East Pye Solar

The Applicant's Response to Relevant Representations Part 4: Parish and Town Councils, and Parish Meetings

September 2026

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1 Introduction

1.1 Purpose of the Document

1.1.1 An Application (the Application) was made to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under Section 37 of the Planning Act 2008 (PA 2008) for East Pye Solar (The Scheme). The Application was submitted by East Pye Solar Limited (the Applicant) on 5 March 2026 and was accepted for Examination on 2 April 2026.

1.1.2 The period for registering as an Interested Party through the submission of a Relevant Representation (RR) ran from Wednesday 29 April 2026 to Wednesday 10 June 2026. The Planning Inspectorate (PINS) has published a total of 2,033 RRs submitted to the Examining Authority by Interested Parties relating to the Application for the Scheme. These were published on the PINS website on Wednesday 1 and Thursday 2 July 2026.

1.1.3 This document provides the Applicant's response to the RRs submitted by parish and town councils, and parish meetings. No Members of Parliament submitted RRs to the Planning Inspectorate.

1.1.4 It forms part of the Applicant's response to RRs submitted. The Applicant has submitted its response to RRs submitted by other Interested Parties in the following documents at Procedural Deadline A (1 September 2026):

- **Applicant's Response to Relevant Representations Part 1: Host and Neighbouring Local Authorities [EN0110014/EXAM/8.6]**;
- **Applicant's Response to Relevant Representations Part 2: Statutory Consultees, Undertakers and Notable Parties with whom the Applicant is seeking a Statement of Common Ground [EN0110014/EXAM/8.7]**;
- **Applicant's Response to Relevant Representations Part 3: Other Statutory Consultees, Undertakers and Notable Parties [EN0110014/EXAM/8.8]**; and
- **Applicant's Response to Relevant Representations Part 5: By Theme [EN0110014/EXAM/8.10]**.

1.2 Structure of the Report

1.2.1 This document provides a response from the Applicant to the matters raised in the RR and is structured as follows:

- **Table 1.1** sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred

to by the Applicant in responding to RRs. The wider range of acronyms used by the Applicant can be found in the **Contents, Glossary and Abbreviations [APP-036].**

- **Table 1.2** lists the town councils, parish councils, parish meetings and Members of Parliament that have submitted RRs. A link to the Relevant Representation submission made by each party is linked. Each submission can be found within the Relevant Representation Library (published on 6 July 2026). These submissions are presented and responded to in **Section 2** of this document.

1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the PINS' East Pye Solar Examination Library.

1.2.3 All documents submitted to the Planning Inspectorate on 5 March 2026 carrying '/APP/' within their document reference. Submissions made to the Planning Inspectorate post-submission and during the pre-examination stage carry '/AS/' instead of '/APP/' within the document reference, to reflect the submission being during the pre-examination stage.

Table 1.1 List of Acronyms of Submission Documents

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

Reference	Submission Document
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 Parish and Town Councils, and Parish Meetings whose Relevant Representations are Responded to in this document

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
RR-0059	AYPC	N/A	Alpington with Yelverton Parish Council
RR-0191	BAPC	N/A	Bergh Apton Parish Council
RR-1079	BePM	N/A	Bedingham Parish Meeting
RR-0216 RR-0217	BPC	N/A	Brooke Parish Council
RR-0606	FPC	N/A	Forncett Parish Council
RR-0707	GMPC	N/A	Great Moulton Parish Council
RR-0740	HPM	N/A	Hedenham Parish Meeting
RR-0760	HPC	N/A	Hempnall Parish Council
RR-1094	KPM	N/A	Kirstead Parish Meeting
RR-1165	LSTC	N/A	Long Stratton Town Council
RR-1373	MFPC	N/A	Morningthorpe and Fritton Parish Council
RR-1745	SNPC	03-001, 03-002	Saxlingham Nethergate Parish Council
RR-1748	SePC	N/A	Seething Parish Council
RR-1761	SHPC	N/A	Shelton and Hardwick Parish Council
RR-1771	SPC	N/A	Shotesham Parish Council
RR-1915	THPC	N/A	Tharston and Hapton Parish Council
RR-1937	TiPC	N/A	Tibenham Parish Council
RR-1951	TPC	N/A	Tivetshall Parish Council
RR-1960	ToPC	N/A	Topcroft Parish Council
RR-2004	WPC	N/A	Wacton Parish Council

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation
RR_2023	WoPC	N/A	Woodton Parish Council

2 The Applicant's Response to Parish and Town Councils, and Parish Meetings

2.1 Alpington Parish Council

Table 2.1 Applicant's Response to Alpington with Yelverton Parish Council [RR-0059]

ID	Theme	Representation	Applicant's Response
AYPC-001	Soils and Agriculture	86% of the proposed land for this scheme is best and most versatile agricultural land and should be protected for food production. It's not only the areas that will be used for the solar panels, substations and BESS but the amount of land that will be used for the Cable Route Corridors. Although we are advised that the Cable Route Corridor will be a maximum of 50m wide whilst it's under construction the land in which it is situated will be out of use for farming purposes.	The Applicant has demonstrated that based on the ALC surveys undertaken to date for the Order Limits of the Scheme, it contains 68.4% BMV land as set out in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] -** not 86%. Paragraph 15.5.7 of **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** states, in respect of the Cable Route Corridor (CRC): *'The CRC works are short-term and temporary, and farm disruption will be short-term and temporary as a consequence.'* 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.

ID	Theme	Representation	Applicant's Response
			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 instead of, rooftop solar. The likely effect of the Scheme on food production and on the wider economy has been assessed as not significant. The area on farms in Norfolk is about 417,633ha (**ES Volume 1, Chapter 15 – Soils and Agricultural Land, Table 15.9 [APP-051]**). Currently over 41,000ha of arable land (10.8% of agricultural land and 15.1% of all arable land) is not being cropped. Under the Predictive ALC Map for England (Defra, on-line since May 2026) it is the Applicant's estimate (statistical analysis has not been published for authority boundaries) that over 90% of agricultural land across Norfolk is predicted to be BMV, so a high proportion of uncropped land will be BMV. The effect on food production and the related rural economy, with or without continued agricultural production from sheep grazing, is not significant.

ID	Theme	Representation	Applicant's Response
AYPC-002	Transport and Access	Old Hall Farm Woodton is one such business. The proposed Site 10 would mean that access to half of their fields will be impossible for as long as it takes to lay the cables.	The Applicant has met with the Respondent on site to understand their farm and business and will continue to engage with landowners throughout the development process and work closely with them to understand their operational requirements and minimise disruption wherever temporary works are required This, includes making appropriate provision to maintain normal farming activities where possible. As part of this engagement, our agents have been working with landowners and their agents along the cable route corridor to understand any specific concerns or operational requirements relating to their farming practices and to explore practical solutions, which may include fencing, crossing points and the provision of water supplies where land may be temporarily severed by the works. Any temporary direct physical loss as a result of the works would be addressed through the statutory compensation framework.
AYPC-003	Electromagnetic Fields	There are also concerns that the herd of Jersey cows will be disrupted by the voltage running under the ground once the cables are laid.	The Applicant has used measured data, including maximum field strengths associated with the underground cables, to undertake the technical assessment of **ES Volume 1, Chapter 17 - Electromagnetic Fields [APP-053]** in the interest of human health. As the field strengths are deemed

ID	Theme	Representation	Applicant's Response
			safe for human exposure, it can be concluded that this is also true for wildlife.
AYPC-004	Socio-Economics Ecology and Biodiversity	The proposed site 10 will cause disruption and harm to this local business as well as causing biodiversity loss including the destruction of habitat for Skylarks and Lapwings.	The Applicant refers to the response provided to AYPC-002. An assessment of breeding birds is provided in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**. With the exception of skylarks, it was agreed with the Planning Inspectorate (**ES Volume 3, Appendix 2.2 – EIA Scoping Opinion [APP-114]**) to scope out impacts on breeding birds during the operational of the Scheme. Measures to avoid impacts on skylark and other ground nesting birds are included in **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]** and consideration of breeding birds in the long-term management of the green infrastructure of the Scheme is included in the **Outline LEMP [APP-199]**. In accordance with these, a Protected Species Mitigation Strategy and a detailed LEMP will be submitted to and approved by the relevant planning authority in line with Requirement 8 and Requirement 7, respectively, of the **Draft DCO [AS-032]**.
AYPC-005	Compulsory Acquisition	Some residents in Hempnall, Tasburgh and Saxlingham have been sent letters from Island Green Energy saying that	The Applicant acknowledges that the wording in letters sent to landowners and properties containing the LIQs may have caused concern and

ID	Theme	Representation	Applicant's Response
		their properties may be subject to Compulsory Purchase Orders. Whether this will be necessary if the project is approved remains to be seen, but this will be a source of great concern for these people and also blight the local property market.	confusion. The Applicant provided further information regarding this process in a letter to properties on 24 July 2025. This letter reassured landowners that the Applicant does not intend to seek compulsory acquisition powers for any homes, gardens and buildings and that this has never formed part of the proposal. The Applicant is committed to engaging with landowners in an open, transparent and respectful way. As part of the DCO process, the Applicant is legally required to identify anyone who may have land that could be affected by the Scheme. 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 proposed scheme such as noise and vibration. However there is no statutory compensation for loss of value due to visual impacts or diminished views and 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

ID	Theme	Representation	Applicant's Response
			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.
AYPC-006	Cumulative Schemes, In-Combination and Impact	As a Parish Council we are gravely concerned about the number of solar projects proposed which will carpet South Norfolk in solar panels.	The Applicant is aware of other projects in the region. The technical chapters of **ES Volume 1 [APP-042** to **054]** presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The **Statement of Need [APP-206]** explains that the Scheme's proposed location is an appropriate

ID	Theme	Representation	Applicant's Response
			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 (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.

2.2 Bedingham Parish Meeting

Table 2.2 Applicant's Response to Bedingham Parish Meeting [RR-1079]

ID	Theme	Representation	Applicant's Response
BePM-01	Landscape and Visual	For the purposes of registering the main concerns that have been raised relate to 1. the sheer scale of the proposal across an enormous tract of quiet, nature rich, diverse agricultural and conservation 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, Appendix 7.9 [APP-149]** and on residential properties in **ES Volume 3, Appendix 7.8 [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.

ID	Theme	Representation	Applicant's Response
			The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **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 landscape character 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. Conservation Areas are assessed as heritage receptors in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**, and have also informed judgements on the value of landscape and visual receptors in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**.
BePM-02	Transport and Access	Using many tiny backroads (many C roads, of particular note I refer you to Baxters Lane) to access the sites drawn across a tapestry of small villages, hamlets and open countryside	**ES Volume 1, Chapter 11 - Traffic and Access [APP-043]** and **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **APP-177]** presents an assessment of the Scheme on traffic and access, with the proposed construction

ID	Theme	Representation	Applicant's Response
		implicating numerous public footpaths, byways and bridleways,	routes and access points shown in the **Outline CTMP [APP-201]**. The Applicant acknowledges that the access strategy requires construction vehicles to route on narrow rural carriageways. Where practicable, this has been mitigated through the inclusion of internal haul routes to reduce movements on the Local Road Network. Other measures include the use of vehicle holding areas and call forward to site, alongside avoiding HGV deliveries during peak periods. These measures are designed to reduce effects on rural carriageways and are detailed within the **Outline CTMP [APP-201]**. The Applicant notes that a short section of Baxter's Lane is required to facilitate access to Site 8, as detailed in Table 4.1 of the **Outline CTMP [APP-201]**, there are anticipated to be a peak daily trip generation of 4 HGVs and 11 cars/shuttles/LGVs to Site 8, movements of which will be subject to the proposed management measures. 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 the **Outline PRoWPPMP [APP-203]** to minimise impacts as far as practicable. Detailed CTMP, OTMP and PRoWPPMP will be submitted to and approved by the relevant planning authority in

ID	Theme	Representation	Applicant's Response
			accordance with Requirements 15, 16 and 17 of the **Draft DCO [AS-032]**. 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 AIL movements will be undertaken using strict traffic management and notification of these types of movements will be communicated in advance. 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. As part of the management of AIL, the selected haulier must notify the police, highway authorities and bridge owners when planning to transport AIL. It is likely that AIL deliveries will require temporary road closures or diversions on the day of the delivery and may require police escorts to maintain the safety of members of the public.
BePM-03	Ecology and Biodiversity Cultural Heritage	Taking no consideration of the uniqueness of the chalk streams, ancient woodlands, historic and listed buildings contributing to the economic value and appeal of gentle tourism for	This is noted by the Applicant. These topics are considered in the **ES [APP-036** to **APP-195]**.

ID	Theme	Representation	Applicant's Response
	Socio-Economics	many SMEs in the district appealing to cyclists, walkers, naturalists and the like.	
BePM-04	Cumulative, In-Combination and Impact	The proposal has been less than clear and honest about the cumulative impact of this gargantuan imposition on this rural enclave for its own economic benefit.	The assessments within the **ES [APP-036** to **APP-195]**, have considered all components of the Scheme as a whole, including the National Grid Substation and Grid Connection Infrastructure, the Project Substations and the BESS, together with the Solar PV Arrays and **Green Infrastructure Strategy [AS-005]**. 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 methodology for the cumulative effects assessment and the cumulative developments list is detailed within **ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116**]. The cumulative effects assessment of the ES has been undertaken in line with the EIA Regulations and the PINS Advice on Cumulative Assessment, and is considered to a robust yet proportionate approach to assessing the cumulative impacts of the Scheme.

ID	Theme	Representation	Applicant's Response
BePC-05	EIA Methodology	Even less consideration is being shown to some of the processes that are expected of a proposal of this size and I would refer you to the much more detailed submission by BEPS (Block East Pye Solar) for the granular detail of that.	The Applicant has provided responses to Block East Pye Solar's Relevant Representation in the **Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [EN0110014/EXAM/8.8]**
BePCM-06	Agriculture and Soils	Agricultural land being taken out of production in this valuable growing part of our country which is only 65% self sufficient, vulnerable to multiple geopolitical and global weather incidents interrupting a food supply for the 70 m people on our isles...The March 2026 Land Use Framework for England reinforces the importance of protecting productive agricultural land for our food security. Around 80% of the land proposed for East Pye solar fields is BMV 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. To date, the Applicant has demonstrated that (based on ALC surveys undertaken to date) the Order Limits of the Scheme, contains 68.4% BMV land within **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]**. 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

ID	Theme	Representation	Applicant's Response
			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.
BePM-07	Construction and Decommissioning	Added to this the laudably lacklustre and unclear plan for how this land may be returned to its proper use, or how it will be dismantled at the inevitable end of the panels' lives and how and where the solar panels and their incumbent infrastructure will be disposed of in 40/60 years when most of us will be long gone emphasises most coherently why we must reject this industrialisation of living countryside (on the cheap for the likes of whichever corporate is building them) and implore current and successive governments to seek out more imaginative ways to support a move to cleaner energy ... like perhaps not collapsing in front of housing developers who refuse to make new homes ready for solar (and persistently renege on their social housing commitments while they're at it.	The Applicant confirms that the DCO incorporates enforceable mechanisms to regulate Scheme delivery. Failure to comply with a DCO Requirement is a criminal offence. A detailed Decommissioning Environmental Management Plan 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 20 in Schedule 2 of the **Draft DCO [AS-032]**. In addition, except for the National Grid Substation and Grid Connection Infrastructure, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning taking place following cessation of operation. This is secured by Requirement 21 in Schedule 2 of the **Draft DCO [AS-032]**. The **Outline DEMP [APP-198]** sets out that, on decommissioning, Sites with Solar PV Arrays will

ID	Theme	Representation	Applicant's Response
			be returned to farmers and landowners, with tracks and the BESS Site removed and original topsoil returned to the area, so that the land is restored to its previous agricultural use as far as practicable. The Applicant confirms that, if consent is granted, it has the capability to build, own and operate the Scheme. The **Funding Statement [APP-021]**demonstrates that the Scheme is financially viable and adequately funded for the Scheme to be delivered.

2.3 Bergh Apton Parish Council

Table 2.3 Applicant's Response to Bergh Apton Parish Council [RR-0191]

ID	Theme	Representation	Applicant's Response
BAPC-001	Landscape and Visual Cultural Heritage	As a parish council of a neighbouring village we have received notification of the proposed East Pye Solar Farm. These comments are lodged on behalf of the Parish Councillors, people who live in the area and have done for many many years and frequent the villages and facilities offered and which will be affected by these proposals. Our concerns are as follows:- 1. This project in addition to the proposed building of new homes in the area is and will in the future be close to residential properties and totally negatively changes the appearance of the countryside. 2. The areas affected are small villages and hamlets, with conservation areas, sites of special scientific interest, woodlands, nature reserves, beautiful traditional countryside in which there are historical buildings and properties such	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. The Applicant has assessed the likely significant effects of environmental impacts, including conservation areas, sites of special scientific interest, woodland and historical buildings in 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. The management plans are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032].** 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

ID	Theme	Representation	Applicant's Response
		as listed buildings. The preservation of these villages and hamlets will be totally destroyed by this expanse of industrial power equipment and the whole ethos of village life, history and beauty will be affected and lost.	(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. 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.
BAPC-002	Community impact	3. People choose to live in such villages and hamlets to be away from industry and commerce and wish to bring up their families in a healthier environment. These days mental health is a major consideration to the busy lifestyles many people lead. Family life is crucial in a society where there are many factors eroding this. These ugly structures in the countryside erode into a healthier countryside way of life which people seek and need.	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 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 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

ID	Theme	Representation	Applicant's Response
			considered to have been appropriately assessed at a population level. Mitigation measures to avoid and reduce environmental impacts have been embedded within the Scheme and are set out in the various management plans, which are secured within the DCO, including **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]**.
BAPC-003	Ecology and Biodiversity	4. Wildlife and biodiversity is detrimentally affected to a large degree. Many species of wildlife are already diminishing to the extent of extinction due to the changing landscape. We have a duty to nurture and protect our wildlife and the biodiversity, and strategic zones for protected species would be affected and/or entirely lost.	The likely significant effects on ecology and biodiversity are assessed in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**, together with mitigation measures. Following the implementation of embedded mitigation, **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** concludes that no likely significant adverse effects on ecology and biodiversity have been identified during the construction, operation and maintenance, and decommissioning phases of the Scheme. 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]**, **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]** these are in turn secured by the associated requirement within Schedule 2 of the **Draft DCO [AS-032]**. 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.
BAPC-004	Cumulative Schemes, In-Combination and Impact	5. Should the green light be given to this project, this would only encourage further similar development of solar farms and possible enlargement of these proposed areas.	The Applicant is aware of other projects in the region. 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.

ID	Theme	Representation	Applicant's Response
			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 (inclusive of Suffolk). 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. The Applicant notes that any future development in the area would be subject to the relevant and applicable planning process, and through which its acceptability would be scrutinised. Such development would be required to take into account any cumulative impacts in combination with East Pye Solar
BAPC-005	Soils and Agriculture	6. In addition to being a blight on the beautiful countryside, precious agricultural land is being used and one has to wonder if in future years, there will be an acute shortage of such 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

ID	Theme	Representation	Applicant's Response
		resulting in the severe reduction/loss in food production in the area. This has to be taken into account in addition to the other development in the country generally and the overall loss of agricultural land for this purpose.	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.
BAPC-006	Site Selection, Alternatives and Design Evolution	7. Brownfield sites should be given consideration to the location of such sites.	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

ID	Theme	Representation	Applicant's Response
			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 or brownfield. 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]**. Solar farms do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. **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 relevant

ID	Theme	Representation	Applicant's Response
			planning authority, as secured by a Requirement 18 in the **Draft DCO [AS-032]**.
BAPC-007	Transport and Access	8. Rights of way, bridleways including permissive bridleways and other public access ways will be affected/lost resulting in the loss of enjoyment to villagers and other members of the public.	A 15m buffer to PRoW/bridleways has been incorporated into the design of the Scheme, as secured through the **Design Principles, Parameters and Commitments [APP-213]**. The Applicant is also committed to the provision of new permissive paths and community accessible space, as set out in the **Design Principles, Parameters and Commitments [APP-213]** and **Outline LEMP [APP-199]** which will provide opportunities for access and recreation
BAPC-008	Landscape and Visual	9. It is understood these solar farm areas require enclosing, screening and CCTV. Any young trees/hedging will take many years to grow to a sufficient height whereby obscuring these unsightly areas and this project will destroy views of the open countryside.	The Applicants Landscape and Visual Assessment presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has been undertaken in accordance with the appropriate guidelines it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The Applicant acknowledges the Scheme would introduce a series of new features into the rural landscape however the Applicant considers at worst this would result in moderate adverse effects in the long term (in some locations proximate to the Scheme (not all)) which are reversible as reported in **ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120],** and **ES Volume**

ID	Theme	Representation	Applicant's Response
			3, Appendix 7.3 – Visual Assessment Tables [APP-147]. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects.
BAPC-009	Transport and Access	10. The construction and potential maintenance of these solar farm areas will involve large HGVs using the small, narrow, unsuitable countryside lanes. These village roads generally have no speed restrictions and this increased use by HGVs present a danger to walkers, children walking to school, horse riders and dog walkers and result in private verges and driveways becoming damaged and damage to the road surfaces.	**ES Volume 1, Chapter 11 - Traffic and Access [APP-043]** and **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174]** to **[APP-177]** presents an assessment of the Scheme on traffic and access, with the proposed construction routes and access points shown in the **Outline CTMP [APP-201]**. 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 the **Outline PRoWPPM [APP-203]** to minimise

ID	Theme	Representation	Applicant's Response
			impacts as far as practicable. Detailed CTMP, OTMP and PRoWPPMP 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]**. 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 AIL movements will be undertaken using strict traffic management and notification of these types of movements will be communicated in advance. 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. As part of the management of AIL, the selected haulier must notify the police, highway authorities and bridge owners when planning to transport AIL. It is likely that AIL deliveries will require temporary road closures or diversions on the day of the delivery and may require police escorts to maintain the safety of members of the public. **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** consider fear and intimidation

ID	Theme	Representation	Applicant's Response
			on non-motorised users on roads, which includes horse riders. Measures to manage traffic and access are provided in the **Outline CEMP [APP-196]**, the **Outline CTMP [APP-201]**, the **Outline OEMP [APP-197]** and the **Outline OTMP [APP-202]**. An **Outline PRoWPPMP [APP-203]** has also been prepared which provides an assessment of PRoW and permissive paths, including bridleways, during construction, operational, and decommissioning phases. The PRoW management phases measures will be developed further in the detailed PRoWPPMP to be secured by Requirement 17 of the **Draft DCO [AS-032]**.
BAPC-010	Construction and Decommissioning	11. The development process spans over a 2-3 year period during which residents and users of the villages and their amenities will be detrimentally impacted by the construction and HGVs and increase in traffic in connection with such development.	The Applicant notes this and refers to its response provided under comment reference BAPC-009.

2.4 Brooke Parish Council

Table 2.4 Applicant's Response to Brooke Parish Council [RR-0216] and [RR-0217]

ID	Theme	Representation	Applicant's Response
BPC-001	Statement of Need Policy Compliance	Brooke Parish Council objects to the East Pye Solar Scheme because its adverse effects are not marginal, temporary or capable of being adequately mitigated. The Scheme 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. Several of Brooke Parish Council's objections are not merely matters to be	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, Paras. 4.2.16 – 4.2.17). 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

ID	Theme	Representation	Applicant's Response
		weighed in the ordinary planning balance. They are legal gateway issues.	management plans, which will ensure that the impacts are kept to a minimum, are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032].** The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [APP-209]**. The Applicant considers that the substantial benefits of the Scheme, together with the urgent need and critical national priority (CNP) status afforded to low carbon infrastructure under Government policy, clearly outweigh any residual adverse effects. 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. The Applicant draws attention to the **Planning Statement [APP-209]**, which provides an appraisal of the Scheme against the relevant policy and legislative framework, and the **Policy Compliance Document [APP-210]**, which together demonstrate that the Scheme is in accordance with national energy policy, national planning policy, and the relevant development plan when considered as a whole. The Applicant further notes that the DCO Application was validly accepted for Examination by the Secretary of

ID	Theme	Representation	Applicant's Response
			State, having been prepared in accordance with the Planning Act 2008 and the APFP Regulations. 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 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 refers to its response to row ToPC-015.
BPC-002	Planning, Policy Compliance	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	Legal 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]**, the **Policy Compliance Document [APP-210]**, the **Shadow Habitats Regulations Assessment [AS-036]**, the **ES [APP-036** to **APP-195]**, and the **Statement of Reasons [APP-020].** Mitigation is secured through

ID	Theme	Representation	Applicant's Response
		require the applicant to prove legal compliance before consent is granted.	Requirements in Schedule 2 of the **Draft DCO [AS-032]**.
BPC-003	Policy Compliance	Brooke Parish Council therefore submits that the application should not be accepted or, if accepted, should be refused development consent unless the applicant first remedies the fundamental evidential, procedural and legal deficiencies identified in the attached full representation.	The **Planning Statement [APP-209]** and the **Policy Compliance Document [APP-210]** set out the Scheme's compliance with the relevant statutory and policy framework, and the Applicant will respond to any specific matters raised through the Examination process.
BPC-004	Statement of Need	1.No demonstrated need for this Scheme in this location or region Brooke Parish Council does not dispute the general national policy support for renewable energy. However, generalised 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. BROOKE PARISH COUNCIL submits that this is fatal to any claim that East	Please refer to Applicant's response to BPC-001. Chapter 7 of the **Statement of Need [APP-206]** describes that the Scheme proposes to connect to a well-connected section of the NETS which has available transmission capacity and is geographically distant from areas of the network which currently are constrained. Section 8.4 of the Statement of Need describes the causes and characteristics of curtailment on the current transmission network. The Statement of Need concludes that transmission constraints are less likely to cause curtailment at the Scheme during its operational life than may be experienced at other locations. 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
		Pye Solar is specifically needed in this location or region. Furthermore, the Statement of Need also admits that the BESS element has secured only a Gate 1 prioritisation with no confirmed indicative connection date. The applicant nevertheless relies throughout the Statement of Need on the benefits of co-located storage, flexibility and affordability. In Brooke Parish Council's 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 any flexibility and is very likely to require expensive constraint. 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	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*." 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 electrolysers) 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

ID	Theme	Representation	Applicant's Response
		which has been managed for conservation using public money. These are not impacts which can be treated as generic solar impacts. They arise because of the particular siting and design of this Scheme. Brooke parish Council's position is that the planning balance is fundamentally adverse. Where a project causes severe, and in some cases, legally protected harms, the applicant must do more than rely on abstract 'national need' or optionality for 'attrition'. It must prove that the Scheme is needed here and that the harms can lawfully be mitigated. The application fails to do this. 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. If 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,	component of the Scheme to a future re-prioritisation round to seek a Gate 2 connection offer (firm connection date) for the BESS. 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. These constraints have been informed by national policy on factors relevant to site as set out within NPS EN-1 and EN-3. In particular, Section 4 of the **Site Selection Assessment [APP-215]** describes the consideration of the factors identified in NPS EN-3 in relation to the site selection process. 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. Land availability (i.e. the participation, or willingness of landowners) is a key consideration for site selection, as the Applicant intends to avoid compulsory acquisition as far as practicable. 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

ID	Theme	Representation	Applicant's Response
		proportionate or supported by a compelling case in the public interest.	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.
BPC-005	The Applicant	2.Appearance of bias concerning DESNZ and Macquarie Brooke Parish Council 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 EIR2026/03951; IC-429804-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	The Applicant notes this comment and refers to its response provided to Block East Pye Solar in the **Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [EN0110014/EXAM/8.8]**.

ID	Theme	Representation	Applicant's Response
		reasonably question whether the department has maintained sufficient separation between policy facilitation, commercial delivery and its later adjudicative function. 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, encouraged or facilitated a view that the project should proceed. Brooke Parish Council 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. Brooke Parish Council 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,	

ID	Theme	Representation	Applicant's Response
		delegation, independent review or other procedural safeguards are required.	
BPC-006	Ecology and Biodiversity	3.European protected species and Habitats Regulations issues The ecological objections are among the most serious issues. The Scheme affects an area identified as being of exceptional importance for bats, including barbastelles. 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's case does not adequately demonstrate that the Scheme can avoid harm to protected bat populations. Brooke Parish Council 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	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 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.

ID	Theme	Representation	Applicant's Response
		functional dark landscape used for commuting, foraging, roosting and population movement. If favourable conservation status cannot be secured, the Scheme cannot lawfully proceed. The Tas chalk-stream system also requires specific attention because evidence of white-clawed crayfish within the connected catchment, within 2KM of the scheme, fundamentally changes the ecological baseline. The applicant was provided with this evidence from Norfolk Rivers Trust pre-application but has not included it in their application. They cannot lawfully rely on assumptions of absence or surveys undertaken when streams and ditches were dry. 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, including WFD compliance and protected species implications The applicant's Habitats Regulations position is also disputed. The application appears to rely on a conclusion of no likely significant effects,	The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [APP-213]** and illustrated in **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. **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. Requirement 8(2) provides that the 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

ID	Theme	Representation	Applicant's Response
		despite hydrological and ecological connections across the Order Limits and downstream catchments. Brooke Parish Council 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. BROOKE PARISH COUNCIL submits that these are not ordinary planning balance matters. They engage strict legal protections. Unless the applicant can demonstrate, on robust evidence, that European protected species will not be unlawfully harmed and that there will be no adverse effects on protected sites or qualifying ecological interests, the Scheme cannot lawfully proceed.	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. As set out in the **Applicants Position Statement on White Clawed Crayfish [EN0110014/EXAM/8.4]** states: *The Applicant's approach to white-clawed crayfish is based on evidence that habitat within the Order Limits is largely unsuitable, with no records within 2 km, no field signs recorded during surveys, and watercourses characterised by fine sediments, limited refugia and poor hydrological permanence. While recognising that surveys were undertaken during dry conditions and that the River Tas and Hempnall Beck are sensitive receptors, the Applicant considers further survey work unnecessary given current drought conditions and the low likelihood of presence. Instead, a precautionary approach is adopted through extensive avoidance and mitigation measures, including designated Avoidance Areas, trenchless*

ID	Theme	Representation	Applicant's Response
			watercourse crossings, stand-off distances, pollution prevention, sediment control and biosecurity measures. On this basis, the Applicant concludes that significant effects on white-clawed crayfish are not anticipated, even if the species were present within hydrologically connected downstream habitats.
BPC-007	Water Framework Directive	4.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. Brooke Parish Council is particularly concerned about the River Tas, Hempnall Beck and associated chalk	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 [APP-220]** that there will be no likely significant adverse effects at Norfolk Valley Fens SAC, The

ID	Theme	Representation	Applicant's Response
		stream catchments, as well as the Waveney-linked drainage network. Chalk streams are rare and highly sensitive habitats. Harm to hydromorphology, water quality, flow, sediment balance and aquatic ecology may be difficult or impossible to reverse. 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. Brooke Parish Council 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. 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	Broads SAC, Broadland SPA and Broadland Ramsar internationally designated sites. The **ES Volume 3, Appendix 9.2 - Water Framework Directive Assessment [APP-163**] is based on currently available information and will be updated 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 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.

ID	Theme	Representation	Applicant's Response
		affect wells, boreholes or groundwater-fed supplies. This is a public health issue as well as an environmental issue. Brooke Parish Council 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 has not been assessed at all. 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	

ID	Theme	Representation	Applicant's Response
		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	
BPC-008	Water Environment – Water Quality, Drainage and Flood Risk	5.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. BROOKE PARISH COUNCIL 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 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	The Applicant notes this comment and refers to its response provided to Block East Pye Solar in the **Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [EN0110014/EXAM/8.8]**.

ID	Theme	Representation	Applicant's Response
		analysis before consent would leave fundamental matters to be resolved later, when the principle of development had already been approved. BROOKE PARISH COUNCIL objects to that approach. Contamination and water impacts must be assessed before consent, not deferred.	
BPC-009	Soils and Agriculture	6.Best and most versatile agricultural land and soil harm The Scheme would remove a very large area of grade 2 and grade 3a Best and Most Versatile agricultural land from productive use for a substantial period. BROOKE PARISH COUNCIL objects to the applicant's treatment of this harm as reversible or adequately mitigated. Long-term solar deployment 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. Brooke Parish Council also objects to the lack of certainty around	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: *'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).'* The Land Use Framework (LUF) is not a material consideration for the preparation of development

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		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. The March 2026 Land Use Framework for England reinforces the importance of protecting productive agricultural land and food security. Around 80% of the land proposed for East Pye solar fields is BMV land. Brooke Parish Council 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. Around 80% of the land proposed for East Pye solar fields are BMV land. On this basis, the East Pye proposal should be judged contrary to policy and refused.	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 as per NPS EN-3 paragraph 2.10.58 which states that Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed. 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. 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.

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			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]**.
BPC-010	Cultural Heritage	7.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. The Scheme would industrialise a wide and tranquil rural landscape. Its impacts would not be confined to individual parcels of land but	An assessment on heritage assets, including Conservation Areas and 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]**. 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. The Applicant disagrees with the assertion that the assessment relies on "limited or seasonally unrepresentative viewpoints". The LVIA within **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** includes both summer and winter photography, with winter photography representing

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		would be experienced cumulatively across villages, lanes, public rights of way, heritage settings and residential receptors. Brooke Parish Council considers that the applicant has understated the true visual and landscape 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. Residential amenity 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 would be surrounded or materially affected by the Scheme.	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. A visual amenity assessment on residential properties is presented in in **ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148]**. The methodology follows GLVIA3, a recognised industry standard. 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

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			landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
BPC-011	Aviation (Tibenham) Cumulative Schemes, In-Combination and Impact	8.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. Brooke Parish Council does not consider that these issues have been sufficiently integrated into the site selection and alternatives assessment. The cumulative assessment is also inadequate. The applicant's presentation of other major energy and infrastructure projects does not properly show their true landscape extent or cumulative relationship with East Pye Solar. Brooke Parish Council is concerned that projects such as Tasway and other energy infrastructure have been treated inconsistently. A lawful cumulative assessment must assess the real-world cumulative burden	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 effect, and therefore distraction and operational constraints, is not predicted. 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

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		on the landscape, communities, ecology, water systems, aviation interests and grid infrastructure.	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]**.
BPC-012	Consultation and Engagement Legal	9. Consultation and procedural unfairness Brooke Parish Council objects to the adequacy of consultation. The Scheme evolved over time, with new parishes, residents and land interests brought into scope through targeted consultation. Brooke Parish Council 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 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	The Applicant considers that the consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, 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, as well as the statements outlined in the **Section 55 Checklist [PD-003]**, 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

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		process. 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, WFD duties, aviation safety, contamination risk and the basic deliverability of the Scheme.	Applicant's approach to pre-application consultation. Throughout the pre-application period (from September 2024 to March 2026), 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. In addition to the above, USB memory sticks with the full suite of application documentation were made available for electronic inspection via computer, free of charge, during the Relevant Representation period, 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 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 sticks were

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			available to be sent directly to individuals upon request. The Applicant's Section 56 Notice **[OD-003]** provided further information on obtaining DCO application documents. 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.
BPC-013	Planning, Policy Compliance	10. Overall planning balance and remedies sought Brooke Parish Council 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 shown that less harmful alternatives have been properly assessed. It has not resolved gateway legal issues relating to protected	The Applicant notes this comment and refers to its responses to BPC-001 to BPC-012.

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		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. Brooke Parish Council therefore asks the Examining Authority and the Secretary of State to refuse development consent. If the Examining Authority considers that any part of the application should proceed further, Brooke Parish Council submits that it cannot lawfully do so 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, white-clawed crayfish and bat) surveys, a robust Habitats Regulations	

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		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. For the reasons set out in this summary and in the attached full representation, BROOKE PARISH COUNCIL submits that East Pye Solar is not an acceptable or lawful development in its present form.	
BPC-014	Statement of Need Site Selection, Alternatives and Design Evolution	*Specific objection to Site 9* No Regional Need and Unmitigable Harm I object to the East Pye Solar project as a whole, and specifically to the inclusion of Site 9. The applicant relies on a general national need for solar	The Applicant notes this comment and refers to its response to BPC-001. Site 9 has been subject to significant constraint-led refinement through the iterative design process, as set out within the **Design Approach Document [APP-212].** These design changes demonstrate that the constraints affecting Site 9 have been

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		generation, but has not demonstrated that this Scheme is required in this location. The applicant's own material accepts that prioritised schemes already meet the relevant regional solar capacity ranges. General claims about 'optionality' and 'attrition' cannot justify major harm in a highly sensitive location. Site 9 adjoins Brooke Wood, lies within a nationally important barbastelle landscape, affects rural tourism businesses, raises heritage and access concerns, and sits within a sensitive water and ecological network. These are front-loaded constraints, not matters capable of being cured by later management plans.	addressed through a rigorous, evidence-led application of the mitigation hierarchy. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably shows substantial public benefits (arising from all constituent parts of the Scheme, including Site 9) 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. The **Site Selection Assessment [APP-215]** concludes that there are no locations identified within the search area that are more suitable and available than the proposed location for the Scheme, and, in accordance with paragraph 4.3.24 of NPS EN-1, 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.

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			Chapter 7 of the **Statement of Need [APP-206]** describes that the Scheme proposes to connect to a well-connected section of the NETS which has available transmission capacity and is geographically distant from areas of the network which currently are constrained. Section 8.4 of the Statement of Need describes the causes and characteristics of curtailment on the current transmission network. The Statement of Need concludes that transmission constraints are less likely to cause curtailment at the Scheme during its operational life than may be experienced at other locations. The commissioning of a BESS (as is proposed as associated development to the Scheme) would allow the Scheme to provide its own operational flexibility to the electricity system, reducing further the potential for transmission constraints to restrict exports
BPC-015	Ecology and Biodiversity	*Specific objection to Site 9* European Protected Species: Barbastelle Bats and Brooke Wood Site 9 directly adjoins Brooke Wood and lies within associated barbastelle Core Sustenance Zones. The Norfolk Barbastelle Study Group report identifies Brooke Wood specifically the 2025 survey work. It was divided into west and east survey blocks because of	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 with the Planning Inspectorate, as described in Section 8.2 of the **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**.

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		its size, and both parts were surveyed for barbastelle potential. Acoustic survey method predicted the presence of barbastelle maternity colonies in the mature oak belt in Brooke Wood and that barbastelle calls were recorded on all nights in July in both east and west sides of the mature oak woodland belt, with the threshold of four calls in the hour after sunset reached on four nights in Brooke Wood East, peaking at 15 calls. The same report expressly states that further radiotracking is needed to confirm the presence of maternity colonies in Brooke Wood, and that the impacts of East Pye Solar on barbastelles cannot be properly assessed without a full understanding of barbastelle distribution and habitat use within the Scheme area. In those circumstances, the applicant cannot lawfully proceed on assumptions. Construction disturbance, fencing, panel arrays, cabling, access movements, lighting risk, noise, vibration and long-term habitat severance would directly affect functionally linked habitat next to a woodland where maternity-colony	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 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 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-213]** and illustrated in **ES Volume 2, Figure 4.1 – Indicative Masterplan**

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		presence is predicted and roosting / feeding use is confirmed. The precautionary approach required for European Protected Species licensing has not been met. In particular, given the lack of regional need for additional solar capacity and the existence of less harmful alternatives, the 'no satisfactory alternative' test is highly doubtful. Favourable conservation status cannot be assumed where the Scheme affects multiple overlapping CSZs and an incompletely surveyed metapopulation.	**[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 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. It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for an European

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			Protected Species Mitigation License for Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would result in: (a) to impair their ability—to survive, to breed or reproduce, or to rear or nurture their young; or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) to affect significantly the local distribution or abundance of the species to which they belong. Further information regarding the creation of habitats within the Scheme is provided 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.
BPC-016	Arboriculture	*Specific objection to Site 9* Rare Botany, Hedgerows and Ditches The access routes and cable corridors connecting to Site 9 are known to support rare botanical assemblages, yet no adequate botanical survey has been	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

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		carried out despite proposals for road widening and infrastructure works. A level 6 botanist has written an open letter to East Pye Solar prior to submission advising that full-season botanical surveys are required before the project progresses. In preparation for East Pye Solar, an ancient hedgerow on site 9 has already been removed during nesting season and an ancient ditch filled in without permission. These matters reinforce the need for a precautionary and evidence-led assessment. They also call into question whether the baseline used for the ES properly reflects the ecological value and historic landscape features of Site 9.	presented in **ES Volume 3, Appendices 8.1 – 8.9 [APP-152 – APP-160]**. An assessment of potential effects of the Scheme on habitats 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]**. Embedded design principles are detailed within **Design Principles, Parameters and Commitments [APP-213]** and illustrated in **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

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			benefit of biodiversity, as detailed within the **Outline LEMP [APP-199]**. An extended habitat survey using UKHab methodology (the standard adopted habitat survey methodology employed in lowland England) 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. 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. Regarding the hedgerow removal on Site 9 - The Applicant does not have control over actions

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			undertaken independently by individual landowners. Any such activities would fall under the relevant environmental and planning legislation and enforced, where appropriate, by the competent regulatory authorities.
BPC-017	Water Environment - Water Quality, Drainage and Flood Risk	*Specific objection to Site 9* Water Environment and Flood Risk Site 9 sits in a highly sensitive chalk-stream and chalk-aquifer catchment with hydrological connectivity to the River Tas, private sewerage and vulnerable water receptors. Impacts on private sewerage and hydrological connectivity have not been assessed, and insufficient hydrological and hydrogeological modelling has been undertaken. Site 9 lies within areas of variable flood risk, including Flood Zone 3. The combination of ground disturbance, cabling, access works, panel installation, runoff change and flood risk creates credible pathways for sediment and pollution to affect downstream receptors. This risk is not adequately	Site 9 is located within Flood Zone 1, as outlined in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** and supporting **ES Volume 2, Figure 9.3 – Flood Zones**. Localised areas of surface water flood risk are present within Site 9, however the areas of higher risk are predominantly located in the north and east which are to be left as retained agricultural land in accordance with the **2.3 Works Plans [AS-002 and AS-003]** or are associated with field ditches. The proposed use for Site 9 will be solar panels which are located within Flood Zone 1, 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 ground across the panel fields will consist of a grass and/or wildflower meadow maintained at a

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		addressed by generic outline management plans.	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. Embedded mitigation for the management of pollution risk to receptors (leaks / spills / contaminants in surface water runoff), including private water supplies and the River Tas is secured within the O**utline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]**.
BPC-018	Cultural Heritage	*Specific objection to Site 9* Heritage, Historic Landscape and Rural Tourism Land Parcel 9 lies within the setting of multiple listed buildings, historic farmsteads and the Brooke–Kirstead Conservation Area. The area is known for ancient field patterns, historic routeways and strong intervisibility between heritage assets and the surrounding countryside. The proposals would fundamentally alter the setting in which these heritage assets are experienced. This heritage harm is not	The Applicant notes that a full assessment of the setting, significance, and potential impacts to the Brooke & Kirstead Conservation Area is provided within **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168]**. The significance of Brook & Kirstead Conservation Area is vested in its preserved historic character as a rural village. The interrelationship between its historic buildings and the development of the village from medieval times onwards is the main contribution to both this assets significance and setting. Within the conservation area itself, a sense of enclosure is experienced with houses fronting onto the roads lined with mature vegetation, which

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		limited to visual impact. It includes the loss of rural setting, erosion of tranquillity, interruption of historic field pattern and conversion of a working rural landscape into an industrial energy landscape. The statutory duties relating to listed buildings and conservation areas have not been satisfied. The economic harm is also substantial. Land Parcel 9 would affect established rural tourism and holiday-let businesses, including Waterfield Cottage, Brooke View Barns, Wood Farm, Waldor Cottage and nearby properties. These businesses depend on tranquillity, dark skies, open countryside, historic landscape character and access to public rights of way. The Scheme would destroy the amenity on which those businesses rely, causing permanent economic displacement rather than a temporary construction impact. Existing tourism businesses are a material socio-economic receptor. The applicant has not shown that their loss of amenity, income, marketability and viability can	provides an inward facing atmosphere and strong sense of tranquillity. Tree belts exist along the settlement edges, with views of the countryside from within the village itself, and vice versa, very limited. Site 9 is largely screened from the Conservation Area due to the presence of the mature vegetation surrounding much of the village; however, it is acknowledged that views between Site 9 and the cricket club exist, with this complex situated to the south of the main core of the village, beyond the southern treeline. However, this intervisibility is not considered to be a significant viewpoint within the conservation area. The High Green area of the Brooke & Kirstead Conservation Area (at its south-westernmost corner) extends to within c. 130m north of Site 9, at their nearest points. As part of the design process, the south-western approach into the conservation area was considered, as when travelling north into the High Green area, these views could include glimpsed views of the western part of Site within their vistas. As such, Solar PV Panels were entirely removed from the western half of Site 9, with these areas to be retained as agricultural land. Existing field boundaries are to be reinforced with new hedgerows with trees.

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		be mitigated or compensated through planning conditions.	The removal of Solar PV Panels from the western half of Site 9 will also help retain the rural backdrop for the westernmost part of the conservation area, with this rural backdrop noted as being an important landscape gap. Solar PV Panels will solely be positioned within the two fields within the eastern half of Site 9. To help offset any potential glimpsed views from Brooke & Kirstead Conservation Areas a new native linear tree belt will be established immediately south of the trackway which forms the northern boundary of Site 9. In regard to historic landscape character, the existing field boundaries are to be retained and, where necessary, reinforced by additional planting. 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. It is considered there will be no impact to the historic field pattern within the area. **ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** incudes an assessment on local tourism assets. It concludes that during the Construction Phase there will be a Minor Adverse effect on the Tourism Industry, reflecting: the

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			potential for disruption but also the potential for some beneficial effects relating to workforce expenditure. There is also a Minor Adverse effect during the Operation and Maintenance Phase, relating to the potential for visual amenity and glint and glare effects. There are no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm. Any losses incurred by Pulham Patch will be addressed through an agreed compensation arrangement. Effects on Jobs, Employment, and the Supply Chain were identified as positive for a range of effects during all Phases; significantly, these include a Major Beneficial effect on workplace-based employment in South Norfolk during Construction and Moderate Beneficial effects on skills in South Norfolk during both the Construction and Operation and Maintenance Phases.
BPC-019	Transport and Access	*Specific objection to Site 9* Access and Rural Lane Unsuitability Access to Land Parcel 9 depends on narrow, single-track rural lanes with poor alignment and no passing places. These routes are manifestly unsuitable for HGVs or	As stated in Section 7 of the **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174]**, AILs are not proposed to access Site 9. The peak daily trip generation associated with the construction of Site 9 is 3 HGVs and 11 cars/shuttles/LGVs, as shown in Table 5.1 of the same document. Management and mitigation measures are set out in the **Outline CTMP [APP-**

ID	Theme	Representation	Applicant's Response
		Abnormal Indivisible Loads and any attempt to upgrade them would itself cause unacceptable landscape, ecological and heritage harm. This is not a minor construction-management matter. If safe access cannot be demonstrated without road widening, verge loss, hedgerow loss, ditch interference or harm to historic lanes, the site is not deliverable in planning terms.	**201]** to reduce impacts on the Local Road Network, and include the use of vehicle booking systems to proactively manage the arrivals and departures of construction vehicles onto site. Site access design, vehicle tracking and swept-path analysis has also been undertaken to assess the suitability of access to each site parcel, including Site 9. This is shown in Appendix C of the **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to 177]**. Given the outcome of this assessment, alongside the proposed mitigation measures, the access to Site 9 is considered appropriate and will be proactively managed during the temporary construction phase to minimise impacts.
BPC-020	General	*Specific objection to Site 9* Conclusion and Requested Outcome Site 9 fails on multiple independent and reinforcing grounds: predicted barbastelle maternity-colony use at Brooke Wood; unresolved EPS licence risk; direct effects on functionally linked foraging and commuting habitat; rare botany survey missing entirely; ancient hedgerow and ditch loss concerns; sensitive water and flood-risk pathways;	The design of Site 9 has evolved through an iterative process informed by environmental surveys, the environmental assessment process and consultation feedback, as set out in **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-040],** the **Design Approach Document [APP-212]** and secured through the D**esign Principles, Parameters and Commitments [APP-213]**. Embedded mitigation, including buffers to sensitive ecological, heritage and water features, has been incorporated into the Site 9 layout in response to identified constraints.

ID	Theme	Representation	Applicant's Response
		heritage and conservation-area harm; severe harm to rural tourism; and unsuitable rural access. These are not residual impacts that can be outweighed by a general national need. They go to legal deliverability, adequacy of assessment, and the principle of development in this location. I object because the applicant has not shown that this harmful Scheme is necessary, environmentally acceptable, legally deliverable or capable of adequate mitigation. The Examining Authority should recommend refusal of the Scheme as a whole, or at minimum require removal of Site 9 from the Order Limits.	Specific design changes at Site 9 include the reduction of the Solar PV Array area at Stage 2, with an area on the southern boundary excluded to protect residential properties on Mill Lane, and the north-western corner removed to reduce potential effects on nearby residential properties on High Green and the Brooke Conservation Area. Following statutory consultation, further Solar PV Arrays were removed entirely from the western part of Site 9 in response to the presence of Brooke Conservation Area to the north and residential properties on Mill Lane, Offsets and landscape buffers have been introduced along the southern Order Limits of Site 9 adjacent to Mill Lane to provide screening opportunities. The Applicant considers that Site 9 has been appropriately selected, assessed and designed, with residual matters addressed through the Environmental Statement and secured through the suite of outline management plans and Requirements in Schedule 2 of the **Draft DCO [AS-032]**. 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 **ES Volume 3,**

ID	Theme	Representation	Applicant's Response
			Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]. The Applicant has assessed the likely significant effects in the **ES [APP-042 to APP-056]** and outlined the measures taken to mitigate and minimise effects. The ecological, hydrological, heritage, socioeconomic and transport effects of the Scheme, including Site 9, are assessed within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**, **Chapter 9 – Water Environment [APP-045**], **Chapter 10 - Cultural Heritage [APP-046]**, **Chapter 14 – Socio-Economics [APP-050]**, and **Chapter 11 - Transport and Access [APP-047]** which conclude several significant beneficial residual effects, and no significant adverse residual effects as a result of the Scheme. The Applicant refers to its response to SPC-013 to SPC- 019 which addresses each of the environmental topics in further detail. 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

ID	Theme	Representation	Applicant's Response
			with the national policy statements (namely NPSs EN-1, EN-3 and EN-5). 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. 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.
BPC-021	Ecology and Biodiversity	Plot 9 Brooke The project is in excess of the allocated solar power output for the Region as defined by the National Energy System Operator (NESO) The site in Brooke overlaps roosting and feeding areas of at least 3 protected bat species.	**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 bats locally and also referenced material detailing the Core Sustenance Zones (CSZ's). The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [APP-213]** and illustrated in

ID	Theme	Representation	Applicant's Response
			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. Mitigation measures designed to avoid impacts upon bat species are detailed within **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]**.
BPC-022	Traffic and Access	The site in Brooke blocks access to a designated footpath.	The Public Rights of Way and Permissive Paths impacted by construction, operational and decommissioning phases are detailed within the **Outline PRoW and Permissive Paths Management Plan [APP-203]**. Brooke FP6 bisects Site 9, north to south, and is proposed to temporarily diverted via Littlebeck Lane. The PRoW will be reinstated for the operational phase and will follow the principles as set out in the **Design Principles, Parameters and Commitments [APP-213]**.
BPC-023	Cultural Heritage	The site is visible and impinges on Brooke Conservation Area.	The Applicant notes this comment and refers to its response to BPC-018.
BPC-024	Landscape and Visual	The site materially affects the visual landscape from a B&B premises.	The Applicants Landscape and Visual Assessment presented in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** has been

ID	Theme	Representation	Applicant's Response
			undertaken in accordance with the appropriate guidelines it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. With reference to the B&B premises this is assumed to be Brooke View Barns located on Mill Lane to the south of Site 9. The Scheme has excluded solar development within the fields located immediately north of the property to reduce potential adverse effects. The maximum development parameter for solar has been offset by ~100m from the property and the **Green Infrastructure Strategy [AS-005]** provides a range of proposed landscape and ecological measures including, strengthening/reinforcing

ID	Theme	Representation	Applicant's Response
			existing hedgerows (infill planting) and new tree planting which have been included to reduce adverse effects from this receptor.
BPC-025	Traffic and Access	There is no access for indivisible loads to the site through the village.	Section 7 of the **ES Volume 3, Appendix 11.1 - Transport Assessment** Part 1 **[APP-174]** details the AIL movements associated with the construction of the Scheme, including proposed routeing, mitigation and management measures. As detailed, potential AIL routes are proposed to be routed on B1332, through Brooke, although this is subject to detailed design and AIL specifications. Section 6.4 of the **Outline CTMP [APP-201]** provides a summary of AIL management measures, noting that all AIL movements will be managed by a specialist haulage contractor to ensure safety and compliance. The precise measures will be determined through detailed design and secured through the detailed CTMP, which will be developed in consultation with NCC as the Local Highway Authority, and approved pursuant to the Requirements of the **Draft DCO [AS-032**] prior to construction. An AIL report has also been prepared, and is detailed in Appendix D of the **ES Volume 3, Appendix 11.1 – Transport Assessment Part 3 [APP-176]** which includes a summary of routes and vehicle tracking to assess suitability for access.

ID	Theme	Representation	Applicant's Response
BPC-026	Socio-Economics	The site materially affects property prices in the whole village.	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 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

ID	Theme	Representation	Applicant's Response
			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.
BPC-027	Examination process	Brooke Parish Council is concerned that the amount of time that will be made available during the Examination period of this NSIP application for the preparation of its full written representation will be insufficient. The number of documents that must be studied and evaluated within this large application is huge, and incredibly repetitive, requiring a significant amount of time to actually find the relevant sections for our Parish.	The Applicant notes Brooke Parish Council's concerns regarding the Examination timetable and the resources available to voluntary bodies. The setting of the Examination timetable is a matter for the Examining Authority under section 88 of the Planning Act 2008. Interested Parties are able to raise comments on the Examination timetable at the Preliminary Meeting. The Applicant will continue to engage constructively with Parish Councils throughout the Examination process.
BPC-028	Examination process	It is essential that the examination timetable provides parish councils and voluntary organisations with enough time to research and prepare a thorough and full written representation. We rely on the voluntary efforts of councillors	The Applicant makes note of this and has provided a response under comment reference BPC-027.

ID	Theme	Representation	Applicant's Response
		and others to prepare our case and it will take these volunteers a considerable amount of time to undertake this task.	
BPC-029	Examination process	The Examination timetable will presumably be set out after the closure of the registration period on June 10th. Please ask the Inspectors to schedule a deadline date for the submission of written representations that at least provides us with a 4 to 5 month period to prepare our submission. It is important that The Planning Inspectorate is able to have sight of a comprehensive local case to judge any merits of the application.	The Applicant makes note of this and has provided a response to BPC-027.

2.5 Forncett Parish Council

Table 2.5 Applicant's Response to Forncett Parish Council [RR-0606]

ID	Theme	Representation	Applicant's Response
FPC-001	General	Forncett Parish Council wish to register as an Interested Party.	The Applicant welcomes continued engagement with Forncett Parish Council 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-036** 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.

2.6 Great Moulton Parish Council

Table 2.6 Applicant's Response to Great Moulton Parish Council [RR-0707]

ID	Theme	Representation	Applicant's Response
GMPC-001	General	The parish council would like to attend any hearings and make representations on their behalf.	The Applicant welcomes further engagement through the Examination process with Great Moulton Parish Council.

2.7 Hedenham Parish Meeting

Table 2.7 Applicant's Response to Hedenham Parish Meeting [RR-0740]

ID	Theme	Representation	Applicant's Response
HePC-001	Site Selection, Alternatives and Design Evolution Landscape and Visual	The Applicant's plans to develop a 'mega' solar farm (the Scheme) would result in the industrialisation of thousands of acres of South Norfolk countryside. Hedenham Parish sits at the eastern end of the proposed Scheme which east to west would cut a 15km swathe through the countryside to the Grid connection point near Great Moulton. No similar sized geographically dispersed solar farm has to date commenced construction. We are entering into the unknown.	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]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.9-3.2.10. The proposed management and mitigation measures set out in the **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 the **Policy Compliance Document [APP-210]**. The Applicant considers that the Scheme is in accordance with national energy policy,

ID	Theme	Representation	Applicant's Response
			national planning policy, and the relevant development plan when considered as a whole.
HePC-002	Impacts of the Scheme	The resultant harm caused to our heritage, our rural tranquillity, our local economy, the day to day lives and wellbeing of local residents together with the loss of valuable agricultural land and the threats to important wildlife habitats will be permanent regardless of the decommissioning promises made by East Pye.	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 practicable. The management plans that secure these measures are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032].** Each of these matters has been assessed within the Environmental Statement, as follows: heritage in **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**; rural tranquillity through the assessment of landscape character and perceptions of remoteness in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**, supported by the assessment of noise sensitive receptors in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**; the local economy and wellbeing in **ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** and **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]**; agricultural land in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**; and wildlife habitats in **ES Volume 1,**

ID	Theme	Representation	Applicant's Response
			Chapter 8 – Ecology and Biodiversity [APP-044]. Mitigation measures across these topics are secured through the suite of outline management plans and Requirements in Schedule 2 of the **Draft DCO [APP-017]**. The development is temporary as per NPS EN-3 paragraph 2.10.58 which states that Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed. 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]**. 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
HePC-003	General remarks	Hedenham Parish Meeting has been recognised by the Applicant throughout the NSIP planning process as a consultee notably since Site 10 encroaches over our Parish boundary. At our 2025 Parish Meeting an overwhelming majority of parishioners voted to oppose the Scheme. There is considerable concern and anguish about the negative impacts that it will have on our lives.	The Applicant notes this comment and has provided responses to the Parish Meeting under comment references HePC-04 to HePC-010.
HePC-04	Statement of Need	Principal amongst our objections are: 1. Solar power schemes are a highly inefficient means of generating electricity. Over the long term they are estimated to be only circa 10% efficient and it is unlikely that the stated peak generating capacity of 500MW will be achieved even under ideal conditions. A huge area of countryside including valuable agricultural land will be lost for minimal energy output. In context, the power generated, notwithstanding its intermittency, would be wholly insufficient to power a large AI data centre.	The NPS establish that there is a critical national priority for low carbon infrastructure, including for large-scale solar farms, because of the decarbonisation, energy security, and affordability benefits that they deliver. The UK has adequate irradiance levels for solar generation. A map of PV power potential in the UK is presented in the **Statement of Need [APP-206]**. The Scheme is located in an area with solar irradiance levels above average for the UK. As detailed in the **Statement of Need [APP-206]**, expected irradiance levels are just one factor in siting solar development. Solar has undergone significant technological advances in scale and commercial efficiency, and the UK has

ID	Theme	Representation	Applicant's Response
			many areas with an appropriate level of solar irradiance. Paragraphs 2.10.1 and 2.10.2 of NPS EN-3 state that "*The UK has huge potential for solar power: it is a cost-effective, versatile, and effective technology. Solar energy is at the heart of our Clean Power 2030 Mission*". Section 6.8 of the **Statement of Need [APP-206]** provides further support in its discussion on the efficiency and effectiveness of solar generation facilities. Solar panel efficiency is influenced by the physical properties of selected panels, panel orientations, layout and the electrical design of the Scheme. The Scheme will, if consented, generate a substantial quantity of low-cost, low-carbon and reliable energy in support of government's energy policy aims to ensure that the national energy system always remains secure, reliable, affordable, and low carbon. In addition to solar panels, the Scheme includes a BESS as associated development. The BESS would support the operation of the main solar scheme to increase the effectiveness of the energy generated by the solar panels by storing energy

ID	Theme	Representation	Applicant's Response
			when it is generated in abundance and releasing it to the grid when demand is higher.
HePC-0005	The Applicant	2. The Scheme may prove to be a 'goldmine' for the Applicant and local landowners but there are no material benefits for impacted residents.	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 electricity generated by the Scheme would be exported to the national grid, at which point it would cease to be under the Applicant's control and would instead be dispatched and distributed by the operator in accordance with supply and demand across the network. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements. The need and benefits of the Scheme are set out in the **Planning Statement [APP-209]** and in **Statement of Need [APP-206]**. 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

ID	Theme	Representation	Applicant's Response
			Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process).
HePC-006	Socio-Economics	Local businesses, notably those associated with our important tourism industry, will be detrimentally impacted both during the construction phase and throughout the operational phase. There are no specific proposals for appropriately compensating these businesses nor homeowners who will find their properties devalued and more difficult to sell.	**ES Volume 1 Chapter 14 - Socio-Economics [APP-050]** incudes an assessment on the economy and local and local businesses. The Applicant is committed to promoting innovation, employment and skills within the communities. Measures and partnerships are outlined in the **Outline ESSC [APP-205]**. The detailed ESSCS is secured through Requirement 19 of the **Draft DCO [AS-032]**. This will identify opportunities relating to skills, the supply chain and employment which the Applicant commits to progressing post- consent in accordance with the Outline ESSCS. These initiatives will help support local individuals and businesses in accessing the employment, skills, and supply chain benefits associated with the Scheme. The Applicant is also committed to the provision of new permissive paths and community accessible space, as set out in the **Design Principles, Parameters and Commitments [APP-213]** and the **Outline LEMP [APP-199]**.

ID	Theme	Representation	Applicant's Response
			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.
HePC-007	Ecology and Biodiversity	3. The Scheme would severely impact local wildlife, including barbastelle bat colonies, that flourishes in the local woodlands and hedgerows. The impacts of construction disturbance, habitat fragmentation, lighting and noise are intrinsic to the Scheme and cannot be reduced to a level that avoids adverse effects that can be satisfactorily mitigated. The Scheme is therefore fundamentally incompatible with the Habitat Regulations.	The bat activity surveys undertaken are reported in **ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157]** with an assessment in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]** where the colony in Little Wood and Spring Wood are considered. During the design process, the Cable Route Corridor was refined and move further away from Tyrells Wood as reasonably practicable. Minimum design offsets would be applied to watercourses, hedgerows, trees and woodland, as set out in

ID	Theme	Representation	Applicant's Response
			the **Design Principles, Parameters and Commitments [APP-213]**, which would protect opportunities for bat activity and foraging. The **Biodiversity Net Gain Report [APP-213]** and BNG secured though Requirement 9 of the **Draft DCO [AS-032**] will increase valuable habitats to foraging/commuting bats. Measures for the protection of roosting bats in trees are included in **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]**. Further mitigation measures are set out in the **Outline CEMP [APP-196],** the **Outline OEMP [APP-197]** and the **Outline LEMP [APP-199]**. The Outline LEMP sets out the long-term management of habitats that will benefit foraging and commuting bats, ensuring that the operational phase of the Scheme provides increased foraging resources for bat species; including local Barbastelle bats. Detailed management plans will be submitted to and approved in accordance with the relevant Requirements of the **Draft DCO [AS-032].**
HePC-008	Aviation (Seething)	4. There are significant safety issues with respect to Site 10 which intrudes into the Seething Airfield Safety Zone. Whilst these safety concerns have been partially addressed in the Applicant's	**Potential Impact on Seething Aerodrome Forced Landing Options [APP-223]** assesses Engine Failure After Take-off (EFATO) issues associated with the operation of Seething Airfield. Appropriate mitigation for this, namely the removal

ID	Theme	Representation	Applicant's Response
		submission (ref. APP 223) by reducing the expanse of solar PV panels in sub-Site 10B, this still leaves a large area covered in panels which would present a serious danger should a light airplane lose power when taking off from the airfield. For this reason alone, sub-Site 10B should be removed from the Scheme.	of solar arrays from Site 10B, has been built into the Scheme design as shown on Figure 7, in this document, which is an extract from **ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]** and which is also reflected in the **Works Plans [AS-002 and AS-003]**.
HePC-009	Transport and Access	5. The significant impacts on local residents of the construction phase have been downplayed. Two years of construction activity involving numerous HGV movements along narrow rural lanes will cause massive disruption. Harvey's Lane is a primary route for local traffic travelling to/from the B1332 to Norwich and already suffers from the passage of large tankers accessing the nearby biowaste lagoons. As a designated route for HGVs during the construction of Site 10 we can anticipate severe access issues including potential road closures for a prolonged period of time.	As stated within **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to APP-177]**, the peak daily trip generation associated with Site 10 (which is accessed via Harvey's Lane), is 7 HGVs and 26 cars/shuttles/LGVs. The percentage impact of this represents a 14% increase in total future baseline flows, and a 16% increase in HGV flows. These percentages do not exceed the thresholds identified in IEMA Guidance for where additional assessment should be undertaken. Further detail on the assessment of likely effects with respect to transport and access is shown in Section 8 of **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**. It is also noted (and stated within the above documents) that the peak daily traffic forecasts represent a worst-case scenario, and traffic flows on an average day will be lower. The Applicant

ID	Theme	Representation	Applicant's Response
			acknowledges that the two-year construction programme will result in some disruption. However, it should be noted that construction for each site will not be undertaken simultaneously, with activities being staggered across the programme. Site access design and swept-path analysis has also been undertaken, including accesses for Site 10, and are shown in Appendix C of the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]**.
HePC-010	Consultation and Engagement	6. There has been widespread disappointment at the consultation process with a strong sense of inevitability of the ultimate approval of the application and little sympathy shown for local residents. The consultation appears to have been a box ticking exercise focusing on producing reams of paperwork to cover the many NSIP requirements including desk driven impact analyses that play down the detrimental impacts of the proposed Scheme whilst claiming dubious benefits that will almost certainly never materialize.	The Applicant was required, under Section 49(2) of the Planning Act, to have regard to all relevant responses received during statutory consultation 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.

ID	Theme	Representation	Applicant's Response
			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]**.

2.8 Hempnall Parish Council

Table 2.8 Applicant's Response to Hempnall Parish Council [RR-0760]

ID	Theme	Representation	Applicant's Response
HPC-001	Sentiment	Hempnall Parish Councillors have voted unanimously to oppose the East Pye Application having held 2 public meetings attended by 100s of local residents all of whom indicated by show of hands that they opposed the scheme.	The Applicant notes this comment.
HPC-002	Landscape and Visual	The development would industrialise large areas within our parish and the surrounding villages, transforming attractive tranquil rural countryside into a landscape dominated by solar panels up to 4.5m in height, security fences and cameras, inverter buildings, new tracks and roadways and substations.	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 proposed implementation, management and monitoring of the landscape during construction

ID	Theme	Representation	Applicant's Response
			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]**. 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.
HPC-003	Site Selection, Alternatives and Design Evolution	This magnitude of negative change is unacceptable. The scheme stretches for over 15km from Great Moulton/Tivetshall to the southwest to Brooke/Seething to the northeast. Our village is located in the middle and would be completely surrounded by solar infrastructure. A large tract of South Norfolk Countryside would be altered for decades and its character destroyed.	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]**. The Applicant has assessed the likely significant effects in 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. The management plans, which will ensure impacts are kept to a minimum, are secured via the Requirements

ID	Theme	Representation	Applicant's Response
			contained within Schedule 2 to the **Draft DCO [AS-032].** These detailed management plans will be submitted to and approved by the relevant planning authority. The wider sustainability benefits delivered by the Scheme, which include low carbon electricity in support of Government's energy policy aims, green infrastructure and habitat creation, provision of permissive paths and community accessible space, job education and skills creation. 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.
HPC-004	Socio-Economics	This is a major concern not only for local residents but also for the numerous tourists who visit this area to enjoy the unspoilt countryside. Tourism in Norfolk generates £3b annually for the local economy.	**ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** provides an assessment on local tourism assets. The sensitivity of the tourism industry receptor is assessed as Medium, reflecting that the share of South Norfolk's employment in tourism is comparable to the regional level. No significant effect has been identified based on: • There being no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity

ID	Theme	Representation	Applicant's Response
			farm, for which any losses incurred by will be addressed through an agreed compensation arrangement; and • The potential for disruption during construction, but the countervailing potential for additional expenditure by the workforce to benefit the tourism industry. The Applicant is committed to promoting innovation, employment and skills within the communities. Measures and partnerships are outlined in the **Outline ESSCS (ESSCS) [APP-205]**. The detailed ESSCS is secured through Requirement 19 of the **Draft DCO [AS-032]**. This will identify opportunities relating to skills, the supply chain and employment which the Applicant commits to progressing post-consent in accordance with the Outline ESSCS. These initiatives will help support local individuals and businesses in accessing the employment, skills, and supply chain benefits associated with the Scheme.
HPC-005	Site Selection, Alternatives and Design Evolution	Our countryside and landscape are a precious national asset enjoyed by visitors and locals alike. It should be treasured and protected and not sacrificed in pursuit of a net zero solar target that can be achieved via a	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

ID	Theme	Representation	Applicant's Response
		different approach. Research by UCL for CPRE demonstrates that 117GW of solar energy is obtainable from roofs and artificial surfaces by 2050.	and commercial users. Paragraphs 6.3.21 – 6.3.22 state *'Installation rates would need to reach and sustain an even higher level to meet the top of government's capacity range of 45GW to 47GW of solar by 2030 (Ref. 4, Connections Reform Annex (updated), Table 1) from microgeneration alone.* *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 in order 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.'*
HPC-006	Traffic and Access	Users of the numerous well used public rights of way cross the site area would suffer severe impacts to their enjoyment of the countryside. We calculate that over 30km of PROWs would be directly affected if the scheme was permitted. A large number of minor roads used by cyclists, walkers, joggers and horse riders would also be negatively impacted.	A 15m buffer to PRoW/bridleways has been incorporated into the design of the Scheme, as secured through the **Design Principles, Parameters and Commitments [APP-213]**. **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** consider fear and intimidation on non-motorised users on roads, which includes horse riders. Measures to manage traffic and access are provided in the **Outline CEMP [APP-196]**, **Outline CTMP [APP-201], Outline OEMP [APP-**

ID	Theme	Representation	Applicant's Response
			197] and **Outline OTMP [APP-202].** An **Outline PRoWPPMP [APP-203]** has also been prepared which provides an assessment of PRoW and permissive paths, including bridleways, during construction, operational, and decommissioning phases. The PRoW management measures will be developed further in the detailed PRoWPPMP to be secured by Requirement 17 of the **Draft DCO [AS-032]**. The PRoW Visual Amenity Assessment included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]** considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources. The assessment demonstrates that whilst construction and early operation phases will result in significant visual effects for many PRoW, the implementation of robust mitigation measures will substantially reduce these effects over time. By year 15, most PRoW will experience only slight or negligible changes, with the significance of effects generally falling below the threshold of significance.
HPC-007	Ecology and Biodiversity	The scheme would cause extensive and, in several respects, unmitigable harm to protected species including	Effects on ecology, including barbastelle bats, Ancient Woodland and SSSI-linked habitats, are

ID	Theme	Representation	Applicant's Response
		Barbastelle bats, chalk-stream ecology, ancient woodland and SSSI-linked habitats,	assessed in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**, and effects on European sites are addressed in the **Shadow Habitats Regulations Assessment [AS-036]**. The River Tas, which has been identified as a chalk-stream is assessed in **ES Volume 1**, **Chapter 8 – Ecology and Biodiversity [APP-044]** and **ES Volume 1, Chapter 9 – Water Environment [APP-045].** Mitigation measures have been embedded into the design of the Scheme to avoid and reduce environmental impacts and are set out in the various management plans, including the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197] Outline LEMP [APP-199]** and the **Outline Protected Species Mitigation Strategy [APP-161]**, secured by Requirements in Schedule 2 of the **Draft DCO [AS-032]**. The Scheme applies the mitigation hierarchy through avoidance (buffers to ancient woodland and sensitive habitats), minimisation (design measures including dark corridors and lighting controls), and compensation (habitat creation and management), delivering a minimum 10%

ID	Theme	Representation	Applicant's Response
			Biodiversity Net Gain as set out in the **Biodiversity Net Gain Report [APP-218]**. With mitigation in place, no significant adverse effects have been identified. Long-term habitat enhancements and management informed by the **Outline LEMP [APP-199]** would have beneficial effects on breeding birds, bats, badgers and riparian mammals during the operation of the Scheme.
HPC-008	Cultural Heritage Soils and Agricultural Land Traffic and Access	designated and non-designated heritage assets, including churches, listed buildings and conservation areas, best and most versatile agricultural land, rural communities, public rights of way, landscape character and local infrastructure.	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. 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]**. **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

ID	Theme	Representation	Applicant's Response
			rural economy, including consideration of the economic and other benefits of BMV land, in accordance with planning policy. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043].** The assessment has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The Applicant acknowledges the Scheme would introduce a series of new features into the rural landscape however the Applicant considers at worst this would result in moderate adverse effects in the long term which are reversible as reported in **ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120],** and **ES Volume 3, Appendix 7.3 – Visual Assessment Tables [APP-147]**. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built

ID	Theme	Representation	Applicant's Response
			elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects.
HPC-009	Statement of Need Planning, Policy Compliance	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	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. Para 4.3.9 of NPS EN-1 states *'As in any planning case, the relevance or otherwise to the decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective.'* Consent should not be refused simply due to the presence of other 'less harmful' alternative sites. Notwithstanding, the Applicant has considered reasonable alternatives, as set out in the **Site Selection Assessment [APP-215]** and **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041].**

ID	Theme	Representation	Applicant's Response
		targets are met or exceeded by existing, consented and pipeline projects, and that general claims about "optionality" or attrition do not justify severe harm in a highly sensitive landscape.	Management and mitigation measures, specific to the location and Scheme, are secured through the various outline management plans **[APP-196** to **APP-205]**. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032].** 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

ID	Theme	Representation	Applicant's Response
			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 maximise the benefits arising from the Scheme is aligned with the government's energy policy.

ID	Theme	Representation	Applicant's Response
			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 adverse impacts identified for the Scheme are clearly outweighed by the substantial benefits that would arise from providing low carbon energy to meet the needs identified in NPS EN-1, together with other benefits, such as green infrastructure and habitat creation, provision of permissive paths and community accessible space, job education and skills creation, as set out in the **Planning Statement [APP-209].**
HPC-010	Planning, Policy Compliance	In our written representation during the examination phase, Hempnall Parish Council will provide greater detail on how the scheme contradicts policies and assessments made in local and national planning documents including the NPPF, the Greater Norwich Local Plan (GNLP) approved by PINS, South Norfolk Council landscape character assessments and sensitivity studies on the location of renewable energy projects including solar.	The Applicant notes the Parish Council's intention to provide further detail in written representations. The Applicant welcomes further engagement through the Examination process. The **Planning Statement [APP-209]** and **Policy Compliance Document [APP-210]** set out the Scheme's compliance with the National Policy Statements EN-1, EN-3 and EN-5, the NPPF, and the relevant development plan policies. The ES, at **Volume 1 [APP-037 – APP-056]** and **Volume 3 Appendix 2.3 – Legislation, Planning Policy and Guidance [APP-115]** also set out and consider

ID	Theme	Representation	Applicant's Response
			relevant national and local planning policy relative to the Scheme.
HPC-011	Examination process	Hempnall Parish Council is seriously concerned about the possibility that the amount of time that will be made available during the Examination period of this NSIP application for the preparation of its full written representation will be insufficient. The number of documents that must be studied and evaluated within this large application is huge.	The Applicant notes the Parish Council's concerns regarding the Examination timetable and the resources available to voluntary bodies. The setting of the Examination timetable is a matter for the Examining Authority under section 88 of the Planning Act 2008. Interested Parties are able to raise comments on the Examination timetable at the Preliminary Meeting. The Applicant will continue to engage constructively with Parish Councils throughout the Examination process.
HPC-012	Examination process	It is essential that the examination timetable provides parish councils and voluntary organisations with enough time to research and prepare a thorough and full written representation. Unlike the applicant we cannot afford to hire a wide range of experts to prepare our documentation, papers and maps. We rely on the voluntary efforts of councillors and others to prepare our case and it will take these volunteers a considerable amount of time to undertake this enormous task.	
HPC-013	Examination process	The Examination timetable will presumably be set out after the closure	

ID	Theme	Representation	Applicant's Response
		of the registration period on June 10th. Please ask the Inspectors to schedule a deadline date for the submission of written representations that at least provides us with a 4 to 5 month period (after June 10th) to prepare our submission - especially as this period will include the Summer holiday months of July and August.	

2.9 Kirstead Parish Meeting

Table 2.9 Applicant's Response to Kirstead Parish Meeting [RR-1094]

ID	Theme	Representation	Applicant's Response
KPM-001	Landscape and Visual	The village unanimously oppose E.P.S. It disregards all existing planning guidelines, industrialising a rural landscape and removing valuable productive farmland.	The Applicant has assessed the likely significant effects in the **ES [APP-042 to APP-056]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032].** Effects on agricultural land are assessed in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**, supported by **ES Volume 3, Appendix 15.1 – Agricultural Land Classification [APP-182]** and **ES Volume 3, Appendix 15.2 – Farm Reports [APP-183]**. The Scheme is temporary and reversible, with the land beneath and between arrays capable of continued agricultural use including sheep grazing. 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

ID	Theme	Representation	Applicant's Response
			national priority for the Scheme as set out in Government policy.
KPM-002	Community Impact Wildlife impacts	It will have no local benefit but will cause considerable distress to residents and wildlife.	Efforts to provide specific benefits in locally impacted communities are set out in the Outline **ESSCS [APP-205]** for employment and economy 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 electricity generated by the Scheme would be exported to the national grid, at which point it would cease to be under the Applicant's control and would instead be dispatched and distributed by the operator in accordance with supply and demand across the network. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements. The need and benefits of the Scheme are set out in the **Planning Statement [APP-209]** and in the **Statement of Need [APP-206].** 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

ID	Theme	Representation	Applicant's Response
			Applicant and is not required to mitigate the impacts of the Scheme – the Community Benefit Fund operates (and is to be agreed) entirely outside of the DCO process (it cannot be considered as part of the decision-making process).

2.10 Long Stratton Town Council

Table 2.10 Applicant's Response to Long Stratton Town Council [RR-1165]

ID	Theme	Representation	Applicant's Response
LSTC-001	Consultation and Engagement	The Town Council has serious concerns regarding the lack of a statutory consultee with the fire service.	The Applicant has engaged with the Norfolk Fire and Rescue Service (NFRS), including in relation to the illustrative layout of the BESS (presented at Appendix A of the **Outline BSMP [APP-200]**); and safety measures. The Applicant has complied with the National Fire Chiefs Council (NFCC) guidelines and will ensure that the Battery Safety Management Plan (BSMP) accounts for any subsequent revisions made to NFCC guidelines, as set out in the **Outline BSMP [APP-200]**. Requirement 6 of the **Draft DCO [AS-032]** also requires the relevant planning authority to consult with NFRS (and the Environment Agency (EA)) before determining an application for approval of the BSMP. This ensures that NFRS remain appropriately engaged at the time of discharge too. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally.

ID	Theme	Representation	Applicant's Response
LSTC-002	BESS Safety	The BESS units will be placed near to Long Stratton and we currently have approx. 4000 residents and we have been earmarked for a large housing development which could see the Town grow to having 12,000 residents. In the event of a fire at the battery storage units, Long Stratton will be within the 6km evacuation radius. Where will all the residents be expected to go, who will assist the vulnerable? Who will assist the vulnerable if no one knows they are vulnerable.	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 **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 described in the **Outline BSMP [APP-200]**, the BESS Site will have a robust and validated emergency plan, developed in consultation with NFRS. An Emergency Response Plan will be developed post DCO consent to facilitate effective and safe emergency response. This will follow the NFCC and National Fire Protection Association guidelines. Pursuant to 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 the with NFRS and the EA. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally.

ID	Theme	Representation	Applicant's Response
LSTC-003	Other Environmental Matters	In addition to this, house insurance will not cover this type of disaster leaving our community with housing damage in the event of this happening without any means to financially rectify the damage. The impact that this would have if a fire was to occur is massive and therefore the lack of engagement with the fire service, the professional in risk assessing the threat of a fire, as a statutory consultee is negligent to the local community of which as a Town Council we represent.	The Applicant refers to the response under row LSTC-001 regarding engagement with the NFRS 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 **Outline BSMP [APP-200]** covers all key BESS failure safety issues, namely fire risks, explosion risks, and fire emission risks. The **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. The safety objectives for the design of the BESS are listed in Section 1.4 of the **Outline BSMP [APP-200]**. Section 1.4.2 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*

ID	Theme	Representation	Applicant's Response
			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); • *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 comprehensive site operations and emergency response safety audit. This is stipulated in the **Outline BSMP [APP-200]** pre-construction requirements (Section 5). This will ensure that there is clear evidence that the impacts of credible BESS fire scenarios are safely

ID	Theme	Representation	Applicant's Response
			contained within the BESS Site and there is no fire risk to any residential receptor's property. Pursuant to 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 the with NFRS and the EA. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally.

2.11 Morningthorpe and Fritton Parish Council

Table 2.11 Applicant's Response to Morningthorpe and Fritton Parish Council [RR-1373]

ID	Theme	Representation	Applicant's Response
MFPC-001	General	Morningthorpe and Fritton Parish Council objects to the project in its entirety and specifically Site 5. This will have a severe detrimental, irreversible impact on the important environmental and biodiversity of this nationally recognised site.	The likely effects on ecology and biodiversity at Site 5 as part of the Scheme are assessed in **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 or mitigate for potential significant environmental effects identified throughout 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]** Site 5 is not located within any national designations. The **Biodiversity Net Gain Report [APP-218]** demonstrates that the Scheme is able to deliver the BNG. A minimum of 10% BNG in

ID	Theme	Representation	Applicant's Response
			habitat units, a minimum of 10% BNG in hedgerow units and a minimum of 10% BNG in watercourse units across the Scheme is secured by Requirement 9 of the **Draft DCO [AS-032]**.
MFPC-002	Human Health	The wellbeing of the local community will be severely impacted during the construction and subsequent irreversible lasting legacy, completely detrimentally changing the area to an industrialised site.	The wellbeing of the local community during construction has been considered in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054].** The Health Summary Statement provided therein considers how a range of environmental and social determinants, including transport and access, noise, air quality, PRoW, socio-economics, and landscape and visual effects, may influence human health and wellbeing. Mental health has also been considered, as presented in the **Equality Impact Assessment [APP-214].** As part of the assessment, appropriate mitigation measures have been developed and are incorporated into the Scheme. Measures are secured in the **Outline CEMP [APP-196]**, **Outline CTMP [APP-201]** and the **Outline PRoWPPMP [APP-203]**. With specific regard to community liaison, this is directly secured through Requirement 4 of the Draft DCO **[AS-032]** through the provision of a community liaison group. This group will act as an

ID	Theme	Representation	Applicant's Response
			intermediary between the public and the construction contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required
MFPC-003	Statement of Need	Justification for this development is based on national need not local. No valid justification for Site 5 which heavily impacts on our community has been given. Regional solar capacity requirements are already met.	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

ID	Theme	Representation	Applicant's Response
			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 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

ID	Theme	Representation	Applicant's Response
			benefits arising from the Scheme from available and suitable land and through its contracted grid connection. The 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, including Site 5, is therefore justified as going towards meeting the need established in NPS EN-1. The wider benefits of the Scheme are given in the **Planning Statement [APP-209]**. In reference to the selection of Site 5, the **Site Selection Assessment [APP-215]** documents the site selection and design evolution process, in accordance with paragraphs 2.10.10 to 2.10.40 of NPS EN-3. Site 5 is not located within any national or local designations. The design evolution of Site 5, as summarised in the **Design Approach Document [APP-212]**, has sought to avoid and/or reduce environmental impacts as far as practicable. This has included setting back Solar PV Arrays in Sub-Site 5B, the exclusion of the south-eastern area of Sub-Site 5B from Solar PV Arrays owing to proximity to the Grade I Church of St Catherine, Fritton Conservation Area, Grade II listed buildings and residential properties along The Street, with a further field in the eastern part of

ID	Theme	Representation	Applicant's Response
			Sub-Site 5B subsequently removed to provide a greater offset to residential properties following landscape and visual analysis and consultation feedback. The identified benefits and adverse effects are set out in the **Planning Statement [APP-209].**
MFPC-004	Site Selection, Alternatives and Design Evolution	It's the wrong setting for a huge 400kV substation and associated building. It will industrialise this rural community.	The Applicant acknowledges that the Scheme would introduce changes to the landscape character and views. The Project Substation has been sensitively sited centrally within Site 5 maximising the screening benefits of existing vegetation and maximising the setbacks from a number of receptors including local PRoW, residential properties and heritage receptors. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. A **Green Infrastructure Strategy [AS-005]** has been developed which includes a combination of new hedgerow with trees, tree planting and hedgerow improvements to respond to existing characteristic features and aid visual screening of the Scheme. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the

ID	Theme	Representation	Applicant's Response
			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 **Design Principles, Parameters and Commitments [APP-213]** includes a commitment for the 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.
MFPC-005	Arboriculture	Site 5 is part of the Countryside Stewardship Scheme (Tier 2), Climate Change Vulnerability Buffer area, Woodland Core Area, Woodland Improvement Area and a Network Expansion Zone 2 in the National Habitat Network. Woodland Trust has identified numerous Veteran and Notable trees with numerous TPO's and Important Hedgerows identified. This development would remove it from these important biodiversity schemes.	**ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** includes an assessment of important ecological features; including priority habitats. Ancient woodland, veteran trees and hedgerows have been considered during the design process for the Scheme. Minimum design offsets would be applied to these features, as set out in the **Design Principles, Parameters and Commitments [APP-213].** Further information regarding the

ID	Theme	Representation	Applicant's Response
			creation of habitats within the Scheme is provided within 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]**. The **Biodiversity Net Gain Report [APP-218]** describes adherence to the biodiversity gain hierarchy and habitat baseline values. The BNG assessment has been calculated on the basis the existing habitat management and land uses identified within the baseline remain in place, notwithstanding that some of the relevant environmental and land management schemes are subject to time-limited agreements. Post-construction values are provided within the **Biodiversity Net Gain Statutory Metric [APP-219]**. BNG is secured through Requirement 9 of the **Draft DCO [AS-032]**. It is considered by the Applicant that the biodiversity gain hierarchy has been correctly applied in relation to the Scheme and the BNG assessment. No tree works in respect to TPO and Conservation Areas trees are identified in **ES Volume 3, Appendix 7.10 - Preliminary Arboricultural Impact Assessment [APP-150].**

ID	Theme	Representation	Applicant's Response
MFPC-006	Ecology and Biodiversity	It is the site of Red Listed Species including Skylarks, Lapwings, Mistle Thrushes, 8 species of bats and badgers. Mitigations for these species are based on limited or no evidence of success.	**ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** includes an assessment of important ecological features; including all breeding birds recorded on site (including skylark), bats and badgers. Ecological protection and mitigation measures for these species and species groups are set within **ES Volume 3, Appendix 8.10 – Outline PSMS [APP-161]**, which has been informed by desk-based studies and ecological surveys undertaken between May 2024 and January 2026 **ES Volume 3, Appendix 8.10 – Outline PSMS [APP-161]** 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 principles set out within the **ES Volume 3, Appendix 8.10 – Outline PSMS [APP-161]**, will be submitted to and approved by the relevant planning authority pursuant to Requirement 8 of the **Draft DCO [AS-032]**. Mitigation and management measures for the operational phase of the Scheme are detailed within the **Outline LEMP [APP-199].** A detailed LEMP, substantially in accordance with the **Outline LEMP [APP-199]**, will be submitted to and

ID	Theme	Representation	Applicant's Response
			approved by the relevant planning authority pursuant to Requirement 7 of the **Draft DCO [AS-032]**. Proposed mitigation is based on standard industry approaches, with a high certainty of success, and with measures in place to manage and monitor.
MFPC-007	Transport and Access	The applicant hasn't demonstrated a clear means to access Site 5 with the stated 317 tonne, 69.6m long AILs needed. Proposed access points are currently either opposite the drive to a busy children's nursery or over a historic brick culverted stream that flows into the River Tas – a Chalk Stream. The Street is an unclassified road which the applicant proposes to use for HGV access.	**ES Volume 1, Chapter 11 – Traffic and Access [APP-043]** and **ES Volume 3, Transport Assessment [APP-174** to **APP-177]** present an assessment of the Scheme on traffic and access, with the proposed construction routes and access points shown in the **Outline CTMP [APP-201]**. Site 5 would be accessed via B1527 and The Street. The Applicant is aware of the location of the children's nursery to the north of Site 5, and this has been considered within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**. Regarding the historic brick culverted stream, the Applicant is liaising with NCC as the Local Highway Authority regarding its location and status. However, it is confirmed that there are currently no weight restrictions present on B1527 or The Street in the vicinity of Site 5 which would impact suitability for access by HGVs. The Applicant has liaised with NCC highways team with regards to a historic brick culverted stream. NCC has confirmed three structures on B1527

ID	Theme	Representation	Applicant's Response
			between A140 and The Street and has confirmed that all assets are in good condition and are capable of carrying normal traffic and traffic up to 40/44 tonnes. Management and mitigation measures are set out within the **Outline CTMP [APP-201]** to minimise effects, including those to Site 5 and taking into account the children's nursery. This includes measures such as a delivery scheduling and monitoring system, and the use of waiting points and call forward to proactively manage construction vehicle movements. Construction deliveries and collections will also be scheduled to avoid peak traffic periods, which will reduce effects associated with the children's nursery by avoiding conflicts between HGVs and general traffic accessing the nursery during peak traffic periods. The site access design, visibility splays and swept-path analysis detailed within the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **177]** has been informed by the local characteristics, including the location of the children's nursery, and appropriate visibility splays are included to ensure the safe access of construction vehicles. An AIL report has been prepared alongside access drawings, visibility splays and swept-path analysis,

ID	Theme	Representation	Applicant's Response
			which are included in **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **177]**. AIL movements 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 AIL movements will be undertaken using strict traffic management and notification of these types of movements will be communicated in advance.
MFPC-008	Ecology and Biodiversity	The Order Limit has been identified as an area of National Importance for Bats. Site 5 is crucial for rare Barbastelle bats.	The bat activity surveys undertaken for the Scheme are reported in **ES Volume 3, Appendix 8.6 – Bat Activity Survey Report [APP-157]** with an assessment of the likely significant effects set out in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. This confirms that roosting and foraging/commuting barbastelle bats are of National importance, and that subject to secured avoidance and mitigation measures there will be no likely significant effects to barbastelle bats. Measures for the protection of roosting bats in trees are included in **ES Volume 3, Appendix 8.10 – Outline Protected Species Mitigation Strategy [APP-161]**. Further mitigation measures are set out in the **Outline CEMP [APP-196], Outline**

ID	Theme	Representation	Applicant's Response
			OEMP [APP-197] and **Outline LEMP [APP-199]**. The Outline LEMP sets out the long-term management of habitats that will benefit foraging and commuting bats; ensuring that the operational phase of the Scheme provides increased foraging resources for bat species; including local Barbastelle bats. Detailed management plans will be submitted to and approved in accordance with the relevant Requirements of the **Draft DCO [AS-032]**.
MFPC-009	Lighting	The 400kv Substation would introduce a permanent light source in a Rural Dark Skies area.	Measures to minimise and control lighting from the Scheme are described in **ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]** with lighting control measures secured in the **Outline CEMP [APP-196]** and **Outline OEMP [APP-197]**. As detailed in **ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151],** all external lighting at the Project Substations will be motion sensitive. Once movement ceases, the lights will remain on for a short, but appropriate period of time, to ensure personnel have sufficient time to move safely without the sudden loss of illumination. After this period has ended, the lights will switch off completely. Lighting for the entrances to the Control Rooms, offices and welfare facilities associated with the Project Substations will be designed to emit no

ID	Theme	Representation	Applicant's Response
			upward light, and exposed light sources should be avoided to minimise glare and prevent unnecessary light spill beyond the intended area. Any components that are external will be illuminated either by the compound perimeter lighting or via temporary portable lights. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** considers that the Scheme would not result in any significant effects through additional lighting. **ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]** provides a strategy and commitments for control and minimising effects of lighting, as part of an embedded mitigation measure. The Lighting Strategy is secured by the **Outline OEMP [APP-197]**.
MFPC-010	Water Environment – Water Quality, Drainage and Flood Risk	Applicant has downgraded the stream feeding directly into the highly sensitive chalk-stream (Tas) in the West of Site 5 to a drainage ditch, with the stream on the Eastern boundary feeding into the River Tas via Hempnall Beck, it makes this site intrinsically linked hydrologically and any development here poses a high risk of contamination.	The Applicant notes this comment and has acknowledged the hydrological linkage between Site 5 and the River Tas/Hempnall Beck within **ES Volume 3: Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]**. The River Tas and Hempnall Beck as receptors are identified as the 'main river' channel and principal ordinary watercourse tributaries (e.g. adjacent to Sub-Site 4A and Sub-Site 5B within **E**S **Volume 1: Chapter 9 – Water Environment**

ID	Theme	Representation	Applicant's Response
			[APP-045]. This would include the ordinary watercourse identified by the consultee that flows through the western part of Sub-Site 5B directly into the Hempnall Beck and therefore it would fall under the 'Very High' sensitivity category. The watercourse identified by the consultee has therefore not been downgraded. Notwithstanding this, embedded mitigation for the management of pollution risk to receptors (leaks/spills/contaminants in surface water runoff), including the River Tas is secured within the **Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]**. The surface water drainage strategy for the Project Substation within Site 5 incorporates a system lined with an impermeable membrane to prevent the infiltration of runoff to the strata beneath in these areas as secured within the **Outline OEMP [APP-197]**. The detailed surface water drainage design is secured through DCO Requirement 11. The Assessment of Likely Effects (Section 9.8 of **ES Volume 1, Chapter 9 – Water Environment [APP-045]**) sets out the worst case scenario based on the highest receptor sensitivity for the impact (for most receptors this is 'Very High' sensitivity'), and due to the embedded mitigation measures to

ID	Theme	Representation	Applicant's Response
			be implemented for the Scheme as set out in Section 9.7 of the chapter, the effects are considered as 'Not Significant', with the exception of the cessation of agricultural use/chemicals which is assessed as 'Major Significant Beneficial'.
MFPC-011	Water Environment – Water Resources, Demand and Supply	Insufficient modelling has been performed to ascertain the true impact on Private Water Supplies, Private Sewerage and the highly sensitive River Tas and therefore this project poses a significant risk to public health.	The Applicant has identified private water supplies (PWS) as a receptor within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. With the incorporation of embedded mitigation as set out within Section 9.7 of the Chapter, the effects on these receptors would be considered as 'Not Significant' Embedded mitigation for the management of pollution risk to receptors (leaks/ spills/ contaminants in surface water runoff), including private water supplies and the River Tas 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.

ID	Theme	Representation	Applicant's Response
			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]**. Sources of Potential Contamination (SPCs) that could be mobilised by the construction of the Scheme have not been identified within Site 5, as shown on **ES Volume 2**, **Figure 16.3 – Sources of Potential Contamination [APP-107]**. As shown in the **ES Volume 3: Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184** to **APP-186]**, where borehole logs are available, and where information has been provided during consultations, the active abstractions within the Site 5 Study Areas are (or are assumed, based on the geology) to extract water from the chalk or the crag at depths in excess of 20m below ground level. The geology overlying the chalk in this area comprises Diamicton, which is predominantly cohesive and as shown on **ES Volume 2, Figure 16.4 - Diamicton Thickness [APP-108]** extends to a in excess of 6m in Site 5. It is recognised that the composition of Diamicton can be variable, however a laterally or

ID	Theme	Representation	Applicant's Response
			vertically extensive groundwater body is not anticipated to be present. Nonetheless, ground investigation will be undertaken prior to construction to confirm the assumptions made. The **Outline CEMP [APP-196]** includes ground investigation as a mitigation measure and states that "*The results of the ground investigation will be used to inform the detailed design of the Scheme*". 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 incorporate appropriate drainage systems and pollution management measures have been specified and secured within the **Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198]**. As such, the elements of the Scheme proposed within Site 5 will not give rise to significant contamination effects on water receptors, including private water supplies. Risks (and consequently,

ID	Theme	Representation	Applicant's Response
			impacts) to private water supplies within the Study Area around Site 5 have not been identified as: • The private water supplies abstract from the chalk or crag at depth beneath the overlying Diamicton. • Ground investigation will be undertaken, with the design of the Scheme informed by the results of the ground investigation • SPC which could be mobilised by ground disturbance during construction of the Scheme in Site 5, have not been identified.
MFPC-012	Ecology and Biodiversity	A breeding colony of White Clawed Crayfish (WCC) recorded by NRT in the Tas is a Red List species that the applicant is not providing mitigation for.	No records of white-clawed crayfish have been identified within the Order Limits. Habitat suitability survey for White Clawed Crayfish was undertaken with the findings in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and **ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160]**. Measures to control pollution to watercourses are set out in the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]** and are secured through Requirements 13, 14 and 21 of the **Draft DCO [AS-032]**.

ID	Theme	Representation	Applicant's Response
			The **Design Principles, Parameters and Commitments [APP-213]** sets out the minimum offset distances within the design for main rivers and watercourses. Where cables cross main rivers, the Applicant is also committed to a minimum cable depth beneath main rivers of 5m below the surveyed bed of main rivers, as secured through the **Design Principles, Parameters and Commitments [APP-213]**. The associated launch and reception pits for trenchless crossings will be located at least 10 m from main rivers, watercourses or ditches. Together, these measures retain construction activity outside the Avoidance Areas and avoid direct disturbance to the channel bed and banks, thereby removing the principal direct impact pathway to white-clawed crayfish and their habitat. They also reduce the potential for sediment, pollutants or construction materials to enter hydrologically connected watercourses. The River Tas and Hempnall Beck are identified as sensitive aquatic receptors and Avoidance Areas. At these locations, open-cut trenching and the launch and reception pits associated with trenchless techniques will be located outside the Avoidance Areas. The embedded design therefore protects potential white-clawed crayfish habitat within these watercourses, should the species be

ID	Theme	Representation	Applicant's Response
			present, while pollution prevention measures secured through the **Outline CEMP [APP-196]** further reduce the risk of indirect downstream effects. Notwithstanding, the Applicant notes the Examining Authority's (ExA) request for further information and potentially for surveys to be carried out for White Clawed Crayfish between July – September, in the **Rule 6 letter [PD-005]**. The Applicant will provide an update on this at **Procedural Deadline A** as set out in the document **Applicant's Position on White Clawed Crayfish [EN0110014/EXAM/8.5]**.
MFPC-013	Cultural Heritage	With 300+ Listed buildings in the Zone of Influence, this area is of national importance for pre-1750 rural architecture.	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]** which considered all relevant receptors and the effects upon them have been appropriately taken account of in the assessment.
MFPC-014	Cultural Heritage	Height of the 400kV substation negatively impacts adjoining St Catherine's Church (Grade I), Church Farm (Grade II) and Fritton Conservation Area.	The Applicant refers to the response under reference code MFPC-004. In addition, an assessment of likely effects to Fritton Conservation Area, the Grade I listed Church of St Catherine and the Grade II listed

ID	Theme	Representation	Applicant's Response
			buildings at Church Farm are included in **ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 – APP-168].** The assessment has concluded that based on the existing environmental baseline, as well as the proposed landscape mitigation, the Scheme will result in no likely significant effects to these heritage assets.
MFPC-015	Consultation and Engagement	As the DCO submission is so large and difficult to navigate with inconsistencies there will be more points of objection raised as a written submission.	The Applicant continues to ensure that all Application documents are made available to those with limited access to computers. 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 have been published on the Applicant's website. The 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 sticks were available to be sent directly to individuals upon request.

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			The Applicant's **Section 56 Notice [OD-003]** provided further information on obtaining Application documents. The Applicant will continue to engage with Morningthorpe and Fritton Parish Councill throughout the Examination process.

2.12 Saxlingham Nethergate Parish Council

Table 2.12 Applicant's Response to Saxlingham Nethergate Parish Council [RR-1745]

ID	Theme	Representation	Applicant's Response
SNPC-001	Cultural Heritage Lands	The Parish Council strongly objects to the proposal. The full details for objection are set out in a separate document, which will be submitted by email. In relation to the proposals affecting our village, we have the strongest possible objection to the proposal to compulsorily purchase of parts of the curtilages of the War Memorial, a Grade II listed structure, and the Old Rectory, a Grade II* listed building designed by Sir John Soane. The purpose of this acquisition is to facilitate the transportation of the abnormal indivisible loads (AILs) and would result in the removal of a listed wall, fence and established hedge along Church Hill and alteration to the setting of the War Memorial. Such actions would constitute a serious and unjustified intrusion into the historic environment, causing substantial harm	The Applicant notes the concerns raised by Saxlingham Nethergate Parish Council regarding parts of the curtilages of the Saxlingham Nethergate War Memorial and The Old Rectory, Saxlingham Nethergate. 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 are within the scope of the Scheme. 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

ID	Theme	Representation	Applicant's Response
		to the setting of both listed assets and to the character and appearance of the conservation area. The proposal to acquire land from the War Memorial site, which has recently been enhanced through the installation of a pictorial plaque commemorating the fallen, is deeply concerning to our community. It would have a significant adverse impact on the heart of our conservation area, one of only six conservation areas originally designated by the former Norfolk County Council prior to 1974.	Rectory, for 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 a detailed CTMP, which must be approved by the relevant planning authority in consultation with the relevant highway authority and substantially in accordance with the **Outline CTMP [APP-201],** to ensure the protection of nearby assets, including the War Memorial and The Old Rectory.
SNPC-002	Transport and Access	The proposed compulsory acquisition of land from both the Old Rectory and the War Memorial clearly demonstrates the unsuitability of Church Hill as part of the AIL access route. Furthermore, no apparent consideration has been given to the potential impact of AIL vehicle movements on the numerous utility services and pipelines located beneath The Street and Church Hill. The Parish Council is also concerned that the weight and vibration associated	As noted in the response to SNPC-001 above, no powers of compulsory acquisition or acquisition of rights are being sought over either property as neither title are within the scope of the proposed development works. The Applicant notes the concerns raised regarding the proposed AIL routes and potential effects on local infrastructure. The assessment of AIL movements is set out within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, and **ES Volume 3, Appendix 11.1 - Transport Assessment**

ID	Theme	Representation	Applicant's Response
		with AIL traffic could damage the culvert wall running alongside The Street, potentially compromising its structural integrity and increasing the risk of drainage and flooding problems.	**[APP-174** to **APP-177]** which includes an AIL report in Appendix D. As set out in the **Outline CTMP [APP-201]**, AIL movements would be managed by specialist haulage contractors and would be subject to detailed planning and agreed with the relevant authorities prior to movement. The Applicant also notes that based on traffic data obtained at ATC6 and ATC7 and reported within **ES Volume 1, Chapter 11 - Transport and Access [APP-047],** a number of rigid vehicles with four or more axles and articulated lorries already travel along The Street and Broaden Lane. Properties fronting these roads are therefore already exposed to comparable vehicle movements and associated vibration levels to those that would be generated by the limited number of AIL movements required for the Scheme.
SNPC-003	Water Environment – Water Quality, Drainage and Flood Risk	The Street and the properties fronting it are already susceptible to surface water flooding. The Parish Council is concerned that the development will increase surface water runoff and thereby exacerbate existing flooding problems.	The Applicant notes this comment in relation to concerns on flood risk to The Street, Hempnall It is noted from **ES Volume 2**, **Figure 9.2 – Topography and Overland Flow Routes** contained within Appendix A of **ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy**

ID	Theme	Representation	Applicant's Response
			[AS-018] that whilst Sub-Sites 7E, 7F and 7G are located north/north-east of The Street, the topographic contours fall towards the north or east and therefore do not contribute overland flows towards Hempnall or The Street. The figure also shows that the land between Sub-Sites 7E-7G and Hempnall/The Street are very steep (level change of 45.0m AOD north to 29.0m AOD on The Street) and therefore if flooding issues are occurring due to overland flows from the fields, it would be from fields outside of the Order Limits. Notwithstanding the above, the proposed use for the Sub-Sites adjacent to Hempnall will be Solar PV 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 & Outline Surface Water Drainage Strategy [AS-018]** and secured within the **Design Principles, Parameters and Commitments [APP-213]**. The ground across the Solar PV Panels will consist of a grass and/or wildflower meadow maintained at a suitable height as secured in

ID	Theme	Representation	Applicant's Response
			the **Outline LEMP [APP-199]**. The provision of this grass cover all year round will significantly improve soil stabilisation 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. Therefore, the Scheme is not anticipated to exacerbate flooding to Hempnall/The Street.
SNPC-004	Consultation and Engagement	The Parish Council is also particularly concerned about the adequacy of the consultation process undertaken in relation to this application. The application documents are unnecessarily complex and extensive and are accessible only through the PINS website. Even residents who are confident and experienced computer users have found it extremely difficult to identify and assess the proposals affecting specific locations. No hard copies of the application documents have been made available for public inspection, and many residents do not have access to computers. As a result, a significant proportion of the community has been unable to properly understand	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 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.

ID	Theme	Representation	Applicant's Response
		the proposals or provide informed responses.	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 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 sticks were available to be sent directly to individuals upon request. The Applicant's **Section 56 Notice [OD-003]** provided further information on obtaining DCO Application documents. 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

ID	Theme	Representation	Applicant's Response
			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.
SNPC-005	General	Saxlingham Nethergate Parish Council objects to the East Pye Solar Project as a whole. We support the objections submitted by BEPS in both their Relevant Representation Summary and accompanying Full Relevant Representation, which cover the entire Scheme in detail.	The Applicant notes this comment and has responded to Block East Pye Solar's Relevant Representation [RR-0200] in the **Applicant's Response to Relevant Representations Part 3 [EN0110014/EXAM/8.8]**.
SNPC-006	Planning, Policy Compliance Statement of Need	The scheme would cause extensive and, in several respects, unmitigable harm to protected species, chalk-stream ecology, ancient woodland and SSSI-linked habitats, designated and non-designated heritage assets, 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	The Applicant refers to the response under row HPC-009. 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

ID	Theme	Representation	Applicant's Response
		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.	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). 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

ID	Theme	Representation	Applicant's Response
			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.
SNPC-007	Scheme Description	We object in particular to the inclusion of Site 7 within the East Pye Solar Development Consent Order application. Site 7 is not merely environmentally sensitive. It contains multiple legal, ecological, hydrological, heritage and infrastructure constraints	The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity, heritage and the water environment considerations embedded into the design principles, design buffers and design evolution, as set out in the **Design Approach Document [APP-212]**. The

ID	Theme	Representation	Applicant's Response
		which have not been resolved and which, on the available evidence, are not capable of being made acceptable by mitigation, later survey work, planning requirements, or post-consent licensing.	mitigation hierarchy has been applied to avoid, reduce or mitigate for, through the design process. The Applicant has assessed the likely significant effects of the Scheme, including Site 7, in the **ES [APP-042** to **APP-056]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans will ensure that impacts are kept to a minimum and are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032].** The ecological, hydrological, and heritage effects of the Scheme, including Site 7, are assessed within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], Chapter 9 – Water Environment [APP-045]**, and **Chapter 10 - Cultural Heritage [APP-046]**, which conclude there are several significant beneficial residual effects, and no significant adverse residual effects. **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** concludes that the Scheme will not have any significant adverse effects on

ID	Theme	Representation	Applicant's Response
			telecommunications, utilities, and television reception. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [APP-209]**. 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. Removal of Site 7 from the Scheme would not enable it to maximise utilisation of the grid connection.
SNPC-008	Site Selection, Alternatives and Design Evolution	Site 7 is the largest land parcel grouping in the East Pye Solar scheme. The applicant's own scoping material describes Site 7 as 327 hectares and confirms that it comprises twelve sub-sites, 7A to 7L. It lies close to Hempnall, Tasburgh, Saxlingham Nethergate and Woodton, with residential properties recorded as close as 30 metres from sub-site 7D, 120 metres from 7F, and 15 metres from 7L. The applicant also identifies multiple ancient woodlands within 2 km of Site 7, including Saxlingham Grove adjacent to sub sites 7F and 7G, and confirms that	The design of the Scheme has been informed by an environmentally led approach, with ecology and biodiversity and heritage considerations embedded into the design principles, design buffers and design evolution, as set out in the **Design Approach Document** [**APP-212**]. As set out in the **Design Principles, Parameters and Commitments [APP-213]** and **Works Plan [AS-002 and AS-003]**, design offsets to residential properties, Ancient Woodland and SSSI have been embedded into the design of the Scheme.

ID	Theme	Representation	Applicant's Response
		Shotesham-Woodton Hornbeam Woods SSSI borders sub-sites 7F, 7G and 7H.	
SNPC-009	Site Selection, Alternatives and Design Evolution	The effect is that Site 7 is not an ordinary agricultural site. It is a large, fragmented and ecologically connected block of land within a sensitive chalk-stream catchment, adjoining ancient woodland and SSSI habitat, overlapping functionally important bat habitat, affecting historic rural settlements and conservation-area settings, and requiring works close to or through highly constrained rural lanes, public rights of way, utilities and water receptors.	The Applicant refers to the response under row SNPC-007 and rows SNPC-012 to SNPC-014 on bats, ancient woodland, and habitat below.
SNPC-010	Site Selection, Alternatives and Design Evolution	For the reasons set out below, the Examining Authority should treat Site 7 as a fundamental objection point. It should not be included in the Order Limits unless and until the applicant can demonstrate a lawful, deliverable and environmentally acceptable scheme. On the current evidence, it has not done so.	
SNPC-011	Site Selection, Alternatives and Design Evolution	1. Site 7 has no demonstrated need sufficient to justify these location-specific harms	The Applicant refers to the response under row SNPC-007

ID	Theme	Representation	Applicant's Response
	Statement of 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. In its written representations, BEPS will submit wider evidence that regional transmission solar capacity targets are met or exceeded by existing, consented and pipeline projects, and that general claims about "optionality" or attrition do not justify severe harm in a highly sensitive landscape. The most serious harms on Site 7 are not generic or readily mitigable. They arise from the location itself: proximity to ancient woodland and SSSI habitat, the River Tas chalk-stream catchment, confirmed protected species habitat, Saxlingham Nethergate and other historic settlements, narrow historic lanes, public rights of way and rural infrastructure. If a scheme is not required in this location, these harms cannot be justified merely by invoking national renewable energy policy at a high level.	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

ID	Theme	Representation	Applicant's Response
			from available and suitable land and through its contracted grid connection. The urgent need for CNP infrastructure to achieving our energy objectives, together with the national security, economic, commercial and net zero benefits, means that it is likely the need case will outweigh any residual impacts not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional circumstances, and that this presumption does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats, or unacceptable risk or unacceptable interference offshore to navigation or onshore to flood and coastal erosion risk. As reported in the **Planning Statement [APP-209]**, the Applicant considers that no such residual impacts have been identified for the Scheme, with Ancient Woodland, ancient/veteran trees and other irreplaceable habitats, statutory designated ecological sites, historic environment, water quality and resources, and transport and

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			access considered to have neutral weight in the planning balance.
SNPC-012	Ecology and Biodiversity	2. Barbastelle bats: no credible European Protected Species licensing pathway East Pye Solar has confirmed that the whole area of the Scheme is of national importance for bats. Land Parcel 7 lies within overlapping Core Sustenance Zones for barbastelle bats, a European Protected Species, and directly adjoins ancient woodland confirmed to support maternity colonies. It identifies Saxlingham Nethergate 7D and 7F as land essential for foraging, commuting and maintaining functional connectivity between maternity sites. This is not a minor ecological matter that can be solved by planting hedges around solar panels. Barbastelles are highly light-sensitive, woodland-edge and dark-corridor specialists. The proposed development would introduce solar arrays, fencing, access tracks, lighting, construction activity and a 132 kV substation within a landscape used for commuting and foraging. Because	Measures for the protection of bats are included in **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]**. Further mitigation measures are set out in the **Outline CEMP [APP-196], Outline OEMP [APP-197]** and **Outline LEMP [APP-199]**. The Outline LEMP sets out the long-term management of habitats that will benefit foraging and commuting bats; ensuring that the operational phase of the Scheme provides increased foraging resources for bat species; including local Barbastelle bats. Detailed management plans will be submitted to and approved in accordance with the relevant Requirements of the **Draft DCO [AS-032]**. The Scheme designs primarily utilise intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular ploughing, tithing, harvesting (often undertaken at nighttime with large machinery and uncontrolled spotlights), herbicide / insecticide applications, and fertiliser

ID	Theme	Representation	Applicant's Response
		barbastelles are European Protected Species, the relevant question is not simply whether some mitigation might reduce effects. The question is whether the applicant can demonstrate a licensable development pathway. That requires satisfaction of the strict derogation tests, including no satisfactory alternative and maintenance of favourable conservation status. Where a development would damage or sever functional habitat within overlapping maternity-colony sustenance zones, the licensing bar is high. On the evidence available, the applicant has not demonstrated that a Natural England EPS licence could lawfully be granted. This gateway issue cannot be left to a post-consent licence application. A DCO should not be granted on the assumption that a lawful EPS licence will later be obtained where the evidence before the Examination indicates that favourable conservation status cannot be guaranteed and no satisfactory alternative layout has been demonstrated. If Site 7 is functionally	spreading activities. These regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including Barbastelle bat maternity roosts), therefore, land utilised for the Scheme is currently subject to regular disturbance, with the Scheme considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [APP-213]** and illustrated on **ES Volume 2, Figure 4.1 Indicative Masterplan [APP-059]**, include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including Barbastelle bats. It is therefore considered that under the Conservation of Habitats and Species

ID	Theme	Representation	Applicant's Response
		required to the scheme but cannot be licensed, that undermines the deliverability of the whole development.	Regulations 2017, there is no justification for an EPSML for Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would result in: (a) to impair their ability— • to survive, to breed or reproduce, or to rear or nurture their young; or • in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) to affect significantly the local distribution or abundance of the species to which they belong. **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and **ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157]** have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the CSZ's of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. Additional precautionary measures are embedded within the design principles adopted and detailed within the **Design Principles, Parameters and Commitments**

ID	Theme	Representation	Applicant's Response
			[APP-213] and illustrated on **ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]** include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the Order Limits and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status.
SNPC-013	Arboriculture Ecology and Biodiversity	3. Ancient woodland and SSSI risk: Site 7 is immediately adjacent to protected ecological assets The applicant's own scoping description confirms the proximity of Site 7 to multiple ancient woodlands and nationally designated ecological sites. Saxlingham Grove is recorded as adjacent to sub-sites 7F and 7G, while Shotesham-Woodton Hornbeam Woods SSSI borders sub-sites 7F, 7G and 7H. This proximity is significant because the harm is not limited to direct land-take. Solar development at this scale can	**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 within the **Design Principles, Parameters and Commitments [APP-213]** and **Works Plan [AS-002** and **AS-003]** include for the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements;

ID	Theme	Representation	Applicant's Response
		affect ancient woodland and SSSI function through hydrological change, dust, lighting, noise, vibration, construction disturbance, changes in predator pressure, fragmentation of commuting routes, and alteration of the surrounding supporting habitat. The applicant has not demonstrated that these effects can be excluded, particularly where the same land is also part of a wider barbastelle bat landscape. The SSSI and ancient woodland context reinforces the legal seriousness of the Site 7 objection. These are not ordinary receptors. They carry strong national policy and statutory protection. Where development directly abuts such assets, the burden is on the applicant to prove that harm will be avoided, not merely that it may be managed later through outline plans.	with significant habitat gains for the benefit of (amongst other species groups) bats and birds. These include a minimum of 30m design buffer from SSSI, Ancient Woodland and County Wildlife Sites, some of which are known to contain bat roosts; and 10m from hedgerows and 15m from individual trees, groups of trees and non-Ancient Woodland; and; establishing root protection zones around retained mature trees. This would reduce 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 favourable conservation status. Further information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [APP-199]**. Natural England has confirmed through its Relevant Representation [RR-1410], that it agrees with the conclusions of **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** that there will be no likely significant adverse effects on SSSI with the implementation of the CEMP which will be

ID	Theme	Representation	Applicant's Response
			substantially in accordance with the **Outline CEMP [APP-196]**.
SNPC-014	Ecology and Biodiversity Water Framework Directive	4. River Tas chalk stream and white-clawed crayfish: no lawful construction methodology has been demonstrated Site 7 is directly hydrologically connected to the river Tas chalk stream; drilling under the Tas is proposed to link Sites 5 and 7. Recent survey evidence from Norfolk Rivers Trust, provided to the applicant in December 2025, identifies a breeding colony of white-clawed crayfish in the Tas at Saxlingham Thorpe within 2KM of site 7. The applicant's 'walk-over' aquatic surveys, carried out when ditches and streams were dry, are inadequate in these circumstances. White-clawed crayfish are a highly protected and declining native species. The Environment Agency's scoping comments record that EA records show the presence of white-clawed crayfish on the River Tas. The EA recommended a commitment to survey for crayfish at relevant locations when works affecting watercourses are known. The same	**ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report** [**APP- 160**] considers impacts to white clawed crayfish are unlikely due to the paucity of records and unsuitability of the habitat. This is further explained in paragraphs 8.9.451 to 8.9.470 of **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. Impacts to watercourses have been mitigated by measures set out in the **Outline CEMP [APP-196]**, the **Outline OEMP [APP-197]** and **Design Principles, Parameters and Commitments [APP-213],** including the establishment of a 10m buffer and surface water management activities, the avoidance of instream works and use of trenchless techniques, the adoption of good practice techniques and the appointment of both an Environmental and ECoW. **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]** includes the provision of method statements designed to avoid impacts upon aquatic habitats and associated species;

ID	Theme	Representation	Applicant's Response
		comments identify the River Tas as a chalk stream priority habitat and a focus of EA activity. This is a major legal and practical constraint. The construction of Site 7 would require cabling, trenching, haulage, possible Horizontal Directional Drilling, works near ditches and watercourses, and potentially works within a fissured chalk geology. There are clear risk pathways: cabling and trenching, potential HDD beneath or near fissured chalk, haulage and compaction, and sediment and pollution risk to the hyporheic zone. Chalk streams are exceptionally sensitive to sedimentation, pollution, hydrological disturbance and changes to groundwater/surface-water interaction. White-clawed crayfish are particularly vulnerable to sediment, pollution, habitat disturbance and invasive species transfer. Without full crayfish surveys, a hydrological and hydrogeological assessment, a Water Framework Directive assessment, and a proven construction method, the applicant cannot demonstrate that Site 7 can be built without unlawful harm. It is not	these include *Method Statement 4: Pollution Prevention Measures*, *Method Statement 7: Precautionary Horizontal Directional Drilling (HDD) Methodology*, and *Method Statement 11: Specific Measures for Invasive Non-Native Species*; which includes commitments to prevent the spread of signal crayfish/crayfish plague. Also, as per the **Outline Cable Route Construction Statement [APP-216]**, where trenchless crossing is proposed in relation to main 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 River Tas thereby avoiding any temporary impacts upon white clawed crayfish populations. The Applicant is satisfied that these measures combined will rule out any impacts to instream and bankside habitats used by white-clawed crayfish as well as remove the likelihood of pollution, sedimentation and biosecurity issues affecting the population. Notwithstanding, the Applicant notes the Examining Authority's request for further

ID	Theme	Representation	Applicant's Response
		enough for the applicant to say that watercourse impacts will be managed through a future CEMP or later method statements. If the development requires works in or near a chalk stream supporting protected species, the lawful construction pathway must be demonstrated before consent.	information and potentially for surveys to be carried out for white clawed crayfish between July – September, in the **Rule 6 letter [PD-005]**. The Applicant has provided an update on this at **Procedural Deadline A** as set out in the document **Applicant's Position on White Clawed Crayfish [EN0110014/EXAM/8.5]**.
SNPC-015	Water Framework Directive	5. Water Framework Directive and water environment: the applicant has not proved no deterioration Site 7 sits in a highly sensitive chalk-stream and chalk-aquifer catchment, with a high degree of hydrological connectivity directly to the Tas chalk stream. Impacts on private water supplies, private sewerage and hydrological connectivity have not been properly assessed. Any watercourse crossing, ditch crossing, HDD, haul route, trenching, runoff change, compaction, sediment release or pollution pathway must be assessed against the requirement to prevent deterioration in waterbody status. The applicant has not shown that the construction and operation of Site 7	The Applicant refers to the response under row SNPC-014. The WFD catchments which interact with Site 7 are the Hempnall Beck WFD water body catchment and the River Tas (Tasburgh to R. Yare) WFD waterbody catchment. Connectivity of these waterbodies to the River Tas and potential impacts of the elements of the Scheme falling within these catchments have been screened and further assessed for WFD compliance within Sections 3 and 4 of the **ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163]**. The locations of private sewerage arrangements are not mapped and unlikely to be publicly available, therefore potential impacts to these cannot be included in the WFD assessment at this stage. Should

ID	Theme	Representation	Applicant's Response
		would avoid deterioration of the River Tas system or avoid impacts on priority chalk-stream ecology. Where a scheme risks deterioration of a chalk stream and harm to protected aquatic species, the legal test is precautionary and evidence-led. On the present material, the applicant has not supplied the required evidence to pass that test.	further information become available, the WFD assessment will be kept under review and updated if required, Potential impacts to private water supplies are addressed in the response to comment MFPC-011 as shown in the **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184** to **APP-186]**, Embedded mitigation for the management of pollution risk to receptors (leaks/spills/contaminants in surface water runoff), including private water supplies and the River Tas 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.
SNPC-016	Arboriculture	6. Absence of botanical survey: the ecological baseline is legally inadequate	As set out in **ES Volume 1, Chapter 11 - Transport and Access [APP-174]** and the

ID	Theme	Representation	Applicant's Response
	Ecology and Biodiversity	A level 6 botanist familiar with the local botanical record wrote an open letter, copied to East Pye Solar pre-application, stating that rare and priority plant assemblages associated with long-established grassland, roadside verges, access routes and cable corridors were in the location of this Scheme. He called for two season surveys to be undertaken to understand the botanical baseline before the application progressed further. This work has not been carried out. Site 7, its access routes and cable corridors are known to support very rare botanical assemblages, no botanical survey has been carried out despite road-widening and haul-road proposals. The absence of botanical survey is not a minor evidential gap. It means the applicant has not established which habitats and species would be lost, damaged or fragmented. Without that baseline, the applicant cannot lawfully finalise the layout, design road widening, design cable routes, assess Biodiversity Net Gain, assess cumulative ecological impacts,	**Outline CTMP [APP-201],** construction traffic will be managed through defined access routes and traffic management measures to minimise effects on the Local Road Network and associated assets. This includes the potential to restrict vehicle sizes in some locations to aid manoeuvring and traffic management measures like reducing speed limits during construction which in turn reduces visibility splay requirements. For visibility splay for vehicles and highway works associated with AIL movements, vegetation may be required to be trimmed and, in some cases, vegetation and/or street furniture removed when absolutely necessary to maintain the required sight lines for safety and to accommodate oversail. 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

ID	Theme	Representation	Applicant's Response
		or prove that impacts can be avoided or mitigated. A DCO should not be granted where the applicant has not identified the ecological assets it may destroy.	designated features of the RNR'S (rare grassland flora). These matters are subject to detailed design and will be discussed and agreed through a detailed CTMP, secured by a DCO Requirement. The final CTMP will be developed and agreed with NCC, in its role as Local Highway Authority prior to the commencement of construction. Surveys of habitats and plants, sufficient to inform the ES, have been undertaken are reported in **ES Volume 3, Appendix 8.1 – Ecological Desk Study and Extended Habitat Survey [APP-152],** which has been used to inform **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** which includes assessment of the Scheme on important ecological features including habitats and plants. This scope of surveys has been agreed through EIA scoping and stakeholder consultation, as described in Section 8.2 of the **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** An extended habitat survey (UKHab methodology) has been undertaken as reported in **ES Volume 3, Appendix 8.1 -**

ID	Theme	Representation	Applicant's Response
			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. Habitats avoidance/mitigation measures during construction and operation of the Scheme are secured in the **Outline LEMP [APP-199]** including commitments for grassland protection and reinstatement. 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.
SNPC-017	Cultural Heritage Landscape and Visual	7. Heritage, conservation areas and historic rural landscape: harm cannot be screened away by distance Site 7 lies within a historic rural landscape of high sensitivity. South Norfolk is of national importance for its quantity and quality of pre-1750 rural	The Applicant's landscape and visual assessment presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has been undertaken in accordance with the appropriate guidelines. It has informed the iterative design process and is robust and

ID	Theme	Representation	Applicant's Response
		architecture, with over 300 listed buildings in the zone of influence. Site 7 is so large that the settings of multiple Grade II* and Grade II listed buildings and conservation areas are affected. The Site 7 poses direct harm to Saxlingham Green Conservation Area and listed buildings. Saxlingham Nethergate is not simply a receptor near the scheme, but is part of the historic experience of the landscape affected by sub-sites 7D and 7F, construction routes, AIL routes, lighting, fencing, traffic, and the industrialisation of open rural approaches. The settings of listed buildings and conservation areas must be properly assessed, and great weight must be given to their conservation. In a landscape where listed buildings, ancient lanes, historic greens, church approaches, Boudica Way, and rural settlement form a coherent historic environment, the harm is cumulative and experiential. Screening heritage harm by arbitrary distance or relying on future planting is not adequate. Planting does not restore tranquillity, remove	appropriate for the assessment of the Scheme. The Applicant acknowledges the Scheme would introduce a series of new features into the rural landscape however the Applicant considers at worst this would result in moderate adverse effects in the long term which are reversible as reported in **ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120],** and **ES Volume 3, Appendix 7.3 – Visual Assessment Tables [APP-147]**. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects

ID	Theme	Representation	Applicant's Response
		industrial character, undo fencing, remove substations, prevent traffic vibration, or preserve the historic relationship between village, lanes, fields and public routes.	The assessment of potential impacts to Saxlingham Nethergate, Saxlingham Green, Listed Buildings, and Conservation Areas have been provided within **ES Volume 3, Appendix 10.1 – Heritage Statement Part 1 [APP-165 – APP-168]** and **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046],** both of which have been undertaken in accordance with appropriate guidelines. In regard to Saxlingham Green and the Listed Buildings within, setbacks have been established within the northern parts of Sub-Sites 7D and 7F, the areas of the Scheme which extend closest to the southern boundary of Saxlingham Green Conservation Area. Within the northernmost part of Sub-Site 7D and eastern part of Sub-Site 7F, Solar PV Panels have been removed from those fields which are situated adjacent the eastern and western approaches into the conservation area, with these areas to be retailed as grassland. Several linear belts of broadleaf woodland will also be established within the northern parts of Sub-Site 7D and 7F, continuations of established woodland already present within the landscape south of Saxlingham Green.

ID	Theme	Representation	Applicant's Response
			The significance of Saxlingham Green derives primarily from its preserved historic settlement layout, with the surrounding vegetation helping to enclose the village from views across the surrounding rural landscape. While there are a few gaps in the surrounding vegetation, these will be mitigated by proposed landscaping within Sub-Site 7D and 7F. These landscaping initiatives will ensure that the Scheme does not encroach upon Saxlingham Green. It is noted that AIL routes may potentially be required within the boundaries of both Saxlingham Nethergate Conservation Area and Saxlingham Green Conservation Area; however, any movements within each of these conservation area boundaries would be limited during the construction phase to ensure any impacts are kept to a minimum. These works are detailed within **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** will be managed by the **Outline CTMP [APP-201]**. No potential 'strikes or swipes' have been identified with heritage assets within either conservation area, and there are no concerns regarding vibrations and heritage assets. It is considered that due

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			to the temporary nature of these works, there will be no harm to the character or appearance of the conservation areas.
SNPC-018	Traffic and Access	8. Public rights of way, Boudica Way and historic route severance Site 7 poses serious harm to public rights of way and to Boudica Way, which is South Norfolk's only long distance footpath. Boudicca Way runs along the length of the Saxlingham Green conservation area and links with Botenha Way. Industrial solar development would destroy historic and experiential value, conflict with public access and heritage objectives, and create perceived unsafe confined spaces for users. High security fencing, panels, substations, cabling compounds, construction traffic, AIL movements and loss of open rural views would change the character of the rights-of-way network for the lifetime of the development. Multiple public rights of way and recreational receptors would be	As detailed in the **Outline PRoWPPMP [APP-203],** all PRoW to be temporarily closed and diverted during the construction phase will be reopened once construction activities at each respective area is complete. As detailed in Table 4.1 of the **Outline PRoWPPMP [APP-203]** and shown in the **Access and Public Rights of Way Plan [APP-011]**, the PRoW within Site 7 subject to medium-term restrictions include Hempnall FP2 and FP4, Saxlingham Nethergate FP11, FP13, FP14 and FP27. As detailed in Section 3.2 of the **Outline PRoWPPMP [APP-203]**, the only section of the Boudicca Way that directly crosses the Order Limits is within CRC4 and a short section of Fairstead Lane within the Order Limits. It is however noted that this section of Fairstead Lane within the boundary no longer forms part of the construction access strategy and therefore this section of Boudicca Way would not be impacted. The **Design Principles, Parameters and Commitments [APP-213]** includes an offset

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		impacted across Site 7, including Hempnall FP1-5, Hempnall BR30, Saxlingham Nethergate FP9-14, FP27, FP28, Saxlingham Nethergate RB17, Tasburgh FP2 and Woodton RBN10. For a 60-year development, this is not temporary disruption. It is the long-term industrialisation and enclosure of a historic rural access network for the remaining lifetimes of most residents.	design buffer of at least 15m from PRoW within the Scheme. As part of the Scheme, three new permissive paths, together with community accessible space, are proposed to maintain and enhance public access. These will complement the existing PRoW network and will remain open throughout the 60-year operational lifetime. Where a temporary PRoW closure, restriction or diversion is required, these will be carried out in accordance with the DCO powers, including reaching agreement with the PRoW officer at NCC in advance, where applicable. As detailed in Section 4, 5 and 6 of the **Outline PRoWPPMP [APP-203]**, management measures are proposed for the construction, operation and decommissioning phase and will be developed further in a detailed PRoWPPMP, which is secured by Requirement 17 of the **Draft DCO [AS-032]**.
SNPC-019	Utilities	9. High-pressure gas main and utilities: unresolved safety and deliverability risk The high-pressure gas main crosses land parcel 7F and passes close to the proposed substation, creating a fire and explosion safety concern. Rural fibre-optic broadband infrastructure is	The Applicant has considered utilities in the design of the Scheme, including the high-pressure gas main. Offsets 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 (including to the benefit

ID	Theme	Representation	Applicant's Response
		situated within Land Parcel 7; the applicant has not mapped it, consulted operators or users, or assessed diversion, protection or outage risk. These are not peripheral utility issues. A high-pressure gas main close to electrical infrastructure, construction compounds, cabling, fencing and access works is a major constraint. Similarly, rural broadband is essential infrastructure for homes, farms and businesses. Damage or diversion could cause significant community and business harm and may materially affect construction feasibility. The applicant has not demonstrated that Site 7 can be constructed and operated safely around these constraints. A DCO should not authorise development over or near such infrastructure on the basis of later discovery and later agreement.	of National Gas; the owners of the high pressure gas main (Part 5 of Schedule 14) and for broadband providers (Part 2 of Schedule 14)), in Schedule 14 to safeguard the assets of infrastructure providers and operations associated with the Scheme.
SNPC-020	Transport and Access	10. Residential amenity, schools, care home and rural lanes Site 7 gives rise to serious and unresolved objections in relation to construction traffic, Abnormal Indivisible Loads, noise and vibration, highway	The assessment of construction traffic noise is presented within Section 12.8 of **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. The resultant impacts on all roads (which include the receptors noted) are negligible to low, which result in a

ID	Theme	Representation	Applicant's Response
		safety and residential amenity. The applicant's own scoping material records residential receptors extremely close to Site 7, including properties approximately 30 metres north of 7D, 120 metres north-east of 7F, and 15 metres east of 7L. The noise and vibration baseline also identifies sensitive receptors around Church Lane, The Green, Springwood Lane, Pymars Lane, Fairstead Lane, Quaker Lane, Tasburgh and other locations surrounding Site 7, together with numerous public rights of way used by walkers, riders, cyclists and local residents. These are not remote or isolated receptors. They are homes, village streets, rural lanes, a primary school, a care home on The Green at Saxlingham Nethergate, historic buildings and community routes lying close to proposed construction areas, construction compounds, access routes, cable works and AIL routes. The applicant has not demonstrated that construction traffic, HGV movements, AIL deliveries, road widening, vegetation removal, temporary traffic management,	short term, negligible to minor adverse effect, which is not significant. An assessment of construction traffic vibration is also presented within Section 12.8 of **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. At distances of approximately 10m or more, the vibration level is expected to be 1 mm/s PPV or below during HGV passbys, which is below the Significant Observed Adverse Effect Level,(SOAEL). High sensitivity receptors which are 10m or more away from access roads would therefore experience short-term negligible to minor adverse effects, which are not significant. Two properties in Saxlingham Nethergate have been identified which are within 5m of the road edge, which are: • The Old School on The Street • Manor Farmhouse on Broaden Lane Based on traffic 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

ID	Theme	Representation	Applicant's Response
		noise, vibration, dust and disturbance can be accommodated without unacceptable harm to residents and road users. Saxlingham Nethergate is particularly sensitive. It has narrow unclassified roads, existing congestion, known flooding constraints, restricted HGV access and historic buildings close to the proposed AIL route. The movement of abnormal loads, heavy construction vehicles and associated plant through or near this village would create obvious risks to highway safety, pedestrian safety, school access, care home amenity, residential tranquillity and the structural integrity of vulnerable historic buildings. These impacts are not adequately addressed by reliance on a future Construction Traffic Management Plan or later route agreements.	The Street and Broaden Lane during the traffic survey. Properties which front these roads are therefore already likely to be exposed to comparable levels of vibration which would be generated by AIL required for the Scheme. The Applicant notes the concerns raised regarding construction traffic and AIL movements. These matters are assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**. The access strategy has been developed having regard to the sensitive receptors along the local highway network and through ongoing engagement with NCC as the Local Highway Authority. Internal haul routes have been incorporated to reduce the use of local roads where practicable, and the **Outline CTMP [APP-201]** includes measures such as delivery scheduling, vehicle booking systems, traffic management measures and management of AIL movements. The Applicant does not agree that these matters are deferred to a future CTMP or route agreements. The likely

ID	Theme	Representation	Applicant's Response
			effects of construction traffic and AIL movements have been assessed within the ES based on the proposed access strategy and associated traffic forecasts. The **Outline CTMP [APP-201]** sets out the framework of mitigation measures identified through that assessment, while AIL movements would be subject to further route assessment and approval process with the relevant highway authorities. The detailed CTMP will be substantially in accordance with the **Outline CTMP [APP-201]** and secured through the Requirements of the **Draft DCO [AS-032**], ensuring that the mitigation and management measures identified through the assessment are implemented for the construction phase of the Scheme.
SNPC-21	Traffic and Access	The problem is not simply the number of vehicle movements. It is the incompatibility between industrial scale construction logistics and a rural village-edge road network that was never designed for this type or intensity of traffic. Narrow lanes, close residential frontages, limited passing places,	**ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **177]** and **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** considers the rural nature of the Local Road Network, including carriageway widths, junction constraints, sensitive receptors such as residential properties, PRoW and AIL. The assessment

ID	Theme	Representation	Applicant's Response
		constrained junctions, flooding, public rights of way, school movements and vulnerable receptors all reduce the practical scope for mitigation. Measures such as timing restrictions, banksmen, signage or temporary traffic controls cannot remove the fundamental conflict between the scheme and the local highway environment. The same constraints also undermine construction feasibility more broadly. The narrow lanes and close receptors that make traffic impacts unacceptable also constrain emergency access, ecological mitigation, heritage protection, noise control and safe construction working. For Site 7, traffic, AILs, noise and residential amenity are therefore not secondary matters. They are part of the wider case that this land parcel is unsuitable and undeliverable for industrial-scale solar and associated electricity infrastructure.	concludes that construction traffic can be accommodated safely through the identified access routes and the implementation of appropriate traffic management measures, as detailed in the **Outline CTMP [APP-201]**. Constraints of the Local Road Network have been taken into account and are assessed within the **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**. Section 11.5 of the ES Chapter details the assessment methodology, which has been prepared in alignment with IEMA Guidance, and is standard industry practice for assessing traffic and transport impacts within an ES Emergency access, ecology, heritage, noise and construction management have been assessed in the ES and this has informed the design and mitigation strategy. Site access design, visibility splays and swept-path analysis have also been included to assess suitability for access to each site. This is shown in Appendix C of the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **177]**.

ID	Theme	Representation	Applicant's Response
			The Applicant considers that the transport and access arrangements for Site 7 have been sufficiently assessed and accompanying management and mitigation measures are proposed to minimise impacts on the Local Road Network.
SNPC-022	Cumulative Effects, In-Combination Impacts Legal	11. Cumulative impact and no credible construction scenario Any one of the above issues would require serious examination. Taken together, they show that Site 7 is not deliverable as proposed. No licensable ecological pathway has been demonstrated, no lawful construction methodology has been shown for the River Tas, no ecologically informed layout is possible, and no reliable infrastructure protection strategy exists. Site 7 cannot be treated as a normal land parcel where residual impacts can be balanced against claimed benefits. It is a convergence point for strict legal protections and unresolved physical constraints. The applicant is asking the decision-maker to assume that multiple future licences, surveys, approvals, method statements and mitigation plans	The Applicant refers to the response under rows SNPC-011 to SNPC-21. The Applicant is aware of other projects in the region. The technical chapters of **ES Volume 1 [APP-042** to **APP-054]** present an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The cumulative effects assessment of the ES has been undertaken in line with the EIA Regulations and the PINS Advice on Cumulative Assessment, and is considered to a robust yet proportionate approach to assessing the cumulative impacts 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
		will all be achievable. That is not a robust basis for consent.	The Scheme will primarily be determined in accordance with NPS EN-1, EN-3 and EN-5. 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 only future (potential) consents are set out within the **Consents and Agreements Position Statement [APP-217]**. The Applicant confirms that the DCO incorporates enforceable mechanisms to regulate Scheme delivery. Failure to comply with a DCO Requirement can be found to be a criminal offence, if there is no valid legal reason for such a breach. The purpose of the DCO is to facilitate the delivery of the scheme, including the approval of the relevant plans at discharge stage, subject to appropriate approvals once detailed design is known. The drafting of the DCO ensures that final plans "must be implemented as approved". This secures legal compliance. The plans themselves will also include monitoring and mitigation provisions. The approach taken aligns with

ID	Theme	Representation	Applicant's Response
			the consenting approach of all other solar DCOs to date. A comprehensive site selection process took place, which took account of the relevant policies noted above. As outlined in the **Design Approach Document [APP-212]**, throughout the design process, the Applicant adopted a multi-disciplinary approach to design, considering both the opportunities and constraints of the Scheme. This included analysis of the existing physical, environmental, social and cultural context of the site, including Site 7, by a broad range of technical disciplines (including landscape, ecology, water, noise and vibration, ecology and heritage). Paragraph 9.4.19 of the **Planning Statement [APP-209]** concludes that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. Further, the substantial 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 beneficial effects that are anticipated during the construction, operational and

ID	Theme	Representation	Applicant's Response
			decommissioning phases of the Scheme, such as in relation to biodiversity, green infrastructure strategy, employment and training.
SNPC-23	General	12. Relief sought We respectfully request that the Examining Authority and Secretary of State refuse development consent for East Pye Solar.	The Applicant disagrees with this comment. The **Planning Statement [APP-209]** sets out the Applicant's case in favour of the development being granted consent.
SNPC-24	Ecology and Biodiversity	In the alternative, Site 7 should be removed from the Order Limits unless the applicant first provides, and consults upon, a legally adequate evidence base demonstrating: • Full barbastelle bat survey evidence and a credible Natural England EPS licensing pathway; • proof that favourable conservation status of barbastelles and other protected species can be maintained; Full white-clawed crayfish surveys and assessment of all River Tas, ditch, cable, HDD and haul road impacts;	**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 Core Sustenance Zones (CSZ's) of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. 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

ID	Theme	Representation	Applicant's Response
			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-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.

ID	Theme	Representation	Applicant's Response
			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 Barbastelle bats (if present), thereby contributing towards the species favourable conservation status. It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for an EPSML for Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would result in: (a) to impair their ability— • to survive, to breed or reproduce, or to rear or nurture their young; or • in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) to affect significantly the local distribution or abundance of the species to which they belong. No records of white-clawed crayfish have been identified within the Order Limits. Habitat suitability survey for White Clawed

ID	Theme	Representation	Applicant's Response
			Crayfish was undertaken with the findings in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and **ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160]**. Measures to control pollution to watercourses 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 **Design Principles, Parameters and Commitments [APP-213]** sets out the minimum offset distances within the design for main rivers and watercourses. Where cables cross main rivers, the Applicant is also committed to a minimum cable depth beneath main rivers of 5m below the surveyed bed of main rivers, as secured through the **Design Principles, Parameters and Commitments [APP-213]**.
SNPC-25	Water Framework Directive	A Water Framework Directive screening and, if required, full assessment demonstrating no deterioration;	**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, including Site 7, 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,

ID	Theme	Representation	Applicant's Response
			where this information may have relevance to WFD requirements and objectives.
SNPC-26	Arboriculture	Full-season botanical surveys of Site 7, access routes, verges, road-widening areas and cable corridors;	As set out in **ES Volume 1, Chapter 11 - Transport and Access [APP-174]** and the **Outline CTMP [APP-201]**, construction traffic will be managed through defined access routes and traffic management measures to minimise effects on the Local Road Network and associated assets. This includes the potential to restrict vehicle sizes in some locations to aid manoeuvring and traffic management measures like reducing speed limits during construction which in turn reduces visibility splay requirements. For visibility splay for vehicles and highway works associated with AIL movements, vegetation may be required to be trimmed and, in some cases, vegetation and/or street furniture removed when absolutely necessary to maintain the required sight lines for safety and to accommodate oversail. Site Access designs, visibility splays and swept-path analysis is detailed in Appendix C of **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]**.

ID	Theme	Representation	Applicant's Response
			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. Following detailed design and agreement, specific ecological protection measures can be applied if required, in agreement with Norfolk County Council An extended habitat survey (using UKHab methodology) has been undertaken as reported in **ES Volume 3, Appendix 8.1 Ecological Desk Study and Extended Habitat Survey [AS-017]**. This records the findings of a desk-based study and the detailed habitat survey and mapping of habitats identified within the Order Limits. During this extended habitat survey,

ID	Theme	Representation	Applicant's Response
			there is no evidence to suggest that further targeted botanical surveys are required. The UKHab methodology is an industry standard approach to habitat assessments, and it is not considered appropriate to undertake further detailed botanical surveys.
SNPC-27	Ecology and Biodiversity	A revised Biodiversity Net Gain assessment based on actual survey data;	Whilst there is currently no legislative requirement for the Scheme to provide BNG, the Applicant has included a commitment to a minimum of 10% BNG through Requirement 9 of the **Draft DCO [AS-032]**. The Applicant has therefore taken the opportunity to enhance biodiversity and deliver a measurable net gain for nature. This includes the calculation of habitat baseline values and post-construction values provided within the **Biodiversity Net Gain Statutory Metric [APP-219]**. The habitat baseline which has informed the BNG calculation is based on a habitat survey carried out between May and September 2024 (Solar PV Sites) and May 2025 to January 2026 (CRC and Highway Improvement Areas). Further details are provided in **ES Volume 3, Appendix 8.1 -**

ID	Theme	Representation	Applicant's Response
			Ecological Desk Study and Extended Habitat Survey [APP-152].
SNPC-28	Water Framework Directive	A complete hydrological and hydrogeological assessment of the River Tas, ditches, chalk aquifer, private sewerage and vulnerable water receptors;	Water Framework Directive (WFD) obligations are based on individual WFD waterbody catchment areas, and the River Tas and connecting 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 **ES Volume 3, Appendix 9.2 – Water Framework Directive Assessment [APP-163]** Potential impacts to private water supplies are addressed in the response to comment MFPC-011 as shown in **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184** to **APP-186]**. Embedded mitigation for the management of pollution risk to receptors (leaks/spills/contaminants in surface water runoff), including private water supplies and the River Tas 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,

ID	Theme	Representation	Applicant's Response
			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.
SNPC-29	Cultural Heritage	A full heritage-setting assessment for Saxlingham Nethergate, Saxlingham Green, listed buildings, conservation areas and historic routeways;	The Applicant notes that assessments of potential impacts to Saxlingham Nethergate, Saxlingham Green, Listed Buildings, and Conservation Areas have been provided within **ES Volume 3, Appendix 10.1 – Heritage Statement Part 1 [APP-165 – APP-168].** No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including those of heritage assets, have been assessed in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and mitigated where potential impacts were identified.
SNPC-30	Transport and Access	A public rights of way and Boudica Way assessment that addresses qualitative severance, safety, enclosure and loss of historic experience;	An assessment of Public Rights of Way and permissive paths, including Boudicca Way, is detailed within the **Outline PRoWPPMP [APP-203]**. This includes details of the PRoW and permissive paths impacted during the construction phase, alongside proposed management measures to reduce impacts.

ID	Theme	Representation	Applicant's Response
			An assessment of impacts with respect to traffic and transport, including pedestrian amenity, is included within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and has been prepared in accordance with IEMA Guidance.
SNPC-31	Other Environmental Matters	A utilities and safety assessment for the high-pressure gas main, broadband infrastructure and any other buried services;	The Applicant has considered utilities in the design of the Scheme, including the high-pressure gas main. Offsets 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 (including to the benefit of National Gas the owners of the high pressure gas main and for the protection of operators of electronic communications code networks, amongst others), in Schedule 14 to safeguard the assets and associated operations.
SNPC-32	Construction and Decommissioning	And a revised construction methodology proving that Site 7 can actually be built without unlawful ecological, hydrological, heritage, safety or community harm.	The Applicant refers the respondent to the **Site Selection Assessment [APP-215], Design Approach Document [APP-212]**, **Statement of Need [APP-206]** and **Planning Statement [APP-209],** which together set out the evidence base for the inclusion of Site 7 within the Order Limits. The likely significant effects have been assessed within the **ES**

ID	Theme	Representation	Applicant's Response
			[APP-036 to **APP-195]**, with mitigation secured through the outline management plans **[APP-196 to APP-205]** and Schedule 2 Requirements of the **Draft DCO [AS-032]**.
SNPC-33	General Legal	Unless and until that evidence is supplied, Site 7 should be treated as legally and practically undeliverable. The applicant has not shown that this harmful scheme is necessary, fairly assessed, lawfully licensable, or environmentally acceptable in this location.	The Applicant considers that the matters raised in SNPC-24 to SNPC-32 have been appropriately and comprehensively addressed. The Applicant has addressed the likely significant effects in the **ES [APP-036 to APP-195]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as is necessary and practicable. The management plans are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032]**. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [APP-209]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy.

2.13 Seething Parish Council

Table 2.13 Applicant's Response to Seething Parish Council [RR-1748]

ID	Theme	Representation	Applicant's Response
SePC-001	Statement of Need	Seething Parish Council recognise that the accelerating climate emergency necessitates an urgent transition from fossil fuel to renewable energy sources. Moreover, as evidenced by current global events, a need to maintain and improve national energy security is paramount.	The Applicant notes this supportive comment in relation to the need to transition to renewable energy sources and improve national energy security, both benefits brought forward by the Scheme.
SePC-002	Planning, Policy Compliance	In parallel with energy concerns, the enhancement of food security is of equal importance; and this, in turn, necessitates the maintenance of biodiversity, and the protection of local environments and ecosystems. In this context, large scale ground-based solar energy projects with the capability to link into existing grid energy infrastructure, and which, if appropriately managed, enhance rather than degrade existing ecosystems and biodiversity, provide an opportunity to achieve each of these aims.	The **Statement of Need [APP-206]** sets out the case for large-scale solar generation as part of the UK's decarbonisation and energy security response. Effects on agricultural land are assessed in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051],** supported by **ES Volume 3, Appendix 15.1 – Agricultural Land Classification [APP-182]**, and effects on biodiversity are assessed **in ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. The Scheme incorporates biodiversity enhancement measures secured through the **Outline LEMP [APP-199]** and delivers a minimum

ID	Theme	Representation	Applicant's Response
			10% Biodiversity Net Gain, as set out in the **Biodiversity Net Gain Report [APP-218]** and **Biodiversity Net Gain Statutory Metric [APP-219]**. Implementation is secured by Requirement 9 in Schedule 2 of the **Draft DCO [AS-032]**.
SePC-003	General remarks	In consequence, throughout the pre-application phase, Seething Parish Council has adopted a position of constructive engagement with the East Pye developer, to ensure that the above aims might be meet whilst minimising impact upon our community and local environment.	The Applicant notes this comment and welcomes engagement with Seething Parish Council.
SePC-004	Soils and Agriculture	We wish to emphasise our analysis of the following issues: Food Security: UK Government statistics indicate that East Anglia farmland comprises 1.42x106 ha of which 80% is arable. Consequently, the East Pye proposal comprising approximately 1100ha represents 0.08% total farmland and 0.1% of current arable land in East Anglia: the repurposing of this area to solar PV production might therefore have only a very limited impact upon UK	The Applicant appreciates SePCs analysis on arable land area within East Anglia. **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). 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

ID	Theme	Representation	Applicant's Response
		food security. In the context of a loss of 0.1% arable area to PV generation, it must also be acknowledged that 2.3% of UK arable land use is currently for bioenergy and biofuel production and thereby fails to contribute to food security.	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.
SePC-005	Soils and Agriculture	With reference to the Agricultural Land Classification map Eastern Region (ALC008) [REDACTED], the majority of the East Pye area is identified as grade 3 (good – moderate) typical of South Norfolk, with the area of site 10 in Seething defined as grade 4 (poor). However, we note that the specific land classification survey within the application identifies Sites 10A-E as grade 3a agricultural land classification (rather than grade 4 from the 2010 database) but recognise that productivity is heavily fertiliser-dependent and adversely affected by increasing climatic patterns of winter flood and summer drought. The repurposing of site 10 to solar production may therefore be favourable in terms of a balance between energy security and food security.	The Parish Council's comments are noted. The Provisional ALC maps have now been replaced by the Predictive Agricultural Land Classification Map for England (Defra, 2026), which was published after the ES was produced. This remains a predictive map. Detailed ALC surveys have been undertaken, as set out in **ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182]**, mapped within **ES Volume 2, Figure 15.1 – ALC Results [AS-010]** and analysed in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The assessment concludes that the effects on food production and the wider land-based economy will be minor or negligible (section 15.8.108 considers this matter including effect on Sites 1, 2, 4A, 5A, or 7A, C and F). The Applicant has sought to reduce the use of BMV land where practicable taking into consideration the design other consideration for

ID	Theme	Representation	Applicant's Response
		However, it is of considerable concern that sites 1; 2; 4A, B (partial); 5A, B; and 7A, C,F are identified within the proposal as of grade 2 classification (highly productive soils) and we question whether repurposing such prime agricultural land for PV production represents best use of a scarce resource within the area.	the scheme such as flood risk, ecology and grid connection as set out in the **Design Approach Document [APP-212]**, including the removal of Sub-Site 3A entirely from the Order Limits and reductions in the extent of Solar PV Arrays within Site 3, Sub-Site 5B, Site 6 and Sub-Site 8A.
SePC-006	Landscape and Visual	Scale and visual appearance: Whilst East Pye Solar Environmental Statement Volume 1: Chapter 4 – The Scheme Revision 1 March 2026 and table 4.1 within the Design Principles, Parameters and Commitments APP/7.18 Table 4.1: Work No.1 detail installation of tracker panels (north-south orientation with max height 4.5m) and fixed arrays (east-west orientation with max height 3.5m), the precise specification of the solar PV units and ground mounting systems are inadequately defined in the proposal. The placement of 4.5m height tracker arrays close to PRoW and sites otherwise visible to communities is	The Applicants 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, for example the need to consider the maximum parameters and a worst-case scenario for the Scheme, and it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The assessment includes solar panels at a maximum height of 4.5m, however it should be acknowledged that this maximum height will only be experienced at set intervals during the day and will be at reduced heights for the majority of a 24-hour period. As demonstrated on the **Green Infrastructure Strategy [AS-005] t**he Applicant has sought to reduce adverse effects on the landscape and its

ID	Theme	Representation	Applicant's Response
		unacceptable. PV units should be positioned sympathetically in relation to sight lines and existing geography to minimise adverse visual impact.	features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects.
SePC-007	Landscape and Visual	We would reiterate that the placement of PV panels at sites 1; 2; 4A, B (partial); 5A, B; and 7A, C ,F (identified as grade 2 agricultural classification), should be avoided and this would thereby reduce the visual impact of the scheme around a number of south Norfolk villages.	The Applicant acknowledges the Scheme would introduce a series of new features into the rural landscape. The Applicant has sought to minimise adverse effects on the landscape and its features, and the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape features to support landscape integrating and visual screening of the Scheme. The Applicant considers that the Landscape and Visual Assessment presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has been undertaken in accordance with the appropriate guidelines, it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme.

ID	Theme	Representation	Applicant's Response
			The Applicant has sought to reduce the use of BMV land where practicable taking into consideration the design other consideration for the scheme such as flood risk, ecology and grid connection as set out in the **Design Approach Document [APP-212].** The likely significant effects of the Scheme have been assessed within the **ES [APP-036** to **APP-195]** and the planning balance considering the likely effects are set out in the **Planning Statement [APP-210]**.
SePC-008	Arboriculture Ecology and Biodiversity	Preservation of existing native trees, hedgerows, pastures and associated water bodies is a critical aspect of the scheme: not only to minimise any adverse visual impacts but to preserve and enhance local ecosystems. We would like to emphasise that paragraphs 4.2.60 et seq. within the Environmental Statement Volume 3: Appendix 8.1 – Ecological Desk Study and Extended Habitat Survey Revision 1 March 2026 identify the quality and species diversity within the site areas relevant to Seething Parish Council. Consequently, the necessity of measures described in section 3 of	The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [APP-213]** and as 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

ID	Theme	Representation	Applicant's Response
		Outline Landscape and Ecology Management Plan Revision 1 March 2026 cannot be overemphasised.	converted to grassland mosaics, managed for the benefit of biodiversity including, but not limited to, species of farmland birds, including skylark Alauda arvensis. Further information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [APP-199].** Whilst there is no legislative requirement for the Scheme to provide quantifiable BNG, Requirement 9 of the Draft DCO secures a commitment to a minimum of 10% BNG. The Applicant has sought to embed 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]**.
SePC-009	Ecology and Biodiversity	Ecosystem / biodiversity: Throughout the pre-application phase we have emphasised that management of solar PV areas as meadow/ pasture	The Applicant welcomes the comment that management measures set out within the **Outline LEMP [APP-199]** are pertinent. As mentioned with the Outline LEMP, grazing is a management option

ID	Theme	Representation	Applicant's Response
		for grazing essential. Paragraphs 3.12.15-17; 3.13.9-11; and 3.15.10-4 within Outline Landscape and Ecology Management Plan Revision 1March 2026 are therefore highly pertinent. Regular herbicide spraying to manage growth is unacceptable.	which is being explored, alongside mowing. Further detail provided within the LEMP (secured by Requirement 7 of the **Draft DCO [AS-032])** and updated as appropriate in subsequent iterations. Herbicide may be used, but only where required to control injurious/invasive species. The application technique would look to minimise the use of herbicides as far a practical, e.g. through spot spraying. It is considered that this limited potential use of herbicides, is minor in comparison to the regular spraying of herbicides throughout the agricultural parcels within the Order Limits which is currently adopted as part of the intensive agricultural land management employed currently.
SePC-010	Soils and Agriculture	Anchorage and foundations for PV units must avoid or minimise damage to soils and in our opinion, ground screws or similar non-destructive / removable structures must be utilised rather than concrete foundations.	The proposed installation method for solar PV units does not involve concrete foundations below ground. This is described in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** section 15.8.17 et seq.
SePC-011	Transport and Access	Rights of way: It is imperative that the proposed solar development does not impede existing public rights of way: ideally the development should enhance public rights of way through rural areas.	The interaction between the Scheme and the PRoW network has been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and the **Outline PRoW and Permissive Paths Management Plan [APP-203]**. Where temporary impacts are required during construction, appropriate management and

ID	Theme	Representation	Applicant's Response
		Relevant to sites: 10A-E in Seething is Wash Lane runs that runs west from Seething Road at Grid Ref: TM 31074 94780 to join Pound Lane and Woodton RB3 at Grid Ref: TM 29875 94959. This Norfolk CC Maintained Unsurfaced Road runs between / within sites 10A and 10B and in identified in APFP 5(2)(a); Application Document Reference 6.2.4.1 Figure 4.1 Indicative Masterplan Sheet 2.	mitigation measures are proposed to minimise disruption to users. No permanent closures of PRoWs are proposed and any routes temporarily affected during construction will be reopened following completion of the relevant works. The **Green Infrastructure Strategy [AS-005]** includes for visual screening and landscape integration to address and mitigate effects on PRoW. The proposed implementation, management, maintenance and monitoring of the landscape measures during construction and operation of the Scheme is detailed in the **Outline LEMP [APP-109]** and secured through a requirement of the **Draft DCO [AS-032]**. Enhancement along this path includes tree planting on existing hedgerow and linear tree belt planting to screen the Scheme. The road will also now connect to a permissive path, traverse north to south along the west of Seething Road.
SePC-012	Transport and Access	Solar development should similarly not impede historic rights of way, absent from the Norfolk County Council definitive map but clearly evident on older OS Maps (see OS maps 1946 revision; published 1951 for Seething).	The Applicant notes the comment regarding Hobbs Lane, Dairy Lane and Loxley Lane. The Applicant is liaising with NCC PRoW officers to establish the status of these identified routes in the context of the definitive map.

ID	Theme	Representation	Applicant's Response
		Relevant to the parish of Seething, these include: • Hobbs Lane running south from Harvey Lane at Grid Ref: TM 30429 95801 to join Pound Lane at Grid Ref: TM 29854 95164. This Historic byway runs within site 10C and is identified in APFP 5(2) (a); Application Document Reference 6.2.4.1 Figure 4.1 Indicative Masterplan Sheet 2 • Dairy Lane running east from Hobbs Lane at Grid Ref: TM 30721 96340 to join Upgate Road at TM 31384 96050. This Historic byway runs within site 10E and CRC14 and is identifiable as a hedge boundary in identified in APFP 5(2) (a); Application Document Reference 6.2.4.1 Figure 4.1 Indicative Masterplan Sheet 2. Access along this route should be preserved. • Loxley Lane running south from Harvey Lane at Grid Ref: TM 31001 95494 to join Wash Lane at Grid Ref: TM 30812 94885. This Historic byway runs within site 10B and is	Further information will be provided by the Applicant on receipt of this information from NCC.

ID	Theme	Representation	Applicant's Response
		identifiable as a hedge boundary in APFP 5(2) (a); Application Document Reference 6.2.4.1 Figure 4.1 Indicative Masterplan Sheet 2. However, the proposed site enclosure would preclude access along this historic right of way: this should therefore be amended.	
SePC-013	Transport and Access	The proposal for the creation of a new permissive path within the eastern aspect of Sub-Site 10B (para 5.2.4 Outline Public Rights of Way and Permissive Paths Management Plan Revision 1 March 2026) is welcomed. However, in view of our above comments regarding historic rights of way, the recognition of Loxley Lane as a right of way through site 10B would provide a preferable pedestrian, equestrian or cycle access route between Hobbs Lane and Wash Lane (see APFP 5(2) (a); Application Document Reference 6.2.4.1 Figure 4.1 Indicative Masterplan Sheet 2.).	The Applicant notes the comment regarding Loxley Lane. The Applicant is liaising with NCC PRoW officers to establish the status of this identified route in the context of the definitive map and the Scheme. Further information will be provided by the Applicant on receipt of this information from NCC.
SePC-014	Transport and Access	Highways: Within the Parish of Seething, and relevant to sites 10A-E and the	As stated within the **ES Volume 3, Appendix 11.1 - Transport Assessment (Part 1) [APP-174]**, the peak daily trip generation associated with Site 10

ID	Theme	Representation	Applicant's Response
		associated CRC14 are Harvey Lane and Upgate Road. These are small rural single carriageway roads unsuitable for significant HGV (and particularly oversize vehicle) loads. Any development as proposed in the application must not adversely impact upon local traffic, nor impact upon farms and businesses that are dependent upon access along B1332, Harvey Lane, and Upgate Road. Should the proposed development be undertaken, no construction of other HGV traffic would be permissible north along Upgate Road beyond the proposed access point to site 10E (APFP 5(2) (a); Application Document Reference 6.2.4.1 Figure 4.1 Indicative Masterplan Sheet 2)	(which is accessed via Harvey's Lane), is 7 HGVs and 26 cars/shuttles/LGVs. The percentage impact of this represents a 14% increase in total future baseline flows, and a 16% increase in HGV flows. These percentages do not exceed the thresholds identified in IEMA Guidance for where additional assessment should be undertaken. It is also noted that existing baseline HGV flows were recorded on this link, evidencing that HGVs use the road already. In addition, Table 2.4 of the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174]** details a summary of highway network characteristics. Harvey's Lane is noted to have varying road width with good overall visibility. The link is therefore considered suitable for HGVs. The Applicant notes that no vehicle movements are proposed further north on Upgate Road beyond the proposed access for Sub-Site 10E. Further detail on the assessment of likely effects, including an assessment of AIL movements and effects with respect to transport and access is shown in the **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**. It is also noted (and stated within the above documents) that the peak daily traffic forecasts represent a worst-case scenario, and traffic flows

ID	Theme	Representation	Applicant's Response
			on an average day will be lower. Construction for each site will also not be undertaken simultaneously, with activities being staggered across the programme. Site access design and swept-path analysis has also been undertaken, including accesses for Site 10, and are shown in Appendix C of the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]**. Management and mitigation measures are included within the **Outline CTMP [APP-201]** and include measures such as a vehicle booking system, adherence to designated vehicle routes and staff shuttle services to mitigate impacts on the Local Road Network.
SePC-015	Arboriculture	As we have previously emphasised in the tree survey included in our response to the developer's targeted consultation of October 2025, these rural roads are bounded by important mature native trees and species diverse hedgerows that must be protected. Widening of such routes with associated loss of trees and hedgerows to enable oversize vehicles is wholly unacceptable.	The Applicant confirms that the important mature native trees and species diverse hedgerows adjacent to these rural roads will be protected. There is not currently any road widening proposed on B1332 or Harvey Lane. Facilitation pruning may be required along Upgate Road to form a site access from an existing access point to site 10E, and the associated tree impacts will be minimal. Subject to detailed design, some vegetation pruning or removal may be required to facilitate the required visibility splays for site access points. The Applicant is committed to retaining trees and hedgerows as far as practicable, with trees and

ID	Theme	Representation	Applicant's Response
			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. 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. 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].**
SePC-016	Site Selection, Alternatives and Design Evolution Cumulative Schemes, In-Combination and Impact	Conclusion: Subject to factors detailed above (and in our earlier responses during the pre-application phase), Seething Parish Council are supportive of the concept of ground based solar development in South Norfolk. However, we would prefer a scheme of reduced scale (avoiding the loss of grade 2 farmland as detailed above). Finally, it is imperative that the impact of the East Pye proposal is considered in the context of other large scale solar PV schemes proposed across South Norfolk and East Anglia as a whole,	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 **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.

ID	Theme	Representation	Applicant's Response
		such that an imbalance between energy and food security does not arise, and that adverse effects upon existing ecosystems and biodiversity are minimised.	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. **ES Volume 3, Appendix 2.4 - Cumulative Schemes [APP-116]** details the cumulative schemes considered within the ES. Each technical chapter within **ES Volume 1 [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]**. The Applicant will be submitting a DCO Interrelationship Report into the Examination.

2.14 Shelton and Hardwick Parish Council

Table 2.14 Applicant's Response to Shelton and Hardwick Parish Council [RR-1761]

ID	Theme	Representation	Applicant's Response
SHPC-001	Soils and Agriculture	Agricultural land should not be used for solar panels. The land would be removed from food cultivation for 60 years. There would then be the cost of reinstatement due to the necessity to remove the concrete, metal and other materials used in the construction and installation of the solar panels.	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 (paragraphs 2.10.21 and 2.10. 22). NPS EN-3 recognises that, at scale, developments may use some agricultural land (paragraph 2.10.23). Non-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]**. Solar farms do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. However, the Applicant does accept that they can limit opportunities for arable farming uses. **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]**

ID	Theme	Representation	Applicant's Response
			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 agricultural land within Norfolk, and 1.2% of South Norfolk agricultural land. In accordance with the **Outline SRMP [APP-204]** which includes measures to manage soils as a resource and minimise adverse impacts, a detailed SRMP will be submitted to and approved by the relevant planning authority, as secured by a Requirement 18 in the **Draft DCO [AS-032]**. All financial risks associated with the construction, operation, and decommissioning of the Scheme are borne entirely by the developer.
SHPC-002	Landscape and Visual	The negative impact on the countryside and enjoyment of the rural environment due to the industrial nature of the solar panels and connecting infrastructure.	The Applicant notes the Parish Council's concerns regarding the visual impact of the Scheme. Effects on the countryside and rural environment are assessed in **ES Volume 1, Chapter 7 – Landscape & Visual [APP-043]**,. The design response including sensitive siting, retention of vegetation, new planting and use of muted colours is set out in the **Design Approach Document [APP-212]** and **Design Principles,**

ID	Theme	Representation	Applicant's Response
			Parameters and Commitments [APP-213]. Landscape mitigation is secured through the **Outline LEMP [APP-199]** and Requirement in Schedule 2 of the **Draft DCO [AS-032].**
SHPC-003	Public rights of way and recreation	The impact on the footpaths and the negative impact on the well being of the residents and visitors.	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].** A 15m buffer to PRoW/bridleways has been incorporated into the design of the Scheme, as secured through the **Design Principles, Parameters and Commitments [APP-213]**. In addition, permissive paths and community accessible space would be created within the Scheme, as secured through the **Outline LEMP [APP-199]**. **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** considers fear and intimidation on non-motorised users on roads. Measures to manage traffic and access are provided in the **Outline CEMP [APP-196]**, **Outline CTMP [APP-201], Outline OEMP [APP-197]** and **Outline OTMP [APP-202].** An **Outline PRoWPPMP [APP-203]** has also been prepared which provides an assessment of PRoW and permissive paths, including bridleways, during construction, operational,

ID	Theme	Representation	Applicant's Response
			and decommissioning phases. The PRoW management measures will be developed further in the detailed **PRoWPPMP** to be secured by Requirement 17 of the **Draft DCO [AS-032]**. With specific regard to community liaison, this is directly secured through Requirement 4 of the **Draft DCO [AS-032]** through the provision of a community liaison group. This group will act as an intermediary between the public and the construction contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.
SHPC-004	Transport and Access	The installation of the solar panels over a very wide area requiring miles of connecting cables and considerable number of HGV traffic movements including along narrow rural lanes.	During the design process, consideration was given to limiting traffic movements through communities as far as practicable, together with considering the most suitable access routes and locations. Factors considered are set out in **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**, which includes the internalisation of construction haul routes, where possible, to minimise impacts. Measures also include the use of a vehicle booking system and vehicle holding areas to proactively manage construction vehicle movements to site and ensure impacts on the rural and local road network are reduced where

ID	Theme	Representation	Applicant's Response
			practicable, as described in the **Outline CTMP [APP-201]**. The proposed access strategy has been designed and developed in consultation with NCC as the Local Highway Authority. Highway Works will support the safe movement of construction vehicles along narrower sections of the local road network and reduce potential disruption to the public highway. The Highway Works will contain localised improvements to deteriorated road edges or temporary highway and traffic works. Highway Works that have provisionally been identified where the Abnormal Indivisible Loads (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 **APP-177]**. Mitigation measures are also set out in the **Outline CTMP [APP-201]** to reduce, as far as practicable, the impacts of the Scheme on the local road network. In accordance with Requirement 15 of the **Draft DCO [AS-032]** a detailed CTMP will be submitted to and approved with the relevant

ID	Theme	Representation	Applicant's Response
			planning authority that must consult with the relevant highway authority.

2.15 Shotesham Parish Council

Table 2.15 Applicant's Response to Shotesham Parish Council [RR-1771]

ID	Theme	Representation	Applicant's Response
SPC-001	General	Introduction 1.1 Shotesham Parish Council objects to the inclusion of Sites 8A and 8B within the East Pye Solar application, and this is our principle reason for submitting this representation. 1.2 In addition, we object to the full East Pye Proposal which appears to be a particularly ill-considered solar scheme that will deliver significant harm to the South Norfolk landscape and to local residents. 1.3 In this representation, we refer to documents submitted to the Planning Inspectorate under different registrations and also to a third document that will be submitted by email by the Parish Council. These documents are: • Objection to East Pye Solar – Land Parcel 8 (Sites 8a and 8b) submitted by Shotesham Parish Council "Our Objection")	The Applicant notes Shotesham Parish Council's objection to Sites 8A and 8B and the wider Scheme, and acknowledges the accompanying reports referenced in the representation. The Applicant has provided detailed responses to these points below.

ID	Theme	Representation	Applicant's Response
		• East Pye Solar – Site 8, Shotesham - Landscape & Visual Matters produced by Classic Landscape Architecture and submitted by Lisa Finch (PI Reference number: (Redacted)) ("LVM Report") • East Pye Solar Farm – Land South of Shotesham All Saints – Flooding Issues and Drainage Assessment (October 2025) produced by Create Consultancy and submitted by Jill Guy (PI Reference number: (Redacted)) ("Flood Report")	
SPC-002	Planning, Policy Compliance	Objection to Land Parcel 8 2.1 There are many site specific factors for Sites 8A and 8B and we believe these sites must be considered independently from the rest of the East Pye proposal. Considered independently, this area represents a solar site that would usually be considered by the Local Planning Authority. While the LPA has approved a number of smaller solar schemes that feed into the National Grid, Land Parcel 8 has very different characteristics to most local schemes in terms of the topography and	The Applicant notes the request that Sites 8A and 8B be considered independently. As set out in the **Planning Statement [APP-209]** and **Statement of Need [APP-206],** the Scheme is a Nationally Significant Infrastructure Project with an anticipated generating capacity of approximately 500 MW and is properly considered as a whole under the Planning Act 2008. The **Site Selection Assessment [APP-215]** documents how the Scheme, including Site 8, has been evaluated against planning, environmental and technical constraints, in accordance with paragraphs 2.10.10 to 2.10.40 of NPS EN-3. Effects on flood risk, landscape, private water supplies,

ID	Theme	Representation	Applicant's Response
		landscape of the area, the level of flood risk, the difficulty of accessing the site and the impact on private water supply and groundwater risk.	groundwater and access have been assessed within **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**, **Chapter 9 – Water Environment [APP-045], Chapter 11 – Transport and Access [APP-047]** and **Chapter 16 – Ground Conditions [APP-052]**, informed by the **ES Volume 3, Appendix 9.1 – Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** and **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184 to APP-186]**.
SPC-003	Landscape and Visual	2.2 Landscape Matters 2.2.1 The evidence presented in the LVM Report demonstrates that Land Parcel 8 occupies one of the most environmentally and visually sensitive locations within the Scheme. The Site forms an integral component of the Tas Beck valley landscape and contributes significantly to local landscape character, the rural setting of Shotesham, public amenity, ecological connectivity and the appreciation of the wider historic landscape. These characteristics collectively create a highly sensitive receiving environment	The Applicant notes the Council's response. The **Site Selection Assessment [APP-215]** documents how the Scheme, including Site 8, has been evaluated against planning, environmental and technical constraints, in accordance with paragraphs 2.10.10 to 2.10.40 of NPS EN-3. At Site 8 as acknowledged in **ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119]**, a number of factors have influenced the overall judgement on the high sensitivity. A judgment of high sensitivity does not preclude development, however as part of the iterative design process it is a consideration in

ID	Theme	Representation	Applicant's Response
		that is poorly suited to large-scale solar development.	determining the appropriateness for development. At Site 8 the extent of development has reduced in scale to the Scheme previously consulted on reflecting feedback and includes the implementation a range of mitigation measures as shown on the **Green Infrastructure Strategy [AS-005].** At Site 8B solar development has been excluded on rising landform to the north and west and within close proximity to the residential receptors on Market Lane. Landscape measures have been proposed to reinforce existing tree features on existing filed boundaries and screen the remaining part of the Site 8B which is proposed for solar development. Overall, 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.
SPC-004	Landscape and Visual	2.2.2 The assessment identifies substantial adverse effects on landscape character and visual amenity. The Site is	NPS EN-1 states at para 5.10.5 that '*Virtually all nationally significant energy infrastructure projects will have adverse effects on the*

ID	Theme	Representation	Applicant's Response
		highly visible from a number of public viewpoints, including well-used Public Rights of Way, and forms part of a distinctive valley landscape whose openness, tranquillity and rural qualities would be fundamentally altered by the introduction of extensive solar infrastructure. The report concludes that the resulting effects would be significant, long-term and, in many respects, irreversible for the duration of the project.	*landscape'*, and at para 5.10.13 that '*All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites*'. The Applicant acknowledges that the Scheme would introduce changes to the landscape and visual amenity. It is considered by the Applicant for the reasons set out in the **Planning Statement [APP-209]** that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. The Applicants Landscape and Visual Assessment presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has been undertaken in accordance with the appropriate guidelines it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The Applicant acknowledges the Scheme would introduce a series of new features into the rural landscape however the Applicant considers at worst this would result in moderate adverse effects in the long term which are reversible as reported in **ES Volume 3, Appendix 7.3 – Landscape Assessment Tables [APP-120]** and **ES**

ID	Theme	Representation	Applicant's Response
			Volume 3, Appendix 7.3 – Visual Assessment Tables [APP-147]. The Applicant has sought to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme through considered siting of new features and where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme. Embedded mitigation measures also include the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation. Collectively these measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects. These measures are set out in **ES Volume 1, Chapter 7 – Landscape & Visual [APP-043]**.
SPC-005	Water Environment - Water Quality, Drainage and Flood Risk	2.3 Flood Risk 2.3.1 The Flood Report highlights that sites 8A and 8B sit either side of the River Tas along Market Lane. This area is known to be highly susceptible to flooding during periods of intense rainfall. This is because this land is situated within the catchment area of a tributary of the River Tas. This tributary traverses through this low-lying land, serving as a	The Applicant notes this comment and the concerns in relation to flooding history in proximity to Sub-Sites 8a and 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 that are located outside of areas of Flood Zones 2 and 3, and outside of areas of higher surface water flood risk as far

ID	Theme	Representation	Applicant's Response
		natural collection point for any surface water runoff (overland flow) from the surrounding higher ground, including Land Parcel 8. During heavy rainfall events, the stream's in-channel capacity is frequently overwhelmed, leading to overtopping and the flooding of agricultural fields and the inundation of Market Lane. 2.3.2 The watercourse is a "flashy" catchment meaning it reacts quickly with alarming speed and force to rainfall events, often resulting in sudden and severe flood incidents. Historical data and photographic evidence confirm the recurring nature of this problem. Significant flood events occurred in January 2013, December 2019, and most notably on 23rd October 2023 (Figure 8 of Flood Report). The 2023 event caused widespread disruption, with images showing submerged roadways, inundated land, and blocked access routes. These are not small flooding events but cause significant disruptions. Overnight flooding on 23rd December 2020 was materially worse causing extensive damage around Market Lane and Brookfields (as well as in many our parts of South Norfolk).	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 ground across the panel fields will consist of a grass and/or wildflower meadow maintained at a suitable height as secured in the **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 surface water flood risk to downstream water receptors. Based on the above, the assessment within **ES Volume 1, ES Chapter 9 – Water Environment [APP-045]** concludes that impacts to water receptors are 'Not Significant', with the exception of the cessation of agricultural use/fertiliser or chemical application which is assessed as 'Significant Major Beneficial'.

ID	Theme	Representation	Applicant's Response
		There was no photographic image of these events which happened overnight. 2.3.3 It should be noted that flood risk is present in other parts of the village. At Falgate Farm, near Shotesham All Saints Church, the national flood risk summary for the property shows a medium risk of surface water flooding and a low risk of river flooding at present. The risk summary shows the surface water risk levels as high for the period 2040-60 and river water risk as medium for 2036-2069. 2.3.4 Figure 9.2 of the East Pye Flood Risk Assessment (APP/6.3.9.1) shows that the area covered by solar panels will all drain towards Market Lane and Market Lane Farm and can only increase the level of risk for this area in the most extreme events.	
SPC-006	Water Environment - Water Quality, Drainage and Flood Risk	2.3.5 The Flood Report raises concerns over the adequacy of modelling carried out by East Pye and, although there have been changes in the East Pye work, Figure 4 in the Flood Report shows Flood Risk in parts of Site 8A that have not been identified by East Pye.	The Applicant notes this comment and directs the respondent to SPC-005 above. The Applicant does not agree with the statement that flood risk in parts of Sub-Site 8A have not been identified. The Flood Report was prepared following the submission of the PEIR report and Preliminary Flood Risk Assessment. **ES**

ID	Theme	Representation	Applicant's Response
		2.3.6 The Objection includes a full analysis of flood risk and concludes that there is a credible risk of increased flood risk and deterioration of the water environment, and that compliance with policy has not been demonstrated.	**Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** sets out all sources of flooding across the Site, including Sub-Site 8A. The proposed use for Sub-Site 8A is 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]**. As such, flood risk has been robustly considered in relation to the masterplan and siting of infrastructure for Sub-Site 8A.
SPC-007	Transport and Access	2.4 Site Access 2.4.1 Access to Sites 8A and 8B is among the most constrained on the site. The sites are approved by narrow country lanes on which vehicles find it difficult to pass. The proposed HGV route to 8A and 8B runs for around 3.5 miles from the B1527 to the proposed site entrance.	As detailed within **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174]**, access to Sub-Sites 8A and 8B will be made via B1527, Shotesham Road, Woodton Road, Heath Road and Baxter's Lane. The peak daily trip generation for these sites is assumed to be 4 HGVs and 11 cars/ shuttles/ LGVS. As reported in Section 8 of **ES Volume 1, Chapter 11 - Transport and**

ID	Theme	Representation	Applicant's Response
		These are inappropriate locations for significant industrial areas.	**Access [APP-047]**, none of the links assessed were identified as experiencing significant adverse effects in respect of severance, delay, amenity, fear and intimidation, or accidents and safety. These findings are aligned with the methodology, thresholds and significance criteria set out in the relevant IEMA guidance. The Applicant recognises that some roads proposed as construction vehicle routes are rural in character. The route proposals have been developed through engagement with Norfolk County Council, and site access drawings have been prepared for every proposed access onto each site. Visibility splays and swept-path analysis has also been undertaken to assess feasibility of access via the proposed routes. Access drawings, visibility splays and swept-path analysis is detailed within Appendix C of **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]**.
SPC-008	Transport and Access	2.4.2 It is proposed to use Market Lane for the movement of HGVs between sites 8A and 8B – despite the fact that these sites share a boundary separated only by	Construction traffic routeing between Sub-Sites 8A and 8B includes a short section of Market Lane due to physical constraints relating to hedgerows and flood risk at

ID	Theme	Representation	Applicant's Response
		Shotesham Beck. Market Lane is little more than a metalled cart track – very narrow in places and with significant banks and hedges. At present, a traveller may meet as many people on foot, horse or cycle as motorised vehicles. The use of this lane by HGVs can be expected to cause significant risk to other road users and damage to the carriageway and to the hedges and trees that border the road. We consider that, as a minimum, the development should contain field access between Sites 8A and 8B and that Market Lane and Baxter's Lane should be closed to all construction traffic. 2.4.3 Chapter 12 of the Objection provides a full analysis of traffic impacts and concludes that traffic impacts provide another reason for removing Parcel 8 from the scheme.	Shotesham Beck, alongside the absence of suitable alternative routes. The area bisecting the two parcels is also classified as an avoidance area within the **Outline Cable Route Construction Statement [APP-216]** meaning trenchless crossing methods are proposed for the construction of this cable route section. The effects of construction traffic on Market Lane have been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, which concludes in Section 11.8 that the link does not have significant adverse effects on the road network with respects to severance, delay, amenity, fear, safety and hazardous and large loads. This is further supported by the proposed management and mitigation measures in the **Outline CTMP [APP-201]** which will minimise impacts on the Local Road Network. These measures will be further refined in a detailed CTMP, secured by DCO Requirement 15 of the **Draft DCO [AS-032]**, to be developed and agreed with Norfolk County Council, in its role as Local Highway Authority.

ID	Theme	Representation	Applicant's Response
SPC-009	Water Environment - Water Resources, Water Demand and Supply	2.5 Private water supply and ground water risk 2.5.1 Chapter 7 of the objection identifies the risk to private drinking water supply at Market Lane Farm and six properties on Baxter's Lane. The risks appear to be greatest at Market Lane Farm due to the local topography which shows a direct pathway between Land Parcel 8 and the borehole. Despite the borehole at Market Lane Farm being identified during consultation, no site specific investigation or site visit has been undertaken. 2.5.2 There are clearly potential risks to human health, and to the wider water system, and insufficient information to conclude that the development of Land Parcel 8 would avoid unacceptable harm. In the absence of further site specific investigations, this weighs strongly against the inclusion of Land Parcel 8.	As recognised by Chapter 7 of the objection, the private water supplies within the 250m Study Area around Sub-Sites 8A and 8B have been assessed, and the properties with Private Water Supplies (PWS) identified in Figure 7.3a of the objection appears to correlate to the locations of the 10No. private and permitted water supplies, and BGS water wells, used to undertake the assessment within the **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]** and **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]**. As described in Table 3.11 of the **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]**, where borehole logs are available, and where information has been provided during consultations, the boreholes within the Sub-Site 8A and 8B Study Areas are (or are assumed, based on the geology) to extract water from the chalk at depths of between approximately 20m and 45m below ground level. The geology overlying the chalk in this area comprises Diamicton, which is predominantly

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			cohesive and as shown on **ES Volume 2, Figure 16.4 - Diamicton Thickness [APP-108]** extends to a thickness of approximately 20m in the area of Sub-Sites 8A and 8B. It is recognised that the composition of Diamicton can be variable, however a laterally or vertically extensive groundwater body is not anticipated to be present. Ground investigation will be undertaken post-consent to confirm the assumptions made. The **Outline CEMP [APP-196]** includes commitments (secured by DCO Requirement 13) to undertake ground investigation and states that "*The results of the ground investigation will be used to inform the detailed design of the Scheme*". The proposed works in Sub-Sites 8A and 8B comprise PV arrays with shallow foundations (maximum 4m deep) and will therefore not interact (on the basis of the geology encountered within the abstraction boreholes) with the underlying aquifers from which the private water supplies appear to abstract. Whilst a Source of Potential Contamination (SPC) has been identified within Sub-Site 8B

ID	Theme	Representation	Applicant's Response
			(SPC8 - Former 'Market Lane Pit'), as shown on **ES Volume 2, Figure 16.3 - Sources of Potential Contamination [APP-107]**, Sheet 2 of the **Works Plan [AS-002]** shows that the only works in the area of the SPC will be Works 10 - "*works to create and maintain habitat management areas*". These works will not be capable of creating an impact which could lead to any effects on PWS. Embedded mitigation for the management of pollution risk to receptors (leaks/spills/contaminants in surface water runoff), including private water supplies and the River Tas 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 conclusion, risks to the PWS within the Study Area around sub-Sites 8A and 8B have not been identified as:

ID	Theme	Representation	Applicant's Response
			• The PWS abstract from the chalk at significant depth beneath the overlying Diamicton. • The works within Sub-Sites 8A and 8B will not penetrate the Diamicton, and ground investigation will be undertaken to confirm the design. • The works within Sub-Site 8B will not involve ground disturbance that could mobilise contamination from the former Market Lane Pit (i.e., the baseline is maintained). • Embedded mitigation for pollution management for all phases of the Scheme is provided to manage the risk of pollution incidences to water receptors.
SPC-010	Ecology and Biodiversity	2.6 Other Material harms 2.6.1 The objection identifies other material harms which also weigh against the inclusion of Land Parcel 8: • The incomplete and inadequate assessment of the risks to the highly sensitive ecological system around the area which includes two SSIs, a	**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 including birds, bats, and aquatic ecology. The Applicant's position is that the assessment has been undertaken in accordance with the appropriate guidelines

ID	Theme	Representation	Applicant's Response
		roadside reserve, colonies of Western Barbastelle bats (a European Protected Specie), many vulnerable farmland bird species and significant aquatic ecology.	and is robust and appropriate for the assessment of the Scheme. 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, including skylark *Alauda arvensis*. Further information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [APP-199].**

ID	Theme	Representation	Applicant's Response
SPC-011	Soils and Agriculture	• Inadequate assessment of the risks to Best and Most Versatile Farmland.	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 (paragraph 2.10.21-22). NPS EN-3 recognises that, at this scale, developments are likely to use some agricultural land (paragraph 2.10.23). 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 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]**.

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			Solar farms do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. **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. The **Outline SRMP [APP-204]** includes measures to manage soils as a resource and minimise adverse impacts, and a detailed SRMP will be submitted to and approved by the relevant planning authority, as secured by a Requirement 18 in the **Draft DCO [AS-032]**.
SPC-012	Transport and Access Recreation	• The proposed development will fundamentally change the experience of using public rights of way including Market Lane, Brooke Road, Baxter's Lane, Footpaths 18,19,22 and the Boudica Way. The experience can be characterised as open views across agricultural land with limited visual intrusion, and unusually high levels of tranquillity. Development will lead to a much greater sense of	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 – Residential Visual Amenity Assessment [APP-148]**. The design of the Scheme has been informed by an environmentally led approach, with

ID	Theme	Representation	Applicant's Response
		enclosure, with more limited views and much greater visual intrusion. These factors have not been adequately assessed and weigh against the inclusion of Site in the scheme. (Chapter 11 of Objection).	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 proposed implementation, management monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [APP-199]** through Requirement 7 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

ID	Theme	Representation	Applicant's Response
			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.
SPC-013	Site Selection, Alternatives and Design Evolution	2.7 Site Selection 2.7.1 The East Pye Site Assessment process appears highly flawed and has not been constructed around the actual Point of Contact at Great Moulton. Chapter 5 of the Site Selection Assessment (APP/7.20) explains the 3 different processes undertaken by East Pye: • Process A is explained in paragraphs 5.1.3 to 5.1.9. This sets out the process actually followed to identify the sites proposed on the assumption that the Grid Point of Connection would be Norwich Main. • Process B is explained in paragraphs 5.1.10 to 5.1.28. This was an attempt to identify alternative sites given that the Point of Connection was to be Great Moulton.	The **Site Selection Assessment [APP-215]** sets out the approach to site selection and the consideration of potentially reasonable alternative sites, 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 section 2.10 of NPS EN-3, and the Applicant considers that it has demonstrated compliance with the relevant site selection criteria set out in NPS EN-1, NPS EN-3 and NPS EN-5. The sites selected for the Scheme have been subject to detailed assessment within the **ES**

ID	Theme	Representation	Applicant's Response
		• Process C is explained in paragraphs 5.1.29 to 5.1.34. 2.7.2 We note that no dates have been given for any of this work and there is nothing stated about the process for verifying the results. This seems relevant given the site selection appear flawed and inconsistent, and appears to have been produced to fit the answer wanted.	**[APP-036 to APP-195]**. The overall planning balance, with consideration of the likely effects from the Scheme, is set out within the **Planning Statement [APP-209]**. 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 Applicant therefore considers that the sites selected have been subject to a robust and transparent process of environmental assessment which verifies their suitability for the Scheme.
SPC-014	Site Selection, Alternatives and Design Evolution	2.7.3 Considering Process A: i) Figure 7 is incorrectly shaded. This can be seen by comparison with Figure 8. ii) Parts of Land Parcel 8 clearly have gradients of >3% and the site also includes some Grade 2 land. Yet the site appears be acceptable in Figure 8. This result needs review and independent verification.	The Applicant notes this comment. As explained at paragraph 4.4.3 of the **Site Selection Assessment [APP-215]**, flatter land is generally considered to be optimal with a gradient of 3% or less preferred. This is not however absolute. **ES Volume 2 Figure 5.1 Environmental Constraints and Key Features [APP-062]** shows that the majority of land within the Order Limits is below 3%, and that site selection has avoided steeper areas within the wider area**. ES Volume 2, Figure 7.3 – Topography Plan** further shows topography

ID	Theme	Representation	Applicant's Response
			within the Order Limits and surrounding landscape. As set out within the **Design Approach Document [APP-212]** and within the Applicant response at SPC-116, the design evolution of the Scheme includes consideration of topography with elevated and rising landforms avoided from development. At Site 8B this approach is evident where solar development has been excluded on rising landform to the north and west with landscape measures proposed to reinforce existing tree features (as defined on the **Green Infrastructure Strategy [AS-005]**) and screen the remaining part of the Site which is proposed for solar development. Collectively the approach and measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects, and landscape and visual considerations are embedded into the design principles and design evolution of siting infrastructure. Figure 8 shows ALC Grade 3 Unconstrained Land and the EIA Scoping Boundary within 20km of Norwich Main Substation. Given the

ID	Theme	Representation	Applicant's Response
			limited extent of non-BMV land within the 20km search area from the Norwich Main Substation, the use of BMV land was inevitable as acknowledged by NPS EN-3 paragraph 2.10.23, and the Applicant therefore went on to consider Grade 3 agricultural land within the 20km search area. In respect of point ii) of the SPC Relevant Representation, Figure 8 shows where a limited area of Grade 2 ALC land (the unshaded area of the plan) overlaps with Site 8. However, the Applicant refers SPC to the results of the detailed ALC survey set out within **ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182]** and the plan at **ES Volume 2, Figure 15.1 - ALC Results [AS-010]**, which identify that Sub-Site 8B is subgrade 3b with an area of subgrade 3a.
SPC-015	Site Selection, Alternatives and Design Evolution	We believe Land Parcel 8 should have been excluded at this stage. iii) In paragraphs 5.17 and 5.18 it is suggested that sites were screened for accessibility and flood risk. If this were the case, we suggest Land Parcel 8 would have been excluded.	In respect of accessibility, the Scheme sites are accessible for construction traffic from the Strategic Road Network (SRN) via the A140. The **Outline CTMP [APP-201]** and the Transport Assessment within **ES Volume 3 [APP-174 to APP-177]** set out the detailed access arrangements to Site 8 and confirm that appropriate access to and from the SRN can be safely delivered, subject to the

ID	Theme	Representation	Applicant's Response
		iv) iv) As set out above, we do not believe Land Parcel 8 could ever have been appropriate for solar development as suggested in paragraph 5.19.	mitigation measures secured by Requirement 15 of the **Draft DCO [AS-032]**. In respect of flood risk, the proposed use for Sub-Sites 8A and 8B will be solar panels that are located outside of areas of Flood Zones 2 and 3, 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]**. As set out within the **Site Selection Assessment [APP-215]**, the land chosen for the Scheme has taken into account planning policy in respect of flood risk, as identified in this SSA, and sought to direct development to land at least risk of flooding. Most of the land within the Scheme sites is at low risk of flooding. It is recognised that parts of the Sites overlap with areas of Flood Zone 2 and 3. However, as set out within Appendix A of the **Planning Statement [APP-209]**, a sequential approach to the design process has been adopted and critical infrastructure has been located outside of Flood Zones 2 and 3.

ID	Theme	Representation	Applicant's Response
			The Applicant will make additional submissions in response to SPC'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.
SPC-016	Site Selection, Alternatives and Design Evolution	2.7.4 Process B appears entirely flawed: 1. It is limited to Grade 4/5 land, even though the Applicant had already decided (in Process A) that it was "essential" to use Grade 3 land. 2. A comparison between Figures 13 & 14 and say Figure 8 (from Process A) suggests that the wrong parameters may have been used to identify unconstrained land. 3. It is notable that Process B fails to identify most of the sites now being proposed by the Applicant. 4. A further new parameter appears to be introduced into this assessment – that the unconstrained land should be at	The Applicant notes the concerns raised regarding Stage 5 of the **Site Selection Assessment [APP-215]** (paragraphs 5.1.10 to 5.1.28), referred to by Shotesham Parish Council as "Process B". The Applicant draws attention to the purpose of this stage, which was to identify and evaluate potential alternative unconstrained non-BMV sites within 20km of the confirmed Point of Connection (PoC) south of Great Moulton, following the relocation of the PoC from Norwich Main Substation (noting Paragraph 2.10.23 of EN-3 which requires the Applicant to 'explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land'). The Applicant considered potential alternative unconstrained sites within 20km of the National Grid Substation.

ID	Theme	Representation	Applicant's Response
		least 40 ha in area. This requirement is not mentioned in Process A. 2.7.5 In paragraph 4.4.7, the Applicant explains that "the minimum area for an individual site for large scale solar is 40 ha of contiguous land". The topography of Land Parcel 8 suggests it would never have met the criteria of 40ha of unconstrained land had Process A been carried out correctly. The current proposal for the site amounts to c25ha of solar panels. Land Parcel 8 appears not to meet the applicant's own criteria.	In response to point 2, it is not clear which parameters are being referred to, and the Applicant notes that Figure 8 is shown with a study area drawn from Norwich Main, whereas the study area drawn for Figures 13 and 14 is from the proposed National Grid Substation. A comparison between Figures 13 and 14 and the unshaded areas within Figure 10 shows that the identification of PDAs has been determined by areas of non-Grades 1-3 BMV land. With regard to the assertion that Stage 5 was inconsistent because it excluded Grade 3 land, the Applicant draws attention to the fact that Stage 5 deliberately re-applied the Stage 2 constraints mapping to the new 20km search area from the PoC. As explained at paragraph 4.6.6 of the **Site Selection Assessment [APP-215]**, Figure 10 Planning and Environmental Constraints within 20km of the Point of Connection maps the planning and environmental constraints applied to the initial search area from Norwich Main Substation to a 20km radius from the PoC. The unconstrained land is shown by Figure 11 Unconstrained Land within 20km of the Point of Connection. As per the policy expectation set out in paragraph 2.10.21 of NPS EN-3 that 'poorer quality land should be

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			preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible' ALC Grades 1-3 were excluded from this mapping. This approach is consistent with the earlier stage of the assessment and reflects the sequential policy preference for non-BMV land. The Applicant further notes that Grade 3 land was not disregarded, but instead considered separately at Stage 6, as explained at paragraph 4.7.1 of the **Site Selection Assessment [APP-215].** Having not been able to identify suitable and available sites within the parameters defined for Stage 5, the Applicant went on to consider Grade 3 agricultural land within the 20km search area from the PoC. The output of the mapping exercise for this is shown on Figure 21 ALC Grade 3 Unconstrained Land. As was the case as illustrated in Figure 8 (which mapped ALC Grade 3 land from the Norwich Main Substation), this introduced a significant amount of land within the 20km search area from the PoC which could potentially accommodate solar development. The 40ha value is a mapping filter applied at Stage 5 to identify potential alternative individual land parcels of sufficient size to

ID	Theme	Representation	Applicant's Response
			form viable building blocks which, in combination, could deliver the approximate 1,100ha needed to accommodate a 500MW scheme. This reflects the operational reality set out at paragraph 5.6.3 of **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**, which explains that to meet the 500MW of the Grid Connection Agreement, an area of approximately between 500ha to 810ha was a starting point to accommodate the panels itself. The Applicant searched for an area of approximately 1,100ha to accommodate the Solar PV Array, along with associated infrastructure such as substations, Battery Energy Storage System (BESS), access, landscaping and biodiversity measures, together with a Cable Route Corridor (CRC). The 40ha filter was therefore not applied as a project-wide threshold that each individual constituent site within the Order Limits must meet, but as a mapping tool to identify unconstrained parcels large enough to form part of a viable land assembly for the alternatives assessment. With regard to Site 8 (referred to by the respondent as Land Parcel 8), the Applicant draws attention to the fact that Site 8,

ID	Theme	Representation	Applicant's Response
			together with Sites 1–10, forms part of a wider land assembly of c.1,100ha secured through voluntary landowner agreements. As explained in **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**, Sites 1-10 and the BESS site, are all secured through voluntary landowner agreements. The Applicant further notes that Stage 5 did not fail to identify the Scheme's proposed sites because those sites had already been identified through Stages 3 and 4 and were secured by voluntary agreement; Stage 5 was instead a validation exercise to test whether any unconstrained alternative site or combination of sites within 20km of the PoC was more suitable and available. As concluded at paragraph 4.6.11 of the **Site Selection Assessment [APP-215]** *'Ultimately, as explained in the assessment of the PDAs later in this report, following the Stage 5 evaluation, none of the PDAs proved suitable for development due to the constraints being identified. On this basis, the Applicant proceeded to consider potential areas of Grade 3 Agricultural land in the search area, as set out at Stage 6 below.'*

ID	Theme	Representation	Applicant's Response
SPC-017	Site Selection, Alternatives and Design Evolution	2.7.6 Process C has identified large tranches of land that are probably appropriate for solar, much closer to the Point of Connection than Land Parcel 8. There is no evidence that the Applicant has undertaken any activity to promote the scheme to the relevant local landowners or indeed if the work was undertaken in time to allow any such activity. These sites may well demonstrate materially lower harms than Land Parcel 8 and other sites in the DCO application. 2.7.7 It appears that if the initial assessment had been undertaken correctly in Process A, Land Parcel 8 would not be part of this application. 2.7.8 We believe that the Applicant has not taken a robust approach to site selection (as claimed in 6.1.1). There is no evidence to suggest that Land Parcel 8 is a more reasonable site than the sites within ADZ1-4 that have not been assessed in detail.	Stage 6 of the **Site Selection Assessment [APP-215]** (referred to as "Process C") involved the identification of Alternative Development Zones (ADZs) closer to the Point of Connection. The Applicant draws attention to the purpose of Stage 6, which was to consider previously discounted Grade 3 agricultural land within the 20km search area from the PoC, following the conclusion at Stage 5 that no suitable and available unconstrained (non-BMV) alternative sites had been identified in compliance with NPS EN-3 Paragraph 2.10.21 - 2.10.23. As explained at paragraph 4.7.2 of the **Site Selection Assessment [APP-215]**, land availability (i.e. the participation, or willingness of landowners to be involved in the Scheme) is a key consideration for site selection because it is typical for the land to be leased rather than permanently acquired. In accordance with the 'Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land', the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. Consistent with that guidance, the Applicant has sought to

ID	Theme	Representation	Applicant's Response
			acquire the relevant land by voluntary agreement, with compulsory acquisition powers sought only where necessary to deliver the Scheme. Further details of this approach are set out in the **Statement of Reasons [APP-018]**. The Applicant had identified sites suitable for the Scheme in consideration of the 'Factors influencing site selection and design' set out within Section 2.3 of NPS EN-3 at paragraphs 2.10.10 – 2.10.64. Whilst land within the ADZs may be suitable for solar development, they were not considered to be reasonable alternatives to the Scheme, given that the land within them has not been made available to the Applicant. Although the ADZs are identified as unclassified Grade 3 land by Natural England's Provisional ALC Grade mapping, it is considered likely that the proportion of BMV land would be similar to that of the Sites which benefit from detailed ALC surveys. It is not considered appropriate or proportionate to undertake surveys for the large areas of Grade 3 surrounding the PoC to determine their ALC grade which may not be available for the Scheme. The Predictive Agricultural Land Classification Map for

ID	Theme	Representation	Applicant's Response
			England, published by Defra in May 2026, and which supersedes the provisional maps further indicates that land around the PoC within the identified ADZs is Grade 3a, with large areas of likely ALC Grade 2 to the north west and south east of the PoC, which are avoided by the Scheme. With regard to the assertion that Site 8 would not have formed part of the Scheme had the initial assessment been undertaken differently, the Applicant draws attention to Section 5 of the **Site Selection Assessment [APP-215]**, which sets out the Applicant's evaluation of the selected Sites (including Site 8) against the criteria of NPS EN-3, including ALC and land type, accessibility, PRoW, ecology, landscape and visual, land use, cultural heritage, and flood risk. The Applicant further draws attention to the design evolution of Site 8 described in the **Design Approach Document [APP-212]**, including Solar PV Arrays removed from Flood Zones 2 and 3 in Sub-Site 8A and Solar PV Arrays removed from the northern part of Sub-Site 8B owing to the elevated topography and the prominence of the landscape on the setting of listed buildings, demonstrating that Site 8 has been refined

ID	Theme	Representation	Applicant's Response
			through an iterative, environmentally-led design process. The Applicant considers the site selection process to have been robust, proportionate, and consistent with the policy expectations set out in NPS EN-1 and NPS EN-3.
SPC-018	Consultation and Engagement	2.8 Consultation History & Conclusion 2.8.1 Shotesham Parish Council has engaged in every stage of the East Pye consultation process and have throughout explained our fundamental belief that Land Parcel 8 is entirely inappropriate for the construction of a solar site. At every step, the applicant has made further changes to improve the perceived risks and harms from the proposal. However, these amendments do not suddenly turn an inappropriate site into an appropriate site, and nor will further mitigation.	The Applicant welcomes the engagement it has had with Shotesham Parish Council during the pre-application process and welcomes further engagement through the Examination stage. The Applicant has responded to the specific points raised above and below.
SPC-019	Site Selection, Alternatives and Design Evolution	2.8.2 Land Parcel 8 now fails to meet East Pye's own criteria for inclusion in the scheme, and the developer's own analysis identifies many potential sites much closer to the agreed Grid Point of Connection which are likely to more appropriate for solar development.	Please refer to the responses provided above from reference SPC-013 to SPC-017. The alternative sites closer to the Point of Connection referred to were considered as four Alternative Development Zones (ADZs) within 20km of the PoC. The **Site Selection Assessment [APP-215]** concludes that

ID	Theme	Representation	Applicant's Response
			whilst land within these areas could potentially contribute to, or accommodate, the Scheme, no site was found to be available to the Applicant, and no site was identified as being more suitable or more preferable than the land within the Order Limits. In any event, paragraph 4.3.9 of NPS EN-1 confirms that the national policy does not impose any obligation "*to establish whether the proposed project represents the best option from a policy perspective*". The Applicant must demonstrate compliance with the national policy against each of the considerations set out within that policy. Section 2.3 of NPS EN-3 sets out the factors influencing site selection and design, and Section 2.10 sets out, at paragraphs 2.10.10 – 2.10.64, the factors that are likely to influence the key considerations involved in the siting of a solar farm. These include irradiance and site topography, availability of grid connection, proximity of a site to dwellings, agriculture land classification and land type, accessibility, and capacity of a site. The Applicant's approach to selecting suitable Sites against each of these factors is set out in the **Site Selection Assessment [APP-215]**. For example, land availability (i.e. willing landowners) is a key consideration for site

ID	Theme	Representation	Applicant's Response
			selection. In accordance with the Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land, the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. Consistent with that guidance, the Applicant has sought to acquire the relevant land by voluntary agreement, with compulsory acquisition powers sought only where necessary to deliver the Scheme. Further details of this approach are set out in the **Statement of Reasons [APP-018]**.
SPC-020	Site Selection, Alternatives and Design Evolution	2.8.3 We consider the inclusion of Land Parcel 8 results in significant, wide-ranging adverse impacts, and policy conflict and is not justified in planning terms, given the evidence presented. The Examining Authority is respectfully requested to recommend that Development Consent is not granted for Sites 8a and 8b, and the Order Limits are amended to exclude these areas. The exclusion of this relatively small site should have limited impact on the viability of the scheme, given the potential	The Applicant refers to its responses to SPC-013 to SPC-017. The Applicant further draws attention to the fact that the design of Sites 8A and 8B has been refined through 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]**. This has included the removal of Solar PV Arrays from Flood Zones 2 and 3 within Sub-Site 8A, removal of Solar PV Arrays from a field adjacent to Ringers Grove Ancient Woodland

ID	Theme	Representation	Applicant's Response
		opportunity to identify alternative sites nearer the Point of Connection.	and from a discrete parcel of Grade 2 BMV land within Sub-Site 8A, and the removal of Solar PV Arrays from the northern part of Sub-Site 8B (in response to feedback from Historic England and other stakeholders) to avoid infringement on the setting of the Grade II listed Upgate Green Farmhouse. Internal haul routes are also proposed to connect Sub-Sites 8A and 8B to minimise construction vehicle movements on the local road network. Additional design refinement has resulted in a new permissive route being provided at Sub-Site 8B, strengthening the network of greenways and active connections within the landscape. The likely significant effects of the Scheme, including at Sites 8A and 8B, have been assessed throughout the **ES [APP-036 to APP-195]**, and the Applicant's position in relation to the planning balance is set out in the **Planning Statement [APP-209]**.
SPC-021	General	Objection to Overall Scheme 3.1 Shotesham Parish Council does not oppose solar schemes in principle, and we have made no specific objection to other parts of the Scheme which are sited in our Parish.	The Applicant notes this comment. The likely significant effects of the Scheme during the construction phase are assessed throughout the **ES [APP-036** to **APP-195]**, including effects on transport and access, noise and vibration, air quality, landscape and

ID	Theme	Representation	Applicant's Response
		3.2 However, we do oppose the East Pye proposals in aggregate which we believe are poorly thought through and will cause material harm to local communities and landscapes over an extended area. We support the work of Block East Pye Solar (BEPS) and agree with their objections to the East Pye Scheme.	visual, heritage, ecology and biodiversity, and local communities. As part of the assessment, appropriate mitigation measures have been developed and are incorporated into the Scheme. Measures are secured in the **Outline CEMP [APP-196]**, **Outline CTMP [APP-201]** and the **Outline Public Rights of Way and Permissive Paths Management Plan (Outline PRoWPPMP) [APP-203]**. 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. 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. As set out in the **Planning Statement [APP-209]**, having had regard to all important and relevant matters, the Applicant has concluded

ID	Theme	Representation	Applicant's Response
			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 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 **Statement of Need [APP-206]** also 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.
SPC-022	Soils and Agriculture Transport and Access	3.3 Our objections to the scheme include: • The loss of so much Best and Most Versatile Land. • The widespread impacts on public rights of way across a large area of South Norfolk.	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 (paragraph 2.10.21-22). NPS EN-3 recognises that, at scale, developments

ID	Theme	Representation	Applicant's Response
	Cumulative Schemes, In-Combination and Impact	• The cumulative impact of East Pye and other energy schemes in South Norfolk. The focus of these schemes of the area immediately South of Norwich Main is having a disproportionate effect on these communities.	may use some agricultural land (paragraph 2.10.23). BMV land was considered during site selection, 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 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]**. Solar farms do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. Additionally, decommissioning is expected to occur after the 60-year design life of the Scheme; the Sites would be decommissioned and the land returned to the landowner (the National Grid Substation and the Grid

ID	Theme	Representation	Applicant's Response
			Connection Infrastructure would remain in situ). Post-decommissioning, the landowners would choose how the land is to be used and managed, with the exception of the National Grid Substation and the Grid Connection Infrastructure. The landowner may return all of the land to agricultural use, although it is likely that established habitats such as hedgerows and woodland would be retained, given their potential benefits to agricultural land and the wider farming estate. **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]** presents an assessment on agricultural land quality, soils, local agricultural businesses, food production the rural economy, including consideration of the economic and other benefits of BMV land, in accordance with planning policy. The **Outline SRMP [APP-204]** includes measures to manage soils as a resource minimise adverse impacts. A detailed SRMP will be submitted to and approved by the relevant planning authority, as secured by a Requirement 18 in the **Draft DCO [AS-032]**. The assessments within the **ES [APP-036** to **APP-195],** including effects on PRoW, have considered the components of the Scheme as a whole, including the National Grid

ID	Theme	Representation	Applicant's Response
			Substation and Grid Connection Infrastructure, the Project Substations and the BESS, together with the Solar PV Arrays and **Green Infrastructure Strategy [AS-005]**. The Applicant is aware of other projects in the region. The technical chapters of **ES Volume 1 [APP-042** to **054]** presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together may have an increased effect on the receptors presented in the ES.
SPC-023	Site Selection, Alternatives and Design Evolution	• The flawed nature of the site selection process (mentioned above) which has led to a scheme that appears to be impractical, complex and costly to implement and service.	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 set out in the **Site Selection Assessment [APP-215]**. This includes consideration of planning, environmental and operational factors in the search for suitable sites. These constraints have been informed by national policy on factors relevant to site selection for solar development as set out within NPS EN-1 and EN-3. Consideration has included both technical constraints (i.e. proximity to grid connection, site size, compatibility of land uses) and

ID	Theme	Representation	Applicant's Response
			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 likely significant effects of the Scheme have been assessed within the **ES [APP-036** to **APP-195]** and the Applicant's position in relation to the planning balance considering any residual harms against the overriding benefits are set out in the **Planning Statement [APP-210]**. The **Funding Statement [APP-021]** demonstrates how the Scheme can be funded; the **Outline CEMP [APP-196]** and **Outline CTMP [APP-201]** demonstrate how the scheme can be delivered. The Applicant does not consider the Scheme to be impractical, complex and costly to implement and service.
SPC-024	Socio-Economics	• While the construction phase may provide some additional local jobs, the staffing of the project in the	**ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** assesses socio-economic effects for each phase of the

ID	Theme	Representation	Applicant's Response
		operational phase will be limited. It is far from clear what the benefits to the rural economy will be, and it is possible that the negative impacts on agriculture, tourism and other rural employment may be greater than any job creation from the scheme.	Scheme. These are summarised in Table 14.28. Significant effects identified are Major or Moderate Beneficial on jobs in 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 also assessed. **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: • The absence of tourism assets within the Order Limits • The potential for disruption during construction, but the countervailing potential for additional expenditure by

ID	Theme	Representation	Applicant's Response
			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. **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** provides an assessment on agricultural businesses (with a farming report provided in **ES Volume 3, Appendix 15.2 - Farm Reports [APP-183]**) which concludes the effects are not significant in EIA terms.
Objection to East Pye Solar – Land Parcel 8 (Sites 8a and 8b)			
SPC-025	Opening remarks	Executive Summary This submission provides a detailed objection to the inclusion of Sites 8a and 8b in the East Pye Solar Proposed Development at Shotesham all Saints (PINS Ref EN011014). It draws on the full assessment of environmental, ecological,	The Applicant notes this response and responds to points below.

ID	Theme	Representation	Applicant's Response
		hydrological, heritage, landscape, transport, and agricultural impacts presented in the objection. 1. Introduction The objection is based on robust technical evidence showing that Sites 8a and 8b: • Are environmentally sensitive • Are infrastructure-constrained Pose risks to protected species, habitats, soils, water, and heritage assets The proposals would result in significant and irreversible harm and are not required to meet the development's objectives.	
SPC-026	Opening remarks	3. Summary of Key Issues Ecology & Biodiversity • Sites support barbastelle bats and other protected species • Habitat networks, hedgerows, and field margins provide connectivity • Baseline surveys are incomplete, and proposed mitigation is uncertain	Generally: • The Applicant has assessed the likely significant effects in 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. The management plans are secured via the Requirements contained

ID	Theme	Representation	Applicant's Response
		Water Environment & Hydrology • Increased surface water runoff, flood risk, and impacts on private water supplies • Limited baseline data and potential downstream impacts are uncertain Soils & Agricultural Land • Sites include Grade 1 and 2 agricultural land • Construction would cause compaction, reduce infiltration, and degrade productive soils Heritage & Landscape • Sites affect listed buildings and the setting of heritage assets • Substantial landscape change and long-term visual harm anticipated Public Rights of Way • Loss, severance, or diversion of well-used public rights of way • Recreational connectivity would be harmed Transport & Access	within Schedule 2 to the **Draft DCO [AS-032]**. • The Applicant's position in relation 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. The Applicant has responded to the specific matters raised in SPC-026, in further responses below.

ID	Theme	Representation	Applicant's Response
		• Market Lane is single-track, flood-prone, and unsuitable for HGVs or abnormal loads • Traffic control measures would create delays and operational risks EIA & Assessment Deficiencies • Environmental Statement relies on assumptions, incomplete surveys, and deferred mitigation • Key evidence gaps reduce confidence in predicted effects and mitigation	
SPC-027	Policy	4. Planning Policy Context The allocation of Sites 8a and 8b is inconsistent with: • EN-1 (National Policy Statement for Energy) • EN-3 (NPS for Renewable Energy) • NPPF and relevant Norfolk policies protecting biodiversity, water, soils, and landscape The proposals fail tests of sustainability, deliverability, and soundness.	A response addressing concerns with sites 8A and Site 8B is provided at SPC-013 to 020.

ID	Theme	Representation	Applicant's Response
SPC-028	Alternatives	5. Alternatives • Less harmful sites and alternative access routes exist • These alternatives have not been properly assessed • Sites 8a and 8b are not essential to achieve the development objectives 6. Conclusion • Sites 8a and 8b are unnecessary and disproportionately harmful • Excluding them would reduce environmental, social, and transport impacts without affecting overall project deliverability • Recommendation: Sites 8a and 8b should be removed from the Order Limits	A response addressing concerns with sites 8A and Site 8B is provided at SPC-013 to 020.
SPC-029	Site Selection	Chapter 1. Introduction 1.1. Purpose of this Document This document sets out a detailed, site-specific objection to the inclusion of Sites 8a and 8b (Site 8) within the proposed East Pye Solar development.	These comments are noted. Detailed responses with respect to Shotesham Parish Council's objection to the inclusion of Site 8 within the Scheme are set out herein. The Applicant's position on the overall planning balance, including consideration of

ID	Theme	Representation	Applicant's Response
		The principle of renewable energy development is recognised and supported. However, national policy requires that such development is appropriately sited and that adverse impacts do not outweigh its benefits. The key issue addressed in this document is therefore: • Whether the inclusion of Site 8 is necessary and justified, having regard to its impacts and the availability of less harmful alternatives. This submission demonstrates that: • Site 8 is not required to deliver the scheme • It gives rise to significant, wide-ranging, and in some cases uncertain harm • These impacts have not been fully assessed and cannot be effectively mitigated Accordingly, the evidence supports a clear and proportionate outcome:	Site 8, is set out within the **Planning Statement [APP-210]**.

ID	Theme	Representation	Applicant's Response
		• The removal of Sites 8a and 8b from the Order Limits of the Proposed Development. This objection has been prepared to assist the Examining Authority in its consideration of the application as a Nationally Significant Infrastructure Project (NSIP), and is supported by the evidence set out in the chapters that follow.	
SPC-030	Site Selection	1.2. The Proposed Development This document focuses specifically on Sites 8a and 8b, which are proposed to accommodate solar arrays and associated infrastructure. While the generation of renewable energy is recognised as an important national objective, this does not remove the requirement for development to be appropriately located and designed, and to avoid unacceptable environmental and landscape impacts.	Responses in respect of Site Selection and the inclusion of Sites 8a and 8b in the Scheme are addressed throughout this document including at responses SPC-013 to SPC-020; SPC-030; SPC-032 - SPC-034; SPC-036; SP-54; SPC56 - SPC60; SPC61-SPC64; and SPC163 - SPC164.
SPC-031	EIA Methodology	1.3. Scope of the Objection This objection considers a range of issues relevant to the assessment of the Proposed Development, including:	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

ID	Theme	Representation	Applicant's Response
	Significant effects	• The adequacy of the Environmental Impact Assessment (EIA) • The process of site selection and consideration of alternatives • Environmental effects, including ecology, water, soils, and landscape • Effects on heritage assets and their setting • Impacts on local amenity, including Public Rights of Way and visual effects • Transport and access considerations • Planning policy and the overall planning balance The focus of the assessment is on the specific characteristics and sensitivities of Sites 8a and 8b and their relationship to the surrounding area.	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. The likely significant effects of the Scheme have been assessed within the **ES [APP-036 to APP-195]** and the planning balance considering the likely effects are set out in the **Planning Statement [APP-209]**. 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

ID	Theme	Representation	Applicant's Response
			provided within **ES Volume 3, Appendix 1.2 - Statement of Expertise [APP-112]**.
SPC-032	Site Selection	Chapter 2. Site Context 2.1. Relationship to Shotesham All Saints Sites 8a and 8b extend to approximately 135 acres of agricultural land within the immediate rural setting of Shotesham All Saints. The village is situated within the Tas Valley and is characterised by an undulating agricultural landscape in which built form is closely integrated with the surrounding countryside. This relationship is explicitly recognised in the Shotesham Conservation Area Character Appraisal (2018), which identifies the surrounding farmland as a key component of the village's significance. Sites 8a and 8b lie within this landscape context and contribute directly to the rural backdrop of the settlement. The settlement pattern is dispersed, with a gradual transition between built form and countryside. As a result:	The Applicant notes these comments, and the points raised in SPC-032 regarding cultural heritage have been addressed in detail in SPC-109 - SPC-118. The Applicants 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 it has informed the iterative design process with the aim to reduce adverse effects. At Site 8B solar development has been excluded on rising landform to the north and west to reduce visibility of the Scheme from Shotesham to the north. As identified on Figure 7.5.4 Zone of Theoretical Visibility for Site 8, theoretical visibility from Shotesham and Shotesham All Saints is restricted by a combination of the Scheme design and parameters and existing landform and existing vegetation. In addition, as identified on the **Green Infrastructure Strategy [AS-005]** landscape measures have been proposed to reinforce existing tree features on existing filed boundaries, which seeks to retain and

ID	Theme	Representation	Applicant's Response
		• The distinction between village and landscape is not clearly defined • The surrounding land forms part of the village's functional and perceptual extent The sites are also experienced in relation to heritage assets within the village, including a number of listed buildings (including Upgate Farm, which looks directly over site 8b), whose setting relies on the surrounding open countryside. The Conservation Area Appraisal identifies the importance of views into and out of the village, which enable appreciation of heritage assets within their wider landscape context. Sites 8a and 8b form part of this visual envelope. Development within these sites would therefore be perceived as encroachment into the village's immediate setting, rather than development of visually contained or detached land. In addition, the agricultural land reflects historic field patterns that contribute to the area's time-depth and rural identity.	enhance existing vegetation and respond to the prevailing character as far as practicable and screen the remaining part of the Site 8B which is proposed for solar development.

ID	Theme	Representation	Applicant's Response
		The industrialisation of this land would erode this coherence and weaken the functional and perceptual relationship between the village and its surroundings. Sites 8a and 8b should therefore be understood as forming an integral component of the setting of Shotesham All Saints.	
SPC-033	Site Selection	2.2. Site Characteristics and Sensitivity Sites 8a and 8b exhibit a combination of physical and environmental characteristics that give rise to a high level of sensitivity. The sites: • Slope toward a tributary of the River Tas • Are visually prominent within the wider landscape • Are readily experienced from Public Rights of Way • Lie adjacent to ancient woodland • Are located close to residential receptors and heritage assets	The Applicant notes these comments regarding the Site characteristics and high sensitivity. Detail of the landscape baseline is presented in **ES Volume 3, Appendix 7.2 – Landscape Baseline [APP-119]** which provides descriptions of the baseline characteristics and features of all relevant district landscape character areas and of individual Sites. These have therefore been considered in the assessment of effects, and the assessment of likely significant effects with respect to the topics identified are presented across **ES Volume 1, Chapters 6 to 18 [APP-053 to APP-065]**. Furthermore, the characteristics and sensitivity have informed the design response, with environmental considerations embedded into the design principles and design evolution of siting infrastructure. The design evolution of the Scheme in respect of

ID	Theme	Representation	Applicant's Response
		These overlapping sensitivities create a concentration of constraints within a relatively limited area. Taken together, the site demonstrates elevated sensitivity in relation to: • Landscape character • Visual amenity • Ecology • Hydrology • The setting of heritage assets	landscape and visual context is set out in the **Design Approach Document [APP-212]**. This includes consideration of topography with elevated and rising landforms avoided from development, and proximity to the PRoW network and ancient woodland. At Site 8B solar development has been excluded on rising landform to the north and west with landscape measures proposed to reinforce existing tree features (as defined on the **Green Infrastructure Strategy [AS-005])** and screen the remaining part of the Site which is proposed for solar development. At Site 8A a minimum 30m buffer will be applied to all ancient woodland and land adjacent to Ringers Grove has been excluded from development. The solar development is also offset by a minimum of 15m from the PRoW network to reduce effects. Collectively the approach and measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects, and environmental considerations are embedded into the design principles and design evolution of siting infrastructure.

ID	Theme	Representation	Applicant's Response
SPC-034	Site Selection Scheme Description	2.3. Description of the Proposed Development (Site 8) The layout includes: • Solar panel arrays across multiple fields • Associated infrastructure and cabling • Connections to adjoining parts of the scheme The layout is indicative only and subject to change through ongoing design development. Indicative mitigation proposals include: • Limited hedgerow planting • Fragmented areas of additional vegetation However, there is no evidence of a comprehensive or coherent strategy for: • Landscape integration • Habitat connectivity • Long-term environmental management Access arrangements also remain uncertain, with only indicative access	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
		points identified. Proposals have been made which currently will involve significant and uncertain figures for increases in traffic on narrow lanes, with poor visibility and few passing places. In the absence of detailed and fixed design information, confirmed details for the movement of site workers, etc which have been proposed to get to site independently, consideration of the number of trucks containing water for washing the panels and their route for accessing Site 8, the likely environmental effects cannot be reliably assessed.	**ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and **ES Volume 3, Transport Assessment [APP-174 - APP-177]** presents an assessment of the Scheme on traffic and access, with the proposed construction routes and access points shown in the **Outline CTMP [APP-201]**. 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. Detailed CTMP, OTMP and PRoWPPMP 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]**. AIL movements 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 AIL movements will be undertaken using strict traffic management and notification of these

ID	Theme	Representation	Applicant's Response
			types of movements will be communicated in advance. 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. As part of the management of AIL, the selected haulier must notify the police, highway authorities and bridge owners when planning to transport AIL. It is likely that AIL deliveries will require temporary road closures or diversions on the day of the delivery and may require police escorts to maintain the safety of members of the public. 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

ID	Theme	Representation	Applicant's Response
			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]**.
SPC-035	Policy Landscape and Visual	2.4. Planning and Landscape Context Planning and Landscape Context Sites 8a and 8b lie within a predominantly rural landscape characterised by agricultural land, dispersed settlement, and strong visual connectivity across the Tas Valley. The sites are not allocated for development and form part of the countryside setting of Shotesham All Saints. Relevant planning policy emphasises: • Protection of rural character	A response addressing concerns with sites 8A and Site 8B is provided at SPC-020. The Applicant notes the landscape character of Site 8. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043**] which takes into account matters raised in this response. 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]**.

ID	Theme	Representation	Applicant's Response
		• Conservation of landscape quality • Safeguarding the setting of settlements and heritage assets Given this context, particular weight must be given to the contribution of the sites to: • The setting of the Conservation Area • The maintenance of key views • The openness of the surrounding landscape	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]**. In terms of the planning balance, and as set out in the **Planning Statement [APP-210]**, with the critical and urgent need for the Scheme enshrined in national policy, it is considered that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.
SPC-036	Site Selection EIA Methodology	2.5. Summary of Sensitivity Sites 8a and 8b are subject to a combination of environmental constraints and sensitivities, including: • Ecological sensitivity: Presence of protected species and habitat networks	The Applicant has assessed the likely significant effects in the **ES [APP-042 to APP-056]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032]**. The planning balance considering the positive, neutral and negative impacts are set

ID	Theme	Representation	Applicant's Response
		• Hydrological sensitivity: Direct connectivity to the River Tas catchment • Soil sensitivity: Clay-rich soils vulnerable to compaction • Landscape sensitivity: High-value rural landscape with limited capacity for change • Heritage sensitivity: Contribution to the setting of the Conservation Area • Recreational sensitivity: Presence of Public Rights of Way and valued user experience • Access constraints: Limited and unsuitable rural road network Taken together, these factors demonstrate that Site 8 is a highly constrained and sensitive location, where development would give rise to significant and interrelated environmental effects.	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. These environmental constraints have been assessed in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044], Chapter 9 – Water Environment [APP-045], Chapter 16 – Soils and Agricultural Land [APP-051]**, **Chapter 7 – Landscape and Visual [APP-043]**, **Chapter 10 – Cultural Heritage, and Chapter 11 – Transport and Access [APP-047]**. Sub-Sites 8A and 8B have been subject to an iterative, environmentally-led design process which has responded to the identified environmental sensitivities through both avoidance (removal of Solar PV Arrays from Flood Zones 2 and 3, from land adjacent to Ringers Grove Ancient Woodland, from the northern part of Sub-Site 8B and from the western part of Sub-Site 8B) and mitigation (secured through the outline management plans, the **Design Principles, Parameters and Commitments [APP-213]** and

ID	Theme	Representation	Applicant's Response
			Requirements in Schedule 2 of the **Draft DCO [AS-032]**.
SPC-037	EIA Methodology	Chapter 3: Environmental Impact Assessment Deficiencies 3.1. Chapter Summary This chapter identifies fundamental and systemic deficiencies in the Environmental Impact Assessment (EIA) accompanying the Proposed Development, with specific reference to Sites 8a and 8b. It demonstrates that: • The assessment is inconsistent, high-level, and lacks methodological rigour • Baseline data is incomplete across multiple disciplines • The Environmental Statement relies heavily on assumed mitigation and post-consent controls • The scheme is assessed using a flexible design envelope, introducing significant uncertainty	The Environmental Statement provides a full environmental assessment in accordance with relevant legislation and guidance. 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 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]**. 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]**.

ID	Theme	Representation	Applicant's Response
		• Impacts are systematically underestimated through methodological assumptions • Cumulative effects are not robustly assessed • Key environmental information is deferred to post-consent stages These are not isolated issues. They represent a consistent pattern across the Environmental Statement, which materially reduces confidence in its findings. As a result, the Environmental Statement does not provide a robust or reliable basis for decision-making, and its conclusions should be afforded limited weight.	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]**. 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 impact will no longer occur). The Scheme has Work Nos as described in Schedule 1 of the **Draft DCO [AS-032]** and does not have a detailed design at this stage.

ID	Theme	Representation	Applicant's Response
			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 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. As detailed in **ES Volume 1, Chapter 2 – EIA Methodology [APP-038],** 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 Rochdale Envelope approach ensures a robust assessment of the

ID	Theme	Representation	Applicant's Response
			likely significant environmental effects of the Scheme. All technical chapters (**ES Volume 1, Chapters 6 [APP-042]** to **18 [APP-054]**) determine and assess the maximum parameters where flexibility needs to be retained as under the Rochdale Envelope approach. 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 approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The cumulative effects assessment of the ES has been undertaken in line with the EIA Regulations and the PINS Advice on Cumulative Assessment, and is considered to a robust yet proportionate approach to assessing the cumulative impacts of 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 (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate

ID	Theme	Representation	Applicant's Response
			with other projects and relevant stakeholders to understand and, where practicable, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination.
SPC-038	EIA Methodology	3.2. Policy Context National policy requires that environmental information is sufficient, robust, and available at the point of decision-making. In particular: • NPS EN-1 §§4.2–4.3 require adequate information to assess likely significant effects and clearly defined mitigation • NPS EN-1 §4.5 requires robust assessment of cumulative effects • NPS EN-3 requires site-specific assessment and proper consideration of environmental constraints Where information is uncertain, incomplete, or deferred, decision-makers	The **Planning Statement [APP-209]** and **Policy Compliance Document [APP-210]** set out how the Scheme complies with the relevant NPS. As set out within SPC-037, an assessment of the likely significant effects of the Scheme, including cumulative effects, is set out within the **ES [APP-036 to APP-195].** 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]**.

ID	Theme	Representation	Applicant's Response
		cannot be satisfied that impacts are acceptable.	
SPC-039	EIA Methodology	3.3. EIA Failure Summary The deficiencies identified are systemic and cross-cutting, affecting multiple topics and stages of the assessment. They are summarised in Table 5.1 below: Assessment Methodology • Identified issue: Inconsistent and, in places, high-level assessment; not all topics assessed using full EIA Methodology. • Implications: Reduces robustness across disciplines. • Planning Consequence: conclusions cannot be relied upon as a consistent evidence base. Baseline Data Gaps • Identified issue: Limited or incomplete surveys and investigations (e.g. ground conditions, ecology, archaeology).	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 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. **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 temporal scopes, determining baseline conditions, mitigation, effect significance criteria, cumulative and in combination effects, and consideration of alternatives. Each of the topic chapters **[APP-042 to APP-056]** provide an explanation of methods used in undertaking the technical study with

ID	Theme	Representation	Applicant's Response
		• Implication for Assessment: Environmental receptors and constraints not fully understood. • Planning consequence: Likely significant effects cannot be accurately identified or assessed. Reliance on Mitigation • Identified issue: Heavy reliance on outline plans, embedded mitigation, and measures not secured in detail. • Implication for assessment: Effectiveness of mitigation is uncertain and untested at this stage. • Planning consequence: Acceptability of impacts is not demonstrated at the point of decision. Design Uncertainty • Identified issue: Flexible 'Rochdale Envelope' approach allowing variation in layout, setting, and infrastructure	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. 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 **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 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

ID	Theme	Representation	Applicant's Response
		• Implication for assessment: Final scheme may differ materially from that assessed. • Planning consequence: Potential for impacts greater than those reported in the ES. Deferral to Post-Consent • Identified issue: Key elements (design detail, mitigation, investigations) deferred to future approvals • Implication for assessment: Environmental effects not fully understood at examination stage • Planning consequence: Decision-making is based on incomplete information, contrary to EIA principles. Underestimation of Effects • Identified issue: Use of generic thresholds, modelling assumptions, averaging, and desk-based assessments.	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 Rochdale Envelope approach 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]**) determine and assess the maximum parameters where flexibility needs to be retained as under the Rochdale Envelope approach. 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 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

ID	Theme	Representation	Applicant's Response
		• Implication for assessment: Does not reflect site-specific sensitivity or real-world receptor experience • Planning consequence: Impacts are likely to be understated in the ES. Cumulative Effects • Identified issue: No robust standalone cumulative assessment; reliance on individual topic assumptions. • Implication for assessment: Combined and interacting effects not properly assessed. • Planning consequence: Overall environmental impact of the scheme is underestimated.	**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 impact will no longer occur). The Applicant is aware of other projects in the region. The technical chapters of **ES Volume 1 [APP-042** to **054]** presents an assessment of the cumulative effects of multiple existing and/or approved developments generating cumulative effects which together have an increased effect on the receptors presented in the ES. The cumulative effects assessment of the ES has been undertaken in line with the EIA Regulations and the PINS Advice on Cumulative Assessment, and is considered to

ID	Theme	Representation	Applicant's Response
			a robust yet proportionate approach to assessing the cumulative impacts of 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.
SPC-040	EIA Methodology	These issues are particularly significant for Sites 8a and 8b, where environmental sensitivity and receptor Systematic Deficiencies in the EIA The Environmental Impact Assessment demonstrates multiple, systematic shortcomings: incomplete baseline data for ecology, hydrology, and residential amenity; reliance on undefined mitigation measures; lack of worst-case scenario assessment; and inconsistent conclusions. These deficiencies collectively fail to meet the requirements of the Infrastructure Planning (EIA) Regulations 2017 and National Policy Statement EN-1, undermining confidence	The Applicant refers to its response to SPC-039.

ID	Theme	Representation	Applicant's Response
		that likely significant effects have been properly identified or assessed.	
SPC-041	Alternatives	Proportional and Reasonable Alternative Exists Evidence from the evolution of the East Pye Solar scheme shows that alternative configurations have been implemented successfully elsewhere. Given the minimal contribution of Sites 8a and 8b to overall generation, their removal would not materially affect scheme delivery, but would significantly reduce environmental, heritage, and amenity harm. A reasonable and proportionate outcome would therefore be the exclusion of Sites 8a and 8b from the Order Limits.	Site 8 has been subject to significant constraint-led refinement through the iterative design process, as set out within the **Design Approach Document [APP-212]**. These design changes demonstrate that the constraints affecting Site 8 have been addressed through a rigorous, evidence-led application of the mitigation hierarchy. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme 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. The **Site Selection Assessment [APP-215]** concludes that there are no locations identified within the search area that are more suitable and available than the proposed

ID	Theme	Representation	Applicant's Response
			location for the Scheme, and, in accordance with paragraph 4.3.24 of NPS EN-1, 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.
SPC-042	RVAA	3.4. Residential Amenity Assessment Gaps The PEIR does not provide an adequate assessment of residential amenity. Key deficiencies include: • No Residential Visual Amenity Assessment (RVAA) • No assessment of private views • No analysis of overbearing or oppressive effects • No cumulative assessment of combined impacts	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]**. An assessment of overbearing or oppressive effects has not been undertaken, as no residential properties were identified as meeting the RVAA assessment thresholds. 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

ID	Theme	Representation	Applicant's Response
		A property-specific visual analysis would be required to assess the extent of overbearing effects. Properties such as Market Lane Farm and Dawson's farm are directly adjacent to Site 8, and due to the undulating nature of the valley, other homes nearby are significantly impacted visually.	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.
SPC-043	RVAA	Residential Amenity – Fundamental Deficiencies The Proposed Development is in extremely close proximity to Market Lane Farm and Dawson's Farm (less than 15 m from the site boundary), creating a high risk of significant adverse effects on residential amenity. The Applicant's LVIA explicitly excludes assessment of private views, relying solely on public viewpoints, which is inadequate at such distances. Public viewpoints cannot capture the static, prolonged, and highly sensitive nature of views from within homes and gardens. Significant and "substantial" adverse effects have already been identified at Market Lane Farm from public viewpoints, indicating that actual impacts	The Applicant refers to its response toSPC-042 which addresses the query on RVAA. The Applicant has responded to the comment on visual amenity of resident at Market Lane Farm raised at PEIR stage, and solar development has been removed from parts of Sub-Site 8B in response. The design evolution of the Scheme is summarised in the **Design Approach Document [APP-212]**. Although Market Lane Farm is located close to the Site Boundary, it is not 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

ID	Theme	Representation	Applicant's Response
		on residents are likely equal or greater. No Residential Visual Amenity Assessment (RVAA) or equivalent property-specific analysis has been undertaken to assess overbearing, oppressive, or dominating effects. This represents a clear failure to comply with EIA requirements to assess impacts on living conditions and human health. Proposed mitigation through hedgerows and planting is insufficient. At less than 15 m, vegetation would take years to establish and remains seasonally and conditionally unreliable. Even mature planting cannot prevent the development from appearing overbearing. The absence of a detailed planting strategy, Year 15 assessment, or management plan further undermines mitigation effectiveness. Overall, the assessment is incomplete, methodology is not fit for purpose, and proposed mitigation is ineffective. The Examining Authority is requested to place substantial weight on these deficiencies and require a full RVAA and reassessment of residential amenity impacts. In the absence of such	assessment of properties within 100m. Two properties out of 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. The Applicant considers that the embedded mitigation measures, including the removal of some development and the proposed woodland planting as set out in the **Green Infrastructure Strategy [AS-005]**, provide sufficient mitigation at this location. This is demonstrated by View Location VL4/LP8. VL4/LP8 was selected to represent views from Market Lane. A major adverse significant effect was identified during construction and Operational Year 1; however, this reduces to a negligible adverse effect by Operational Year 15. The Applicant does not agree that a substantial adverse effect has been identified for Market Lane. The Applicant also disagrees that the effects experienced by

ID	Theme	Representation	Applicant's Response
		evidence, the EIA does not demonstrate that unacceptable harm to living conditions would be avoided.	residents are likely to be greater than those represented by the selected viewpoint. Dawson's Farm is located within the 100m study area of the RVAA, and an initial assessment has been undertaken. It was determined that no further assessment is required. The Applicant considers that the Landscape and Visual Assessment presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and **ES Volume 3, Appendix 7.8 – Residential Visual Amenity Assessment [APP-148]** has been undertaken in accordance with the appropriate guidelines, has informed the iterative design process and is robust and appropriate for the assessment of the Scheme.
SPC-044	EIA Methodology	3.5. Inadequate Baseline Data The Environmental Statement is affected by significant limitations in baseline information across multiple topics. Ground conditions • Limited intrusive investigation	The **ES [APP-036** to **APP-195]** presents the baseline data for the Scheme in accordance with industry best practice. 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**

ID	Theme	Representation	Applicant's Response
		• Potential contamination risks unresolved • Further investigation deferred to post-consent Ecology • Surveys described as "light touch" • Limited assessment of behavioural patterns and habitat use • Reliance on assumptions regarding species presence Archaeology • Partial survey coverage • Limited trenching • Potential for unidentified remains In each case, the absence of robust baseline data means that: • The magnitude of impact cannot be reliably assessed • The effectiveness of mitigation cannot be demonstrated This introduces material uncertainty at the point of decision-making.	**3, Appendix 1.2 - Statement of Expertise [APP-112]**. The Applicant refers to: • Its response to SPC-099 regarding ground conditions and ground investigations; • Its response to SP-073 regarding ecological survey and assessment • Its response to SPC-109 to SPC-118 regarding archaeology.

ID	Theme	Representation	Applicant's Response
SPC-045	EIA Methodology	3.6. Over-Reliance on Mitigation The Environmental Statement relies extensively on: • Outline management plans (including CEMP, OEMP, Soil Management Plan) • Embedded mitigation • Future approvals and detailed design These measures: • Lack detailed, secured commitments • Are subject to future agreement • Depend on implementation by unknown parties This approach assumes that impacts can be controlled post-consent, rather than demonstrating that impacts are acceptable at the point of determination.	Regulation 14, Paragraph (2)(c) of the EIA Regulations requires the ES to provide 'a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment'. **ES Volume 1, Chapter 2 - EIA Methodology [APP-038]** sets out the mitigation hierarchy approach adopted in the ES. As detailed within the **Planning Statement [APP-209]**, the mitigation hierarchy has been applied, in satisfaction of NPS EN-1. The proposed management and mitigation measures are set out in the **ES [APP-036 to APP-195]** and are secured through various outline 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]**.

ID	Theme	Representation	Applicant's Response
			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]**. 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 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

ID	Theme	Representation	Applicant's Response
			implemented. These management plans are secured via the Requirements contained within Schedule 2 of the **Draft DCO [AS-032]**.
SPC-046	EIA Methodology	3.7. Flexible Design and Lack of Certainty The Proposed Development is assessed using a flexible design envelope, rather than a defined scheme. This results in: • Uncertainty in layout and infrastructure placement • Potential for impacts greater than those assessed • Reduced reliability of assessment conclusions For Sites 8a and 8b, where sensitivity is high and receptor exposure is significant, this lack of certainty undermines confidence in: • Landscape and visual assessments • Heritage impact assessment • Amenity-related conclusions	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

ID	Theme	Representation	Applicant's Response
			assess likely reasonable worst-case scenario for the likely significant environmental effects of the Scheme to be considered.
SPC-047	EIA Methodology	3.8. Inconsistent and High-Level Assessment Approach The Environmental Statement confirms that several topics have been assessed at a high level, without full application of EIA methodology. This results in: • Inconsistent assessment across disciplines • Reduced evidential robustness • Limited comparability between topics In several cases, potential effects are identified but dismissed on the basis of assumed mitigation, rather than being properly assessed.	The Applicant refers to its response to SPC-045.
SPC-048	EIA Methodology	3.9. Underestimation of Effects Across multiple topics, impacts are minimised through: • Use of generic thresholds • Averaging of data	The Environmental Statement provides a full environmental assessment in accordance with relevant legislation and guidance. The **ES [APP-036 to APP-195]** and environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes.

ID	Theme	Representation	Applicant's Response
		Assumed screening effects Examples include: • Glint and glare assessed on a desk-based basis without field validation • Transport excluding operational effects and not reflecting rural sensitivity • Noise relying on statistical averages with limited consideration of tranquillity • Air quality applying generic thresholds This approach does not adequately reflect site-specific sensitivity or actual receptor experience, and is likely to understate the true scale of effects.	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 11 – Transport and Access [APP-047]** does not include an assessment of the impacts during the operation and maintenance phase, which are scoped out of this chapter on the basis that the effects are unlikely to be significant when compared to the construction and decommissioning phases. This was agreed with the Planning Inspectorate (PINS) through the EIA scoping process, see **ES Volume 3, Appendix 2.2 - East Pye EIA Scoping Opinion [APP-0114]**. Mitigation and control measures for dust and vehicle emissions are provided in the **Outline CEMP [APP-196]** and **Outline OEMP [APP-197]**. In accordance with Requirements 13 and 14 of the **Draft DCO [AS-032]**, detailed CEMP and OEMP will be submitted to and approved by the relevant planning authority. A site survey for the **ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [AS-025 to AS-029]** was not considered necessary to inform the impact further than the already-

ID	Theme	Representation	Applicant's Response
			available resources. A solar reflection is calculated based on the panel's configuration (height, tilt angle and azimuth angle) relative to the sun's position and the location of a receptor, and therefore independent of the site-specific conditions. When determining the impact, an assessment is made from the available resources such as digital terrain models, aerial imagery, and streetview imagery (such as Google Earth) to determine the impact. Resources such as these are regularly kept up-to-date and allow for an assessment at various times of the year, providing a more robust assessment than a site survey which would be at a specific time of the year. A site survey would therefore not significantly differ from the desk-based assessment to determine the potential glint and glare effects, and this methodology has been adopted for previous NSIP and DCO schemes. The Noise and Vibration assessment is presented in **ES Volume 1, Noise and Vibration [APP-048]**. The assessment of operational noise is based on measured background sound levels at locations representative of receptors. The levels

ID	Theme	Representation	Applicant's Response
			derived are not statistical averages. The derivation of background sound levels is derived based on guidance provided within BS 4142:2014+A1:2019. Average ambient sound levels are presented to determine the ABC threshold category to support the construction noise assessment, which is based on guidance provided within BS 5228-1:2009+A1:2014. **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 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

ID	Theme	Representation	Applicant's Response
			be insignificant as the percentage change in pollutant concentrations would be negligible.
SPC-049	EIA Methodology	3.10. Inadequate Assessment of Cumulative Effects The Environmental Statement concludes that cumulative effects are not significant; however: • There is no robust standalone cumulative assessment • Conclusions rely on individual topic assessments Interactions between effects are not fully examined This risks underestimating: • Combined landscape and visual effects • Cumulative pressure on environmental receptors	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. **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. Presenting cumulative effects relevant to each topic

ID	Theme	Representation	Applicant's Response
			within the respective topic chapters follows standard EIA best practice. 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.
SPC-050	EIA Methodology	3.11. Deferral of Key Information Key elements of the assessment are deferred to post-consent stages, including: • Ground investigations • Drainage design • Soil management • Ecological mitigation As a result, the Examining Authority is not in a position to: • Fully understand likely impacts	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 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]**. Paragraph 2(4) of Schedule 15 to the **Draft DCO [AS-032]**

ID	Theme	Representation	Applicant's Response
		• Assess the effectiveness of mitigation • Reach a properly informed conclusion	requires the Applicant to confirm when applying for approval of a secured plan 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 the effectiveness of the mitigation measures identified in the Environmental Statement will be secured by ensuring that the final design of the Scheme falls within the framework of the conclusions of that Environmental Statement. Breach of a DCO or failure to comply with Requirements can result in enforcement action. Management plans are secured via the Requirements contained within Schedule 2 of the **Draft DCO [AS-032]**. The Applicant refers to its response to: • SPC-099 regarding ground investigations; • SPC-083 regarding drainage design; • SPC-106 regarding soil management; and • SPC-066 regarding ecological mitigation.

ID	Theme	Representation	Applicant's Response
SPC-051	EIA Methodology	3.12. Site-Specific Implications for Sites 8a and 8b These deficiencies are particularly significant for Sites 8a and 8b due to: • Open and exposed landscape character • High sensitivity of visual and residential receptors • Agricultural land quality Hydrological and ecological connectivity In this context: • High-level assessment is insufficient • Reliance on mitigation is inappropriate • Design uncertainty materially affects conclusions	The Applicant refers to its response to SPC-039.
SPC-052	EIA Methodology	3.13. Summary of Effects • Uncertainty in assessment of likely significant effects • Incomplete understanding of baseline conditions • Reliance on mitigation that is not secured or defined	The Applicant refers to its response to SPC-039.

ID	Theme	Representation	Applicant's Response
		• Underestimation of site-specific impacts • Failure to assess cumulative effects robustly • Deferral of key information to post-consent stages	
SPC-053	EIA Methodology	3.14. Policy Conflict The deficiencies identified result in conflict with: • NPS EN-1 §§4.2–4.5 (adequacy of evidence, mitigation, cumulative effects) • NPS EN-3 (site-specific assessment and environmental constraints) • The Environmental Statement does not provide the level of certainty required for lawful and robust decision-making.	The **Planning Statement [APP-209]** and **Policy Compliance Document [APP-210]** set out how the Scheme complies with relevant national and local planning policies. 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.

ID	Theme	Representation	Applicant's Response
			The Applicant's position is that the **ES [APP-036 to APP-195]** sets out a proportionate assessment in accordance with industry best practice and PINS guidance.
SPC-054	Site Selection and Alternatives	3.15. Relationship with Alternatives and Design Evolution The deficiencies identified in this chapter have a direct bearing on the assessment of alternatives and design evolution presented in Chapter 4. In particular: • The reliance on a flexible design envelope means that the scheme assessed is not fixed, limiting the ability to meaningfully compare alternatives • The use of high-level and inconsistent assessment methodology reduces confidence that environmental constraints have been properly identified and applied to site selection • The absence of robust baseline data means that key constraints—particularly ecological, hydrological, and heritage sensitivities—may not have been fully understood at the point alternatives were considered	The **ES [APP-036 to APP-195]** adopts the Rochdale Envelope approach to maintain flexibility in the design and layout of the Scheme in the DCO Application. The Rochdale Envelope ensures a robust reasonable worst-case assessment of the likely significant environmental effects of the Scheme. The maximum parameters of the Scheme are shown spatially on the **Works Plans [AS-002 – AS-003]** and are described within the **Design Principles, Parameters, and Commitments [APP-213]** document. Paragraph 4.3.9 of NPS EN-1 states that '*This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective*'. 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

ID	Theme	Representation	Applicant's Response
		• The reliance on assumed mitigation suggests that constraints have been managed rather than avoided through site selection and design As a result, the process of alternatives assessment appears reactive rather than plan-led, with environmental constraints addressed through mitigation and design adjustments rather than forming the basis of site selection. This undermines the conclusions of Chapter 4 and further demonstrates that: • Sites 8a and 8b have not been shown to be the least harmful or most appropriate locations • Less harmful alternatives may exist but have not been robustly assessed Accordingly, the deficiencies in the Environmental Statement extend beyond technical assessment and undermine the credibility of the alternatives and design evolution process as a whole.	proportionate manner. Furthermore, only the alternatives that meet the objectives of the proposed development should be considered. Paragraph 4.3.23 of EN-1 states that '*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*.' A proportionate approach has been taken to the consideration of potential alternative sites which could suitably accommodate the Scheme, including a consideration of non-BMV land against the site selection criteria established in relation to NPS EN-1. Overall, the Applicant considers that the ES, the **Site Selection Assessment [APP-215]** and the **Design Approach Document [APP-212]** together demonstrate that the assessment of alternatives and design evolution has been undertaken in accordance with the requirements of the Infrastructure Planning (EIA) Regulations 2017 and the policy expectations of NPS EN-1 and NPS

ID	Theme	Representation	Applicant's Response
			EN-3, and that Sub-Sites 8A and 8B have been subject to an iterative, environmentally-led design process which has responded to the identified environmental sensitivities through both avoidance (removal of Solar PV Arrays from Flood Zones 2 and 3, from land adjacent to Ringers Grove Ancient Woodland, from the northern part of Sub-Site 8B and from the western part of Sub-Site 8B) and mitigation (secured through the outline management plans, the **Design Principles, Parameters and Commitments [APP-213]** and Requirements in Schedule 2 of the **Draft DCO [AS-032]**. In relation to the site selection methodology, the Applicant's refers to its response to SPC-013 to SPC-017. As set out within the **Site Selection Assessment [APP-215],** the Sites were selected from a consideration of environmental, planning, and land constraints through desktop assessment, avoiding environmental designations and directing site selection to the areas with the lowest likelihood of BMV within 20km of the Point of Connection. The initially selected Sites were

ID	Theme	Representation	Applicant's Response
			judged to be appropriate in avoiding significant environmental, planning, and land constraints and being able to jointly accommodate a 500MW solar Scheme. As set out within the **Design Approach Document [APP-212]**, the design evolution of the Scheme has been environmentally-led, responding to constraints as they became better understood through the Environmental Impact Assessment (EIA) process from surveys and assessment work.
SPC-055	EIA Methodology	3.16. Conclusion The Environmental Impact Assessment is affected by systemic and cross-cutting deficiencies, including: • Inadequate baseline data • Reliance on assumed and unsecured mitigation • Flexible design and lack of certainty • Inconsistent and high-level methodology • Systematic underestimation of impacts	The Applicant refers to its response to SPC-039.

ID	Theme	Representation	Applicant's Response
		• Failure to robustly assess cumulative effects • Deferral of key environmental information Taken together, these issues demonstrate that the Environmental Statement does not present a robust, transparent, or complete assessment of likely significant effects. For Sites 8a and 8b—where landscape sensitivity, receptor exposure, and environmental constraints are particularly high—these deficiencies are critical. They mean that: • The true scale of environmental effects remains uncertain • The effectiveness of mitigation cannot be relied upon • The assessment does not provide a sound basis for decision-making Accordingly, the Environmental Statement should be afforded limited weight in the planning balance. These deficiencies materially weaken the Applicant's case and weigh significantly	

ID	Theme	Representation	Applicant's Response
		against the granting of development consent for Sites 8a and 8b.	
SPC-056	Site Selection and Alternatives	Chapter 4: Alternatives and Site Selection 4.1. Chapter Summary This chapter demonstrates that reasonable alternatives have not been properly or consistently considered in the evolution of the Proposed Development. It shows that: • The scheme has evolved elsewhere in response to environmental constraints • Site 8 has not been subject to the same level of constraint-led design refinement • Significant environmental and technical constraints affecting Site 8 remain unresolved • The alternatives assessment lacks transparency and comparative analysis • Site 8 makes only a limited contribution to the scheme but gives rise to disproportionate harm	The Applicant has addressed concerns with sites 8A and Site 8B in its response to SPC-020. Additional responses to these matters are provided to SPC-057 to SPC-065.

ID	Theme	Representation	Applicant's Response
		Accordingly, the inclusion of Sites 8a and 8b is not justified, and their removal represents a reasonable and less harmful alternative. 4.2. Policy Context National policy and EIA guidance require that reasonable alternatives are properly considered. In particular: • The EIA Regulations 2017 require a description of reasonable alternatives and the reasons for the chosen option • NPS EN-1 requires good design and avoidance of environmental harm • NPS EN-3 requires proper consideration of environmental constraints in site selection • The sequential approach to flood risk requires development to be directed to areas of lowest risk Where alternatives are not properly assessed, it cannot be concluded that the chosen site represents the most appropriate option.	

<table>
<tr><th>ID</th><th>Theme</th><th>Representation</th><th>Applicant's Response</th></tr>
<tr><td>SPC-057</td><td>Site Selection and Alternatives</td><td>4.3. Evidence of Design Evolution Across the Scheme

Consultation material demonstrates that the scheme has undergone iterative design changes, including:

• Removal or reduction of sites
• Refinement of site boundaries
• Modification in response to environmental and technical constraints

<table><tr><th>Site group</th><th>Type of change</th><th>Scale</th></tr><tr><td>Figure 6.1: Comparative plan showing evolution of sites across the Scheme</td><td>Infrastructure + substation fixing</td><td>Major</td></tr><tr><td>Site 3</td><td>Partial removal (3A)</td><td>Major</td></tr></table></td><td>The Applicant notes this comment.

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 likely significant effects of the Scheme have been assessed within the ES [APP-036 to APP-195].</td></tr>
</table>

ID	Theme	Representation	Applicant's Response
		<table><tr><td>Site 4-6</td><td>Buffer and minor layout refinement</td><td>Moderate</td></tr><tr><td>Site 7</td><td>Large internal redesign</td><td>Moderate</td></tr><tr><td>Site 8</td><td>Edge reductions and repositioning</td><td>Moderate</td></tr><tr><td>Site 9</td><td>Minor refinement only</td><td>low</td></tr><tr><td>Site 10</td><td>Internal adjustments only</td><td>Low</td></tr></table> This indicates that alternative configurations are feasible and have been implemented.	
SPC-058	Site Selection and Alternatives	4.4. Site-Specific Evolution at Site 8 Sites 8a and 8b have undergone limited design changes, including: • Removal of fields within Site 8b	The Applicant refers to its response to SPC-041 and SPC-057. The likely significant effects of the Scheme have been assessed within the **ES [APP-036** to **APP-195]** and the planning balance

ID	Theme	Representation	Applicant's Response
		• Reduction of development near woodland in Site 8a • Exclusion of panels from flood-prone areas These changes demonstrate partial recognition of constraints. However: • Amendments are limited and reactive • Fundamental constraints remain unresolved • The level of refinement is not comparable to other parts of the scheme Key unresolved issues include: • Flood risk and hydrological sensitivity • Pollution risk to the River Tas • Impacts on private water supplies • Effects on protected species • Proximity to designated sites and ancient woodland • Landscape and heritage impacts • Impacts on public rights of way and rural character	considering the likely effects are set out in the **Planning Statement [APP-210]**. The Applicant refers to the following responses: • SPC-083 regarding flood risk and hydrological sensitivity; • SPC-088 regarding impacts on private water supplies; • SPC-066 regarding protected species; • SPC-066, SPC-067 and SPC-072 regarding impacts on designated sites and ancient woodland; • SPC-109 to SPC-106 regarding landscape and heritage impacts; • SPC-127 regarding public rights of way and rural character; and • SPC-135 to SPC-149 regarding infrastructure and access constraints.

ID	Theme	Representation	Applicant's Response
		• Infrastructure and access constraints There is limited evidence that consultation feedback has resulted in substantive redesign.	
SPC-059	Site Selection Water Environment	4.5. Site Constraints Sites 8a and 8b are subject to multiple overlapping constraints. The sites: • Lie adjacent to a watercourse and associated floodplain corridor • Form part of a natural surface water flow pathway • Are hydrologically connected to the River Tas catchment This map shows that part of Site 8a lies directly in Flood Zone 2 and 3. East Pye Solar have removed panels from that part of Site 8a. However, this seems quite purposeless, as it will do little to reduce any increase in the rate of flow of water from Site 8a and b, caused by the panels and water runoff patterns. In addition: • Cable routes would require crossings of the watercourse	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 and a sequential approach has been taken to flood risk in that panels 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 panels are raised above the ground on narrow supports with appropriate freeboard above ground level and anticipated flood depths as 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-199]**. The provision of this grass cover all year round will

ID	Theme	Representation	Applicant's Response
		• Development would introduce infrastructure into a sensitive river corridor Landscape evidence identifies Site 8b as a highly sensitive landscape parcel, with limited potential for effective mitigation. These constraints are comparable to those that have resulted in mitigation or site removal elsewhere in the scheme.	significantly improve soil stabilisation 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 downstream water receptors. Cable route crossings within Flood Zones 2 and 3 of the River Tas are identified as an Avoidance Zone and will be trenchless. As set out and secured within the **Design Principles, Parameters and Commitments [APP-213]**, there is a commitment to providing a 10m offset from watercourses for all built infrastructure (panels, Substations, BESS and standalone inverter/converter units). The sensitivity of water receptors, including the River Tas, are identified within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. Embedded mitigation measures for flood risk and pollution management have been incorporated for the Scheme as set out and secured within the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**. With the inclusion of these

ID	Theme	Representation	Applicant's Response
			measures, the assessment within **ES Volume 1, Chapter 9 – Water Environment [APP-045]** of likely effects to water receptors are assessed as 'Not Significant' with the exception of the cessation of agricultural use/fertiliser or chemical application which is assessed as 'Significant Major Beneficial'.
SPC-060	Site Selection Water Environment	4.6. Flood Risk and Sequential Approach Policy requires development to be directed to areas at lowest flood risk. The South Norfolk Strategic Flood Risk Assessment states that: • Development should avoid areas at risk where alternatives exist • River corridors should be protected Built development should not normally occur within close proximity to watercourses Given that: • Site 8 lies adjacent to a floodplain corridor • The landform directs runoff toward the watercourse • Its inclusion is inconsistent with the sequential approach, particularly	The assessment in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** explains that the proposed use for Sub-Sites 8A and 8B will be solar panels and a sequential approach has been taken to flood risk in that panels 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 panels are raised above the ground on narrow supports with appropriate freeboard above ground level and anticipated flood depths as secured within the **Design Principles, Parameters and Commitments [APP-213]**.

ID	Theme	Representation	Applicant's Response
		where alternatives have been identified elsewhere.	There is a commitment within the **Design Principles, Parameters and Commitments [APP-213]** to providing a 10m offset from watercourses for all built infrastructure (panels, Substations, BESS and standalone inverter/converter units). Therefore, a sequential approach has been taken to location of development as far as practicable and embedded mitigation (flood risk/pollution management) has been included for protection of the Shotesham Beck/River Tas and other ordinary watercourses running through/adjacent to Sub-Sites 8A and 8B, as set out and secured within the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]** which are secured through the DCO Requirements (see Schedule 2 of the Draft DCO). With the inclusion of these measures, the assessment within **ES Volume 1, Chapter 9 – Water Environment [APP-045]** of likely effects to water receptors are assessed as 'Not Significant' with the exception of the cessation of agricultural use/fertiliser or chemical application which is assessed as 'Significant Major Beneficial'.

ID	Theme	Representation	Applicant's Response
			A proportionate Sequential Test and Exception Test has been undertaken and is presented in Appendix A of the **Planning Statement [APP-209]**.
SPC-061	Site Selection	4.7. Proportionality of Site Contribution Site 8 represents a small proportion of the overall scheme: • Approximately 2.7% of solar panel and BESS area Its removal would: • Have negligible effect on overall generating capacity However, the site gives rise to: • High environmental sensitivity • Multiple unresolved constraints • Limited scope for effective mitigation This creates a clear imbalance between limited benefit and significant harm.	Site 8 has been subject to significant constraint-led refinement through the iterative design process, as set out within the **Design Approach Document [APP-212]**. These design changes demonstrate that the constraints affecting Site 8 have been addressed through a rigorous, evidence-led application of the mitigation hierarchy. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme 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. The **Site Selection Assessment [APP-215]** concludes that there are no locations

ID	Theme	Representation	Applicant's Response
			identified within the search area that are more suitable and available than the proposed location for the Scheme, and, in accordance with paragraph 4.3.24 of NPS EN-1, 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.
SPC-062	Site Selection and Alternatives	4.8. Limitations of Alternatives Assessment The alternatives assessment is limited and lacks transparency. In particular: • No clear comparison of alternative sites or layouts • No systematic evaluation of environmental constraints • Evidence of reactive, rather than constraint-led, design evolution The Statement of Need provides a generic justification for renewable energy	The reasonable alternatives considered by the Applicant have been described in **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]** and the **Site Selection Assessment [APP-215]**. The **Site Selection Assessment [APP-215]** sets out a systematic evaluation of environmental constraints in relation to the Scheme, including Site 8, and potential alternative sites. The **Design Approach Document [APP-212]** sets out the environmentally led approach to the design evolution of the

ID	Theme	Representation	Applicant's Response
		but does not demonstrate why Site 8 is required. In the absence of a robust alternatives assessment, it cannot be concluded that Site 8 represents the least harmful or most appropriate option.	Scheme and refinements made to Site 8 in response to environmental constraints. The case for the scale and general location of the Scheme is set out within the **Statement of Need [APP-206]**. Part 3 of NPS EN-1 NPS explains why the government considers that significant amounts of new large-scale energy infrastructure are urgently needed. NPS EN-1 paragraph 4.3.9 confirms that, from a policy perspective, there is no general requirement to consider alternatives or to establish whether a development represents the best option. NPS EN-1 paragraph 4.3.24 goes on to explain that *"The Secretary of State ... 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."* The Applicant therefore considers other locations (for solar or other low-carbon technologies) should be considered as additional sites, and not as alternative sites to the Scheme.
SPC-063	Site Selection	This map [on page 24 of the document] shows fields within the vicinity of Site 8, which are owned by the same	The land parcels that landowners were willing to make available to the Applicant, and which met the environmental, planning and

ID	Theme	Representation	Applicant's Response
	and Alternatives	landowners who have chosen the fields they want to be used in the East Pye scheme. Site 9 is also owned by the landowner of Site 8 and is in the next parish of Brooke. Given the various constraints of Site 8, it seems very possible that other sites could have been identified and selected, that do not have the same issues as Site 8.	operational criteria set out in the **Site Selection Assessment [APP-215]**, are the Sites forming part of the Order Limits. The Applicant notes that where fields owned by the same landowner have not been included within the Order Limits, this reflects the landowner's own decision as to which parcels of land they wished to make available for the Scheme, together with the Applicant's evaluation of those parcels against the site selection criteria.
SPC-064	Site Selection and Alternatives	4.9. Assessment Deficiencies The assessment of alternatives is affected by: • Lack of comparative analysis between sites • Absence of clear selection criteria • Failure to demonstrate how constraints informed site selection • Reliance on iterative reduction rather than strategic design This limits confidence that environmental harm has been avoided or minimised. Retention of Site Despite Constraints	The Applicant refers to its response to SPC-054 and SPC-062.

ID	Theme	Representation	Applicant's Response
		The retention of Sites 8a and 8b despite known environmental, technical, and safety constraints — including high-pressure gas infrastructure, flood risk, and sensitive ecological features — demonstrates a lack of proportionality and rational site selection. Where similar constraints elsewhere in the scheme have led to site removal or modification, Sites 8a and 8b have been maintained, raising questions about the justification for their inclusion.	
SPC-065	Site Selection and Alternatives	4.12. Policy Conflict The inclusion of Site 8 conflicts with: • EIA Regulations 2017 (failure to properly assess reasonable alternatives) • NPS EN-1 (good design and environmental protection) • NPS EN-3 (consideration of environmental constraints) • Sequential approach to flood risk 4.12. Conclusion The evidence demonstrates that:	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 (arising from all constituent parts of the Scheme, including Site 8) 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

ID	Theme	Representation	Applicant's Response
		• The scheme has evolved elsewhere in response to constraints • Site 8 has not been subject to equivalent design refinement • Significant environmental constraints remain unresolved • Alternatives have not been properly assessed Given: • The limited contribution of Site 8 • The availability of less harmful alternatives • The scale of environmental constraints the inclusion of Sites 8a and 8b is not justified, not proportionate, and not the result of a robust or policy-compliant alternatives assessment. Their removal represents a reasonable, deliverable, and significantly less harmful alternative that would not materially affect the overall performance of the scheme.	the Scheme, such as in relation to biodiversity, green infrastructure strategy, employment and training; that outweigh the less substantial harm identified, as set out within the **Planning Statement [APP-209]**. Regarding the contribution of Site 8 and the availability of alternatives, please refer to the Applicant response provided at SPC-061. Detail of the environmentally-led design evolution of Site 8 in response to constraints is set out within the **Design Approach Document [APP-212]**.

ID	Theme	Representation	Applicant's Response
SPC-066	Policy compliance	Environmental Impacts Chapter 5: Ecology and Biodiversity 5.1. Chapter Summary This chapter demonstrates that Sites 8a and 8b form part of a highly sensitive and functionally connected ecological landscape supporting European Protected Species, priority habitats, and ecological networks linked to the River Tas catchment It shows that: • The site lies within multiple Core Sustenance Zones of barbastelle maternity colonies, including a confirmed colony in close proximity • The ecological assessment contains significant gaps in baseline data • Impact pathways, particularly in relation to hydrological connectivity, are not fully assessed • Effects on barbastelle bats, farmland birds, and aquatic species remain uncertain	The Applicant has addressed concerns regarding Sub-Site 8A and 8B to its response to SPC-020. The likely effects on ecology and biodiversity, including European Protected Species and Priority Habitats are assessed in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**, informed by baseline ecological survey reports. The assessment has considered relevant legislation, planning policy and guidance documents throughout, while the evaluation of ecological receptors complies with guidelines set out by the Chartered Institute of Ecology and Environmental Management (CIEEM) with the method of the assessment. The assessment found that no significant residual effects on ecology and biodiversity are predicted during the construction and decommissioning of the Scheme and moderate beneficial effects during the operational period. 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]**.

ID	Theme	Representation	Applicant's Response
		• The legal tests under the Conservation of Habitats and Species Regulations 2017 cannot be met As a result, there is a high risk of significant ecological harm, and compliance with policy and legal requirements has not been demonstrated. 5.2. Policy and Legal Context Development affecting biodiversity must comply with: • Conservation of Habitats and Species Regulations 2017 • NPS EN-1 §5.4 • National Planning Policy Framework Under the Habitats Regulations, development affecting European Protected Species must demonstrate: • No satisfactory alternative • Imperative Reasons of Overriding Public Interest (IROPI) • Maintenance of favourable conservation status	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 **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]**. In respect to Core Sustenance Zones of barbastelle maternity colonies, 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 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 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. **ES Volume 1, Chapter 8 – Ecology**

ID	Theme	Representation	Applicant's Response
		Where uncertainty exists, the precautionary principle applies.	**and Biodiversity [APP-044]** concludes that there will be a moderate beneficial effect upon bats species (including Barbastelle bat) during the operational phase of the Scheme, with negligible disturbance associated with the construction and decommissioning phases. **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** has been informed by appropriate surveys/assessments of breeding birds and aquatic habitats and detailed within **ES Volume 3, Appendix 8.4 Breeding Bird Survey Report [APP-155]** and **ES Volume 3, Appendix 8.9 - Aquatic Habitat Assessment Report [APP-160]**. With the potential for impacts upon aquatic invertebrates, white-clawed crayfish, and freshwater fish considered to be negligible (not significant) during the construction, operational and decommissioning phases, and moderate beneficial effects to skylark during the operational phase. The DCO submission includes the provision of a stage 1 (screening) **Shadow Habitats Regulations Assessment (sHRA)[AS-036]**. The sHRA is intended to provide the information necessary for the Secretary of State (SoS) (advised by the Planning

ID	Theme	Representation	Applicant's Response
			Inspectorate) to make their assessment of the Scheme as the Competent Authority. The sHRA demonstrates that likely significant effects are not expected to any of the identified European Sites from the Scheme in isolation, or in-combination with other plans or projects. Notably, in their relevant representations Natural England have agreed with the conclusions of the shadow HRA, as such, the Applicant considers that the information provided within the sHRA is wholly sufficient to allow the Secretary of State to undertake a HRA of the Scheme. Baseline data gathering methodology through desk based exercises and targeted survey effort has been agreed with statutory parties (including Natural England) through the EIA scoping process, and is considered to be wholly sufficient to inform the EIA process. The Applicant is satisfied that the assessment of Ecology and Biodiversity is robust and delivers appropriate mitigation and compensation and is legally/policy compliant; as detailed within the **Policy Compliance Document [APP-210]**.

ID	Theme	Representation	Applicant's Response
SPC-067	Ecology and Biodiversity	5.3. Baseline Ecological Context Sites 8a and 8b form part of a wider ecological network associated with: • Ancient woodland • Farmland habitats • The River Tas catchment Habitats are functionally connected through: • Hedgerows and field margins • Woodland blocks • Watercourses and drainage pathways The site has direct hydrological connectivity to the River Tas catchment, providing clear pathways for effects to extend beyond the site boundary. Figure 5.3a – shows important ecological areas within the area of Site 8. The map shows Shotesham Common downstream of Site 8, which is a SSSI. In addition, there is a roadside reserve along the side of Market Lane, adjacent to Site 8a which is not marked on this map. Little Wood which is close to Site 8b is also a SSSI and is highly celebrated by	The Applicant notes this comment and refers to its response to SPC-066. Likely effects on ecology and biodiversity including designated sites and habitats, are assessed in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044]**, with additional consideration of habitat functionality through the Biodiversity Net Gain (BNG) process. The Scheme has been designed to include landscape and ecological enhancement with the landscaping shown in the **Green Infrastructure Strategy [AS-005]** and the long-term habitat management and monitoring measures described in the **Outline LEMP [APP-199]**. The Scheme also provides new permissive paths and community accessible space. Embedded mitigation, including design buffers such as offsets to woodland, hedgerow and watercourses, are set out in Section 8.8 of **ES-Chapter 8 – Ecology and Biodiversity [APP-044]** and the **Design Principles, Parameters and Commitments [APP-213]**. Whilst there is no legislative requirement for the Scheme to provide quantifiable BNG, Requirement 9 of the Draft DCO secures a

ID	Theme	Representation	Applicant's Response
		conservationists because it represents one of the best remaining examples of ancient primary hornbeam forest in the region.	commitment to a minimum of 10% BNG. The Applicant has sought to embed 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]**. Whilst the Schemes design evolution has progressed prior to the publication of the LNRS, the embedded design principles adopted and detailed within **Design Principles, Parameters and Commitments [APP-213]** have been applied to retain, protect and enhance ecological assets. Where possible, areas of land located within the Order Limits designated as 'areas that could become of particular importance' (ACB) within the LNRS have been targeted with their suggested habitat type when developing **ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]**. This not only

ID	Theme	Representation	Applicant's Response
			contributes towards a quantifiable BNG, but also helps to strengthen existing habitat networks and increase landscape connectivity. These measures are calculated within and inform both the **Biodiversity Net Gain Report [APP-218]** and **Biodiversity Net Gain Statutory Metric [APP-219]**.
SPC-068	Ecology and Biodiversity	5.4. Barbastelle Bats (European Protected Species) Baseline and Importance The South Norfolk Claylands support maternity colonies of western barbastelle, a rare and highly sensitive European Protected Species. • At least six Core Sustenance Zones intersect the scheme area • Two colonies are located adjacent to the cable route • A confirmed maternity colony lies in close proximity to Site 8b Survey evidence confirms: • Frequent activity within nearby woodland • Identification of roost trees	The Applicant acknowledges the presence of barbastelle bat *Barbastella barbastellus* 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 utilises intensively managed farmland habitats, which are 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

ID	Theme	Representation	Applicant's Response
		• Presence of pregnant females • A confirmed maternity colony (approximately 55 bats post-parturition) This represents a large and regionally important population. No studies have been carried out to ascertain whether Barbastelle bats also have a maternity roost in Ringer's Grove (a small woodland), on the corner of Wash Lane and Market Lane, adjacent to Site 8a. Assessment of Effects Barbastelles depend on: • Connected woodland and hedgerow networks • Dark, unlit landscapes • Stable landscape structure • The Proposed Development would result in: • Fragmentation of commuting and foraging habitat • Disturbance during construction and operation	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-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. Habitat enhancement is detailed within the **Biodiversity Net Gain Report [APP-218]** which discusses the Schemes adherence to the biodiversity gain hierarchy, and habitat enhancement measures, which are calculated and provided within the **Biodiversity Net Gain Statutory Metric [APP-219]** which is secured via Requirement 9 of the Draft DCO (which

ID	Theme	Representation	Applicant's Response
		• Potential lighting effects • Long-term alteration of landscape structure Given the proximity of a maternity colony, these impacts are likely to be significant, and a European Protected Species Mitigation License will be required Assessment Limitations • Survey coverage is incomplete • Woodland habitats are not fully assessed • Flight corridors and habitat use are not adequately characterised • No robust assessment of Core Sustenance Zone functionality As a result, the scale of habitat use and the magnitude of impact are uncertain, and the effectiveness of mitigation cannot be demonstrated. Habitats Regulations Compliance The available evidence does not demonstrate that:	secures a commitment to a minimum of 10% BNG). 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 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]**. 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

ID	Theme	Representation	Applicant's Response
		• Favourable conservation status would be maintained • Less harmful alternatives have been ruled out (see Chapter 6) Given the intrinsic sensitivity of the site, impacts cannot be fully mitigated through design.	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), contributing towards the species' favourable conservation status. It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for an EPSML for Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would result in: (a) to impair their ability— • to survive, to breed or reproduce, or to rear or nurture their young; or • in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) to affect significantly the local distribution or abundance of the species to which they belong. 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

ID	Theme	Representation	Applicant's Response
			policy set out in section 2.10 of NPS EN-3. 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 Applicant therefore considers that the sites selected have been subject to a robust and transparent process of environmental assessment which verifies their suitability for the Scheme.
SPC-069	Ecology and Biodiversity	5.5. Farmland Birds Baseline Site 8 supports a range of farmland bird species, including: • Skylark • Lapwing • Yellowhammer • Linnet • Corn bunting • Grey partridge • Yellow wagtail • Barn Owls • Tawny Owls	**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 *Alauda arvensis* individually. This was underpinned by baseline surveys, the scope of which has 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]**. Further information regarding bird surveys is provided within **ES Volume 3, Appendix 8.4 Breeding Bird Survey Report [APP-155].** The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [APP-213]**

ID	Theme	Representation	Applicant's Response
		These are predominantly red-listed Birds of Conservation Concern and Species of Principal Importance. Historic data indicates up to 27 skylark territories across the site and surrounding area. Barn owls are also a protected species and have confirmed nesting sites in the surrounding areas. Assessment of Effects Ground-nesting birds are sensitive to: • Habitat loss • Disturbance • Changes in vegetation structure Solar development is known to displace species such as skylark. Barn owls are low-flying birds and will be vulnerable to high security fencing, particularly for recently fledged young. Assessment Limitations • No site-specific breeding bird surveys • No territory mapping • No multi-season survey data As a result, population importance cannot be established, impacts are not	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. Specific measures for farmland birds are set out in the **Outline LEMP [APP-199]**, 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. 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. Further information regarding the creation of habitats within the Scheme is provided within the **Outline LEMP [APP-199]**.

ID	Theme	Representation	Applicant's Response
		quantified, and mitigation cannot be designed.	Research by scientists from the RSPB and University of Cambridge (Copping J P et al. 2025[1]) 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.
SPC-070	Ecology and Biodiversity	5.6. Farmland Mammals Brown hares are common across the sites, and the security fences will prevent them from transversing the fields	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. The Applicant has taken the approach to balance the extent of perimeter fencing in the landscape with these green corridors.

[1] *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
			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]**.
SPC-071	Ecology and Biodiversity	5.7. Aquatic Ecology Baseline Site 8 drains into Shotesham Beck, a tributary of the River Tas. Protected and priority species recorded within the connected network include: • Otter • Water vole • White-clawed crayfish (confirmed breeding population) These species are highly sensitive to sedimentation, pollution, and hydrological change. Figure 5.7a – shows an image of a water vole taken in Shotesham Beck running Shotesham Common. Both water voles and otters have been observed by members of the community in Shotesham Beck. In addition, water	The Applicant acknowledges the observations provided by Shotesham Parish Council regarding the ecological importance of Shotesham Beck and the wider River Tas catchment, including records of otter, water vole and white-clawed crayfish. The Applicant notes that the watercourse referred to as Site 8 within **ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160]** has subsequently been removed from the Scheme's Order Limits as a result of design and boundary changes. Consequently, no works are proposed in this location and there are no identified impact pathways between the Scheme and this watercourse or any associated aquatic receptors. Notwithstanding the above, baseline ecological surveys were undertaken to characterise the receiving environment. The watercourse identified as Site 8 within **ES**

ID	Theme	Representation	Applicant's Response
		voles have also been observed at Market Lane Farm, adjacent to Site 8b. Norfolk is one of the few remaining strongholds for our largest aquatic invertebrate, the white-clawed crayfish. Forming a major part of the food chain and vital for a healthy functioning ecosystem, this creature was once widespread through our rivers. Sadly, pollution and invasive non-native signal crayfish have almost entirely wiped out this native species. In recent times, surveys have revealed that the River Tas is one of a few rivers that are still home to the white-clawed crayfish. Although this is hugely encouraging, these native crayfish remain highly vulnerable. Therefore, it is vital that special care is taken to ensure that water quality is maintained for the survival of this remaining population. Assessment of Effects Hydrological connectivity creates clear pathways for: • Sediment transport • Pollution	**Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160]** was recorded as dry at the time of survey, with no evidence of aquatic habitat features or aquatic receptors. The absence of aquatic vegetation and other indicators of sustained flow suggested that the channel functions as a dry watercourse, likely holding water only following periods of high rainfall events. On this basis, the watercourse was assessed as unsuitable to support aquatic receptors, including white-clawed crayfish. The watercourse was also assessed for water vole and otters within **ES Volume 3, Appendix 8.8 – Water Vole and Otter Survey Report [APP-160]**, where it is identified as survey location D38. The survey concluded that the habitat was sub-optimal for water vole and unsuitable for otter. Given that the watercourse has been removed from the Order Limits and no direct or indirect impact pathways have been identified, the concerns raised regarding sediment transport, pollution, hydrological change and effects on aquatic species are not considered relevant to the assessment of likely significant effects arising from the Scheme. Consequently, no significant effects

ID	Theme	Representation	Applicant's Response
		• Downstream ecological effects Assessment Limitations • Impact pathways are not clearly assessed • Effects on aquatic species are not quantified • Licensing requirements are not addressed The assessment does not establish that impacts can be avoided or effectively mitigated.	on water vole, otter, white-clawed crayfish or other aquatic receptors are anticipated in relation to this location. Impacts to the wider catchment have been assessed within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and appropriate mitigation measures and commitments are secured through the **Outline CEMP [APP-196]** and **Design Principles, Parameters and Commitments [APP-213]**. Accordingly, potential effects on downstream aquatic habitats and species, including those associated with hydrological connectivity, have been appropriately assessed and mitigated where required. The Applicant therefore considers that the assessment is proportionate to the characteristics of the surveyed watercourse and that no further assessment or mitigation is considered necessary in relation to Site 8. Notwithstanding, the Applicant notes the Examining Authority's (ExA) request for further information and potentially for surveys to be carried out for White Clawed Crayfish between July – September, in the **Rule 6 letter [PD-005]**. The Applicant will provide an update on this at Procedural Deadline A as set out in the document **Applicant's Position**

ID	Theme	Representation	Applicant's Response
			on White Clawed Crayfish [EN0110014/EXAM/8.5].
SPC-072	Ecology and Biodiversity	5.8. Habitat Networks and Landscape Function Sites 8a and 8b form part of a wider ecological network comprising: • Ancient woodland • Hedgerows and field margins • Verge habitats and roadside nature reserves These features provide: • Functional connectivity • Ecological value • Landscape structure The Proposed Development would result in: • Loss of hedgerows and trees • Damage to verge habitats • Fragmentation of ecological networks These effects extend beyond the site boundary and affect the wider ecological system.	The Applicant acknowledges that there are ancient woodland, hedgerows and vegetation within or adjacent to sites 8a and 8b. The Scheme would avoid the 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 trees and hedgerows that will be retained. 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]**. Requirement 9 of the Draft DCO secures a commitment to a minimum of 10% BNG. The Applicant has sought to embed BNG into the Scheme design from the early optioneering stages through to submission. A detailed

ID	Theme	Representation	Applicant's Response
			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]**. 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-023].** The Applicant refers to its response to SPC-072 regarding habitat networks.
SPC-073	Ecology and Biodiversity	5.9. Cross-Cutting Assessment Limitations The ecological assessment is affected by a number of cross-cutting limitations (see also Chapter 5), including: • Incomplete bat surveys • Absence of robust breeding bird data	**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. ES Chapter 8 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 scope of survey

ID	Theme	Representation	Applicant's Response
		• Limited assessment of aquatic species • Inadequate evaluation of habitat connectivity As a result, the assessment does not provide a reliable basis to determine the scale of ecological effects or the effectiveness of mitigation.	and assessment has been agreed through the scoping and consultation process, as described in Section 8.2 of the Ecology and Biodiversity Chapter.
SPC-074	Ecology and Biodiversity	5.10. Summary of Effects • Risk to barbastelle maternity colonies within Core Sustenance Zones • Loss and disturbance of farmland bird habitat • Potential downstream effects on aquatic species via hydrological pathways • Fragmentation of ecological networks • Uncertainty due to incomplete baseline evidence 5.11 Policy Conflict The Proposed Development conflicts with:	The Applicant refers to the following responses: • SPC-968 regarding barbastelle bats; • SPC-069 with regard farmland birds; • SPC-071 with regard aquatic ecology; • SPC-072 with regard habitat networks; and • SPC-073 with regard the baseline. 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

ID	Theme	Representation	Applicant's Response
		• Conservation of Habitats and Species Regulations 2017 • NPS EN-1 §5.4 • National Planning Policy Framework • Natural Environment and Communities Act 2006 and Biodiversity Duty The available evidence does not demonstrate that adverse effects would be avoided or that favourable conservation status would be maintained. 5.12. Conclusion Sites 8a and 8b form part of a highly sensitive ecological system supporting European Protected Species and priority habitats. The evidence demonstrates that: • Impacts are intrinsic to the site • Baseline information is incomplete • Impact pathways are not fully assessed • Legal tests under the Habitats Regulations cannot be met	EN-5) pursuant to section 104 of the Planning Act 2008. 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 the **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. The relevant legislation, policy, and guidance for each chapter of the ES is set out within **ES Volume 3, Appendix 2.3 – Legislation, Planning Policy and Guidance [APP-115]**.

ID	Theme	Representation	Applicant's Response
		It is not possible to conclude, beyond reasonable scientific doubt, that the Proposed Development would avoid adverse effects on protected species or maintain favourable conservation status. In these circumstances, the competent authority cannot lawfully grant consent. Consent should therefore be refused on ecological grounds.	
SPC-075	Water Environment	6.1 Chapter Summary This chapter demonstrates that Sites 8a and 8b are hydrologically connected to the River Tas and form part of a highly sensitive chalk stream catchment. It shows that: • The site has direct connectivity to a sensitive receiving environment • Clear pathways exist for runoff, sediment, and pollutants to enter the watercourse • Solar development would alter runoff behaviour, increase erosion, and intensify flood risk • The existing drainage system is already under pressure	The assessment of flood risk for Sub-Sites 8A and 8B within **ES Volume 3, Appendix 9.1- Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** utilises modelling outputs obtained from the Environment Agency and surface water mapping. Site-specific information has therefore been utilised within the assessment. The EA has confirmed in a meeting in December 2025 that they were content with the approach taken to assessing fluvial flood risk and further detailed hydraulic modelling is not required. This data has been used to apply a sequential approach to these Sub-Sites in locating built infrastructure outside 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**

ID	Theme	Representation	Applicant's Response
		• The assessment lacks site-specific modelling and detailed evaluation of impacts • Sensitive receptors, including private water supplies and access routes, are not adequately assessed As a result, there is a credible risk of increased flood risk and deterioration of the water environment, and compliance with policy has not been demonstrated. The proposed development has the potential to significantly alter the hydrological behaviour of the site, particularly in relation to surface water runoff and infiltration. The introduction of solar infrastructure, construction activity, and associated haul roads would lead to soil compaction and degradation, reducing the permeability of the land and its ability to absorb rainfall. This is of particular concern on sloping areas such as Site 8a, where reduced infiltration capacity would increase the rate and volume of surface water runoff, thereby elevating the risk of erosion and localised flooding.	**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 panels are raised above the ground on narrow supports with appropriate freeboard above ground level and anticipated flood depths as secured within the **Design Principles, Parameters and Commitments [APP-213]**. The ground across the panel fields within Sub-Sites 8A and 8B 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. As set out in Section 9 of **ES Volume 3, Appendix 9.1- Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]**, rainfall falling on the solar panels will be spread out through gaps across the panels and drip onto the ground, and

ID	Theme	Representation	Applicant's Response
		These impacts are intrinsically linked to the loss of soil function and agricultural land quality, as set out in Chapter 8 (Soils and Agricultural Land). The degradation of soil structure not only affects agricultural productivity but also undermines the natural drainage characteristics of the land, which play a critical role in managing surface water flows.	percolate into the soil beneath as per the existing drainage regime. There will be no loss of soil function or degradation of soil structure across the Site. This is considered in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]** section 15-8, in respect of the construction and operation phases. The avoidance of compaction through good soil management can be controlled through a Soil Management Plan (an outline of which is provided at the **Outline Soil Resource Management Plan [APP-204]** and will ensure that natural drainage characteristics are not altered for the soils across the Site. There is a commitment within the **Design Principles, Parameters and Commitments [APP-213]** to providing a 10m offset from watercourses for all built infrastructure (panels, Substations, BESS and standalone inverter/converter units). Therefore, a sequential approach has been taken to location of development as far as practicable and embedded mitigation (flood risk/pollution management) has been included for protection of the Shotesham Beck/River Tas and other ordinary watercourses running through/adjacent to

ID	Theme	Representation	Applicant's Response
			Sub-Sites 8A and 8B, as set out and secured within the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**. Sensitive water receptors, including private/public water supplies have been assessed in relation to impacts from changes in water quantity and quality within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. The access routes lie outside of the Order Limits and existing access points onto fields will be used as far as possible. Embedded mitigation measures on site for all phases of the Scheme is proposed as set out and secured within the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]** to ensure that flood risk is not increased elsewhere including access routes outside of the Order Limits. With the inclusion of these measures, the assessment within **ES Volume 1, Chapter 9 – Water Environment [APP-045]** on impacts to water receptors are assessed as 'Not Significant' with the exception of the cessation of agricultural use/fertiliser or chemical application which is assessed as

ID	Theme	Representation	Applicant's Response
			'Significant Major Beneficial', and it is considered that the Scheme will not increase flood risk within the Order Limits or elsewhere, or affect the quality of private water supplies, in accordance with the NPPF and EN-1.
SPC-076	Water Environment	In this context, the scoping out of detailed runoff assessment for the site represents a significant limitation in the Environmental Statement. Given the known characteristics of Site 8a, including its sloping topography and history of localised flooding, a full and site-specific hydrological assessment, including geological and infiltration investigations, is required. Without this, the proposal fails to adequately assess or mitigate its impacts on the water environment, contrary to the principles set out in National Policy Statement for Energy (EN-1) in respect of flood risk and climate resilience. This chapter sits alongside the report carried out by Create Consultancy – East Pye Solar Farm – Land South of Shotesham all Saints – Flooding Issues and Drainage Assessment. This has	The Applicant notes this comment and refers to its response to SPC-075. The runoff dynamics of Sub-Site 8A in relation to surface water flood risk are assessed using the latest EA Risk of Flooding from Surface Water mapping. There is a commitment to siting all built infrastructure outside of all modelled floodplains u to and including the 1 in 1000 (0.1%) annual probability plus allowance for climate change floodplain, and outside of areas of 'low' to 'high surface water flood risk as far as reasonably practicable, as secured within the **Design Principles, Parameters and Commitments [APP-213]**. The EA has confirmed in a meeting in December 2025 that they are content with the approach taken to assessing flood risk and that further detailed hydraulic modelling is not required.

ID	Theme	Representation	Applicant's Response
		been sent via email to the East Pye Solar Planning Inspectorate team.	Geological and groundwater level information has been provided through historic boreholes in the vicinity of the Order Limits within Environmental Statement **ES Volume 3,, Appendix 16.1 – Ground Conditions Assessment [APP-184-186]** which shows that groundwater levels are significantly below ground (greater than 10m). This information also shows that the majority of the Order Limits is underlain by significant thickness of Lowestoft Formation which is clay. On this basis, it is conservative to assume at this stage that infiltration drainage is unlikely to be feasible across the majority of the Order Limits. The Lead Local Flood Authority have also sought 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

ID	Theme	Representation	Applicant's Response
			including infiltration testing will be undertaken post-consent to inform the detailed surface water drainage design.
SPC-077	Policy compliance Water Environment	6.2. Policy Context Development affecting the water environment must comply with: • NPS EN-1 §§4.2, 4.3 and 5.15 • National Planning Policy Framework • Water Framework Directive Regulations Where uncertainty exists, the precautionary principle applies. 6.3. Hydrological Baseline Sites 8a and 8b lie within the drainage catchment of a tributary of the River Tas, a nationally important chalk stream. Chalk streams are: • Globally rare ecosystems • Highly dependent on water quality and stable hydrological conditions • Particularly sensitive to sedimentation and pollution	The Applicant notes this comment. The **Planning Statement [APP-209]** and **Policy Compliance Document [APP-210]** sets out how the Scheme complies with relevant national and local planning policies. Policy and guidance in relation to the water environment is contained within Section 9.3 of **ES Volume 1, Chapter 9 – Water Environment [APP-045]**.

ID	Theme	Representation	Applicant's Response
		The land slopes toward the tributary, establishing a direct hydrological connection between the site and a sensitive receiving environment.	
SPC-078	Water Environment	6.4. Hydrological Pathways There are multiple pathways through which water, sediment, and contaminants may be transported from the site to the watercourse: • Surface runoff • Subsurface flow • Field drains and artificial drainage • Direct proximity to the watercourse These pathways provide a clear mechanism for effects to extend beyond the site boundary. Figure c.4a – shows Site 8, with the tributary of the River Tas running through the centre and through the grounds of Market Lane Farm Figure c.4b – shows the direction of water flow from Site 8 down into the tributary of the River Tas and through the grounds of Market Lane Farm	The Applicant notes this comment. The assessment within **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** considers flood risk from all sources and outlines mitigation for the management of surface water runoff from built elements of the Scheme which is secured within the **Design Principles, Parameters and Commitments [APP-213]** and **Outline OEMP [APP-197]**. Water receptors including watercourses and aquifers (sub—surface) are identified and assessed within **ES Volume 1, Chapter 9 – Water Environment [APP-145]** in relation to changes in surface water quantity and quality arising from the Scheme. The assessment within chapter 9 concludes that with the incorporation of embedded flood risk and pollution management mitigation measures as set out and secured within the **Outline CEMP [APP-196], Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**,

ID	Theme	Representation	Applicant's Response
			the impacts are assessed as 'Not Significant', with the exception of the cessation of agricultural use/application of fertiliser/chemicals which is assessed as 'Significant Major Beneficial'.
SPC-079	Water Environment Cumulative impact	Cumulative and Systemic Risk to the Environment The interconnections between hydrology, ecology, and local landform create compounding and cumulative effects. Sites 8a and 8b lie within a sloping valley system draining to the River Tas, with direct connectivity to sensitive aquatic and terrestrial habitats. Even limited construction impacts may interact through surface runoff, sediment transport, and ecological disturbance, generating effects that are greater than the sum of individual impacts. The EIA fails to account for these systemic risks, undermining confidence in its conclusions.	**ES Volume 1, Chapter 9 – Water Environment [APP-045]** identifies water receptors and their sensitivity and provides an assessment of potential impacts that could occur. With the incorporation of embedded flood risk and pollution management mitigation measures as set out and secured within the **Outline CEMP [APP-196], Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**, the impacts are assessed within chapter 9 as 'Not Significant', with the exception of the cessation of agricultural use/application of fertiliser/chemicals which is assessed as 'Significant Major Beneficial'. 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

ID	Theme	Representation	Applicant's Response
			interrelationship arising as a result of direct effects from other environmental topics.
SPC-080	Water Environment	6.5. Existing Conditions Observed conditions indicate that the hydrological system is already under pressure: • Overtopping of culverts between Sites 8a and 8b • Flooding of access routes • Flooding of Market Lane during heavy rainfall Downstream inundation within the floodplain This demonstrates that: • The drainage system is operating close to capacity • The land functions as part of the floodplain • Access routes are vulnerable to flooding	The Applicant notes these concerns in relation to historic flood history within the vicinity of Sub-Sites 8A and 8B. The embedded mitigation set out within **ES Volume 3, Appendix 9.1- Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** and **ES Volume 1, Chapter 9 – Water Environment [APP-045]** and secured through the **Outline CEMP [APP-196]**, the **Outline OEMP [APP-197], Outline DEMP [APP-198]** and **Design Principles, Parameters and Commitments [APP-213]** will ensure that flood risk is not increased at the site or elsewhere.
SPC-081	Water Environment	6.6. Assessment of Effects Solar development would introduce: • Soil compaction during construction and operation	The Applicant notes these concerns and anecdotal evidence in relation to historic flood history within the vicinity of Sub-Sites 8A and 8B and refers to its response to SPC-075.

ID	Theme	Representation	Applicant's Response
		• Concentration of rainfall along panel drip lines • Alteration of natural drainage pathways • Increased runoff and reduced infiltration These changes are likely to: • Increase runoff rates and velocities • Accelerate delivery of water to the tributary • Increase sediment mobilisation • Increase downstream flood risk This is particularly significant given the sloping topography of the site. Figure 6.6a – shows the extent of the elevation of Site 8b from the hedge line, down to Market Lane, with the roof of Market Lane Farm showing. Figure 6.6b – shows flooding on Site 8a in November 2025. This is a common occurrence	

ID	Theme	Representation	Applicant's Response
		Figure 6.6c – shows a map of Market Lane Farm. The highlighted area shows the extent of flash flooding during periods of high rainfall. This flash flooding covers almost the entirety of Market Lane Farm, apart from the house and garden. Below the map there are pictures to show the flooding corresponding with the letter on the map. Image A (2 images) – shows flooding at the top end of Market Lane Farm. Image B - shows the paddock the other side of the stream (tributary of the river Tas), to Image C. The stream is shown in the foreground of the picture. Image C – shows flooding at Market Lane Farm, approximately 20m from Site 8b. The family who lives at Market Lane have lived there for 11 years and experience this level of flooding at least yearly, sometimes more frequently. The water has never reached the house, but all the surrounding paddocks go underwater, because the volume of the stream is not large enough to carry the volume of water, and the rate of flow is not fast enough.	

ID	Theme	Representation	Applicant's Response
		Image D – shows flooding at the corner of Market Lane, where the transport route between Site 8a and 8b is proposed. Image E – shows the tributary of the River Tas that flows through the centre of Market Lane Farm, full to capacity, but not yet overflowing	
SPC-082	Water Environment Ground Conditions	6.7. Sediment and Pollution Pathways Construction and operation introduce clear sources of sediment and pollution: 1. Soil disturbance from trenching, piling, and vehicle movement 2. Fuels, oils, and construction materials 3. Mobilisation of disturbed soils Chalk streams are highly sensitive to fine sediment, which can: • Smother habitats • Reduce oxygen levels in gravels • Damage aquatic species Given the site's characteristics, there is a clear risk that sediment and pollutants would be transported into the River Tas system.	Construction compounds are not proposed in Sub-Sites 8A and 8B. Where they are proposed across other parts of the Order Limits, the compounds will have appropriate drainage and pollution mitigation as set out and secured within the **Outline CEMP [APP-196]**. Management measures for the movement of vehicles during construction are set out and secured within the **Outline CTMP [APP-201]**. Construction activities within Sub-Site 8A will be limited to the installation of panels and standalone converter/inverter units and construction of internal access tracks. Mitigation measures in relation to soil disturbance surface water management and pollution management for the construction and decommissioning phase of the Scheme are contained within and secured by the **Outline CEMP [APP-196],** the **Outline**

ID	Theme	Representation	Applicant's Response
			DEMP [APP-198] and the Outline CTMP [APP-201].
SPC-083	Water Environment	6.8. Assessment Limitations The assessment of hydrological effects is affected by significant limitations (see also Chapter 5), including: • Absence of site-specific hydrological modelling • No quantified assessment of runoff, infiltration, or flood risk • No assessment of flooding impacts on access routes • Limited evaluation of water quality impacts • Failure to identify and assess all receptors, including private water supplies • No assessment of downstream receptors including Market Lane Farm; • No assessment of the cumulative impact of concentrated panel runoff on sloping ground;	The Applicant notes this comment, and each bullet is addressed in turn in the sub-sections below. <u>Absence of Site-Specific Hydrological Modelling:</u> Datasets from the EA including modelled flood levels and extents have been utilised to assess fluvial flood risk where this is present within the Order Limits, as identified within **ES Volume 3, Appendix 9.1- Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]**. The EA's Risk of Flooding from Surface Water mapping has been used to assess surface water flood risk across the Order Limits and to inform the location of built infrastructure. There is a commitment to siting all built infrastructure outside of all modelled floodplains u to and including the 1 in 1000 (0.1%) annual probability plus allowance for climate change floodplain, and outside of areas of 'low' to 'high surface water flood risk as far as reasonably practicable, as secured within the **Design Principles, Parameters and Commitments [APP-213]**.

ID	Theme	Representation	Applicant's Response
		• No climate change sensitivity analysis specific to Site 8a; • No detailed site-specific modelling or quantified assessment capable of demonstrating how runoff rates, runoff volumes, infiltration behaviour, flow pathways and downstream flood risk will change following construction and operation. The assessment relies on high-level assumptions and outline mitigation rather than demonstrating site suitability. Whilst site runoff has been scoped out across the whole development, Sites 8A and 8B should be treated as an exception due to their sloping topography, direct hydrological connectivity to the River Tas catchment, and documented history of flooding within downstream receptors. Accordingly, a full site-specific hydrological assessment, including geological and infiltration investigations, should be undertaken.	The EA has confirmed in a meeting in December 2025 that they are content with the approach taken to assessing flood risk and that further detailed hydraulic modelling is not required. <u>No quantified assessment of runoff, infiltration/flood risk:</u> The approach to the assessment of flood risk is set out in the response to bullet 1 above. At this stage it is intended that ground investigations including infiltration testing will be undertaken post-consent. 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 majority of the Scheme consists of solar panels which are raised up on narrow supports at an appropriate freeboard above ground level/anticipated flood depths. 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

ID	Theme	Representation	Applicant's Response
			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 surface water drainage arrangements for access tracks and standalone converter/inverter units, and the surface water attenuation volume requirements for the BESS and Substation areas are set out within Section 9 of **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** with provision of detailed surface water drainage design secured through DCO Requirement 11. As such, it is considered that with the implementation of surface water management measures and retention of natural cover across the solar panels across the fields, the Scheme will sufficiently manage flood risk and not increase flood risk elsewhere. <u>No assessment of flooding impacts on access routes:</u> The access routes lie outside of the Order Limits and existing access points onto fields will be used as far as possible. Embedded

ID	Theme	Representation	Applicant's Response
			mitigation measures on site for all phases of the Scheme is proposed as set out and secured within the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]** to ensure that flood risk is not increased elsewhere including access routes outside of the Order Limits. <u>Limited evaluation of water quality impacts:</u> The potential impacts on water receptors in relation to the mobilisation of contaminants from all phases of the Scheme has been assessed in **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. The assessment concludes that with the incorporation of embedded mitigation measures as set out and secured within the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**, the impacts to water receptors from the Scheme are 'Not Significant' with the exception of the cessation of agricultural use/fertiliser or chemical application which is assessed as 'Significant Major Beneficial'. <u>Failure to identify and assess all receptors, including private water supplies:</u> Private water supplies are identified as a receptor in **ES Volume 1, Chapter 9 – Water**

ID	Theme	Representation	Applicant's Response
			Environment [APP-045]. The assessment concludes that with the incorporation of embedded mitigation measures as set out and secured within the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**, the impacts to water receptors from the Scheme are 'Not Significant' with the exception of the cessation of agricultural use/fertiliser or chemical application which is assessed as 'Significant Major Beneficial'. <u>No assessment of downstream receptors, including Market Lane Farm:</u> Downstream receptors, including sensitive ecological sites and watercourses within a 2 km study area have been assessed within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. Whilst the focus on the chapter has been on environmental water receptors and properties downstream of the Order Limits have not been identified. However, even if they were to be included and assessed, the conclusion would be the same as for the other receptors i.e. Not Significant (for impacts in relation to changes in surface water runoff).

ID	Theme	Representation	Applicant's Response
			<u>No assessment of cumulative impact of concentrated panel runoff on sloping ground:</u> As set out in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]**, the panels contain gaps across their faces which reduce the concentration of rainfall falling from one point. Rainfall will drip onto the grass cover and percolate through the soil as per the existing drainage regime. 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. As such, it is considered that solar panels will not increase flood risk elsewhere. <u>No climate change sensitivity analysis specific to Site 8a:</u> Impacts of climate change for both fluvial and surface water flood risk sources have been

ID	Theme	Representation	Applicant's Response
			considered within **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** through the use of EA mapping and modelled flood extents/levels. The assessment confirms that all built infrastructure is located outside of all modelled fluvial floodplains up to and including the 1 in 1000 (0.1%) annual probability plus allowance for climate change event. Climate change in relation to peak rainfall intensity has also been considered in relation to the surface water drainage design, with commitment to providing a drainage system designed 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]**. No detailed site-specific modelling/quantified assessment capable of demonstrating how runoff rates, runoff volumes, infiltration behaviour, flow pathways and downstream flood risk will change following construction and operation. The surface water drainage arrangements for access tracks and standalone converter/inverter units, and the

ID	Theme	Representation	Applicant's Response
			surface water attenuation volume requirements for the BESS and Substation areas are set out within Section 9 of **ES Volume 3, Appendix 9.1- Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** with provision of detailed surface water drainage design secured through DCO Requirement 11. Limited numbers of solar panels are located within 'low' to 'high' surface water flood risk areas within Sub-Site 8A, however the design of the panels are such that they are raised at an appropriate freeboard above the ground on narrow supports, such that flood flow routes are not impeded as secured within the **Design Principles, Parameters and Commitments [APP-213]**. As set out in **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]**, the panels contain gaps across their faces which reduce the concentration of rainfall falling from one point. Rainfall will drip onto the grass cover and percolate through the soil as per the existing drainage regime. The ground across the panel fields will consist of a grass and/or wildflower meadow

ID	Theme	Representation	Applicant's Response
			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. As such, it is considered that with the implementation of surface water management measures and retention of natural cover across the solar panels across the fields, the Scheme will sufficiently manage flood risk and not increase flood risk elsewhere. In relation to the overall suitability of Site 8, the Applicant refers to its response to SPC-061 and more generally within the responses from SPC-013 to SPC-017 and SPC-054 to SPC-065.
SPC-084	Water Environment	6.8A. Applicant's Own Evidence of Flood Risk and Assessment Uncertainty The Applicant's Flood Risk Assessment and Outline Surface Water Drainage Strategy (ES Appendix 9.1, Document Reference APP/6.3.9.1) contains a number of statements that support	Section 5.8 of **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** presents an assessment of surface water flood risk for Sub-Site 8A using the EA 'Risk of Flooding from Surface Water' mapping which was recently updated to utilise more detailed LiDAR terrain.

ID	Theme	Representation	Applicant's Response
		concerns regarding the suitability of Sites 8A and 8B. The Executive Summary acknowledges that: "surface water overland flow routes at increased risk are present across the area, mostly associated with ordinary watercourse tributaries, notably within/along the boundary of... Sub-Site 8A." The FRA therefore confirms that Site 8A contains established surface water flow routes and areas of elevated surface water flood risk. The Applicant further acknowledges at Paragraph 5.7.9 that: "a flow path is present in the eastern part of Sub-Site 8A which is not within the Yare-Tas model." This is a significant admission. The Applicant's own assessment confirms that part of the drainage system affecting Site 8A is not represented within the principal flood model used to assess flood risk. Whilst the Applicant notes that updated Environment Agency mapping	The report acknowledges the presence of surface water flow routes within Sub-Site 8A; however, a sequential approach has been taken to locating built infrastructure outside of areas of surface water flood risk as far as reasonably practicable. Whilst limited numbers of panels are located within 'low' to 'high' surface water flood risk, the depths of flooding are shown to be shallow on the EA mapping. In addition, the solar panels are designed to be operational in times of flood through being raised on narrow supports at an appropriate freeboard above the ground and anticipated flood depths as secured within the **Design Principles, Parameters and Commitments [APP-213]**. The EA confirmed in a meeting in December 2025 that they were content with the approach to assessment of fluvial and surface water flood risk within **ES Volume 3, Appendix 9.1 - Flood Risk Assessment and Outline Surface Water Drainage Strategy [AS-018]** and that further detailed hydraulic modelling was not required.

ID	Theme	Representation	Applicant's Response
		subsequently incorporated this feature, the statement nevertheless raises concerns regarding the completeness of the underlying modelling and whether all flood mechanisms affecting Site 8A have been fully assessed and understood.	
SPC-085	Water Environment	The FRA also confirms that flooding is a recognised issue within the wider area. Paragraph 5.2.3 states: "The NCC Flood Investigation Reports indicate that flooding has occurred on local roads and properties of villages in the vicinity of the Order Limits..." This acknowledgement is directly relevant to concerns regarding flooding in and around Shotesham, including Market Lane and associated drainage routes. The assessment also relies significantly upon broad-scale modelling assumptions. Paragraph 5.8.5 states: "The EA's surface water maps are created using a generic methodology on a national scale..." Whilst the Applicant uses this statement to explain perceived limitations in Environment Agency mapping, it equally	The Applicant notes this comment and refers to its response to SPC-083 and SPC-084.

ID	Theme	Representation	Applicant's Response
		demonstrates that elements of the assessment rely upon generic national-scale modelling rather than detailed local investigation. Importantly, although the FRA discusses flooding affecting local roads and acknowledges elevated surface water flow routes within Site 8A, it contains no specific assessment of flooding associated with Market Lane, Wash Lane or Baxter's Lane, despite these roads forming part of the wider access strategy for the Scheme. Taken together, these acknowledgements demonstrate that uncertainty remains regarding the hydrological behaviour of Sites 8A and 8B and their contribution to downstream flood risk.	
SPC-086	Water Environment	8.6B. Review of the Create Consultancy Report in Light of FRA Revisions The Create Consultancy report, East Pye Solar Farm – Land South of Shotesham All Saints – Flooding Issues and Drainage Assessment (October 2025), was prepared prior to the final submission of the Applicant's revised Flood Risk	The Applicant notes this comment and refers to its response to SPC-083. The Applicant notes the Create Consultancy Report 'Flooding Issues and Drainage Assessment' (October, 2025), whilst this appears to be based on a review of the PEIR, and therefore not the most up to date Application material, the Applicant will

ID	Theme	Representation	Applicant's Response
		Assessment and Outline Surface Water Drainage Strategy. Since publication of the Create report, the Applicant has expanded its assessment of surface water flood risk, introduced outline drainage proposals, and provided additional discussion of flood pathways and climate change. These revisions address some of the procedural criticisms identified by Create Consultancy. However, the principal findings of the Create report remain largely unchanged. Create identified multiple historic flooding events affecting local roads and downstream receptors and characterised the catchment as highly responsive to rainfall events. The revised FRA confirms that flooding has occurred within nearby settlements and on local roads, supporting concerns regarding the sensitivity of the receiving environment. Create also identified a flow path within eastern Site 8A that was not represented within the Yare-Tas model. This concern is now acknowledged within the Applicant's own FRA.	consider this and if necessary submit a separate response to this report at Deadline 1.

ID	Theme	Representation	Applicant's Response
		The Create report further concluded that Sites 8A and 8B form part of a common drainage basin draining towards Shotesham and the River Tas. The Applicant has not produced any competing catchment analysis that would undermine this conclusion. Whilst the revised FRA proposes outline mitigation measures, including infiltration features and drainage infrastructure, detailed hydraulic calculations, exceedance routing assessments, maintenance arrangements and site-specific drainage designs remain absent from the application. Important aspects of the drainage strategy therefore remain unresolved.	
SPC-087	Water Environment	National planning policy requires that development should not increase flood risk elsewhere. Create Consultancy concluded that the information submitted by the Applicant did not adequately demonstrate that runoff rates, runoff volumes, or downstream flood risk would remain unchanged. Although the Applicant has subsequently expanded the FRA, uncertainty remains regarding runoff concentration, drainage	The Applicant notes this comment and refers to its response to SPC-083 which demonstrates that through the embedded mitigation and utilisation of the sequential approach as far as reasonably practicable, the infrastructure proposed within the Scheme will be safe and remain operational for its lifetime and will not increase flood risk elsewhere in accordance with the NPPF and EN-1.

ID	Theme	Representation	Applicant's Response
		performance and the interaction of the development with an already flood-sensitive catchment. Consequently, whilst some procedural criticisms have been addressed, the core conclusions of the Create Consultancy report remain valid and continue to support a precautionary approach. The assessment relies on high-level assumptions and outline mitigation, rather than demonstrating site suitability. Whilst site run-off has been scoped out across the whole development, Site 8a and B should be an exception due the sloping nature of the land, and the known historic risk of flooding. Accordingly, a full assessment, including a geological investigation should be carried out.	
SPC-088	Water Environment	6.9. Private Water Supplies and Local Receptors Local receptors are not adequately assessed. In particular: • A private water supply at Market Lane Farm is not clearly identified or assessed	The impacts on groundwater receptors (including aquifers that feed the private water supplies) have been assessed in relation to groundwater recharge. Risks to human health and groundwater receptors have been assessed within **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]**.

ID	Theme	Representation	Applicant's Response
		• Localised impacts on groundwater and drinking water supplies are not evaluated • This is addressed in more detail in Chapter 7 As a result, risks to human health and water quality remain uncertain.	As recognised by Chapter 7 of the objection, the private water supplies within the 250m Study Area around Sub-Sites 8A and 8B have been assessed, and the properties with Private Water Supplies (PWS) identified in Figure 7.3a of the objection appear to correlate to the locations of the 10No. private and permitted water supplies, and BGS water wells, used to undertake the assessment within the **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]** and **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]**. It is noted that (as per the note on **ES Volume 2, 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 due to GDPR concerns. As described in Table 3.11 of the **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]**, where borehole logs are available, and where information has been provided during consultations, the boreholes within the Sub-Site 8A and 8B Study Areas are (or are

ID	Theme	Representation	Applicant's Response
			assumed, based on the geology) to extract water from the chalk at depths of between approximately 20m and 45m below ground level. The geology overlying the chalk in this area comprises Diamicton, which is predominantly cohesive and as shown on **ES Volume 2, Figure 16.4 - Diamicton Thickness [APP-108]** extends to a thickness of approximately 20m in the area of Sub-Sites 8A and 8B. It is recognised that the composition of Diamicton can be variable, however a laterally or vertically extensive groundwater body is not anticipated to be present. Ground investigation will be undertaken post-consent to confirm the assumptions made. 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 proposed works in Sub-Sites 8A and 8B comprise PV arrays with shallow foundations (maximum 4m deep) and will therefore not interact (on the basis of the geology encountered within the abstraction boreholes)

ID	Theme	Representation	Applicant's Response
			with the underlying aquifers from which the private water supplies appear to abstract. Whilst a Source of Potential Contamination (SPC) has been identified within Sub-Site 8B (SPC8 - Former 'Market Lane Pit'), as shown on **ES Volume 2, Figure 16.3 - Sources of Potential Contamination [APP-107]**, Sheet 2 of the **Works Plan [AS-002]** shows that the only works in the area of the SPC will be Works 10 - "*works to create and maintain habitat management areas*". These works will not be capable of creating an impact which could lead to any effects on PWS. Embedded mitigation for the management of pollution risk to receptors (leaks / spills / contaminants in surface water runoff), including private water supplies and the River Tas 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.

ID	Theme	Representation	Applicant's Response
			In conclusion, risks to the PWS within the Study Area around Sub-Sites 8A and 8B have not been identified as: • The PWS abstract from the chalk at significant depth beneath the overlying Diamicton. • The works within Sub-Sites 8A and 8B will not penetrate the Diamicton, and ground investigation will be undertaken to confirm the design. • The works within Sub-Site 8B will not involve ground disturbance that could mobilise contamination from the former Market Lane Pit (i.e., the baseline is maintained). Embedded mitigation for pollution management for all phases of the Scheme is provided to manage the risk of pollution incidences to water receptors.
SPC-089	Water Environment	6.10 Summary of Effects • Increased runoff and altered hydrological behaviour • Increased flood risk, including to access routes	**ES Volume 3, Appendix 2.3 – Legislation, Planning Policy and Guidance [APP-115]** details where in the relevant Chapters that the requirements of EN-1, the NPPF and the Water Framework Directive have been addressed.

ID	Theme	Representation	Applicant's Response
		• Sediment and pollution impacts on a sensitive chalk stream • Pressure on an already constrained drainage system • Potential effects on private water supplies 6.11 Policy Conflict The Proposed Development conflicts with: • NPS EN-1 §§4.2, 4.3 and 5.15 • National Planning Policy Framework • Water Framework Directive Regulations The available evidence does not establish that flood risk would be controlled, water quality protected, or sensitive receptors safeguarded.	The Applicant refers to its response to SPC-088 regarding impacts on private water supplies. For impacts in relation to flood risk, runoff/hydrological behaviour and historic flooding, the Applicant refers to its response to SPC-083.
SPC-090	Water Environment	6.11A. Exception Test and Flood Risk Policy The National Planning Policy Framework requires that where development is proposed in areas at risk of flooding, and where the Exception Test applies, it must be demonstrated that:	The Applicant notes this comment and refers to its response to SPC-083. A proportionate Sequential Test and Exception Test is provided in **Planning Statement [APP-209]**. The Applicant has applied both the Sequential and Exception Tests and demonstrated how these have

ID	Theme	Representation	Applicant's Response
		1. The development provides wider sustainability benefits that outweigh flood risk; and 2. The development will be safe for its lifetime, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Whilst the Proposed Development may contribute towards renewable energy generation and national decarbonisation objectives, these benefits do not remove the requirement to demonstrate that the development will be safe for its lifetime and will not increase flood risk elsewhere. The evidence presented in this chapter demonstrates that Sites 8a and 8b form part of a sensitive hydrological system characterised by: • Sloping topography directing runoff towards downstream receptors • Existing flooding of Market Lane and adjacent land during periods of heavy rainfall • Overtopping of culverts and constrained drainage infrastructure	been met in line with relevant policy. The most vulnerable elements of infrastructure being the National Grid Substation, the BESS and Project Substations (along with the Solar PV Arrays), would be sited in areas of Flood Zone 1, at lower risk of flooding. The wider sustainability benefits delivered by the Scheme, which include low carbon electricity in support of Government's energy policy aims, green infrastructure and habitat creation, provision of permissive paths and community accessible space, job education and skills creation, overwhelmingly outweigh the flood risk and the Scheme.

ID	Theme	Representation	Applicant's Response
		• Direct hydrological connectivity with the River Tas catchment • The presence of private water supplies and residential receptors immediately downstream	
SPC-091	Water Environment	The Environmental Statement does not contain site-specific hydrological modelling capable of demonstrating how runoff rates, runoff volumes, peak flows, infiltration rates or flow pathways will change following construction and operation of the Proposed Development. Nor does it provide a quantified assessment of impacts on downstream receptors including Market Lane Farm, private water supplies, Market Lane itself, or other properties located within the receiving catchment. In the absence of such evidence, it has not been demonstrated that: • Flood risk will not increase elsewhere • Existing flooding problems will not be exacerbated • Surface water pathways will not be altered to the detriment of downstream receptors	The Applicant refers to its response to SPC-088 regarding impacts on private water supplies. For impacts in relation to flood risk, runoff/hydrological behaviour and historic flooding, the Applicant refers to its response to SPC-083.

ID	Theme	Representation	Applicant's Response
		• Sensitive groundwater and private water supply receptors will remain protected • The development will be safe throughout its operational lifetime, including under future climate change scenarios The Applicant has therefore failed to provide sufficient evidence to demonstrate compliance with the second limb of the Exception Test. Furthermore, given the known flooding history of the site and surrounding area, the absence of detailed hydrological modelling and geological investigation creates significant uncertainty regarding the true extent of potential impacts. In accordance with the precautionary principle and the requirements of NPS EN-1, this uncertainty should be afforded substantial weight. Accordingly, the Examining Authority cannot be satisfied that the Proposed Development meets the requirements of national flood risk policy or, where applicable, the Exception Test.	

ID	Theme	Representation	Applicant's Response
SPC-092	Water Environment	6.12. Conclusion Sites 8a and 8b form part of a hydrologically sensitive system directly connected to the River Tas catchment. The evidence demonstrates that: • Clear pathways exist for runoff, sediment, and pollutants • The site is already affected by flooding and drainage constraints • The Proposed Development would alter hydrological processes The assessment is incomplete and relies on uncertain mitigation It cannot be concluded that: • Flood risk would be avoided • Water quality would be protected • Sensitive receptors would not be affected In the absence of sufficient and reliable evidence, the decision-maker cannot be satisfied that the development would avoid harm to the water environment. The Applicant's own Flood Risk Assessment acknowledges elevated	The Applicant notes this comment and refers to the detailed responses to comments above.

ID	Theme	Representation	Applicant's Response
		surface water flow routes within Site 8A, a flow path not represented within the principal Yare-Tas model, and a history of flooding affecting roads and properties within nearby settlements. These admissions reinforce the conclusion that uncertainty remains regarding the hydrological behaviour of Sites 8A and 8B and the potential for increased flood risk elsewhere. East Pye has scoped out detailed runoff assessment across the entire project despite Site 8a being one of the most topographically sensitive sites in the scheme and despite clear evidence of existing flooding immediately downstream. This uncertainty attracts substantial weight and weighs strongly against the inclusion of Site 8 within the Proposed Development.	
SPC-093	Water Environment	Chapter 7. Private Water Supply and Groundwater Risk 7.1. Chapter Summary This chapter identifies the risk posed by the Proposed Development to a private drinking water supply at Market Lane	The Applicant refers to its responses to SPC-088. **ES Volume 3, Appendix 2.3 – Legislation, Planning Policy and Guidance [APP-115]** details where in the relevant Chapters that the requirements of EN-1, the NPPF and the

ID	Theme	Representation	Applicant's Response
		Farm, and six properties on Baxter's Lane and to the wider groundwater system. It demonstrates that: • A highly sensitive receptor is present immediately adjacent to Site 8 • The site lies within a groundwater recharge area and Source Protection Zone • Credible contamination pathways exist during both construction and operation • Baseline information is limited and key assessments are deferred to post-consent stages • No site-specific hydrogeological assessment has been undertaken As a result, there is a clear risk to groundwater quality and human health, and compliance with national policy has not been demonstrated. 7.2. Policy Context Development affecting groundwater and drinking water supplies must comply with:	Water Framework Directive have been addressed. The assessments presented in **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]** and **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]** rely on desk-based information, and the assessments of both risk and effect presented in both of these documents have been undertaken on a reasonable-worst case basis to account for uncertainty at this stage. As agreed with the Environment Agency, ground investigation will be undertaken post-consent to refine the Conceptual Site Model. 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.

ID	Theme	Representation	Applicant's Response
		• NPS EN-1 §§4.2.5 and 4.3.3 • NPS EN-1 §5.15.8 • National Planning Policy Framework Where uncertainty exists, the precautionary principle applies.	
SPC-094	Water Environment	7.3. Baseline Conditions and Receptor Identification Market Lane Farm, located immediately adjacent to Site 8b and downstream off all water run off from Site 8a and 8b, relies on a private groundwater abstraction for its drinking water supply. In addition, there are several other properties in the vicinity of Site 8 who also rely on private water supplies for their drinking water. Figure 7.3a – shows properties with private water supplies near Site 8. Mains water is NOT available to any of these properties. Private water supplies are highly sensitive receptors because they: • Depend directly on groundwater quality	The Applicant refers to its response to SPC-088. Consideration of the private water supply at Market Lane Farm and other known private water supplies in the vicinity of Site 8 is provided in Table 3.11 of **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]**. For each of the supplies, a screening exercise has been undertaken, giving consideration to the nearest elements of the Scheme, whether Potential Sources of Contamination (PSCs) are present within the Order Limits within 250m of the private water supply, the construction details (where these have been provided) and the likely strata from which the supply abstracts. The assessment concludes "*The majority of the identified potentially active PWS or permitted abstractions within the 250m Study Area for any part of the Order Limits that will be used for either the cable route or for PV arrays are not located within 250m of a SPC within the*

ID	Theme	Representation	Applicant's Response
		• May have limited treatment infrastructure • Are vulnerable to localised contamination The presence of this borehole was identified during consultation. However: • No site-specific assessment has been undertaken • No baseline groundwater quality data has been collected • No site visit has been carried out This reflects a wider limitation in baseline evidence. Figure 7.3b – shows the distance of 38.25m from Site 8b to the borehole for Market Lane Farm's private water supply.	*Order Limits. In absence of PSCs within the Order Limits, risks to these PWS from mobilisation of existing contamination have not been identified".* None of the known private water supplies in the vicinity of Site 8 are within 250m of a PSC. As described in **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]**: "A*s 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".*
SPC-095	Water Environment	7.4. Hydrogeological Context Site 8 lies within a sensitive hydrogeological environment: • Within the River Tas catchment • Within a groundwater recharge area • Within a Source Protection Zone (SPZ3)	As described in the **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]**, the geology overlying the chalk in this area comprises Diamicton, which is predominantly cohesive and as shown on **ES Volume 2, Figure 16.4 - Diamicton Thickness [APP-108]** extends to a thickness of approximately 20m in the area of Sub-Sites 8A and 8B. It is recognised

ID	Theme	Representation	Applicant's Response
		• Within an area of groundwater vulnerability These conditions indicate that: • Pollutants introduced at the surface may reach groundwater • The site contributes to water feeding local abstractions The sloping topography establishes a direct pathway between Site 8 and the adjacent borehole supply.	that the composition of Diamicton can be variable, however a laterally or vertically extensive groundwater body is not anticipated to be present. Ground investigation will be undertaken post-consent to confirm the assumptions made. 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 proposed works in Sub-Sites 8A and 8B comprise PV arrays with shallow foundations (maximum 4m deep) and will therefore not interact (on the basis of the geology encountered within the abstraction boreholes) with the underlying aquifers from which the private water supplies appear to abstract. Whilst a Source of Potential Contamination (SPC) has been identified within Sub-Site 8B (SPC8 - Former 'Market Lane Pit'), as shown on **ES Volume 2, Figure 16.3 - Sources of Potential Contamination [APP-107]**, Sheet 2 of the **Works Plan [AS-002]** shows that the only works in the area of the SPC will be

ID	Theme	Representation	Applicant's Response
			Works 10 - "*works to create and maintain habitat management areas*". In conclusion, risks to the PWS within the 250m Study Area around Sub-Sites 8A and 8B have not been identified as: • The works within Sub-Sites 8A and 8B will not penetrate the Diamicton, and ground investigation will be undertaken to confirm the design. • The works within Sub-Site 8B will not involve ground disturbance that could mobilise contamination from the former Market Lane Pit (i.e., the baseline is maintained).
SPC-096	Water Environment Ground Conditions	7.5. Contamination Pathways The Proposed Development introduces multiple contamination pathways. Construction phase: • Fuel and oil spills • Soil disturbance and mobilisation of contaminants • Trenching and excavation	The mentioned impacts on water receptors from potential pollution sources mentioned in the consultee's comment have been assessed within **ES Volume 1, Chapter 9 – Water Environment [APP-045]**. Through the incorporation of embedded mitigation measures as set out in the **Outline CEMP [APP-196], Outline OEMP** and **Outline DEMP [APP-198]**, the impacts are assessed as 'Not Significant'.

ID	Theme	Representation	Applicant's Response
		• Creation of preferential pathways through piling Operational phase: • Herbicide use • Potential release from damaged infrastructure • Concentrated runoff from panel drip lines Given the site's hydrogeological connectivity, these represent credible mechanisms for contamination of the borehole supply.	
SPC-097	Water Environment Ground Conditions	7.6. Assessment of Effects The combination of: • Groundwater vulnerability • Direct hydrological connectivity • Presence of a sensitive receptor • Potential contamination sources creates a clear risk of: • Groundwater contamination • Degradation of water quality	The Applicant refers to its response to SPC-088 and SPC-095. As described in Table 3.11 of the **ES Volume 3, Appendix 16.1 - Phase 1 Ground Conditions Assessment [APP-184]**, where borehole logs are available, and where information has been provided during consultations, the boreholes within the Sub-Site 8A and 8B Study Areas are (or are assumed, based on the geology) to extract water from the chalk at depths of between approximately 20m and 45m below ground level.

ID	Theme	Representation	Applicant's Response
		• Impacts on potable water supply These effects may arise from both routine activities and accidental events. 7.7. Assessment Limitations The assessment is affected by significant limitations (see also Chapter 5), including: • Absence of a hydrogeological assessment of the borehole at Market Lane Farm, or other properties in the vicinity of Site 8 • No delineation of recharge areas • No baseline groundwater quality data • No quantitative risk assessment • Limited intrusive ground investigation The Environmental Statement confirms that ground conditions are not fully understood and that further investigation is deferred to post-consent. As a result, the magnitude of risk and the effectiveness of mitigation are not established.	The geology overlying the chalk in this area comprises Diamicton, which is predominantly cohesive and as shown on **ES Volume 2, Figure 16.4 - Diamicton Thickness [APP-108]** extends to a thickness of approximately 20m in the area of Sub-Sites 8A and 8B. It is recognised that the composition of Diamicton can be variable, however a laterally or vertically extensive groundwater body is not anticipated to be present. As described in **ES Volume 1, Chapter 16 - Ground Conditions [APP-052]** "A*s 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]** 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 proposed works in Sub-Sites 8A and 8B comprise PV arrays with shallow foundations (maximum 4m deep) and will therefore not interact (on the basis of the geology encountered within the abstraction boreholes)

ID	Theme	Representation	Applicant's Response
			with the underlying aquifers from which the private water supplies appear to abstract. Whilst a Source of Potential Contamination (SPC) has been identified within Sub-Site 8B (SPC8 - Former 'Market Lane Pit'), as shown on **ES Volume 2, Figure 16.3 Sources of Potential Contamination [APP-107]**, Sheet 2 of the **Works Plan [AS-002]** shows that the only works in the area of the SPC will be Works 10 - "*works to create and maintain habitat management areas*". These works will not be capable of creating an impact which could lead to any effects on PWS. 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 detailed surface water drainage design is secured through DCO Requirement 11. In conclusion, risks to the PWS within the Study Area around Sub-Sites 8A and 8B have not been identified as:

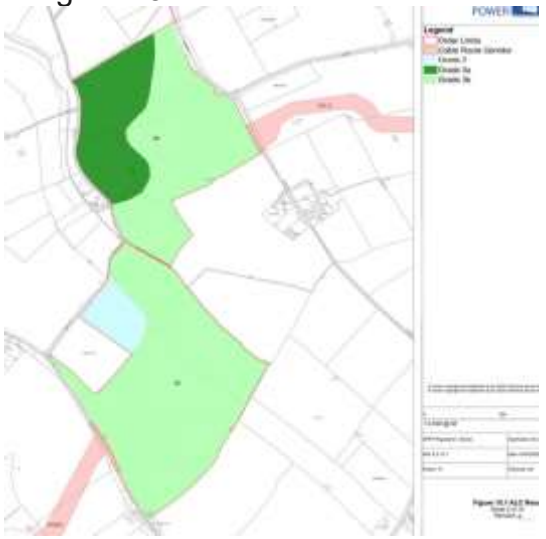
ID	Theme	Representation	Applicant's Response
			• The PWS abstract from the chalk at significant depth beneath the overlying Diamicton. • The works within Sub-Sites 8A and 8B will not penetrate the Diamicton, and ground investigation will be undertaken to confirm the design. • The works within Sub-Site 8B will not involve ground disturbance that could mobilise contamination from the former Market Lane Pit (i.e., the baseline is maintained). • Embedded mitigation for pollution management for all phases of the Scheme is provided to manage the risk of pollution incidences to water receptors.
SPC-098	Water Environment Ground Conditions	7.8. Relationship with the River Tas Catchment Groundwater and surface water systems are interconnected. Site 8 forms part of the River Tas catchment, meaning that: • Contamination may affect both groundwater and surface water	The Applicant refers to its response to SPC-088 and SPC-095.

ID	Theme	Representation	Applicant's Response
		• Effects may extend beyond the site boundary • Risks to private water supplies are linked to wider ecological impacts This reinforces the sensitivity of the receiving environment.	
SPC-099	Water Environment Ground Conditions	7.9. Limitations of Mitigation The Environmental Statement relies on outline mitigation and post-consent controls. However: • Measures are not fully defined • Effectiveness is not demonstrated Implementation is uncertain Residual risks remain from: • Accidental spills • Equipment failure • Extreme weather • Long-term soil degradation Where a private drinking water supply is present, even minor contamination events may have significant impacts.	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]** "A*s 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
			Embedded pollution management measures are set out and secured through the **Outline CEMP [APP-196], Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**. With the incorporation of these measures, the assessment of impacts in relation to the mobilisation of contaminants from the Scheme in **ES Volume 1, Chapter 9 – Water Environment [APP-045]** is concluded to be 'Not Significant'.
SPC-100	Policy Compliance	7.10 Summary of Effects • Risk of contamination to a private drinking water supply • Potential impacts on human health • Degradation of groundwater quality • Linked impacts on the wider River Tas system • Uncertainty due to lack of site-specific assessment 7.11 Policy Conflict The Proposed Development conflicts with: • NPS EN-1 §§4.2.5, 4.3.3 and 5.15.8	The Applicant refers to its response to SPC-088, SPC-095 and SPC-099. **ES Volume 3, Appendix 2.3 – Legislation, Planning Policy and Guidance [APP-115]** details where in the relevant Chapters that the requirements of EN-1, the NPPF and the Water Framework Directive have been addressed.

ID	Theme	Representation	Applicant's Response
		• National Planning Policy Framework The available evidence does not establish that groundwater quality would be protected or that risks to human health would be avoided.	
SPC-101	Summary of concerns	7.12. Conclusion The Proposed Development introduces credible contamination pathways within a groundwater recharge area serving a private drinking water supply. The evidence demonstrates that: • A highly sensitive receptor is present • There are clear contamination pathways • Baseline information is limited • The assessment relies on post-consent investigation It cannot be concluded that: • The borehole supply would be protected • Contamination pathways would be effectively controlled	The Applicant refers to its response to SPC-088, SPC-095 and SPC-099.

ID	Theme	Representation	Applicant's Response
		• Risks to human health would be avoided In the absence of sufficient and reliable evidence, and applying the precautionary principle, the decision-maker cannot be satisfied that the Proposed Development would avoid unacceptable harm. This uncertainty attracts substantial weight and weighs strongly against the inclusion of Site 8 within the Proposed Development.	
SPC-102	Soils and Agriculture	Chapter 8: Soils and Agricultural Land 8.1 Chapter summary This chapter assesses the impacts of the Proposed Development on soils and agricultural land at Sites 8a and 8b. It demonstrates that: • The soils are highly sensitive to compaction and structural damage • Solar development introduces clear mechanisms for long-term degradation	Chapter 8 of the Council's objection, as broken down into component parts, is responded to in this response, with cross-references provided in SPC-103 to 108. The response notes that baseline information is limited, whereas there is a detailed Agricultural Land Classification report including soils, taken on a 100m grid. This is set out at **ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182]**. The objection notes that land quality of Parcels 8A and 8B "are likely to fall within BMV", but the **ES Volume 3, Appendix 15.1 - Agricultural Land Classification [APP-182] [APP-182]** and the plan at **ES Volume 2, Figure 15.1 - ALC Results [AS-010]**,

ID	Theme	Representation	Applicant's Response
		• Soil impacts are likely to be long-term or irreversible within agricultural timescales • Best and Most Versatile (BMV) agricultural land would be degraded • Soil disturbance may mobilise existing or unknown contamination • Soil degradation would alter hydrological behaviour and increase runoff • The proposed haul routes across sites 8a and 8b would exacerbate compaction and reduce surface water drainage Baseline information is limited, and key aspects of soil condition and contamination are not fully understood. As a result, soil impacts have not been robustly assessed, and compliance with national policy has not been demonstrated. Figure 8.1a - shows the soil grading classification in the area of the East Pye Solar proposal.	identify that Parcel 8A is mostly subgrade 3b with only a modest patch of Grade 2, and Parcel 8B is subgrade 3b with an area of subgrade 3a. This is shown below.  In addition to the technical ALC report, the following are also part of the application: • **ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051]**; • **Outline Soil Resource Management Plan [APP-204]**; and • **ES Volume 3, Appendix 15.2 - Farm Reports [APP-183]**.

ID	Theme	Representation	Applicant's Response
		Figure 8.2b - shows the area of Site 8a and b, demonstrating that Site 8 is made of a mix of Grade 2 and Grade 3 soils.	The Council's Figures 8.1a and 8.2b reference the provisional ALC maps, which were those available at the time of the ES. Section 7 of the Landscape and Visual Matters document submitted separately by Shotesham Parish Council (see the Applicant response to the Executive Summary of this report at references SPC-171 to SPC-172) the Predictive Agricultural Land Classification Map for England, published by Defra in May 2026, and which supersedes the provisional maps. Both are predictive. The detailed ALC at **ES Volume 3: Appendix 15.1 - Agricultural Land Classification [APP-182]** provides a definitive ALC grading. Therefore, the Applicants documents do robustly determine baseline information and assess impacts.
SPC-103	Soils and Agriculture	8.2. Policy Context Development affecting soils and agricultural land must comply with: • NPPF §§174, 180 and 181 • NPS EN-1 §§4.2.5 and 4.3.3 • NPS EN-1 §5.15.8	Policy references are assessed in in Section 15.3 of **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. Baseline conditions are described in **ES Volume 3: Appendix 15.1 Agricultural Land Classification [APP-182]**. The land quality of sites 8A and 8B is mostly subgrade 3b "moderate" quality, with an area of Grade 2 "very good" quality and 3a "good quality", as described in SPC-102. The individual

ID	Theme	Representation	Applicant's Response
		Best and Most Versatile land should be protected, and soil resources conserved. 8.3. Baseline Conditions Sites 8a and 8b comprise actively managed agricultural land forming part of the wider rural landscape. The soils are predominantly: • Clay and clay loam (Beccles 1 series) • Slowly permeable • Seasonally waterlogged These soils: • Are likely to fall within BMV land (Grades 2 and 3a) • Have a long field capacity period (110–118 days) • Are structurally sensitive and vulnerable to compaction Ground condition data is limited, and potential contamination has not been fully characterised.	auger locations are shown in the ALC, with the description provided in the tables. As set out in the **Planning Statement [APP-209]**: • The Scheme demonstrates overall compliance with NPS EN-1 (Ref 2) and NPS EN-3. Although the Scheme does include BMV land, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach. In accordance with national policy, the Applicant has sought to minimise impacts on soil health and promote soil quality through mitigation. • NPS EN-3 acknowledges that ground-mounted solar is not prohibited on BMV land and should not be a predominant factor in site selection. However, the use of agricultural land has been shown to be necessary, and the Applicant has considered the economic and other benefits of BMV quality land in line with the policy requirements. The Applicant has also provided justification for the inclusion of BMV land, including the

ID	Theme	Representation	Applicant's Response
			substantial wider benefits that the Scheme will bring. Ground Conditions have been assessed in **ES Volume 1, Chapter 16 – Ground Conditions [APP-052]**.
SPC-104	Soils and Agriculture	8.4. Mechanisms of Soil Damage The Proposed Development introduces multiple mechanisms for soil degradation. Construction phase: • Heavy machinery trafficking • Trenching and excavation • Piling and installation of infrastructure Operational phase: • Maintenance vehicle movements • Localised compaction around infrastructure These activities result in: • Surface and subsoil compaction • Mixing of soil horizons • Disruption of natural drainage • Potential mobilisation of contaminants	These potential impacts, and the resultant effects, are all considered in Section 15.8 of **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. Compaction extending to the subsoil layers is very unlikely, as assessed in section 15.8. In the longer-term, during the operational phase, soils are likely to benefit from being rested from intensive arable farming. As set out in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** at 15.8.101 to 15.8.102 with reference to photographs, there will not be a significant increase in run-off rate. Soils will not become compacted.

ID	Theme	Representation	Applicant's Response
		8.5. Long-Term Effects Compaction can extend into subsoil layers and is difficult to remediate. These changes result in: • Reduced pore space • Reduced infiltration • Impaired drainage • Restricted root development Once established, these effects may persist for decades and represent a permanent degradation of soil function.	
SPC-105	Soils and Agriculture Water Environment	8.6 Assessment of Effects The Proposed Development is likely to result in: • High risk of soil compaction due to heavy machinery and repeated trafficking • Degradation of soil structure and function • Increased waterlogging and reduced drainage • Reduced agricultural productivity	The comments are noted. However, as set out in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** there is not likely to be compaction except in localised areas, and these can be ameliorated during construction as set out in Chapter 15 and the **Outline SMP [APP-204].** Impacts on Farm business are addressed in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** which states at paragraph 15.10.1 that, whilst there will be adverse impacts on a number of agricultural businesses overall they will not be significant in EIA terms.

ID	Theme	Representation	Applicant's Response
		Although continued agricultural use (e.g. grazing) is proposed, this represents a reduction from current arable use and a loss of productive capacity. There is also a risk that soil disturbance may mobilise unknown contamination and affect soil quality. 8.7. Interaction with Hydrology Soil condition directly influences hydrological behaviour. Compaction of clay soils: • Reduces permeability • Reduces infiltration • Increases surface runoff At Sites 8a and 8b, this is particularly significant due to: • Existing poor drainage • Sloping topography • Compacted areas may concentrate and redirect surface flows, increasing pressure on drainage systems.	The Applicant refers to its response to SPC-083 regarding 8.7 Interaction with Hydrology.

ID	Theme	Representation	Applicant's Response
		This conflicts with the assumption that runoff can be effectively controlled.	
SPC-106	Soils and Agriculture	8.8. Assessment Limitations The assessment is affected by significant limitations (see also Chapter 5), including: • Limited baseline soil and ground condition data • Uncertainty regarding contamination • No robust assessment of compaction risk • No evidence that soil structure can be restored • Reliance on outline soil management measures The Environmental Statement confirms that ground conditions are not fully understood and that further investigation is deferred to post-consent. As a result, the scale of impacts and the effectiveness of mitigation are not established. 8.9. Limitations of Mitigation Proposed mitigation measures include:	The Applicant has addressed the alleged limitations in its responses to SPC-102 to SPC-105. There is detailed data for all areas except the Cable Route Corridor. Field survey of the soils in respect of the CRC will be undertaken pre-construction to inform the detailed Soil Management Plan, as cable laying is a short-term operation and good management will ensure that soils are restored without loss of quality irrespective of ALC grade. This is secured in the **Outline Soil Resource and Management Plan [APP-204]**.

ID	Theme	Representation	Applicant's Response
		• Soil management plans • Controlled trafficking • Low ground pressure equipment However: • These measures reduce but do not eliminate risk • They do not address deep subsoil compaction • Their effectiveness depends on implementation There is no reliable method to fully restore soil structure once significant damage has occurred.	
SPC-107		8.10 Summary of Effects • Long-term degradation of soil structure • Functional loss of Best and Most Versatile land • Reduced agricultural productivity • Increased surface runoff and flood risk • Potential mobilisation of soil contamination	The SPC objection relates specifically to Sites 8A and 8B, which are mostly of subgrade 3b with two areas of BMV quality. This is considered in the context of all Sites in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**.

ID	Theme	Representation	Applicant's Response
		The proposed development would give rise to significant and interrelated adverse effects on soil function and the water environment, whereby soil compaction and degradation would reduce infiltration capacity, increase surface water runoff, and exacerbate localised flood risk, particularly on sloping land at Site 8a, resulting in a clear conflict with National Policy Statement for Energy (EN-1) in respect of sustainable land use and flood risk management. These effects are considered to be of at least moderate adverse significance, with the potential to be significant in planning terms when taken cumulatively with existing site constraints and the identified limitations in the Applicant's assessment, and should therefore be afforded substantial weight in the decision-making process.	
SPC-108	Soils and Agriculture	8.11 Policy Conflict The Proposed Development conflicts with: • NPPF §§174, 180 and 181 • NPS EN-1 §§4.2.5, 4.3.3 and 5.15.8	The Applicant refers to its response to SPC-102 to SPC-107.

ID	Theme	Representation	Applicant's Response
		The available evidence does not establish that soil resources would be protected or that impacts would be reversible. 8.12 Conclusion Norfolk contains approximately one million acres of agricultural land, forming one of the most productive arable landscapes in England. This high proportion of intensively farmed land reflects the county's significant contribution to national food production. However, agricultural land within Norfolk is increasingly subject to competing pressures, including acquisition for non-agricultural investment purposes, contributing to rising land values and reduced availability for active farming. In this context, the proposed development would result in the loss and fragmentation of agricultural land, contributing to a cumulative erosion of a finite and nationally important resource. Paragraphs within National Policy Statement for Energy (EN-1) recognise the need to consider the effective use of land and the protection of higher quality agricultural soils. The introduction of	

ID	Theme	Representation	Applicant's Response
		extensive solar infrastructure, together with associated haul roads and construction activity, would lead to soil compaction, reducing infiltration capacity and altering natural drainage characteristics. This would not only diminish soil quality and disrupt land management practices, but also increase surface water runoff, particularly on sloping land such as Site 8a, thereby exacerbating erosion and elevating localised flood risk (see Chapter 6: Water Environment and Hydrology). In this context, the development fails to demonstrate that poorer quality land has been prioritised, or that the impacts on agricultural land and associated hydrological processes have been minimised in accordance with national policy. The proposal would also contribute to a wider cumulative trend in which productive farmland is progressively displaced from its primary function, while simultaneously increasing pressure on the local water environment. The proposal therefore gives rise to a clear conflict with the objectives of EN-1	

ID	Theme	Representation	Applicant's Response
		in respect of sustainable land use, soil protection, and flood risk management. Sites 8a and 8b comprise high-quality, sensitive soils that are vulnerable to structural damage. The evidence demonstrates that: • There is a high risk of soil compaction • Soil structure would be degraded • Agricultural productivity would be reduced • Impacts are likely to be long-term or irreversible • Soil degradation would increase runoff and flood risk Baseline conditions are not fully understood, and the assessment relies on post-consent investigation and uncertain mitigation. It cannot be concluded that soil function would be preserved or that impacts would be temporary and reversible. This uncertainty attracts substantial weight and weighs strongly against the	

ID	Theme	Representation	Applicant's Response
		inclusion of Site 8 within the Proposed Development.	
SPC-109	Cultural Heritage	Heritage and Landscape Chapter 9: Cultural Heritage 9.1. Chapter summary This chapter assesses the impact of the Proposed Development on the historic landscape and the setting of the Shotesham Conservation Area, and the importance of preserving the settings of designated and non designated historic buildings. It demonstrates that: • Sites 8a and 8b form part of a historically coherent and sensitive landscape of considerable time depth • The setting of the Conservation Area is integral to its significance • The Proposed Development would disrupt historic field patterns and landscape character • The introduction of solar infrastructure would industrialise the rural setting	**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 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 legislation, policies and guidance. These assessments together present a detailed assessment of the known and potential archaeology within the Site 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]**. The assessment concludes that, with embedded and additional mitigation measures in place, there are no significant (in

ID	Theme	Representation	Applicant's Response
		• Mitigation measures would not address the identified harm • The settings of designated and non-designated historic buildings have not been addressed As a result, the proposal would cause harm to designated heritage assets that has not been avoided or justified. 9.2. Policy and Statutory Context Heritage assets must be considered in accordance with: • Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 • National Planning Policy Framework • NPS EN-1 §5.8 • Section 66(1) of the Planning Listed Building and Conservation Areas Act 1990 Where harm to significance is identified, it must be clearly justified and given appropriate weight in the planning balance.	EIA terms) residual adverse effects, and all residual adverse effects equate 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. **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 legislation and policies including those outlined by the Consultee in 9.2. This assessment presents a detailed assessment of the historical nature of the Site, surrounding area and heritage assets contained therein, and has assessed the contribution of the Site to built heritage assets in the surrounding area, along with potential impacts of the Scheme upon the historic environment. The Applicant disagrees with the Consultee's statement, in that 'the proposal would cause harm to designated heritage assets that has not been avoided or justified'. As noted within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046],** the design of the

ID	Theme	Representation	Applicant's Response
			Scheme has taken cultural heritage receptors into account, with the **Outline OEMP [APP-196]** providing additional details of specific mitigation and enhancement measures. These measures have been established to minimise potentially adverse effects upon the significance of built-heritage assets (including the siting of transportation routes, temporary Construction Compounds, substations and BESS to be unobstructive to the settings of heritage assets, gapping up and reinforcing hedgerows and planting of tree belts, and incorporating setbacks). 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.
SPC-110	Cultural Heritage	8.3. Baseline and Setting Sites 8a and 8b lie within the setting of the Shotesham Conservation Area and form part of a well-preserved historic agricultural landscape. Shotesham sits within a well-preserved area of 'ancient countryside',	The Applicant notes that Site 8 form parts of the wider agricultural landscape of Shotesham Conservation Area; however, as the conservation area lies c. 650m north of Sub-Site 8B, it is not considered to contribute to its immediate setting. As noted within **ES Volume 3, Appendix 10.2 – Archaeological Desk-Based**

ID	Theme	Representation	Applicant's Response
		characterised by small villages, isolated farms, ancient woodland, winding lanes, and species-rich hedgerows, reflecting centuries of agricultural use. Situated on the south Norfolk clays, the area escaped post-WWII hedgerow removal, retaining historic field boundaries and ancient woodlands at Shotesham Great and Little Woods and Ringers Grove. The village and surrounding farms likely originated as subsidiary settlements to the Roman regional capital of Venta Icenorum (Caister St Edmunds), with the name 'Scott's farmstead' dating from 650–850. The medieval landscape featured open-strip arable fields with pockets of common and woodland, leaving distinctive evidence in sinuous hedgerows laid during sixteenth- and seventeenth-century enclosure.	**Assessment [AS-020 – AS-021],** the landscape around Shotesham has retained remnants of an earlier medieval and post-medieval agricultural landscape, largely in the forms of sinuous boundaries; however, there has been considerable loss of field boundaries within the wider landscape since the late-19th century, though these now larger fields do retain the characteristic medieval/post-medieval sinuous boundaries. Within Site 8 itself, it is noted that the majority of the fields have been classified as 20th century agricultural fields, which hold little historic significance. Small areas within Site are further classified as remnant 18th-19th century field pattern, which is of greater historic interest; however, Solar PV Panels have been removed from two of the three fields identified as remnant 18th-19th field pattern, with a significant amount of the remaining field within Sub-Site 8A also classified as a development exclusion area. Although there will 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

ID	Theme	Representation	Applicant's Response
			patterns, nor the historic landscape character of the area as a whole. While it is accepted that footpaths in general contribute to the overall historic landscape character of an area, the assessment has not identified any footpaths within or surrounding Site 8 which have any particular heritage value of equivalence to a non-designated heritage assets. Views from footpaths, including those of heritage assets, have been assessed in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and mitigated where potential impacts were identified.
SPC-111	Cultural Heritage	Of particular significance is the framework of roads and fields structuring the modern landscape. Around Shotesham and Saxlingham, parallel roads, footpaths, and field boundaries run northwest–southeast from the River Tas to higher ground near Fylands Farm, forming a 'co-axial field system'. These alignments originate in the late prehistoric or Roman period, with droves such as Wash Lane linking valley resources to upland pastures. The system at Shotesham is uniquely well-preserved, allowing appreciation of the	No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage asset. Views from footpaths, including those of heritage assets, have been assessed in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and mitigated where potential impacts were identified. The Applicant refers to its response to SPC-110 regarding historic landscape. Comments regarding historic landscape have been addressed in the Applicant's response to SPC-110.

ID	Theme	Representation	Applicant's Response
		long-term historic layering of the landscape. Figure 9.3a: Co-axial field system around Shotesham. Parallel roads, footpaths, and field boundaries reflect centuries of human activity, particularly around King's and Lathegreen Farms and Thetford Farmhouse, illustrating routes linking the river valley and neighbouring uplands from the late prehistoric or Roman period.	
SPC-112	Cultural Heritage Landscape and Visual	This landscape provides: • Openness and rural character • Visual and spatial context to the settlement • Continuity with historic land use The surrounding countryside is integral to how the Conservation Area is experienced and understood. It is not only important to the historic setting of the Conservation Area but also forms an important part of community life. Local residents actively engage with the landscape through wildlife recording, conservation activities, and recreational use of the extensive network of public rights of way. Community-led initiatives,	The Applicant notes that Site 8 forms part of the wider agricultural landscape of Shotesham Conservation Area; however, as the conservation area lies c. 650m north of Sub-Site 8B, it is not considered to contribute to its immediate setting. The Applicant notes that the *Shotesham Conservation Area Character Appraisal and Management Guidelines* (SNC 2018) make limited references to the surrounding countryside, including *'Norwich Road, divides the landscape into two distinct parts. To the east is mainly open country, with fine views over the Shotesham valley; the west is Shotesham Park, an open parkland dotted with trees, enclosed with dense belts of woodland and centred on the great house itself.'* While Site 8 forms part of the wider

ID	Theme	Representation	Applicant's Response
		including wildlife surveys, conservation projects and locally produced walking guides, demonstrate the strong relationship between the village and its surrounding countryside. Figure 9.3b and c – show images of Shotesham All Saints wildlife survey and book of walks Figure 9.3d – shows an image of the Shotesham All Saint's website. Evidencing clear links to the village and the environment around it.	countryside, the document makes no specific reference to the area of Site 8, which lies to the south/south-east of Shotesham Conservation Area. The Conservation Area Character Appraisal and Management Guidelines identifies a series of 'key views' both too and from the conservation area (SNC 2018, 24); however, none of these key views include Site 8 within their vistas, and it is considered that the Scheme would not have any impact upon the identified views. The Applicant has noted Figure 9.3b-d as provided by the Consultee, which show the covers of the Shotesham Wildlife Survey and Shotesham Circular Walks, as well as an image of the Shotesham Village website.[2] 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 - Residential Visual Amenity Assessment [APP-148]**.

[2] http://www.shotesham.com/.

ID	Theme	Representation	Applicant's Response
SPC-113	Cultural Heritage Landscape and Visual	9.4. Contribution of Setting to Significance The significance of the Conservation Area is closely tied to its agricultural setting. The surrounding landscape: • Provides a rural foreground and backdrop • Maintains historic relationships between settlement and land use • Preserves the legibility of historic development patterns Sites 8a and 8b contribute directly through: • Open agricultural character • Visual continuity • Key views from roads and public rights of way Figure 9.4a shows the proximity of Site 8 to the main village and to the Grade 11 listed Upgate Farm and its associated buildings which are also listed. Figure 9.4b – Shows an image of Upgate Farm	The Applicant notes that the *Shotesham Conservation Area Character Appraisal and Management Guidelines* (SNC 2018) make limited references to the surrounding countryside, including *'Norwich Road, divides the landscape into two distinct parts. To the east is mainly open country, with fine views over the Shotesham valley; the west is Shotesham Park, an open parkland dotted with trees, enclosed with dense belts of woodland and centred on the great house itself.' W*hile Site 8 forms part of the wider countryside, the document makes no specific reference to the area of Site 8, which lies to the south/south-east of Shotesham Conservation Area. The Conservation Area Character Appraisal and Management Guidelines also identifies a series of 'key views' both too and from the conservation area (SNC 2018, 24); however, none of these key views include Site 8 within their vistas. **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** addresses potential direct impacts to historic landscape character. The historic landscape character within the majority of Site 8 have been classified as 20th century agricultural fields, which hold

ID	Theme	Representation	Applicant's Response
		Figure 9.4c - The Interconnected Historic Character of Shotesham Village and its Agricultural Setting Traditional buildings within the Shotesham Conservation Area. The significance of the conservation area derives not only from individual heritage assets but also from their relationship with the surrounding agricultural landscape, historic lanes, public rights of way and open countryside.	little significance. One field within Sub-Site 8B and two fields within Sub-Site 8A appear to be remnants of 18th-19th century field pattern, which is of greater interest. Historic landscape character has also been addressed within **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. The Applicant recognises that the Scheme would result in an effects on the local landscape character of Site 8. These effects are 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**

ID	Theme	Representation	Applicant's Response
			1, Chapter 5 - Reasonable Alternatives and Design Evolution [APP-041]. The Applicant notes that potential impacts to the Grade II Listed Upgate Green Farmhouse (NHLE 1050681) and Outhouse Immediately to North of Upgate Green Farmhouse (NHLE 1304804) 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 – APP-168].** 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 will be enhanced under the landscape proposals of the Scheme to offer further screening. The assessments have acknowledged that the wider agricultural setting of the Farmhouse highlights its rural nature and intentional design; however, with the proposed mitigation, the assessment has concluded that overall significance of this designated heritage asset will not be harmed by the Scheme. No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage

ID	Theme	Representation	Applicant's Response
			asset. Views from footpaths, including those of heritage assets, have been assessed in **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]** and mitigated where potential impacts were identified. It should be noted that apart from a footpath near Shotesham House, east of The Street, no reference is made within the Conservation Area Character Appraisal and Management Guidelines regarding historic lanes or public rights of way within the conservation area or the wider landscape.
SPC-114	Cultural Heritage Landscape and Visual	9.5. Historic Landscape Character The historic landscape character of Shotesham derives from the survival of a highly legible agricultural landscape containing evidence of multiple periods of human activity, including prehistoric and Romano-British co-axial field systems, medieval enclosure patterns, historic routeways and drove roads, and long-established field boundaries and hedgerows. The landscape retains a strong relationship with the Shotesham Conservation Area and surrounding historic buildings, helping to preserve their rural setting and historic context.	The Applicant does not agree with the Consultee, that the archaeological remains within Site 8 contribute to the character and appearance of Shotesham Conservation Area. Both **ES Volume 3, Appendix 10.2 – Archaeological Desk-Based Assessment [AS-020 – AS-021]** and **ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey [AS-022]** identified the low – moderate potential for archaeological remains dating to the prehistoric – medieval periods within Site 8. Further works, in the form of evaluation trenching, as documented within **ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172]**, did not identify any significant remains within the study site, with the works revealing post-

ID	Theme	Representation	Applicant's Response
		Collectively, these features create a landscape of considerable evidential value and historical coherence, with the co-axial field system forming a key element of its significance.	medieval remains relating to field systems which were removed by 1988 (e.g. field boundaries and ditches). No evidence of prehistoric or Romano-British co-axial field systems have been identified within Site 8. While it is acknowledged that the Scheme will result in a 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.
SPC-115	Cultural Heritage Landscape and Visual	9.6. Assessment of Effects The Proposed Development would introduce: • Solar arrays • Security fencing • Associated infrastructure This would result in: • Industrialisation of the rural setting • Enclosure of open countryside • Loss or filtering of long-distance views	A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Assuming this comment is associated with Site 8, Perimeter fencing for the Solar PV Arrays will be a deer fence consisting of wire mesh and wooden or metal posts, at a maximum height of 2.5m, as set out in **ES Volume 1, Chapter 4 – The Scheme [APP-040]** and secured through the **Design Principles, Parameters and Commitments [APP-213]**. The fencing types are secured through the **Design Principles, Parameters and Commitments [APP-213]**, which is itself

ID	Theme	Representation	Applicant's Response
		• Erosion of tranquillity and rural character The character of the site would change from agricultural to industrial. 9.7. Impact on Historic Landscape The development would affect the integrity of the historic landscape through: • Ground disturbance • Loss or fragmentation of field boundaries • Disruption of co-axial field systems • Interruption of historic routeways This would result in: • Loss of evidential value • Reduction in time depth • Fragmentation of a coherent historic landscape 9.8. Archaeological Context The wider area demonstrates evidence of long-term occupation and landscape evolution. While limited remains are recorded within the site, the surrounding landscape:	secured by Requirement 5 in the **Draft DCO [AS-032]**. 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 and reduce the perception of the Scheme within the landscape. 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 some change to the landscape character and views. However, The historic landscape character within the majority of Site 8 have been classified as 20th century agricultural fields, which hold little significance. One field within Sub-Site 8B

ID	Theme	Representation	Applicant's Response
		• Has high archaeological potential • Contributes to understanding of historic land use Ground disturbance therefore carries a risk of affecting previously unidentified remains.	and two fields within Sub-Site 8A appear to be remnants of 18th-19th century field pattern, which is of greater interest. The Applicant has reduced solar development in Sub-Site 8B, to reduce the impact on landscape setting on cultural heritage asset, No historic paths have been identified as having any particular heritage value of equivalence to a non-designated heritage asset. Finally, the archaeological works to-date have no identified any significant archaeological remains within Site 8, with the only identified assets being related to post-medieval field systems, which were removed by the late-20th century. While it is acknowledged that the Scheme will result in a 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. It is therefore 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

ID	Theme	Representation	Applicant's Response
			benefits and the needs case (as set out within the **Statement of Need [APP-206]**. The Applicant notes that the works detailed in **ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [APP-172]** has primarily targeted areas where the geophysical survey (as presented in **ES Volume 3, Appendix 10.3 – Archaeological Geophysical Survey Report [AS-022]**) has identified archaeological potential, in addition to anomalies identified through aerial photography (as presented in **ES Volume 3, Appendix 10.4 – Aerial Investigation Mapping Survey [AS-023** and **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** and **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 identify 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**

ID	Theme	Representation	Applicant's Response
			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 NHES that the amount and location of any additional trenching will be targeted on areas of higher impact, and will be proportionate to the cumulative impact of all elements of the scheme. In areas of known extensive impacts (e.g. BESS, Substation, working compounds), they will be subject to informative trenching at 3.5% by area. Within areas of known archaeological sensitivity, as identified thus far in **ES Volume 3, Appendix 10.6 – Archaeological Mitigation Strategy [APP-173]**, mitigation will be carried out, the extent and form of which will be balanced against the impact of the finalised detailed development plans. Detailed Project Designs will be supplied to NCCHES prior to approval for each stage of archaeological mitigation, once the full development plans are known.
SPC-116	Cultural Heritage	9.9. Assessment Limitations The heritage assessment is affected by limitations (see also Chapter 5), including:	**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-**

ID	Theme	Representation	Applicant's Response
	Landscape and Visual	• Geophysical surveys based on earlier site boundaries • Partial archaeological investigation • Limited assessment of setting impacts • The assessment relies on mitigation measures and does not fully address the fundamental change in landscape character. As a result, the extent of harm is likely to be underestimated. 9.10. Limitations of Mitigation Proposed mitigation measures, including planting, would not address the identified harm because: • They would not restore historic field patterns • They would introduce additional non-historic elements • They would take many years to establish • They would not reinstate openness • They would significantly alter the open and scenic nature of the land	**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].** The Applicant considers that these assessments have been undertaken in accordance with the appropriate legislation, policy and guidance. These assessments together present a detailed worst case assessment of the known and potential archaeology within the Site and has assessed the potential impact of the Scheme on archaeological assets. 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 undertaken within the remaining areas of the Scheme, which includes further informative trenching, as well as the continuation of geophysical survey. 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. Should the Scheme Designs show areas of potential impacts of known

ID	Theme	Representation	Applicant's Response
		• They would provide no effective mitigation due to the topography of the land The harm arises from the presence and scale of development, not from visibility alone.	archaeological remains, as outlined within the Archaeological Mitigation Strategy, excavation or preservation in situ will be considered, in agreement with NCCHES. **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. The methodology and scope of the Heritage Statement was agreed with Statutory Consultees. An assessment of historic landscape character has also been provided within **ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]**. 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 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

ID	Theme	Representation	Applicant's Response
			design evolution of the Scheme in respect of landscape and visual context is set out in the **Design Approach Document [APP-212]**. This includes consideration of topography with elevated and rising landforms avoided from development. At Site 8B this approach is evident where solar development has been excluded on rising landform to the north and west with landscape measures proposed to reinforce existing tree features (as defined on the **Green Infrastructure Strategy [AS-005])** and screen the remaining part of the Site which is proposed for solar development. Collectively the approach and measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects, and landscape and visual considerations are embedded into the design principles and design evolution of siting infrastructure. 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 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**

ID	Theme	Representation	Applicant's Response
			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.
SPC-117	Cultural Heritage Landscape and Visual	9.11 Summary of Effects • Harm to the setting of the Conservation Area • Industrialisation of a historic agricultural landscape • Fragmentation of historic field patterns • Loss of openness and rural character • Reduction in evidential and cultural value • Harm the settings of designated and non-designated buildings 9.12 Policy Conflict The Proposed Development conflicts with:	**ES Volume 1, Chapter 10 – Cultural Heritage [APP-046]** and its Appendices **[AS-020 – AS-021], [AS-022], [AS-023 – AS-024],** and **[APP-172]** have been undertaken in accordance with the appropriate legislation, policies and guidance, including Sections 66 and 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990, the National Planning Policy Framework, and National Policy Statements NE-1, EN-3 and EN-5. Effects on Cultural Heritage, as bulleted by the Consultee, have been detailed in SPC-109 – SPC-116. Effects on Landscape have been responded to in SPC-116.

ID	Theme	Representation	Applicant's Response
		• Section 72 duty to preserve or enhance Conservation Areas • National Planning Policy Framework • NPS EN-1 §5.8 The identified harm has not been avoided or justified.	
SPC-118	Cultural Heritage Landscape and Visual	9.13 Conclusion Sites 8a and 8b form part of a well-preserved historic landscape that contributes to the setting and significance of the Shotesham Conservation Area. The evidence demonstrates that: • Industrial infrastructure would be introduced into a historic agricultural landscape • Open countryside would be enclosed and landscape character altered • Historic field systems and relationships would be disrupted • The rural setting of the Conservation Area would be eroded • Designated and non-designated historic buildings and their settings	Effects on Cultural Heritage have been detailed in SPC-109 – SPC-116. Effects on Landscape have been responded to in SPC-116.

ID	Theme	Representation	Applicant's Response
		would be significantly altered and harmed The identified harm is not avoided, not mitigated, and not justified. It should therefore be afforded considerable weight in the planning balance and weighs strongly against the inclusion of Sites 8a and 8b within the Proposed Development.	
SPC-119	Landscape and Visual	Chapter 10: Landscape and Visual 10.1. Chapter Summary This chapter assesses the effects of the Proposed Development on landscape character and visual amenity at Sites 8a and 8b. It demonstrates that: • The site lies within a landscape of high value, high susceptibility, and high sensitivity (as identified by the Applicants own assessment) • The landscape has limited capacity to accommodate large-scale development	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 visual amenity of residential properties in **ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148]**. The Applicant concludes a range of significant landscape and visual effects during construction these short-term and reversible, resulting from increased activity, vehicle movements, temporary compounds, hedgerow loss, trenching, and temporary PRoW closures.

ID	Theme	Representation	Applicant's Response
		• Industrial-scale solar infrastructure would be introduced into a rural landscape • Significant adverse effects on landscape character and visual amenity are identified by the Applicant's own assessment • Effects are widespread, long-term, and persist beyond Year 15 • Mitigation measures would not effectively reduce or offset the harm As a result, the development would result in substantial and unavoidable landscape and visual harm. This chapter sits alongside the report completed and submitted to the Planning Inspectorate by [Redacted] CMLI. CLASSIC LANDSCAPE ARCHITECTURE LTD –Reference: Landscape and Visual Matters CLA/330/25/01	During the operational phase long-term significant effects occur as a result of the transition from an agricultural to energy production landscape, with direct loss of features and increased influences from infrastructure. Solar panels alter land cover and affect perceptions of remoteness and tranquillity. However, the Applicant considers that the **Green Infrastructure Strategy [AS-005**] provides a wide range of proposed landscape and ecological measures, which have been included to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme. The Applicant considers that the Scheme includes a range of reasonable and achievable mitigation measures such as exclusion of development, the use of appropriate setbacks, sensitive siting of built elements, and the retention of existing vegetation to mitigate identified effects. Where appropriate introduction of new landscape measures to support landscape integrating and visual screening of the Scheme is also included. By Year 15, mitigation planting establishes, reducing effects and enhancing integration. Most landscape and visual receptors experience decreased effects, albeit some remain

ID	Theme	Representation	Applicant's Response
			significant as a result of the long-term presence of new infrastructure. At Site 8B this approach is evident where solar development has been excluded on rising landform to the north and west with landscape measures proposed to reinforce existing tree features and screen the remaining part of the Site which is proposed for solar development. Collectively the approach and measures are designed to integrate the Scheme into the surrounding context and reduce adverse effects, and landscape and visual considerations are 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]**. 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]**.

ID	Theme	Representation	Applicant's Response
			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.
SPC-120	Landscape and Visual	10.2. Policy Context Landscape and visual effects must comply with: • NPS EN-1 §5.10 (including cumulative effects) • National Planning Policy Framework (protection of intrinsic character and beauty of the countryside) Valued landscapes are protected irrespective of formal designation. Significant adverse effects must be afforded substantial weight. 10.3. Baseline and Landscape Sensitivity Sites 8a and 8b lie within the Tas Valley countryside surrounding Shotesham. Key characteristics:	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 notes the policy context. The Applicant considers that the Landscape and Visual Assessment presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has been undertaken in accordance with the appropriate guidelines it has informed the iterative design process and is robust and appropriate for the assessment of the Scheme. The Applicant notes the landscape sensitivity of Site 8. Detail of the landscape baseline is presented in **ES Volume 3: Appendix 7.2 – Landscape Baseline [APP-119]** which

ID	Theme	Representation	Applicant's Response
		• Intact historic field patterns with strong time depth • Well-defined hedgerows and field boundaries • Open, expansive views across gently undulating land • High levels of tranquillity with limited modern intrusion The Applicant's assessment identifies the site as: • High landscape value • Highly susceptible to change • Of high overall sensitivity It lies within A1 Tas Rural River Valley and B1 Tas Tributary Farmland, both with limited capacity for solar development. The landscape also supports recreational use, including the Boudicca Way, and contributes to the setting of the Shotesham Conservation Area.	provides descriptions of the baseline characteristics and features of all relevant district landscape character areas and of individual Sites. These have therefore been considered in the assessment of effects. 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.
SPC-121	Landscape and Visual	10.4. Visual Envelope and Receptors The site is widely visible from:	Market Lane Farm and Dawson's Farm have been addressed in SPC-043.

ID	Theme	Representation	Applicant's Response
		• Public Rights of Way (Footpaths 19 and 22, Boudicca Way) • Local roads (Brooke Road, Baxter's Lane, Market Lane, Wash Lane) • Residential properties, including Market Lane Farm and Dawson's Farm (~20m from Site 8b), Golden Owl Barn, Kings Farm, Wodehouse, The Copse, Hill View and Ley Farm (all within 150 m from site 8b) • Elevated viewpoints across the Tas Valley • Golden Owl Barn overlooks the entirety of site 8a • Solar panels proposed on site 8B will run parallel with footpath 22, will be highly visible from Brooke Road and Baxter's Lane. This is recognised by the Applicant in Fig 7.6.8 (visualisation of site 8) Figure 10.4a – Shows the how the undulating nature of Site 8 means that a massive theoretical zone of visibility is created around it. Receptor sensitivity is high, particularly for residents and recreational users. The	The theoretical visibility of Site 8 is presented in **ES Volume 2, Figure 7.5.4 - Site 8 Zone of Theoretical Visibility [APP-073]**. The Applicant acknowledges that the Scheme would result in effects for a number of visual receptors. However, the Applicant does not agree that the receptors identified by the Respondent would experience "widely visible" views of Site 8. The ZTV demonstrates that the valley landform within which Site 8 is situated influences visibility and limits views to within the valley. Woodland blocks presented in the area further limits the visibility. Potential landscape and visual effects are assessed in **ES Volume 1, Chapter 7: Landscape and Visual [APP-043]** and detailed in **ES Volume 3, Appendix 7.7: Visual Assessment Tables [APP-147]**. The visual amenity of Public Rights of Way is further assessed within **ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [APP-149]**, while effects on residential properties are assessed within **ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [APP-148]**.

ID	Theme	Representation	Applicant's Response
		wide visual envelope amplifies the significance and extent of effects.	Shotesham Footpaths 19 and 22 are located adjacent to the Scheme and, as such, visual effects are anticipated and have been assessed accordingly. Through the design evolution process, solar infrastructure has been removed from the northern and north-western parcels of Sub-Site 8B. The evolution of the Scheme in response to landscape and visual considerations is set out within 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. As a result, visibility from Boudicca Way (VL5/Site8), Market Lane (VL4/Site8) and Wash Lane (VL2/Site8) have been reduced for those reported at statutory consultation. Levels of significance of effect as a result of proposed mitigation planting as follows: • Boudicca Way (VL5/Site8) reduces from a Major adverse significant effect at construction to a Minor adverse not significant effect at year 15;

ID	Theme	Representation	Applicant's Response
			• Market Lane (VL4/Site8) reduces from a Major adverse significant effect at construction to a Negligible adverse not significant effect at year 15; and • Wash Lane (VL2/Site8) reduces from a Moderate adverse significant effect at construction to a Minor adverse not significant effect at year 15. Kings Farm, Golden Owl Barn, Wodehouse, The Copse, Hill View and Ley Farm form a cluster of residential properties along Baxter's Lane. Representative View location VL11/Site8 was selected to assess views from this residential cluster. The assessment concludes that the Scheme would result in a Major to Substantial Significant Adverse effect during the construction phase. During operation, this reduces to a Major Significant Adverse effect in Year 1 and a Moderate Significant Adverse effect by Year 15 as mitigation planting establishes and matures (as defined above). These effects are reported in the ES and demonstrate that the assessment has fully recognised the high sensitivity of these residential receptors and the changing nature of effects over time.

ID	Theme	Representation	Applicant's Response
			While residents and recreational users are considered to be receptors of high sensitivity, the significance of visual effects is not determined by sensitivity alone. It also reflects the scale, extent, duration and nature of the change experienced. These factors have been comprehensively assessed within the ES and informed the conclusions presented therein.
SPC-122	Landscape and Visual	10.5. Assessment of Effects The Proposed Development would introduce: • Extensive solar arrays of uniform, engineered form • Security fencing, access tracks, and ancillary infrastructure This would result in: • Loss of openness and enclosure of the landscape • Industrialisation of the rural setting • Disruption of historic field patterns and fine-grained landscape character	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 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

ID	Theme	Representation	Applicant's Response
		The scale and form of development are at odds with the existing rural and historic landscape. 10.6. Findings of the LVIA The Applicant's own LVIA identifies: • Significant adverse effects on landscape character • Significant visual effects at multiple receptors • Effects persisting beyond Year 15 Moderate adverse effects under the Applicant's methodology constitute significant effects. These findings confirm the effects are widespread, long-term, and unavoidable.	(infill planting/laying coppicing) and new tree and woodland planting. Such measures would provide visual screening and landscape integration and provide reasonable achievable mitigation which reduces environmental effects overtime. 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, operation and decommissioning are secured in the **Outline CEMP [APP-196], Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**, respectively via the **Draft DCO [AS-032]**. There are various other control mechanisms which address the concerns raised by SPC, for example Requirement 10 (Fencing and other means of enclosure) which controls the placement of temporary and permanent fencing.
SPC-123	Landscape and Visual	10.7. Assessment Limitations The LVIA is affected by: • Constrained study area	The Applicant does not agree that the LVIA is materially affected by the limitations identified. Detail of landscape methodology is presented in **ES Volume 3, Appendix 7.1 -**

ID	Theme	Representation	Applicant's Response
		• ZTV used as a limiting rather than analytical tool • Limited cumulative effects assessment • Assumption of effective embedded mitigation • Sensitivity inconsistently applied in conclusions Residential Visual Amenity assessment lacks clarity: • Receptor identification and mapping are incomplete • Dawson's Farm on Wash Lane, Owl Barn on Baxter's Lane and other worst-case receptors are not fully considered Mitigation measures, including structural planting and hedgerow reinforcement, are limited: • Require many years to establish • Only provide partial and seasonal screening • Cannot restore openness or historic landscape character	**Landscape and Visual Methodology [APP-118]**. The Applicant considered the Study Area to be proportionate and robust. The Study Area has been informed through a combination of professional experience by consultation with the relevant bodies, a review of a search area extending to a 5km radius from each of the individual Sites, a walkover of the Order Limits undertaken in 2024 and further detailed survey in 2025. Consideration of the potential visibility of the components of the Scheme has also been informed by Zone of Theoretical Visibility (ZTV) Analysis as presented on **ES Volume 2, Figure 7.5.1 - Zone of Theoretical Visibility with View Locations [APP-070] to ES Volume 2, Figure 7.5.10 - Zone of Theoretical Visibility with View Locations [APP-079]**. The ZTV analysis formed one component of the assessment process and was used to inform the identification of potentially affected receptors, view location selection and the extent of field survey. The LVIA did not rely solely on the ZTV.

ID	Theme	Representation	Applicant's Response
			The Landscape Cumulative Assessment is presented in **ES Volume 1, Chapter 7: Landscape and Visual [APP-043]**. The cumulative assessment has been undertaken in accordance with relevant guidance and considers those developments identified as having potential for cumulative landscape and visual effects. Landscape sensitivity has been assessed in accordance with the LVIA methodology presented in **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]** and GLVIA3, taking account of both the value of the landscape and its susceptibility to the type of development proposed. Issues relating to the RVAA and residential receptors have been addressed in SPC-043 and SPC-121. RVAA figures are presented in **ES Volume 2, Figure 7.9 Residential Receptors Plan [APP-084]**. Dawson's Farm is identified as receptor 8-1, and Owl Barn on Baxter's Lane is located beyond 100m from the maximum scheme parameters so has not been assessed. Regardless of the consideration within the RVAA these receptors have been considered and informed the design approach and the

ID	Theme	Representation	Applicant's Response
			mitigation strategy. 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 Applicant notes that mitigation requires time to establish and effectiveness varies dependent on season. Some of the mitigation planting will reduce the perceive openness of some landscape character. These effects had been assessed in **ES Volume 1, Chapter 7, Landscape and Visual [APP-043]**. 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]**.
SPC-124	Landscape and Visual	Residential Visual Amenity – Assessment Limitations	The Applicant does not agree that the assessment relies on a limited number of representative receptors without sufficient

ID	Theme	Representation	Applicant's Response
		The Applicant's Residential Visual Amenity Assessment does not provide sufficient clarity or transparency in the identification and selection of residential receptors. No plans are provided to clearly show the location of assessed properties relative to the Proposed Development, making it difficult to verify whether the most affected receptors have been included. In the case of Sites 8A and 8B, Market Lane Farm is located approximately 20 metres from the boundary of Site 8B and represents one of the closest and most sensitive residential receptors. However, it is not clearly identified within the assessment, and there is no evidence to demonstrate that its effects have been explicitly assessed. In addition, part of the hedge line of the property is likely to be removed to support vehicle visibility on Market Lane Farm, this would further impact on the visibility of construction traffic and the final scheme. Dawson's Farm on Wash Lane is also less than 20m away from Site 8a, and has a cable corridor going through the grounds of the property.	justification. The selected viewpoints were chosen to represent a range of receptor locations, viewing directions, distances and levels of visibility, including those anticipated to experience the greatest degree of change. Issue on individual residential receptors addressed in SPC-043 and SPC-121. RVAA figures are presented in **ES Volume 2, Figure 7.9 - Residential Receptors Plan [APP-084]**. Residential Visual Amenity Assessment (RVAA), as presented in **ES Volume 2, Appendix 7.8 - Residential Visual Amenity 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

ID	Theme	Representation	Applicant's Response
		Owl Barn on Baxter's Lane has open and wide-ranging views of Site 8A, and has not been considered. In addition, it is very close to the proposed cable route corridor into Site 8b. Figure 10.7x – shows image of Owl Barn and its views across Site 8a The assessment relies on a limited number of representative receptors selected through professional judgement, without sufficient justification for the inclusion or exclusion of specific properties. As a result, there is a clear risk that the worst-case scenario has not been assessed. At such proximity, the Proposed Development would result in a substantial and immediate change to outlook, with potential effects approaching or exceeding recognised Residential Visual Amenity thresholds. Accordingly, the absence of clear receptor mapping and the lack of evidence that the nearest properties have been assessed undermine the robustness of the conclusions. The findings of the Residential Visual Amenity	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 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. The Applicant acknowledges that some nearby residents would experience noticeable changes in views as a result of the Scheme and that significant visual effects may occur at certain properties. The Applicant disagrees that the properties excluded from the RVAA study area would likely to meet RVAA Thresholds. As the purpose of an RVAA is not to identify all properties from which the Scheme may be

ID	Theme	Representation	Applicant's Response
		Assessment should therefore be afforded limited weight.	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.
SPC-125	Landscape and Visual	10.8. Summary of Effects • Industrialisation of a rural landscape • Enclosure of open countryside • Disruption of historic field patterns • Loss and filtering of long-distance views • Reduction in tranquillity and rural character • Significant visual effects across multiple receptors 10.9. Policy Conflict The Proposed Development conflicts with: • NPS EN-1 §5.10 • National Planning Policy Framework	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. Landscape and visual effects as a result of the Scheme, are presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043].** The Assessment of Likely Effects is presented in section 7.8. The Applicant does not agree that the Scheme would result in industrialisation of a rural landscape. While the Scheme would introduce solar infrastructure into a predominantly agricultural landscape, the Site

ID	Theme	Representation	Applicant's Response
		The identified harm: • Has not been avoided • Cannot be effectively mitigated • Has been underestimated	would remain largely undeveloped in character, with the vast majority of land retained as open grassland and available for continued agricultural management, including grazing. Unlike conventional industrial development, the solar arrays are low in height, non-permanent, and do not involve extensive built form, large buildings, or significant areas of hardstanding. 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,

ID	Theme	Representation	Applicant's Response
			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 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 does not agree that landscape effect has not been avoided, effectively mitigated or has been underestimated. As defined in **ES Volume 3, Appendix 1.2 – Statement of Expertise [APP-112],** the 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

ID	Theme	Representation	Applicant's Response
			relevant stakeholders and are fully reported in ES Chapter 7 and supporting appendices. 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. 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]**.
SPC-126	Landscape and Visual	10.10. Conclusion Sites 8a and 8b lie within a highly sensitive landscape of high value and limited capacity to accommodate change. The Proposed Development would:	The Applicant acknowledges that there will be some significant landscape and visual effect as a result of the Scheme, as presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**.

ID	Theme	Representation	Applicant's Response
		• Fundamentally alter landscape character • Result in significant, long-term, and widely experienced visual effects • Introduce industrial infrastructure into a valued rural setting • Fail to be effectively mitigated The resulting landscape and visual harm is inherent, substantial, and unavoidable. It should therefore be afforded substantial weight in the planning balance and weighs decisively against the inclusion of Sites 8a and 8b within the Proposed Development.	However, the Applicant does not agree with the assertion that the Scheme would fundamentally alter landscape character, nor that the resulting landscape and visual effects are substantial and unavoidable. The LVIA identifies major adverse significant effects on landscape character for Site 8 during the construction phase and in Year 1 of operation. These effects are predicted to reduce to moderate adverse significant effects by Year 15, reflecting the establishment of the landscape measures set out in the **Green Infrastructure Strategy [AS-005].** No residual landscape effects are recorded as substantial. Similarly, for visual receptor VL11/Site8, the assessment identifies a major to substantial adverse significant effect during the construction phase. This effect reduces to major adverse in Year 1 of operation and further reduces to moderate adverse by Year 15 as landscape mitigation matures and the Scheme becomes more integrated within the surrounding landscape. The Applicant acknowledges that significant visual effects would be experienced from

ID	Theme	Representation	Applicant's Response
			some locations, particularly in close proximity to the Site. However, visibility is moderated by existing vegetation, landform and settlement pattern. The embedded landscape strategy, including retention of existing landscape features, strengthening of hedgerows and substantial new planting, would further reduce visual effects over time and assist in integrating the development into the surrounding landscape framework. The Applicants position on the industrialisation of the landscape is provided in SPC-125. The Applicant also does not agree that the identified effects are incapable of mitigation. The LVIA demonstrates that the embedded mitigation measures would reduce the extent and level of effects as planting establishes and matures. Whilst some residual adverse effects would remain, this is reflected in the assessment conclusions. 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

ID	Theme	Representation	Applicant's Response
			residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case.
SPC-127	Public Rights of Way	People and amenity 11. Public Rights of Way 11.1 Chapter Summary This chapter assesses the effects of the Proposed Development on Public Rights of Way (PRoW) within and around Sites 8a and 8b. It demonstrates that: • Public Rights of Way form a highly sensitive recreational resource • The Proposed Development would introduce enclosure and industrialisation into an open rural landscape • User experience, amenity, and perceived safety would be significantly degraded • Effects would be sustained along routes, particularly the Boudicca Way	The Applicant considers that the assessment and design approach to PRoW is robust and these have been appropriately considered as a recreational resource. The design of the Scheme has been informed by an environmentally led approach, which has considered PRoW in the design and 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]**. The Schemes 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 measures to reduce effects upon the PRoW network, with a minimum of 15m buffer from the receptor to the solar development included. Site-specific environmental conditions informed by surveys and the environmental impact assessment process have also resulted in exclusion of

ID	Theme	Representation	Applicant's Response
		• The assessment fails to properly consider experiential and cumulative effects As a result, the proposal would give rise to significant adverse impacts on recreational amenity that have not been adequately assessed. 11.2. Policy Context Development affecting Public Rights of Way and recreational receptors must consider: • NPS EN-1 §5.12 (amenity, health, and quality of life) • National Planning Policy Framework (support for public access and protection of the natural environment) The quality of user experience is a material consideration, not just the retention of physical access.	development from certain locations to further reduce effects on the PRoW network, such as at Site 7E and 7F. In addition, the Applicant considers that the **Green Infrastructure Strategy [AS-005]** provides a wide range of proposed landscape and ecological measures alongside the retention of existing vegetation, to reduce adverse effects on the landscape and its features and reduce the visibility of the Scheme. This considers the users experience and amenity (audible and visual qualities) of the PRoW network. Furthermore, as a result of a considered design approach and offsets from the PRoW network specific sound levels on PRoWs will be designed to be below 50 dBA where practicable and not exceed 55 dBA as defined in the **Outline OEMP [APP-197]**. The Applicant considers that PRoW have been considered throughout the assessment process. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** which considers PRoW as a component of the landscape with recreational value and also as sensitive visual receptors with representative view locations located on the

ID	Theme	Representation	Applicant's Response
			PRoW network within the Order Limits and Study Area. The LVIA also includes a Public Right of Way (PRoW) Visual Amenity Assessment as a separate assessment to the LVIA, is included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. The assessment relates to the impacts on users of recreational resources comprising PRoW, including public footpaths; bridleways; restricted byways; and Byways Open to All Traffic (BOAT) within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources network including the Boudicca Way. The effects on PRoW have also been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and the **Outline PRoW and Permissive Paths Management Plan (Outline PRoWPPMP) [APP-203]**. The assessment considers the effects of construction traffic, temporary PRoW closures, diversions and crossings on users of the PRoW network, including Boudicca Way. Where temporary impacts are required during construction, appropriate

ID	Theme	Representation	Applicant's Response
			mitigation measures are proposed, including signage, alternative routeing, reduced vehicle speeds, and traffic marshal support to minimise disruption and maintain safe access. No permanent closures of PRoWs are proposed as part of the Scheme and any PRoWs temporarily affected during construction will be reopened following completion of the relevant works. The assessment adopts a reasonable worst-case scenario assuming all construction activities occur simultaneously, however in practice activities will be staggered across the programme. The Applicant therefore considers that effects on PRoW users with regards to traffic and transport have been appropriately assessed and that, with the proposed mitigation in place, transport effects on PRoW users would not be significant. NPS EN-1 states at para 5.10.5 that '*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape'*, and at para 5.10.13 that '*All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites*'.

ID	Theme	Representation	Applicant's Response
			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.
SPC-128	Public Rights of Way	10.3. Baseline Conditions Public Rights of Way within and surrounding Sites 8a and 8b include: • Footpaths 19 and 22 • The Boudicca Way These routes: • Pass through or adjacent to the site • Form part of a connected recreational network • Are valued for openness, tranquillity, and views The baseline experience is characterised by: • Open views across agricultural land	The Applicant notes this response. A detailed landscape and visual assessment is presented in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** and supporting appendices and figures. This identifies and considers Footpath 19 and 22 and the Boudicca Way. A response to the Applicants approach to PRoW is provided in SPC-127.

ID	Theme	Representation	Applicant's Response
		• Strong connections to the wider countryside • High levels of tranquillity • Limited visual intrusion These attributes establish a highly sensitive recreational resource. Figure 11.3a – shows PRoW network and site relationship plan Figure 11.3b – Shows Site 8 with numbers representing viewpoints. These are shown below this map. View from Boudica Way over Site 8a and 8b. In the centre is Market Lane Farmhouse, built circa 1850, is a mid-19th century rural dwelling that contributes to the historic character of Shotesham's agricultural landscape. Constructed in traditional Norfolk brick with a pitched clay tile roof, the house retains many original features, including timber doors, and exposed internal beams. Its location along the ancient origins of Market Lane, with uninterrupted views across the surrounding fields, exemplifies the relationship between vernacular rural buildings and the open	

ID	Theme	Representation	Applicant's Response
		agricultural setting typical of this part of Norfolk. While not formally listed, the property forms part of the ensemble of historic farmsteads that collectively define the character and sense of place of Shotesham.	
SPC-129	Public Rights of Way	11.4. Assessment of Effects The Proposed Development would introduce: • Solar arrays and associated infrastructure • Security fencing and access controls • Increased visual enclosure These would directly affect routes passing through or adjacent to the site. Key effects include: • Enclosure of routes by fencing and infrastructure • Loss or filtering of open rural views • Introduction of industrial and urbanising influences • Reduction in tranquillity and sense of remoteness	A response to the assessment of effects on Footpath 19 and 22 and the Boudicca Way is provided in SPC-121. A response to the Applicants approach to PRoW is provided in SPC-127. The Schemes embedded design principles are detailed within the **Design Principles, Parameters and Commitments [APP-213]** and include measures to reduce effects upon the PRoW network including enclosure of routes, loss and change to views, tranquillity and on perceived safety. A minimum a 15m buffer from the receptor to the solar development is included. Site-specific environmental conditions informed by surveys and the environmental impact assessment process has also resulted in exclusion of development from certain locations. At Site 8 additional offsets are included to reduce the proximity of the Scheme and enclosure to the PRoW network, and land parcels excluded from the solar development to reduce the

ID	Theme	Representation	Applicant's Response
		• Changes to perceived safety and comfort This represents a fundamental change from an open rural experience to a more confined and engineered environment.	length of the PRoW directly affected by the Scheme. In some instances, proposed landscape planting as defined on the **Green Infrastructure Strategy [AS-005**] is included to reduce visibility of the infrastructure which may in certain location reduce open views. Where proposed mitigation could result in an adverse effect these have been acknowledged in **ES Volume 3, Appendix 7.9, Public Right of Way Visual Amenity Assessment [APP-149],** and **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**.
SPC-130	Public Rights of Way	11.5. Effects on User Experience The impact on Public Rights of Way extends beyond physical access to the quality of experience. The Proposed Development would result in: • Reduced scenic quality • Visual enclosure and confinement • Increased perception of industrialisation • Reduced sense of safety and comfort	A response to the Applicants approach to PRoW is provided in SPC-127, and effects in SPC-129. The Applicant disagrees that effects would be sustained over distance on the Boudicca Way. 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 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

ID	Theme	Representation	Applicant's Response
		For long-distance users, particularly along the Boudicca Way: • Effects would be sustained over distance • The continuity and enjoyment of the route would be diminished The value of these routes lies in the experience of landscape, which would be materially degraded. Community Evidence – Public Use and Value of the Landscape Evidence gathered by Shotesham Action Group I demonstrates a high level of public use and value associated with the landscape surrounding Sites 8a and 8b. Over 500 individuals signed a statement confirming that they regularly use the public footpaths located south of Shotesham All Saints, including the Boudicca Way, to enjoy the countryside. It is notable that many users come from Norwich, particularly to enjoy the beautiful village and its surrounding countryside. The statement records that the proposed solar development would be visible from approximately two miles of public	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]**. The **Green Infrastructure Strategy [AS-005]** also commits to the provision of permissive routes within the Order Limits including a proposed route in Site 8b to provide additional off-road routes which connect to existing PRoW network. 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.

ID	Theme	Representation	Applicant's Response
		footpaths and would fundamentally alter the character of the landscape. Signatories expressed clear objection to the development of over 120 acres of agricultural land based on its impact on landscape character and recreational amenity. In a survey of users of the lanes and footpaths, nearly 200 responses were collected. From this survey, it is possible to show that users of the footpaths and lanes around and through Site 8a and Site 8b come from a range of localities and therefore demonstrates the use of this area for recreational activity. Figure 11.5a – Shows the range of places where people who visit and use the lanes and footpaths regularly live. Figure 11.5b – Shows how the lanes and paths are used Figure 11.5c – Shows an image of an organised walk in Shotesham to raise awareness and objection to the proposed scheme. It was attended by over 200 people. Image is showing Footpath 22 on Site 8b	

ID	Theme	Representation	Applicant's Response
SPC-131	Public Rights of Way	This evidence demonstrates that: • The site forms part of a valued landscape in active and regular public use • The experience of Public Rights of Way is a key receptor, not a secondary consideration • The magnitude of visual and amenity effects is widely experienced and socially significant The scale of response indicates a consistent and locally informed perception of harm, which is a material consideration in the assessment of effects on amenity, landscape, and quality of life.	A response to the Applicants approach to PRoW is provided in SPC-127, and effects in SPC-129 and SPC-130. 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.
SPC-132	Public Rights of Way	11.6. Assessment Deficiencies The assessment does not provide a robust evaluation of effects on Public Rights of Way users. In particular, it fails to consider: • Experiential and perceptual effects • Sequential experience along routes	A response to the Applicants approach to PRoW is provided in SPC-127, and effects in SPC-129 and SPC-130. The Applicant considers that PRoW have been considered throughout the assessment process. A detailed landscape and visual assessment is reported in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** which considers PRoW and the effects of the Scheme on these receptor. Where

ID	Theme	Representation	Applicant's Response
		• Cumulative effects of enclosure and proximity to infrastructure • Combined impacts across Sites 8a and 8b • Interaction between visual, spatial, and sensory effects As a result: • The full extent of impact on users is not captured • Effects are likely to be underestimated 11.7 Underestimation of Recreational Effects The use of representative viewpoints does not reflect the real experience of users moving through the landscape. In practice: • Users would experience repeated and sustained exposure to development • Effects would accumulate over distance • Early-stage mitigation planting would not reduce impacts	appropriate this considers perceptual and experiential qualities and effects of enclosure and proximity to the Scheme as whole. The LVIA also includes a Public Right of Way (PRoW) Visual Amenity Assessment as a separate assessment to the LVIA, is included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. The assessment relates to the impacts on users of recreational resources considering sequential effects along routes comprising PRoW, within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources network including the Boudicca Way.

ID	Theme	Representation	Applicant's Response
		Accordingly, the effect on recreational amenity is likely to be greater than indicated.	
SPC-133	Public Rights of Way	11.8. Summary of Effects • Enclosure of footpaths and recreational routes • Loss of openness and rural character • Reduction in tranquillity and scenic quality • Degradation of user experience and amenity • Sustained effects along key routes • Underestimation of impacts due to assessment limitations 11.9. Policy Conflict The Proposed Development conflicts with: • NPS EN-1 §5.12 (amenity and quality of life) • National Planning Policy Framework (recreation and environmental quality) It has not been demonstrated that:	A response to the Applicants approach to PRoW is provided in SPC-127, and effects in SPC-129 and SPC-130.

ID	Theme	Representation	Applicant's Response
		• Recreational amenity would be preserved • User experience would be protected • Effects can be adequately mitigated	
SPC-134	Public Rights of Way	11.10. Conclusion The Proposed Development would result in a significant and harmful deterioration in the experience, amenity, and perceived safety of Public Rights of Way, including Footpaths 18, 19 and 22 and the Boudicca Way. The evidence demonstrates that: • Routes would become enclosed and industrialised • The quality of user experience would be materially degraded • Effects would be sustained and widely experienced • The assessment fails to capture the full extent of impact These impacts are significant, affect a highly sensitive receptor group, and have not been adequately assessed.	A response to the Applicants approach to PRoW is provided in SPC-127, and effects in SPC-129 and SPC-130.

ID	Theme	Representation	Applicant's Response
		In the absence of a robust assessment, it cannot be concluded that harm would be avoided. This conflict with national policy weighs against the inclusion of Sites 8a and 8b within the Proposed Development.	
SPC-135	Transport and Access	12. Transport and Access 12.1 Chapter Summary This chapter assesses the suitability of the local road network and access arrangements serving Sites 8a and 8b. It demonstrates that: The local road network is inherently unsuitable for development traffic • HGV and AIL movements cannot be safely accommodated • Market Lane is constrained, structurally weak, and subject to flooding • The transport assessment omits key routes and impacts • The access strategy relies on outline, post-consent measures	The Applicant notes the comments regarding transport and access matters associated with Sub-Sites 8A and 8B. Detailed responses to specific issues raised are provided in SPC-136 to SPC-148. The transport and access effects of the Scheme have been assessed within **ES Volume 1, Chapter 11, Transport and Access [APP-047]** and supported by the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]**, the **Outline CTMP [APP-201]** and the **Outline PRoWPPMP [APP-203]**. The proposed access strategy has been developed in consultation with NCC as the Local Highway Authority and is supported by site access design, visibility splays and swept-path analysis as detailed in Appendix C of the Transport Assessment detailed above. The assessment adopts a reasonable worst-case scenario assuming all

ID	Theme	Representation	Applicant's Response
		• The network is heavily used by vulnerable users • Impacts on residents have not been assessed • Mitigation would cause environmental harm • A viable and less harmful alternative access exists but has not been considered As a result, the Proposed Development would give rise to unacceptable highway safety risks and severe residual cumulative impacts.	construction activities occur simultaneously and concludes that, with the proposed management and mitigation measures, effects would not be significant. In practice, construction activities will be staggered across the programme. The **Outline CTMP [APP-201]** includes measures such as a delivery scheduling and monitoring system, and the use of waiting points and call forward to proactively manage construction vehicle movements and potentially restricting construction vehicle sizes for some Sub-Sites to aid manoeuvring. Construction deliveries and collections will also be scheduled to avoid peak traffic periods. These measures will be further refined in a detailed Construction Traffic Management Plan (CTMP), secured by a DCO Requirement, and developed and agreed with Norfolk County Council, in its role as Local Highway Authority. The Applicant therefore considers that the transport and access effects of the Scheme have been appropriately assessed and that a robust framework is in place to secure the necessary mitigation through the detailed

ID	Theme	Representation	Applicant's Response
			management plans required by the **Draft DCO [AS-032]**.
SPC-136	Transport and Access	12.2. Policy Context Transport and access must comply with: • National Planning Policy Framework §115 (refusal where there is unacceptable highway safety impact or severe cumulative impact) • NPS EN-1 §5.14 (safe and suitable access) • NPS EN-1 §§4.2.5 and 4.3 (adequate evidence and impacts on quality of life) 12.3. Baseline and Network Constraints It is proposed that Sites 8a and 8b are served by narrow, unclassified rural roads including: • Shotesham Road • Woodton Road • Heath Road • Market Lane • Wash Lane	The Applicant notes this comment. The characteristics of Market Lane, Shotesham Road, Woodton Road, Heath Road, Wash Lane, Baxter's Lane and Brooke Road were identified as part of the transport assessment and informed the development of the access strategy. The proposed arrangements have been developed in consultation with NCC and are assessed within **ES Volume 1, Chapter 11, Transport and Access [APP-047]**. The assessment adopts a reasonable worst-case scenario assuming all construction activities occur simultaneously; however, construction activities will in practice be staggered across the programme. The Applicant acknowledges that parts of the local road network are rural in character and constrained in places. For this reason, internal haul routes are proposed between Sites 8A and 8B and the Site 7G-K to minimise construction traffic on the Local Road Network wherever practicable. Access designs, visibility splays, vehicle tracking and swept path analysis have also been undertaken and are provided within **ES**

ID	Theme	Representation	Applicant's Response
		• Baxter's Lane • Brooke Road These roads are characterised by: • Narrow or single-track carriageways • Sharp bends and restricted visibility • Limited or no passing places • Soft verges, drainage ditches, and culverts • Poor structural capacity They require verge overrun and reversing to pass and are unsuitable for large vehicles. Market Lane is also flood-prone and periodically impassable. HGVs, vans and cars will follow the route from Church Road in Woodton, whilst cable drum deliveries using AIL, will follow High Green in Brooke to Heath Road. An internal haul road is proposed to link site 8a with site 8b, which will be accessed via Baxter's Lane and Brooke	**Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to APP-177]** The **Outline CTMP [APP-201]** includes measures such as a delivery scheduling and monitoring system, and the use of waiting points and call forward to proactively manage construction vehicle movements and potentially restricting construction vehicle sizes for some Sub-Sites to aid manoeuvring. Construction deliveries and collections will also be scheduled to avoid peak traffic periods. These measures will be further refined in a detailed Construction Traffic Management Plan (CTMP), secured by Requirement 15 of the **Draft DCO [AS-032]**, and developed and agreed with Norfolk County Council, in its role as Local Highway Authority. The Scheme's compliance with the NPPF and EN-1 is set out in the **Planning Statement [APP-209]**.

ID	Theme	Representation	Applicant's Response
		Road. Woodton Road will have two access points serving sites 7k and 7l. During an on-site meeting with Samantha Jones, East Pye Solar's project officer, on 11 July 2025, we were informed: "We know that Market Lane is not suitable to be used by works traffic." This acknowledgment from the Applicant reinforces the risks identified in the transport assessment, including highway safety, potential damage to the lane, and impacts on residents and users of adjacent footpaths. It highlights the need for alternative access arrangements, as Market Lane cannot safely accommodate HGVs, abnormal loads, or construction-related traffic.	
SPC-137	Transport and Access	12.4. Suitability for Development Traffic The road network is fundamentally unsuitable for HGV and AIL movements due to: • Insufficient carriageway width • Lack of passing places • Alignment and visibility constraints	The Applicant notes this comment, and details are addressed in SPC-136.

ID	Theme	Representation	Applicant's Response
		• Structural limitations of rural lanes • Safe access cannot be achieved without significant intervention. Likely effects include: • Verge overrun and encroachment into ditches • Accelerated road deterioration • Increased risk of conflict and unsafe manoeuvres • Flooding further reduces capacity and reliability, creating inherent highway safety risks. Figure 12.4a – shows the planned transport routes for East Pye Solar related to Site 7 and Site 8	
SPC-138	Transport and Access	Inconsistencies in the Access Strategy for Sites 8A and 8B The Transport Assessment contains a number of inconsistencies regarding the proposed access arrangements for Sites 8A and 8B which call into question the necessity of using local rural lanes for construction traffic.	The Applicant notes the comments regarding the access strategy for Site 8. Proposed site access points are shown within the **Access and Rights of Way Plan [APP-011]** and include A48 on Wash Lane. This access has been retained for flexibility, should access be required via alternative routeing due to any constraints arising during the detailed design

ID	Theme	Representation	Applicant's Response
		Table 4.1 identifies Wash Lane (Access A48) as a construction and operational access to Site 8A, Market Lane (Accesses A49 and A50) as construction and operational accesses to Sites 8A and 8B, Baxter's Lane (Access A52) as a construction and operational access to Site 8B, and Brooke Road (Access A51) as a construction and operational access to Site 8B. However, the routeing strategy set out in Table 6.1 does not utilise Wash Lane and instead routes traffic to Site 8A via Baxter's Lane, an internal haul route through Site 8B and Market Lane. The Applicant provides no explanation as to why Wash Lane remains identified as an access point if it is not intended to form part of the proposed routeing strategy. The assessment is further undermined by the fact that neither Wash Lane nor Market Lane are individually described within Table 2.4 (Highway Network Description), despite both roads being included within the study area, surveyed as part of the baseline traffic assessment and proposed as access routes to the Scheme. The Transport Assessment therefore fails to provide a clear assessment of the physical	phase following the appointment of Contractors, or during construction phase. A detailed assessment of the Study Area has been undertaken, including in-person site visits, including Wash Lane and Market Lane. The characteristics of these roads have been considered as part of the design of the access strategy, and alongside baseline data calculations and forecasting, access design, visibility splays and swept-path analysis have been undertaken and are included within the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]**. Table 4.2 of the Transport Assessment provides a high-level summary of the Study Area characteristics; however, the Applicant notes that Wash Lane and Market Lane are not explicitly listed and therefore will seek to provide additional worded descriptions on these links. Construction traffic routeing between Sub-Sites 8A and 8B includes a short section of Market Lane due to physical constraints relating to hedgerows and flood risk at Shotesham Beck, alongside the absence of suitable alternative routes. The area bisecting

ID	Theme	Representation	Applicant's Response
		characteristics and constraints of these roads, including carriageway widths, passing opportunities, visibility constraints and suitability for HGV traffic. More fundamentally, the Applicant has failed to demonstrate why the use of Market Lane is required at all. If Wash Lane provides access to Site 8A and Baxter's Lane provides access to Site 8B, there appears to be no justification for construction traffic to also use Market Lane. Furthermore, if construction traffic accesses Site 8B from Brooke Road and then moves internally between Sites 8B and 8A using a dedicated haul route connection, there would appear to be no operational requirement for construction traffic to use Market Lane, Wash Lane or Baxter's Lane. The Applicant has not demonstrated why construction traffic cannot be contained within the site itself, thereby avoiding these constrained rural lanes altogether.	the two parcels is also classified as an avoidance area within the **Outline Cable Route Construction Statement [APP-216]** meaning trenchless methods are proposed for the construction of this cable route section. The access strategy has been developed in consultation with NCC as the Local Highway Authority. The proposed internal haul routeing for Site 8 is considered the most practical approach for access and minimises movements on the Local Road Network as far as practicable.
SPC-139	Transport and Access	Given the acknowledged sensitivity of the local road network, the Examining Authority should require the Applicant to clarify the intended access strategy for Sites 8A and 8B, explain the role of Wash	The proposed access strategy has been developed following detailed assessment and consultation with NCC as the Local Highway Authority. Access design, visibility splays, vehicle tracking and swept-path analysis

ID	Theme	Representation	Applicant's Response
		Lane within that strategy, and demonstrate why the use of Market Lane, Wash Lane and Baxter's Lane is necessary when alternative arrangements appear capable of avoiding these roads entirely. Figure 12.4b – Shows a map of the proposed access route between Site 8a and Site 8b with numbered points, which have accompanying images below Image 1 – Shows the section of hedge line identified in East Pye Solar's targeted consultation, belonging to Market Lane Farm. There are four large, old oak trees in this section. East Pye Solar have not been clear about how exactly they will make the visibility splay clear in this area. Image 2 – Shows the approach to the corner of Market Lane identified in the transport plan. This is a blind bend and will have to have significant removal of old established hedgerows to improve visibility. Image 3 – Shows the corner of Market Lane identified in the transport plan. The picture shows where there is a culvert over the stream. This is completely	have been undertaken and are presented within the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to APP-177]**. An access point at Wash Lane (A48) has been retained to provide flexibility should alternative routeing be required during detailed design or construction. The proposed routeing between Sub-Sites 8A and 8B includes a short section of Market Lane due to site-specific physical constraints, including hedgerow and flood risk constraints. More detail is provided in SPC-138. The characteristics of Market Lane, Wash Lane and Baxter's Lane were considered as part of the transport assessment and informed the development of the access strategy. The assessment within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** include consideration of the Local Road Network, access requirements and associated mitigation measures. As detailed in Section 7 of the **Outline CTMP [APP-201]**, a pre-construction road condition survey will be undertaken on the LRN, with the geographical scope, extent and timing of the survey to be agreed with the Local Highway Authority. A post-construction

ID	Theme	Representation	Applicant's Response
		covered by flood water and the edges of the lane over the culvert are not visible. Image 4 – Shows the surface of Market Lane identified in the transport plan. Since this image was taken, the road has been resurfaced. However, below the surface layer Market Lane is filled with potholes, areas where the camber of the lane is causing the tarmac to split and fall away from the centre of the road, and repeated ineffective repairs, which are destroyed and washed away in high rainfall. Image 5 – Shows part of the verge identified in the transport plan. The verges on either side are Roadside Nature reserves. This is due to the presence of the plant species – Trifolium ochroleucon (Sulphur clover) grows. It is classified as vulnerable on the Great Britain red list and an uncommon and highly localised plant in Norfolk. These are likely to be destroyed during the movement of HGV's	survey will also be carried out to identify any additional defects that can reasonably be attributed to construction traffic associated with the sites. Highway defects identified from construction activities will be rectified to the satisfaction of the Local Highway Authority without any betterment to the pre-construction condition.
SPC-140	Transport and Access	Additional issues with the use of the rest of Market Lane Farm.	Responses detailing the access strategy for Site 8 is detailed in SPC-138 above. The operational and maintenance phase of the

ID	Theme	Representation	Applicant's Response
		Significant long-term concerns arise regarding Market Lane access It is important to highlight that East Pye Solar have not included workers vehicles in their proposed transport routes. Really concerningly, they have also left the access point for Site 8a and 8b on Market lane in the longer term. This raises major concerns: • It is foreseeable that site workers would come up the remainder of Market Lane. • It is foreseeable that HGV's could still use the rest of Market Lane, even though it isn't in the plan. • Once completed HGV's would have to use the lane to bring water to site to wash the panels, as there will be no access to water on site 8. This is not considered in the plan. • Other maintenance worker and vehicles would use Market Lane in the longer term, for site maintenance and landscaping	Scheme from a transport perspective is also detailed in the **Outline OTMP [APP-202]**. As detailed, there will be a small number of daily vehicle trips during operation for maintenance and cleaning activities. General operational maintenance activities would generally be expected to travel by car, appropriate 4x4 type vehicle or rigid van. The frequency of visits per month would reasonably be expected to be up to five visits per month to any of the sites, including Site 8. The traffic generation and effects on Market Lane during the operational phase are therefore not considered significant or requiring further assessment. Construction worker movements are included within the trip generation calculations assessed in **ES Volume 1 Chapter 11 - Transport and Access [APP-047]** and detailed within the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]** and **Outline CTMP [APP-201]**.

ID	Theme	Representation	Applicant's Response
		• No consideration of how panel replacement or dissassembling and removal of panels would occur. • East Pye Solar, are creating a legacy of increased sustained traffic on Market Lane without even acknowledging this or making provision for it. The series of images below are to demonstrate that Market Lane is not suitable to be used for these purposes. Figure 12.4c – Shows an image of the bottom of Market Lane following heavy rainfall and the collapse of the side of the road. This caused the road to be closed for several weeks Figure 12.4d – Demonstrates clearly how narrow Market Lane is Figure 12.4e – Shows an example of one of the blind bends along Market Lane. The lane is single carriage way, along the entire length of the lane. In a large section of lane, there are high sided banks. There are few passing places and in places to reach a passing place, it is	

ID	Theme	Representation	Applicant's Response
		necessary to reserve for some distance and around bends. There is no room for horse riders to pass in these sections and cars have to stop and put their wing mirrors in to try and allow enough space for a pedestrian to pass them safely. The mud that can be seen in Figure 12.4d is caused by the bin lorry that travels down the lane once a week. It cannot travel the lane without catching the verges on the side. Figure 12.4e – Shows a section of Market Lane beneath Site 8b in the winter Figure 12.4f – Shows a section of Market Lane between Market Lane Farm and Site 8b, with water on the lane. Extensive amounts of water drain off Site 8b. This water is draining off Site 8b, even when the weather is fine and everything around is dry. Figure 12.4g – Shows additional images of potholes and poor road condition on Market Lane Figure 12.h – Shows another blind bend on Market Lane on the approach to Site	

ID	Theme	Representation	Applicant's Response
		8b, which can be seen elevated on the left of the image.	
SPC-141	Transport and Access	12.5. Assessment of Effects The Proposed Development would result in: • Increased traffic on constrained rural lanes • Conflict between vehicles and vulnerable users • Increased accident risk and unsafe manoeuvres • Pressure on already constrained infrastructure • High levels of construction traffic on Shotesham Road in Woodton which is a single track, unclassified lane. Flooding on Market Lane would: • Reduce usable carriageway width • Create hazardous conditions • Prevent reliable access	The Applicant acknowledges the concerns raised regarding traffic on rural roads, interactions with vulnerable road users, highway safety and flooding on Market Lane. The potential effects of construction and operational traffic on local communities and non-motorised users have been assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**. 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 than links without sensitive receptors. Taking account of the proposed mitigation and management measures, the assessment concluded that effects on sensitive receptors and non-motorised users would generally be low or negligible, which is not significant in EIA terms. In fact, the ES found that no significant residual effects on transport and access are predicted during the construction, O&M or decommissioning of the Scheme. Construction traffic would be managed in accordance with the **Outline CTMP [APP-**

ID	Theme	Representation	Applicant's Response
			201], which includes measures such as delivery scheduling and monitoring systems, restrictions on vehicle types and sizes in constrained locations, and temporary traffic management where required to minimise potential conflicts and maintain highway safety. With regard to Shotesham Road in Woodton, vehicle tracking assessments have demonstrated that the proposed construction vehicles can utilise the route. In recognition of local constraints, 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, as set out in Paragraph 7.6 of the **Outline CTMP [APP-201]**. Access tracks (and upgraded bellmouths / entry points onto the Site) will incorporate appropriate surface water management measures, the detailed design of which is secured through DCO Requirement 11 of the **Draft DCO [AS-032]**.
SPC-142	Transport and Access	12.6. Assessment Limitations and Mitigation The Transport Assessment for Sites 8A and 8B contains significant omissions and inconsistencies that undermine	A detailed assessment of the Study Area has been undertaken, including in-person site visits, including Wash Lane and Market Lane. The characteristics of these roads have been considered as part of the design of the

ID	Theme	Representation	Applicant's Response
		confidence in the proposed access arrangements: • Omissions in study area: Market Lane and Wash Lane are either omitted or not described in Table 2.4, despite being surveyed and identified elsewhere as construction and operational access points. • Unassessed constraints: Narrow carriageways, limited passing opportunities, visibility, and flooding impacts on Market Lane, Wash Lane, and Baxter's Lane are not evaluated. • Inconsistent routeing: Wash Lane is identified as an access to Site 8A, Baxter's Lane to Site 8B, yet the routeing strategy omits Wash Lane and relies on Market Lane and Baxter's Lane. • Unjustified use of minor roads: If Site 8B traffic can access via Brooke Road and move internally to Site 8A using a proposed haul route and bridge, Market Lane, Wash Lane, and Baxter's Lane would not be needed. • Deferred mitigation: Key details are left to post-consent CTMP/OTMP,	access strategy, and alongside baseline data calculations and forecasting, access design, visibility splays and swept-path analysis have been undertaken and are included within **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]**. Table 4.2 of the Transport Assessment provides a high-level summary of the Study Area characteristics; however, the Applicant notes that Wash Lane and Market Lane are not explicitly listed and therefore will seek to provide additional worded descriptions on these links. The proposed routeing between Sub-Sites 8A and 8B includes a short section of Market Lane due to site-specific physical constraints, including hedgerow and flood risk constraints. More detail, including justification for the proposed routeing, is provided in SPC-138. 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

ID	Theme	Representation	Applicant's Response
		leaving access arrangements and traffic management unsecured. • Environmental consequences: Mitigation measures such as road widening, hedgerow removal, and drainage alterations would result in environmental harm and conflict with landscape and ecological objectives.	Schedule 2 of the **Draft DCO [AS-032]**. These detailed management plans will be submitted to and approved by the relevant planning authority.
SPC-143	Transport and Access	The Transport Assessment is therefore incomplete. Table 4.1 identifies Wash Lane (Access A48) as a construction and operational access to Site 8A, Market Lane (Accesses A49 and A50) as construction and operational accesses to Sites 8A and 8B, Baxter's Lane (Access A52) as a construction and operational access to Site 8B, and Brooke Road (Access A51) as a construction and operational access to Site 8B. However, the routeing strategy set out in Table 6.1 does not utilise Wash Lane, instead directing traffic to Site 8A via Baxter's Lane, an internal haul route through Site 8B, and Market Lane. No explanation is provided for this discrepancy.	The Applicant notes this comment, and responses are provided in SPC-138.
SPC-144	Transport and Access	More fundamentally, if construction traffic for Site 8B is routed from Brooke Road across Site 8B and over a proposed	The Applicant notes this comment, and responses are provided in SPC-138.

ID	Theme	Representation	Applicant's Response
		bridge connecting to Site 8A, there is no operational requirement for construction traffic to use Market Lane, Wash Lane, or Baxter's Lane. The Applicant has not demonstrated why traffic cannot be contained within the site itself, avoiding these sensitive rural lanes altogether. In addition, neither Wash Lane nor Market Lane are individually described within Table 2.4 (Highway Network Description), meaning the Transport Assessment fails to provide a clear record of their physical characteristics, constraints, and suitability for HGV traffic. Given these omissions, inconsistencies, and lack of justification, the current Transport Assessment does not adequately demonstrate that the proposed access strategy is feasible, safe, or the least environmentally harmful.	
SPC-145	Transport and Access	12.7. Alternative Access Strategy and Amenity Effects A viable alternative access strategy exists via: • Access from Brooke Road	Responses regarding the access strategy and justification for routeing proposals for Site 8 are provided in SPC-138. Construction traffic management and mitigation measures are detailed in the **Outline CTMP [APP-201]** including vehicle

ID	Theme	Representation	Applicant's Response
		• A link between Sites 8a and 8b This would: • Avoid reliance on Market Lane, Baxter's Lane and Wash Lane • Avoid flood-prone sections • Reduce conflict with vulnerable users • Reduce environmental harm Figure 12.7a – Shows model of current strategy. If cars get held up at A and B while HGV's are moving between Site 8a and 8b, how do the cars get past each other when the road is reopened? This option has not been properly assessed. The local road network is heavily used by: • Walkers, cyclists, and horse riders • Local residents Figure 12.7b – Shows proposal for alternative access strategy The Proposed Development would: • Reduce safety for vulnerable users	booking systems, traffic marshals and temporary traffic management where required, to manage vehicle movements safely and minimise disruption to other road users. The detailed traffic management arrangements will be developed through the detailed CTMP, secured through the Requirements of the **Draft DCO [AS-032]**, and agreed with NCC as the Local Highway Authority prior to construction. Effects on non-motorised users, including delay, amenity, fear and intimidation, were assessed within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, which concluded that effects would not be significant. The Applicant has reviewed Figure 12.7b provided by SPC, and does not consider that a proposed bridge over the watercourse between Sub-Sites 8A and 8B is a feasible option and would cause greater impact than the current access arrangements via Market Lane. As stated in SPC-138, construction traffic routeing between Sub-Sites 8A and 8B includes a short section of Market Lane due to physical constraints relating to hedgerows

ID	Theme	Representation	Applicant's Response
		• Increase disturbance and loss of tranquillity • Affect residential amenity, including access and safety	and flood risk. The area bisecting the two parcels is classified as an avoidance area within the **Cable Route Construction Statement [APP-216]** meaning trenchless methods are proposed for the construction of this cable route section. The proposed routeing for Site 8 is considered the most practical approach and minimises movements on the Local Road Network as far as practicable. The access strategy has been developed in consultation with NCC as the Local Highway Authority.
SPC-146	Transport and Access	12.7.1. Proposed Access Conditions (CTMP and OTMP) The assessment above demonstrates that the local road network, in particular Market Lane and Wash Lane, and Baxter's Lane, is unsuitable for HGV and AIL movements, and that their use would give rise to unacceptable highway safety risks and severe residual cumulative impacts. Conversely, access via Brooke Road provides a feasible and materially less harmful alternative, capable of accommodating development traffic without reliance on constrained rural	Responses regarding the access strategy for Site 8 and the preparation of detailed management measures is addressed in SPC-145. The Applicant does not agree that the proposed access strategy would give rise to unacceptable highway safety impacts or residual effects. The characteristics of these roads have informed the proposed access arrangements, which have been developed in consultation with NCC. The proposed strategy is supported by access design, visibility splays and swept-path analysis to determine the suitability of each respective

ID	Theme	Representation	Applicant's Response
		lanes. The inclusion of an internal connection between Sites 8a and 8b, via a bridge across the intervening watercourse, would enable all site-to-site movements to occur off the public highway network. Accordingly, if Sites 8a and 8b are to remain within the Proposed Development, it is • essential that access arrangements are secured through robust and enforceable • Construction Traffic Management Plan (CTMP) and Operational Traffic Management Plan (OTMP) requirements. These must ensure that development traffic avoids • unsuitable routes and that safe and suitable access is achieved in accordance with NPS EN-1 §5.14 and NPPF §115. The following requirements are therefore necessary to make the development acceptable in transport terms. 12.7.2. Proposed Access Conditions	access. These are detailed within Appendix C of the **Transport Assessment [APP-174 to APP-177]**. The Applicant considered alternative access arrangements during the development of the Scheme. The proposed access strategy reflects site-specific physical and environmental constraints and is considered the most practical and deliverable approach, whilst minimising effects on the Local Highway Network as far as practicable through the use of internal routes. The assessment presented within **ES Volume 1. Chapter 11 - Transport and Access [APP-047]** concludes that, with the proposed management and mitigation measures set out in the **Outline CTMP [APP-201]** and **Outline OTMP [APP-202]**, effects on highway safety would not be significant. The Applicant therefore does not agree that limiting all construction and operational traffic to Brooke Road is necessary to achieve compliance with NPS EN-1 or the NPPF. Traffic management measures will be agreed through the detailed CTMP and OTMP secured by DCO Requirement, which will be

ID	Theme	Representation	Applicant's Response
		To ensure compliance with policy and to prevent unacceptable highway safety impacts, if Sites 8a and 8b are to remain within the Proposed Development, it is essential that all construction and maintenance traffic uses Brooke Road as the sole access route. The following CTMP and OTMP conditions are proposed to: • Secure safe and suitable access in accordance with NPS EN-1 §5.14; • Protect vulnerable road users and residents; • Avoid severe cumulative impacts on Market Lane and Baxter's Lane.	substantially in accordance with the approved outline plans and approved pursuant to the Requirements of the **Draft DCO [AS-032]**.
SPC-147	Transport and Access	Proposed CTMP and OTMP Requirements for Sites 8a and 8b 1. Access Routes • Primary Access: All construction and maintenance vehicles accessing Sites 8a and 8b must use Brooke Road (A51) as the sole entry and exit point. • Prohibited Routes: Market Lane and Baxter's Lane are prohibited	The Applicant notes the suggested Construction Traffic Management Plan and Operational Traffic Management Plan requirements relating to Sites 8A and 8B. The Applicant does not agree that access to Sites 8A and 8B should be limited solely to Brooke Road, nor that Market Lane and Baxter's Lane should be excluded from the proposed access strategy. The access arrangements for these sites have been developed having regard to the physical

ID	Theme	Representation	Applicant's Response
		for all HGVs and abnormal indivisible loads (AILs), except for the temporary cable crossing on Baxter's Lane. • Internal Connection: A bridge shall be constructed across the stream between Sites 8a and 8b to allow internal vehicle movements, eliminating the need to use Market Lane or Baxter's Lane for site-to-site traffic. • Alternative Compounds: Any storage or laydown compounds (e.g., currently proposed at A52 on Baxter's Lane) shall be relocated adjacent to Brooke Road to avoid traffic on constrained rural lanes. 2. Traffic Management Measures • Signage: Directional signage shall be installed at Brooke Road to indicate the exclusive route for all HGVs, AILs, and construction traffic. • Speed Control: Maximum speeds of 20 mph shall apply to all vehicles within the site and on	constraints of the local area, highway characteristics and the operational requirements of the Scheme. 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. On this basis the area between Sites 8A and 8B is identified as an avoidance area within **the Outline 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. The suitability of the proposed access arrangements has been assessed through vehicle tracking and swept path analysis undertaken as part of the application. Construction traffic would also be managed in accordance with the **Outline CTMP [APP-201]**, which includes measures such as

ID	Theme	Representation	Applicant's Response
		adjacent approach roads to protect vulnerable road users. • Route Monitoring: GPS tracking of all HGV and AIL movements must be implemented to ensure compliance with approved access routes. • Traffic Marshals: Where site entrances intersect public roads, qualified traffic marshals must be present during peak movements to manage vehicle entry and avoid conflicts. 3. Resident and Vulnerable User Protection • Notification: Residents along the site access route shall be notified in advance of scheduled HGV deliveries and movements. • Conflict Minimisation: All vehicle movements must avoid school start/finish times and known peak pedestrian/cyclist periods where feasible. • Barrier Protection: Temporary barriers and pedestrian-safe zones	delivery scheduling and monitoring systems, temporary traffic management measures, and restrictions on vehicle types and sizes in constrained locations. The **Outline CTMP [APP-201]** and the **Outline OTMP [APP-202]** establish the framework for the management of construction and operational traffic associated with the Scheme, including measures relating to signage, speed management and traffic management. Detailed CTMP and OTMP will be developed and agreed with NCC as the Local Highway Authority secured through the DCO requirements.

ID	Theme	Representation	Applicant's Response
		shall be established at critical points near site entrances. 4. Monitoring, Compliance, and Enforcement • Reporting: Weekly reports on vehicle movements and any deviations from the approved route shall be submitted to the local highway authority or the relevant NSIP monitoring body. • Incident Log: Any incidents of HGV use on prohibited routes must be logged and reported immediately, with corrective measures implemented. • Penalties: Non-compliance (e.g., use of Market Lane or Baxter's Lane outside the cable crossing) shall trigger an immediate halt of site traffic until remedial action is verified. 5. Operational Phase (OTMP) • Maintenance vehicles must follow the same Brooke Road-only access strategy.	

ID	Theme	Representation	Applicant's Response
		• Site-to-site movements must continue to use the internal bridge to avoid Market Lane and Baxter's Lane. • Any operational deliveries requiring temporary access via Baxter's Lane (e.g., cable maintenance) must be approved in writing with prior notice to residents. 6. Implementation • This CTMP/OTMP condition shall be incorporated into the DCO requirements and be enforceable by the relevant authority. • No works on Sites 8a or 8b shall commence until the bridge design, site access, and traffic management plans are approved in writing.	
SPC-148	Transport and Access	12.9. Summary of Effects • Unacceptable highway safety risks • Severe impacts on a constrained rural network	The Applicant notes the comments regarding the transport and access effects associated with Site 8. Detailed responses to the specific matters raised are provided in SPC-136 to SPC-147.

ID	Theme	Representation	Applicant's Response
		• Increased risk due to flooding and unreliable access • Environmental harm from required mitigation • Conflict with vulnerable users • Adverse impacts on residential amenity • Underestimation of impacts due to assessment deficiencies 12.10 Policy Conflict The Proposed Development conflicts with: • NPPF §115 • NPS EN-1 §5.14 • NPS EN-1 §§4.2.5 and 4.3 It has not been demonstrated that: • Safe and suitable access can be achieved • Impacts on the road network are acceptable • Residual impacts would not be severe	The Applicant does not agree that the Scheme would result in unacceptable highway safety risks, severe impacts on the Local Highway Network, or conflict with the policy provisions cited. The transport and access effects of the Scheme have been assessed within **ES Volume 1, Chapter 11, Transport and Access [APP-047]**, supported by the **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to 177]**, the **Outline CTMP [APP-201]**, and the **Outline OTMP [APP-202]**. The access strategy has been developed in consultation with NCC as the Local Highway Authority and is supported by access design, visibility splay assessments, vehicle tracking and swept-path analysis. The assessment considers highway safety, vulnerable road users, residential receptors, HGV movements, AIL movements and cumulative effects. The assessment adopts a reasonable worst-case scenario assuming all construction activities occur simultaneously. In practice, construction activities will be staggered across the programme. The assessment concludes that, with the proposed management and mitigation in place, effects

ID	Theme	Representation	Applicant's Response
			on the highway network and road users would not be significant. The Applicant therefore considers that the safe and suitable access can achieved and that the residual transport effects of the Scheme are acceptable. Alignment with national policy with respect of transport and access is set out within Section 8.3 of the Planning Statement [APP-209] and the **Policy Compliance Document [APP-210]**.
SPC-149	Transport and Access	12.10 Conclusion The evidence demonstrates that: • The local road network serving Sites 8a and 8b is physically unsuitable for the scale and nature of development traffic proposed; • HGV and AIL movements cannot be safely accommodated; • Market Lane and Baxter's Lane are constrained rural lanes that are unsuitable for construction and operational traffic associated with the Proposed Development;	The Applicant notes this conclusion, and responses are provided in SPC-136 to SPC-148.

ID	Theme	Representation	Applicant's Response
		• Market Lane is further constrained by periodic flooding and unreliable access conditions; • The transport assessment is incomplete; • Operational and residential impacts are not assessed; • A safe and deliverable access strategy has not been demonstrated; and • A less harmful alternative has not been properly considered. Taken together, these constraints demonstrate that Sites 8a and 8b are inherently unsuitable for inclusion within the Proposed Development and should be removed from the scheme. A viable and materially less harmful access strategy exists via Brooke Road, with an internal connection between Sites 8a and 8b to avoid reliance on Market Lane and Baxter's Lane. However, this approach has not been secured or adequately assessed within the Proposed Development.	

ID	Theme	Representation	Applicant's Response
		The Proposed Development would therefore result in: • Unacceptable highway safety impacts; • Increased conflict with vulnerable road users; • Adverse effects on residential amenity; and • Severe residual cumulative impacts. In the absence of a secured Brooke Road-only access strategy, the Proposed Development cannot demonstrate safe and suitable access and would give rise to severe residual cumulative impacts, such that refusal is required in accordance with NPPF §115 and NPS EN-1 §5.14. These impacts meet the policy threshold for refusal. Transport and access constraints therefore represent a fundamental and determinative reason for refusal and weigh decisively against the inclusion of Sites 8a and 8b within the Proposed Development. Accordingly, Sites 8a and 8b should be removed from the Proposed Development. If the Examining Authority	

ID	Theme	Representation	Applicant's Response
		nevertheless concludes that the sites should remain, then Market Lane and Baxter's Lane should be excluded from all routine construction, maintenance and operational traffic movements, and a Brooke Road-only access strategy should be secured through enforceable requirements. In the absence of either outcome, the scheme should not be consented.	
SPC-150	Noise and Vibration	Chapter 13 – Noise and Vibration 13.1 Chapter Summary This chapter demonstrates that: • The receiving environment is highly sensitive to noise • The Proposed Development would introduce continuous industrial noise into a quiet rural setting • Residential receptors, including Market Lane Farm, are likely to experience significant adverse effects • Users of local lanes and Public Rights of Way would experience a loss of tranquillity	The Applicant disagrees with the assertion that the Noise and Vibration Assessment demonstrates significant adverse operational effects arising from the Scheme. **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** assesses the potential effects of construction, operation and decommissioning of the Scheme. The assessment was informed by an extensive baseline noise survey undertaken across the Order Limits. The baseline assessment confirms that whilst some locations are characterised by relatively low background sound levels, receptor-specific measurements were undertaken and incorporated into the assessment.

ID	Theme	Representation	Applicant's Response
		• The assessment is based on assumed plant and indicative layouts, not a fixed scheme • Impacts at or above significant adverse effect thresholds (SOAEL) are identified • Vibration impacts, including effects on vulnerable structures, have not been assessed • The assessment relies on uncertain, post-consent mitigation As a result: • The assessment is not robust or reliable • The scale of impacts is uncertain and likely underestimated • Significant adverse effects on amenity and quality of life cannot be ruled out The proposal therefore conflicts with national policy. Figure 13.1a – shows that East Pye Solar have identified themselves that receptors within the vicinity of Site 8 will be either	The Interested Party states that residential receptors, including Market Lane Farm, are likely to experience significant adverse effects from operational noise. This is not supported by the conclusions of the ES. The operational assessment identified that, prior to additional mitigation, seven receptors could experience rating levels between the LOAEL and SOAEL during the early morning period only. No receptors were predicted to exceed the SOAEL during operation. Additional mitigation measures have been identified and secured through the **Outline OEMP [APP-197]**. Following implementation of these measures, no residential receptors are predicted to experience significant adverse operational noise effects. The Interested Party refers specifically to Market Lane Farm (NSR62), Dawson's Farm (NSR60) and Baxter's Lane (NSR59). The assessment identified that operational noise can be appropriately controlled through the design measures secured within the **Outline OEMP [APP-197]**, and the residual effects following mitigation are assessed as

ID	Theme	Representation	Applicant's Response
		moderately or majorly impacted by noise and vibration Figure 13.1b – shows that operational noise levels are likely to impact and be noticeable to residents of Market Lane Farm, Dawson's Farm and Baxter's Lane. Ambient sound levels are very low in these areas, and this would be massively impactful on wellbeing for those residents	negligible to minor adverse and not significant in EIA terms. The assertion that the assessment identifies impacts at or above Significant Observed Adverse Effect Level (SOAEL) thresholds is incorrect in relation to the operational phase. The ES explicitly states that no residential receptors are predicted to experience operational noise levels above the SOAEL. Following mitigation, all receptors are predicted to be at or below the LOAEL, with all but one receptor below the NOAEL. The remaining receptor is predicted to experience a rating level only 1-2 dB above background sound level due to the BESS site, which is assessed as a minor adverse effect and not significant. The Interested Party also suggests that impacts on users of local roads and Public Rights of Way would result in a loss of tranquillity. Operational noise effects on Public Rights of Way were specifically assessed. The ES predicts negligible to low magnitude impacts with negligible effects that are not significant. Calculated noise levels along Public Rights of Way generally remain below the criteria adopted from WHO

ID	Theme	Representation	Applicant's Response
			Guidelines for Community Noise and below the assessment thresholds used within the ES. The Interested Party further claims that vibration impacts, including effects on vulnerable structures, have not been assessed. Construction vibration effects were assessed using BS 5228-2 and associated guidance. The assessment concluded that vibration effects from piling, HDD activities and construction traffic would generally be negligible to low and not significant. Potential impacts on sensitive structures were also considered, with reference to recognised building vibration guidance. Operational vibration was scoped out on the basis that fixed electrical infrastructure is not expected to generate perceptible vibration at sensitive receptors, a position accepted through the EIA scoping process. The Interested Party states that the assessment relies on assumed plant and indicative layouts rather than a fixed scheme. The Applicant acknowledges that detailed equipment specifications are not available at the DCO Application stage. However, this is

ID	Theme	Representation	Applicant's Response
			standard practice for NSIP assessments. The operational assessment adopts a reasonable worst-case design scenario using representative plant sound power levels, conservative operating assumptions and example layouts that demonstrate compliance with the noise requirements secured through the **Outline OEMP [APP-197]**. The assessment therefore represents a robust and precautionary approach consistent with the requirements of the EIA Regulations and established NSIP practice. Figure 13.1a as provided by the Interested Party summarises the operational noise levels at receptors around Site 8 as presented within the Preliminary Environmental Information Report, without additional mitigation. Figure 13.1b is also from the Preliminary Environmental Information Report, and is a contour plan showing the calculated specific sound levels across Site 8, without additional mitigation. The assessment of operational noise is provided in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**.

ID	Theme	Representation	Applicant's Response
SPC-151	Noise and Vibration	13.2. Policy Context Development must ensure that: • Significant adverse effects on health and quality of life are avoided • Residential amenity is protected Decisions are based on robust and reliable evidence Relevant policy includes: • NPS EN-1 §§4.2, 4.3 and 5.12 (Noise) • NPPF §§174 and 185 • Noise Policy Statement for England (NPSE) Where uncertainty exists, a precautionary approach is required 13.3 Baseline Conditions and Sensitivity Sites 8a and 8b lie within a quiet rural environment, characterised by: • Very low background noise levels (approximately 18–28 dB LA90) • Natural sound sources • Minimal human activity Key receptors include:	The assessment of noise is assessed in-line with the requirements of NPS EN-1, NPPF and the NPSE. The representation correctly notes that some receptors in the vicinity of Site 8 are located within a relatively quiet rural environment. Baseline monitoring undertaken at survey locations representative of Market Lane Farm, Dawson's Farm and nearby dwellings recorded typical night-time and early morning background sound levels within the range identified in the representation. These baseline conditions were explicitly incorporated into the operational assessment through receptor-specific BS 4142 assessments. The assessment therefore accounts for the high sensitivity of residential receptors and the potential for noise to be perceptible in quieter rural locations. The assessment demonstrates that receptor sensitivity, baseline sound levels, predicted operational sound levels and the acoustic context have all been considered in accordance with BS 4142. The assessment further recognises that where background sound levels are very low, absolute sound levels become increasingly important when determining the likelihood of adverse effects.

ID	Theme	Representation	Applicant's Response
		• Market Lane Farm (in close proximity to Site 8b) and Dawson's Farm (in close proximity to Site 8a) • Other nearby dwellings • Users of local roads, footpaths, and the surrounding countryside In such conditions: • Even small increases in noise are clearly perceptible • Continuous mechanical noise represents a fundamental change in character • Receptor sensitivity is therefore high.	Market Lane Farm (NSR62), Dawson's Farm (NSR60) and nearby residential receptors were included within the operational assessment for Site 8. Prior to additional mitigation, a limited number of receptors across the Scheme were identified as potentially experiencing noise levels above the LOAEL during the early morning period. No residential receptors were predicted to experience operational noise levels above the SOAEL. Additional mitigation measures have been identified and secured through the **Outline OEMP [APP-197]**, including lower noise plant specification, acoustic treatment and optimisation of equipment layout. Following implementation of these measures, no residential receptors are predicted to experience significant residual operational noise effects.
SPC-152	Noise and Vibration	13.4. Assessment of Effects Operational Noise The Proposed Development would introduce:	The Applicant disagrees with the assertion that the Scheme would result in significant adverse operational noise effects at Market Lane Farm, Dawson's Farm or other nearby receptors. The operational noise assessment was undertaken using BS 4142:2014+A1:2019 and is based on

ID	Theme	Representation	Applicant's Response
		• Continuous 24-hour noise from substations and BESS • Persistent mechanical and electrical noise • Potential tonal and low-frequency characteristics At nearby receptors, this would result in: • A continuous background hum • A clear contrast with the existing rural soundscape • A shift from natural to industrial acoustic character The Applicant's own framework identifies thresholds for: • Adverse effects (LOAEL) • Significant adverse effects (SOAEL) Given the very low baseline, predicted increases are likely to: • Approach or exceed these thresholds • Result in significant adverse effects at residential receptors Effects on Residents	measured baseline sound levels obtained from long-term environmental sound surveys. The assessment demonstrates that no residential receptors are predicted to experience operational noise levels above the SOAEL. Following the implementation of mitigation secured through the **Outline OEMP [APP-197]**, residual operational effects are predicted to be negligible to minor adverse and not significant in EIA terms. The Applicant disagrees that construction noise would result in significant adverse effects. Construction activities have been assessed in accordance with BS 5228 and, taking account of embedded mitigation and the temporary nature of the works, construction noise effects are assessed as negligible to minor adverse and not significant. Where short-duration activities such as HDD could generate elevated noise levels, appropriate controls and mitigation are secured through the **Outline CEMP [APP-196]** and, where necessary, the Section 61 consent process. The assertion that vibration effects have not been adequately assessed is incorrect.

ID	Theme	Representation	Applicant's Response
		At Market Lane Farm, Dawson's Farm and nearby dwellings: • Noise would be continuous and perceptible • Rural tranquillity would be lost • Residential amenity would be materially affected Effects on Users of the Landscape Users of the surrounding area would experience: • Loss of tranquillity • Introduction of a constant mechanical background sound • A change in the character of the landscape These effects would be experienced along: • Local roads • Public Rights of Way • The wider countryside Construction Noise Construction activities would result in:	Construction vibration from piling, HDD activities and construction traffic was assessed using BS 5228-2 and recognised vibration guidance. The assessment concluded that vibration effects would generally be negligible to low and not significant. The ES also specifically considers vibration impacts from construction traffic and sensitive structures. The following commitments are included in the **Outline OEMP [APP-197]**: • Noise from the BESS will achieve the predicted sound levels in **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]**. • The rating level from other elements will not exceed the background sound level at other residential receptors. • Specific sound levels on ProWs will not exceed 55 dBA. Based on these commitments, appropriate mitigation measures are secured and will be implemented.

ID	Theme	Representation	Applicant's Response
		• Substantial increases in noise levels • Clearly perceptible and intrusive effects • Repeated disturbance over extended periods This would result in temporary but significant adverse effects. Vibration Effects Vibration impacts have not been adequately assessed. Construction activities, including: • Heavy vehicle movements • Groundworks and piling have the potential to generate vibration. Market Lane Farm is particularly vulnerable due to: • Structural characteristics • Proximity to access routes No site-specific assessment has been undertaken.	
SPC-153	Noise and Vibration	13.5 Assessment Limitations	As is typical for NSIP applications at the DCO stage, the detailed specification and final arrangement of operational plant is not fixed.

ID	Theme	Representation	Applicant's Response
		The assessment is affected by significant limitations, including: • Reliance on assumed plant and indicative layouts • Absence of a fixed and assessed design • Dependence on post-consent mitigation • Limited assessment of tonal and low-frequency noise • Failure to reflect real-world acoustic conditions • No robust assessment of vibration or receptor vulnerability As a result: • The full extent of impacts is uncertain • Effects are likely to be underestimated	Accordingly, the assessment adopts a reasonable worst-case approach using representative plant data, conservative operational assumptions and example layouts designed to demonstrate compliance with the noise limits secured through the **Outline OEMP [APP-197]**. **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** also includes specific consideration of low-frequency noise, which was assessed against NANR45 guidance. The assessment concluded that predicted low-frequency noise levels are below the relevant criteria and do not alter the significance of effects. In addition, the assessment considered potential tonal characteristics and concluded that no acoustic character corrections were required based on the equipment assessed. The Applicant considers that vibration and receptor vulnerability have been assessed. Construction vibration effects from piling, HDD activities and construction traffic were assessed using BS 5228-2 and other recognised guidance, including consideration of sensitive structures and building damage criteria. The assessment concluded that

ID	Theme	Representation	Applicant's Response
			vibration effects would generally be negligible to low and not significant.
SPC-154	Noise and Vibration	13.6. Summary of Effects • Introduction of continuous industrial noise • Loss of rural tranquillity • Significant effects on residential amenity • Adverse effects on users of the landscape and PRoW • Potential vibration impacts on sensitive receptors • Uncertainty regarding the effectiveness of mitigation 13.7. Policy Conflict The Proposed Development conflicts with: • NPS EN-1 §§4.2 and 4.3 (adequate evidence and mitigation) • NPS EN-1 §5.12 (noise and quality of life) • NPPF §§174 and 185	As per the Applicant's responses to SPC-150 and SPC-151, the assessment of noise is assessed in-line with the requirements of NPS EN-1, NPPF and the NPSE. The Applicant does not agree that the Scheme would result in significant adverse residual noise or vibration effects, or that it conflicts with national policy. **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** concludes that, following the implementation of embedded and additional mitigation secured through the Scheme design and **Outline OEMP [APP-197]**, there would be no significant residual noise or vibration effects during construction, operation or decommissioning. Operational noise assessments predict no receptors above the SOAEL, whilst effects at Public Rights of Way are assessed as negligible and not significant. Construction noise and vibration effects are assessed as negligible to minor adverse and not significant, with appropriate controls secured through the

ID	Theme	Representation	Applicant's Response
		It has not been demonstrated that: • Significant adverse effects would be avoided • Residential amenity would be protected • Impacts can be effectively mitigated	**Outline CEMP [APP-196]** and other management plans.
SPC-155	Noise and Vibration	13.8. Conclusion The Proposed Development would introduce continuous industrial noise into a highly sensitive rural environment, fundamentally altering its character. The evidence demonstrates that: • Residential receptors would experience persistent and perceptible noise • Users of the surrounding landscape would experience a loss of tranquillity • Vibration impacts remain unassessed • The assessment is based on uncertain assumptions and unproven mitigation It cannot be concluded that:	The Applicant disagrees with the conclusions presented. The **ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]** has been undertaken using measured baseline survey data and recognised assessment methodologies and concludes that, following the implementation of embedded and secured mitigation, there would be no significant residual noise or vibration effects during construction, operation or decommissioning. Operational noise from substations, BESS infrastructure and solar equipment was assessed using conservative worst-case assumptions. No residential receptors are predicted to experience noise levels above the SOAEL, and residual operational effects are assessed as negligible to minor adverse and not significant. Public Rights of Way and landscape users were also assessed, with

ID	Theme	Representation	Applicant's Response
		• Significant adverse effects would be avoided • Amenity and quality of life would be protected • Applying the precautionary principle, the decision-maker cannot be satisfied that the Proposed Development would avoid unacceptable harm. This uncertainty attracts substantial weight and weighs strongly against the inclusion of Sites 8a and 8b.	effects concluded to be negligible and not significant. Construction vibration from piling, HDD activities and construction traffic was assessed in accordance with BS 5228-2 and other recognised guidance, with effects found to be negligible to low and not significant. Accordingly, the Applicant considers that the assessment of the likely noise and vibration effects of the Scheme is robust, compliant with legislation, policy and guidance and has demonstrated that significant adverse effects would be avoided, residential amenity would be protected, and appropriate mitigation measures can be effectively secured. The conclusions of **ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** therefore support compliance with the relevant requirements of NPS EN-1, the NPPF and the Noise Policy Statement for England.
SPC-156	Glint and Glare	Chapter 14 – Glint and Glare 14.1 Chapter Summary This chapter demonstrates that: • Key receptors, including Market Lane Farm and the Boudicca Way, are not properly assessed	Market Lane Farm is represented by dwelling receptors 210 and 211 in **ES Volume 3, Appendix 18.1 - Glint and Glare Assessment – Part 5 [AS-029]**. For the fixed panel layout, reflecting panels are beyond the closest field, which rises steeply away from the dwellings, and set further back into the

ID	Theme	Representation	Applicant's Response
		• The assessment relies on theoretical modelling without real-world validation • The duration and frequency of glint and glare effects are not clearly quantified • Topography and visibility are inadequately represented • Mitigation is assumed but not demonstrated or secured • Worst-case and seasonal conditions are not robustly assessed As a result: • The assessment is incomplete and unreliable • The scale of impacts is uncertain and likely underestimated • Significant adverse effects on residential amenity and users of Public Rights of Way cannot be ruled out The proposal therefore conflicts with national policy. 14.2. Policy Context	next field. The solar panels will therefore be hidden by the existing vegetation and topography. The modelling output showing the reflecting panels can be provided upon request. For the tracking layout, no solar reflections are geometrically possible towards these two receptors. This is not stated in the report because the worst-case between fixed panels and tracking panels is mentioned on a conservative basis. Any glint and glare effects experienced along Boudicca way by an observer are predicted to be of low significance. This is because: • Effects would typically coincide with direct sunlight. The Sun is a far more significant source of light; • The reflection intensity is similar for solar panels and still water (and significantly less than reflections from glass and steel) which is frequently a feature of the outdoor environment surrounding footpaths. Therefore, the reflections are likely to be comparable to those from common outdoor sources whilst walking on a PRoW;

ID	Theme	Representation	Applicant's Response
		National policy requires that environmental effects are robustly assessed and evidenced. In particular: • NPS EN-1 requires decisions to be based on adequate evidence and a precautionary approach where uncertainty exists • NPS EN-3 requires identification of all sensitive receptors and proper assessment of glint and glare • NPPF requires protection of amenity and landscape character Where impacts are uncertain or not properly assessed, decision-makers cannot be satisfied that effects are acceptable.	• 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 footpath are transient, and time and location sensitive whereby an observer could move beyond the solar reflection zone with ease with little impact upon safety or amenity. It is standard EIA practice for glint and glare effects to be assessed via modelling. The modelling is supplemented by site surveys and site photography, where appropriate. The duration of effects for the dwelling receptors, with reference to the assessment thresholds, have been provided. The duration and frequency is not a material consideration for road receptors, instead the glare scenario (e.g. location relative to the direction of travel) is considered. Visibility has been determined through a review of the various sources of imagery and,

ID	Theme	Representation	Applicant's Response
			where visibility cannot be conclusively ruled out, it is assumed views of the solar panels are possible. The worst-case conditions have been assessed as the modelling assumes clear and sunny weather at all times, in practice cloud cover will reduce the instances of glare. Seasonal conditions are considered when determining the level of vegetation coverage during the times where solar reflections are geometrically possible. The density of the screening is also considered, where vegetation not in leaf would still provide sufficient screening due to being a dense and deep area of vegetation. Mitigation Measures in respect of glint and glare are secured in the **Outline OEMP [APP-197]** at Table 3.16. **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]** presents an assessment of likely effects glint and glare. In compliance with the aims NPS EN-3 paragraph 2.10.150, the Applicant has considered solar reflection on residential dwellings and users of roads and aerodromes (no rail infrastructure was identified in the study area for the assessment and PRoW scoped out of the assessment). The

ID	Theme	Representation	Applicant's Response
			assessment concluded that with mitigation in place, no significant residual effects would arise during the construction and operation phases of the Scheme. No cumulative effects have been identified. In respect of paragraph 2.10.151 of NPS EN-3, no significant impairment has been identified in relation to glint and glare and overall the Scheme complies with the provisions of NPS EN-3.
SPC-157	Glint and Glare	14.3. Baseline Conditions and Sensitivity Sites 8a and 8b lie within an open rural landscape characterised by: • Long-distance views across a shallow valley • High levels of visibility between receptors and the site • Strong recreational use of the surrounding countryside Key receptors include: • Market Lane Farm and Dawson's Farm, located in close proximity to Site 8a and 8b	Market Lane Farm (receptors 210 and 211) has been assessed within **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 5) [AS-029]**. Dawson's Farm was not assessed within **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 5) [AS-029]**, as it was judged not to have views of the Scheme due to existing screening. As per the response to SPC-156, any glint and glare effects experienced along Boudicca way by an observer are predicted to be of low significance. As noted in SPC-121 with regard to landscape and visual matters and as reflected in **ES Volume 1, Chapter 7 -**

ID	Theme	Representation	Applicant's Response
		• Users of the Boudicca Way, a long-distance route with open views toward the site These receptors are highly sensitive due to: • Residential amenity and outlook • Prolonged exposure and sequential experience (PRoW users) • Expectations of tranquillity and rural character	**Landscape and Visual [APP-043]**, residents and recreational users are considered to be receptors of high sensitivity. Dawson's Farm is located within the 100m study area considered in **ES Volume 3: Appendix 7.8 – Residential Visual Amenity Assessment [APP-148]**, and an initial assessment has been undertaken. However, it was determined that no further assessment is required as it was judged not to have views of the Scheme due to the existing screening. **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** includes View Location VL8/Site 8 which is located to the north west of Dawsons Farm on Wash Lane. From this location the Applicant considers that the embedded mitigation measures, including the proposed woodland planting as set out in the **Green Infrastructure Strategy [AS-005]**, provide sufficient mitigation to screen the Scheme. A visualisation is presented in **ES Volume 3, Appendix 7.6 Visualisations [APP-144]** for this location.
SPC-158	Glint and Glare	14.4. Assessment of Effects Effects on Residential Receptors	In respect of effects on Residential Receptors:

ID	Theme	Representation	Applicant's Response
		Market Lane Farm is identified elsewhere in the Environmental Statement as a high-sensitivity residential receptor, but is not clearly assessed within the Glint and Glare Assessment. The assessment does not provide: • A discrete receptor assessment • Quantified duration or frequency of glare Robust analysis of visibility and orientation Given: • The elevated position of Site 8b • The direct line of sight across the valley • The absence of established screening there is clear potential for glint and glare to affect residential amenity. This impact remains uncertain and unquantified. Effects on Public Rights of Way The Boudicca Way passes through open countryside with direct views toward Site 8b. Users of this route are highly sensitive due to: • Prolonged and sequential exposure	Market Lane Farm is represented by receptors 210 and 211 in **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 5) [AS-029]**. • No impacts are predicted to be experienced within Market Lane Farm due to reflecting panels not being visible. • Visibility from Market Lane Farm has been robustly considered; the reflecting panels will be obstructed by the topography and existing trees. • The modelling output showing the reflecting panels can be provided upon request. The effects on residential amenity have been robustly assessed in accordance with the assessment methodology. Where significant effects have been identified, the Applicant has proposed mitigation to reduce the effects. In respect of effects on Public Rights of Way: • As per the response to SPC-156, any glint and glare effects experienced along Boudicca way by an observer are predicted to be of low significance.

ID	Theme	Representation	Applicant's Response
		• Open views and elevated vantage points • Expectations of tranquillity The assessment does not: • Consider the sequential experience of users moving along the route • Quantify duration or frequency of glare events • Assess how glare would be perceived in practice Given the openness of the landscape, users are likely to experience: • Direct views of solar panels • Potential reflected light under certain conditions • A change in the experiential quality of the route These effects are material but not adequately assessed.	
SPC-159	Glint and Glare	Assessment Limitations The assessment is affected by significant limitations, including:	See previous response to SPC-156.

ID	Theme	Representation	Applicant's Response
		• Reliance on theoretical modelling without field verification • Failure to identify and assess all sensitive receptors • Absence of quantified duration and frequency of effects • Inadequate representation of topography and visibility • Reliance on unproven and unsecured mitigation • Failure to assess worst-case conditions, including winter scenarios As a result: • The full extent of impacts is uncertain • Effects are likely to be underestimated 14.6. Summary of Effects • Potential glint and glare affecting residential receptors • Impacts on users of the Boudicca Way and surrounding PRoW • Degradation of visual amenity and rural character	

ID	Theme	Representation	Applicant's Response
		• Uncertainty regarding the effectiveness of mitigation	
SPC-160	Glint and Glare	14.7. Policy Conflict The Proposed Development conflicts with: • NPS EN-1 (adequate evidence and precautionary approach) • NPS EN-3 (assessment of glint and glare and receptor identification) • NPPF (protection of amenity and landscape character) It has not been demonstrated that: • All sensitive receptors have been identified • Effects have been properly assessed • Impacts can be effectively mitigated 14.8. Conclusion The Glint and Glare Assessment does not demonstrate that impacts on residential receptors or users of Public Rights of Way would be avoided. The evidence demonstrates that:	The Applicant considers that all the appropriate sensitive receptors have been assessed. The effects have been assessed in accordance with the assessment methodology, which has been utilised on several DCO applications and has been proven to be robust through examination and challenge. Mitigation has been proposed where significant impacts have been identified to eliminate or sufficiently reduce effects to acceptable levels. Mitigation Measures in respect of glint and glare are secured in the **Outline OEMP [APP-197]** at Table 3.16, namely: • Screening in the form of proposed vegetation such as mature tree and shrub planting for separate 300m, 400m and 500m sections of the B1527 and 46 dwellings will be used to obstruct views of reflecting panels. Full details regarding the landscape mitigation are presented in the **Outline LEMP [APP-199]**.

ID	Theme	Representation	Applicant's Response
		• Key receptors, including Market Lane Farm and the Boudicca Way, are not properly assessed • Effects are not quantified in terms of duration or frequency • Mitigation is uncertain and unproven • Worst-case conditions have not been assessed It cannot be concluded that: • Significant adverse effects would be avoided • Amenity and user experience would be protected Applying the precautionary principle, the decision-maker cannot be satisfied that the Proposed Development would avoid unacceptable harm. This uncertainty attracts substantial weight and weighs strongly against the inclusion of Sites 8a and 8b.	• Where practicable and necessary, the impact of glint and glare can be mitigated by changing the backtracking angle to tilt solar reflections away from receptors. Further mitigation can be implemented by changing the configuration of panels, such as the azimuth, tilt (for fixed panels) and backtracking angle (for single-axis tracking panels). • Additionally, existing vegetation along the boundary of the Order limits will be retained and managed where practicable to ensure its continued presence and to aid the screening of low-level views into the Order limits. See response to SPC-156 for further information regarding Market Lane Farm, Boudicca Way and the remaining points.
SPC-161	Need for Scheme	Chapter 15 – Planning Balance 15.1 Introduction This chapter assesses the planning balance in relation to the inclusion of	The Applicant refers to its response in row reference SPC-061 above.

ID	Theme	Representation	Applicant's Response
		Sites 8a and 8b within the Proposed Development. It draws together the evidence presented in earlier chapters, weighing the limited benefits of these sites against the range of adverse effects identified. The Examining Authority must consider whether the impacts of the Proposed Development are acceptable, and whether Sites 8a and 8b are necessary to achieve the overall objectives of the scheme. 15.2 Benefits of the Proposed Development The Proposed Development as a whole contributes to: • Renewable energy generation • Reduction in greenhouse gas emissions • Delivery of net zero objectives • National energy security However, Sites 8a and 8b comprise a small proportion of the scheme—less than 3% of the total development including solar arrays, BESS, and cable	

ID	Theme	Representation	Applicant's Response
		corridors. There is no evidence demonstrating that these sites are essential to achieving the scheme's objectives or that their removal would materially affect capacity, viability, or deliverability. Conclusion: The specific contribution of Sites 8a and 8b to the overall benefits of the scheme is limited and attracts correspondingly limited weight in the planning balance.	
SPC-162	Significant Effects	15.3 Key Adverse Impacts The evidence demonstrates that Sites 8a and 8b give rise to significant, cumulative, and site-specific adverse effects across multiple disciplines: • Ecology & Biodiversity: Risk to protected and priority species, habitat loss and fragmentation, and uncertainty in mitigation measures. • Water Environment & Hydrology: Increased runoff, flood risk, sediment and pollution pathways, and impacts on private water supplies.	The Applicant has assessed the likely significant effects in 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. The management plans are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032].** See applicants response to rows SPC-066 to SPC-074 in relation to ecology and biodiversity, rows SPC-075 to SPC-101 in relation to water environment and hydrology, rows SPC-102 to SPC-108 in relation to soils and agricultural land, rows SPC-109 to SPC-126 in relation to landscape and heritage, rows SPC-127 to SPC-134 in relation to

ID	Theme	Representation	Applicant's Response
		• Soils and Agricultural Land: Soil compaction, degradation, and loss of productive land. • Landscape and Heritage: Harm to the setting of heritage assets and sensitive landscape character. • Transport and Access: Market Lane is constrained, single track, and unable to safely accommodate HGV movements without unacceptable impacts. • Amenity: Disruption to residents, walkers, horse riders, and users of Public Rights of Way. • EIA and Assessment Deficiencies: Incomplete baseline data, reliance on assumed mitigation, and deferral of key environmental information increase uncertainty across all topic areas. These impacts are inherent to the sites and cannot be mitigated without significant residual harm.	transport and access, row SPC-135 to SPC-149 in relation to amenity, and rows SPC-044 to SPC-055 in relation to EIA methodology. 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. The Applicants position is that most significant adverse effects associated with the Scheme would be temporary and reversible. Furthermore, substantial 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.
SPC-163	Site Selection	15.4. Alternatives and Proportionality Evidence demonstrates that:	The Applicant refers to its response in row reference SPC-061 above.

ID	Theme	Representation	Applicant's Response
	and Alternatives	• Alternative configurations exist that would avoid or reduce reliance on Sites 8a and 8b. • These sites constitute only a small portion of the overall scheme. • Removal of Sites 8a and 8b would substantially reduce environmental harm while having negligible effect on the delivery of scheme benefits. Conclusion: The inclusion of Sites 8a and 8b is disproportionate to the limited benefits they provide.	
SPC-164	Need for the Scheme	15.5. Planning Balance Benefits: • Renewable energy generation attracts substantial weight, but the contribution of Sites 8a and 8b is minor. Harms: • Significant adverse environmental effects across multiple disciplines • Failure to comply with EN-1 assessment and mitigation requirements	The Applicant refers to its response in row reference SPC-061 above. 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. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably shows substantial public benefits (arising from all constituent parts of the Scheme, including Sites 8a and 8b). It would not be

ID	Theme	Representation	Applicant's Response
		• Conflict with EN-3 site selection principles • Residual uncertainty due to EIA deficiencies Overall: The harms arising from Sites 8a and 8b clearly outweigh their limited benefits. The sites are not essential to the delivery of the scheme and their inclusion results in disproportionate environmental harm.	consistent with the government's objectives to deliver a scheme which is smaller than that which the Applicant has assessed as being acceptable on a planning basis. The Applicant has assessed the likely significant effects in the technical chapters of **ES Volume 1 [APP-042 to APP-056]** and outlined the measures taken to avoid, mitigate and minimise these effects as far as possible. The management plans are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032].** The proposed management and mitigation measures set out in the **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 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.

ID	Theme	Representation	Applicant's Response
SPC-165	Need for the Scheme	15.6. Conclusion The evidence shows that Sites 8a and 8b: • Give rise to cumulative, site-specific, and substantial adverse effects • Are not required for the delivery of the Proposed Development • Have less harmful alternatives available Recommendation: Sites 8a and 8b should be removed from the Order Limits of the Proposed Development. Their exclusion represents a proportionate, reasonable, and deliverable approach, reducing harm while preserving the scheme's overall benefits.	The Applicant refers to its response in row reference SPC-061 above. Further, the Applicant has assessed the likely significant effects in 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. The management plans are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032].** The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [APP-209]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy. 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]. The Statement of Need confirms that the need for the

ID	Theme	Representation	Applicant's Response
			Scheme is urgent and that substantial weight should be given to the need in accordance with NPS EN-1 (2025) Para 3.2.9-3.2.10. It would therefore 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. The proposed management and mitigation measures set out in the **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 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.
SPC-166	Policy compliance	Chapter 16: Conclusion 16.1. Summary of Findings The evidence presented throughout this document demonstrates that Sites 8a and 8b: • Form part of a highly sensitive environmental and historic landscape.	A response addressing concerns with sites 8A and Site 8B is provided at SPC-020. Compliance with national policy is set out within the **Planning Statement [APP-209]** and **Policy Compliance Document [APP-210].**

ID	Theme	Representation	Applicant's Response
		• Are subject to multiple, overlapping, and interacting constraints. • Give rise to significant adverse impacts across numerous topic areas, including landscape, heritage, ecology, hydrology, transport, amenity, and noise. These impacts are both site-specific and inherent, arising from the location and characteristics of the land. 16.2. Compliance with National Policy The Proposed Development at Sites 8a and 8b fails to demonstrate compliance with key provisions of national policy, including: • National Policy Statement EN-1 (Sections 4.2, 4.3, 5.4, 5.8, 5.9 and 5.10). • National Policy Statement EN-3, in respect of site selection and efficient land use. It has not been demonstrated that: • Environmental impacts have been properly and robustly assessed.	Please refer to the Applicant's response to rows SPC-037 to SPC-040, in relation to the EIA methodology. The **Site Selection Assessment [APP-215]** sets out the approach to site selection and the consideration of potentially reasonable alternative sites, 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 section 2.10 of NPS EN-3, and the Applicant considers that it has demonstrated compliance with the relevant site selection criteria set out in NPS EN-1, NPS EN-3 and NPS EN-5. The sites selected for the Scheme have been subject to detailed assessment within the **ES [APP-036 to APP-195]**. The overall planning balance, with consideration of the likely

ID	Theme	Representation	Applicant's Response
		• Adverse effects have been avoided, minimised, or effectively mitigated. • The site represents an appropriate, suitable, or necessary location for development. Accordingly, the requirements of the relevant policy framework have not been met.	effects from the Scheme, is set out within the **Planning Statement [APP-209]**. 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 Applicant therefore considers that the sites selected have been subject to a robust and transparent process of environmental assessment which verifies their suitability for the Scheme. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme 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. The **Site Selection Assessment [APP-215]** concludes that there are no locations identified within the search area that are more

ID	Theme	Representation	Applicant's Response
			suitable and available than the proposed location for the Scheme, and, in accordance with paragraph 4.3.24 of NPS EN-1, 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.
SPC-167	Site Selection and Alternatives	16.3. Necessity and Alternatives The Examining Authority is invited to give significant weight to the following: • Sites 8a and 8b are not required to deliver the overall objectives of the Proposed Development. • Their contribution to total generating capacity is limited. Alternative configurations of the scheme are clearly feasible and The removal of Site 8 would:	A response addressing concerns with sites 8A and Site 8B is provided at SPC-013 to SPC-020.

ID	Theme	Representation	Applicant's Response
		• Not materially affect the delivery of scheme benefits; but • Substantially reduce environmental harm and policy conflict. This represents a proportionate and reasonable alternative.	
SPC-168	EIA Methodology	16.4. Overall Reliability of the Environmental Statement The Environmental Statement demonstrates a consistent pattern of: • High-level assessment. • Reliance on assumed mitigation. • Deferral of key details to post-consent stages. Across multiple topics, potential impacts are identified but subsequently minimised through assumptions rather than robust evidence. This results in a body of environmental information that is affected by uncertainty and is likely to underestimate the true extent of impacts. In these circumstances, the decision-maker cannot be satisfied that the effects of the Proposed Development have been fully or properly assessed. Accordingly,	See Applicants response to rows SPC-037 to SPC-040, in relation to the EIA methodology. The **ES [APP-036 to APP-195]** sets out a robust and proportionate assessment in accordance with industry best practice and PINS guidance.

ID	Theme	Representation	Applicant's Response
		the Environmental Statement should be afforded limited weight in the overall planning balance. Drawing together the key findings across topic areas, the planning balance is summarised in the table below, highlighting the relative weight of harms and benefits associated with Sites 8a and 8b.	
SPC-169	Concluding remarks	16.5 Overall planning balance Drawing together the evidence presented across all topic areas, Sites 8a and 8b give rise to multiple, interacting adverse effects. The following table consolidates the key findings from Chapters 5–15, highlighting the relative weight of harms, policy conflicts, and residual uncertainties alongside the limited benefits associated with these sites. This table is intended as a concise reference for decision-makers, showing how the cumulative evidence informs the overall planning balance. Figure 16.5a – Planning balance table Ecology and Biodiversity • Key adverse impacts: Significant risk to barbastelle bats, farmland birds,	A response addressing concerns with sites 8A and Site 8B is provided at SPC-020. The likely significant effects of the Scheme have been assessed within the **Environmental Statement [APP-036** to **APP-195]** and the planning balance considering the likely effects are set out in the **Planning Statement [APP-210]**. In relation to flood risk and hydrological sensitivity, please refer to SPC-083. In relation to impacts on private water supplies, please refer to SPC-088. In relation to impacts on protected species, please refer to SP-066.

ID	Theme	Representation	Applicant's Response
		aquatic species; fragmentation of habitats • Policy conflict/weighting: Habitats Regulations 2017, NPS EN-1 §5.4, NPPF biodiversity protection • Residual uncertainty: Incomplete baseline, unproven mitigation Water Environment and Hydrology • Key adverse impacts: Increased runoff, flood risk, sediment/pollution impacts, effect on private water supplies • Policy conflict/weighting: NPS EN-1 §§4.2, 4.3,5.15; NPPF; Water Framework Directive • Residual uncertainty: No site-specific modelling, partial receptor assessment Private Water Supply and Groundwater • Key adverse impacts: Contamination risk to Market Lane Farm borehole. • Policy conflict/weight: NPS EN-1 §§4.2.5, 4.3.2, 4.3.3, 5.15.8; NPPF	In relation to impacts on designated sites and ancient woodland, please refer to SPC-066, SPC-067 and SPC-072. In relation to landscape and heritage impacts, please refer to SPC-109 to SPC-106. In relation to public rights of way and rural character, please refer to SPC-127. In relation to infrastructure and access constraints, please refer to SPC-135 to SPC-149.

ID	Theme	Representation	Applicant's Response
		• Residual uncertainty: No hydrogeological assessment, deferred investigation Soils and Agricultural Land • Key adverse impacts: Compaction, long-term degradation, loss of Best and Most Versatile land • Policy conflict/weighting: NPS EN-1 §§4.2.5, 4.3.3, 5.15.8; NPPF §§174, 180, 181 • Residual uncertainty: Limited baseline, mitigation uncertain Cultural Heritage • Key adverse impacts: Harm to setting of Shotesham Conservation Area; fragmentation of historic landscape • Policy conflict/weighting: Section 72 Planning (Listed Buildings & Conservation Areas) Act 1990; NPS EN-1 §5.8; NPPF • Residual uncertainty: Partial assessment of setting, mitigation ineffective Landscape and Visual Impact	

ID	Theme	Representation	Applicant's Response
		• Key adverse impacts: Industrialisation, loss of openness, disruption of historic field patterns, long-term visual harm • Policy conflict/weighting: NPS EN-1 §5.10; NPPF • Residual uncertainty: Limited cumulative assessment, mitigation partially effective Transport and Access • Key adverse impacts: Unsuitable roads for HGV/AIL, highway safety risk, severe residual impacts • Policy conflict/weighting: NPS EN-1 §5.14; NPPF §115 • Residual uncertainty: Market Lane omitted, outline mitigation, alternative access unassessed Overall Assessment: The cumulative weight of harms, policy conflicts, and residual uncertainties substantially outweighs any site-specific benefits, particularly given that Sites 8a and 8b are not essential to the delivery of scheme objectives.	

ID	Theme	Representation	Applicant's Response
SPC-170	Concluding remarks	16.6 Overall conclusion Drawing together the evidence presented: • The benefits of the Proposed Development are acknowledged and attract significant weight, but are not dependent on the inclusion of Sites 8a and 8b. • Inclusion of Site 8 results in significant, wide-ranging adverse impacts, policy conflict, reliance on uncertain mitigation, and lack of robust assessment. In these circumstances, the inclusion of Sites 8a and 8b is not justified in planning terms. 16.7. Recommendation to the Examining Authority For the reasons set out above, the Examining Authority is respectfully requested to recommend that: • Development Consent is not granted for Sites 8a and 8b; and • The Order Limits are amended to exclude these areas.	The Applicant's response to the matters raised by Shotesham Parish Council above are summarised herein. The Applicant's **Site Selection Assessment [APP-215]** concludes that the land within the Order Limits, including Sites 8A and 8B, has been identified through a robust process considering environmental, planning and technical constraints, and represents a suitable location for large scale solar generation, having regard to grid capacity, proximity to the point of connection and the availability of willing landowners. The design evolution set out in the **Design Approach Document [APP-212]**, demonstrates how the Applicant has responded to landscape, flood risk, ecological, heritage, and residential considerations at Site 8. Site 8 has been subject to significant constraint-led refinement through the iterative design process and rigorous, evidence-led application of the mitigation hierarchy. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably shows substantial

ID	Theme	Representation	Applicant's Response
		This represents the most appropriate, proportionate, and policy-compliant outcome. We recognise that this objection is lengthy, but the detail reflects the seriousness of our concerns and our commitment to protecting our community, heritage, landscape, and environment. It also reflects the strength of feeling within the village and the passion that local people have for Shotesham, its surrounding countryside, and the conservation of the wildlife and ecology that make this area so special. While prepared by residents rather than planning professionals, we have sought to present the evidence clearly, thoroughly, and in good faith. We trust that the Examining Authority will give careful consideration to this submission and to the concerns of those who know, value, and care for this landscape most closely.	public benefits from providing low-carbon energy to meet the needs identified in NPS EN-1 (arising from all constituent parts of the Scheme, including Site 8) that outweigh any adverse impacts 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. The **Site Selection Assessment [APP-215]** concludes that there are no locations identified within the search area that are more suitable and available than the proposed location for the Scheme, and, in accordance with paragraph 4.3.24 of NPS EN-1, 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.

ID	Theme	Representation	Applicant's Response
			The overall planning balance is set out in the **Planning Statement [APP-209]** which concludes that, having regard to all important and relevant matters, there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made, and that the adverse impacts identified are clearly outweighed by the substantial benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.
Attachment: East Pye Solar DCO Examination-Written Representation. Landscape and Visual Matters – Site 8, Shotesham.			
SPC-171	Introductory comments	Executive Summary This report assesses the suitability of Site 8 within the East Pye Solar Project and considers whether its inclusion within the proposed Order Limits is justified when examined against national policy, local planning policy, environmental constraints and accepted principles of site selection for Nationally Significant Infrastructure Projects (NSIPs).	The Applicant notes the purpose of the report and the conclusions reached regarding Site 8. The landscape and visual effects of Site 8 have been assessed in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**, supporting appendices and figures. The Applicant acknowledges that the Scheme would result in significant landscape and visual effects for certain receptors, as

ID	Theme	Representation	Applicant's Response
		The report recognises the urgent need to decarbonise the UK's energy system and acknowledges the substantial weight that national policy attaches to the delivery of renewable energy infrastructure. However, the National Policy Statements and National Planning Policy Framework make clear that the need for renewable energy does not remove the requirement to avoid, minimise and appropriately balance significant environmental harm. The planning balance must therefore consider not only the benefits of renewable energy generation but also whether development is proposed in an appropriate location and whether less harmful alternatives are available. The evidence presented demonstrates that Site 8 occupies one of the most environmentally and visually sensitive locations within the Scheme. The Site forms an integral component of the Tas Beck valley landscape and contributes significantly to local landscape character, the rural setting of Shotesham, public amenity, ecological connectivity and the appreciation of the wider historic landscape. These characteristics collectively create a highly sensitive	identified in the Applicant's LVIA. However, the Applicant disagrees with the suggestion that the assessment has failed to identify the constraints associated with Site 8 or that the assessment methodology is not robust. The respondent's assessment identifies a greater extent of significant effects than the Applicant's assessment. The Applicant considers that this difference largely arises from methodological approaches adopted by the respondent. The Applicant will provide a full response on the submitted material at Deadline 1. The **Site Selection Assessment [APP-215]** sets out the approach to site selection and the consideration of potentially reasonable alternative sites which adopted, which is proportionate and consistent with national policy. 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 section 2.10 of NPS

ID	Theme	Representation	Applicant's Response
		receiving environment that is poorly suited to large-scale solar development. The assessment identifies substantial adverse effects on landscape character and visual amenity. The Site is highly visible from a number of public viewpoints, including well-used Public Rights of Way, and forms part of a distinctive valley landscape whose openness, tranquillity and rural qualities would be fundamentally altered by the introduction of extensive solar infrastructure. The report concludes that the resulting effects would be significant, long-term and, in many respects, irreversible for the duration of the project. In addition to landscape and visual concerns, the report identifies a range of other constraints affecting the Site. These include ecological sensitivity, hydrological considerations, agricultural land quality, public access impacts and effects on the setting and approach to Shotesham. Whilst each issue is important in its own right, their cumulative interaction substantially increases the overall level of harm associated with development of the Site.	EN-3, and the Applicant considers that it has demonstrated compliance with the relevant site selection criteria set out in NPS EN-1, NPS EN-3 and NPS EN-5. The sites selected for the Scheme have been subject to detailed assessment within the **ES [APP-036 to APP-195]**. The overall planning balance, with consideration of the likely effects from the Scheme, is set out within the **Planning Statement [APP-209]**. 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 Applicant therefore considers that the sites selected have been subject to a robust and transparent process of environmental assessment which verifies their suitability for the Scheme.

ID	Theme	Representation	Applicant's Response
		A key finding of the report concerns the robustness of the site selection process. The evidence suggests that the constraints affecting Site 8 were either underestimated or insufficiently reflected within the alternatives assessment process. Furthermore, changes to the Point of Connection appear not to have been accompanied by a comprehensive reassessment of site suitability. As a result, the justification for retaining Site 8 within the Order Limits is considered weak when compared with the scale and significance of the identified environmental effects. The report also concludes that the cumulative effects of the wider Scheme have not been fully reflected within the Environmental Statement. When assessed alongside other elements of the proposed development, the contribution of Site 8 to cumulative landscape, visual, ecological and community impacts becomes more pronounced, further strengthening the case for its exclusion.	
SPC-172	Introductory comments	Overall, the evidence indicates that Site 8 is a highly constrained and environmentally sensitive location where	The respondent has concluded that Site 8 is located within a Valued Landscape. The Applicant disagrees with this conclusion. In

ID	Theme	Representation	Applicant's Response
		significant adverse effects would arise that cannot be adequately mitigated through design refinement, landscaping or operational measures. While the wider objectives of renewable energy generation are supported, the inclusion of Site 8 is not considered necessary to achieve those objectives and would result in disproportionate harm when measured against the benefits delivered. Accordingly, this report concludes that Site 8 should be removed from the East Pye Solar Project Order Limits. Such an outcome would better accord with the requirements of NPS EN-1, NPS EN-3, the National Planning Policy Framework, the Greater Norwich Local Plan and South Norfolk Development Management Policies, whilst avoiding significant and unnecessary harm to a Valued Landscape and its associated environmental, community and heritage assets.	accordance with Landscape Institute Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations (LI, 2021), landscape value should be assessed with reference to a range of factors, including natural heritage, cultural heritage, landscape condition, associations, distinctiveness, recreation, perceptual qualities and functional value. The Site does not lie within a National Landscape or a locally designated landscape. It is partially located within an area covered by Local Policy DM 4.5, which places regard on protecting the distinctive characteristics, special qualities and geographical extent of Rural River Valleys. The Site exhibits some characteristics typical of LCA A1 Tas Rural River Valley and LCA B1 Tas Tributary Farmland. However, as it is located within a transitional landscape between the two character areas, the characteristics are not particularly clear or distinctive. The Site displays the "moderately wide simple valley form" and a "feeling of exposure and openness" associated with LCA A1, while the upper part of the valley displays the "open, gently undulating to flat and sloping landscape incised by shallow

ID	Theme	Representation	Applicant's Response
			tributary valleys" characteristic of LCA B1. However, the area does not display other key characteristics, such as "attractive fords and small bridges" or the "presence of historic earthworks". The rarity of the Site is considered low, as it does not contain features or elements that are uncommon within the wider landscape. Although the Site demonstrates a moderate level of intactness, the condition of individual landscape elements is highly variable. Boundary vegetation is fragmented in places, with gaps in hedgerows and only a few scattered mature trees. Overall, the Site does not exhibit particularly high scenic quality, although there are some longer-distance views across the valley from footpaths located on the elevated valley sides. Several blocks of ancient woodland are located at the bottom of the valley, including Ringer's Grove and Little Wood. These create a more enclosed character within parts of the valley and around the ancient woodlands, which does not display the long-distance views that are characteristic of the wider landscape character area. The Site is crossed by a network of Public Rights of Way, and the Boudicca Way passes

ID	Theme	Representation	Applicant's Response
			to the west of the Site; therefore, it displays some recreational value. The landscape is largely characterised by small to medium-scale arable agriculture. These characteristics are typical of the region and are not unique. There is an SSSI located to the north-west of the Site and a Roadside Nature reserve on the margin of Sub-Site 8A; however, there are no notable features of wildlife, earth science, archaeological, historical or cultural interest within the Site itself. The Site is not considered wild, but it is considered tranquil in character, with few built form or infrastructure visible. The Site does not have any known association with particular people, such as artists or writers, or events in history that contribute to perceptions of the natural beauty of the area. Overall, the Applicant does not consider the Site does not exhibit the combination of attributes that would constitute a Valued Landscape, and the Applicant draws attention to that policy compliance with the NPPF, including paragraph 187 relating to protecting and enhancing valued landscapes, is

ID	Theme	Representation	Applicant's Response
			addressed in the **Policy Compliance Document [APP-210]**. 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 notes the constraints at Site 8. The design evolution of the Scheme in respect of landscape and visual context is set out in the **Design Approach Document [APP-212]**. In the case of Site 8, this includes fields retained for agricultural use in both Sub-Site 8A and 8B and the solar PV is completely removed from LCA A1 Tas Rural River Valley in response to the sensitivity of the landscape. 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.

ID	Theme	Representation	Applicant's Response
			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.

2.16 Tharston Parish Council

Table 2.16 Applicant's Response to Tharston and Hapton Parish Council [RR-1915]

ID	Theme	Representation	Applicant's Response
THPC-001	Sentiment	We oppose the project and would like to submit reports from the parish council when consultations allow.	The Applicant notes this comment and welcomes further engagement with Tharston and Hapton Parish Council during and beyond the Examination process.
THPC-002	Examination process	Tharston and Hapton Parish Council is seriously concerned about the possibility that the amount of time that will be made available during the Examination period of this NSIP application for the preparation of its full written representation will be insufficient. The number of documents that must be studied and evaluated within this large application is huge.	The Applicant notes Tharston and Hapton Parish Council's concerns regarding the Examination timetable and the resources available to voluntary bodies. The setting of the Examination timetable is a matter for the Examining Authority. Interested Parties can raise comments on the draft Examination timetable **[PD-005]** to the Examining Authority at Procedural Deadline A and at the Preliminary Meeting.
THPC-003	Examination process	It is essential that the examination timetable provides parish councils and voluntary organisations with enough time to research and prepare a thorough and full written representation. Unlike the applicant we cannot afford to hire a wide range of experts to prepare our documentation, papers and maps. We rely on the voluntary efforts of	

ID	Theme	Representation	Applicant's Response
		councillors and others to prepare our case and it will take these volunteers a considerable amount of time to undertake this enormous task.	
THPC-004	Examination process	The Examination timetable will presumably be set out after the closure of the registration period on June 10th. Please ask the Inspectors to schedule a deadline date for the submission of written representations that at least provides us with a 4 to 5 month period (after June 10th) to prepare our submission - especially as this period will include the Summer holiday months of July and August.	

2.17 Tibenham Parish Council

Table 2.17 Applicant's Response to Tibenham Parish Council [RR-1937]

ID	Theme	Representation	Applicant's Response
TiPC-001	Cumulative Schemes, In-Combination and Impact	I am writing on behalf of the parish council. There are too many of these proposed schemes happening around South Norfolk, there seems to be no 'joined up' thinking, and many individual companies vying for the contracts.	The Applicant notes Tibenham Parish Council's concerns regarding cumulative effects of multiple energy schemes in South Norfolk. 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 in-combination with other existing and/or approved developments on the receptors identified within the ES. The Applicant acknowledges the need for early co-ordination between developers, local authorities and agencies involved in other NSIPs and large-scale developments across Norfolk and the wider region (inclusive of Suffolk). The Applicant will, where feasible, continue to co-ordinate with other projects and relevant stakeholders to understand and, where possible, manage cumulative accommodation and labour market pressures arising from the delivery of major infrastructure

ID	Theme	Representation	Applicant's Response
			schemes. The Applicant will be submitting a DCO Interrelationship Report into the Examination.
TiPC-002	Soils and Agriculture	East Pye solar farm will cover a huge area of farmland, which is needed for growing food.	The Applicant notes the Parish Council's concerns regarding loss of farmland used for food production. Effects on agricultural land are assessed in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**, supported by **ES Volume 3, Appendix 15.1 – Agricultural Land Classification [APP-182]** and **ES Volume 3, Appendix 15.2 – Farm Reports [APP-183]**. The Scheme is temporary and reversible, with the land beneath and between arrays capable of continued agricultural use including sheep grazing. Soil management and land restoration are secured through the **Outline SRMP [APP-204]** and the **Outline DEMP [APP-198]**, both secured by Requirements in Schedule 2 of the **Draft DCO [AS-032]**.
TiPC-003	The Applicant	These projects, and East Pye is no different, is all about making money, under the guise of 'net zero'.	The needs case for the Scheme as supported by national policy, including the contribution to national decarbonisation and Clean Power 2030 targets, is set out in the **Statement of Need [APP-206].** The principle of the development is further set out in the **Planning Statement [APP-209]**.

ID	Theme	Representation	Applicant's Response
TiPC-004	Site Selection, Alternatives and Design Evolution	Solar panels need to be placed on all the roofs of industrial buildings, offices, supermarkets and schools, before covering agricultural land. Battery storage can be added to those buildings, and they then become self-sufficient. Solar is not the only way forward, due to it's very nature.	The **Statement of Need [APP-206]** sets out the national and regional need for utility-scale ground-mounted solar generation. As set out within the Statement of Need, rooftop solar is complementary to, rather than a substitute for, utility-scale ground-mounted solar in meeting the Clean Power 2030 targets. Site selection is documented in the **Site Selection Assessment [APP-215]** and **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**.
TiPC-005	Human Health Ecology and Biodiversity	The East Pye development will have a negative impact on the residents, wildlife and environment for many miles radius around the site.	Effects on species and habitats have been assessed within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]**. Visual, noise, and air quality effects on nearby residential dwellings have been assessed within **ES Chapter 14 – Socio-Economics [APP-050]**, **ES Chapter 12 – Noise and Vibration [APP-048]**, and **ES Chapter 13 – Air Quality [APP-049]**. The conclusions of these assessments are set out within **ES Chapter 20 – Summary of Residual Significant Effects [APP-056]**.
TiPC-006	Human health	Mental health will suffer, traffic and pollution will increase,	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

ID	Theme	Representation	Applicant's Response
			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], Outline OTMP [APP-202], Outline LEMP [APP-199]** and **Outline ESSC [APP-205]**. **ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [APP-180]** presents the construction dust risk assessment and an assessment from traffic on air quality from construction and decommissioning is presented in **ES Volume 1, Chapter 13 – Air Quality [APP-049]**. Mitigation and control measures for dust and vehicle emissions are provided in the **Outline CEMP [APP-196]** and **Outline OEMP [APP-197]**. In accordance with Requirements 13 and 14 of the **Draft DCO [AS-032]**, detailed CEMP and OEMP will be submitted to and approved by the relevant planning authority.
TiPC-007	Arboriculture	devastation to ancient, established hedgerows and trees,	The findings of the tree survey 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.

ID	Theme	Representation	Applicant's Response
			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]**. 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]**. 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

ID	Theme	Representation	Applicant's Response
			the long-term management of the landscape and ecological measures are provided in the **Outline LEMP [APP-199]**.
TiPC-008	Lighting Noise and Vibration	light and noise pollution in areas that are currently free from those.	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 approach to lighting is set out in **ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151], Outline CEMP [APP-196]** and **Outline OEMP [APP-197]**, together with th**e Design Principles, Parameters and Commitments [APP-213]**. Detailed plans are secured through the Requirements in the **Draft DCO [AS-032]**. 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.

ID	Theme	Representation	Applicant's Response
			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 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.
TiPC-009	Socio-Economics	Tourism and businesses will be negatively impacted. It is vital that all objections are listened to.	**ES Volume 1, Chapter 14 - Socio-Economics [APP-050]** incudes an assessment on local tourism assets. It concludes that during the Construction Phase there will be a Minor Adverse effect on the Tourism Industry, reflecting: the potential for disruption but also the potential for some beneficial effects relating to workforce expenditure. There is also a Minor Adverse effect during the Operation and Maintenance Phase,

ID	Theme	Representation	Applicant's Response
			relating to the potential for visual amenity and glint and glare effects. Effects on Jobs, Employment, and the Supply Chain were identified as positive for a range of effects during all Phases; significantly, these include a Major Beneficial effect on workplace-based employment in South Norfolk during Construction and Moderate Beneficial effects on skills in South Norfolk during both the Construction and Operation and Maintenance Phases. Measures incorporated into the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]**, **Outline PRoWPPMP [APP-203]**, **Outline CTMP [APP-201]** and **Outline OTMP [APP-202]** will mitigate impacts on the environment as far as practicable.

2.18 Tivetshall Parish Council

Table 2.18 Applicant's Response to Tivetshall Parish Council [RR-1951]

ID	Theme	Representation	Applicant's Response
TPC-001	General remarks	We have registered so we can reply and attend any hearings on east Pye Solar scheme when necessary.	The Applicant welcomes that Tivetshall Parish Council has registered as an Interested Party.
TPC-002	Cultural Heritage	The Tivetshalls is a linear style rural parish – homes are generally situated along roads with open farmland to the rear. Historic England records thirty four listed in Tivetshall parish with the Church of St Margaret Grade 1.	The Applicant agrees with this statement.
TPC-003	Transport and Access	The parish is mainly made up of small rural roads. No detailed routes have been specified in the project.	Construction vehicle route descriptions are detailed in **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **APP-177]** and in the **Outline CTMP [APP-201]**. The proposed access strategy has been designed and developed in consultation with Norfolk County Council (NCC) as the Local Highway Authority. The **Outline CTMP [APP-201]** also sets out Highway Works and mitigation measures 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

ID	Theme	Representation	Applicant's Response
			with the relevant planning authority that must consult with the relevant highway authority The **Outline OTMP [APP-202]** describes that the construction routes should be considered for the replacement activities during the operation phase. During regular maintenance, movements will be infrequent and generally undertaken by smaller vehicles. As such, specific routes do not need to be defined.
TPC-004	Statement of Need Climate Change	The Tivetshalls parish council acknowledges there is a need to protect the planet from climate change. Support was given to a 50mw solar site application in 2025. Studying the East Pye project DCO gives us grave concerns on the viability. Mostly due to inaccuracies and a lack of detail to significant issues. This also makes it difficult for residents to understand or comment on the impact to them. Land sites 2A, B and C are the proposed locations for solar panels, a BESS and a 400kv Sub Station.	The Applicant notes Tivetshall Parish Council's acknowledgement of the need to address climate change. The **Funding Statement [APP-021]** demonstrates that the Scheme is financially viable and adequately funded for the Scheme to be delivered in full. The likely effects of the Scheme during the construction, operation and decommissioning phases are assessed in the **ES [APP-036** to **APP-195]**, including in relation to Sub-Sites 2A, 2B and Sub-Site 2C, together with the BESS and Project Substation within the BESS Site. The spatial extent of the Scheme is shown on the **Works Plan [AS-002** and **AS-003]** and a description of the Works Plan in Schedule 1 of the **Draft DCO [AS-032]**. The framework for managing environmental effects of the Scheme during the construction, operation

ID	Theme	Representation	Applicant's Response
			and decommissioning phases are secured through various outline management plans **[APP-196** to **APP-205]**. The management plans will ensure that impacts are kept to a minimum. The detailed management plans, which will be substantially in accordance with the outline management 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 the detailed management plans is secured by the Requirements in the **Draft DCO [AS-032]**.
TPC-005	Planning, Policy Compliance	The parish council believes any project should be planning led in line with EN-3. This project appears landowner-led. The Applicant has failed to justify the use of BMV land. The Solar, cable corridors, BESS and 400kv Sub Station should not be assessed in isolation.	Policy compliance and the planning balance for the Scheme is set out in the **Planning Statement [APP-209]** and **Policy Compliance Document [APP-210]**. The Planning Statement provides an appraisal of the Scheme against the legislative framework and the relevant policy, including in relation to NPS EN-1, NPS EN-3 and NPS EN-5. The Planning Statement demonstrates the Scheme's compliance with national policy and provides justification of using BMV land. 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. These constraints have been informed by national policy on factors

ID	Theme	Representation	Applicant's Response
			relevant to site as set out within NPS EN-1 and EN-3. In particular, Section 4 of the **Site Selection Assessment [APP-215]** describes the consideration of the factors identified in NPS EN-3 in relation to the site selection process. 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. Land availability (i.e. the participation, or willingness of landowners) is a key consideration for site selection, as the Applicant intends to avoid compulsory acquisition as far as practicable. The likely effects of the Scheme as a whole, which includes the 132kV and 400kV Project Substations, National Grid Substation, Solar PV Sites and the Cable Route Corridor (CRC) as shown on the **Works Plan [AS-002** and **AS-003]** have been assessed in the **ES [APP-036** to **APP-195]**. This includes the assessment in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]** of economic and other benefits of the use of BMV land in accordance with NPS EN-3 and the NPPF.
TPC-006	Construction and Decommissioning	The National Grid Substation and grid connection infrastructure would not be decommissioned in 40-60 years in the	As set out in the **Outline DEMP [APP-198]**, the National Grid Substation and the Grid Connection Infrastructure would remain in situ, following

ID	Theme	Representation	Applicant's Response
		same way as the proposed solar structures.	decommissioning of the remainder of the Scheme. The management of the National Grid Substation will be the responsibility of National Grid Electricity Transmission.
TPC-007	Traffic and Access	The assessment should not treat Site 2A, B and C construction traffic, BESS construction traffic, substation traffic, cable-route traffic and access-track works as isolated impacts. Local roads will experience the combined effect.	The Applicant refers to the response under TPC-004. In addition, an assessment of traffic from the Scheme is provided in **ES Volume 1, Chapter 11 - Transport and Access [APP-047]** and includes an assessment of cumulative effects in Section 11.11. Combined effects associated with the Scheme, such as the construction traffic generated for Sites 1 and 2 on the highway network, have been accounted for and are assessed within Section 11.8 of the **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**. Percentage change on each highway link has been included and assessed in alignment with industry-standard IEMA Guidance. For the purposes of assessing a reasonable worst-case scenario, it has been assumed that all construction activity will occur simultaneously. In reality, activities will be staggered across the duration of the construction programme. Trip distributions for peak daily construction vehicles are shown in **ES Volume 1, Chapter 11 -**

ID	Theme	Representation	Applicant's Response
			Transport and Access [APP-047]. The assessment aligns with the access strategy and construction vehicle routeing has been developed in consultation with NCC as the Local Highway Authority. Mitigation and management measures, which take into account the anticipated traffic generated by the Scheme, are described in the **Outline CTMP [APP-201]** and **Outline OTMP [APP-202].** Furthermore, the proposed access strategy has been designed and developed in consultation with the Local Highway Authority.
TPC-008	Landscape and Visual	Current Environment – The Tivetshalls is identified as Great Moulton Plateau Farmland and Waveney Tributary Farmland. Tivetshall residents and visitors value the tranquillity and the special qualities of the two landscape types. The richness and intrinsic value of living within the countryside and amongst its natural fauna and flora. The EPS project Land site 2A, B and C in The Tivetshalls will be on the Great Moulton Plateau Farmland. The higher ground is a large-scale open landscape with some distant views. Predominantly high yield arable farmland with varied field pattern. It contains mature	The Applicant notes the response and considers that **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]** has been undertaken in accordance with the appropriate guidelines, as required by paragraph 2.10.89 of EN-3 and is a robust and appropriate assessment of the Scheme. An iterative design process and Green Infrastructure Strategy has considered landscape and visual amenity, as described in the **Design Approach Document [APP-212]** and presented in the **Green Infrastructure Strategy [AS-005]**. The design of the Scheme has been informed by an environmentally led approach, with landscape and visual considerations embedded into the design principles, design buffers and design

ID	Theme	Representation	Applicant's Response
		hedgerows with trees, especially large mature oaks, includes ancient meadows all providing natural habitat. The Tivetshalls enjoys dark skies. It was a prominent subject of the Neighbourhood Plan (adopted 2022). Policy TIV13 states "In new developments, lighting necessary for security, or safety should be designed to minimise the impact on dark skies by, for example, minimal light spillage, use of downlighting and restricting hours of lighting." The Parish Council is very concerned the Landscape assessment recognises major/significant impact of the National Grid and 400kv Sub stations but understates the impact. EN-3 requires the landscape and visual impacts to be considered carefully.	evolution, as set out in the **Design Approach Document [APP-212]**. The mitigation hierarchy has been applied to the Scheme including the National Grid and 400kv Sub stations, to avoid, reduce or mitigate for potential significant environmental effects identified throughout 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]**. **ES Volume 3, Appendix 7.11 – Lighting Strategy [APP-151]** includes measures 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. The control of lighting is secured in the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**. Policy compliance of the Scheme is set out in the **Planning Statement [APP-209]** and **Policy Compliance Document [APP-210]**, which includes an appraisal against Tivetshall Neighbourhood Plan.
TPC-009	Soils and Agriculture	The result will be permanent loss of food producing agricultural fields and the landscape – views of the parish	An assessment of the effects of the Scheme on agricultural businesses and wider food production is provided in **ES Volume 1, Chapter 15 – Soils**

ID	Theme	Representation	Applicant's Response
	Landscape and Visual	boundary historic Hundred Way with its ancient trees and hedging will be lost. Instead, the view will be substations, fencing, access routes, CCTV, lighting, vehicles.	**and Agricultural Land [APP-051]**, where no significant effects have been identified. An assessment of PRoW and permissive paths, including Hundred Lane / PRoW Great Moulton RB19 has been undertaken, as described in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Furthermore, a PRoW Visual Amenity Assessment is included in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149].** The assessment considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources. Mitigation and management measures are given in the outline management plans, including the **Outline PRoWPPMP [APP-203]**. The PRoW management measures will be developed further in the detailed PRoWPPMP to be secured by Requirement 17 of the **Draft DCO [AS-032]**.
TPC-010	Construction and Decommissioning	Increased physical human activity during construction and ongoing maintenance at the sites.	The likely effects of the Scheme during the construction, operation (including replacement activities and maintenance) and decommissioning phases are assessed in the **ES [APP-036** to **APP-195].** This includes an assessment on human health in **ES Volume 1, Chapter 18 – Other Environmental Matters [APP-054]**.

ID	Theme	Representation	Applicant's Response
			The framework for managing environmental effects of the Scheme during the construction, operation and decommissioning phases are secured through various outline management plans **[APP-196** to **APP-205]**. The management plans will ensure that impacts are kept to a minimum. The detailed management plans, which will be substantially in accordance with the outline management 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 the detailed management plans is secured by the Requirements in the **Draft DCO [AS-032]**.
TPC-011	Lighting Ecology	Dark skies will be affected by site lighting. This will cause disturbance or risk to the abundant wildlife.	**ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** includes an assessment of lighting from the Scheme on important ecological features; including light sensitive species such as bats. Following the implementation of embedded mitigation, the assessment concludes no likely significant effects from lighting. Controls around lighting are set out in the **Lighting Strategy [APP-151]** and secured through the **Outline CEMP [APP-196]** for the construction phase. This includes avoidance of extensive night-time working, lighting to be positioned to ensure that light is directed onto the area of works only

ID	Theme	Representation	Applicant's Response
			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. Lighting controls for the operational phase are 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]** sets out the mitigation 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.
TPC-012	Landscape and Visual	A massive change to the views and use of the land from agriculture and leisure access to industrial energy production. There is no detail on mitigation.	A detailed landscape and visual assessment is included in **ES Volume 1, Chapter 7 - Landscape and Visual [APP-043]**. Further, a visual amenity assessment of PRoW is present in **ES Volume 3, Appendix 7.9 - Public Right of Way Visual Amenity Assessment [APP-149]**. 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 management plans will

ID	Theme	Representation	Applicant's Response
			ensure that impacts are kept to a minimum. 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. The **Green Infrastructure Strategy [AS-005]** includes planting 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]**. 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. The Applicant is also committed to the provision of new permissive paths and community accessible space, as set out in the **Design Principles, Parameters and Commitments [APP-213]** and **Outline LEMP [APP-199]**.

ID	Theme	Representation	Applicant's Response
TPC-013	Water Environment – Water Quality, Drainage and Flood Risk	Homes, farmland and river tributaries– there is no consideration of the development exacerbating surface water drainage issues on land and homes as well as the risks of contamination to the underground water sources. There needs to be tighter scrutiny of the impact on soil, drainage of land sites 2A, B and C as well as the access roads and cable corridors.	The Applicant has committed to providing a surface water drainage system for the impermeable areas for the Scheme. These drainage systems will include attenuation (design 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]**. The outline drainage strategy is set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018]** with details of the surface water drainage scheme to be submitted to and approved by the relevant planning authority, as secured by Requirement 11 of the **Draft DCO [AS-032].** As set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018]**, Solar PV Panels in Sub-Sites 2A, 2B and 2C will be raised up on narrow pile-driven supports which have a negligible impermeable area and will allow overland flows to flow beneath. Sensitive electrical equipment associated with the Solar PV Panels is set at the top of the narrow support that the panel sits on and would therefore have significant freeboard above ground level and anticipated surface water flood depths.

ID	Theme	Representation	Applicant's Response
			The **Design Principles, Parameters and Commitments [APP-213]** states that "*The lowest edge of the Solar PV Panels will be set at a minimum of 0.4m above ground level. Where Solar PV Panels are situated in areas of 'low' to 'high' surface water flood risk, the Solar PV Panels will be raised higher where practicable, or the use of Single Axis Tracker panels will be considered.*" For the internal access tracks, whilst these will be designed to be permeable, further drainage features such as swales and filter drains will also be incorporated parallel to or downhill of the tracks depending on topography. Depending on the slope, swales will include check dams to prevent the rapid transfer of water downslope. Where access tracks are located in areas of Flood Zones 2 or 3 and/or significant 'low' to 'high surface water flow routes/flood risk areas, access tracks will be kept at existing ground level so as to not impeded floodplain storage or flood flow routes. These commitments are secured through the **Design Principles, Parameters and Commitments [APP-213]**. Embedded pollution management measures for all phases of the Scheme are set out and secured within the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**.

ID	Theme	Representation	Applicant's Response
TPC-014	Water Environment – Water Resources, Water Demand and Supply BESS Safety	The BESS is of great safety concern. The project identifies a fire-water facility. It does not include any inspections by the Fire Service during the lifetime of the project to ensure ongoing compliance with safety standards. There is no protection of ground water supplies in the event of a fire requiring water cooling control.	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 and operational maintenance. The **Outline BSMP [APP-200]** covers all key BESS failure safety issues, namely fire risks, explosion risks, and fire emission risks. The **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. The BESS is designed to have a permeable surface with underlying aggregate sub-base. The sub-base system will be lined with an impermeable membrane to prevent the infiltration of runoff from the sub-base to the strata below. In the event of a fire, a system of automatically self-actuating valves at the surface water drainage outfall(s) from the BESS area will be closed (with manual override provided as a secondary control), isolating the BESS area drainage system from the wider environment. Where contamination is identified, the retained water will be removed from site by tanker and transported to an appropriately permitted facility for treatment and disposal.

ID	Theme	Representation	Applicant's Response
			Further details are provided in the **Outline BSMP [APP-200]**.
TPC-015	Transport and Access	Commuting – Roads within the parish are one B road, four dual width and the remainder single track. The nature of the roadways is important to the rural character and it can result in road safety issues. For work, senior school, further education and shopping residents have to travel outside the village. The Tivetshalls is equidistant of Norwich and Ipswich.	During the design process, consideration was given to the most suitable access routes. Factors considered are set out in **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**, which includes the internalisation of construction haul routes, where possible, to minimise impacts. Measures also include the use of a vehicle booking system and vehicle holding areas to proactively manage construction vehicle movements to site and ensure impacts on the rural and local road network is reduced where practicable, as described in the **Outline CTMP [APP-201].** The proposed access strategy has been designed and developed in consultation with the Loca Highway Authority. Highway Works will support the safe movement of construction vehicles along narrower sections of the local road network and reduce potential disruption to the public highway. The Highway Works will contain localised improvements to deteriorated road edges or temporary highway and traffic works. Highway Works that have provisionally been identified where the AIL may overrun or oversail are identified in the **Outline CTMP [APP-201]**, along with the likely and suitable access routes to the Scheme. Site access

ID	Theme	Representation	Applicant's Response
			design, vehicle tracking and swept-path analysis has also been undertaken to assess the suitability of access as included in **Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **APP-177]**.
TPC-016	Transport and Access	Local agricultural vehicles are on the roads to access fields, farms and the Maltings and processing factories throughout the year. Land sites 2A, B and C are in the immediate vicinity of the existing rural roads from homes to the B1134 and A140. The EPS project will add many more vehicles. As well as passenger vehicles for construction and maintenance workers they will include HGV and AIV. The larger vehicles are completely incompatible with the width and construction of the majority of the roads in the parish. B1134 has been identified for changes but no detail on the specific properties (homes) or fields involved. The figures and times given for existing traffic - Bus times and routes; peak travel times - are incomplete, incorrect or misleading. Listed impact in the DCO as 'negligible'.	As part of the assessment in **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, baseline data was collected in the form of Automatic Traffic Count (ATC) and Manual Classified Count (MCC) surveys, alongside Department for Transport and Manual Count Point (MCP) data and National Highways WebTRIS data. The ATC and MCC data were commissioned for a period of one week and is a standard industry approach to assessing transport flows. Bus routes have also been considered and are included in the baseline assessment within **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**. Sensitive receptors such as residential properties have been considered within **ES Volume 1 Chapter 11 - Transport and Access [APP-047].** This has informed the access strategy which has been prepared in consultation with the Local Highway Authority. As detailed in the **Outline CTMP [APP-201]**, construction vehicles are proposed to access Sub-Sites 2A, 2B and 2C directly from A140, making

ID	Theme	Representation	Applicant's Response
			use of existing laybys and including appropriate management and mitigation measures such as restricting construction traffic movements on A140 to left-in/left-out only. As detailed in **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, the percentage change on the B1134 from forecast construction traffic movements is 3% or 7% for HGV movements. For A140 south of B1134 roundabout, the percentage change is 1% or 2% for HGV movements. These percentage changes do not exceed IEMA thresholds requiring additional assessment. The two rules set out in IEMA Guidance state that additional assessment should be undertaken where the predicted increase in traffic flows on a link is either more than 30%, or more than 10% on links classed as having receptors with high sensitivity. The Applicant therefore considers that the likely significant effect on these links with regards to traffic and transport is not significant. Based on the responses above, the Applicant considers the assessment of traffic flows and impact as robust.
TPC-017	Transport and Access	Work and School Government guidance encourages provision for high quality	There will be no permanent or long-term closures of PRoW as a result of the Scheme. The temporary

ID	Theme	Representation	Applicant's Response
		walking and cycling networks which can and are used for commuting to work and school as well as for recreation. These should be safe secure and attractive. East Pye project Land site 2A. B and C locations encompass many of these routes. No detailed routes have been specified in the project.	closures of PRoW during construction are listed in the **Outline PRoWPPMP [APP-203]**, together with mitigation and management measures. A plan showing the location of temporary PRoW closures during the construction phase is shown in the **Access and Public Rights of Way Plan [APP-011]**. A detailed PRoWPPMP will be submitted to and approved by the relevant planning authority in accordance with Requirement 17 of the **Draft DCO [AS-032]**. The detailed PRoWPPMP will be substantially in accordance with the management and mitigation measures set out in the **Outline PRoWPPMP [APP-203]**, including the provision of permissive paths to maintain accessibility to key PRoW routes. A 15m buffer to PRoW has been incorporated into the design of the Scheme, as secured through the **Design Principles, Parameters and Commitments [APP-213]**. The Applicant is also committed to the provision of new permissive paths and community accessible space within the Scheme, as set out in the **Design Principles, Parameters and Commitments [APP-213]** and **Outline LEMP [APP-199]**.
TPC-018	Transport and Access	Local Economy, Agricultural - vehicles travel throughout the year due to the varied crops grown on the high quality land.	As part of the assessment in **ES Volume 1, Chapter 11 - Transport and Access [APP-047]**, baseline data was collected in the form of ATC and MCC surveys, alongside Department for Transport

ID	Theme	Representation	Applicant's Response
		Predominantly high yield arable farmland with varied field pattern.	and MCP data and National Highways WebTRIS data. The ATC and MCC data were commissioned for a period of one week and is a standard industry approach to assessing transport flows. Existing agricultural traffic flows have been captured within these surveys and have been considered within the assessment.
TPC-019	Socio-Economics PRoW	Hospitality - succeeds due only to the current tranquil rural PROWs and their immediate environment. Visitors come for walking, cycling, partaking wildlife, flora and scenic photography. To relax and recover from living in more built-up areas, to explore the history. During construction over 3 years these activities will be severely curtailed by extra traffic including HGV and AIVs. Thereafter boundary fencing, security lighting, maintenance work and associated traffic, battery and inverter noise will create an area which is unsuited to leisure. No detailed routes have been specified in the project.	A 15m buffer to PRoW has been incorporated into the design of the Scheme, as secured through the **Design Principles, Parameters and Commitments [APP-213]**. The Applicant is also committed to the provision of new permissive paths and community accessible space within the Scheme, as set out in the **Design Principles, Parameters and Commitments [APP-213]** and **Outline LEMP [APP-199]**. The construction of the Scheme is anticipated to commence in 2028 for a period of approximately 24 months. The likely effects of the Scheme during the construction, operation and decommissioning phases are assessed in the **ES [APP-036** to **APP-195]**. The framework for managing environmental effects is secured through various outline management plans **[APP-196** to **APP-205]**. The detailed management plans, which will be substantially in accordance with the outline management plans, will be submitted to and approved by the relevant planning authority, in

ID	Theme	Representation	Applicant's Response
			consultation with relevant statutory consultee, where specified in the requirements of the **Draft DCO [AS-032]**. Within **ES Volume 1, Chapter 11 - Traffic and Access [APP-043]** and **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **APP-177]** an assessment of the Scheme on traffic and access is presented, with the proposed construction routes and access points shown in the **Outline CTMP [APP-201]**. The assessment concludes that, with the management and mitigation in place, effects relating to transport and access would not be significant. The assessment is aligned with industry-standard IEMA Guidance, sets out thresholds and assessments for effects relating to severance, delay, non-motorised users, fear and intimidation, road safety, and hazardous and large loads. Mitigation measures and management of traffic and access are set out in the **Outline CTMP [APP-201]** and **Outline OTMP [APP-202]** and the proposed management of PRoW is described in **Outline PRoWPPMP [APP-203]** to minimise impacts as far as practicable. Detailed CTMP, OTMP and PRoWPPMP 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]**.

ID	Theme	Representation	Applicant's Response
			The ES includes **ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** that provides an assessment on local tourism assets. The sensitivity of the tourism industry receptor is assessed as Medium, reflecting that the share of South Norfolk's employment in tourism is comparable to the regional level. No likely significant effect has been identified for the construction phase, based on: • There being no known tourist assets within the Order Limits with the exception of a limited area of the Pulham Patch activity farm, for which any losses incurred by will be addressed through an agreed compensation arrangement; and • The potential for disruption during construction, but the countervailing potential for additional expenditure by the workforce to benefit the tourism industry.
TPC-020	PRoW	The Parish Council on behalf of residents works to protect and enhance the green and open character of the parish. The PROWs (Footpaths, Bridleways and Byways) do not completely link and users cross or travel along the highways and Quiet Lanes. Walking, cycling, horse riding, photography and observance/recording	The Applicant refers to the response under reference code TPC-019 which addresses matters including safe routes through the parish. An **Equality Impact Assessment [APP-214]** has been undertaken that has considered the effects of changes to connectivity as a result of changes to PRoW. In addition, a detailed landscape and visual assessment is reported in **ES Volume 1, Chapter**

ID	Theme	Representation	Applicant's Response
		of birds, mammals and plants are popular leisure activities for residents and visitors. The current tranquillity of the PROWs is invaluable to physical and mental health. It is vital to retain existing safe and integrated routes throughout the parish. No detailed routes have been specified in the project.	**7 - Landscape and Visual [APP-043]** with a visual amenity assessment of Public Rights of Way in **ES Volume 3, Appendix 7.9 [APP-149].** Tranquillity forms part of the landscape baseline presented in **ES Volume 3**, **Appendix 7.2 – Landscape Baseline [APP-119]**. The Applicant is also committed to the provision of new permissive paths and community accessible space within the Scheme, as set out in the **Design Principles, Parameters and Commitments [APP-213]** and **Outline LEMP [APP-199]**. The **Outline PRoWPPMP [APP-203]** includes mitigation and management measures for PRoW. A detailed PRoWPPMP will be submitted to and approved by the relevant planning authority in accordance with Requirement 17 of the **Draft DCO [AS-032]**.
TPC-021	Battery Safety	BESS-specific safety, lighting, fire-water and emergency access parameters need checking. Has the BESS been assessed against worst-case fire, smoke plume, contaminated fire-water runoff, emergency access, separation distances, water supply, lighting, CCTV, noise, fencing, drainage and ecological receptors?	The parameters for the BESS are defined in the **Design Parameters, Principles and Commitment [APP-213]** and the **Works Plan [AS-002** and **AS-003**], with an illustrative layout of the BESS included in the **Outline BSMP [APP-200]**. 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 **Outline BSMP [APP-200]** also describes the proposed drainage

ID	Theme	Representation	Applicant's Response
		Has the assessment considered cumulative risk from the BESS, substations, pylons, access roads and nearby residential/public receptors together?	system for the BESS, taking into account the management of contaminated fire water. Further, the **Outline BSMP [APP-200]** includes a Plume Study, which assesses the battery fire emission impacts on air quality at six worst case fire locations on sensitive receptors within a 1km radius of the BESS Site. A detailed BSMP will be submitted to and approved by the relevant planning authority in accordance with Requirement 6 of the **Draft DCO [AS-032]**. The assessments within the **ES [APP-036** to **APP-195]** has considered all components of the Scheme as a whole, including the National Grid Substation and Grid Connection Infrastructure, the Project Substations and the BESS, together with the Solar PV Arrays and **Green Infrastructure Strategy [AS-005]**. This includes an assessment of the Scheme, including the BESS, on ecology and biodiversity is presented within **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044].**
TPC-022	Cumulative Effects, In-Combination Impacts	The listing of all aspects of the project separately masks the real scale, the permanent nature and severity of the impacts on BMV prime food producing agricultural land, landscape character, residential amenity, public rights of way,	The ES provides a full environmental assessment in accordance with relevant legislation and guidance. **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

ID	Theme	Representation	Applicant's Response
		soil resources and nearby rural communities.	assessing receptor sensitivity, magnitude of impact, the effect significance matrix, and significance of effect definitions. Technical assessments within the **ES Volume 1 [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 has assessed the likely significant effects in the **ES [APP-042** to **APP-056]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans, which will ensure that the impacts are kept to a minimum, are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032]**. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [APP-209]**. The Secretary of State will balance those potential impacts against the urgent need and critical national priority for the Scheme as set out in Government policy.

ID	Theme	Representation	Applicant's Response
TPC-023	Ecology and Biodiversity	It is known that fencing restricts wildlife communities. Deer roam the area with sightings of Red, Roe and Chinese Water deer regularly reported with photographic evidence. There is no mitigation of the fenced areas even for small mammals. East Anglia is the last stronghold of brown hares. Hedgehogs are rapidly declining due to the loss of large areas of rural habitats. The project will change our locality from rural farms and homes within a peaceful and natural setting to an urbanised developed industrial environment.	Deer species do not receive direct legislative protection relevant to ecology or nature conservation, whilst deer species are not listed as Priority species, albeit may receive protection against acts of cruelty (for example, under the Wild Mammals (Protection) Act 1996). It was agreed through the EIA scoping process that the only mammal species which would be assessed and which do not warrant full legal protection would be those listed within Section 41 of the Natural Environment and Rural Communities Act 2006. The Planning Inspectorate agreed that '*subject to the agreement of relevant consultees, the Inspectorate agrees that significant effects are unlikely to occur on these species*' and the matter could be scoped out. The Scheme's operational phase is considered likely to benefit these priority species through habitat improvements created for wider BNG purposes and with the provision of precautionary pollution prevention measures provided within the **Outline OEMP [APP-197]**. 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 ditches, hedgerows and their surrounding buffers, which allow for the movement of

ID	Theme	Representation	Applicant's Response
			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]**. Protection measures for brown hare and hedgehogs are described in **ES Volume 3, Appendix 8.10 - Outline Protected Species Mitigation Strategy [APP-161]**. Management of retained and newly created habitats that will benefit wildlife (including hares) are prescribed within the **Outline LEMP [APP-199]**.
TPC-024	Examination process	Tivetshall Parish Council is seriously concerned about the possibility that the amount of time that will be made available during the Examination period of this NSIP application for the preparation of its full written representation will be insufficient. The number of documents that must be studied and evaluated within this large application is huge.	The Applicant notes Tivetshall Parish Council's concerns regarding the Examination timetable and the resources available to voluntary bodies. The setting of the Examination timetable is a matter for the Examining Authority. Interested Parties can raise comments on the draft Examination timetable **[PD-005]** to the Examining

ID	Theme	Representation	Applicant's Response
TPC-025	Examination process	It is essential that the examination timetable provides parish councils and voluntary organisations with enough time to research and prepare a thorough and full written representation. Unlike the applicant we cannot afford to hire a wide range of experts to prepare our documentation, papers and maps. We rely on the voluntary efforts of councillors and others to prepare our case and it will take these volunteers a considerable amount of time to undertake this enormous task.	Authority at Procedural Deadline A and at the Preliminary Meeting.
TPC-026	Examination process	The Examination timetable will presumably be set out after the closure of the registration period on June 10th. Please ask the Inspectors to schedule a deadline date for the submission of written representations that at least provides us with a 4 to 5 month period (after June 10th) to prepare our submission - especially as this period will include the Summer holiday months of July and August.	

2.19 Topcroft Parish Council

Table 2.19 Applicant's Response to Topcroft Parish Council [RR-1960]

ID	Theme	Representation	Applicant's Response
ToPC-001	General	Topcroft Parish Council objects to the East Pye Solar Scheme (EPS) for many reasons. Topcroft is a unique rural community. The Scheme will cause harm in many different ways that would leave a permanent scar on the countryside around us and therefore the lives of everyone in the area, including our community.	The Applicant notes this comment and provides its comments below.
ToPC-002	Construction and Decommissioning Socio-Economics	These harms would be long lasting and cannot be mitigated. They are not outweighed by any of the 'benefits' demonstrated so far by the scheme. People living in Topcroft would be affected going about their daily lives: the routes to work, the school run, trips to Norwich and local villages as well as any outdoor activities. Many people choose to live in the countryside because of the green open spaces and all the benefits they bring.	The Applicant has assessed the likely significant effects in 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. The management plans are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032]**. The planning balance considering the positive, neutral and negative impacts are set out in the **Planning Statement [APP-209]**. The Secretary of State will balance those potential impacts against the urgent need and critical

ID	Theme	Representation	Applicant's Response
			national priority for the Scheme as set out in Government policy.
ToPC-003	Socio-Economics Water Environment – Water Quality, Drainage and Flood Risk Ecology and Biodiversity	Some of the other ways we will be affected are: Local businesses, especially if they rely on tourism; house and property prices and the ability to sell; the visual impact; glint and glare; enjoying the open spaces in a huge variety of ways; damage to the environment including hedge and tree removal and change to the soil structure; drainage; damage to local infrastructure during the construction; 'Mitigation' for wildlife does not work because animals cannot just move areas. They need the whole ecosystem and there are precious few healthy ones left.	The Applicant has assessed the likely significant effects in the **ES [APP-042 to APP-056]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032].** **ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** incudes an assessment on the economy and local businesses. The Applicant is committed to promoting innovation, employment and skills within the communities. Measures and partnerships are outlined in the **Outline ESSCS [APP-205]**. The detailed ESSCS is secured through Requirement 19 of the **Draft DCO [AS-032]**. This will identify opportunities relating to skills, the supply chain and employment which the Applicant commits to progressing post-consent in accordance with the Outline ESSCS. These initiatives will help support local individuals and businesses in accessing the employment, skills, and supply chain benefits associated with the Scheme. The Applicant is also committed to the provision of new permissive paths and community accessible

ID	Theme	Representation	Applicant's Response
			space, as set out in the **Design Principles, Parameters and Commitments [APP-213]** and the **Outline LEMP [APP-199]**. 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 industrial scale solar farms cause significant long-term adverse effects on property prices. Whilst it is

ID	Theme	Representation	Applicant's Response
			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. 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.
ToPC-004	Statement of Need Site Selections, Alternatives and Design Evolution	The need for energy security is not in dispute. There is also a need for food security. Solar panels could be placed on rooftops. There are thousands of acres of warehouse rooves alone that could be used. We need the land	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

ID	Theme	Representation	Applicant's Response
		available for crops. Rooftops cannot be used for growing crops on a large scale!	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 instead of, rooftop solar. The Applicant supports the development of rooftop solar installations. However, as set out in the **Statement of Need [APP-206],** and consistent with the Government's view, the Applicant considers that 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 During the design evolution of the Scheme, consideration was given to reducing the impact on BMV quality land, as far as practicable, as

ID	Theme	Representation	Applicant's Response
			described in the **Design Approach Document [APP-212]**. Solar farms do not necessarily result in a cessation of agricultural production, because grazing uses can continue in parallel. They do, however, limit opportunities for arable farming uses. **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 relevant planning authority, as secured by Requirement 18 in the **Draft DCO [AS-032]**.
ToPC-005	General	Topcroft Parish Council supports all the points in the entire document being submitted by Block East Pye Solar (BEPS). These things will affect our neighbours, families and friends directly and so affect our lives as well.	The Applicant has provided responses to Block East Pye Solar's Relevant Representation in the **Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [EN0110014/EXAM/8.8]**.

ID	Theme	Representation	Applicant's Response
ToPC-006	Statement of Need	1. No demonstrated need for this Scheme in this location or region This region already meets the Clean Power 2030 regional solar capacity ranges. The damage to the local rural landscape will damage the ecology, hydrology, protected species, local aviation, and heritage assets.	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). 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

ID	Theme	Representation	Applicant's Response
			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. 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

ID	Theme	Representation	Applicant's Response
			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 Applicant has responses to National Grid Electricity Transmission Plc's Relevant Representation [RR-1408], with responses provided to NGET-006 and NGET-007 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]**. 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
ToPC-007	The Applicant	2. Appearance of bias concerning DESNZ and Macquarie There is a big concern about bias over a meeting on 27th January 2025 arising from the Department of energy Security and Net Zero (DESNZ) with Macquarie.	The Applicant notes this comment and refers to its response provided to Block East Pye Solar under comment reference BEPS-010 in the **Applicant's Response to Relevant Representations Part 3: Other Statutory Bodies, Undertakers and Notable Parties [EN0110014/EXAM/8.8]**.
ToPC-008	Ecology and Biodiversity	3. European protected species and Habitats Regulations issues Many species will suffer if the scheme goes ahead. There is so little land of value to wildlife left. Barbastelle Bats are a European Protected Species and cannot legally be disturbed. There are multiple maternity colonies across the region which need the area for foraging and roosting etc. There are also white-clawed crayfish in the Tas chalk stream. It has not been made apparent how the applicant will protect these species so they are not unlawfully harmed.	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 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

ID	Theme	Representation	Applicant's Response
			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-213]** and illustrated in **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. The Applicant notes that the Examining Authority's (ExA) have requested further information and potentially for surveys to be carried out for White Clawed Crayfish between July – September, in the Rule 6 letter [PD-005]. The Applicant will provide an update on this at Procedural Deadline A as set out in the document **Applicant's Position on White Clawed Crayfish [EN0110014/EXAM/8.5]**. The Scheme designs primarily utilise intensively managed farmland habitats, of sub-optimal value for foraging/commuting bat species. These habitats are subject to regular ploughing, tithing, harvesting (often undertaken at nighttime with large

ID	Theme	Representation	Applicant's Response
			machinery and uncontrolled spotlights), herbicide/insecticide applications, and fertiliser spreading activities. These regular actions are undertaken with no specific mitigation in place and undertaken up to the field boundaries with adjacent woodlands (some of which are known to include bat roosts, including Barbastelle bat maternity roosts), therefore, land utilised for the Scheme is currently subject to regular disturbance, with the Scheme considered to represent no significant increase on this during construction and decommissioning and likely resulting in much reduced disturbance to existing roosts during the 60-year operational phase. The embedded design principles adopted and detailed within the **Design Principles, Parameters and Commitments [APP-213]** and illustrated on **ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059],** include the retention and enhancement of field boundary features (hedgerows/ ditches/tree lines/woodlands/rivers) and the commitment to large-scale biodiversity enhancements; with significant habitat gains for the benefit of (amongst other species groups) bats, including Barbastelle bats. It is therefore considered that under the Conservation of Habitats and Species Regulations 2017, there is no justification for an EPSML for

ID	Theme	Representation	Applicant's Response
			Barbastelle Bats, and that the Scheme will not result in significantly increased disturbance which would result in: (a) to impair their ability— • to survive, to breed or reproduce, or to rear or nurture their young; or • in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) to affect significantly the local distribution or abundance of the species to which they belong. **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and **ES Volume 3, Appendix 8.6 - Bat Activity Survey Report [APP-157]** have acknowledged the presence of Barbastelle bat maternity colonies locally and also referenced material detailing the CSZ's of these colonies, clearly stating that the Order Limits occupy land within these CSZ's. Additional precautionary measure, are embedded within the design principles adopted and detailed within the **Design Principles, Parameters and Commitments [APP-213]** and illustrated on **ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]** include for a minimum of 30m buffer of all ancient woodlands immediately adjacent to the

ID	Theme	Representation	Applicant's Response
			Order Limits and will include habitat creation within these buffer zones. Thereby, reducing the current baseline disturbance events associated with agricultural practices (currently right up to the woodland edges), and providing enhanced supporting habitats surrounding woodland parcels for the benefit of Barbastelle bats (if present), thereby contributing towards the species favourable conservation status.
ToPC-009	Water Framework Directive	4. Water Framework Directive, chalk streams and private water supplies The groundworks themselves will affect the water quality and flow rate to the River Tas, Hempnall Beck as well as the Waveney which also is linked to the drainage network. This will also affect the ecology and the White Clawed Crayfish in the Tas. EPS has not adequately demonstrated how this could be avoided. There are private houses relying solely on well water in several areas. The disturbance of the soil will negatively affect the quality of the water. It is not clear how this can be avoided.	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 the **Outline DEMP [APP-198]**. Following the implementation of embedded mitigation, **ES Volume 1, Chapter 9 – Water Environment [APP-045]** concludes that no significant adverse residual effects on the water environment are anticipated during the construction, operation and maintenance, and decommissioning phases, with a significant beneficial effect identified on hydrological receptors

ID	Theme	Representation	Applicant's Response
			during operation arising from the reduction in agricultural chemical and fertiliser application and associated nutrient loading. 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]**.
ToPC-010	Water Environment – Water Quality, Drainage and Flood Risk	5. Contamination, former airfields and groundwater risk There is concern that the EPS has not fully assessed how the construction activities will affect contaminants in the groundwater which would affect private water supplies as well as ditches, chalk streams and aquifers.	The Conceptual Site Model presented in the **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]** "A*s 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
			for ground investigation to be undertaken post-consent". The **Outline CEMP [APP-196]** includes commitments to undertake Foundation Works Risk Assessment (FWRA) 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). A further commitment (secured by DCO Requirement 13) for trenchless crossings is provided which commits the Applicant to undertaking Hydrogeological Risk Assessment wherever trenchless crossings interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors.
ToPC-011	Soils and Agriculture	6. Best and most versatile agricultural land and soil harm The long-term consequences of covering a huge area in solar panels simply not known. There are predictable effects but these have not been adequately addressed. The foreign companies involved will have little interest, they will just be looking at profit margins. Macquarie have been	These matters are considered in **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]** is submitted and a detailed SRMP will be submitted and can be controlled by DCO Requirement.

ID	Theme	Representation	Applicant's Response
		responsible for Thames Water and Southern Water (amongst other things). Their poor functioning and reputation speak volumes.	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 [APP-198]** 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 overlying land and habitats and to neighbouring communities. A detailed DEMP will be prepared substantially in accordance with the **Outline DEMP [APP-198]**

ID	Theme	Representation	Applicant's Response
			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]**.
ToPC-012	Cultural Heritage Landscape and Visual	7. Cultural Heritage, landscape and residential amenity This is a sensitive and historic landscape we are privileged to be a part of. It is the main reason most people moved here, or did not move away. We are continually reminded on the media that to improve our well-being we should spend time in green open spaces. We do not want them taken away! EPS would industrialise vast areas around our locality.	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. 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**

ID	Theme	Representation	Applicant's Response
			Assessment [APP-148]. The methodology follows GLVIA3, a recognised industry standard. 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.
ToPC-013	Aviation Cumulative impact	8. Aviation and cumulative infrastructure impacts There are concerns how huge areas covered in solar panels would affect local aviation. This does not seem to have been fully considered by EPS. The cumulative affect of large infrastructure projects on the whole area can only be negative.	The Applicant has specifically assessed Tibenham Airfield within **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [APP-189]** to **[APP-193]**, and the **High Level Investigative Report [APP-222]** considering glint and glare and emergency landing. The assessments concluded that a significant effect, and therefore distraction and operational constraints, is not predicted.
ToPC-014	Consultation and Engagement	9. Consultation and procedural unfairness The consultation and procedural processes have been unfair and discriminatory. There is so much information it is impossible to get through. Much of the information is not	<u>Adequacy of Consultation</u> 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

ID	Theme	Representation	Applicant's Response
		clear the relevant research is inadequate or absent. There are areas where the intention has changed without adequate warning (some areas removed, others added etc) People have been sent letters saying their property could be 'compulsorily purchased' without much explanation and others have not been informed directly at all even though their property is earmarked for use by EPS. EPS should be demonstrating how each matter can be resolved before applying for consent to carry this application.	(Applications: Prescribed Forms and Procedure) Regulations 2009. 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 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

ID	Theme	Representation	Applicant's Response
			application documents and register as an interested party. Compulsory Acquisition The Applicant's preference is to secure necessary land rights under voluntary agreement. However, it is standard practice for developers of NSIPs to seek compulsory acquisition powers to ensure delivery of the Scheme. The **Statement of Reasons [APP-020]** sets out that the compulsory acquisition powers sought in the **Draft DCO [AS-032]** are necessary to provide sufficient land and rights to construct, operate and decommission the Scheme, and all reasonable alternatives to compulsory acquisition have been explored and where possible secured, for example through landowner agreement as evidenced in the **Book of Reference [APP-022]**. As part of the DCO process, the Applicant is legally required to identify anyone who may have land that could be affected by the Scheme. The LIQ is part of this legal process. The Applicant acknowledges that this can appear formal, but its purpose is to help the Applicant ensure that the land interest information it holds is accurate and up to date.

ID	Theme	Representation	Applicant's Response
			The Applicant confirms that there is no intention to compulsorily purchase any homes or gardens for the Scheme. The Applicant's communication channels including an email address, Freephone number and Freepost address as well as the Land Referencing Team's communication channels, including a dedicated email address and telephone number remain available for any landowner or resident that has questions or concerns regarding this part of the process.
ToPC-015	Statement of Need Planning, Policy Compliance	10. Overall planning balance and remedies sought EPS has not demonstrated that there is a compelling need for this scheme to go ahead. There are many issues that have not been adequately researched or assessed to demonstrate that they are not flawed.	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. The Schene is therefore evidenced as going towards meeting the need established in NPS EN-1. 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.
ToPC-016	Consultation and Engagement	To add to the BEPS document, we believe the application is discriminatory on several counts: In order to register an objection a person needs a huge amount of knowledge so that the objection is relevant. There are over 250 documents, many with 100 pages or more and some with around 900 pages in them. Some of the Appendices alone	<u>Accessing Application Documents</u> The Applicant continues to ensure that all Application documents are made available to those with limited access to computers. 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

ID	Theme	Representation	Applicant's Response
		are over 100 pages long. It is estimated that there between 10,000 and 15,000 pages to read, understand and research; an impossible task. This discriminates against everyone. People who are not online, have to go through quite a process to get a paper copy of the relevant document. Each individual has to apply separately and get their own application number. Each applicant is limited to 500 words. How can a meaningful objection be made in 500 words? It suggests that you have to write in to get the paper copy. This takes time. If you make the phone call it could be expensive to ring the number given. The phone message to request a paper copy, states that if it is not answered within 20 minutes it will be cut off. This makes the whole event stressful. A printed version of the application is available for a cost of up to £5000!	Library, Poringland Library and Bungay Community Library. Further details on this have been published on the Applicant's website. The 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 sticks were available to be sent directly to individuals upon request. The Applicant's **Section 56 Notice [OD-003]** provided further information on obtaining DCO application documents. <u>Submitting a Relevant Representation</u> As the Relevant Representation process is managed by the Planning Inspectorate, the Applicant has no control over the format of submissions. Paper forms were available on request from the Planning Inspectorate, and longer submissions could be sent to the Planning Inspectorate's email or postal address.
ToPC-017	Construction	Installation	The Applicant notes the Parish Council's concerns regarding construction disruption. The likely

ID	Theme	Representation	Applicant's Response
		During the installation time there will be a huge amount of inconvenience with traffic being re-routed, noise and pollution.	significant effects during construction, including in relation to traffic, noise, air quality and community amenity, are assessed within the **ES [APP-036 to APP-195]**, including **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**, **Chapter 12 – Noise and Vibration [APP-048]** and **Chapter 13 – Air Quality [APP-049]**. Following the implementation of embedded mitigation, **ES Volume 1, Chapter 11 – Transport and Access [APP-047], ES Volume 1, Chapter 12 – Noise and Vibration [APP-048]** and **ES Volume 1, Chapter 13 – Air Quality [APP-049]** conclude that no significant residual effects on transport and access, noise and vibration or air quality are predicted during the construction phase of the Scheme. Mitigation is secured through **the Outline CEMP [APP-196]** and **Outline CTMP [APP-201]**, delivered via Requirements 13 and 15 of the **Draft DCO [AS-032]**.
ToPC-018	Ecology and Biodiversity	Environmental Impacts All species including the protected species will be negatively affected by vast areas of solar panels. They will be fenced in with security cameras and lights, they will also affect the natural food sources of the local wildlife. The	The Applicant has assessed the likely significant effects in the **ES [APP-042 to APP-056]** and outlined the measures taken to avoid, mitigate and minimise these impacts as far as possible. The management plans are secured via the Requirements contained within Schedule 2 to the **Draft DCO [AS-032]**. The planning balance considering the positive, neutral and negative impacts are set out

ID	Theme	Representation	Applicant's Response
		soil structure will be changed and the shade under the panels will change the nature of what is available. They will also prevent the natural movement of animals, due to the fencing.	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.
ToPC-019	Noise and Vibration	The noise from the inverters and substations can be heard over a large distance, affecting homes and public areas as well as footpaths and rights of way. (PROW)	The assessment of operational noise and vibration is presented in **ES Volume 1, Chapter 12 - Noise and Vibration [APP-048]**. Operational noise effects on Public Rights of Way are predicted to be negligible, reflecting low sound levels along routes primarily used during daytime hours, and are not significant. During construction, noise and vibration from construction activity near PRoW is expected to be localised, short-term and within normal working hours and is not considered significant. Mitigation is secured through the **Outline CEMP [APP-196]**, which requires works to be undertaken in accordance with best practicable means as set out in BS 5228 (including silenced plant, acoustic enclosures, low-speed operation, and temporary screening for static noisy plant), and through the **Outline PRoWPPMP [APP-203**], which provides for signage, banksmen, speed limits of 5–10mph near PRoW and safe management of PRoW crossings during construction. Detailed CEMP and PRoWPPMP will be submitted to and approved by the relevant planning authority in accordance with the

ID	Theme	Representation	Applicant's Response
			Requirements in Schedule 2 of the **Draft DCO [APP-017]**. Mitigation measures to control noise and vibration during operation are described **Outline OEMP [APP-197]**; this includes in relation to the solar invertors, National Grid Substation, BESS, Integrated Conversion Units/33kV Sub-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.
ToPC-020	Socio-Economics	Socio- Economic Factors The panels will have an adverse effect on people coming to the area for business, tourism and leisure due to the	**ES Volume 1, Chapter 14 – Socio-Economics [APP-050]** incudes an assessment on local tourism assets. Measures incorporated into the **Outline CEMP [APP-196], Outline OEMP [APP-197]**, **Outline**

ID	Theme	Representation	Applicant's Response
		huge visual impact, fencing, noise and the effect on the environment.	**PRoWPPMP [APP-203], Outline CTMP [APP-201]** and **Outline OTMP [APP-202]** will mitigate impacts on the environment as far as practicable.
ToPC-021	Construction and Decommissioning	Decommissioning This needs to be guaranteed with clear intentions for the land after use so we do not leave future generations with even more environmental problems.	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. 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. 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

ID	Theme	Representation	Applicant's Response
			commencement of decommissioning. This is secured through Requirement 21 in Schedule 2 of the **Draft DCO [AS-032]**. 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. The Applicant confirms that none of the land for solar development is brownfield after decommissioning as the land will be reinstated and soils restored to the previous condition. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land.

2.20 Wacton Parish Council

Table 2.20 Applicant's Response to Wacton Parish Council [RR-2004]

ID	Theme	Representation	Applicant's Response
WPC-001	Examination process	Wacton Parish Council is seriously concerned about the possibility that the amount of time that will be made available during the Examination period of this NSIP application for the preparation of its full written representation will be insufficient. The number of documents that must be studied and evaluated within this large application is huge.	The Applicant notes Wacton Parish Council's concerns regarding the Examination timetable and the resources available to voluntary bodies. The setting of the Examination timetable is a matter for the Examining Authority. Interested Parties can raise comments on the draft Examination timetable **[PD-006]** at Procedural Deadline A and at the Preliminary Meeting.
WPC-002	Examination process	It is essential that the examination timetable provides parish councils and voluntary organisations with enough time to research and prepare a thorough and full written representation. Unlike the applicant we cannot afford to hire a wide range of experts to prepare our documentation, papers and maps. We rely on the voluntary efforts of councillors and others to prepare our case and it will take these volunteers a considerable amount of time to undertake this enormous task.	

ID	Theme	Representation	Applicant's Response
WPC-003	Examination process	The Examination timetable will presumably be set out after the closure of the registration period on June 10th. Please ask the Inspectors to schedule a deadline date for the submission of written representations that at least provides us with a 4 to 5 month period (after June 10th) to prepare our submission - especially as this period will include the Summer holiday months of July and August.	

2.21 Woodton Parish Council

Table 2.21 Applicant's Response to Woodton Parish Council [RR-2023]

ID	Theme	Representation	Applicant's Response
WoPC-001	Site Selection, Alternatives and Design Evolution	Woodton Parish Council wish to strongly object to the East Pye proposal and will be making representation to this effect for the following reasons: Scale of the development is disproportionate to area.	The Applicant notes Woodton Parish Council's objection to the scale of the Scheme. The **Statement of Need [APP-206]** sets out the national and regional need for utility-scale solar generation at this scale. 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 **Site Selection Assessment [APP-215]** sets out the site selection process and the **Design Approach Document [APP-212]** sets out the iterative design process, alongside **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**. 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 has been designed to maximise the energy generation benefit from the available land

ID	Theme	Representation	Applicant's Response
			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.
WoPC-002	Transport and Access	Unsuitability of scattered rural sites for access issues – large vehicles in narrow lanes	The Applicant notes the Parish Council's concerns regarding access and large vehicles in narrow lanes. Construction traffic effects on the local road network are assessed in **ES Volume 1, Chapter 11 – Transport and Access [APP-047]**, supported by **ES Volume 3, Appendix 11.1 – Transport Assessment [APP-174 to APP-177]**. Mitigation, including designated HGV routing to minimise use of unsuitable rural lanes, and the use of a vehicle booking system and vehicle holding areas to proactively manage construction vehicle movements to site and ensure impacts on the rural and local road network is reduced where practicable, is secured through the **Outline CTMP**

ID	Theme	Representation	Applicant's Response
			[APP-201] and Requirement 15 in Schedule 2 of the **Draft DCO [AS-032]**.
WoPC-003	Transport and Access	Impact on highways for Woodton and all surrounding villages.	As per Design Principle 5.4**,** outlined in the **Design Approach Document [APP-212]**, the Applicant has sought to route construction vehicles away from local villages wherever practicable. This includes local villages such as Hempnall, Saxlingham Nethergate, Woodton and Brooke. Further detail confirming construction vehicle routes and measures to manage these vehicle movements are set out in the **ES Volume 2, Appendix 11.1 - Transport Assessment [APP-174** to **APP-177]** and the **Outline CTMP [APP-201]**.
WoPC-004	Soils and Agriculture Landscape and Visual Ecology and Biodiversity	Loss of agricultural land, ecological habitat & attractive rural landscapes	**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 relevant

ID	Theme	Representation	Applicant's Response
			planning authority, as secured by a Requirement 18 in the **Draft DCO [AS-032]**. A detailed landscape and visual assessment is 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 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**

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			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.
WoPC-005	Transport and Access	Impact and disturbance on local residents with main trunk route for construction vehicles passing through our village	**ES Volume 1, Chapter 11 - Traffic and Access [APP-043]** and **ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174** to **APP-177]** presents an assessment of the Scheme on traffic and access, with the proposed construction routes and access points shown in the **Outline CTMP [APP-201]**. 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. Detailed CTMP, OTMP and PRoWPPMP will be submitted to and approved by the relevant planning authority in accordance with

ID	Theme	Representation	Applicant's Response
			Requirements 15, 16 and 17 of the **Draft DCO [AS-032]**. 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. The Applicant also confirms that AILs are not proposed to be routed through the village of Woodton, and would be routed via B1527 which travels to the north of Woodton. This is shown in Figure 11.8 of **ES Volume 2 Figures 11.2 - 11.8 Likely and Suitable Routes to the Scheme [APP-095]**. AIL are not a frequent delivery method and only used for transformers and larger cable drums. The AIL movements will be undertaken using strict traffic management and notification of these types of movements will be communicated in advance. 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. As part of the management of AIL, the selected haulier must notify the police, highway authorities and bridge owners when planning to transport AIL. It is likely that AIL deliveries will require temporary road closures or diversions on the day of the delivery

ID	Theme	Representation	Applicant's Response
			and may require police escorts to maintain the safety of members of the public.
WoPC-006	Scheme	No benefit to South Norfolk as power supply intended for major cities	The Applicant notes the Parish Council's comment regarding the destination of the power supply. The Scheme will provide energy to the national transmission network. The wider benefits of the Scheme, including contribution to decarbonisation, energy security and grid resilience, are set out in the **Statement of Need [APP-206]** and **Planning Statement [APP-209]**. The Applicant is also developing proposals for a Community Benefit Fund, as referenced in the **Planning Statement [APP-209]**.