hundred Lane marking the Depwade Hundred boundary — is entirely absent from the applicant's assessment. This omission is particularly concerning given that these features are central to understanding the archaeological potential of Site 1 and Site 2. The selective replacement of tithe mapping with LIDAR in the one area where the tithe map would reveal medieval settlement structure is a serious methodological flaw. It has the effect of concealing key historic landscape evidence and further	

ID	Theme	Representation	Applicant's Response
		undermines the credibility of the archaeological baseline presented in the ES.	
GMAG-268	Cultural Heritage	16.3.11. Evidence from DBA Version 2 Demonstrates Systematic Under-Reporting of Archaeological Potential in Site 1 DBA Version 2 (Appendix 10.2 Part 1) provides detailed descriptions of the historic mapping for Great Moulton, including the Moulton St Michael tithe map (1837), the 1820 enclosure map, and early Ordnance Survey mapping. These sources clearly identify the location of Sanctuary Field (Plot 345), the documented site of All Saints Church, as well as surviving medieval strip fields, a north–south historic road running through Sub-Site 1B, and the alignment of Hundred Lane, marking the Depwade Hundred boundary. The DBA text acknowledges these features explicitly and confirms their relevance to the historic landscape of Great Moulton. However, despite this, the applicant does not present the tithe maps visually for Site 1 and Site 2, in contrast to the consistent use of tithe mapping for other	The Applicant notes that extracts from the Moulton St Michael Enclosure and Tithe Maps as well as the Tivetshall St Margaret Enclosure and Tithe Maps and Stratton St Mary Tithe Map have been included as Figures 3-7 within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021]. The Applicant further notes that the possible site of All Saints Church, as identified within Sub-Site 1B by the HER and detailed in ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], as well as the results of the geophysical survey (ES Chapter 3, Appendix 10.3 – Archaeological Geophysical Survey [APP-022]), was identified during the course of the assessment, with this area subject to targeted trial trenching, as detailed in ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-173]. The evaluation within this area identified no evidence of a medieval Church, with the only features revealed relating to elements of a long-lie field system with likely origins in the medieval period and continued use and reorganization into the post-medieval era.

ID	Theme	Representation	Applicant's Response
		sub-sites within the scheme. Instead, uniquely for the Great Moulton area, the applicant substitutes the tithe maps with LIDAR imagery, a dataset incapable of illustrating historic field systems, former buildings, medieval settlement plots or tithe apportionments in a long-ploughed arable landscape. This substitution ensures that the medieval settlement pattern, which is clearly visible on the tithe maps, is not visible in the figures presented to the Examining Authority. DBA Version 2 further acknowledges that Sub-Site 1B contains the site of the former medieval church, that medieval pottery has been recovered from the surrounding fields, and that medieval settlement associated with the church may survive below ground. These statements directly contradict the geophysical survey, which reports no archaeological features in this area and fails to mention the church, the medieval settlement, the strip fields or the Hundred boundary. The geophysical report also does not correlate its results with the historic mapping evidence described in the DBA, nor does it address the known interference from	

ID	Theme	Representation	Applicant's Response
		pylons, hedgerows, ditches and vegetation that would have masked weaker archaeological features. The inconsistency between the detailed historic evidence acknowledged in DBA Version 2 and the absence of corresponding analysis, mapping or interpretation in the geophysical survey demonstrates a systematic under-reporting of archaeological potential in Site 1. The selective omission of tithe mapping, the reliance on LIDAR imagery, the failure to integrate historic and geophysical datasets, and the contradictory conclusions between the DBA and the geophysics collectively undermine the credibility of the archaeological baseline for the Great Moulton area. This pattern of omission raises legitimate concern that the historic landscape of Site 1 has been deliberately obscured.	
GMAG-269	Cultural Heritage	16.4. Implications for Heritage Assets and Setting Because the archaeological baseline for Sites 1 and 2 is incomplete, the ES	As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHES that the amount and location of any additional trenching

ID	Theme	Representation	Applicant's Response
		cannot demonstrate that the scheme avoids or minimises harm to: - below-ground heritage assets - the historic landscape around Great Moulton - the setting of nearby listed buildings and historic farmsteads The heritage conclusions in ES Chapter 10 are therefore unreliable.	will be targeted on areas of higher impact and will be proportionate to the cumulative impact of all elements of the Scheme. The archaeological fieldwork is not considered to contribute to the setting of nearby listed buildings or historic farmsteads.
GMAG-270	Cultural Heritage	16.5. Implications for Construction Impacts Deep excavations for: - the National Grid Substation - the BESS - cable trenches - haul roads - Compounds pose a high risk of destroying archaeological remains that have not been identified due to deficiencies in the geophysical survey. The ES does not assess this risk.	Construction phase works which would directly impact archaeological remains have been assessed within paragraphs 10.8.5 – 10.8.17 of ES Volume 1, Chapter 10 – Cultural Heritage (APP-046). As noted within Section 10.9 of the ES Chapter, the mitigation measures for the archaeological resource within the Site will be secured via a requirement of the DCO and are detailed in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]. It is further noted in paras. 10.9.3-10.0.4 of the ES Chapter that <i>'areas of known extensive impact (National Grid Substation and Project Substations, BESS and Temporary Construction Compounds) will be subject to informative trenching at 3.5% by area. Informative trenching will be undertaken in the remaining areas of the Site not subject to previous trenching. It has been agreed with NHES that the amount and location of any additional trenching will be targeted on areas of higher</i>

ID	Theme	Representation	Applicant's Response
			<i>impact and proportionate to the overall impact. As such, the amount and location of the trenches can only be confirmed following detailed design.'</i>
GMAG-271	Cultural Heritage Construction	16.6. Misclassification of Construction Duration The ES labels construction-phase heritage setting impacts as "short-term", despite a construction period of 18–24 months. Multi-year construction lighting, plant, traffic and visual intrusion cannot be described as short-term under Historic England's GPA3 or The Setting of Heritage Assets. This misclassification reduces the assessed significance of harm to heritage setting.	The Applicant acknowledge that construction duration will be 18-24 months. As detailed within Chapter 2, for purposes of the assessment, the construction phase effects may result from activities during site preparation, enabling works and also construction and commissioning activities. This covers sources of effects such as construction traffic, construction activity noise and vibration, dust generation, site runoff, mud on roads, risk of fuel and oil spillage and the visual intrusion of plant and machinery on Site. The duration of construction-related effects will be different for different activities. For example, impacts related to earth moving are likely to be short in duration compared with the construction of energy infrastructure or landscaping activities. The Applicant notes that the Historic England guidance <i>The Setting of Heritage Assets</i> solely references the 'Anticipated lifetime/temporariness' of a development and does not make any distinction between 'short-term' or 'long-term' impacts.
GMAG-272	Cultural Heritage	16.6. Conclusion The archaeological baseline for Site 1 and Site 2 — the areas surrounding	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is supported by ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 –

ID	Theme	Representation	Applicant's Response
		Great Moulton — is incomplete, inconsistent and unreliable. The geophysical survey provides almost no meaningful analysis of the very locations where the deepest excavations will occur, including the National Grid Substation, the BESS, the POC and associated cable corridors. Interference from pylons, hedgerows, woodland belts, wet ditches, tall vegetation and modern infrastructure has not been acknowledged or assessed, despite clear evidence that these factors would have reduced the sensitivity of the magnetometer survey and masked weaker archaeological features. The ecological baseline confirms that Site 1 and Site 2 lie within a historic, well-preserved landscape characterised by species-rich hedgerows, veteran trees, historic ditches, ponds and Countryside Stewardship field margins — all indicators of high archaeological potential. Yet the applicant has not integrated this evidence into the archaeological assessment. Most significantly, the applicant has entirely omitted any discussion of All	AS-021], ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS024] and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172]. The Applicant considers that these assessments have been undertaken in accordance with the appropriate guidelines. These assessments together present a detailed assessment of the known and potential archaeology within Site 1, Site 2 and the BESS and has assessed the potential impact of the Scheme on archaeological assets and, where required, appropriate mitigation has been secured in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]. It noted that that geophysical survey is not the lone non-invasive technique utilised within the assessment of archaeological potential. Entries from Norfolk Historic Environment Record, as well as LiDAR visualization, as detailed within ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], in addition to aerial photography analysis, as detailed within ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024] have also referenced. Principle 7 of Archaeological and Solar Farms. Good Practice Guide (ALGAO et al. 2026) notes that '<i>high-quality non-intrusive evaluation is</i>

ID	Theme	Representation	Applicant's Response
		Saints Church, the documented medieval settlement of Little Moulton, and the Depwade Hundred boundary along Hundred Lane. These features are central to understanding the historic landscape of Great Moulton and should have been key anchors for archaeological interpretation. The complete absence of archaeological features in an area where medieval settlement is historically attested is implausible and indicates that the geophysical survey is either incomplete, compromised by interference, or inadequately interpreted.	<i>critical to developing an understanding of archaeological potential at a landscape scale.'</i>
GMAG-273	Cultural Heritage	GMAG also notes a highly irregular methodological inconsistency within the Archaeological Desk-Based Assessment (Appendix 10.2). For every other sub-site within the scheme, the applicant presents tithe maps as part of the historic mapping baseline. However, uniquely for the Great Moulton area, the tithe map is omitted and replaced with LIDAR imagery, a dataset incapable of illustrating historic field systems, former buildings, medieval settlement plots or tithe apportionments in a long-ploughed arable landscape. The effect of this	This has been addressed in GMAG-267.

ID	Theme	Representation	Applicant's Response
		substitution is that the historic landscape around Great Moulton — including Little Moulton, the medieval field system, the relationship to All Saints Church and the Depwade Hundred boundary — is entirely absent from the assessment. This selective presentation of evidence further undermines the credibility of the archaeological baseline and raises concern that Site 1 has been deliberately under-represented.	
GMAG-274	Cultural Heritage	DBA Version 2 confirms that the applicant had full access to the historic mapping evidence for Great Moulton, including the Moulton St Michael tithe map (1837), the 1820 enclosure map, and early Ordnance Survey mapping. These sources clearly identify Sanctuary Field (Plot 345), the site of the former medieval church, surviving medieval strip fields, a north–south historic road through Sub-Site 1B, and the alignment of Hundred Lane. Yet none of this evidence is presented visually in the figures for Site 1, nor is it correlated with the geophysical survey. The geophysics report fails to mention the church, the medieval settlement, the strip fields or the Hundred boundary, and does not	This has been addressed in GMAG-268.

ID	Theme	Representation	Applicant's Response
		address the known interference that would have masked archaeological features. The inconsistency between the detailed historic evidence acknowledged in DBA Version 2 and the absence of corresponding analysis or interpretation in the geophysical survey demonstrates a systematic under-reporting of archaeological potential in Site 1. Taken together, these deficiencies mean that the Environmental Statement does not provide a credible or Regulation-14-compliant archaeological baseline for the Great Moulton area. The ES cannot demonstrate that the scheme avoids or minimises harm to archaeological heritage, nor can it reliably assess the impacts of deep ground disturbance associated with the substation, BESS and cable infrastructure. The archaeological assessment cannot therefore be relied upon in the planning balance.	
GMAG-275	Cultural Heritage	Planning Weight Given the scale of the omissions, inconsistencies and methodological failures identified in this chapter, the archaeological assessment for Site 1	ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is supported by ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021], ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022], ES

ID	Theme	Representation	Applicant's Response
		and Site 2 must be afforded very limited weight in the planning balance. The applicant has not provided a Regulation-14-compliant archaeological baseline for the Great Moulton area. Key datasets — including tithe mapping, historic settlement evidence, the location of All Saints Church, the medieval field system and the Depwade Hundred boundary — have been selectively omitted from the visual figures, despite being acknowledged in the text of DBA Version 2. The geophysical survey is incomplete, compromised by interference, and fails to correlate with the historic mapping evidence that the applicant demonstrably possessed. This pattern of selective presentation and under-reporting means the ES cannot reliably demonstrate that archaeological harm has been identified, assessed or avoided. Substantial negative weight must therefore be applied to the archaeological impacts of the scheme.	Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023 – AS-024] and ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172]. The Applicant considers that these assessments have been undertaken in accordance with the appropriate guidelines. As outlined in ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173], further stages of informative trenching will be undertaken within the remaining areas of the Scheme not already subject to previous trenching. It has been agreed with NCCHES that the amount and location of any additional trenching will be targeted on areas of higher impact, and will be proportionate to the cumulative impact of all elements of the scheme. ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] is also supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168]. The Applicant considers that these assessments have been undertaken in accordance with the appropriate guidelines.
GMAG-276	Concluding remarks	Final Conclusion GMAG submits that, when applying the planning judgement required under the Planning Act 2008, the proposed	The Applicant notes this and has responded to each concern in previous responses.

ID	Theme	Representation	Applicant's Response
		development at Great Moulton gives rise to substantial, adverse and unacceptable impacts across all environmental topics. These impacts arise not only from the deficiencies of the Environmental Statement, but from the fundamental unsuitability of the site itself for a 400kV National Grid substation, a second project substation, a large BESS compound, overhead lines, gantries, access roads and associated infrastructure. The Environmental Statement does not meet the requirements of Regulation 14 of the EIA Regulations. It fails to provide a complete baseline, omits key receptors, does not assess cumulative effects, and lacks essential modelling for hydrology, noise, lighting, ecology, safety and human health. As a result, the Examining Authority does not have the information required to understand the scale, extent or significance of the impacts arising from the development. Even if the ES were complete, the development would still result in:	

ID	Theme	Representation	Applicant's Response
		- the industrialisation of a tranquil rural landscape - permanent loss of Best and Most Versatile agricultural land - significant harm to residential amenity, including continuous noise, night-time lighting and loss of rural outlook - unacceptable hydrological and groundwater risks within a highly vulnerable Chalk aquifer system - fragmentation of ecological networks and harm to protected species - cumulative impacts far greater than the sum of the individual components - major accident and safety risks, including BESS thermal runaway, transformer fires and contaminated firewater pathways - significant effects on human health and wellbeing, none of which have been assessed. The concentration of high-impact infrastructure within the Great Moulton,	

ID	Theme	Representation	Applicant's Response
		Tivetshall St Margaret and Wacton cluster creates a single industrial complex whose combined effects have not been assessed and cannot be mitigated to an acceptable level.	
GMAG-277	Policy compliance	Across all topics, the scheme is contrary to NPS EN-1, EN-3, EN-5, the NPPF, the EIA Regulations, the Water Framework Directive, Natural England guidance and CIEEM standards. The applicant has not demonstrated that impacts have been avoided, minimised or mitigated, nor that reasonable alternatives have been properly assessed.	The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies. The proposed management and mitigation measures set out in the Environmental Statement (ES) [APP-036 to APP-195] are comprehensive and robust and the Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [APP-209] and Policy Compliance Document [APP-210].
GMAG-278	Cultural Heritage	The archaeological assessment should also be afforded very limited weight, given the selective omission of tithe mapping for Site 1, the inconsistent use of LIDAR, the failure to integrate historic and geophysical datasets, and the absence of a Regulation 14-compliant archaeological baseline for the Great Moulton area.	This has been addressed in GMAG-277.

ID	Theme	Representation	Applicant's Response
GMAG-279	Cultural Heritage	GMAG further submits that the applicant's conclusion that Sites 1 and 2 have "generally low potential" for archaeological remains fundamentally misinterprets the nature of this landscape. The reason this land appears unchanged since the medieval period is not because it lacks value, but because it has never been subjected to modern built development. Aside from routine agricultural drainage and the limited, localised footprint of overhead electricity pylons, the landform, soils and hydrology remain intact. Its shallow chalk aquifer, seasonal waterlogging and winter emergence of groundwater have preserved it as an undisturbed agricultural landscape for centuries. This is not "low potential" land; it is intact land — a rare survival of a medieval agricultural landscape whose archaeological and environmental integrity has been protected by the very hydrological constraints the ES fails to acknowledge. The absence of previous development is not evidence of low value, but evidence of a landscape that has remained unaltered and therefore highly sensitive to disturbance. Covering	This has been addressed in GMAG-277.

ID	Theme	Representation	Applicant's Response
		such land with concrete, foundations and industrial infrastructure would irreversibly destroy a landscape that has quietly endured for hundreds of years.	
GMAG-280	Scheme Description	GMAG also notes that the applicant's repeated use of the generic term "Southern Cluster" fails to acknowledge the presence of the villages of Great Moulton, Tivetshall and Wacton, each of which forms part of a long-established rural settlement pattern. This terminology obscures the identity of the communities affected, does not meet the requirements of Regulation 14 for clear receptor identification, and undermines the transparency required by EN1 and EN5. This lack of clarity contributes to the wider deficiencies in the Environmental Statement and should attract negative weight in the overall planning balance.	The receptors assessed within the ES are defined on a topic-specific basis and set out within the respective topic chapters [APP-042 to APP-056] . Relevant receptors within settlements and communities are identified where pertinent to the assessment being undertaken. The Applicant considers that the ES provides sufficient information to identify the receptors relevant to each assessment.
GMAG-281	Environmental Statement	Given the scale, intensity and permanence of the harm; the sensitivity of the receiving environment; the absence of a lawful Environmental Statement; and the failure to demonstrate compliance with national policy, substantial negative weight must	The Applicant notes this representation. The Applicant draws attention to paragraph 4.1.3 of NPS EN-1, which states that given the level of urgency of need for energy infrastructure (including solar), the Secretary of State 'will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and

ID	Theme	Representation	Applicant's Response
		be attached to the proposal in the planning balance.	relevant policies set out in the relevant NPSs clearly indicate that consent should be refused'. The substantial benefits of the Scheme are summarised within the Planning Statement [APP-209], with likely residual adverse impacts identified in the ES [APP-036] to [APP-195]. For projects that qualify as Critical National Priority (CNP) Infrastructure, such as the Scheme, the need case will likely outweigh the residual effects in all but the most exceptional circumstances.. The Applicant further draws attention to the fact that the DCO Application has been prepared in compliance with the EIA Regulations, as evidenced by the Environmental Statement having been undertaken in accordance with ES Volume 1, Chapter 2 – EIA Methodology [APP-038], and compliance with other legal and regulatory requirements has been demonstrated within the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. The planning balance considering the positive, neutral and negative impacts is set out in the Planning Statement [APP-209]. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy.
GMAG-282	Policy Compliance	GMAG has reviewed the Environmental Statement and all relevant outline management plans submitted by the applicant, including the Outline	The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme complies with relevant national and local planning policies.

ID	Theme	Representation	Applicant's Response
		Construction Traffic Management Plan, Outline OTMP, Outline Battery Safety Management Plan, Outline PRoWPPMP and Outline Employment, Skills and Supply Chain Strategy. None of these documents provide the level of assessment required under Regulation 14 of the EIA Regulations or the policy requirements of NPS EN-1, EN-3 or EN-5. Each is a high-level framework that defers essential information to post-consent stages and fails to assess the likely significant effects of the development as proposed. Key impacts relating to transport, workforce traffic, abnormal loads, safety, hydrology, ecology, landscape, noise, air quality, community amenity, PRoW tranquillity and cumulative construction effects remain unquantified, unmodelled and unmitigated. As a result, the Examining Authority is not presented with the evidence necessary to understand the scale, extent or significance of the environmental impacts arising from the scheme. GMAG therefore submits that substantial negative weight must be attached to these unresolved deficiencies, and that the application	The proposed management and mitigation measures set out in the Environmental Statement (ES) [APP-036 to APP-195] are comprehensive and robust and the Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. The Design Principles, Parameters and Commitments [APP-213] set out the maximum and, where necessary, minimum parameters with the spatial extents shown on the Works Plan [AS-002 and AS-003]. The Scheme has Work Nos as described in Schedule 1 of the Draft DCO and does not have a detailed design at this stage. The Applicant is seeking flexibility in design parameters to allow for technological advancement to maximise energy production. For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage. The EIA has been undertaken in accordance with the Rochdale Envelope approach to assess the maximum parameters and allow for a decision on the technology choice to be made at the point of procurement. The Planning Inspectorate's Advice Note Nine: Rochdale Envelope acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme to be considered.

ID	Theme	Representation	Applicant's Response
		cannot lawfully proceed to consent unless and until a complete, accurate and Regulation 14-compliant assessment is provided On the evidence before the Examination, the statutory requirements of the Planning Act 2008 and the EIA Regulations are not met. The application cannot lawfully proceed to consent.	
GMAG-283		Legal Compliance Summary The Planning Act 2008 remains the governing legislation for Nationally Significant Infrastructure Projects (NSIPs). There have been no amendments that alter the statutory tests for decision-making, compulsory acquisition, environmental assessment, or the duties placed on applicants. The legal framework relied upon in this representation is therefore fully current and applicable. Under sections 104 and 105 of the Planning Act 2008, the Secretary of State may only grant development consent where the application is supported by:	The Applicant notes this representation. The DCO Application has been prepared in accordance with the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, as demonstrated in the Planning Statement [APP-209] and Policy Compliance Document [APP-210]. The Environmental Impact Assessment has been undertaken in accordance with the methodology set out in ES Volume 1, Chapter 2 – EIA Methodology [APP-038], with reasonable alternatives considered in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215]. The acceptance of the DCO Application for Examination by the Planning Inspectorate confirms that the Applicant has fulfilled its statutory duties.

ID	Theme	Representation	Applicant's Response
		• a complete and lawful Environmental Statement • a robust assessment of reasonable alternatives • compliance with relevant National Policy Statements • evidence that adverse impacts have been minimised • a planning balance that is informed, proportionate and based on adequate information The applicant has not met these requirements Under Regulation 14 of the EIA Regulations 2017, an Environmental Statement must include: • a complete and accurate environmental baseline • an assessment of likely significant effects • a cumulative assessment of the whole project	

ID	Theme	Representation	Applicant's Response
		a description of reasonable alternatives and the reasons for selecting the chosen option The Environmental Statement submitted for East Pye does not meet these statutory requirements. It is incomplete, outdated, and does not assess the development now before the Examination.	
GMAG-284	Compulsory Acquisition	Under sections 122 and 123 of the Planning Act 2008, compulsory acquisition powers may only be granted where: - the land is required for the development - there is a compelling case in the public interest - the interference with private rights is proportionate - funding is secure and deliverable The applicant has not demonstrated necessity, proportionality, or funding certainty. The statutory tests for compulsory acquisition are not met.	Please refer to the Applicant's Response at GMAG-011.

ID	Theme	Representation	Applicant's Response
		Taken together, these deficiencies mean that the application does not provide the Examining Authority with the information required to undertake a lawful assessment. The Planning Act 2008, the EIA Regulations and the relevant National Policy Statements all require a complete, accurate and environmentally robust evidence base. That evidence base is not present. Substantial negative weight must therefore be attached to the applicant's case.	

6.1 Great Moulton Evangelical Chapel

Table 2.11 Applicant's Response to Great Moulton Evangelical Chapel [\[RR-0706\]](#)

ID	Theme	Representation	Applicant's Response
GMEC-001	Cumulative impact	Severe Cumulative Impacts Introduction and Core Ground for Objection The Trustees and Congregation of the Great Moulton Evangelical Chapel formally lodge their strong objection to the East Pye Solar Project proposed by Island Green Power. While we support the wider national transition toward clean energy, the unprecedented scale and placement of this development—particularly the Great Moulton southern cluster—will cause disproportionate, irreparable harm to our place of worship. Critically, when evaluated alongside the separate, adjacent 400MW Field Long Stratton BESS proposal (Application 2025/1689), the cumulative industrialisation of this tiny rural parish becomes entirely unsustainable and legally unacceptable.	The technical chapters of ES Volume 1 [APP-042 to 054] presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The ES is considered to meet the requirements of Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Application 2025/1689 is included within the cumulative developments assessed within the ES, as detailed within ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116].

ID	Theme	Representation	Applicant's Response
GMEC-002	Community impact	Threat to Community Cohesion and Loss of the Core Congregation The sheer duration of these overlapping projects presents an existential threat to the survival of our faith community. Loss of Parishioners and Blight: The prospect of a gruelling, multi-year construction phase followed by a 40-year operational lifespan is already causing severe anxiety within our village. We are deeply concerned that the prolonged disruption, noise, and visual blight will force long-standing parishioners to sell their homes and leave Great Moulton entirely. Irreparable Damage to Church Survival: As an independent village chapel, our survival relies entirely on our local congregation. If families and elderly residents move away to escape the industrialization of the village, it will permanently erode our membership. This directly threatens the financial and spiritual viability of the Chapel, potentially forcing the permanent closure of a historic asset.	Assessment of noise and vibration effects are presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The receptors most representative of Great Moulton are NSR1A and NSR1B, which lay to the south of Great Moulton. Construction noise effects are expected to be short-term negligible/minor adverse and not significant, with construction noise levels being below the measured ambient sound level at NSR1A and NSR1B. Operational effects during the daytime, night-time and early morning are expected to be long-term negligible and not significant, with rating levels being below the background sound levels at NSR1A and NSR1B. The Equality Impact Assessment [APP-214] recognises that community cohesion, access to services, social inclusion and mental wellbeing are relevant equality considerations. It identifies that construction activities, including road closures, diversions and temporary changes to Public Rights of Way (PRoW), could affect access to community facilities and services, particularly for older people, disabled people, children, people without access to

ID	Theme	Representation	Applicant's Response
		Loss of an Essential Social Lifeline: Beyond our pilgrimage duties, we host vital local support services, including coffee mornings and social outreach that combats rural isolation. Driving residents out of the village destroys the very community fabric we are called to support.	private vehicles, and those who rely on walking, public transport or PRoW. However, the assessment identifies mitigation measures, including the Outline CTMP [APP-201] and Outline Public Rights of Way and Permissive Paths Management Plan (Outline PRoWPPMP) [APP-203], which are intended to minimise disruption, maintain access where practicable and support community connectivity.
GMEC-003	Noise and Vibration	Detrimental Acoustic Impacts on Faith and Hub Activities The introduction of industrial-scale electrical components introduces a continuous and severe noise profile that is completely incompatible with a place of worship and pilgrimage. Continuous Operational Drone: The constant low-frequency drone from inverters, transformers, and the extensive cooling fan networks required for the nearby BESS will strip the Chapel of its utility as a quiet sanctuary. This ambient industrial noise will actively disrupt Sunday services, mid-week	Assessment of noise and vibration effects are presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. The receptors most representative of Great Moulton are NSR1A and NSR1B, which lay to the south of Great Moulton. Construction noise effects are expected to be short-term negligible/minor adverse and not significant, with construction noise levels being below the measured ambient sound level at NSR1A and NSR1B. Operational effects during the daytime, night-time and early morning are assessed to be long-term negligible and not significant, with rating levels being below the background sound levels at NSR1A and NSR1B.

ID	Theme	Representation	Applicant's Response
		prayer groups, and the quiet reflection sought by visiting pilgrims Severe Construction Noise Impact: The multi-year construction window will inflict unpredictable, high-decibel noise (such as framework pile-driving and heavy machinery). This noise will easily penetrate our historic building, making periods of quiet contemplation and community gatherings impossible. Peace and silence are functional, active requirements for our hub's survival.	The assessment of low frequency sound has been undertaken at receptors closest to the Project Substations, new National Grid Substation and BESS areas. Noise levels at receptors located further away have been reviewed, but impacts have not been reported unless they were determined to have a greater than negligible impact. The assessment has been undertaken at receptors: • NSR2A • NSR2B • NSR3A • NSR3B • NSR21 • NSR29 • NSR44 • NSR77 The assessment results are presented in ES Volume 3, Appendix 12.2 - Noise Modelling and Calculations [APP-179]. The assessment concludes that low frequency sound levels at the above receptors are below the NNR45 criterion

ID	Theme	Representation	Applicant's Response
			and therefore require no modification to the outcome of significance.
GMEC-004	Transport and Access Construction Impact	Cumulative Lifecycle Risks to Elderly Parishioners and Pilgrims The prolonged nature of both the construction and operational phases presents an unacceptable, long-term safety hazard to walkers on roads with no pedestrian pavements. Disproportionate Risk to Vulnerable Pedestrians: The vast majority of our local parishioners are elderly and walk to the Chapel. Furthermore, pilgrims traversing the routes toward Walsingham use these exact rural lanes on foot. Forcing elderly residents and cross-country walkers with heavy packs to share narrow, unlit lanes with an intense volume of Heavy Goods Vehicles (HGVs) for years on end creates a severe, life-threatening safety hazard.	The Applicant notes the concern regarding the potential effects of construction traffic on pedestrians and recognises the importance of maintaining highway safety for all road users during the construction period. The Equality Impact Assessment [APP-214] acknowledges that construction traffic, including HGV movements, may disproportionately affect some groups, particularly older people, disabled people, children, parents with young children, and those who rely on walking or cycling, including through effects on pedestrian amenity and perceptions of road safety. While the Scheme would operate over the long term, HGV movements would be greatest during the construction phase. Construction traffic associated with the Scheme is not anticipated to route through Great Moulton village past Great Moulton Evangelical Chapel. Accordingly, the Chapel and those accessing it would not be expected to experience direct effects associated with construction traffic routing through the village. The areas closest to Great Moulton comprise Sites 1A, 1B, 1C, 1D and the BESS. Although construction of the Scheme as a whole extends

ID	Theme	Representation	Applicant's Response
			over a two-year period, works associated with these areas would only take place during specific stages of the programme and would not continue for the full duration of construction. Following construction, traffic associated with the operation of the Scheme would be limited. The anticipated operational traffic requirements are set out in the Outline OTMP [APP-202]. As such, the Scheme would not result in local roads being subject to regular HGV traffic over the operational lifetime of the scheme. Construction traffic would be managed in accordance with the Outline CTMP [APP-201], which includes measures to maintain highway safety and manage construction traffic movements during the construction period. In addition, the Outline PRowPPMP [APP-203] sets out measures to maintain access and manage potential effects on users of public rights of way and permissive paths during the construction period. Together, these measures would help maintain safe access for pedestrians and other users of the local highway network.
GMEC-005	Transport and Access	Suppression of Public Rights of Way and Active Travel:	The Applicant notes the concern regarding the potential effects of construction traffic on pedestrians and users of local public rights of way.

ID	Theme	Representation	Applicant's Response
		The intimidation and physical risk caused by constant industrial traffic will actively deter pilgrims from using these historic routes and prevent our elderly members from walking to the Chapel. This will result in enforced isolation locally and the severing of a regionally important spiritual walking network.	As noted in Reference GMEC-004, construction traffic associated with the Scheme is not anticipated to route through Great Moulton village past Great Moulton Evangelical Chapel. On the road links to the south of Great Moulton, where construction traffic is anticipated to route, the potential effects of the Scheme on severance, non-motorised user amenity, non-motorised user delay, and fear and intimidation were assessed within ES Volume 1, Chapter 11 - Transport and Access [APP-047]. The Equality Impact Assessment [APP-214] also recognises that temporary PRow diversions, road closures and construction traffic could affect walking, cycling and access to community facilities, particularly for older people, disabled people, children, young families and those without access to a private vehicle. It also acknowledges that increased traffic flows may affect pedestrian amenity and perceptions of safety, potentially discouraging some people from walking or cycling. However, these effects are expected to be temporary and would be managed through the Outline CTMP [APP-201] and the Outline PRowPPMP [APP-203]. In addition, new permissive paths are proposed to maintain and enhance public access, improve connectivity with

ID	Theme	Representation	Applicant's Response
			the wider PRow network and support access to the countryside. Taking account of these mitigation and management measures, the assessment concluded that effects on these receptors would be negligible.
GMEC-006	Cumulative impact	Severe Cumulative Safety Hazards from Concentrated BESS Installations The Chapel notes with profound alarm that Great Moulton is being targeted for an unprecedented density of high-voltage battery storage. Compounded Industrial Hazard: The East Pye Solar project features its own substantial BESS facility. Simultaneously, the independent Field Long Stratton BESS project seeks to install a massive 400MW battery facility north of Carr Lane/Market Lane, mere fields away from our historic chapel building.	The Applicant notes this comment and has provided responses to the Trustees of Great Moulton Evangelical Chapel's specific comments above. The Applicant welcomes further engagement with the organisation throughout the Examination process. Interested Parties can participate in the Examination in accordance with the procedures set out by the Examining Authority.
GMEC-007	Battery safety	Unacceptable Proximity and Fire Risk: Concentrating two distinct, massive lithium-ion battery sites within the same immediate rural parish boundary multiplies the risk of a thermal runaway	The Applicant has submitted an Outline Battery Safety Management Plan (Outline BSMP) [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs

ID	Theme	Representation	Applicant's Response
		event, toxic plume emission, and chemical explosions. The Norfolk Fire and Rescue Service's specialized infrastructure is not equipped locally to handle concurrent industrial events of this scale. Forcing our elderly congregation and visiting pilgrims to operate within the immediate danger and evacuation zones of two massive BESS clusters is completely irresponsible.	Council (NFCC). The safety objectives for the design of the Applicant's BESS site are listed in Section 1.4 of the Outline BSMP [APP-200]. Section 1.4.2 of the Outline BSMP [APP-200] stipulates: <i>"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> <i>To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i>

ID	Theme	Representation	Applicant's Response
			<i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."</i> Section 4 of the Outline BSMP [APP-200] covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in Appendix B: Battery Energy Storage System (BESS) Fire – Emissions to Air Risk Assessment of the Outline BSMP [APP-200]) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions recorded from a range of LFP battery systems integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude

ID	Theme	Representation	Applicant's Response
			that the “<i>proposed development should not result in any significant adverse impact on public health.</i>” The spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred; therefore, this is a credible worst-case scenario. The Plume Study in Appendix B assesses the battery fire emission impacts on air quality at six worst case fire locations (using the illustrative BESS design in Appendix A) on sensitive receptors within a 1km radius of the BESS Site. Typically, a BESS fire would be a relatively short-term incident. The Plume Study therefore compared predicted concentrations against Acute Exposure Guidance Levels (AEGLs) and Emergency Response Planning Guidelines (ERPGs) which are relevant to short term releases, in addition to National Air Quality Objectives (NAQOs). Based on the factors of distance to the nearest property and the anticipated short-term nature of a fire incident, the assessment in Appendix B concludes that there will not be adverse effects at the closest residential receptor locations because of a BESS fire incident. Since concentrations are already below health thresholds within 1 km, effects beyond this distance i.e. the Chapel

ID	Theme	Representation	Applicant's Response
			location would be even lower and would not influence the assessment conclusions. To validate the final BESS site design, the Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 4.5.13 of the Outline BSMP [APP-200] and secured through the DCO: "at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform

ID	Theme	Representation	Applicant's Response
			inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [APP-200] pre-construction requirements (Section 5). The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032], which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline BSMP [APP-200]. The Draft DCO [AS-032] also requires the relevant planning authority to consult with Norfolk Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
GMEC-008	Transport and Access	Cumulative Traffic and Environmental Strangulation The Environmental Statement for East Pye Solar fails to adequately account for the overlapping construction and	The Applicant notes the concern regarding the potential cumulative effects of construction traffic associated with the Scheme and the Field Long Stratton BESS project. As set out in Section 11.11 of ES Volume 1, Chapter 11 - Transport and Access [APP-047], cumulative effects were

ID	Theme	Representation	Applicant's Response
		operational impacts of the Field Long Stratton BESS project. Gridlock of Rural Lanes: Both projects will simultaneously route heavy HGV construction traffic through the exact same narrow, single-track lanes (such as Market Lane and Carr Lane) surrounding Great Moulton. This overlapping traffic will completely paralyze the local road network, trapping elderly parishioners in their homes, and blocking emergency fire access routes to both the Chapel and the proposed energy sites.	assessed using the information available at the time of the assessment. The Applicant does not agree that construction traffic associated with the Scheme and the Field Long Stratton BESS project would result in overlapping HGV traffic on narrow rural lanes surrounding Great Moulton. Construction traffic associated with the site parcels in the vicinity of Great Moulton, which are located to the south of the village, would access the Scheme via the B1134 Station Road and Lodge Road. In contrast, construction traffic associated with the Field Long Stratton BESS project would access the site via Market Lane and Carr Lane. While there may be overlap in the construction periods of the two schemes, any overlap in traffic movements would principally occur on the strategic and primary road network, including sections of the A140, rather than on the local roads referenced in the representation. The representation's reference to Market Lane appears to relate to Market Lane within Great Moulton. The Scheme would utilise Market Lane located to the west of Saxlingham Green as part of the construction traffic routing strategy and would not route construction traffic via Market Lane in

ID	Theme	Representation	Applicant's Response
			Great Moulton. Carr Lane does not form part of the construction traffic routing strategy for the Scheme. In addition, Section 11.11 of ES Volume 1, Chapter 11 - Transport and Access [APP-047] assessed cumulative effects associated with committed developments, including the Field Long Stratton BESS project. Taking account of the proposed mitigation and management measures, cumulative effects relating to fear and intimidation on and by road users were assessed as negligible. Accordingly, the assessment did not identify significant cumulative transport effects arising from the interaction of the Scheme with other committed developments.
GMEC-009	Hydrology, Flood Risk and Drainage	Compounded Flooding Risks: Great Moulton already suffers from severe surface water pooling. The combined impact of heavy soil compaction from both developments, alongside the massive increase in impermeable surfaces (East Pye's panels and Field Energy's concrete BESS foundations), will completely overwhelm the local agricultural drainage ditches. This presents a severe, unmitigated cumulative flood	The Applicant notes this comment and concerns on flood risk issues in Great Moulton. The Applicant has committed to providing a surface water drainage system including attenuation (design up to and including the 1 in 100 annual probability +45% allowance for climate change rainfall event) which will have a controlled discharge at or less than greenfield rates to adjacent watercourses/ditches. This is set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water

ID	Theme	Representation	Applicant's Response
		threat to the chapel building and its surrounding pathways.	Drainage Strategy [AS-018] and secured through DCO Requirement 11. Therefore, surface water runoff from the BESS and Substation areas adjacent to Great Moulton will be sufficiently managed and will not increase flood risk to the area. As set out in Section 8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018], solar panels installed within the Scheme will be raised up on narrow pile-driven supports which have a negligible impermeable area and will allow overland flows to flow beneath the panels. Solar panel freeboards have been specified and secured within the Design Principles, Parameters and Commitments [APP-213] to ensure that solar panels are raised at a suitable height above any anticipated surface water flood depths.
GMEC-010	Ecology and Biodiversity	Degradation of Local Ecology, Wildlife Habitats, and Biodiversity As a congregation, we hold a deep religious and moral conviction to act as responsible stewards of the natural environment. The proposed scheme directly violates this stewardship by	The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] have been applied to retain, protect and enhance ecological assets. They include for the retention and enhancement of field boundary

ID	Theme	Representation	Applicant's Response
		introducing widespread environmental degradation.	features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of local wildlife. Large areas of intensively managed arable land will be removed from intensive cultivation as a result of the Scheme, with the cessation of fertiliser application, pesticide and herbicide use, and converted to grassland mosaics, managed for the benefit of biodiversity. Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199]. Furthermore, whilst there is no legislative requirement for the Scheme to provide quantifiable Biodiversity Net Gain (BNG), the Applicant has sought to embed BNG into the Scheme design from the early optioneering stages through to submission. Requirement 9 of the Draft DCO secures a commitment to a minimum of 10% BNG. A detailed approach is provided within the Biodiversity Net Gain Report [APP-218] which discusses the Schemes adherence to the biodiversity gain hierarchy, and habitat baseline values and post-construction values are calculated

ID	Theme	Representation	Applicant's Response
			and provided within the Biodiversity Net Gain Statutory Metric [APP-219]. Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199].
GMEC-011	Ecology and Biodiversity	Habitat Fragmentation and Displacement: Enclosing massive tracts of farmland with high security fencing will sever vital wildlife corridors. This industrial barrier will permanently displace established local mammal populations, including deer, brown hares, and badgers, preventing their natural movement across the South Norfolk countryside.	Habitat fragmentation and loss is considered in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]. The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Green corridors are included in the Scheme, such as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. It is only deer species that are considered likely to be directly prevented from freely moving across the Order Limits, however the green corridors left in place will allow them to move across field boundaries within the Order Limits without significant barriers. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors. The indicative alignment of perimeter fencing is shown on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. Details of fencing will need to be submitted and approved by the relevant

ID	Theme	Representation	Applicant's Response
			planning authority in accordance with Requirement 10 of the Draft DCO [AS-032] .
GMEC-012	Ecology and Biodiversity	Threats to Farmland Bird Species: The sweeping loss of open, actively cultivated arable fields will destroy crucial nesting and foraging habitats for declining farmland birds, including skylarks, yellowhammers, and lapwings, which are native to our parish.	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including the breeding bird assemblage and skylarks <i>Alauda arvensis</i> individually. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 -Indicative Masterplan [APP-059] have been applied to retain, protect and enhance ecological assets. They include for the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) birds. Large areas of intensively managed arable land will be removed from intensive cultivation as a result of the Scheme, with the cessation of fertiliser application, pesticide and herbicide use, and converted to grassland mosaics, managed for the benefit of biodiversity including, but not limited to, species of farmland birds, including skylark. A

ID	Theme	Representation	Applicant's Response
			specific skylark mitigation strategy has been detailed that utilises land within the Order Limits to be managed specifically for the benefit of breeding skylarks and to increase the carrying capacity of those fields identified for skylark mitigation e.g. through the provision of skylark plots measuring 16m² of undrilled habitat within the fields. This will help increase the carrying capacity and breeding productivity of these fields and help to accommodate any skylark territories that may have been displaced from the footprint of the solar development. Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199], Research by scientists from the RSPB and University of Cambridge (Copping J P <i>et al.</i> 2025³) 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.

³ Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., & Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated landscape. *Bird Study*, 72(3), 217–222. <https://doi.org/10.1080/00063657.2025.2450392>

ID	Theme	Representation	Applicant's Response
GMEC-013	Ecology and Biodiversity Soils and Agriculture	Aquatic and Soil Pollution: The risk of chemical run-off during construction and the potential leaching of materials over the 40-year lifespan of the panels threaten the water quality of local streams and ponds. Rather than protecting the environment, this scheme threatens to decimate the delicate biodiversity that our congregation deeply values and enjoys around our place of worship.	The ES Volume 1, Chapter 8 Ecology and Biodiversity [APP-044] includes assessment of the Scheme (during construction, once operational and during decommissioning) on important ecological features including ponds, rivers, ditches and other notable habitat types, The Outline CEMP [APP-196], the Outline OEMP [APP-197] and the Outline DEMP [APP-198] set out measures to protect these habitats from altered surface water runoff and pollution to waterbodies during construction, operation and decommissioning respectively. The solar panels will be PFAS free and will be cleaned with distilled water as set out and secured within the Outline OEMP [APP-197] in the Design Principles, Parameters and Commitments [APP-213]. As set out in Section 9 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018], the surface water drainage systems for the BESS, National Grid and Project Substations will incorporate a lined impermeable membrane to prevent the infiltration of runoff from these areas to the strata beneath. Detailed surface water

ID	Theme	Representation	Applicant's Response
			drainage design is secured through DCO Requirement 11.
GMEC-014	Scheme Description	Industrialisation of Agricultural, Heritage, and Pilgrimage Landscape The project seeks to carpet approximately 2,718 acres of open South Norfolk countryside, enveloping our parish.	Regarding the scale of the Scheme, the NPS EN-1 recognises that any reduction in the scale of energy infrastructure, to mitigate adverse effects, may result in a significant operational constraint or reduction in function. For clarity, the total area of Order Limits is 1,212.3 ha (2,996 acres). The Sites, which collectively contain the Solar PV Panels, associated infrastructure including Grid Connection Infrastructure, landscaping, heritage, surface water and biodiversity mitigation areas, are 1,054.1ha (2,598 acres). When Site 6 is excluded, which is given over entirely to biodiversity mitigation, the remaining Sites are 1,036.1ha (2,560 acres) in area. Care has been taken to ensure that all land has been used efficiently. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. The Applicant has considered agriculture, heritage, and landscape within the ES [APP-042 to APP-056] and outlined the measures taken to avoid,

ID	Theme	Representation	Applicant's Response
			mitigate and minimise these impacts as far as possible. ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] presents an assessment on agricultural land quality, soils, local agricultural businesses, food production and the rural economy. A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] . An assessment on heritage assets, including Conservation Areas and listed buildings, is provided in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and the ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168] .
GMEC-015	Cultural Heritage	Loss of Heritage and Pilgrimage Identity: The rural character of this landscape is intrinsically linked to the spiritual, historical, and social history of our Chapel and the Walsingham pilgrimage tradition.	The Applicant notes that an archaeological and historical background of the area has been provided in ES Volume 3, Appendix 10.2 - Archaeological Desk-Based Assessment [AS-020 – AS-021]. Historically, pilgrims would have traversed the landscape to religious sites across the country, and it is possible that early pilgrimage routes may have passed through the area. However, such pilgrimages were suppressed during the Reformation and the Walsingham Pilgrimage was only revived in the early-20th century. Modern established pilgrimage routes do not pass through or near Great Moulton, including the London –

ID	Theme	Representation	Applicant's Response
			Walsingham route, the Norwich – Walsingham route, and the King's Lynn – Walsingham route.
GMEC-016	Soils and Agriculture	Inappropriate Use of Farmland: Replacing food-producing agricultural fields with thousands of dark, glass-and-metal panels destroys the rural amenity we are called to steward. It replaces a historic, open landscape of pilgrimage with a harsh, industrial corridor. Solar infrastructure belongs on commercial rooftops and brownfield sites, not greenfield land.	The comments are noted. The Statement of Need [APP-206] considers the contribution that rooftop solar or smaller decentralised and community energy schemes can make to meeting electricity demand for domestic and commercial users. However, the data shows that reaching the Government's solar capacity ranges through the deployment of only small-scale schemes is not a feasible pathway to a clean energy system. Therefore, large-scale solar schemes are required to achieve net zero and smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, large-scale solar. Brownfield land within 20km of the Point of Connection at both Norwich Main and the proposed National Grid Substation has been considered within the Site Selection Assessment [APP-215], which concludes that there are no brownfield sites sufficient in size to accommodate the Scheme.

ID	Theme	Representation	Applicant's Response
GMEC-017	General comments	Conclusion The Great Moulton Evangelical Chapel urges the Planning Inspectorate and the Secretary of State to refuse Development Consent for the East Pye Solar Scheme. The local and regional impacts—specifically the severe threat to community cohesion through the forced displacement of our congregation, extensive ecological destruction, elevated local flood risks, road safety hazards to our elderly walking parishioners, the disruption of vital community hub services, industrial noise pollution, and BESS hazards—heavily outweigh the benefits of this specific site choice. We request to be kept fully informed of all upcoming hearing dates and deadlines during the Examination process.	The Applicant notes this comment and has provided responses to the Trustees of Great Moulton Evangelical Chapel's specific comments above. The Applicant welcomes further engagement with the organisation throughout the Examination process. Interested Parties can participate in the Examination in accordance with the procedures set out by the Examining Authority.

6.2 Lincolnshire Against Needless Destruction

Table 2.12 Applicant's Response to Lincolnshire Against Needless Destruction [[RR-1132](#)]

ID	Theme	Representation	Applicant's Response
LAND-001	Future engagement	LAND (Lincolnshire Against Needless Destruction) is registering as an Interested Party for the East Pye Solar Project. At this stage we wish to note that we are reviewing the application documents in full and will provide detailed written representations during the Examination. Our initial concerns relate to potential cumulative impacts, landscape and visual effects, grid connection infrastructure, agricultural land use, and the wider implications for the region's energy planning. A full assessment and evidence based submission will follow once we have completed our review.	The Applicant notes this comment and welcomes further engagement with LAND throughout the Examination process.

6.3 Oakridge Environmental Services Ltd

Table 2.13 Applicant's Response to Oakridge Environmental Services Ltd [\[RR-1455\]](#)

ID	Theme	Representation	Applicant's Response
OESL-001	Noise and Vibration	I have been engaged by East Pye Solar campaign group regarding concerns about the Environmental Noise impacts of the operational infrastructure such as sub stations and BESS. We will be assessing the noise impact assessment details, methodology and conclusions and submitting comment on behalf of East Pye Solar Residents group during the examination of the application.	The Applicant notes this comment. The assessment of noise and vibration impacts are presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048] .

6.4 Saxlingham United Charities

Table 2.14 Applicant's Response to Saxlingham United Charities [[RR-1746](#)]

ID	Theme	Representation	Applicant's Response
SUC-001	Transport and Access	I am writing to you to express my deep concern regarding the sudden decision to re-route heavy construction vehicles (AIL) through Saxlingham Nethergate en-route for the development of the East Pye Solar site 7. This has been switched from the route through the nearby village of Hempnall. Can I highlight that Saxlingham Nethergate is a conservation village with many grade 1 and grade 2 listed properties running along The Street and Church Hill.	The Applicant notes the concern regarding the proposed routing of Abnormal Indivisible Loads (AILs) through Saxlingham Nethergate and the potential effects on the village's historic environment, including its conservation area and listed buildings. As set out in the Outline CTMP [APP-201], AIL deliveries would be subject to specific management measures, including detailed route planning, advance coordination with the relevant highway authorities and the implementation of traffic management where required. The proposed AIL route has been carefully developed having regard to the requirements for the safe movement of oversized loads, local highway constraints and the need to minimise disruption to communities along the route. The Outline CTMP [APP-201] states that all AIL movements will be managed by a specialist haulage contractor, and traffic management arrangements will be agreed in advance with National Highways, relevant Local Highway

ID	Theme	Representation	Applicant's Response
			Authorities, structures' owners and the Police where necessary. The Applicant acknowledges the sensitivity of Saxlingham Nethergate as a conservation village and considers that the temporary and infrequent nature of AIL movements, together with the mitigation and management measures secured through the Outline CTMP [APP-201], would minimise potential effects associated with AIL movements.
SUC-002	Transport and Access	This route has been highlighted on the map you have sent to my charity...Saxlingham United Charities. We own the village school car park and nearby allotment site...both of which are at the heart of the village. Both these plots are used daily by the allotment holders and parents and school children and are vital to the village and its community. Under no circumstances should they be subjected to the constant run of heavy construction vehicles and altered in any way.	The Applicant notes the concern regarding the potential impact of construction traffic on community facilities within Saxlingham Nethergate, including the village school car park and allotments. The Applicant notes that general construction vehicles, including HGVs, are not proposed to be routed through Saxlingham. The route via Saxlingham is only proposed for AIL access. The assessment of AIL movements is set out within ES Volume 1: Chapter 11 - Transport and Access [APP-047], the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177] and the Outline CTMP [APP-201]. AIL assessments, including vehicle tracking, have been undertaken to assess the suitability of the proposed routes and access arrangements. AIL

ID	Theme	Representation	Applicant's Response
			movements would be managed by specialist haulage contractors and subject to detailed route planning, surveys and traffic management measures prior to movement.
SUC-003	Transport and Access	I earnestly request that you convey to the powers that be at East Solar, that they look at alternative routes for transporting their construction vehicles to the planned site north of Hempnall (site 7 I believe) or abandon that site altogether.	The Applicant notes the request for alternative construction traffic routes to be considered and for Site 7 not to proceed. Construction traffic routes have been carefully developed taking account of highway characteristics, safety considerations, physical constraints and potential effects on local communities. As set out in the Outline CTMP [APP-201] , construction traffic would be managed through a range of measures designed to maintain highway safety and minimise disruption where reasonably practicable during the construction period. The suitability of Site 7 is considered within the application documents submitted in support of the Scheme. This includes an assessment of baseline characteristics and flows on the road network, alongside an assessment of effects with regards to transport in ES Volume 1, Chapter 11 - Transport and Access [APP-047] . This is supported by the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177] which includes site access design, visibility splays and swept-path analysis.

ID	Theme	Representation	Applicant's Response
SUC-004	Need	May I also point out that our local area is already oversubscribed with Solar and battery storage (BESS) developments and therefore any additional sites would have no benefit to our local community. Anticipating a more positive response.	Section 7.6 and Section 7.7 of the Statement of Need [APP-206] explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035. Further, the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Para. 3.2.6). The Scheme is needed to contribute to meeting <i>“the urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.”</i> (NPS EN-1, Para 3.3.58). Section 7.3 of the Statement of Need [APP-206] also sets out the challenge to deliver net zero regionally, including the reduction of carbon emissions from transport and other non-electricity sector demand in the region. Section 4.3 of the Statement of Need [APP-206] explains that current levels of national electricity demand are expected to double (NPS EN-1, Para. 2.3.7) to electrify these non-traditional sectors. Regional electricity demand is likely to grow at a similar rate to national demand, underpinning

ID	Theme	Representation	Applicant's Response
			Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 (Clean Power 2030 Action Plan, Page 11). This underpins the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand. A BESS is proposed as associated development to the main Solar PV Sites and will support their operation. The benefits arising from the BESS are set out in Sections 5.11, 6.9, and 6.10 of the Statement of Need [APP-206]. Section 7.7 of the Statement of Need [APP-206] also explains that <i>"a large-scale solar development connecting into the existing overhead line between Norwich Main and Bramford provides the potential to help decarbonise electricity demand to the benefit of consumers both locally and nationally."</i>

6.5 Shotesham Action Group

Table 2.15 Applicant's Response to Shotesham Action Group [\[RR-1768\]](#)

ID	Theme	Representation	Applicant's Response
SAG-001	Scheme Description Design Principles	DESIGN PRINCIPLES - Site 8 should not have been chosen for solar panel development. Despite letting the applicant know this point on numerous occasions, the applicant has failed to take any positive action to substantially decrease the environmental impacts on Site 8. National Policy Statement (NPS) EN-1 5.10 (Landscape and Visual) sets out criteria for site selection to take account of the potential impact on the landscape and visual effects on sensitive receptors.	The Applicant notes the concerns raised regarding the selection of Site 8 for solar panel development. The Applicant's approach to site selection is set out within the Site Selection Assessment [APP-215]. The site selection process considered a range of planning, environmental and operational factors, including those set out in NPS EN-1 and NPS EN-3. The Planning Statement [APP-210] and Policy Compliance Document [APP-211] set out how the Scheme complies with NPS EN-1 Section 5.10 (Landscape and Visual). Landscape and visual effects, including on sensitive receptors, are assessed within ES Volume 1, Chapter 7 – Landscape and Visual [APP-043], which provides a full Landscape and Visual Impact Assessment in accordance with GLVIA3 guidance. With regard to design evolution, the Applicant draws attention to the design of the Scheme, including at Site 8, which has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of the siting of

ID	Theme	Representation	Applicant's Response
			infrastructure, as set out in the Design Approach Document [APP-212]. Specific design responses relevant to Site 8 include the exclusion of solar PV panel development within Sub-Site 8A and 8B in proximity to residential properties on Market Lane and Wash Lane and from Shotesham, and Ancient Woodland. Furthermore, a circa 20m offset of solar PV panel development within Site 8A and 8B when in proximity to PRoWs, namely Shotesham FP19 and FP22, to reduce proximity of development, allow for sufficient space for landscape mitigation planting, and reduce potential effects to visual amenity for users of these routes. Following statutory consultation feedback and Historic England input, Solar PV Arrays were removed from the northern part of Sub-Site 8B owing to the elevated topography and prominence of the landscape on the setting of listed buildings, including the Grade II listed Uppgate Green Farmhouse to the north. The minimum offset distances that will be applied to ecological and landscape features, together with residential properties, are secured through the Design Principles, Parameters and Commitments [APP-213] and Works Plan [AS-002 and AS-003].

ID	Theme	Representation	Applicant's Response
			Landscape and visual mitigation measures for Site 8 are set out within the Green Infrastructure Strategy [AS-005] and the Outline LEMP [APP-199], which include the strengthening and reinforcing of existing hedgerows (infill planting, laying and coppicing) together with new tree and woodland planting to provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape measures during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through Requirement 7 in the Draft DCO [AS-032]. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views in the vicinity of Site 8, however considers, for the reasons set out in the Planning Statement [APP-210], that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case as Critical National Priority infrastructure under NPS EN-1.
SAG-002	Scheme Description	Shotesham is a pastoral village lying in the valley of Shotesham Beck, a key tributary of the River Tas. The settlements of Shotesham St Mary, Shotesham All Saints and Shotesham Hall form part of Shotesham	The Applicant has fully considered the landscape value and sensitivity of Site 8 and the surrounding area, including the Shotesham Conservation Area, the local valley landform and the proximity of designated landscapes and ecological sites. The Landscape and Visual Assessment (LVIA)

ID	Theme	Representation	Applicant's Response
		Conservation Area. There are two SSSIs in the village, Shotesham Common lying either side of Shotesham Beck and Little Wood an ancient wood lying close to the south of the village and within 300m of Site 8b and well within the SSSI Impact Zone. The countryside around Shotesham is significantly undulating as it lies in a valley. Shotesham is widely known as an being one of the most attractive villages in South Norfolk. The applicant has chosen to construct solar panels on the side of sloping land (Site 8a) and on top of the hillside (Site 8b) where in both cases the solar panels will be visible to all receptors, including local residents, visitors and villagers using footpaths and road users. Due to the undulating countryside, mitigation is not possible on either of the sites. The applicant has failed to properly consider EN-1 5.10.16-25 (Landscape and Visual) and EN-3 2.10 .85–93 (Landscape, Visual and Residential Amenity) when developing the project and the project has not been designed with the care required.	presented within ES Volume 1, Chapter 7: Landscape and Visual [APP-043] has been undertaken in accordance with recognised professional guidance and has informed the iterative design process throughout the development of the Scheme. The Applicant considers the assessment to be robust, proportionate and appropriate for the scale and nature of the Scheme. Embedded mitigation measures include the use of appropriate setbacks from sensitive landscape and ecological features, including Shotesham Beck and Ringer's Grove. Little Wood, an area of ancient woodland located approximately 300m from Site 8B, would not be directly affected by the Scheme. The Green Infrastructure Strategy [AS-005] has been developed which includes strengthening/reinforcing existing hedgerows and new tree and woodland planting. Such measures would provide visual screening and landscape integration. Residual effect is recorded as part of the LVIA.

ID	Theme	Representation	Applicant's Response
SAG-003	Scheme Description	The provision of solar panels on Site 8a and 8b in the parish of Shotesham is clearly not environmentally appropriate and Site 8 should be removed from the Scheme.	NPS EN-3 explains that the availability of grid connection, suitable irradiance levels, and local topography, among other factors, are factors in the consideration of site selection. A summary of key design changes through the evolution of the Scheme is provided in Table 5.1 of ES Volume 1 Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]. Within Sub-Site 8A, solar PV arrays were removed from Flood Zones 2 and 3, and removed from a field adjacent to Ringers Grove Ancient Woodland. Within Sub-Site 8B, solar PV arrays were removed from the northern part of Sub-Site 8B, to reduce impacts to the setting of listed buildings. The Planning Statement [APP-209] and Policy Compliance Document [APP-210] sets out how the Scheme, including Site 8, complies with relevant national and local planning policies. The Planning Statement [APP-209] demonstrates national policy compliance and how sustainable development has been achieved through the outcomes of the environmental impact assessment, good design and delivery of economic benefits. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme

ID	Theme	Representation	Applicant's Response
			demonstrably shows substantial public benefits (arising from all constituent parts of the Scheme, including Site 8) that outweigh the less substantial harm identified, as set out within the Planning Statement [APP-209] . The Applicant's position is that it would not be consistent with the government's objectives to deliver a scheme which is smaller than that which has been assessed as acceptable on a planning basis.
SAG-004	Public Rights of Way	PUBLIC RIGHTS OF WAY - There are many public rights of way (PRoW) in Shotesham parish and these are very popular due to the scenic countryside and valued tranquillity and views. Boudicca's Way, a National Trail, runs through the village from north to south with a view to the proposed solar panels. PRoW footpath 19 bisects Site 8a and PRoW footpath 22 is adjacent to Site 8b. Both these footpaths will be enclosed with fencing causing loss of the open views previously enjoyed, loss of tranquillity, industrialisation and loss of perception of safety due to enclosure.	The Applicant acknowledges that users of these routes would experience views of the Scheme in some locations and that there would be effects on visual amenity, tranquillity and the rural character currently experienced by footpath users. The residual effects on PRoW users, including those arising from views of fencing and solar infrastructure, have been assessed. These effects have been assessed within ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [APP-149] and ES Volume 1, Chapter 7: Landscape and Visual [APP-043] The Boudicca Way does not interact with Site 8 and at its closest is located 300m from the maximum development parameters of Site 8b. The Boudicca Way traverses a long distance and goes through several landscape character areas. The visual effect of the Scheme are intermittent and affect a relatively limited section of Boudicca Way

ID	Theme	Representation	Applicant's Response
			which is generally located at distance from the Scheme. Effects on visual amenity reduce by distance and existing vegetation, landform and settlement pattern. This is demonstrated in the multiple view locations taken from Boudicca Way as presented in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] and ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [APP-149]. Shotesham Footpaths 19 and 22 are located adjacent to and within Order Limits and as such, visual effects are anticipated and have been assessed accordingly. The Applicant however does not agree that the PRoWs would become enclosed or that users would experience an unacceptable loss of openness. Along Shotesham footpath 22, the Scheme would be located on only one side of the PRoW, with agricultural fields retained on the opposite side. As such, the route would not be enclosed by the Scheme. Along Shotesham footpath 19 the Scheme only interacts with a relatively small section of the footpath, and the wider footpath will not be directly affected. On this relatively small section, the Scheme would be present on both sides of the

ID	Theme	Representation	Applicant's Response
			PRoW, however solar infrastructure has been set back by a minimum of 15m from the footpath (but generally ~20m at this location on both sides). This offset, together with proposed landscape mitigation which includes hedgerow and tree planting shown on the Green Infrastructure Strategy [AS-005] , would maintain separation between users and the Scheme.
SAG-005	Public Rights of Way	Shotesham Action Group has obtained over 550 signatures and addresses of people who regularly use PRoW footpaths in the village strongly objecting to the proposed provision of solar panels on Site 8 as this will completely change the character of the landscape. The applicant has made no attempt to minimise the visual impacts of the development for those using existing PRoW. This is contrary to NPS EN-3 2.10 (Public Rights of Way).	Landscape and visual considerations, including the experience of PRoW users, have been a key consideration throughout the iterative design process. In response to consultation feedback received during the PEIR stage, the design of Site 8 was amended to reduce potential landscape and visual effects. These changes included the removal of solar development from parts of Site 8, including reductions within sub-Site 8B, together with amendments to panel locations in visually sensitive areas. These design changes are documented in ES Volume 1, Chapter 5: Reasonable Alternatives and Design Evolution [APP-041]. The minimum offset distances that will be applied to ecological and landscape features, together with residential properties are secured through the Design Principles, Parameters and Commitments [APP-213] and Works Plan [AS-

ID	Theme	Representation	Applicant's Response
			002 and AS-003]. These have taken into account best practice, feedback during consultation and site-specific environmental conditions informed by surveys and the environmental assessment process. The Green Infrastructure Strategy [AS-005] includes for visual screening and landscape integration. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. The Applicant's position on compliance with NPS EN-3 2.10.32-37 is set out within the Policy Compliance Document [APP-210].
SAG-006	Water Environment	FLOODING IN SHOTESHAM - Shotesham Beck bisects Site 8a and 8b and this small stream is very sensitive to flash flooding. The lower lying part of Site 8a and Market Lane are in Flood Zone 2 and 3 areas. Significant flood events occurred in January 2013, December 2019, 23rd December 2023 and notably on 23rd October 2023 when there was significant flooding downstream in the Shotesham village	The Applicant notes this comment and the concerns in relation to flooding history in proximity to Sub-Sites 8a 8b. It is acknowledged that the fields within these areas of the Order Limits are steep. The proposed use for Sub-Sites 8A and 8B will be solar panels which are located outside of areas of Flood Zones 2 and 3, and outside of areas of higher surface water flood risk as far as reasonably practicable, as set out in Section 8 of ES Volume 3, Appendix 9.1 - Flood Risk Assessment and

ID	Theme	Representation	Applicant's Response
		and Shotesham Common. The cause of the flooding is due to an increase of surface water runoff from around one square kilometre of agricultural fields and Shotesham Beck is the only final receptor for this area. In the winter months the ground is saturated due to the clay nature of the soil and in the summer months the clay soil becomes hard baked. Accordingly flooding is a regular event. Also the south east of England has the highest rainfall intensity, approximately double the rainfall intensity of Scotland.	Outline Surface Water Drainage Strategy [AS-018] and secured within the Design Principles, Parameters and Commitments [APP-213]. The ground across the panel fields will consist of a grass and/or wildflower meadow maintained at a suitable height as secured in Outline LEMP [APP-996]. The provision of this grass cover all year round will significantly improve soil stabilisation and as studies have shown that grass cover has a higher roughness coefficient than bare soil or agricultural use and therefore slows down the rate of runoff flowing down the fields. The solar panel elements of the Scheme will therefore not increase surface water flood risk to properties downstream of sub-Sites 8A and 8B.
SAG-007	Water Environment	The applicant has stated in Appendix 9.1 rev.2 that the incorporation of grassland within the order limits will effectively manage risks of runoff concentration. This statement appears to have been based on a paper 'Hydrologic Response of Solar Farms' by Cook and McCuen and although this maybe the case for a number situations, Cook and McCuen also state that soil type, ground slope and panel angle drip lines can significantly increase runoff volumes. The Applicant appears to have	The Applicant notes this comment and directs the consultee to the response to SAG-006 above.

ID	Theme	Representation	Applicant's Response
		completely ignored this matter. The applicant has identified high ground slope for sites 9, 4b, 7a, 7e, 7f, 8a and 10a -10d	
SAG-008	Water Environment	The applicant also believes the topsoil is permeable. As mentioned above, the ground is not permeable, evidenced by the nature of the topsoil and historical flood events. The Lead Local Flood Authority (LLFA) commented in their letter to Norfolk County Council dated 15 July 2025 that the applicant has underestimated the impermeable area and has not assessed or investigated the ground conditions and the viability of infiltration. Accordingly, it appears likely that surface water runoff is a significant issue and the provision of solar panels on site 8a (and other sloping sites) will exacerbate the risk of flooding in Shotesham and this will lead to a greater risk of flooding on both Market Lane and Shotesham Common (SSSI).	It is not believed nor stated within any documentation submitted by the Applicant that the top soil is permeable. Information gathered within ES Chapter 3: Appendix 16.1 – Ground Conditions Assessment [APP-184-186] shows that the majority of the Order Limits is underlain by the Lowestoft Formation (Diamicton) which is shown by historic boreholes in the vicinity to be clay. The Outline CEMP [APP-196] includes commitments (secured by DCO Requirement 13) to undertake ground investigation and states that <i>"The results of the ground investigation will be used to inform the detailed design of the Scheme"</i>. The impermeable areas for the Scheme (notably the BESS, National and Project Substations) and their outline surface water drainage arrangements are outlined in Section 9 of ES Volume 3: Appendix 9.1 – Flood Risk Assessment Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018]. Detailed surface

ID	Theme	Representation	Applicant's Response
			water drainage design is secured through DCO Requirement 11. The Applicant directs the consultee to SAG-006 for response on impacts of solar panel installation on Sub-Sites 8A/8B on flood risk in the vicinity.
SAG-009	Water Environment	PRIVATE WATER SUPPLIES - In Appendix 9.1 the applicant states 'Private water supplies have potential to be impacted by the Scheme by contaminants through mobilisation of contaminants to surface water and groundwater receptors. Therefore a mitigation strategy has been developed to address such risks during all phases of the Scheme'. The applicant does not appear to have developed a mitigation strategy in their Water Resources Assessment. Figure 16.5 (Location of Private Water Supplies) identifies 35 private water supplies within 250m of all the site boundaries throughout the Scheme. Two supplies within 250m of Site 8b are shown on the plan. In fact there are four supplies serving six dwellings on Baxter's Lane. The applicant has failed to assess this matter adequately.	Solar panels will be PFAS free and will be cleaned with distilled water as outlined in Section 8 of ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] and secured through the Design Principles, Parameters and Commitments [APP-213]. Access tracks will have appropriate surface water drainage and pollution management in place as secured through the Outline CEMP [APP-196], Outline OEMP [APP-197] and the Design Principles, Parameters and Commitments [APP-213]. Construction drainage and pollution management measures are set out in and secured through the Outline CEMP [APP-196]. All known private water supplies (abstractions permitted by the Environment Agency, supplies registered with South Norfolk Council pursuant to the Private Water Supply Regulations 2016, and features within the BGS' water wells dataset) within

ID	Theme	Representation	Applicant's Response
		The private water supply serving Market Lane Farm lies within a ground water recharge area and Source Protection Zone. This may result in a contamination pathway during construction and operation stages. Market Lane Farm is located in Shotesham Beck valley which is likely to be subject to an increased flood risk and increased contamination from solar panel runoff.	the 250m Study Area around sub-Sites 8A and 8B have been assessed. It is noted that (as per the note on ES Volume 3, Figure 16.5 – Locations of Private Water Supplies [APP-105] the private water supplies provided by South Norfolk Council are not reproduced on this figure, as the Council requested this data not be reproduced on the figure due to GDPR concerns These supplies have been assessed within ES Volume 1, Chapter 16 - Ground Conditions [APP-052] (see table 3.11 – with these features identified by their nearest part of the Site, and named “PWS record”).
SAG-010	Landscape and Visual	LANDSCAPE AND VISUAL. - The Scheme has been chosen to be set mostly within the South Norfolk Claylands. This area has a historic and pre-enclosure landscape of small fields. The Tas river Valley and the tributaries create an undulating character. This is unlike the rest of Norfolk which is generally flat. The introduction of industrial scale infrastructure across this landscape would be ruinous in heritage terms and would cause substantial harm to the landscape setting. The	The Applicant acknowledges the sensitivity of the South Norfolk Claylands landscape, including the influence of the Tas Valley and its tributaries, which contribute to the area's distinctive undulating landform and rural character. These characteristics, together with the historic landscape pattern and the relationship of the Scheme to the surrounding landscape, have been considered within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. The Applicant recognises that the Scheme would result in significant adverse effects on the local landscape character of Site 8. These effects are

ID	Theme	Representation	Applicant's Response
		countryside directly south of Shotesham encompassing Sites 8a and 8b has been assessed as 'Valued Landscape' in a report written by Classic landscape Architecture Ltd, reinforcing the reason why site 8 should be removed from the Scheme. Solar panels on Sites 8a and 8b will cause significant adverse effects.	clearly identified within the LVIA and are assessed as Major Adverse and Significant during construction, decommissioning and in operation Year 1. As proposed landscape mitigation establishes and matures, including hedgerow reinforcement and new tree and woodland planting secured through the Green Infrastructure Strategy [AS-005], the magnitude of effect reduces over time. By Operational Year 15, effects on the local landscape character are assessed as Moderate Adverse and Significant. The Applicant has reduced solar development in sub-Site 8B, to reduce the impact on landscape setting on cultural heritage asset, as documented in ES Volume 1, Chapter 5: Reasonable Alternatives and Design Evolution [APP-041].
SAG-011	Landscape and Visual	In Appendix 7.2 the applicant records that site 8 consists of arable fields beside ancient woodland, bounded by Market lane, Brooke Road and Baxter's Lane, surrounded by Ringer's Grove, Little Wood (SSSI), Great Wood, and Baxter's Grove, and bisected by local PRoW with Boudicca's Way nearby. In Appendix 7.3 the Applicant records site 8 as high value, high susceptibility and high sensitivity. The river valley setting	The Applicant agrees that Site 8 is described in ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119] as comprising arable fields adjacent to areas of ancient woodland and situated within a landscape influenced by local woodland blocks, Public Rights of Way, and nearby designated sites. The Applicant also agrees that, as set out in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], Site 8 is assessed as having high landscape value, high susceptibility and high sensitivity.

ID	Theme	Representation	Applicant's Response
		and the open landscape character is proof of this matter.	
SAG-012	Landscape and Visual	Appendix 7.3 records construction effects on open valley character, medium-distance views, rural lanes, PRoW, tranquillity, hedgerows and rural character, and concludes the construction effects on site 8 would be Major and Significant.	The Applicant agrees that Site 8 is assessed as experiencing a Major Adverse Significant landscape effect during the construction phase. This assessment is presented in ES Volume 3, Appendix 7.3 – Landscape Assessment Table [APP-120] and summarised in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] .
SAG-013	Landscape and Visual	Chapter 8 Tables 7.4 – 7.14 assesses the effects throughout the Scheme. For Site 8 Shotesham Action Group disputes the assessed effects and will provide further evidence. In Appendix 7.8 the applicant has arbitrarily chosen to limit Residential Visual Amenity Assessment (RVAA) to within 100m of individual properties. Accordingly only seventeen properties have been identified, of which two did not meet the threshold and were further assessed. In the final judgement, neither properties were thought to be dominated or overwhelmed by the nearby development. Oakdene Cottage on Woodton Road in Shotesham is one of the two properties. Oakdene Cottage is situated in the south east corner of site	The Applicant has prepared a Residential Visual Amenity Assessment (RVAA), as presented in ES Volume 2, Appendix 7.8 – Residential Visual Amenity Assessment [APP-148]. The RVAA has been undertaken in accordance with the Landscape Institute's Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (2019) There is no prescribed or standardised study area for an RVAA. The extent of assessment is determined on a case-by-case basis, taking account of the nature, scale and form of the proposed development, the surrounding landscape context, topography, vegetation and the likely extent of significant visual effects. The Landscape Institute guidance notes that developments comprising large but relatively low-profile structures, including housing developments, road

ID	Theme	Representation	Applicant's Response
		71 and will clearly be dominated by the development. Three residential properties on Baxter's Lane (Golden Eye Barn, Kings Farm and Ley Farm) and one residential property on Market Lane (Market Lane Farm) are all within 200m of the development. They will all be visually impacted. Golden Eye Barn will be significantly visually impacted as the property faces west and north in full view of Sites 8a and 8b respectively. The RVAA assessment limit should be increased to 250m to satisfactorily deal with residential visual impact for the Scheme.	schemes and similar forms of development, are unlikely to require RVAA except potentially for properties in relatively close proximity, generally within the range of approximately 50–250m. The Scheme comprises predominantly low-profile solar PV arrays, together with a limited number of taller elements such as substations and associated infrastructure. Having regard to the characteristics of the Scheme and the surrounding landscape context, the Applicant determined that a 100m study area from the nearest Scheme component represented an appropriate and proportionate basis for identifying properties requiring detailed RVAA consideration. This approach is consistent with the Landscape Institute guidance and reflects professional judgement based on the specific circumstances of the Scheme. The purpose of an RVAA is not to identify all properties from which the development may be visible, nor to assess general visual effects experienced by residents. Rather, it is intended to determine whether the scale and proximity of a development would result in residential visual amenity being affected to such an extent that the property would become an unattractive place in which to live, through effects described as visually overbearing, overwhelming or oppressive.

ID	Theme	Representation	Applicant's Response
			The properties referred to by Shotesham Action Group, including Golden Eye Barn, Kings Farm, Ley Farm and Market Lane Farm, were considered as part of the wider LVIA process. While residents at these locations may experience views of elements of the Scheme, visibility alone does not indicate that residential visual amenity would be so adversely affected as to meet the RVAA threshold of becoming overbearing, overwhelming or oppressive. The Applicant therefore does not consider that extending the RVAA study area to 250m would materially alter the conclusions of the assessment, nor that the properties identified would experience effects of the magnitude required to justify a finding of unacceptable residential visual amenity. The Applicant and the assessment acknowledge that Oakdene Cottage would have views of the Scheme to the north and west of the property. Whilst there would initially be a significant visual effect on views from the upper-floor north-facing windows, the principal living areas and private garden are screened from the Scheme by existing vegetation. In addition, the proposed landscape mitigation would further filter views as it matures, reducing the magnitude of visual effects over time. Consequently, the Scheme would not appear

ID	Theme	Representation	Applicant's Response
			visually overbearing, overwhelming, or oppressive when experienced from Oakdene Cottage.
SAG-014	Ecology and Biodiversity	BARBASTELLE BATS - The Scheme is located in a nationally important bat landscape, with barbastelle bats recorded across the entire area and specifically in Shotesham Little Wood (SSSI). Little Wood ancient wood and local wet meadows provide perfect habitat for barbastelle bats. The recent report by Norfolk Barbastelle Study Group identifies multiple maternity colony core sustenance zones overlapping the entire Scheme area. There is mounting evidence that solar panel development could be harmful to bats. The applicant has not shown that favourable conservation status would be maintained.	The Applicant would refer the reader to the responses BEPS-217. The Applicant agrees with the notable importance of the local barbastelle populations and landscaping and scheme design has taken this into consideration, providing increased field boundary margins and a significantly increased hedgerow linear network for connectivity to wider habitats. Further information is found in ES - Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] as well as ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157].
SAG-015	Ecology and Biodiversity	ECOLOGY AND BIODIVERSITY - Part of Woodton Road in Shotesham has a Roadside Nature Reserve containing rare botany. This narrow single track lane has no adequate passing places for HGV lorries, nor have the majority of lanes proposed for accessing sites 7g-7l and 8a-8b. Damage to hedgerows and field margins throughout the Scheme	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including designated sites for nature conservation (including Roadside Nature Reserves (RNR)) and habitats, including but not limited to hedgerows and watercourse habitats.

ID	Theme	Representation	Applicant's Response
		will be significant. Sites 8a and 8b form part of a wider ecological network. In particular sites 8a and 8b are very close to Shotesham Beck which is a tributary to River Tas a nationally important chalk stream.	The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-7.18] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059], include the retention and enhancement of boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of wildlife. Habitats including woodland, hedgerows and watercourses will be subject to minimum offset distances, with habitat creation and enhancement within these buffer zones. As detailed in ES Volume 1, Chapter 11: Transport and Access [APP-047], Shotesham Road (ATC 09), which continues to the north onto Woodton Road, has a baseline Annual Average Daily Traffic (AADT) of 134, with HGVs accounting for 19% of flows. Woodton Road forms part of the proposed access strategy for Site 5, which will generate a forecast peak daily of 5 HGVs (5 arrivals and 5 departures) and 16 cars / shuttles / LGVs (16 arrivals and 16 departures). The effects on Woodton Road with regards to transport and access are not considered significant, and HGV movements during the temporary construction phase will be managed and mitigated through the

ID	Theme	Representation	Applicant's Response
			measures outlined in the Outline CTMP [APP-201] .
SAG-016	Water Environment Ground Conditions	Contaminants and sediment from the solar fields will be transported to the River Tas system.	The Applicant notes this comment It is acknowledged that the fields within parts of the Order Limits are steep however it should be noted that the existing use for the fields is agricultural where the soil is stirred up during crop harvesting and the land is likely let bare during the winter months when it is wetter. During heavy rainfall, this would lead to sediment/soil mobilisation which may enter ditches and reduce watercourse capacity and result in blockage of any culverts present. The proposed use across the Order Limits is predominantly solar panels. The ground across the panel fields will consist of a grass/wildflower meadow maintained at a suitable height as secured in Outline LEMP [APP-199]. The provision of this grass cover all year round will significantly improve soil stabilisation and as studies have shown that grass cover has a higher roughness coefficient than bare soil or agricultural use and therefore slows down the rate of runoff flowing down the fields. The solar panel elements of the Scheme will therefore not increase flood risk to downstream receptors (including properties). Solar panels will be PFAS free and will be cleaned with distilled water as outlined in section 8 of ES

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			Volume 3: Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] and secured through the Design Principles, Parameters and Commitments [APP-213] . As such, the solar panel element of Scheme will not give rise to significant contamination issues to water receptors.
SAG-017	Ecology and Biodiversity	There are many woods in the immediate area and Little Wood (SSSI) which is very nearby has added importance due to the presence of a barbastelle bat maternity colony. Farmland birds and mammals are in abundance. Brown hares (a protected and priority species) and deer will be prevented from traversing the fields due to the security fencing. Barn Owls (a protected species) who thrive in this area will be vulnerable to the security fencing, particularly fledged barn owls. Biodiversity duty has not been achieved.	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features designated sites for nature conservation, protected and notable habitats and species The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-7.18] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059], include the retention and enhancement of boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of wildlife. Habitats including woodland, hedgerows and watercourses will be subject to minimum offset distances, with habitat creation and enhancement within these buffer zones. Further details with regard barbastelle bats specifically are provided in relation to BEPSG-013

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			The perimeter fencing will allow the large majority of native fauna to pass beneath (via gaps in the fencing) and utilise habitats within the Scheme. Furthermore, unlike standard agricultural fencing present within the Order Limits and local landscape, the fencing surrounding solar compartments will not be fitted with barbed wire etc, which significantly reduces entanglement issues. Green corridors are included in the Scheme, such as along ditches, hedgerows and their surrounding buffers, which allow for the movement of mammals. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors. As a general position, the Barn Owl Trust acknowledge that ground-mounted solar developments have the potential to be of great benefit for the species. (Barn Owl Trust, undated). Standard agricultural post and wire fencing is widely present within the site and wider landscape, the standard deer fencing surrounding solar compartments will not be fitted with barbed wire etc, which significantly reduces entanglement issues compared to the baseline. The indicative alignment of perimeter fencing is shown on ES Volume 2, Figure 4.1 Indicative Masterplan [APP-059]. Details of fencing will need to be submitted and approved by the relevant

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			planning authority in accordance with Requirement 10 of the Draft DCO [AS-032] .
SAG-018	Transport and Access	TRANSPORT AND ACCESS - Norfolk County Council Highways had serious concerns about the construction of the project by using unsuitable single carriageway single track unclassified lanes for HGV access to sites. It has now been proposed to use internal haul roads for sites 7a-7f , 7g- 7l and 8a-8b. This proposal makes little difference, as the single track lanes will still be used to the same extent.	The Applicant notes the concern that the introduction of internal haul roads would not materially reduce the use of local roads by construction traffic. The internal haul road strategy has been developed to reduce the need for construction traffic movements on the local highway network between site areas and, in particular, to avoid construction traffic routing through Hempnall between Sites 7A-7F, 7G-7L and 8A-8B. The suitability of the proposed access arrangements has been demonstrated through swept path analysis. Drawings 333101678-STN-HGN-XX-DR-TR-5500 Sheet 14 and Sheet 19, provided in Appendix C of the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177], demonstrate that access to Sites 7G-7L can be achieved by a 16.5m articulated HGV. Additional vehicle tracking assessments of the access route serving Sites 7G-7L have also been undertaken to inform the access strategy. These demonstrate that a 16.5 m articulated HGV can utilise the route with minimal overhang. In recognition of the constrained nature of the local

ID	Theme	Representation	Applicant's Response
			road network, Abnormal Indivisible Loads (AILs) are not proposed to use this route. Construction traffic would be managed in accordance with the Outline CTMP [APP-201], which includes a range of measures designed to minimise potential conflicts on rural roads. These include temporary traffic management measures, such as temporary traffic controls, traffic signals and the introduction of passing places where required, together with delivery scheduling and monitoring systems. These measures are intended to manage the movement of both construction traffic and other road users on constrained sections of the local road network, helping to minimise the likelihood of vehicles meeting in opposing directions, reduce congestion and maintain road safety during the construction period.
SAG-019	Transport and Access	Access to sites 7g-7l and 8a-8b will still be via Shotesham Road in Woodton and Woodton Road in Shotesham. Both these roads are very narrow (less than 2.8m wide) and in poor condition. The journey onward from site 7l to sites 8a-8a is via Woodton Road to Brooke and onwards to Baxter's Lane via Honeypot	The Applicant notes the concern regarding the suitability of Shotesham Road, Woodton Road, Baxter's Lane, Honeypot Lane and Heath Road for construction traffic. As set out in response SAG-018, vehicle tracking assessments have been undertaken for the routes serving Sites 7G-7L, including the site access arrangements, demonstrating that construction vehicles can utilise Shotesham Road and Woodton

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		Lane and Heath Road. Baxter's Lane is also a single track lane.	Road to access these sites. Potential conflicts between construction traffic and other road users would be managed through the measures set out within the Outline CTMP [APP-201]. Vehicle tracking assessments have also been undertaken for the route serving Sites 8A-8B via Baxter's Lane, Honeypot Lane and Heath Road using the proposed construction vehicles. The specific access arrangements for these sites will continue to be refined as the design develops to ensure that only appropriate vehicles are used on the local road network. A more detailed assessment of vehicle types and sizes accessing Sites 8A-8B via Shotesham Road, Woodton Road, Baxter's Lane, Honeypot Lane and Heath Road will be undertaken as part of the detailed Construction Traffic Management Plan, which would be prepared and secured through Requirement 15 of the DCO. The Outline CTMP [APP-201] already recognises the constrained nature of this part of the local road network. Paragraph 7.6 states that HGVs heading to Sites 7G-H, 8A-B and 9 would be restricted to either a 10 m rigid vehicle or a 12 m drawbar vehicle. The Outline CTMP [APP-201] further notes that materials and equipment may need to be transhipped at the temporary construction compound at Sub-Site 10C to facilitate this

ID	Theme	Representation	Applicant's Response
			restriction. Accordingly, vehicle types and sizes would be controlled to ensure that only vehicles suitable for the routes concerned are used.
SAG-020	Transport and Access	The volume of HGV traffic during the construction phase will be a danger to other traffic, cyclists, pedestrians and horse riders. Access onto Baxter's Lane from Heath Road encounters a steep slope and is an unsuitable junction for HGVs. Site 8a is proposed to be accessed by a haul road across site 8b starting on Baxter's Lane, an impracticable proposal due to a very steep gradient down from Site 8b to Market Lane and the necessity for major road works to gain access to Site 8a. The major works includes permanent devastation of the existing quaint bridge/ford crossing over Shotesham Beck.	The Applicant notes the concern regarding the suitability of the Baxter's Lane / Heath Road junction and the gradient along the proposed access route. Vehicle tracking assessments (shown in Appendix C of the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]) have been undertaken at the Baxter's Lane / Heath Road junction, which demonstrate that the proposed construction vehicles can safely negotiate the junction with minimal overrun beyond the carriageway. While the Applicant acknowledges the constrained nature of the route, including changes in gradient, the assessments undertaken indicate that the route is capable of accommodating the proposed construction vehicles. As outlined in response SAG-018, vehicle types and sizes would be controlled through the Outline CTMP [APP-201]. Paragraph 7.6 states that HGVs serving Sites 7G-H, 8A-B and 9 would be restricted to either a 10 m rigid vehicle or a 12 m drawbar vehicle, ensuring that only vehicle types suitable for the local road network would be used.

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			The Applicant also notes the concern regarding the bridge/ford crossing over Shotesham Beck. Construction traffic routeing between Sub-Sites 8A and 8B includes a short section of Market Lane due to physical constraints associated with Shotesham Beck and the presence of hedgerows, which limit the ability to provide a direct connection between the two site parcels. The area between Sites 8A and 8B is also identified as an avoidance area within the Cable Route Construction Statement [APP-216]. Accordingly, trenchless crossing methods are proposed for this section of the cable route, avoiding the need for an open-cut crossing in this location, while a short section of the existing highway network is required to facilitate HGV movements between the two site parcels.
SAG-021	Transport and Access	The Applicant's proposal to use internal haul roads does not alleviate the unsuitability of using single track country lanes to build a large infrastructure scheme.	The Applicant notes the concern regarding the use of rural lanes during the construction period. Please refer to the Applicant's responses to Representations SAG-018, SAG-019 and SAG-020, which explain the construction traffic strategy for these routes, including the use of internal haul roads, vehicle routeing, vehicle size restrictions, swept path assessments and the mitigation measures proposed within the Outline CTMP [APP-201] to manage construction traffic on constrained sections of the local road network.

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SAG-022	Cultural Heritage	CULTURAL HERITAGE - The Scheme of solar panels, and substations has been chosen to be located over a footprint of approximately 12 miles. This disperses industrial infrastructure across multiple parishes, conservation areas and heritage settings, maximising cumulative effect. In terms of cultural heritage alone, the Scheme is not appropriate. Conservation areas in Brooke, Saxlingham Green and Fritton are all within 250m of the solar fields. Conservation areas in Seething, Shotesham, Hempnall and Wacton would all experience material harm to their wider landscape setting where surrounding fields are incorporated into the development.	The Applicant notes that potential impacts to Brooke, Saxlingham Green, Fritton, and Seething Conservation Areas were assessed within ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , which is supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] . These assessments noted that Hempnall, Shotesham, and Wacton Conservation Areas were not taken forwards for further assessment as it was considered that there would be no impact to their character and appearance by the Scheme.
SAG-023	Landscape and Visual	The cumulative consequence is a networked industrialisation of the historic landscape.	The Applicant acknowledges that the Scheme would introduce new built infrastructure into a predominantly rural landscape and has assessed the potential influence of the Scheme within ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] . The assessment considers the effects of the Scheme at the individual Site scale and on the wider landscape character areas in which the Scheme is located. This approach

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			considers the cumulative effects across the landscape. The Applicant notes that the Scheme extends across multiple land parcels, however the LVIA has considered effects associated with this and the Applicant does not agree that the Scheme would result in a "networked industrialisation" of the historic landscape. The Green Infrastructure Strategy [AS-005] provides detail on the proposed landscape and ecological measures, and the Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. As such, the Applicant does not consider that the Scheme would result in a networked industrialisation of the historic landscape.
SAG-024	Landscape and Visual	The true scale and character of the infrastructure proposed is also out of scale with the landscape. The Applicant proposes industrial scale tilting (tracker) solar panels reaching 4.5m in height which would be visible above boundary vegetation, particularly in the winter	The Applicant acknowledges that the Scheme would introduce new built infrastructure into a predominantly rural landscape and that this would result in landscape and visual effects, as assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] .

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		months. Substation on Sites, 4b,7f, and 10c (132Kv) and substations on Sites 1b and 5a (400Kv) up to 15 m high will be highly visible at all times.	The Landscape and Visual Impact Assessment has been undertaken in accordance with the appropriate guidelines and is robust and appropriate for the assessment of the Scheme. The assessment considers the maximum parameters and a worst-case scenario for the Scheme. This includes solar panels at a maximum height of 4.5m; however, it should be acknowledged that this maximum height is only experienced at set intervals during the day and will be at reduced heights for the majority of a 24-hour period. The Applicant recognises that the proposed tracking solar panels, with a maximum height of 4.5m, will extend above existing boundary vegetation in some instances. The proposed substations would represent more noticeable built elements within the Scheme, with the 132kV substations having a maximum height of 7m and the 400kV substations a maximum height of 13m. Whilst the Scheme would result in landscape and visual effects on landscape and visual receptors. The landscape and visual effects arising from these elements has been considered within the Landscape and Visual Impact Assessment and has been undertaken in accordance with the appropriate guidelines. It has informed the iterative design process and is robust and appropriate for the assessment of the

ID	Theme	Representation	Applicant's Response
			Scheme. Any residual effects have been clearly identified and assessed within the LVIA.
SAG-025	Cultural Heritage	The applicant's comments concerning Direct Impacts to Historic Landscape Character (Chapter 10) that the change is temporary and will be reversible and furthermore the field patterns will not change. The applicant also states that the development will better enhance the existing field boundaries through the introduction of hedgerows and tree belts which are presently not there. These statements are far from convincing and in fact, the industrialisation of the historic landscape will cause permanent undesirable change for the next sixty years.	The Applicant considers the proposed landscape measures which include woodland, hedgerows, and trees proposed within the Outline LEMP [APP-199] have been carefully sited with regard to existing characteristic landscape features. The DCO will be time limited to 60 years, after which, other than the National Grid Substation and associated infrastructure, the Scheme will be decommissioned.
SAG-026	Cultural Heritage	In Shotesham there are two listed buildings which will suffer some harm as a result of the proposed solar panel development. Upgate Green Farmhouse and nearby barn (both Grade II) have a significant historic relationship with countryside as Shotesham was historically a gated community, hence Upgate. The provision of solar panels clearly visible on the horizon on Site 8b will harm this concept. Oaks Farmhouse	The Applicant notes that potential impacts to the Grade II Listed Upgate Green Farmhouse (NHLE 1050681), Outhouse Immediately to North of Upgate Green Farmhouse (NHLE 1304804), and Grade II* Listed Oaks Farmhouse (NHLE1170906) have been assessed in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] , which supported by ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – 168] .

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		(Grade II*) on Woodton Road in Shotesham was originally an ecclesiastical building of importance, remotely situated in quiet surroundings. The proposed industrialisation of hundreds of acres of fields (Sites 7l and 7k) directly west of this heritage asset will harm this concept.	Regarding Upgate Farm, as part of development of the Scheme, Solar PV Panels were removed from northernmost field of Sub-Site 8B. The existing substantial hedgerows along the southern part of this field and FP22 will be enhanced under the landscape proposals of the Scheme to offer further screening. The assessments have acknowledged that the wider agricultural setting of Upgate Farmhouse highlights its rural nature and intentional design; however, with the proposed mitigation, the assessment has concluded that overall significance of these designated heritage assets will not be harmed by the Scheme. Regarding Oaks Farmhouse, the assessments do acknowledge that the agricultural hinterland does form part of the wider historic setting of the heritage asset, and that there is a tenurial link between this heritage asset and much of the surrounding land, including Sub-Site 7L, which dates to the early-mid 19th century; however, it is not considered that historic ownership alone makes any specific contribution to its significance has a listed farmhouse, and it is further noted that these lands are no longer form part of the holdings of Oaks Farmhouse.

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			Oaks Farmhouse is currently set within a small plot which is enclosed by the property's gardens, which are bounded by mature hedgerows and trees to afford the complex a degree of privacy as a residence. A small field separates Oaks Farmhouse and Sub-Site 7L, with the eastern boundary of Sub-Site 7L formed of mature vegetation, though there are some gaps in this hedgerow which provided intervisibility between the heritage asset and the south-eastern corner of Sub-Site 7L. As part of the development of the Scheme, a setback has been established along the eastern boundary of Sub-Site 7L, with this setback resulting in the removal of much of this intervisibility. Visual screening, in the form of infill planting of the existing hedgerow, as well as the introduction of new native broadleaf woodland at the eastern boundary of Sub-Site 7L, will be carried out to further reduce any visibility from this designated heritage asset. While it is acknowledged that the introduction of Solar PV Panels within Sub-Site 7L will constitute a minor change to the wider setting of Oaks Farmhouse, the wider vistas are not a key part in demonstrating the setting of this heritage asset, nor is the significance of the property highly influenced by this setting. The assessment concluded that the overall significance of this

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			designated heritage asset will not be harmed by the Scheme.
SAG-027	Glint and Glare	GLINT AND GLARE -The Applicant's proposal to use industrial scale tilting (tracker)solar panels reaching 4.5m high on Sites 8a and 8b will cause glint and glare for some receptors. Site 8a solar panels will be fully visible across the valley from road users on Baxter's Lane and from the west elevation of Golden Eye Barn.	The Applicant has assessed glint and glare impacts upon road safety, residential amenity and aviation activity considering panels implementing a Single-Axis Tracker in ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025 – AS-029] . Whilst the Scheme may be visible for receptors at certain locations, the Applicant has ensured that views of reflecting panels that cause glint and glare will not be visible or significantly impact the safety of road users. Baxter's Lane is considered a local road, where any solar reflections from the Scheme that are experienced by a road user would be considered low impact in the worst case in accordance with the guidance presented in Appendix D of ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025 – AS-029] .
SAG-028	Glint and Glare	The north elevation of Golden Eye Barn is also impacted by solar panels on Site 8b. Baxter's Lane users travelling north to south will be impacted when the solar panels are tilting eastwards and similarly for Golden Eye Barn.	The Applicant has assessed glint and glare impacts upon road safety, residential amenity and aviation activity considering panels implementing a Single-Axis Tracker in ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025 – AS-029] . Whilst the Scheme may be visible for receptors at certain locations, the Applicant has ensured that views of reflecting panels that cause

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			glint and glare will not be visible or significantly impact the safety of road users of Baxter's Lane.
SAG-029	Glint and Glare	Solar panels tilting west on site 8a and or 8b will impact Lathgreen Farm and Dawsons Farm on Wash Lane, Market Lane Farm on Market Lane, and users of Boudicca's Way.	The Applicant has assessed glint and glare impacts upon road safety, residential amenity and aviation activity considering panels implementing a Single-Axis Tracker in ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025 – AS-029] . Whilst the Scheme may be visible for receptors at certain locations, the Applicant has ensured that views of reflecting panels that cause glint and glare will not be visible or significantly impact the safety of road users of Boudicca's Way.
SAG-030	Glint and Glare	Users of footpaths 19 and 22 will also be impacted by glint and glare.	The Applicant considers that glint and glare impacts due to solar reflections from solar developments upon pedestrians/observers along public rights of way are not considered significant as identified in ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025 – AS-029]. The reasoning is due to the sensitivity of the receptors (in terms of amenity and safety) being concluded to be of low significance because: Effects would typically coincide with direct sunlight. The Sun is a far more significant source of light than reflecting panels; - The glare intensity is comparable to surfaces occurring in the existing environment such still water, and

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			significantly less than reflections from glass and steel, which is frequently a feature of the outdoor environment surrounding public rights of way. Therefore, the reflections are likely to be comparable to those from common outdoor sources whilst navigating the natural and built environment on a regular basis; - The typical density of pedestrians on public rights of way is low in a rural environment (such as the location of the proposed development); - Any resultant effect is much less serious and has far lesser consequences than, for example, solar reflections experienced towards a road network whereby the resultant impacts of a solar reflection can be much more serious to safety; - Glint and glare effects towards receptors on a PRow are transient, and time and location sensitive whereby a pedestrian could move beyond the solar reflection zone with ease with little impact upon safety or amenity; - There is no safety hazard associated with reflections towards an observer on a footpath

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SAG-031	Noise and Vibration	NOISE - The sound power level of solar panel inverters is 91 dBA (Chapter 12 Table 12-21) With the inverters located centrally on Sites 8a and 8b, the sound pressure level will exceed the existing background noise at Kings Farm and Ley Farm and their four adjoining barn conversions, and at Market lane Farm, especially if the frequency is low. The existing background noise on Baxter's Lane and Market Lane is very low, typically not exceeding 20 dBA day and night. Footpath users will also hear the inverters in continual use and the solar tracking motors intermittently. The sound power level of each solar tracking motor is 50 dBA . This would increase depending on the number of solar panels motors operating at the same time. It appears the existing tranquillity of the area will be adversely affected by the proposed infrastructure.	The sound power level of solar panel inverters is 91 dBA L_w. This describes the amount of sound energy being emitted by the equipment. This is not the level received at receptors. Background sound levels have been determined from the results of the environmental sound survey at each receptor, and the $L_{A90,15minutes}$ parameter is used to represent this. The rating levels from the Scheme have been calculated at each receptor, and the $L_{Ar,Tr}$ parameter is used to represent this. The assessment is based on the National Grid Substation, Project Substations and BESS operating 24 hours a day. The solar inverters are assumed to not operate at night (between 23:00 and 04:00 hours). Kings Farm and Lay Farm are represented by NSR59 within the operational noise assessment presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Background Sound Levels at NSR59 Based on the results of the environmental sound survey, the typical background sound levels at this location have been determined to be: 28 dB $L_{A90,15minutes}$ during the day;

ID	Theme	Representation	Applicant's Response
			22 dB $L_{A90,15\text{minutes}}$ during the night; and 19 dB $L_{A90,15\text{minutes}}$ during the early morning. Rating Levels at NSR59 With mitigation, the rating level from proposed equipment at NSR59 is not expected to exceed: 22 dB $L_{Ar,Tr}$ during the day or early morning periods; and 2 dB $L_{Ar,Tr}$ during the night. Assessment Outcome at NSR59 BS 4142 requires the rating level to be compared with the background sound level to provide an indication of the likely impact. The rating levels are expected to in-line with or below the background sound level at NSR59. The effect is therefore considered to be negligible, and not significant Market Lane Farm is represented by NSR62 within the operational noise assessment presented in ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]. Background Sound Levels at NSR62

ID	Theme	Representation	Applicant's Response
			Based on the results of the environmental sound survey, the typical background sound levels at this location have been determined to be: 28 dB $L_{A90,15\text{minutes}}$ during the day; 18 dB $L_{A90,15\text{minutes}}$ during the night; and 21 dB $L_{A90,15\text{minutes}}$ during the early morning. Rating Levels at NSR62 With mitigation, the rating level from the proposed equipment at NSR62 is not expected to exceed: 20 dB $L_{Ar,Tr}$ during the day or early morning periods; and <0 dB $L_{Ar,Tr}$ during the night. Assessment Outcome at NSR62 BS 4142 requires the rating level to be compared with the background sound level to provide an indication of the likely impact. The rating levels are expected to be in-line with or below the background sound level at NSR62. The effect is therefore considered to be long-term negligible, and not significant.
SAG-032	Human Health	IMPACT ON COMMUNITIES - Village communities will suffer from the effects of nearby solar development. East Pye Solar Farm encompasses 12 villages	The Applicant acknowledges concerns regarding potential impacts on village communities, including amenity, views, recreation, traffic, noise, flood risk, wildlife and mental wellbeing. These matters have

ID	Theme	Representation	Applicant's Response
		over a 12 mile distance. This will detrimentally affect a large proportion of South Norfolk. Village communities will gain no benefit. Village amenities will be adversely affected. Mental health is a known issue with solar development caused by concerns over destruction of the countryside, loss of countryside views, fall in house prices/reduced saleability, negative impact on leisure activities, unknown flood risk, wildlife destruction, noise pollution, traffic concerns, community disagreements due to differing opinions and uncertainty due to unknown health risks .	been assessed within the Human Health Summary Statement in ES Volume 1: Chapter 18 – Other Environmental Matters [APP-054] and the Equality Impact Assessment [APP-214]. The assessments recognise that construction activities and landscape change may result in temporary effects on some communities, including access to PRoW and recreational routes, perceptions of safety, amenity and wellbeing. Particular consideration has been given to potentially more sensitive groups, including children, older people, disabled people and those with long-term health conditions. A range of mitigation and enhancement measures are proposed, including traffic management, noise and dust controls, landscape planting, PRoW management, three new permissive paths, and improvements to access and connectivity. While significant landscape and visual effects are identified in some locations, these are expected to reduce over time as planting establishes. Construction traffic, PRoW disruption, noise, air quality, flood risk, EMF and BESS safety risks are assessed as not significant following mitigation. The Scheme is also expected to provide benefits, including renewable energy generation, employment and skills opportunities, and

ID	Theme	Representation	Applicant's Response
			enhanced access to the countryside. Overall, the Human Health Summary Statement and Equality Impact Assessment conclude that no likely significant adverse residual effects on human health or community wellbeing are anticipated The Applicant's Book of Reference [APP-022] includes persons who may be eligible to claim compensation if the DCO is granted and the Scheme developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Scheme, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views. This is consistent with established planning law. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made. In any event, whilst the Applicant acknowledges that impacts to property prices is a concern for neighbouring residents and businesses, published research and evidence to date does not indicate that solar farms have a significant adverse long-term effect to nearby property values. This is because there is no empirical evidence that

ID	Theme	Representation	Applicant's Response
			industrial scale solar farms cause significant long-term adverse effects on property prices. Whilst it is acknowledged that there have been no known studies of completed >50MW solar Schemes in the UK, studies from the USA and Netherlands do not show any definitive evidence of adverse effects between solar farms and property prices, and conclude that other external factors (such as wider property markets, macroeconomic trends, changes to local services such as schools and healthcare providers) are likely to be more important factors in changes to property prices. Furthermore, there is a difference between short-term troughs in property saleability during peaks in construction activity versus the long-term property value once the Scheme is operating and mitigation set in place.
SAG-033	Scheme Description	PROPOSED SUBSTATIONS - Five substations on agricultural fields and the National Grid substation in Great Mouton will significantly add to blight of solar panel industrialisation across South Norfolk. In Great Moulton a 400Kv substation is proposed in the same field as the National Grid substation. The installations are proposed within 250m of residential properties in Great Moulton. This proposal would be clearly overbearing	The Applicant notes the concern regarding impacts on Great Moulton. Consideration was given to a number of alternative locations for the new National Grid Substation, and these are summarised in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] . The location within Sub-Site 1B beneath the Bramford to Norwich 400kV line was considered to be favourable in terms of flood constraints, and conflict with the PRoW, and given the overlap of the alternative location with the solar application (ref. 2024/3817). As part of the design

ID	Theme	Representation	Applicant's Response
		for the village and by any standards should not proceed. It is known that this proposed location of the National Grid substation was originally planned out of the village in a less overbearing location.	evolution, the National Grid Substation was reoriented north – south to enable greater opportunities of screening from existing vegetation to the north to reduce the visibility from Great Moulton and provide greater offset from Narrowgate Way PRow. The Applicant has assessed the likely significant effects of the Scheme within the ES [APP-042 to APP-056] and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. Of particular relevance to the assessment of effects on local communities and mitigation measures are set out in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], Chapter 11 – Transport and Access [APP-047], Chapter 12 – Noise and Vibration [APP-048], Chapter 13 – Air Quality [APP-049], Chapter 14 - Socio-Economics [APP-050], and Chapter 18 - Other Environmental Matters [APP-054]. The proposed management and mitigation measures are secured through various outline management plans [APP-196 to APP-205].
SAG-034	General remarks	The proposed Scheme is not appropriate for the historic agricultural landscape covering such a large area of South Norfolk. There has been inadequate consideration for this proposal influencing site selection for	With regard to paragraph 5.10.26 of NPS EN-1, the Applicant notes that this paragraph recognises that reducing the scale of a project can help to mitigate landscape and visual effects, but that reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result

ID	Theme	Representation	Applicant's Response
		the whole Scheme but particularly for Site 8. NSP EN1 5.10.26 concerning mitigation states there maybe exceptional circumstances where mitigation could have a very significant benefit (see reasons above) and warrant a small reduction in function The reduction in function (electricity generation output) for Site 8 would be minimal. The adverse impacts would be long term and not capable of being reduced in time. This is due to the topography, high landscape value and the environmental value of Site 8.	in a significant operational constraint and reduction in function. The paragraph provides that there may be exceptional circumstances where mitigation could have a very significant benefit and warrant a small reduction in function, in which case the Secretary of State may decide that the benefits of the mitigation outweigh the marginal loss of function. The Applicant draws attention to the Statement of Need [APP-206], which provides an explanation of why the Scheme is urgently needed at the proposed scale, and to the Planning Statement [APP-209], which sets out that the Scheme has been designed to maximise the energy generation benefit from the available land and the grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects as far as practicable. The mitigation hierarchy for landscape and visual amenity has been applied throughout the design of the Scheme and the landscape and visual impacts have been minimised as far as practicable. The Green Infrastructure Strategy [AS-005] has sought to balance the requirements for visual screening against the defining visual qualities of the landscape.

ID	Theme	Representation	Applicant's Response
			The Applicant considers that the residual adverse landscape and visual effects on Site 8 have been minimised as far as practicable through the design evolution and embedded mitigation. It is considered by the Applicant, for the reasons set out in the Planning Statement [APP-209], that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case, including its status as Critical National Priority Infrastructure and its contribution to delivery of a significant level of low carbon energy generation, ecological and landscape enhancements, biodiversity net gain, and provision of permissive paths and community accessible space.
SAG-035	Landscape and Visual	Attachment: East Pye Solar DCO Examination-Written Representation. Landscape and Visual Matters – Site 8, Shotesham	The Applicant has responded to the Executive Summary of the report in SPC-171 to SPC-172 of the Applicant's Response to Relevant Representations. The Applicant will make additional submissions in response to Shotesham Parish Council's Relevant Representation, specifically in respect of their supporting document 'East Pye Solar – Site 8, Shotesham - Landscape & Visual Matters produced by Classic Landscape Architecture' to address matters, including in relation to Site Selection, at Deadline 1.

6.6 Shotesham Common Trustees

Table 2.16 Applicant's Response to Shotesham Common Trustees [\[RR-1769\]](#)

ID	Theme	Representation	Applicant's Response
SCT-001	General remarks	Interested Party: Shotesham Common Trustees Interest: Management of Shotesham Common SSSI (downstream receptor). Introduction This Written Representation is submitted on behalf of the Trustees of Shotesham Common, a 47-acre Site of Special Scientific Interest (SSSI) located downstream of Sites 8a and 8b within the River Tas catchment. The Trustees are responsible for the long-term management of the Common, including grazing, habitat maintenance, and conservation, working in partnership with Natural England.	The Applicant welcomes the engagement of the Trustees of Shotesham Common in the Examination process and notes their role in the long-term management of Shotesham Common SSSI in partnership with Natural England. The Applicant draws attention to the fact that Shotesham Common SSSI has been identified and considered within the assessment of the Scheme within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018].
SCT-002	Ecology and Biodiversity Water Environment	Summary of Position The Trustees object to the inclusion of Sites 8a and 8b within the Proposed Development. The Proposed Development gives rise to a risk of adverse effects on the hydrology, water	The Applicant notes this comment and the concerns in relation to solar panel installation in Sub-Sites 8a and 8b. The existing use for the fields is agricultural where the soil is stirred up during crop harvesting and the

ID	Theme	Representation	Applicant's Response
		quality, and ecological condition of Shotesham Common SSSI, and insufficient evidence has been provided to demonstrate that such effects can be avoided.	land is likely let bare during the winter months when it is wetter. During heavy rainfall, this would lead to sediment/soil mobilisation which may enter ditches/the Shotesham Beck and reduce watercourse capacity and result in blockage of any culverts present. The proposed use for Sub-Sites 8A and 8B will be solar panels which are located outside of areas of Flood Zones 2 and 3, and outside of areas of higher surface water flood risk as far as reasonably practicable, as set out in Section 8 of ES Volume 3, Appendix 9.1- Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018] and secured within the Design Principles, Parameters and Commitments [APP-213]. The proposed use across the Order Limits is predominantly solar panels. The ground across the panel fields will consist of a grass and/or wildflower meadow maintained at a suitable height as secured in Outline LEMP [APP-996]. The provision of this grass cover all year round will significantly improve soil stabilisation and as studies have shown that grass cover has a higher roughness coefficient than bare soil or agricultural use and therefore slows down the rate of runoff flowing down the fields. The solar panel elements

ID	Theme	Representation	Applicant's Response
			of the Scheme will therefore not increase surface water flood risk to downstream water receptors. The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on Shotesham Common SSSI, and concludes that following from the implementation of embedded mitigation measures, no significant effects are anticipated during the construction, operational and decommissioning phases of the Scheme.
SCT-003	Water Environment	Hydrological Connectivity and Flood Risk Sites 8a and 8b are hydrologically connected to the River Tas system, with clear pathways for runoff, sediment, and pollutants. Solar development would introduce soil compaction, reduced infiltration, and concentrated runoff, which are likely to increase downstream flood risk and alter flow regimes affecting the Common.	The Applicant refers to its response to SCT-002.
SCT-004	Water Environment	Water Quality The Proposed Development introduces risks of sediment mobilisation and pollution from construction and operation. Chalk stream systems are	Embedded mitigation measures for pollution management are set out for each phase of the Scheme within and secured by the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198].

ID	Theme	Representation	Applicant's Response
		highly sensitive, and even minor deterioration in water quality may result in damage to habitats and species dependent on clean water.	
SCT-005	Ecology and Biodiversity	Ecological Effects Shotesham Common depends on stable hydrology and high water quality. Changes in these conditions may result in habitat degradation and adverse effects on ecological integrity.	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including designated sites for nature conservation, ancient woodlands, protected and notable habitats and species. The ES identifies a potential impact pathway to Shotesham Common SSSI through hydrological connectivity to the Order Limits, with the potential for impacts through the mobilisation of contaminants to surface water and groundwater. Embedded mitigation measures to avoid or minimise potential impacts are set out within the ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] and the Outline CEMP [APP-196]. In the context of these measures, the ES concludes potential impacts to Shotesham Common SSSI are Not Significant.
SCT-006	EIA Methodology	Adequacy of Environmental Information The Environmental Statement does not include sufficient site-specific	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features downstream including designated sites for nature

ID	Theme	Representation	Applicant's Response
	Ecology and Biodiversity Hydrology	assessment of hydrology or downstream receptors, including the SSSI. Key matters are deferred to post-consent stages and reliance is placed on outline mitigation, resulting in uncertainty.	conservation, ancient woodlands, protected and notable habitats and species. As set out in Section 6 of ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018], the hydrological connectivity of the Scheme to sensitive ecological sites (e.g. SSSIs) was based on the presence of watercourses running through/downstream of the Order Limits/adjacent to the designated sites, LiDAR topography (i.e. whether designated sites are located topographically downstream of the Order Limits) and the direction of overland flow routes. Embedded mitigation measures proposed to avoid or minimise potential impacts (flood risk and pollution management) are set out within the ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] and secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. With the incorporation of these mitigation measures, the assessment within ES Volume 1, Chapter 9 – Water Environment [APP-045] concludes that the impacts to designated sites which are considered to be hydrologically linked to the Order Limits are 'Not Significant', with the

ID	Theme	Representation	Applicant's Response
			exception of the cessation of agricultural use/fertiliser which is 'Significant Major Beneficial'.
SCT-007	EIA Methodology Ecology and Biodiversity	Application of the Precautionary Principle Where there is uncertainty regarding impacts on a designated site, a precautionary approach must be applied. It has not been demonstrated that the Proposed Development would avoid adverse effects on the integrity of the SSSI.	The Applicant refers to its response to SCT-005.
SCT-008	EIA Methodology Ecology and Biodiversity	Conclusion There is a clear pathway for impact and a credible risk of harm to Shotesham Common SSSI. In the absence of sufficient evidence to rule out adverse effects, the inclusion of Sites 8a and 8b is not justified. Requested Outcome The Trustees request that the Examining Authority recommends that Development Consent is not granted for Sites 8a and 8b, or that these sites are removed from the Order Limits.	Shotesham Common SSSI has been identified within the ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [APP-162] as having hydrological connectivity to the Order Limits, and without sufficient protective measures in place has the potential to be impacted by the Scheme through the mobilisation of contaminants to surface water and groundwater receptors. However, with the adoption of embedded hydrological mitigation measures detailed within the ES Volume 3, Appendix 9.1- Flood Risk Assessment & Outline Surface Water Drainage Strategy [APP-162] and the Outline CEMP [APP-196] the hydrological and ecological impacts of the Scheme on Shotesham Common SSSI have been assessed as Not Significant, for further information see ES Volume 1, Chapter 9 - Water

ID	Theme	Representation	Applicant's Response
			Environment [APP-045] and ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].

6.7 Shotesham Conservation Group

Table 2.17 Applicant's Response to Shotesham Conservation Group [[RR-1770](#)]

ID	Theme	Representation	Applicant's Response
SCG-001	General remarks	This submission is made by the leadership team of the Shotesham Conservation Group. We believe it is important to raise concerns about the potential impact of the East Pye Solar proposal on the wildlife, habitats and ecological character of the Tas Valley landscape.	The Applicant notes this comment and has provided responses to specific comments made by the Shotesham Conservation Group below.
SCG-002	Need for the Scheme	We recognise the importance of renewable energy in addressing climate change and support the principle of transitioning away from fossil fuels. However, tackling one environmental challenge should not come at the expense of another. The protection and restoration of wildlife habitats must remain a fundamental consideration in any major infrastructure proposal.	The Applicant welcomes the support offered in this representation for the transition away from fossil fuels. The Applicant is bringing forward these proposals to support the government's aim to deliver a clean power system to prepare the UK for the rapid growth in power demand expected over the 2030s and 2040s through the substitution of fossil fuels from transport, home and industrial demand, as the Statement of Need [APP-206] describes. Whilst there is no legislative requirement for the Scheme to provide quantifiable BNG, the Applicant has committed to the protection and restoration of habitats with a minimum of 10% BNG under

ID	Theme	Representation	Applicant's Response
			Requirement 9 and has provided outline commitments to post-developing monitoring within the Outline LEMP [APP-199]. The impacts of these habitat protection and enhancement measures are considered within the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].
SCG-003	Ecology and Biodiversity Cumulative Impact	The landscape surrounding Shotesham forms part of a connected network of farmland, hedgerows, watercourses, woodland fragments and species-rich margins that support a wide range of wildlife. This mosaic of habitats has developed over generations and provides important corridors for movement between different ecological areas across South Norfolk. Our concern is not simply the loss of individual fields but the cumulative impact of introducing a large-scale industrial development into an interconnected living landscape. Security fencing, access tracks, battery storage facilities, substations and associated infrastructure have the potential to fragment habitats and alter established wildlife movement patterns.	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] presents an assessment of the likely effects of the Scheme on ecological receptors, including designated sites, habitats, protected and notable species, and ecological connectivity. The assessment has been informed by extensive baseline surveys, as set out in ES Volume 3, Appendix 8.1 – Ecological Desk Study and Extended Habitat Survey [APP-158] and supporting protected species survey appendices. Cumulative effects on ecology and biodiversity have been assessed in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The design of the Scheme has followed the mitigation hierarchy, seeking first to avoid impacts on ecological features through the layout and siting of infrastructure, as set out in ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041] and the Design

ID	Theme	Representation	Applicant's Response
		Species do not recognise development boundaries, and even where habitat remains physically present, ecological connectivity can be significantly reduced.	Approach Document [APP-212]. This has included the application of design buffers from hedgerows, trees, woodland, ponds, watercourses and other ecological features, as secured through the Design Principles, Parameters and Commitments [APP-213]. The Scheme retains the majority of existing hedgerows, trees and woodland within the Order Limits, with permanent hedgerow removal limited to a maximum of 10m at individual access points, as set out in the Outline Landscape and Ecology Management Plan (Outline LEMP) [APP-198]. Ecological mitigation and enhancement measures are set out in the Green Infrastructure Strategy within the Outline LEMP [APP-198] and include the creation of new broadleaf woodland, linear tree belts, native hedgerows and hedgerows with trees, scrub, arable field margins, skylark mitigation areas, restoration of ghost ponds, and the establishment of flower-rich pollinator, tussocky and neutral grassland. These measures are designed to retain and enhance existing vegetation, strengthen habitat corridors through the farmed landscape, allow the movement of wildlife, and improve ecological connectivity at a landscape scale, in accordance with local conservation priorities.

ID	Theme	Representation	Applicant's Response
			The Scheme is also anticipated to deliver measurable Biodiversity Net Gain, as set out in the Biodiversity Net Gain Assessment [APP-210]. The implementation of ecological mitigation and enhancement measures is secured through the detailed Landscape and Ecology Management Plan, to be prepared substantially in accordance with the Outline LEMP [APP-198] and controlled by the relevant Requirement in Schedule 2 of the Draft DCO [AS-032].
SCG-004	Ecology and Biodiversity	The Tas Valley supports populations of farmland birds that have experienced significant declines across the United Kingdom. Species regularly recorded within the wider South Norfolk landscape, including skylark, yellowhammer, linnet and lapwing, depend upon open agricultural habitats for nesting and feeding. Construction activity, operational disturbance and changes in land management may place additional pressure on these already vulnerable species.	The Applicant draws attention to ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], which presents an assessment of the likely effects of the Scheme on ecological receptors, including breeding and wintering birds, skylark, yellowhammer, linnet and lapwing. The assessment has been informed by extensive baseline surveys, including breeding bird surveys as set out in the supporting technical appendices to ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Specific measures for farmland birds are set out in the Outline LEMP [APP-198], which secures the provision of dedicated skylark mitigation areas within retained agricultural land, together with the creation and management of arable field margins as priority habitat. These measures are designed to provide alternative nesting and foraging habitat

ID	Theme	Representation	Applicant's Response
			for ground-nesting farmland birds displaced by the Solar PV Arrays. In addition, research by scientists from the RSPB and University of Cambridge '<i>Solar farm management influences breeding bird responses in an arable-dominated landscape</i>' (Copping J P et al. 2025) as part of the Centre for Landscape Regeneration found that (hectare for hectare) solar farms in agriculturally dominated East Anglia contained a greater number of bird species and overall number of birds than surrounding arable farmland. With (appropriately managed) solar farms having the greatest variety of species and nearly three times as many birds compared to nearby arable farmland. Thereby, suggesting that collision risk or displacement is not a major factor in limiting bird species abundance and numbers.
SCG-005	Ecology and Biodiversity	The extensive network of mature hedgerows throughout the area is of particular ecological importance. These hedgerows provide nesting opportunities, shelter and movement corridors for birds, mammals, reptiles, insects and bats. Their value lies not only in their individual presence but in the connectivity they provide across the wider landscape. Any disruption to these	The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] , include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of wildlife.

ID	Theme	Representation	Applicant's Response
		networks risks weakening ecological resilience across the area.	A buffer zone of 10m will be delivered between hedgerows and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199] . When considering the scale of the Scheme, this will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for wildlife, away from the solar PV infrastructure.
SCG-006	Ecology and Biodiversity	We are also concerned about the potential impact on bat populations. The combination of historic buildings, mature trees, hedgerows and watercourses around Shotesham creates a landscape that supports a range of bat species. Changes to habitat structure, increased activity and associated infrastructure could affect important commuting and foraging routes.	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including bats. The Ecology and Biodiversity chapter has been underpinned by ground level tree assessments for roosting bats, and bat activity surveys, as detailed within ES Volume 3, Appendices 8.5 and 8.6 [APP-155 and APP-156] respectively.
SCG-007	Ecology and Biodiversity	More broadly, Norfolk is experiencing continuing biodiversity decline. Conservation organisations, landowners	Whilst there is no legislative requirement for the Scheme to provide quantifiable Biodiversity Net Gain (BNG), the Applicant has sought to embed

ID	Theme	Representation	Applicant's Response
		and local communities are investing significant effort into habitat restoration, nature recovery and the strengthening of ecological networks. We believe that developments of this scale should demonstrate beyond reasonable doubt that they will contribute positively to those objectives and not simply offset unavoidable harm elsewhere.	BNG into the Scheme design from the early optioneering stages through to submission. A detailed approach is provided within the Biodiversity Net Gain Report [APP-218] which discusses the Schemes adherence to the biodiversity gain hierarchy, and habitat baseline values and post-construction values are calculated and provided within the Biodiversity Net Gain Statutory Metric [APP-219]. Further information regarding the creation of habitats within the Scheme is provided within the Outline LEMP [APP-199], The Applicant has committed to a minimum of 10% Biodiversity Net Gain for the Scheme, 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].
SCG-008	Ecology and Biodiversity	Finally, we believe a precautionary approach should be adopted. Ecological surveys inevitably provide only a snapshot in time and cannot fully reflect the complexity of ecological relationships that have developed across this landscape over many decades. Where uncertainty remains regarding impacts on wildlife, habitat	The assessment of the Scheme on important ecological features, as set out in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] is based on a combination of contextual data obtained during the desk study, baseline ecological survey data obtained during the baseline ecological surveys and the application of professional judgement. This includes the application of precaution, where applicable, as

ID	Theme	Representation	Applicant's Response
		connectivity and biodiversity, decision-makers should err on the side of protection.	detailed in the ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] and ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] which sets out the protection of species afforded legislative protection, during the Construction Phase of the Scheme, including precautionary pre-commencement commitments.
SCG-009	General remarks	For these reasons, the leadership team of the Shotesham Conservation Group respectfully requests that consent for the East Pye Solar project be refused.	As set out in the Planning Statement [APP-209] , having had regard to all important and relevant matters, the Applicant has concluded that there are no adverse impacts of sufficient weight, either individually or collectively, that would mean the DCO should not be made. The adverse impacts are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1. The Policy Compliance Document [APP-210] further demonstrates the Scheme's compliance with the relevant NPSs and the NPPF.

6.8 South Norfolk Tree Warden Network

Table 2.18 Applicant's response to South Norfolk Tree Warden Network [[RR-1796](#)]

ID	Theme	Representation	Applicant's Response
SNTWN-001	Ecology and Biodiversity	We wish to be informed about hazards to trees arising from this programme please We are a volunteer-led group made up of the South Norfolk Tree Wardens and other interested people with the main objectives of: • Championing trees and hedges in South Norfolk • Tree owner and county and district council liaison • Setting up tree nurseries • Planting and caring for trees and hedges and managing local woodlands • Gathering information about trees, woodland and hedges • Identifying and recording veteran and ancient trees, and trees that need protection	The trees within the Order Limit, including ancient and veteran trees, are surveyed and recorded in ES Volume 3: Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP150]. Hedgerows affected by the Scheme are identified in the Outline LEMP [APP-199] Appendix A. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 Indicative Masterplan [APP-059] have been applied to retain, protect and enhance ecological assets. They include for the retention and enhancement of field boundary features (including hedgerows/tree lines/woodlands). The Outline CEMP [APP-196], the Outline OEMP [APP-197] and the Outline DEMP [APP-198] set out measures to protect trees and hedgerows during construction, operation and decommissioning respectively. The Applicant welcomes South Norfolk Tree Warden Network's participation in the Examination and is open to further engagement on this matter.

ID	Theme	Representation	Applicant's Response
		• Furthering the Tree Council aims	
SNTWN-002	Grid Connection	South Norfolk Tree Warden Network objects to East Pye Solar. The Applicant admits in their application that there is no need for East Pye Solar and particularly the BESS (gate 1 queue) in this location to meet regional Clean Power 2030 Action Plan targets (2031–35) for East Anglia T7 region. The Applicant relies on an argument of 'optionality' and 'attrition' for a general national need. The specific harms posed by this project, at this scale, in this location are unmitigable. They cannot be outweighed by a vague argument of 'optionality' for a general national need.	<u>Need for Solar</u> The Statement of Need [APP-206] sets out the government's policy position that there is a critical national priority for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms such as the Scheme. It also explains that the starting point for all assessments of applications for energy infrastructure types which are covered by the NPSs is that substantial weight is given to the need for such schemes (NPS EN-1, Paragraph. 4.2.19). Section 7.6 and Section 7.7 of the Statement of Need [APP-206] explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes which have been prioritised to satisfy the current relevant regional capacity range to 2035 (i.e. without the Scheme, the national and regional capacity ranges would not be met). However, the Applicant notes that the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6)

ID	Theme	Representation	Applicant's Response
			This is because, as Section 4.3 of the Statement of Need [APP-206] explains, current levels of national electricity demand are expected to double to electrify transport and other non-electricity sector demand. Regional electricity demand is likely to grow at a similar rate to national electricity demand, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030. Section 7.3 of the Statement of Need [APP-206] sets out the challenge to deliver net zero regionally and underpins the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand. Within this context of a clear national and regional need for the Scheme, it is clear that seeking to maximise the benefits arising from the Scheme is aligned with the government's energy policy. The Applicant seeks to maximise the decarbonisation, energy security and affordability benefits arising from the Scheme from available and suitable land and through its contracted grid connection and is therefore going towards meeting the need established in NPS EN-1. <u>Need for BESS</u>

ID	Theme	Representation	Applicant's Response
			A BESS is proposed as associated development to the main Solar PV Sites and will support their operation. The benefits arising from the BESS are set out in Sections 5.11, 6.9, and 6.10 of the Statement of Need [APP-206] Paragraph 6.9.3 of the Statement of Need [APP-206] explains that <i>"Solar schemes may be developed as standalone schemes or may be co-located with storage or other generation technologies. Both standalone and co-located schemes will play essential roles in contributing to the three pillars of energy policy: decarbonisation, security of supply, and affordability."</i> Further, the Energy NPSs strongly support low-carbon generation schemes. NPS EN-1 also provides strong support for flexible assets, such as BESS (for example, paragraphs 3.3.5, 3.3.6, 3.3.25) and NPS EN-3 paragraph 2.10.24 provides that <i>"Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolyzers) to maximise the efficiency of land use"</i>. Upon receiving consent for the Scheme (if granted) the Applicant would re-submit the BESS component of the Scheme to a future re-

ID	Theme	Representation	Applicant's Response
			prioritisation round to seek a Gate 2 connection offer (firm connection date) for the BESS. Section 7.5 of the Statement of Need [APP-206] explains that the Scheme's proposed point of connection is located well away from areas of the network which may be constrained during high levels of wind generation and concludes that the connection of a large-scale solar scheme in the proposed location is not likely to cause any significant network constraints under either the economy or security criteria for network development and operation. Section 5.3 of the Statement of Need [APP-206] provides evidence on attrition in the UK's energy scheme development pipeline. This demonstrates that attrition is not an 'abstract and indiscriminate' concept but is instead one which the Government has recognised and addresses through its national policy position. For example: Paragraph 3.3.10 of NPS EN-1 states that <i>"it is prudent to plan on a conservative basis to ensure that there is sufficient supply of electricity to meet demand across a wide range of future scenarios,"</i> and Page 31 of the Clean Power 2030 Action Plan states that <i>"there is no singular path to achieving clean power, but instead ... there are a range of</i>

ID	Theme	Representation	Applicant's Response
			<i>scenarios that could get us there. Over time, there will be more clarity on which scenarios are most likely, depending on the outcomes of negotiations and other contract-award processes, and through monitoring delivery of assets with long lead-times, such as the transmission network, offshore wind, and nuclear. This new information will allow the pathway to 2030 to be refined over time, enabled where needed through prioritising connections offers, helping to determine the precise capacity mix required to deliver Clean Power 2030.</i> <i>Therefore, whilst the 'Clean Power Capacity Range' provides a foundation to guide rapid policy development and focus delivery, the scenarios developed now cannot be exhaustive or definitive, and it is only right that some optionality is retained. In the first instance, this means:</i> <i>... Government sets ranges for deployment of each technology by 2030 and will maintain some optionality until more clarity on which scenario is most likely is available</i> The planning balance considering the positive, neutral and negative impacts are set out in the Planning Statement [APP-209]. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy.

ID	Theme	Representation	Applicant's Response
SNTWN-003	Scheme Description Mitigation measures	The Scheme is not a minor rural development. The ES confirms that it comprises solar PV generation, BESS, up to three 132 kV Project Substations, up to three 400 kV Project Substations, grid connection infrastructure and a new National Grid Substation, with construction, operation, maintenance and decommissioning phases assessed through the DCO application. For a scheme of this scale, affecting a landscape structured by mature hedgerows, field trees, woodlands, veteran features, public rights of way and bat commuting corridors, the arboricultural effects must be fully understood before consent is even considered, not resolved after consent.	The trees within the Order Limit, including ancient and veteran trees, are surveyed and recorded in ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP150]. The arboricultural impact appraisal and recommendations for tree protection are presented in section 1.5 and potential tree impacts are shown within the Annex D Tree Impact Plan in ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP150]. Hedgerows affected by the Scheme are identified in the Outline LEMP [APP-199] Appendix A. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [APP-017].
SNTWN-004	Arboriculture	The submitted Environmental Statement confirms that trees, hedgerows, ancient woodland, veteran features and root protection areas are material constraints across the Order Limits, but the assessment remains preliminary in key respects and continues to defer important decisions to detailed design, future arboricultural surveys and later management plans.	The findings of the tree survey and impact assessment are presented in ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]. The Applicant is committed to undertaking a further pre-construction survey and Arboricultural Method Statement in advance of the construction works The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design

ID	Theme	Representation	Applicant's Response
		The ES itself recognises that the Order Limits and Study Area contain Protected Trees and Hedgerows, including Ancient Woodland, Ancient and Veteran Trees, Tree Preservation Orders and Important Hedgerows. It also describes the wider landscape as one in which hedgerow field boundaries, woodland and wooded horizons form part of the landscape structure, with PRoW and recreational routes common throughout the Order Limits and the surrounding countryside. Appendix 7.2 confirms that multiple areas of Ancient Woodland occur within the Study Area, that several Ancient Woodland groups bound the Order Limits including the Cable Route Corridor, and that Important Hedgerows are assumed to be present across the Order Limits in the absence of a full Important Hedgerow survey.	process. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032]. There would be no loss of Ancient Woodland or veteran trees. However, it is acknowledged by the Applicant that there will be some tree and hedgerow loss. As set out in the Outline CEMP [APP-196], where tree removal is unavoidable, trees of lower quality and life expectancy will be preferably removed over those of higher quality and life expectancy. Where hedgerow removal is required, no more than 10m will be removed in accordance with the requirements set out within the Outline LEMP [APP-199] and reinstatement undertaken.
SNTWN-005	Arboriculture	The ecological baseline is also significant. Appendix 8.1 records 49 trees with veteran features within the Order Limits and a further 21 within 30 m of the site boundary, distributed across Sites 3, 4, 5, 7, 9, 10 and CRC6. It also records native hedgerows as	The Applicant notes the concern over the existing vegetation and veteran trees in particular. The Applicant acknowledges the value and assessed the potential impact on these landscape elements as part of the ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] .

ID	Theme	Representation	Applicant's Response
		present throughout the Sub-Sites, alongside arable field margins, ponds and watercourses. This confirms that the affected tree and hedgerow resource is not incidental. It is part of the defining structure of the landscape and part of the ecological network through which wildlife moves.	The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design process. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are set out in the Outline CEMP [APP-196] , Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032] .
SNTWN-006	Arboriculture	The Applicant's own consultation record shows that South Norfolk Council asked for upfront arboricultural surveys so that the baseline would be understood and would inform design development. The Applicant states that Appendix 7.10 Preliminary Arboricultural Impact Assessment provides information on the arboricultural surveys undertaken to support the application. However, Chapter 7 describes Appendix 7.10 expressly as a "Preliminary AIA" and states that it is a proportionate assessment focusing on targeted surveys within the Sites and wider surveys along the Cable Route Corridor. That is not the same as a final,	The findings of the tree survey and impact assessment are presented in ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]. The Applicant is committed to undertaking a further pre-construction survey and Arboricultural Method Statement in advance of the construction works. The Applicant will submit the final AIA, Arboricultural Method Statement, Tree Protection Plans and hedgerow impact schedules to the relevant local authority arboricultural officer and affected parish Tree Wardens for approval. The Outline CEMP [APP-196] states (Table 3.2): • 'A pre-construction tree survey will be undertaken prior to construction in accordance with BS 5837:2012 (or in line

ID	Theme	Representation	Applicant's Response
		construction-ready, tree-by-tree and hedgerow by-hedgerow assessment of all works, all access routes, all visibility splays, all AIL routes, all compounds, all haul roads and all root protection incursions.	with most recent adopted standard and industry guidelines). This survey will inform the tree protection zones to be applied during construction; • An Arboricultural Method Statement (AMS) will be adopted incorporating best practice guidance set out in British Standard 5837:2012 'Trees in relation to design, demolition and construction'. The AMS will ensure retained trees are not adversely affected during the construction works; • All tree work operations will be carried out in accordance with BS3998:2010 'Recommendations for Tree Work'; current arboricultural industry guidelines and best practice; and all relevant Health & Safety standards.' The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design process. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through

ID	Theme	Representation	Applicant's Response
			Requirements 13, 14 and 21 of the Draft DCO [AS-032] .
SNTWN-007	Arboriculture Landscape and Visual	The Applicant's own consultation record shows that South Norfolk Council asked for upfront arboricultural surveys so that the baseline would be understood and would inform design development. The Applicant states that Appendix 7.10 Preliminary Arboricultural Impact Assessment provides information on the arboricultural surveys undertaken to support the application. However, Chapter 7 describes Appendix 7.10 expressly as a "Preliminary AIA" and states that it is a proportionate assessment focusing on targeted surveys within the Sites and wider surveys along the Cable Route Corridor. That is not the same as a final, construction-ready, tree-by-tree and hedgerow by-hedgerow assessment of all works, all access routes, all visibility splays, all AIL routes, all compounds, all haul roads and all root protection incursions.	Please see response to SNTWN-006.
SNTWN-008	Arboriculture	The same problem appears in the mitigation structure. Chapter 7 says that a detailed CEMP will be secured by	Please see response to SNTWN-006.

ID	Theme	Representation	Applicant's Response
	Landscape and Visual	DCO requirement and agreed before construction, and that retention of existing trees "wherever possible" will be a key requirement. It also states that a pre-construction tree survey would be required to re-establish the baseline and inform tree protection zones, with construction exclusion zones and an Arboricultural Method Statement to be adopted in accordance with BS 5837:2012. Those measures are necessary, but they are not sufficient at the consent stage. A pre-construction survey to "re-establish" the baseline is not a substitute for a complete baseline at examination. Nor is a future Arboricultural Method Statement a substitute for deciding now whether the Scheme can be constructed without unacceptable loss, pruning, compaction, root damage or long-term decline.	
SNTWN-009	Arboriculture	The ES also confirms that vegetation loss is not merely hypothetical. Chapter 4 states that existing field access will be used wherever practicable, but that new access would be constructed where a suitable field access does not exist. It says access would be designed to avoid loss of veteran or protected trees, but	The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design process. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are set out in the Outline CEMP [APP-

ID	Theme	Representation	Applicant's Response
		also accepts that there may be localised removal of sections of hedgerows for access and visibility splays. Chapter 4 further confirms that access points must accommodate articulated HGVs, that AILs are expected to include transformers and cable drums, and that HGVs may use internal access tracks as haul routes. These are precisely the types of works that can cause crown damage, excessive pruning, root severance, soil compaction and irreversible deterioration of mature and veteran trees.	196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032]. There would be no loss of Ancient Woodland, ancient or veteran trees. However, it is acknowledged by the Applicant that there will be some tree and hedgerow loss. As set out in the Outline CEMP [APP-196], where tree removal is unavoidable, trees of lower quality and life expectancy will be preferably removed over those of higher quality and life expectancy. Where hedgerow removal is required, no more than 10m will be removed in accordance with the requirements set out within the Outline LEMP [APP-199]. As shown on the Green Infrastructure Strategy [AS-005], the Scheme would provide the strengthening/reinforcing of existing hedgerows (infill planting/laying coppicing), together with new tree and woodland planting. The prescriptions and the long-term management of the landscape and ecological measures are provided in the Outline LEMP [APP-199]. The access strategy has been developed in consultation with NCC as the Local Highway Authority. Internal haul routes have been incorporated where practicable to minimise

ID	Theme	Representation	Applicant's Response
			construction traffic effects on the Local Road Network. Site access design, swept-path analysis and visibility splays, alongside an AIL report are detailed in Appendix C and D of the ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to 177] .
SNTWN-010	Arboriculture Biodiversity Net Gain	Chapter 8 similarly accepts that minor temporary hedgerow removal will be required, typically in sections of up to 10 m, throughout the Order Limits for Cable Route Corridor works, haul routes and access requirements. It says this will be compensated through Biodiversity Net Gain delivery targets, new hedgerow planting and management through the Outline LEMP and Outline CEMP. That approach understates the arboricultural and ecological function of old hedgerows and mature boundary trees. Removal of a short section may look limited on a plan, but where repeated across the Cable Route Corridor, haul routes, access points, visibility splays and AIL routes, it can fragment linear habitat, expose retained trees to edge effects and permanently alter the structure and age-profile of the landscape.	The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design process. Where loss is required to facilitate construction of the Scheme this has been considered in the Environmental Statement. The effect of the loss of landscape features including trees and hedgerow for construction and to provide access are reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. Matters relating to habitat functionality, including the implications of hedgerow reinstatement and habitat recovery, are addressed within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. Where temporary hedgerow loss is required the Green Infrastructure Strategy [AS-005] identifies replacement which supports integration of the Scheme within the environment. In addition the Scheme includes delivery of new woodland belts,

ID	Theme	Representation	Applicant's Response
			native tree planting and hedgerows to supports green infrastructure connectivity.
SNTWN-011	Landscape and Visual	The Landscape Assessment Tables confirm the same point. They identify loss of landscape features along the Cable Route Corridor, including trees and sections of hedgerow, impacts on Important Hedgerows, and effects on field patterns due to loss of hedgerows and trees. In places these effects are assessed as Major Adverse and Significant or Moderate Adverse and Significant. The Applicant cannot rely on hedgerows, tree belts and woodland structure to screen and assimilate the Scheme while also treating the disturbance, pruning, removal and later reinstatement of those same features as minor or readily compensable.	The Applicant acknowledges the loss of landscape features and the assessment acknowledges that, in certain locations along the Cable Route Corridor, construction activities may require the temporary removal of sections of hedgerow, individual trees or other landscape features. the effect on landscape due to loss of landscape features are reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. However, these findings do not undermine the assessment's conclusions regarding the wider landscape character. The assessment distinguishes between temporary construction effects and the long-term landscape condition following reinstatement. It is appropriate for the assessment to recognise both: (i) the contribution that existing hedgerows, tree belts and woodland make to landscape character and visual containment; and (ii) the temporary adverse effects that may arise where sections of those features are disturbed during construction. These are not contradictory positions but reflect the assessment of different project phases and timescales.

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SNTWN-012	Protected species	This is also a protected species issue. Chapter 8 records that 621 trees are considered to have potential to support roosting bats, including 577 within Sites 1–10 and the BESS Site and 44 within the CRC and Highway Improvement Works boundaries. It recognises that loss of trees capable of supporting roosting bats could result in direct harm, population fragmentation and habitat degradation. The ES also concludes that the Order Limits and surrounding landscape support nationally important assemblages of foraging and commuting bats, including nationally rare barbastelle, with hedgerows, tree lines, mature trees and field margins providing supporting habitat within multiple barbastelle maternity roost Core Sustenance Zones.	Table 8.13 of ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] confirms that roosting and foraging/commuting barbastelle bats are of National Importance. An understanding of the presence of bats and the distribution of bat roosts, including Barbastelle maternity roosts is included in Tables 3.3 and 3.4 of ES Volume 3, Appendix 8.5 Ground Level Tree Assessment report [APP-156] and Appendix 8.6 - Bat Activity Survey report [APP-157]. As a precautionary measure, the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and the Works Plan [AS-002 and AS-003] include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits have and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges). To safeguard the species, the Applicant has adopted precautionary measures, through embedded design principles detailed within the Design Principles, Parameters and Commitments [APP-213] illustrated within ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. These include the above-mentioned

ID	Theme	Representation	Applicant's Response
			30m standoff distance from ancient woodlands, at least 15m from non-ancient woodlands, 30-50m pond buffers, and minimum of 10m buffer between hedgerows and ditches/watercourses and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar Solar PV developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree/scrub planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199]. When considering the scale of the Scheme, this, will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure. Thereby, resulting in extensive landscape-wide habitat provision for the benefit of all local bat populations (amongst other species), thereby contributing towards the species favourable conservation status. The assessment in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] during construction, operation and decommissioning for both roosting and foraging/commuting bats (Paragraphs 8.9.579 to 8.9.629) identified measures which will be put in place and secured

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			by the Outline CEMP [APP- 196], Outline LEMP [APP-199] and Outline DEMP [APP-198], including avoiding works close to woodland, designing out impacts to woodland, trees and hedgerows as much as possible with the establishment of buffers and stand-off distances; avoidance of night time working; adoption of a sympathetic lighting strategy as per Section 4 of ES Volume 3, Appendix 7.11 - Lighting Strategy [App-151] and the implementation of pollution prevention and control measures. The Outline LEMP [App-199] has incorporated a number of enhancements including the erection of bat boxes to provide artificial roosting opportunities for all species of bats. The Applicant considers that the assessment made for Barbastelle bats and the impacts of the Scheme have been appropriately applied and mitigated for.
SNTWN-013	Bats	Appendix 8.6 goes further. It assesses the bat assemblage across the Order Limits as of national importance and records barbastelle activity at every survey location. Its conclusion is that the Order Limits provide good foraging and commuting resources for bats above what would generally be expected from the moderate-quality habitats present,	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including bats. The Ecology and Biodiversity chapter has been underpinned by ground level tree assessments for roosting bats, and bat activity surveys, as detailed within ES Volume 3, Appendix 8.5 – Ground Level Tree Assessment

ID	Theme	Representation	Applicant's Response
		and that mature trees, hedgerows and tree lines may provide smaller roost sites as well as foraging and commuting habitat. Independent published research on ground-mounted solar PV has also found significant negative effects on bat activity and recommends that solar developments be screened for ecological impacts with appropriate mitigation and monitoring.	[APP-156] and ES Volume 3, Appendix 8.6 – Bat Activity Report [APP-156] respectively. For barbastelle bats specifically, the Applicant refers to its response to BEPSG-013.
SNTWN-014	Buffers	It follows that trees and hedgerows cannot be assessed only as landscape screening or generic habitat units. They are functional ecological infrastructure. The ES relies heavily on the assumption that retained hedgerows, 10 m hedgerow buffers, 15 m tree and woodland buffers, temporary reinstatement and future planting will be sufficient. But the ES does not provide a clear, route-wide analysis of cumulative hedgerow severance, gap creation, loss of veteran-tree buffer integrity, construction lighting, haul-road disturbance, access widening, visibility splays, or the period required for replanted hedgerows to become	The Applicant agrees that trees, hedgerows and woodland features provide important ecological as well as landscape functions. However, the Applicant does not agree that the Environmental Statement treats these features solely as landscape screening or generic habitat units, nor that the assessment relies on unsubstantiated assumptions regarding mitigation effectiveness. The matters raised encompass landscape, ecological and construction-related considerations, and are therefore assessed through the relevant Environmental Statement chapters to ensure they are considered by the appropriate technical specialists. Effects on landscape character, visual amenity, have been assessed within in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043].

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		functionally equivalent for bats and other wildlife.	Matters relating to habitat functionality, including the implications of hedgerow reinstatement and habitat recovery, are addressed within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Environmental Statement therefore considers these issues through the appropriate technical disciplines and does not rely solely on landscape mitigation to address ecological effects. The measures referenced by the respondent, sets out the minimum offset distances within the design for the trees and hedgerows that will be retained, as detailed in The Design Principles, Parameters and Commitments [APP-213], are not assumptions but form part of the Scheme's design and mitigation strategy. These measures have been developed to avoid or minimise effects on both landscape features and ecological receptors. Hedgerow removal is included in Appendix A of in the Outline LEMP [APP-199]. To safeguard bat species, the Applicant has adopted a precautionary measure, through embedded design principles detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 -Indicative Masterplan [APP-059]. These include a 30m standoff distance

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			from ancient woodlands, at least 15m from woodlands, 10m from watercourses, and a minimum of 10m buffer between hedgerows/ditches and solar PV apparatus; which is double the standard approach of 5m very commonly adopted in the design of similar developments. These buffer zones will be managed for biodiversity, with grassland mosaic, hedgerow enhancements, tree planting all proposed, with long-term management for the benefit of biodiversity, as detailed within the Outline LEMP [APP-199]. Requirement 7 in the Draft DCO provides that no part of the authorised development may commence until a detailed LEMP has been approved by the relevant planning authority in consultation with Natural England. The detailed LEMP must be substantially in accordance with the Outline LEMP. The detailed LEMP must be implemented as approved. When considering the scale of the Scheme, this, will result in a significant amount of gain in linear habitats surrounding the Solar PV areas, providing enhanced foraging and commuting routes for all bat species present away from the solar PV infrastructure. In addition, the above-named documents also include commitments, to extensive buffering of woodlands/ancient woodlands, ponds, trees, and

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			watercourses and will include habitat creation/management within these buffer zones. Thereby, resulting in extensive landscape-wide habitat provision for the benefit of all local bat populations (amongst other species).
SNTWN-015	PEIR	The earlier procedural concern about the PEIR therefore remains live, although it must now be framed against the submitted ES. The PEIR was required to provide information reasonably required for consultees to develop an informed view of the likely significant environmental effects of the development. The Applicant's own ES says the PEIR was intended to allow consultees to understand likely significant effects and respond before finalisation of the DCO application and EIA. Yet the full arboricultural position, including the Preliminary AIA, the identified buffer clashes, the extent of veteran-feature trees, the roosting-bat tree resource, the hedgerow removals and the detailed reliance on future surveys and later method statements, was not available to the Tree Warden Network and local communities during the main statutory consultation.	The purpose of the PEIR is to enable consultees to understand the likely significant environmental effects of the Scheme. The PEIR presented preliminary findings of the environmental assessments undertaken at the point of writing in accordance with the requirements of the PEIR process. An Arboricultural Technical Note was included in the PEIR at Appendix 7.8 which summarised the known arboricultural features at and around Sites based on the tree surveys undertaken. It is not possible nor is it expected that the full documentation relating to the finalised Scheme will be available at the PEIR stage. Following submission of the PEIR, the scheme was updated as set out in the Design Approach Document [APP-212] Ecological information available at that time was included and referred to within the PEIR. The Applicant acknowledges that Ecology surveys were ongoing at the time of the PEIR production, and therefore, not available at that time. Full ecological baseline information was available and

ID	Theme	Representation	Applicant's Response
			referred to within ES Volume 1, Chapter 8: Ecology and Biodiversity [APP-044]. The findings of the tree survey, tree constraints plan and tree impact plan is presented in ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]. The Applicant is committed to undertaking a further pre-construction survey and Arboricultural Method Statement in advance of the construction works.
SNTWN-016	Targeted Consultation	The Targeted Consultation does not cure this defect. The ES states that targeted consultation took place between 22 October and 26 November 2025 following changes to the development boundary, including changes near Site 1, the National Grid Substation Site and Site 7D, additional land, AIL routes and general construction traffic routes. It also records the Applicant's position that these changes did not give rise to materially new or different likely significant environmental effects. That conclusion is not accepted. Changes to AIL routes, access routes, visibility splays, construction traffic and land take are directly relevant to tree and hedgerow harm. Without a final	The tables summarising tree impacts (Table 1.4 to 1.6) and tree impact plan (Annex D) are included in the ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150]. There would be no loss of Ancient Woodland, ancient or veteran trees. As set out in the Outline CEMP [APP-196], where tree removal is unavoidable, trees of lower quality and life expectancy will be preferably removed over those of higher quality and life expectancy. The effects of construction traffic, access routes and AIL movements have been assessed within ES Volume 1 Chapter 11, Transport and Access [APP-047] alongside the ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to 177], Outline CTMP [APP-201] and Outline PRow and Permissive Paths Management Plan [APP-203]. Site access design, swept-path analysis and vehicle tracking has also been prepared to

ID	Theme	Representation	Applicant's Response
		arboricultural schedule and impact plan, consultees could not meaningfully test whether the changes would require pruning, removal, root protection incursion, compaction or damage to veteran and mature trees.	determine suitability for access on the proposed routes for construction vehicles, and this is detailed in Appendix C of the ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to 177]. The access strategy has been designed and developed in consultation with NCC as the Local Highway Authority, and this has informed the assessment and mitigation measures proposed. While the final access strategy and AIL requirements will be subject to detailed design, the assessment of effects with regards to transport is considered robust and has been prepared in alignment with industry standard IEMA guidance. The detailed CTMP to be prepared by Requirement of the Draft DCO [AS-032] will be largely in accordance with the outline report, and the Applicant will continue to liaise with NCC as the Local Highway Authority on the development of the access strategy and proposed management and mitigation measures.
SNTWN-017	Policy compliance	The legal and procedural point is therefore straightforward. The Planning Act 2008 requires consultation with prescribed bodies and local communities, publicity of the application, and regard to consultation responses. The ES methodology states that EIA for an NSIP requires baseline studies,	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The acceptance of the Applicant's application for examination by the

ID	Theme	Representation	Applicant's Response
		consultation, identification of likely significant environmental effects, mitigation where available and appropriate, and assessment of residual effects. Where the submitted ES still leaves arboricultural impacts dependent on indicative access routes, future iterations of the AIA, pre-construction baseline resurvey and later method statements, the assessment is not sufficiently certain for affected tree owners, parish Tree Wardens, councils or the public to understand the final tree and hedgerow impacts.	Planning Inspectorate serves as confirmation that the Applicant has fulfilled its statutory pre-application duties. This process is provided in the Consultation Report [APP-024], which details the Applicant's approach to pre-application consultation. The Applicant also notes that the examination process provides a further opportunity for Interested Parties to comment on the Scheme. This examination is managed by the independently appointed Examining Authority. Further to this, the Applicant provided an extended Relevant Representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an interested party. Additionally, the EIA presented within the ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent. ES Chapter 2: Environmental Impact Assessment Methodology [APP-038] sets out for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements

ID	Theme	Representation	Applicant's Response
			where flexibility needs to be retained and has been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring the worse-case overall impacts are predicted.
SNTWN-018	Arboriculture	First, the Applicant should be required to submit a final Arboricultural Impact Assessment, not merely a Preliminary AIA, covering the whole Order Limits, Cable Route Corridor, highway works, AIL routes, visibility splays, construction compounds, temporary and permanent accesses, haul routes, drainage works and decommissioning assumptions. That assessment should identify every tree, group, woodland, hedgerow and veteran or ancient feature affected, with a clear schedule of retention, removal, pruning, RPA incursion, canopy clearance, excavation, surfacing, temporary protection and reinstatement.	The ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] has recorded the tree features which have the potential to be impacted by the development proposals, in particular all ancient or veteran trees in Section 1.4, assessed the potential tree impacts based on Works Plan [AS-002 and AS-003] and Outline Cable Route Construction Statement [APP/7.21] in Section 1.5, and suggested appropriate tree protection measures to mitigate any negative impacts on existing tree features in Section 1.6. The Applicant is committed to undertaking a further pre-construction survey and Arboricultural Method Statement in advance of the construction works. This staged approach ensures an up-to-date tree survey is conducted prior to construction and avoid impacts to ancient and veteran trees and ancient woodlands in the design stage.
SNTWN-019	Tree Protection Plans	Second, the Applicant should provide final Tree Protection Plans and Root Protection Area plans at a scale suitable	The Applicant has provided Tree Impact Plan in Annex D in the ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment

ID	Theme	Representation	Applicant's Response
		for examination, showing construction exclusion zones, no-dig areas, fencing, ground protection, haul-road stand-offs, storage exclusions, crane or delivery manoeuvring areas, lighting exclusion zones and chemical/fuel exclusion zones.	[APP-150] instead of Tree Protection Plans due to design flexibility there is no fixed layout on the fencing or ground protection. Construction exclusion zones will be introduced around Root Protection Areas of retained trees and protected by temporary fencing, details of the mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032]. The Tree Constraints Plan presented in Annex C in the ES Volume 3, Appendix 7.10 – Preliminary Arboriculture Impact Assessment [APP-150] is equivalent to Root Protection Area plans, showing the root protection areas of all surveyed tree features.
SNTWN-020	Buffers	Third, the four identified clashes between indicative access routes and ancient/veteran tree buffer zones must be resolved before consent. The DCO should not permit those conflicts to be resolved later within a flexible Work No. 4 envelope. If an access route, visibility splay, AIL manoeuvre or haul road cannot be delivered without intruding into an ancient or veteran tree buffer, that should be treated as an	The access routes are indicative at this stage, and there will be flexibility to relocate the site access at detail design to avoid direct or indirect impacts on ancient and veteran trees. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the ancient or veteran trees to ensure no excavation works will be undertaken within the ancient or veteran tree buffer zone.

ID	Theme	Representation	Applicant's Response
		environmental constraint requiring redesign, not as a construction detail.	Requirement 5 provides that no part of Work No. 4 may commence until details of the layout; scale; proposed finished ground levels; external appearance; hard surfacing materials; and vehicular and pedestrian access, parking and circulation areas, relating to that part have been approved by the relevant planning authority. The details submitted must accord with the Design Principles, Parameters and Commitments. Additionally, the EIA presented within the ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent. ES Chapter 2: Environmental Impact Assessment Methodology [APP-038] sets out for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained and has been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring the worse-case overall impacts are predicted.
SNTWN-021	Veteran trees	Fourth, all veteran trees, ancient trees, high-value mature trees, trees with	There would be no loss of Ancient Woodland, ancient or veteran trees. Where tree removal is

ID	Theme	Representation	Applicant's Response
		potential roost features, ancient woodland edges and Important Hedgerows should be subject to a presumption of avoidance. Where harm is alleged to be unavoidable, the Applicant should be required to justify that harm by reference to a specific plan, a specific construction need and a specific alternatives assessment.	unavoidable, trees of lower quality and life expectancy (BS5837:2012 Category U and C trees) will be preferably removed over those of higher quality and life expectancy (BS5837:2012 Category A and B trees), as set out in the Outline CEMP [APP-196] . Requirement 13 in the Draft DCO [AS-032] provides that no part of the authorised development may commence until a detailed CEMP has been approved by the relevant planning authority. The detailed CEMP must be substantially in accordance with the Outline CEMP [APP-196] . The detailed CEMP must be implemented as approved.
SNTWN-022	Arboriculture	Fifth, an independent arboricultural clerk of works and ecological clerk of works should be secured for all vegetation works, access works, AIL route works, trenching, HDD compounds, haul routes and reinstatement. Their role should include pre-works inspection, supervision during works, authority to stop works, photographic records, post-works reporting and monitoring for delayed decline.	The Applicant confirms that an independent arboricultural clerk of works and ecological clerk of works will be responsible for site monitoring and supervision of all vegetation and construction works as secured through the Outline CEMP [APP-196] .
SNTWN-023	Arboriculture	Sixth, post-construction monitoring should be secured for retained veteran and mature trees, hedgerows and	There would be no loss of Ancient Woodland or veteran trees.

ID	Theme	Representation	Applicant's Response
		affected woodland edges. Monitoring should expressly address compaction, root damage, branch failure, fungal infection, bark damage, soil contamination, hydrological changes and delayed decline. Replacement planting alone is not an adequate remedy for the loss or deterioration of trees that may have developed over centuries.	The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design process. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032]. The proposed implementation, management and monitoring of the landscape measures and features during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through Requirement 7 in the Draft DCO [AS-032]. The Outline LEMP commits to development management plans for veteran trees in para 3.1.2. Furthermore, para 3.2.5 commits to regular assessment and monitoring of trees and woodland within the draft Order Limits to identify any required pruning or maintenance which will be carried out as necessary. Likewise long term monitoring of hedgerows is committed to in para 3.3.27.

ID	Theme	Representation	Applicant's Response
SNTWN-024	Arboriculture	Seventh, no vegetation clearance, pruning, access construction, visibility-splay work, AIL enabling work, trenching, haul-road construction or compound establishment should be permitted until the final AIA, Arboricultural Method Statement, Tree Protection Plans and hedgerow impact schedules have been approved following consultation with the relevant local authority arboricultural officer and affected parish Tree Wardens.	The Applicant is committed to undertaking a further pre-construction survey and Arboricultural Method Statement in advance of the construction works. The Applicant will submit the final AIA, Arboricultural Method Statement, Tree Protection Plans and hedgerow impact schedules to the relevant local authority arboricultural officer and affected parish Tree Wardens for approval The Outline CEMP [APP-196] states (Table 3.2): • <i>'A pre-construction tree survey will be undertaken prior to construction in accordance with BS 5837:2012 (or in line with most recent adopted standard and industry guidelines). This survey will inform the tree protection zones to be applied during construction;</i> • <i>An Arboricultural Method Statement (AMS) will be adopted incorporating best practice guidance set out in British Standard 5837:2012 'Trees in relation to design, demolition and construction'. The AMS will ensure retained trees are not adversely affected during the construction works;</i> • <i>All tree work operations will be carried out in accordance with BS3998:2010 'Recommendations for Tree Work'; current arboricultural industry guidelines and best</i>

ID	Theme	Representation	Applicant's Response
			<i>practice; and all relevant Health & Safety standards.'</i> Requirement 13 in the Draft DCO provides that no part of the authorised development may commence until a detailed CEMP has been approved by the relevant planning authority. The detailed CEMP must be substantially in accordance with the Outline CEMP [APP-196]. The detailed CEMP must be implemented as approved.
SNTWN-025	Arboriculture	The Tree Warden Network's objection is not to ordinary woodland management or necessary safety works. It is to the risk that mature trees, veteran features and important hedgerows may be damaged or lost for temporary construction convenience, AIL routing, access geometry, visibility splays or post-consent design flexibility. Such harm may not be visible immediately. Damage from soil compaction, root severance, excessive pruning, altered drainage, pathogens, fungi and decay can emerge over many years. The value of veteran trees, old hedgerows, mature oaks, ash, hornbeam and associated deadwood habitat cannot be recreated by planting saplings elsewhere.	The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and hedgerows taken into consideration in the design process. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. There would be no loss of Ancient Woodland, ancient or veteran trees. Further mitigation measures to avoid damage from soil compaction, root severance and excessive pruning are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198] that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032].

ID	Theme	Representation	Applicant's Response
SNTWN-026	Arboriculture	There should also be assurances that there will be no cutting back of trees in woodland (ancient or otherwise) adjacent to the sites during the life of the scheme to prevent operational impacts from normal tree growth such as shading; leaf, sap or seed fall; or root disturbance or any other impact deemed to arise from trees.	The 15m minimum offset distance and 30m minimum offset distance will be applied for the Solar PV Modules, substations, site compounds and buildings to non-Ancient Woodland and Ancient Woodland respectively as set out in the Design Principles, Parameters and Commitments [APP-213] to assure no cutting back or root disturbance of trees in woodland adjacent to the sites.
SNTWN-027	Arboriculture	The ES has improved the evidential picture compared with the PEIR, but it has also confirmed the seriousness of the issue. The application should not be treated as arboriculturally acceptable as it does not demonstrate that the Scheme can be constructed, operated and decommissioned without unacceptable harm to South Norfolk's mature tree, hedgerow, veteran tree and woodland resource.	The Applicant is committed to retaining trees and hedgerows as far as practicable, with mature tree, hedgerow, veteran tree and woodland taken into consideration in the design process as secured in the in the Outline CEMP [APP-196]. The Design Principles, Parameters and Commitments [APP-213] sets out the minimum offset distances within the design for the trees and hedgerows that will be retained. As set out in the Outline CEMP [APP-196], where tree removal is unavoidable, trees of lower quality and life expectancy will be preferably removed over those of higher quality and life expectancy. Where hedgerow removal is required, no more than 10m will be removed in accordance with the requirements set out within the Outline LEMP [APP-199]. Further mitigation measures are set out in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]

ID	Theme	Representation	Applicant's Response
			that are secured through Requirements 13, 14 and 21 of the Draft DCO [AS-032] .

6.9 The Church & Town Estates Property Charity

Table 2.19 The Applicant's Response to The Church & Town Estates Property Charity [\[RR-1916\]](#)

ID	Theme	Representation	Applicant's Response
CTEPC-001	Compulsory Acquisition	We own land identified in the East Pye Application as potentially required as a cable route corridor. The trustees of the charity therefore consider it essential to register as an interested party in order that their concerns and related issues can be taken into account during the examination of the application. We will be submitting a more detailed written representation later.	The Applicant notes the concerns raised by the Church & Town Estates Property Charity regarding the potential acquisition of land associated with its interests. The Applicant understands the Charity's interest relates to an unregistered parcel of land at Lundy Green, NR15 2NU. This land was identified as Parcel 239 within the initial cable route search area and was therefore considered during the early stages of route development. However, following the refinement of the cable route through site surveys, environmental assessments and landowner engagement, the route was amended and this parcel is no longer required for the Scheme. Consequently, the land is not included within the Order Limits and is not subject to compulsory acquisition. The Applicant refers the Church & Town Estates Property Charity to the Sheet 12 (page 14) of the Land Plan [APP-006], which shows the extent of the order limits in this location. The Applicant therefore considers that the concerns raised relate to an earlier stage of the

ID	Theme	Representation	Applicant's Response
			Scheme's development and confirms that no powers are sought over the Charity's land as part of the Application.

6.10 The Lord Fuller OBE

Table 2.20 The Lord Fuller OBE [\[RR-1919\]](#)

ID	Theme	Representation	Applicant's Response
LF-001	Soils and Agriculture	My name is John Fuller. I am the elected Councillor for Brooke Ward on South Norfolk Council and served for 17 years as the Leader of the Council until May 2024. In February 2024 I received a Life Peerage and sit in the House of Lords, where I make contributions on matters including farming, agriculture, the environment and related matters. I OBJECT to the proposal on the basis that 86pc of the land covered by the East Pye proposal is of the Best and Most Versatile category and only 3pc is considered unproductive or in non-agricultural uses. This is contrary to the March 2026 Land Use Framework, which preferentially reserves the best land for food production.	The breakdown of Agricultural Land Classification grades is presented in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] which shows that based on ALC surveys carried out to date, BMV covers 68.4% of the Order Limits. The Planning Statement [APP-209], draws upon chapter 15 of the ES and states: <i>'As detailed in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15], an ALC survey of the Sites was undertaken, which excluded the CRC. This confirmed that land within the Sites of the Order Limits was a mix of mostly Grades 2 and 3a, with areas of Grade 3b, and small areas of Grade 4. BMV quality land within the Sites amounts to 829.1ha (78.7% of the Sites only; or 68.4% of the Order Limits).'</i> The Land Use Framework is not a material consideration for the preparation of development plans or for making decisions on planning applications or NSIPs. The LUF sets out that BMV farmland will be safeguarded from permanent land use change by publishing new ALC maps. These

ID	Theme	Representation	Applicant's Response
			new ALC maps identify most of Norfolk as BMV quality. The areas of BMV that have the potential to be permanently affected (National Grid Substation and pylons; BESS; Project Substations) amount to 37.9 Ha (worst case) as set out in Table 15.14 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. As noted in paragraph 15.8.110 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] ‘<i>Norfolk as a County has an estimated area (from the provisional ALC maps from the 1970s) of the order of 479,000ha of agricultural land. Over 433,000ha of this is Grades 1, 2 and 3a</i>’. Paragraph 15.8.112 states ‘<i>The amount of land within the Order Limits is approximately 0.22% of the land within the County, and 1.2% of South Norfolk agricultural land. This is a negligible quantum on a regional basis. Therefore in terms of the use of BMV land, the regional impact is therefore considered to be negligible, which is not significant</i>’.
LF-002	Soils and Agriculture	My evidence of land use comes from the applicant's own analysis in Binder 10 of 13, in particular from the table in PEIR Appendix 15.1 – Agricultural Land Classification of land covered by the proposal, which I reproduce below with percentages	BMV is defined in the NPPF 2024 as land in Grades 1, 2 and 3a. Subgrade 3b is not BMV land and is poorer quality land. The most up to date information relating to BMV land is presented in the DCO Application and supersedes that of the PEIR.

ID	Theme	Representation	Applicant's Response
		Grade A B C D E F Total Proportion BMV Percentage Grade 2 201.1 46.1 3.3 434 86.3 55.3 826.1 56% Grade 3a 168.7 36.8 140 43.4 3.3 39.5 431.7 29% 1257.8 86% Grade 3b 145.1 20.4 1.5 3.3 170.3 12% Grade 4 12.7 14.7 0.7 2.2 30.3 2% Non Ag 4.6 1.3 2 1.6 9.5 1% 210.1 14% 532.2 119.3 147.5 484.5 89.6 94.8 1467.9 100% Source – East Pye Solar What this table reveals are that the Total land area in the Best and Most Versatile category [Grades 2 & 3a] represents 86 percent of the entire proposal. A further 12 percent represents productive land, that is Grade 3b. Only 3 percent of the proposed area covered by poorer land in Grade 4 or non-Agricultural uses.	The breakdown of Agricultural Land Classification grades is presented in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] which shows that based on ALC surveys carried out, BMV covers 68.4% of the Order Limits. The policy position in respect of the use of land of BMV quality is set out in NPS EN-1, with 2.10.137 noting that the economic and other benefits of BMV land should be taken into consideration. These matters are considered in the ES Chapter 15. The Land Use Framework is not a material consideration for the preparation of development plans or for making decisions on planning applications or NSIPs. The LUF sets out that BMV farmland will be safeguarded from permanent land use change by publishing new ALC maps. These new ALC maps identify most of Norfolk as BMV quality. The development is temporary. Note the response above at LF-001, in respect of potential permanent BMV losses as a consequence of the Scheme.
LF-003	Soils and Agriculture	On 18 Mar 2026 — The Land Use Framework for England was published by The Government setting out how it felt we can use our land more effectively.	The Applicant notes this comment. As detailed in the Site Selection Assessment [APP-215] , the Applicant has followed a staged approach to site selection, with consideration to a range of planning, environmental and operational factors and the project

ID	Theme	Representation	Applicant's Response
		https://assets.publishing.service.gov.uk/media/69c69033471d520038d0f7a6/Land_Use_Framework_Accessible.pdf It restricts the use of solar developments on the Best and Most Versatile land. Ministers have re-stated this on the record at the Despatch Box in Parliament The DESNZ Minister Lord Whitehead speaking in the winding of the Clean Power 2030 Action Plan: Rural Communities debate in the House of Lords on Wednesday 22 April 2026 said ...that is what the land use framework says on the best estimates for the land that is being taken. In addition to that, he and other noble Lords will be aware that, in the guidance and arrangements for the development of solar, there is a clear understanding that the best and most versatile land will be excluded from those solar developments and that they should go primarily on brownfield land or less-important agricultural land, so that precisely that best and most versatile land for farming and food use is preserved for that activity. That is what	objectives. These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3, including consideration of the avoidance of Best and Most Versatile (BMV) agricultural land. At Stage 2 of the site selection process, all ALC Grade 1, 2 and 3 land was excluded from the initial search area; and no suitable previously developed sites of sufficient area to accommodate a 500MW utility-scale solar project were identified. The Applicant draws attention to ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], supported by ES Volume 3, Appendix 15.1 – Agricultural Land Classification [APP-182], which presents the findings of detailed ALC surveys undertaken for the Order Limits and the likely significant effects of the Scheme on soils and agricultural land. Once the cable has been laid underground in the Cable Route Corridor during construction, the land will be reinstated and soils restored to the previous condition as far as practicable, as set out in the Outline Soils Resource and Management Plan [APP-204], allowing for activities such as farming to continue. The Applicant is seeking a time-limited consent for the Scheme to have an operational period of up to 60

ID	Theme	Representation	Applicant's Response
		is happening with the solar developments coming forward at the moment. https://hansard.parliament.uk/Lords/2026-04-22/debates/22B9515A-2CC4-4B7E-8D9A-8D5F193E9F84/details#contribution-3AEF3BC2-6BB7-463D-A432-2F59F8616DF6 Turning to the national inventory of the best and most versatile land throughout England, The House of Lords library wrote to me on 12th December 2024 as follows "Only estimates for the for the proportion of land by ALC grade appear to be available due to an incomplete dataset at the field and grade 3 subgrade level across England as a whole. For example in 2012, Natural England, the government's advisory body for the natural environment in England, said in an information note that has not since been updated (p 2): Current estimates are that grades 1 and 2 together form	years, with decommissioning to take place following cessation of operation. This is secured by Requirement 21 in Schedule 2 of the Draft DCO [AS-032]. At the end of the Scheme's operational life, apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned and the land returned to the landowner, as set out in the Outline DEMP [APP-198]. The planning balance, including consideration of the loss of agricultural land, is set out in the Planning Statement [APP-209]. The LUF states "it is for farmers and landowners to decide how best to use their land, and some development or habitat restoration may still be proposed on BMV land. Where this is the case, there may be the potential for multifunctionality". Multifunctionality is exemplified in the LUF as solar generation designed to enable the continued grazing of animals. Grazing of sheep is proposed and is further explained in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051].

ID	Theme	Representation	Applicant's Response
		about 21% of all farmland in England; subgrade 3a also covers about 21%. The Campaign to Protect Rural England, now known as CPRE, the countryside charity, has noted that at that time the Department for Environment, Food and Rural Affairs (Defra) estimated that the total area of farmed land in England was 8.9mn hectares, suggesting that just under 3,750,000 hectares of farmland (42%) was 'best and most versatile' agricultural land in 2012."	
LF-004	Soils and Agriculture	The Land Use Framework represents new national policy and guidance. It is generally accepted that the quantity of BMV land in England is between 39% or 42%. Considering the East Pye proposal, which the promoters' evidence shows is 86% BMV land, I note that the proportion of the BMV land exceeds the national proportion of such land by a factor of over two, and that only 3pc is unproductive, the proposal is contrary to national land use policy. Such developments should be concentrated on the poorest land, which should be	The Applicant notes this comment. A response to this matter has been provided at LF-003. Cranfield University created a report for the creation of the New Predictive ALC Map for England (RDE118). RDE118 sets out that 50.9% of agricultural land in England is predicted to be of BMV quality (Grades 1, 2 and 3a). Policy does not preclude development on BMV land. In Norfolk the Predictive Agricultural Land Classification Map for England, published since the ES was published, shows most of Norfolk to be predicted to be of BMV quality. The Planning Statement [APP-209] states:

ID	Theme	Representation	Applicant's Response
		exhausted before the best land is considered. At 86pc best and most versatile land, this application is now clearly contrary to national land use policy. The percentage of BMV land at East Pye is exactly double the highest estimate of national proportion of such land. On this basis, the East Pye proposal should be judged contrary to policy and refused.	<i>'Norfolk as a County has an estimated area (from the provisional ALC maps from the 1970s) in the order of 479,000ha of agricultural land. Over 433,000ha of this is Grades 1, 2 and 3a. As calculated in ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15], the proportion of BMV land in Norfolk is approximately 53%, which is higher than the national average and, for South Norfolk, the proportion is 42%, equivalent to the national average. The amount of BMV quality land within the Order Limits is approximately 0.22% of the land within the County and 1.2% of South Norfolk agricultural land.'</i> Paragraph 15.8.112 of ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] states: <i>'The amount of land within the Order Limits is approximately 0.22% of the land within the County, and 1.2% of South Norfolk agricultural land. This is a negligible quantum on a regional basis. Therefore, in terms of the use of BMV land, the regional impact is therefore considered to be negligible, which is not significant.'</i>

6.11 The Ramblers – Norfolk Area

Table 2.21 The Applicant's Response to The Ramblers - Norfolk Area [\[RR-1921\]](#)

ID	Theme	Representation	Applicant's Response
TRNA-001	Landscape and Visual	We consider the screening of the panels from the walking routes to have been given a low priority. The screening offered seems to be expected after the half-life of the proposed scheme. We think that there should be a fair amount of screening after about 7 years.	A Green Infrastructure Strategy [AS-005] has been developed for the Scheme, which includes the strengthening and reinforcement of existing hedgerows through infill planting, laying and coppicing, together with new tree, woodland and hedgerow planting. These measures are intended to provide visual screening, enhance landscape structure and assist in integrating the Scheme into the surrounding landscape. The LVIA, presented in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043], assesses landscape and visual effects during construction, at Year 1 of operation and at Year 15, when the proposed mitigation planting is assumed to be established. The use of Year 15 is a standard assessment scenario to understand the likely long-term effectiveness of the mitigation. It is anticipated that the mitigation planting would provide an increasing degree of screening and filtering of views as it establishes, with noticeable benefits likely to be evident within the first few

ID	Theme	Representation	Applicant's Response
			years of operation. The extent of screening achieved at Year 7 would vary depending on the landscape typology, species, location and growing conditions, but the effectiveness of the planting would progressively increase over time.
TRNA-002	Landscape and Visual	When people go for a walk in the countryside they hope to see fields of crops and grass, hedges and woods. Green spaces give people relaxation. This is why people who cannot always get out into the countryside from towns, try to incorporate parks in their walking routes. The East Pye Solar array is going to impose views of solar panels on the village residents and visitors as they walk their local paths. The mitigation measures proposed seem a bit nebulous. Below is a view of the solar array constructed at Bracon Ash taken from Footpath. Two photographs, taken in March 2025, have been placed next to one another, the right hand one being the view along the footpath, and the left hand one looks toward the solar panels. The mitigation provided is in the form of the two rows of cuttings inside the plastic	The Applicant acknowledges the value that local residents and visitors place on the landscape, including the opportunity to experience open countryside, fields, hedgerows, woodland and other landscape features while using PRow. The Applicant also recognises that landscape change can adversely impact the visual amenity experienced by users of local footpaths. The effects of the Scheme on landscape and visual receptors have been assessed in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. The assessment identifies where significant landscape, and visual effects would occur and takes account of the proposed mitigation measures. A Green Infrastructure Strategy [AS-005] has been developed for the Scheme which includes the reinforcement and enhancement of existing hedgerows, together with new hedgerow, tree and woodland planting. These measures are intended to provide visual filtering and screening where

ID	Theme	Representation	Applicant's Response
		protection. It is unknown when these will grow into an effective green screen. Below is a photograph taken this year on 3 June from the same position. About half a dozen plastic protectors have hawthorn leaves showing out of the tops. I think that this is the second year of growth. The fencing behind I assume to be for the exclusion of deer. The path is still regularly walked because it is part of someone's regular circuit, but it must diminish their enjoyment.	appropriate, whilst also strengthening the existing landscape framework and delivering wider biodiversity benefits. The Applicant acknowledges that newly planted vegetation does not provide immediate screening and requires time to establish. However, the proposed planting would progressively increase in effectiveness as it matures, resulting in a corresponding reduction in visual effects over time. The implementation, management and monitoring of landscape mitigation during construction and operation are secured through the Outline LEMP [APP-199], secured by a requirement in the Draft DCO [AS-032], helping to ensure that the proposed mitigation is established and maintained in accordance with the approved strategy.
TRNA-003	Landscape and Visual	What we would like to see by way of mitigation are hedges of about 2 metres height within about 7 years. This would mean that the saplings planted should already be of some height when planted out. The hedges should be on both sides of the paths, if the solar arrays are on both sides. Where the paths are at the edges of fields some hedges are already of this height on one side of some paths.	A Green Infrastructure Strategy [AS-005] has been developed for the Scheme which includes the reinforcement and enhancement of existing hedgerows, together with new hedgerow, tree and woodland planting. These measures are intended to provide visual filtering and screening where appropriate, whilst also strengthening the existing landscape framework and delivering wider biodiversity benefits.

ID	Theme	Representation	Applicant's Response
		The paths that will be affected by the scheme for the whole of its life have been checked and are tabulated at the end.	The Applicant acknowledges that proposed planting would progressively increase in effectiveness as it matures, resulting in a corresponding reduction in visual effects over time.
TRNA-004	Landscape and Visual Public Rights of Way	In the case of Tivetshall St Margaret FP8 on page 7 of the Environmental Statement Volume 3 Appendix 7.9, the promoters have made an error. FP 8 is on the Immediate south edge of the site 2A; the mature hedge and tree line are south of the footpath and do not protect walkers from a view of the panels. Hedge and tree planting will be required here between the path and the panels.	The Applicant notes that there is an error in the assumed location of Tivetshall St Margaret FP8 in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] . The respondent is correct that the footpath is located to the north of the tree line. The Applicant will be updating Tivetshall St Margaret FP8 in ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [APP-149] and review the mitigation design in the Green Infrastructure Strategy [AS-005] .
TRNA-005	Landscape and Visual Public Rights of Way	It is unclear if Tivetshall St Margaret FP2 is still to be affected by a sub-station being constructed over it as part of site 1, as shown in the original plans. It is not mentioned in the Environmental Statement Volume 3 Appendix 7.9. As shown in the original plans the path would probably have to be diverted round the perimeter of the sub-station.	The Applicant notes the query regarding Tivetshall St Margaret FP2. The Scheme would not result in a permanent diversion of Tivetshall St Margaret FP2. A temporary closure of Tivetshall St Margaret FP2 would, however, be required during the construction period, as set out in the Outline Public Right of Way and Permissive Paths Management Plan (Outline PRoWPPMP) [APP-203] . This closure would be temporary in nature

ID	Theme	Representation	Applicant's Response
			and would only remain in place for the duration of the relevant construction works. During the temporary closure, a signed diversion route would be provided via the B1134, Tivetshall St Margaret FP1 and Great Moulton RB19. Great Moulton RB19 would remain open throughout the construction period, although management measures may be implemented where necessary. Upon completion of the relevant construction works, Tivetshall St Margaret FP2 would be reopened. The temporary closure and diversion arrangements are illustrated on Sheet 19 of the Access and Public Rights of Way Plan [APP-011].
TRNA-006	Landscape and Visual Public Rights of Way	No comment has been made about paths affected by the cable route. It is assumed that there will be temporary closures necessary, and that the ground will be disturbed but hopefully restored. After a year or two there should be no reason why the paths should not be enjoyed as before.	Effects on PRow due to installation of the cable has been recorded as construction effect as part of the LVIA as presented in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043] and also in ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [APP-149]. Section 4.2 of the Outline PRowPPMP [APP-203] identifies the PRow impacted by the construction phase, categorising as short and medium term. No long-term closures are anticipated, as all existing

ID	Theme	Representation	Applicant's Response
			PRoW will reopen once construction in the respective area is complete.
TRNA-007	Public Rights of Way	Tabulation of sites, paths and preserving green views along the paths Sub-Site 7D • Saxlingham Nethergate FP12 – Needs hedge on north side. 750m needing protection • Saxlingham Nethergate FP13 – Needs hedge on southeast side. 350m needing protection • Saxlingham Nethergate FP14 – Needs hedge on east side. 250m needing protection. Sub-Site 7F • Saxlingham Nethergate FP10 – needs hedge to east. 525m needing protection • Saxlingham Nethergate FP9 – Need hedge to west and north. 625m needing protection	The Applicant has reviewed the recommendations summarised in the table opposite and provided a summary of the position of landscape mitigation measures proposed as shown on the Green Infrastructure Strategy [AS-005]. Sub-Site 7D • Saxlingham Nethergate FP12 – Hedgerow is proposed on north side • Saxlingham Nethergate FP13 – Hedgerow is proposed on south east side. • Saxlingham Nethergate FP14 – Hedgerow is proposed on east side. Sub-Site 7F • Saxlingham Nethergate FP10 – Hedgerow is proposed on east side. • Saxlingham Nethergate FP9 – Mitigated by woodland planning within existing hedgerow to the west of the PRoW • Saxlingham Nethergate FP11 – Hedgerow is proposed to north

ID	Theme	Representation	Applicant's Response
		- Saxlingham Nethergate FP11 – needs hedge to north. 150m needing protection - Saxlingham Nethergate FP27 – needs hedge on east side. 450m needing protection. Sub-Site 7E - Hempnall FP3 – needs hedge on east side. 400m needing protection - Hempnall FP4 – needs hedge on both sides as it crosses field. 700m needing protection - Hempnall FP5 – needs hedge mainly on west side, but on both sides in middle, then east side. 700m needing protection Sub-Site 7C - Hempnall BR30 – Probably OK. - Hempnall FP2 – South of D'Olyly's Grove needs hedge on east side (375m), north of D'Olyly's Grove needs	- Saxlingham Nethergate FP27 – Hedgerow is proposed to the north as this PRoW runs east to west. Sub-Site 7E - Hempnall FP3 – No mitigation proposed as the footpath traverses adjacent agricultural field - Hempnall FP4 – No mitigation proposed as the footpath traverses adjacent agricultural field - Hempnall FP5 – No mitigation proposed as the footpath traverses adjacent agricultural field Sub-Site 7C - Hempnall BR30 – the Applicant's notes comment that no mitigation is required. - Hempnall FP2 – Hedgerow is already proposed. Sub-Site 7L - Woodton u26469 Nobbs Lane – The Applicant notes comment that no mitigation is required.

ID	Theme	Representation	Applicant's Response
		hedge on both sides (2 x 275m). 925m needing protecting Sub-Site 7L - Woodton u26469 Nobbs Lane – Looks likely to have good hedge & trees on north side. Sub-Site 5B - Morningthorpe & Fritton FP11 – west hedge needed. 200m needing protection Site 5 - Morningthorpe & Fritton FP5 – Hedge on west side plus half of east side. 925m needing protection. - Morningthorpe & Fritton FP9 – Needs hedge to north. 300m needing protection Sub-Site 5A - Morningthorpe & Fritton RB4 – OK – Boylandhall Lane. Site 9	Sub-Site 5B - Morningthorpe & Fritton FP11 – Hedgerow is proposed on west side. Site 5 - Morningthorpe & Fritton FP5 – Hedgerow is proposed on west and east side. - Morningthorpe & Fritton FP9 – Retained farmland to the west does not require mitigation Sub-Site 5A - Morningthorpe & Fritton RB4 – the Applicant notes comment that no mitigation is required. Site 9 - Brooke FP6 – Hedgerow reinforcement is proposed to the east. No mitigation required to the west as land retained for agricultural use. Sub-Site 8B - Shotesham FP22 – Linear tree belt is proposed to the north.

ID	Theme	Representation	Applicant's Response
		- Brooke FP6 – Western hedge needed; eastern hedge needs strengthening. 650m needing protection. Sub-Site 8B - Shotesham FP22 – Hedge on north side for only 1/3rd length. 830m needing protection. Sub-Site 4B - Long Stratton FP3 – Needs hedge on one side or another, and allowing opposite hedge to grow to 2 metres. 1,050m needing protection - Long Stratton FP4 – Needs hedge on south side. 175m needing protection. Site 3 - Hempnall FP25 – Needs hedge on west side & allowing east hedge to grow 2 metres. 400m needing protection - Hempnall FP26 – Probably OK. Sub-Site 3B	Sub-Site 4B - Long Stratton FP3 – Hedgerow to be reinforced with trees to the west. East will be retained as agricultural fields, so no mitigation proposed. - Long Stratton FP4 – No mitigation proposed as the footpath traverses adjacent retained agricultural field Site 3 - Hempnall FP25 – No mitigation proposed to the west as field retained for agricultural use. Hedgerow already proposed to the east. - Hempnall FP26 – The Applicant notes comment that no mitigation is required. Sub-Site 3B - Hempnall FP28 – Linear tree belt is proposed to the south. Sub-Site 2A - Tivetshall St Margaret FP8 – The Applicant refers to its response to TRNA-004

ID	Theme	Representation	Applicant's Response
		- Hempnall FP28 – Needs hedge on both sides for 275m. 550m needing protection Sub-Site 2A - Tivetshall St Margaret FP8 – Needs hedge on north side. 600m needing protection. - Tivetshall St Margaret BR9, Prangle Lane – Needs hedge on east side. 350m needing protection Sub-Site 2B - Tivetshall St Margaret RB6 – Needs hedge on north side, south side hedge should be allowed to grow to 2m. 400m needing protection. - Wacton RB31 – Proposed tree planting maybe useful. Site 2 - Wacton FP43 – Looks like a reasonable hedge to the south. Site 1	- Tivetshall St Margaret BR9, Prangle Lane – Hedgerow is proposed on east side. Sub-Site 2B - Tivetshall St Margaret RB6 – Hedgerow is proposed on north side. - Wacton RB31 – Tree planting within existing hedge is proposed. Site 2 - Wacton FP43 – Linear tree belt is proposed to the south to improve screening. Site 1 - Tivetshall St Margaret FP2 – Substation is not located adjacent to this footpath. No mitigation is proposed. Refer to ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] for location of substations. BESS Site - Tivetshall St Margaret FP3 – Hedgerow is proposed on west side. Sub-Site 1B

ID	Theme	Representation	Applicant's Response
		- Tivetshall St Margaret FP2 – Query: Is site sill required as sub-station? BESS Site - Tivetshall St Margaret FP3 – Needs hedge & trees on west side nearly whole way along. 500m needing protection Sub-Site 1B - Great Moulton FP13 – Needs hedge on north side. 325m needing protection. - Great Moulton FP14 – Needs hedge on north side; plus gapping on south side. 275m needing protection Sub-Site 1A - Great Moulton FP15 – Needs hedge on south side plus 150m on north side at east end. 575m needing protection - Great Moulton RB19 – Proposed linear tree belts might suffice. Site 10	- Great Moulton FP13 – Hedgerow is proposed on north side. - Great Moulton FP14 – Hedgerows are proposed at this location. Sub-Site 1A - Great Moulton FP15 – Hedgerows are proposed at this location. - Great Moulton RB19 – Linear tree belt is proposed to the north and south of this route to improve screening. Site 10 - Woodton RB3, Pound Lane – The Applicant notes comment that no mitigation is required. - Woodton u76414, Wash Lane – The Applicant notes comment that no mitigation is required. As summarised in the Biodiversity Net Gain Statutory Metric [APP-219] the Scheme delivers 26,760m on new species rich hedgerow with trees, 8,620m of new species rich hedgerows, and 2,220m of native hedgerows.

ID	Theme	Representation	Applicant's Response
		• Woodton RB3, Pound Lane – Looks well hedged. • Woodton u76414, Wash Lane – Looks well hedged for much of length. Total hedge length required: 13,830m.	

6.12 UK Health Security Agency

Table 2.22 Applicant's Response to UK Health Security Agency [[RR-1980](#)]

ID	Theme	Representation	Applicant's Response
UKHSA-001	General remarks	Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We can confirm that:	The Applicant notes this comment.
UKHSA-002	Policy Compliance	With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 6 February 2025 have been addressed. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health.	The Applicant welcomes the representation from the UK Health Security Agency (UKHSA) and the Office for Health Improvement and Disparities (OHID) confirming that earlier comments raised on 6 February 2025 have been addressed, and that following review of the submitted documentation UKHSA and OHID are satisfied that the Scheme should not result in any significant adverse impact on public health. The Applicant notes that a Human Health Summary Statement is presented in ES Volume 1,

ID	Theme	Representation	Applicant's Response
			Chapter 18 – Other Environmental Matters (OEM) [APP-054] that provides a summary on human health, including effects from climate change, water environment, landscape and visual, transport and access, air quality, noise and vibration, socio-economics, agriculture, ground conditions and electromagnetic fields (EMF). It concludes that no residual significant adverse effects from the Scheme on population human health are anticipated at any stage of the Scheme following the implementation of mitigation. The Applicant further notes that the mitigation measures relevant to the protection of public health are secured through the suite of outline management plans, including the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198], which are secured through Requirements 13, 14 and 21 respectively of the Draft DCO [AS-032].
UKHSA-003	Policy Compliance	Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis we have chosen NOT to register an interest with	The Applicant acknowledges UKHSA and OHID's confirmation that they have chosen not to register an interest with the Planning Inspectorate on this occasion and welcomes the constructive engagement undertaken to date.

ID	Theme	Representation	Applicant's Response
		the Planning Inspectorate on this occasion.	

6.13 Waveney Valley Reform Group

Table 2.23 Applicant's Response to Waveney Valley Reform [\[RR-2005\]](#)

ID	Theme	Representation	Applicant's Response
WVR-001	Site Selection, Alternatives and Design Evolution Soils and Agriculture	This development is completely unsuitable for the area and will destroy a disproportionately large area of productive Norfolk countryside.	NPS EN-3 explains that the availability of grid connection, suitable irradiance levels, and local topography, among other factors, are factors in the consideration of site selection. The site selection process is described in the Site Selection Assessment [APP-215]. Factors considered in the site selection process include consideration of planning, environmental and operational factors in the search for suitable sites. These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3. Consideration has included both technical constraints (i.e. proximity to grid connection, site size, compatibility of land uses) and consideration of the avoidance and reduction of environmental impacts by excluding ecological, landscape and heritage designations. The Statement of Need [APP-206] provides evidence to support the suitability of the proposed location of the Scheme in relation to transmission network regional capacity, electricity networks, grid suitability and connection points. It

ID	Theme	Representation	Applicant's Response
			concludes that the location of the Scheme is well suited to support the UK's energy needs and that the proposed connection point is appropriate.
WVR-002	Site Selection, Alternatives and Design Evolution Statement of Need	It is not driven by a need to provide clean energy for Norfolk as the energy generated will be surplus to the counties already over burdened sustainable energy requirements and has been driven by the existing landholdings of the asset management company rather than the environmental suitability.	The Applicant notes the concerns about the reasons behind the Scheme. The Applicant's Statement of Need [APP-206] provides evidence that the Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. Section 4.3 of the Statement of Need [APP-206] explains that current levels of national electricity demand are expected to double (NPS EN-1, Para. 2.3.7) to electrify these non-traditional sectors. Regional electricity demand is likely to grow at a similar rate to national demand, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 (Clean Power 2030 Action Plan, Page 11). This underpins the need for the Scheme and for other schemes to come forward in the region to meet current and future electricity demand The Applicant is committed to meeting planning and environmental policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all

ID	Theme	Representation	Applicant's Response
			statutory and non-statutory bodies, ensuring quality and accountability throughout.
WVR-003	Community impact	It will have a devastating effect on several villages and the residents.	The Applicant has assessed the likely significant effects in the ES [APP-042 to APP-056] and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The design evolution of the Scheme, as summarised in the Design Approach Document [APP-212], has sought to avoid and/or reduce environmental impacts as far as practicable through the design process. Management and mitigation measures are secured through the various outline management plans [APP-196 to APP-205]. The management plans are secured via the Requirements contained within Schedule 2 to the Draft DCO [AS-032].
WVR-004	Water Environment Ecology and Biodiversity	It will destroy much of the unique biodiversity and hydrology in this part of Norfolk.	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

ID	Theme	Representation	Applicant's Response
			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 Outline OEMP [APP-197], the Outline DEMP [APP-198], the Outline LEMP [APP-199] and the Outline Protected Species Mitigation Strategy [APP-161]. The Biodiversity Net Gain Report [APP-218] demonstrates that the Scheme has the potential to deliver the following biodiversity net gain (BNG): • 37.42% gain for habitats; • 31.35% gain for hedgerows; and • 16.08% gain for watercourses. The Applicant has committed to a minimum 10% BNG through Requirement 9 of the Draft DCO. Flood (from all sources) and surface water risk has been considered in ES Volume 3, Appendix 9.1 - Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018 and AS-019], which identifies areas at risk of flooding, taking into consideration climate change. This concludes, no significant residual effects on the Water Environment are predicted during the construction

ID	Theme	Representation	Applicant's Response
			or decommissioning phases of the Scheme; and only beneficial effects during Operation.
WVR-005	Compulsory Acquisition	The infrastructure to service these facilities is inadequate at present and will require a massive upheaval to residents including having private homes and gardens compulsory purchased in order to upgrade.	Highway Works will support the safe movement of construction vehicles along narrower sections of the local road network and reduce potential disruption to the public highway. The Highway Works will contain localised improvements to deteriorated road edges or temporary highway and traffic works. Highway Works that have provisionally been identified where the AIL may overrun or oversail are identified in the Outline CTMP [APP-201], along with the likely and suitable access routes to the Scheme. Site access design, vehicle tracking and swept-path analysis has also been undertaken to assess the suitability of access as included in Appendix C of the Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]. Mitigation measures are also set out in the Outline CTMP [APP-201] to reduce, as far as practicable, the impacts of the Scheme on the local road network. In accordance with Requirement 15 of the Draft DCO [AS-032] a detailed CTMP will be submitted to and approved with the relevant planning authority that must consult with the relevant highway authority.

ID	Theme	Representation	Applicant's Response
			The Applicant's goal is to deliver the Scheme on land where the owner has voluntarily agreed to its use. Meaningful conversations have helped inform the design which in turn assists in avoiding people's land, including homes and gardens. As is standard in NSIP solar schemes, the Draft DCO [AS-032] includes provision for compulsory acquisition of land and rights. These powers sought are necessary and proportionate to ensure the deliverability of the Scheme.
WVR-006	Landscape and Visual	It will ultimately contribute to the industrialisation of rural South Norfolk.	A detailed landscape and visual assessment is reported in ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]. Further, a visual amenity assessment of PRoWs is presented in ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149] and on residential properties in ES Volume 3, Appendix 7.8 – Residential Visual Amenity Assessment [APP-148]. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of landscape and visual context is set out in the Design Approach Document [APP-212].

ID	Theme	Representation	Applicant's Response
			A Green Infrastructure Strategy [AS-005] has been developed which includes strengthening / reinforcing existing hedgerows (infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the Outline LEMP [APP-199] through a Requirement in the Draft DCO [AS-032]. Further mitigation measures relating to construction and decommissioning are secured in the Outline CEMP [APP-196] and Outline DEMP [APP-198], respectively via the Draft DCO [AS-032]. The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. It is considered by the Applicant for the reasons set out in the Planning Statement [APP-209] that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
WVR-007	Human Health Socio-Economics	This scheme is already causing a large amount of distress to residents and will result in a big reduction in quality of life	Mental health and wellbeing have been assessed within the Equality Impact Assessment [APP-

ID	Theme	Representation	Applicant's Response
		and physical and mental wellbeing to those leaving near or adjacent to the proposed facilities as well as financial loss to homes and businesses in the area.	214] and human health in ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054] . Mitigation measures to avoid and reduce environmental impacts have been embedded within the Scheme and are set out in the various management plans, including the Outline CEMP [APP-196] , Outline CTMP [APP-201] , Outline OEMP [APP-197] and Outline OTMP [APP-202] , Outline LEMP [APP-199] , Outline ESSC [APP-205] and Outline PRowPPMP [APP-203] .

6.14 Wood Green Residents Group

Table 2.24 Applicant's Response to Wood Green Residents Group [\[RR-2022\]](#)

ID	Theme	Representation	Applicant's Response
WGRG-001	General remarks	I wish to register an objection to the East Pye Solar scheme in South Norfolk on behalf of the Wood Green Residents Group (WGRG). The Group represents the specific interests of residents of Wood Green, a hamlet within the Long Stratton Town Council Area. Our objection is based on impacts on wildlife, landscape impacts and our lives in a quiet, rural hamlet.	The Applicant acknowledges this objection and has provided detailed responses to the concerns raised in this submission below.
WGRG-002	Landscape and Visual Ecology and Biodiversity	We have agreed that the scale of the impacts are not acceptable, and that the EPS scheme represents an unacceptable level of disruption to the people and wildlife of Wood Green.	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including designated sites for nature conservation, protected and notable habitats and species. The Outline CEMP [APP-196], the Outline OEMP [APP-197] and the Outline DEMP [APP-198] set out measures to protect habitats during construction, operation and decommissioning respectively. The ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] sets out the protection of species

ID	Theme	Representation	Applicant's Response
			afforded legislative protection, during the Construction Phase of the Scheme. Any disruption and disturbance to important ecological features has been considered and mitigation has been provided for all identified features whether this is simply avoidance through stand-off buffers, enhancing the habitat e.g. replacing narrow field boundaries with wider, species diverse habitats of a higher value or by providing specific species mitigation e.g. skylark mitigation strategy as outlined in the Outline LEMP (APP-199] The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-213] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059] have been applied to retain, protect and enhance ecological assets. They include for 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 wildlife. The NPS EN-1 recognises that any reduction in the scale of energy infrastructure, to mitigate adverse effects, may result in a significant operational constraint or reduction in function.

ID	Theme	Representation	Applicant's Response
			The Scheme has been designed to maximise the energy generation benefit from the available land and the grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects, as far as practicable. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.
WGRG-003	Statement of Need	We are not opposed to solar energy and support small-scale schemes that fit into the landscape and supplement family farm incomes. We note that the scheme is not needed under UK Government's Clean Energy Action Plan, and our view is that the impacts outweigh any benefits.	The Statement of Need [APP-206] sets out the government's policy position that there is a critical national priority for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms such as the Scheme. It also explains that the starting point for all assessments of applications for energy infrastructure types which are covered by the NPSs is that substantial weight is given to the need for such schemes (NPS EN-1, Paragraph. 4.2.19). Section 7.6 and Section 7.7 of the Statement of Need [APP-206] explain that the Scheme has been prioritised by NESO as part of their ongoing grid reforms. NESO have confirmed that the Scheme is included within the list of schemes

ID	Theme	Representation	Applicant's Response
			which have been prioritised to satisfy the current relevant regional capacity range to 2035 (i.e. without the Scheme, the national and regional capacity ranges would not be met). However, the Applicant notes that the Clean Power 2030 capacity ranges are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Paragraph. 3.2.6). This is because, as Section 4.3 of the Statement of Need [APP-206] explains, current levels of national electricity demand are expected to double to electrify transport and other non-electricity sector demand. Regional electricity demand is likely to grow at a similar rate to national electricity demand, underpinning Government's aim to prioritise new low carbon generation projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030. Section 7.3 of the Statement of Need [APP-206] sets out the challenge to deliver net zero regionally and underpins the need for the Scheme and for other schemes to come forward in the region and nationally to meet current and future electricity demand. Within this context of a clear national and regional need for the Scheme, it is clear that seeking to

ID	Theme	Representation	Applicant's Response
			maximise the benefits arising from the Scheme is aligned with the government's energy policy. The Applicant seeks to maximise the decarbonisation, energy security and affordability benefits arising from the Scheme from available and suitable land and through its contracted grid connection. Paragraph 4.1.7 of NPS EN-1 states that <i>'for projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional cases.'</i> The Applicant notes the support for smaller scale schemes expressed in this representation. Section 6.3 of the Statement of Need [APP-206] explains that smaller schemes can make a valuable contribution to meeting demand. Para. 3.3.12 of NPS EN-1 demonstrates the government's view that smaller schemes are needed alongside, but not instead of, large-scale ground mount solar schemes. This is because the bulk generation potential of large-scale schemes and their connection to the National Electricity Transmission System (NETS) enables their benefits to be felt more widely.

ID	Theme	Representation	Applicant's Response
			The Applicant's position on the planning balance is set out within the Planning Statement [APP-209] that adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.
WGRG-004	Transport and Access	TRAFFIC Weight limit and increased HGV use of Hall Lane bridge; this is a bridge with a weight limit below that needed by the vehicles proposed by East Pye. The visibility is poor, especially for cyclists and several of us at Wood Green use this route to walk or cycle to work, public transport or shops. Immediately after the bridge, the road narrows and enters a series of bends. It is not suitable for increased HGVs and construction traffic.	The Applicant notes the concern regarding the suitability of Hall Lane bridge for construction traffic and the potential impacts on other road users. The Applicant confirms that Hall Lane would be used for Abnormal Indivisible Loads (AILs) only and would not form a route for general construction HGVs or LGVs. As such, vehicle movements on this route would be limited in frequency. The Applicant has liaised with Norfolk County Council regarding the suitability of Hall Lane Overbridge for the proposed AIL movements. Norfolk County Council has confirmed that the bridge is capable of accommodating the size and weight of the vehicles proposed to use this route. As such, the bridge is considered suitable for the proposed AIL movements. In addition, Drawing 333101678-STN-HGN-XX-DR-TR-5500 Sheet 50 demonstrates through swept path analysis that the proposed AIL vehicles can travel along Hall Lane and access the site with minimal overhang. This is provided in Appendix C

ID	Theme	Representation	Applicant's Response
			of the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]. To accommodate these AIL movements, temporary mitigation measures, such as restricting movements to be outside peak hours, notification processes for residents, and engagement with the police and relevant authorities, would be required at certain locations along the route. Land at Hall Lane that may be required for these measures is identified on Sheet 15 of the Works Plans Part 2 [AS-003]. Further details of the works required to facilitate AIL movements are provided in Section 6.3 of the Outline CTMP [APP-201]. The management of AIL movements is also set out in Section 6.4 of the Outline CTMP [APP-201], which includes measures to ensure that these vehicles can be safely accommodated on the highway network when movements take place.
WGRG-005	Transport and Access	Both the Hall Lane bridge and the nearby small lanes are our only access routes to vital services. Disrupting these narrow roads will cause chaos for local residents and this comes with the cumulative impact of nearly 2 years of disruption caused by the construction of the Long Stratton bypass. Although the	The Applicant notes the concern regarding the potential effects of construction traffic on Hall Lane and surrounding local roads, and the cumulative effects of other recent and committed infrastructure projects in the area. With regard to the use of Hall Lane, please refer to the Applicant's response to Representation WGRG-004.

ID	Theme	Representation	Applicant's Response
		population is low, these lanes are our lifeline and impacting this by increasing large traffic on these tiny, bendy lanes is not acceptable. During the construction of the bypass, we faced detours to access services, adding to a rise in car journeys and carbon emissions. The construction of EPS will do the same, as our main access routes are all scheduled for disruption.	Construction traffic associated with the Scheme would be managed in accordance with the Outline CTMP [APP-201] , which includes measures such as delivery scheduling and monitoring systems, temporary traffic management measures and other route-specific mitigation where required to minimise potential conflicts and disruption on the local highway network.
WGRG-006	Transport and Access	Disruption on Parker's Lane. One of the cable/haul routes crosses Parker's Lane. This is the only access for houses on the north side of Wood Green and the emergency access for others in the hamlet. Ambulances, police and fire all tend to access using Parker's Lane – although this is not an adopted road, it is a quicker route from Hall Lane to the houses on the south of Wood Green.	The Applicant notes the concern regarding potential disruption on Parker's Lane. Construction traffic associated with the Scheme would not route along Parker's Lane. Rather, Parker's Lane would only be crossed during construction of the cable route corridor. Construction vehicle route descriptions are detailed within the ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 – APP-177]. The construction works associated with the cable route crossing would be temporary and short-term in nature, rather than throughout the wider construction period. As such, Parker's Lane would not be subject to regular construction traffic movements associated with the Scheme. Any works affecting Parker's Lane would be managed in accordance with the relevant construction management measures as detailed

ID	Theme	Representation	Applicant's Response
			within the Outline CTMP [APP-201] , with appropriate traffic management implemented where required to maintain access and minimise disruption. Accordingly, the Applicant does not anticipate significant effects on access for residents or emergency services associated with the cable route crossing.
WGRG-007	Transport and Access Lighting Noise and Vibration	Noise, lighting and dust from haul road being proposed on north side of Wood Green and parallel to Parker's Lane, between us and bypass. This is close to houses, including listed buildings. Wood Green is an exceptionally quiet hamlet, visited by many for its tranquil open space; 3 years of construction traffic close to the village is unacceptable.	The Applicant notes the concern regarding potential noise, lighting and dust effects associated with construction activities in the vicinity of Wood Green. The Applicant notes that the Scheme does not include a haul road adjacent to Wood Green. The element of the Scheme located in the vicinity of Wood Green comprises the Cable Route Corridor (CRC). While construction vehicles may travel internally within the CRC during its construction, the route would not be used to facilitate vehicle movements between solar farm site parcels. Although the overall construction programme is anticipated to extend over a 24-month period, works associated with the CRC in the vicinity of Wood Green would only occur during the relevant phase of the construction programme and would not take place throughout the full construction period. Accordingly, construction activity in this location would be temporary and of substantially

ID	Theme	Representation	Applicant's Response
			shorter duration than the overall construction programme. Construction activities would be managed in accordance with the Outline CTMP [APP-201], which includes measures to minimise impacts on the local area. These measures include the provision of wheel cleaning facilities, where required, to reduce the transfer of mud and debris onto the public highway, together with other construction management measures designed to minimise disruption during the construction period.
WGRG-008	Transport and Access	Increased traffic accessing the compounds on Hall Lane (our main access route), which is located on a double bend with poor visibility. This is an extremely dangerous location and can only be accessed by narrow lanes.	The Applicant notes the concern regarding increased traffic accessing the compounds on Hall Lane. Please refer to the Applicant's responses to Representations WGRG-004 and WGRG-005, which set out the assessment of Hall Lane and Hall Lane Overbridge, including the suitability of the proposed route, swept path analysis undertaken for the proposed vehicles, and the mitigation measures proposed to manage movements and maintain highway safety during the construction period.
WGRG-009	Ecology and Biodiversity	The current ecology surveys provided by EPS are not complete enough to allow a full examination and further surveys are essential. There also seems to be a mismatch of evidence between where haul roads, compounds and the	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including designated sites for nature conservation, protected and notable habitats and species. The Ecology and Biodiversity Chapter has

ID	Theme	Representation	Applicant's Response
		widening of narrow lanes will occur and estimates of the impact on mature hedges and trees.	been underpinned by extensive baseline ecological survey for habitats and species following industry standard survey effort, as detailed within ES Volume 3, Appendices 8.1 – 8.9 [APP-152 - APP-160] , the scope of which has also been agreed through the scoping and consultation process, as described in Section 8.2 of ES Volume 1, Chapter 8 -Ecology and Biodiversity [APP-044] .
WGRG-010	Ecology and Biodiversity	Wood Green is a County Wildlife Site (CWS) and is connected, via hedges and Roadside Nature Reserves to CWS at Crow Green and Tyrell's Wood, and to the Site of Special Scientific Interest at Tyrell's Wood and Fritton Common. EPS represents a significant change to this landscape and its habitats by causing disruption and increasing fragmentation of sites, none of which can be adequately mitigated for.	The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including the statutory and non-statutory designated sites for nature conservation identified. This includes in relation to habitat fragmentation and loss. Furthermore, whilst there is no legislative requirement for the Scheme to provide quantifiable Biodiversity Net Gain (BNG), the Applicant has sought to embed BNG into the Scheme design from the early optioneering stages through to submission. Requirement 9 of the Draft DCO secures a commitment to a minimum of 10% BNG. A detailed approach is provided within the Biodiversity Net Gain Report [APP-218] which discusses the Schemes adherence to the biodiversity gain hierarchy, and habitat baseline values and post-construction values are calculated

ID	Theme	Representation	Applicant's Response
			and provided within the Biodiversity Net Gain Statutory Metric [APP-219] .
WGRG-011	Lighting Ecology and Biodiversity	Lighting of compounds and construction sites, trenching works and increased vehicle movements, especially of heavy vehicles are my particular concerns here and, in the case of this application, are spread across a wide swathe of the area.	The Outline CEMP [APP-196], the Outline OEMP [APP-197] and the Outline DEMP [APP-198] set out measures to protect habitats during construction, operation and decommissioning respectively. The ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] sets out the protection of species afforded legislative protection, during the Construction Phase of the Scheme. Lighting will be required during construction for safety reasons but will be temporary in nature and predominantly limited to the core working hours. Lighting is generally not required within the Sites during the Operational Phase of the Scheme, with all external lighting switched off. Lighting will only be activated during scheduled maintenance, in emergency situations or for security purposes. Lighting will be directed away from woodland / hedgerows. All routine maintenance activities would be scheduled for daylight hours as far as is practicable, and therefore it is anticipated that focussed task specific lighting should only be required in the event of emergency works / equipment failure requiring night-time working or panel cleaning operations. Motion sensing security lighting would be provided within Project

ID	Theme	Representation	Applicant's Response
			Substations, the National Grid Substation and within the BESS Compound to be used to maintain safe working conditions in winter months, for security purposes, and for maintenance activities. These will be positioned and angled to focus on human or vehicular movement.
WGRG-012	Ecology and Biodiversity	Wood Green supports breeding bats, great crested newts, water vole and a range of breeding birds including yellowhammer, bullfinch, song thrush, reed warbler, reed bunting and linnets. Turtle also breed here most years and we host one of the largest winter starling murmurations in Norfolk – this appeared to be disrupted by the Long Stratton Bypass construction and we are concerned that the EPS construction would have the same impact.	ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological features including the protected and notable species identified, including in relation to construction and decommissioning phase impacts. The Outline CEMP [APP-196] and the Outline DEMP [APP-198] set out measures to protect habitats during construction and decommissioning respectively. The ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161] sets out the protection of species afforded legislative protection, during the Construction Phase of the Scheme.
WGRG-013	Ecology and Biodiversity	Wood Green is also used for foraging by barbastelle bats, being within the Core Sustenance Zone of a number of interconnecting colonies (Norfolk Barbastelle Study Group). Barbastelles are especially prone to disruption from noise and lighting, and, as it stands, the proposal gives grave concern for the	The Applicant acknowledges the presence of barbastelle bat colonies surrounding the Order Limits and has considered the core sustenance zone within ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]. The Scheme design primarily utilises intensively managed farmland habitats, of sub-optimal value

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		bats' future in the landscape should it proceed. A Natural England license will be needed for work in the vicinity of the barbastelle roosts identified by the Norfolk Barbastelle Study Group, and this is not clear in the application as it stands.	for foraging/commuting bat species. These habitats are subject to regular ploughing, tilthing, harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including barbastelle bat maternity roosts). Therefore, land utilised for the Scheme is currently subject to regular disturbance, with the proposals considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-7.18] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059], include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including barbastelle bats.

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			It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for a European Protected Species Mitigation Licence for barbastelle bats, and that the Scheme will not result in significantly increased disturbance which would: <i>(a) [to] impair their ability—</i> <i>to survive, to breed or reproduce, or to rear or nurture their young; or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or</i> <i>(b) [to] affect significantly the local distribution or abundance of the species to which they belong.</i>
WGRG-014	Ecology and Biodiversity	The crossing point at Parker's Lane will damage a designated Roadside Nature Reserve (RNR). Lowland meadow is an irreplaceable habitat, which has suffered a catastrophic loss in the Claylands since World War 2. (Countryside Commission figures, 1984, but this loss at nearly 98%). All lanes that will be widened need a full botanical and hedge survey.	An extended habitat survey (UKHab methodology) has been undertaken as reported in ES Volume 3, Appendix 8.1 - Ecological Desk Study and Extended Habitat Survey [APP-152]. This records the findings of a desk-based study and the detailed survey and mapping of habitats (including grassland and hedgerow habitats) identified within the Order Limits. During this extended habitat survey, there was no evidence to suggest that further targeted botanical surveys are required. The ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044] includes assessment of the Scheme on important ecological

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			features including designated sites for nature conservation (including the Parkers Lane Roadside Nature Reserve (RNR)) and habitats.
WGRG-015	Ecology and Biodiversity Water Environment	We also note concerns about impacts on water quality on the Hempnall Beck and River Tas, a chalk stream.	Embedded mitigation for the management of pollution risk to receptors (including the Hempnall Beck and River Tas) (leaks/spills/contaminants in surface water runoff) for all phases of the Scheme is secured within the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]. The surface water drainage strategy for the BESS, National Grid and Project Substations incorporates a system lined with an impermeable membrane to prevent the infiltration of runoff to the strata beneath in these areas. The detailed surface water drainage design is secured through DCO Requirement 11. In addition, The Outline Cable Route Construction Statement [APP-216] commits to trenchless crossing techniques at sensitive watercourse crossings, including the River Tas, with launch and reception pits located outside defined Avoidance Areas. Cables beneath main rivers will be installed at a minimum depth of 5 m below the surveyed riverbed. Therefore, these embedded mitigation measures and design commitments incorporated within the

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			Scheme are sufficient to avoid significant effects on the water quality of the River Tas.
WGRG-016	Landscape and Visual	LANDSCAPE, ACCESS AND FARMING The following document sets out the high value of the Claylands landscape. As the leading landscape historian Oliver Rackham pointed out, this is a small-scale area of ancient countryside, with pre-enclosure patterns of tall, old hedges, small woods and irregular fields. EPS is out of scale with this intimate landscape and represents the industrialisation of a very rural area. Re-arranging this highly valued landscape at pace and to suit an ephemeral business is not acceptable.	The Applicant notes the comment on the Claylands landscape. A detailed landscape and visual assessment are reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043], and this considers effects NCA 83: South Norfolk and High Suffolk Claylands. The value of the landscape is acknowledged and the impact of the Scheme on the landscape character is assessed. The Applicant is also aware of the Norfolk Claylands Wilder Connections project led by Norfolk Wildlife Trust which has been considered as guidance in developing the embedded design principles adopted and detailed within the Design Principles, Parameters and Commitments [APP-7.18] and illustrated on ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]. Landscape measures include the retention and enhancement of field boundary features and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including barbastelle bats. The NPS EN-1 recognises that any reduction in the scale of energy infrastructure, to mitigate adverse

ID	Theme	Representation	Applicant's Response
			effects, may result in a significant operational constraint or reduction in function. The Scheme has been designed to maximise the energy generation benefit from the available land and the grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects, as far as practicable. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.
WGRG-017	Lighting	Lighting on compounds and from night working will have a significant impact on tourism as we wish this Dark Skies area. Dark skies areas are shown to have benefits for human health as well as for wildlife Darkness for Well-Being DarkSky International and Wood Green attracts visitors who come to star gaze because of the Dark Skies	The Applicant addressed this comment with regards to lighting in GMAC-165.
WGRG-018	Public Rights of Way	Wood Green is crossed by the Boudicca Way long distance footpath and is used for walking, cycling and horse riding, with many people locally having limited access to open space, but benefitting	The Applicant notes the importance and value of Wood Green to the wider population and as a green open space. The effect on the landscape and visual receptors during the construction phase

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	Transport and Access	greatly from the network of footpaths and quiet lanes. Wood Green functions as an important open space for the people of Long Stratton and during the planning of the bypass, we fought hard to preserve this. Many of the quiet lanes are also used by non-car users, including for walking, cycling and riding. Heavy construction vehicles and increased traffic on these lanes adds innumerable hazards for these users.	are reported in ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]. As stated within Section 4.4 of the Outline Public Rights of Way and Permissive Paths Management Plan [APP-203], a limited extent of the Boudicca Way promoted walking route intersects with the Order Limits. Should a temporary closure be required at this section, it will be of such limited duration that no diversion of the route is considered necessary.
WGRG-019	Cultural Heritage	The setting of listed buildings at Wood Green will also be impacted.	The Applicant notes that the hamlet of Wood Green lies c. 300m south and c. 260m east of the Cable Route Corridor. As noted within ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 - APP-168], only designated heritage assets within a certain distance of the Cable Route Corridor were included for assessment, due to the scale of potential effects arising from construction and decommissioning activities within the Cable Route Corridor which, by their nature, will result in a minimal impact to built-heritage assets during the construction phase, and will be inherently temporary and short term. The Applicant notes that all five Grade II Listed Buildings within the hamlet of Wood Green were not included for assessment due to their distance

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			from the Cable Route Corridor and nature of the proposals within the area.
WGRG-020	Battery safety	OTHER OBJECTIONS We note that the Norfolk fire service opposes the BESS at Carpenter's Farm due to fire risk. This site is on a prevailing wind from us, so would impact us in case of fire.	The Applicant has submitted an Outline BSMP [APP-200] which has been prepared for the Scheme using guidance from Norfolk Fire and Rescue Service (NFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The Outline BSMP [APP-200] fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. The safety objectives for the design of the BESS site are listed in Section 1.4 of the Outline BSMP [APP-200]. Section 1.4.2 of the Outline BSMP [APP-200] stipulates: <i>"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. NFRS intervention</i>

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			<i>in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> <i>To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i> <i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite.”</i> The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in the Outline BSMP [APP-200] Appendix B: Battery Energy Storage System (BESS) Fire – Emissions to Air Risk Assessment) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements, the selected gases are representative of emissions recorded from a range of LFP battery systems

ID	Theme	Representation	Applicant's Response
			integrated in current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and conclude that the <i>"proposed development should not result in any significant adverse impact on public health."</i> The Plume Study in Appendix B assesses the battery fire emission impacts on air quality at six worst case fire locations (using the illustrative BESS design in Appendix A) on sensitive receptors within a 1km radius of the BESS Site. The study includes all receptors within a 1km radius regardless of the prevailing wind direction i.e. it assumes a smoke plume will impact all receptors within that radius. Typically, a BESS fire would be a relatively short-term incident. The Plume Study therefore compared predicted concentrations against Acute Exposure Guidance Levels (AEGs) and Emergency Response Planning Guidelines (ERPGs) which are relevant to short term releases, in addition to National Air Quality Objectives (NAQOs). Based on the factors of distance to the nearest property and the anticipated short-term nature of a fire incident, the assessment in Appendix B concludes that there will not be adverse effects at the closest residential receptor locations because of a BESS fire incident.

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			To validate the final BESS site design, the Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 4.5.13 of the Outline BSMP [APP-200] and secured through the DCO: <i>"at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."</i> Section 2 of the Outline BSMP [APP-200] documents the Applicant's consultation with NFRS and Section 4 of the oBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance.

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			NFRS are a statutory consultee for the Scheme and Section 2.1.5 of the Outline BSMP [APP-200] states: <i>"The Applicant has complied with NFCC guidelines (Ref 1) and engaged with NFRS during the pre-application stage and will ensure that the BSMP accounts for any subsequent revisions made to NFCC guidelines. Close consultation will continue with NFRS post-consent, should the Scheme be granted consent."</i> The Outline BSMP [APP-200] is secured through a requirement in Schedule 2 of the Draft DCO [AS-032]. This stipulates that a detailed Battery Safety Management Plan (BSMP) is to be submitted to and approved by the relevant planning authority in consultation with NFRS, the Environment Agency, prior to the commencement of the works for the BESS. The BSMP will be substantially in accordance with the Outline BSMP [APP-200].
WGRG-021	Noise and Vibration	We also note that BESS sites have a constant humming noise, which will cause further noise pollution in a quiet landscape.	The operational noise assessment and commitments consider noise impact at relevant receptor locations, including PRowS and dwellings. The following commitments are included in the Outline OEMP [APP-197]: Noise from the BESS will achieve the predicted sound levels in ES Volume 1,

ID	Theme	Representation	Applicant's Response
			Chapter 12 – Noise and Vibration [APP-048]. • The rating level from other elements will not exceed the background sound level at other residential receptors. • Specific sound levels on PRowS will not exceed 55 dBA. The commitments demonstrate that significant adverse effects will be avoided and that adverse effects will be mitigated and minimised.
WGRG-022	Soils and Agriculture	We are also concerned about the long-term damage to good quality agricultural land and damage to farm businesses facing compulsory purchase of their land. We see this as putting one large business above many small local ones and above the need for food security in an increasingly unstable, volatile world. Having looked at the area this spring, we note that the fields where panels are proposed include potatoes, cereal crops, oil seed rape and sugar/fodder beet; in previous years they have also included peas as part of the rotation. This is prime food growing land and should not be lost, possibly for many decades to come if not forever, to solar	The concern is noted. The ES Volume 1 Chapter 15 – Soils and Agricultural Land [APP-051] includes a detailed assessment of the cropping and stocking across the Site, and the effects of the Scheme on both the individual farms and the wider land-based rural economy.

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		energy that is not essential to the UK energy supply.	
WGRG-023	Compulsory Acquisition	We note that farmers are being given no choice over the cable route compulsory purchase, which will disrupt their operations over several years, making areas of their farms unusable and other areas hard to access. Family farms are hard work, often with profit margins that are slim, especially in tough years or poor weather. The compensation covers only the corridor lost to haul roads and trenching – it does not cover the added time of accessing land cut off by the construction zone and the problem of farming smaller, divided fields. This is unacceptable in these times when food security needs to be at the heart of national policy.	The effects of the construction of the Cable Route Corridor (CRC) on agricultural businesses through restricted access, temporary field severance and disruption to normal farming operations have been assessed in Section 15.8 in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]. The Applicant has sought, as far as reasonably practicable, to minimise impacts on agricultural holdings through the design and routing of the CRC whilst maintaining a viable connection to the grid. The construction effects associated with cable installation are temporary in nature and, following installation, the cable trenches would be backfilled and land reinstated. Agricultural land would therefore remain available for farming following construction above the buried cables. The Applicant acknowledges that temporary severance of fields and changes to normal working practices may occur during construction. However, construction methodologies have been developed to minimise these effects where reasonably practicable. This includes ongoing engagement with affected landowners and occupiers regarding access arrangements, the provision of crossing

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			points where necessary, and detailed construction planning to reduce disruption to agricultural operations in advance of construction works. Mitigation measures relating to soil handling, land reinstatement and agricultural land protection are set out in section 4 of the Outline Soil Resource and Management Plan [APP-204]. Requirement 18 in Schedule 2 to the Draft DCO [AS-032] provides that no part of the authorised development may commence until a soil resource and management plan for that part has been submitted to and approved by the relevant planning authority. Any soil resource and management plan submitted in accordance with Requirement 18 must be substantially in accordance with the Outline SRMP. The justification for the need to seek compulsory acquisition powers is set out in the Statement of Reasons [APP-020]. The Applicant can confirm that compensation is not limited solely to the area occupied by haul roads or trenching works. The statutory compensation framework provides mechanisms for assessing compensation claims arising from the exercise of compulsory acquisition powers and temporary possession, including disturbance and other compensatable losses where applicable.

ID	Theme	Representation	Applicant's Response
			The Applicant does not consider that the cable route corridor would result in significant adverse effects on the long-term viability of affected agricultural businesses or materially prejudice the continued agricultural use of the land. The Applicant therefore considers that the impact on agricultural production and food security would be temporary and localised rather than permanent. Additionally, ES Chapter 15 – Soils and Agricultural Land [APP-051] highlights that the Government's analysis shows that food self-sufficiency is stable and slightly improving, and that there is no cause for concern and food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that climate and nature crisis poses the greatest long-term risk to food security, a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.
WGRG-024	Planning Policy	The EPS scheme opens doors to other solar farm projects in the Claylands; with this in mind, it must be judged on its potential to create more impacts spread over a wider area.	The Applicant notes this comment. The Applicant is aware of other projects in the region. The technical chapters of ES Volume 1 [APP-042 to APP-054] presents an assessment of the cumulative effects of multiple existing and/or

ID	Theme	Representation	Applicant's Response
			approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. Any other development proposals that come forward in the future, will need to be considered on their merits by the relevant determining authority. If necessary any authority will need to take into account cumulative impacts (including in combination with East Pye if relevant) prior to determining any application. The Statement of Need [APP-206] explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region. The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders. The Applicant will be submitting a DCO Interrelationship Report into the Examination.