



Application by East Pye Solar Limited for East Pye Solar project

The Examining Authority's initial written questions and requests for information (ExQ1): Issued on 23 September 2026.

Responses are due by deadline 1: 6 October 2026

The following table sets out the Examining Authority's (ExA's) initial written questions and requests for information - ExQ1. The examination timetable enables the ExA to issue further rounds of written questions in due course. The further rounds of questions will be referred to as ExQ2 and ExQ3.

The following questions represent the ExA's initial set of questions on mostly general and strategic matters arising from our reading of the application documents, relevant representations and matters arising from submissions made at open floor hearings 1 and 2, and issue specific hearing 1. A further, more detailed, set of ExA questions, including on all matters arising in relation to the principal issues will follow later in the examination on 10 November 2026. This will follow the receipt of written representations (deadline 1) and comments on these (deadline 2).

Questions are set out using an issues-based framework generally derived from the initial assessment of principal issues provided as **annex C** to the [Rule 6](#) Letter dated 15 July 2026.

Column 2 of the table indicates which interested parties and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with 1 (indicating that it is from ExQ1) and then has an issue number and a question number. For example, the first question on general and cross topic issues is identified as Q1.1.1. When you are answering a question, please start your answer by quoting the unique reference number.

Use of artificial intelligence (AI) in casework evidence

If you use AI to create your submission, you should tell us that you have done this. You should specify which systems or tools you have used, the source of the information that the AI system has based its content on, and what information the AI has been used to create or alter. Further



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information can be found in the Planning Inspectorate's [guidance](#). By following this guidance, you will help the ExA to understand the origin and accuracy of the information submitted, thereby supporting fair and impartial decision-making. **If you do not declare the use of AI in any evidence submission where it has been used or remove evidence such as watermarks, we reserve the right to reject the submission.**

You should respond to the questions by using the **Have your say** function on the [project page of the National Infrastructure website](#) and selecting 'Responses to Examining Authority's first written questions (ExQ1)' when asked.

If you are responding to a small number of questions, you can submit your answers by choosing 'Make a comment' and entering your answers in the 'Your comments' box. If you are answering a larger number of questions you should download a copy of the Microsoft Word version of the document, enter your answers and save the document using an appropriate file name. You can then submit the completed document by selecting 'Upload files'.

Microsoft Word version: [Examining Authority's Written Questions 1 \(ExQ1\) \(Word Version\)](#)



Abbreviations used:

BESS	battery energy storage system	NCC	Norfolk County Council
BNG	biodiversity net gain	NGET	National Grid Electricity Transmission
CLG	community liaison group	NPPF	National Planning Policy Framework
dDCO	draft Development Consent Order	NPS	National Policy Statement
EIA	environmental impact assessment	oCEMP	outline Construction Environmental Management Plan
ES	Environmental Statement	oOEMP	outline Operational Environmental Management Plan
ExA	Examining Authority	oCTMP	outline Construction Traffic Management Plan
ExQ	Examining Authority's written questions	PRoW	public rights of way
EN-1	Overarching National Policy Statement for Energy, 2025	PV	photovoltaic
EN-5	NPS for Electricity Networks Infrastructure, 2025	R	requirement
FP	Footpath	RVAA	Residential Visual Amenity Assessment
kgCO₂e	kilograms of carbon dioxide equivalent	RR	relevant representation
kV	kilovolt	SF6	sulphur hexafluoride
LNRS	Local Nature Recovery Strategy	SNDC	South Norfolk District Council
m	metres	tCO₂e	tonnes of carbon dioxide equivalent



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The Examination Library

References in these questions set out in square brackets (for example [[APP-010](#)]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link: [EL web link](#). It will be updated as the examination progresses.

Citation of questions

Questions in this table should be cited as follows:

Question reference: issue reference: question number, for example ExQ1 1.1.1 – refers to question 1 in this table.



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ExQ1	Question to:	Question:
1. General and cross-topic questions		
Q1.1.1	The applicant	Mitigation hierarchy The Overarching National Policy Statement for Energy (EN-1) states that applicants must apply the mitigation hierarchy and demonstrate that it has been applied (4.2.23). It goes on to say that applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated (paragraph 4.2.24) and how residual impacts will be compensated as far as possible. This is one of the requirements to be satisfied for the Critical National Priority presumption to apply (paragraph 4.2.27). For each relevant topic area, the applicant is requested to provide a summary demonstrating how the mitigation hierarchy has been applied, including cross-references to relevant documents. This should also show how each relevant mitigation measure is secured through the draft Development Consent Order (dDCO) [AS-032].
Q1.1.2	The applicant, South Norfolk District Council (SNDC), Block East Pye Solar, any Parish Council	Community Liaison Group Section 5.7 of the Planning Statement [APP-209] provides a general description of proposals for a community liaison group (CLG) with some limited further detail in the outline Construction Environmental Management Plan (oCEMP) [APP-196]. Requirement (R) 4 of the dDCO [AS-032] provides for the establishment of the CLG, including approval of the terms of reference. Notwithstanding the above, further details/ suggestions are now requested of the roles, responsibilities, participants and draft terms of reference of the proposed CLG in order to maximise its effectiveness during the construction process. This should also address how the CLG would effectively operate across the entirety of the area potentially affected by the proposed development.
Q1.1.3	The applicant	Clarity and accessibility of works plans Several representations have been made by interested parties regarding the clarity and accessibility of the Works Plan (Part 1 and 2) [AS-002] and [AS-003]. As discussed at the preliminary meeting, the applicant is requested to consider further ways of improving the clarity and accessibility of the Work Plans for interested parties. This should include consideration of ways of ensuring that the details of the proposed development, comprising the location of individual works and overlapping works, are presented in a clear, user-friendly manner. In particular, the applicant is requested to consider how the plans can be made easier to view and navigate for parties with limited internet speeds and/ or information technology capability.
Q1.1.4	The applicant	Information request Block East Pye Solar's submission at procedural deadline A [PDA-079] in section 5 includes suggestions for four schedules of information it considers could helpfully be provided by the applicant. The applicant is asked to respond to each of these requests, providing any updated information and clarification on the matters raised, including where existing documents can be updated where this is appropriate and where any new documentation can be provided.
Q1.1.5	The applicant	Document numbering The paragraph numbering in section 4.3 of the Environmental Statement (ES) Chapter 4 (The Scheme) [APP-040] appears to restart from 4.3.1 on page 24. Please review and update where necessary to assist with any future references to the document.
2. Design, parameters and other details of the proposed development		
Q1.2.1	The applicant	Project lifetime Paragraph 2.10.57 of the National Planning Statement (NPS) for Renewable Energy Infrastructure (EN-3) - December 2025 says that an upper project lifetime limit of 40 years is typical, although applicants may seek consent without a time period or for differing time periods of operation. The applicant is asked to explain its reasoning behind its choice of a 60 year project lifetime in this case?
Q1.2.2	The applicant	Energy storage facility An energy storage facility comprising the battery energy storage system (BESS) is proposed through Work No.2. a) To what extent is the purpose of the energy storage facility to store energy from the proposed solar farm in comparison to a more general function in providing peak generation and grid balancing services to the National Grid? What is its expected storage capacity based upon the maximum design parameters?

ExQ1	Question to:	Question:
		b) The applicant is requested to provide a reasoned justification to demonstrate that the entirety of the proposed energy storage facility in this case can be treated as associated development. This should take account of paragraphs 4.7 to 4.11 of The Planning Act 2008: Guidance on preparing an application: Part 3 – Contents of a draft Development Consent Order (July 2026). c) Based on the maximum design parameters, what is the expected number of storage units that could be accommodated within Work No.2? d) How does the Gate 1 prioritisation status with National Energy System Operator affect the delivery of the energy storage facility, including the potential timing of its implementation in relation to that of the remainder of the proposed development?
Q1.2.3	The applicant	Electrical cabling etc (including Works No.1 and Work No.6) Extensive electrical cabling is proposed throughout the Order limits, partly because of the spatial spread of the proposed development. These works appear to be included within Works No.1, Works No.6 and Works No.7(7j). Please clarify any difference and whether there is any duplication.
Q1.2.4	The applicant	Joint bays and link boxes (Work No.6) The proposed joint bays would be up to 20 metres (m) long, 7m wide and 3m deep as set out in the Design Principles, Parameters and Commitments [APP-213]. They are also proposed to be a minimum of 250m to a maximum of 500m apart. a) What is the maximum number of joint bays expected to be required for the proposed development? b) Taking account of their extent and maximum number required, how have they been assessed within the relevant topic areas of the ES? c) A description and reasoning for the link boxes is not included in ES Chapter 4 - the Scheme [APP-040]. For the avoidance of doubt, the applicant is requested to update this and provide an illustrative section drawing of a typical link box. d) What are the maximum dimensions of the proposed link boxes and what is the maximum number that are expected to be required?
Q1.2.5	The applicant	Water storage facility Table 4.2 of the Design Principles, Parameters and Commitments [APP-213] sets out the parameters and commitments for Works No.2. In relation to the water storage facility, the table does not specify how much water would be required to be stored on site. Should a figure be included? If not, why not?
Q1.2.6	The applicant	Lighting Paragraph 4.3.30 (page 31) of ES Chapter 4 (The Scheme) [APP-040] states that lighting is not required within the solar photovoltaic (PV) arrays for the operational phase. Lighting of the project substations, National Grid substation and BESS would be in accordance with health and safety requirements, particularly around emergency exits where there would be lighting similar to street lighting that operates from dusk. Paragraph 4.3.31 states that motion sensing lighting will be implemented in the substations and BESS and other critical infrastructure to be used only for maintenance and security purposes. a) Would all the lighting be operated by motion sensing or only lighting needed for maintenance and security purposes? b) Can you clarify whether there would be any permanent lighting? If so, where would it be located? c) It is acknowledged that there is reference to lighting in the management plans (including the oCEMP [APP-196] and the outline Operational Environmental Management Plan (oOEMP) [APP-197]) although this appears high level. Given there is no specific requirement within the dDCO for lighting and the lighting strategy is not a certified document, however the lighting strategy states at paragraph 1.1.7 that detailed lighting design would be developed at the detailed design stage, can you clarify how details of lighting would be secured and whether this should be in a single document? d) Does further detail on lighting need to be added to the Design Principles, Parameters and Commitments [APP-213] to reflect the type of lighting proposed?

ExQ1	Question to:	Question:
Q1.2.7	The applicant	Solar panel replacement and maintenance Paragraph 4.5.32 of ES Chapter 4 - The Scheme [APP-040] assumes that the operational life of solar panels is 40 years and that all panels would be replaced once and that the BESS could be replaced up to five times during the operational phase. Can you confirm the following: a) Whether replacement solar panels and BESS units, including those replaced at year 40 and as part of routine maintenance, would be the same specification as those initially installed? b) If replacements differ from those initially installed, what implications this could have, for example might the PV solar arrays/ BESS area be different? c) How would any changes to the specification or technology of the solar panels or BESS during the operational period be managed and secured within the dDCO?
Q1.2.8	The applicant	Construction compounds and laydown areas Clarify the following and provide further information in relation to construction compounds and laydown areas. At present, the construction compounds referred to in documents such as the outline Construction Traffic Management Plan (oCTMP) [APP-201] and oCEMP [APP-196] do not appear to be explicitly referred to in the dDCO [AS-032] and there is mainly reference to laydown areas: a) What is the distinction between construction compounds, construction laydown areas and secondary laydown areas, including the different functions and proposed use of each type of area? b) Can further information on the secondary laydown areas be provided, such as within the oCTMP [APP-201] or the Design Principles, Parameters and Commitments [APP-213]? c) Is the intention that temporary construction compounds would be authorised under Works No.8 of the dDCO, which refers to temporary laydown areas but does not expressly refer to temporary construction compounds, whereas the Design Principles, Parameters and Commitments [APP-213] at table 4.8 refers to temporary construction and decommissioning compounds? d) Why are temporary laydown areas included within Work No.8 and also other individual works (Works No.4, No.5 and No.6) of the dDCO? Is there duplication?
Q1.2.9	The applicant	Construction compound – site 5 Following a question raised by Morningthorpe and Fritton Parish Council at Issue Specific Hearing 1, could the applicant provide further information on the purpose and function of the construction compound at site 5? In particular, please explain how materials delivered to this compound will be managed, including whether they will be distributed to other construction locations across the scheme or used solely to support construction activities at site 5.
Q1.2.10	The applicant	Design and the experience of public rights of way (PRoW) users Paragraph 6.3.22 of the Design Approach Document [APP-212] says that the oCEMP and Outline Public Right of Way Management Plan require the applicant at detailed design stage, to give further consideration to the experience of people using the PRoW, including (but not limited to) the layout of PV arrays within individual fields, the siting of conversion units/ switch rooms and substations. a) The applicant is asked to explain, why this consideration has not already been carried out as part of the initial preparation, assessment and design of the application, rather than leaving it to the detailed design stage? b) Explain what measures, including in relation to the layout of the different elements of the development, might be implemented in the detailed design submissions following consideration being given to the experience of people using PRoW?
Q1.2.11	The applicant	PV arrays adjacent to PRoW Based on the design parameters, the applicant is requested to provide an illustrative cross-section showing PV arrays, and other works such as fencing, closed circuit television cameras and landscaping adjacent to PRoWs. This should include relevant separation distances notated on the cross-section drawing(s).

ExQ1	Question to:	Question:
Q1.2.12	The applicant	Buffers Table 3.2 of the Design Approach Document [APP-212] lists the minimum offsets/ buffers from existing features. Can you clarify where these distances would be measured from, for example fenceline, midpoint, and update the relevant documents as necessary.
Q1.2.13	The applicant	Scheme vision Paragraph 3.6.4 of the Design Approach Document [APP-212] sets out the scheme vision to ‘contribute to delivering the UK’s transition to delivering the UK’s transition to decarbonised and low-cost renewable energy provision whilst leaving a positive legacy of benefits for the people’. Can the applicant explain how this ‘positive legacy of benefits for the people’ would be achieved in this case?
Q1.2.14	The applicant, Norfolk County Council (NCC) and SNDC	Design Approach Document [APP-212] and Design Principles, Parameters and Commitments [APP-213] The applicant and local authorities are requested to engage with the aim of ensuring that the design principles, parameters and commitments are appropriately worded so that there can be appropriate certainty regarding the future submission of detailed design proposals and the achievement of good design. An update on this engagement is requested at deadline 1.
Q1.2.15	National Grid Electricity Transmission Limited (NGET)	Proposed National Grid substation (Work No.4) - NGET’s relevant representation (RR) [RR-1408] states that it is NGET’s understanding that the new connection agreement will not include the requirement for the applicant to secure land or consent for the National Grid substation. Can NGET provide further clarification on this ‘new connection agreement’, and why it will not include the requirement for the applicant to secure land or consent for the National Grid substation? - NGET’s RR says that there is the potential that significant NGET infrastructure will need to be delivered to facilitate the project’s connection to the National Electricity Transmission System and that there needs to be careful co-ordination and consultation undertaken to ensure that the scope of the infrastructure to be delivered becomes clear and is unhindered through planning and delivery. What, if any, significant NGET infrastructure would be required in this instance beyond that proposed in the application for development consent? - What is NGET’s current position on the proposed siting and details of the proposed National Grid substation (Work No.4 in the dDCO)? - Is there potentially a situation where NGET may decide that its substation would need to be located in a different location to that proposed in this application? If so, where might it be proposed? - To what extent are NGET’s plans for new grid infrastructure in this location, including a new National Grid substation, related to any other proposed energy schemes (such as the potential Tasway Energy Park, notwithstanding its current status)? - What is NGET’s timescale for the delivery of the National Grid substation and are there any known impediments that could potentially delay its delivery? - Can NGET provide an update on its engagement with the applicant on the proposed new substation and grid connection? - What is NGET’s position regarding the application proposals for works in connection with a connection to the existing overhead transmission electric line (Work No.5 of the dDCO)? - What is NGET’s current position on the drafting of the protective provisions proposed in part 4 of schedule 4 the dDCO [AS-032]. - Are there other further points that NGET wishes to make regarding the East Pye Solar application and proposed grid connection?
3. Site selection and alternatives		
Q1.3.1	The applicant	Site selection following the change in grid connection strategy The applicant is requested to explain, with reference to the evidence base underpinning their submitted site selection documents [APP-041] [APP-215] and subsequent design evolution, why the proposed development remains a reasonably practicable and robust solution following the transition from the originally proposed point of connection to Great Moulton. The response should identify the principal evidence that demonstrates that a fresh site selection exercise centred on Great Moulton would not have resulted in a materially different scheme, site extent, or project configuration.

ExQ1	Question to:	Question:
Q1.3.2	The applicant	Relative influence of environmental and deliverability considerations The applicant is requested to explain the relative influence of environmental assessment, engineering requirements, grid connection considerations, landowner willingness, and land availability in the identification and selection of the Order limits. In particular, the applicant should clarify whether the preferred site was selected principally because it represented the environmentally preferable option or because it offered operational, engineering and grid connection advantages, and whether environmental suitability or land availability was ultimately the determining factor in defining the proposed development.
4. Aviation		
Q1.4.1	The applicant	Aviation safeguarding and aviation safety The ExA notes the submission of the Applicant's Position Statement on Aviation at Procedural Deadline A [PDA-006], which provides additional information regarding aviation safeguarding and aviation safety matters. The ExA welcomes the further explanation provided. However, aviation safeguarding remains a key matter arising from RRs and discussions at issue specific hearing 1, and the ExA considers that further clarification and consolidation of the applicant's case would assist the examination and ensure that the effects of the proposed development on aviation interests are fully understood. The applicant is therefore requested to provide a comprehensive response which demonstrates the progress made since submission of the application and clearly explains the current position regarding aviation safeguarding. In particular, the applicant should: - Identify all elements of the proposed development that may affect aviation interests, including solar arrays, BESS infrastructure, substations, buildings and any other relevant structures. - Provide a consolidated explanation of the assessment undertaken in relation to emergency landing scenarios, engine-failure-after-take-off scenarios, glider launch failure scenarios, and turbulence and wind-shear effects. - Respond in detail to the matters raised by the General Aviation Awareness Council in its RR [RR-0664] and during issue specific hearing 1, including concerns regarding the safeguarding of Tibbenham and Seething airfields, emergency landing areas, the location of solar arrays, BESS infrastructure and substations, and aviation safety risks associated with engine-failure scenarios. - Confirm whether the applicant intends to prepare and submit a consolidated standalone aviation safeguarding and aviation safety document during the examination and, if not, explain why this would not assist the ExA and the Secretary of State for Energy Security and Net Zero. The response should clearly identify any outstanding disagreements and explain how the applicant intends to address them during the examination.
5. Climate change		
Q1.5.1	The applicant	Greenhouse gas assessment and climate resilience Paragraph 6.5.16 of ES Chapter 6 (Climate Change) [APP-042] assumes a projected operation and maintenance phase of the scheme for 60 years and the climate change resilience assessment also considers an expected lifespan of 60 years (paragraph 6.5.49) for the purpose of the environmental impact assessment (EIA). However, some elements of the proposed development would be permanent, such as the National Grid substation. Therefore, has the ES assessed the reasonable worst-case scenario in terms of impacts from emissions, as well as climate change resilience for the lifetime of the proposed development? Could you explain whether extending the assessment period would materially alter the conclusions of the greenhouse gas assessment or climate change resilience assessment and justify why 60 years is considered an appropriate assessment period?
Q1.5.2	The applicant	Carbon emissions related to pylons Table 6.23 and the related commentary in paragraph 6.9.57 of ES Chapter 6 (Climate Change) [APP-042] reports total emissions associated with pylon removal as 107.6 kilograms of carbon dioxide equivalent (kgCO₂e). Please review this figure, confirm the following and make amendments where necessary: - Whether the figure in table 6.23 and paragraph 6.9.57 should be tonnes of carbon dioxide equivalent (tCO₂e) rather than kgCO₂e? - As a result of a), whether the total value reported in table 6.25 and paragraph 6.9.59 is correct?

ExQ1	Question to:	Question:
		c) Whether the reported figures include carbon emissions associated with the temporary pylon and, if not, why not?
Q1.5.3	The applicant	Sulphur hexafluoride (SF6) Paragraph 6.9.70 of ES Chapter 6 (Climate Change) [APP-042] states that SF6 would be used in electrical equipment associated with the substations. Recent decisions for the Peartree Hill Solar Farm Order (2026) and The One Earth Solar Farm Order (2026) secured the commitment from the applicant to avoid the use of SF6, and the decision for the Morgan and Morecambe Offshore Wind Farms Transmission Assets (2026) commits to further assessment or justification in relation to the use of SF6-free switchgear. This approach is supported in policy within the NPS for Electricity Networks Infrastructure, 2025 (EN-5) in paragraphs 2.9.60 to 2.9.65, 2.10.14, 2.10.15 and 2.11.17. With reference to these decisions and the policy references, explain whether the applicant can commit to not using SF6 and if this is not achievable, why not? Where the approach would be altered, would this impact on the design and parameters of the electrical equipment associated with the substations? If so, explain how?
Q1.5.4	The applicant	Greenhouse gas reduction strategy The oCEMP [APP-196], the oOEMP [APP-197] and the outline Decommissioning Environmental Management Plan [APP-198] include measures which form the Green House Gas Reduction Strategy as required EN-1. However, there are several phrases or words used which are considered extremely vague such as 'encouraging', 'where practicable', and 'explore'. Please review these measures and commitments and how they can be updated to ensure definite measures are included to reduce carbon emissions and meet the policies set out in section 5.3 of EN-1.
6. Community, health and well being		
Q1.6.1	The applicant	Human-health: potential exclusion of health pathways The Human Health Summary states at ES paragraph 18.6.22 [APP-054] that it does not anticipate introducing new effects beyond those identified in the technical chapters. Explain how this approach accords with current Institute of Sustainability and Environmental Professionals guidance on the assessment of population and human health and whether any health pathways have been excluded from consideration as a consequence.
Q1.6.2	The applicant	Human-health: reliance on future mitigation, operational controls and detailed design Identify any conclusions on human health that rely on future management plans, detailed design, operational controls or later-stage mitigation and explain how the applicant has nevertheless concluded that likely significant effects on population and human health can be excluded.
Q1.6.3	The applicant	Electromagnetic Fields: scheme-specific assessment The applicant is requested to explain the extent to which the conclusions of ES Chapter 17 [APP-053] rely upon scheme-specific assessment, modelling or design information, as opposed to generic industry data, standard assumptions or published reference values, and identify the principal evidence supporting the conclusion of no likely significant effects. Identify all scheme-specific information used within ES Appendix 17.1 (High Level Electromagnetic Field Assessment) [APP-188] including cable design assumptions, current loads, infrastructure arrangements and receptor locations. Identify any field measurements, modelling or calculations undertaken specifically for the proposed development.
Q1.6.4	The applicant	Fire risk and emergency response: reliance on future assessments, approvals and consultation The application documents and the applicant's responses to RRs, conclusions regarding major accidents and disasters, BESS safety, fire risk, pollution prevention, and emergency response appear to rely on a range of future assessments, approvals, consultation processes and management plans. Provide a schedule identifying: - each future assessment, modelling exercise, test, survey, consultation activity, approval or management plan relied upon in reaching the applicant's current conclusions - the purpose of each item - whether it is required to confirm the acceptability of the proposed development - the mechanism by which it would be secured - the consequences if the outcome differs materially from current assumptions

ExQ1	Question to:	Question:
		f) why the applicant considers the ExA can reach an informed conclusion on likely significant effects before those activities have been completed
7. Compulsory acquisition and temporary possession etc		
Q1.7.1	The applicant	Compulsory acquisition, temporary possession and other land or rights considerations: rights sought The applicant's procedural deadline A responses [PDA-010] state that the rights sought are supported through the Land and Rights Negotiation Tracker [APP-023]. Provide a summary of: a) the total number of affected interests b) the number of voluntary agreements completed c) the number of agreements subject to agreed heads of terms d) the number of interests where negotiations remain ongoing e) the number of interests where agreement has not been reached Explain how the applicant concludes that compulsory acquisition powers remain necessary having regard to the current status of negotiations.
8. Cultural heritage		
Q1.8.1	The applicant	Revised National Planning Policy Framework August 2026 (NPPF) A new NPPF was published on 17 August 2026. This includes changes to the government's approach on the assessment of effects on designated and non-designated heritage assets. The applicant is requested to set out any implications this may have on its assessments on designated and non-designated heritage assets.
Q1.8.2	The applicant	Schedule of effects on designated and non-designated heritage assets Numerous representations have been received from interested parties setting out concerns regarding the effects on specific designated and non-designated heritage assets. a) The applicant is requested to prepare and submit a heritage schedule, including a full list of the heritage assets raised in RRs and those already assessed in the application, representation reference and brief summary, the name and location of the asset, a cross reference to where it has been assessed by the applicant and a brief summary of the applicant's position. This should be updated, as necessary, following the receipt of written representations and subsequently throughout the examination. Where an assessment has not been carried out by the applicant but is now considered to be required following any particular interested party representation, this should also be provided as a separate document to supplement the information already provided with the application.
Q1.8.3	The applicant	Saxlingham Nethergate war memorial, green and walls For the avoidance of doubt and further to RRs and oral representations at open floor hearings 1 and 2, the applicant is requested to submit a drawing clearly showing the extent of all proposed works (including any potential highway works) in the area of the war memorial, adjoining land and historic walls in Saxlingham Nethergate. The drawing should show and clearly mark all relevant features.
9. The draft Development Consent Order		
Q1.9.1	The applicant	Contents page The applicant is requested to ensure that future submitted versions of the dDCO includes page numbering and that the contents page includes the page number for each item. This is to help with ease of navigation of the dDCO document.
Q1.9.2	The applicant	Recently made DCOs for solar projects Several DCOs have been recently made by the Secretary of State for Energy Security and Net Zero for solar schemes and further decisions are expected. In order to provide consistency between Orders (whilst recognising that there may need to be some variation in drafting depending on the particular circumstances of each made order) the applicant is requested to review recently made Orders and, where appropriate, amend the dDCO [AS-032] in order to provide for consistency on approach and drafting.

ExQ1	Question to:	Question:
9.1 Articles		
Q1.9.1	The applicant	Article 2 (Interpretation) In relation to ‘<i>applicable period</i>’: - Explain the reason for the inclusion of <i>the applicable period</i> in this case, noting Requirement 2 (Commencement of the authorised development’). - Given the urgent need for low carbon generation schemes set out in the applicant’s Statement of Need [APP-206], why is it necessary to potentially extend the commencement period for this scheme beyond five years? Has a similar approach been agreed by the Secretary of State for Energy Security and Net Zero in recently made orders?
Q1.9.2	The applicant	Article 2 (Interpretation) In relation to ‘<i>authorised development</i>’: This definition includes ‘the development described in schedule 1 (authorised development) and any other development authorised by this Order...’ It is noted that schedule 1 already contains a wide range of works including a long list of ‘further associated development’. What might ‘any other development’ include beyond what is already contained in schedule 1? Explain why this apparent duplication is necessary or delete the reference to ‘any other development...’
Q1.9.3	The applicant	Article 2 (Interpretation) In relation to “<i>maintain</i>”: - The Planning Act 2008: Guidance on preparing an application: Part 3 – Contents of a Development Consent Order (July 2026) provides guidance on the definition of ‘maintenance’. The definition used in this case appears to be quite wide ranging including ‘reconstruct’, ‘replace’ and ‘improve’. Expanding on the explanation contained in the Explanatory memorandum [AS-034], explain how the guidance has been met in this case. - What controls would be in place regarding the potential replacement of whole works such as the proposed substations (and any buildings and structures) and other elements of the scheme?
Q1.9.4	The applicant	Article 2 (Interpretation) In relation to “<i>permitted preliminary works</i>” and “<i>permitted preliminary works environmental management plan</i>”: - Explain what works would be carried out under (c) of the permitted preliminary works “above ground site preparation for temporary facilities for the use of contractors” and justify its inclusion within the permitted preliminary works. - Explain what works would be carried out in respect of (e) “the diversion and laying of apparatus” and justify its inclusion within the permitted preliminary works. - Explain which existing buildings and structures are likely to require demolition in relation to (h) “site clearance” and justify its inclusion with the permitted preliminary works. - Explain what would be included within ‘vegetation removal’ (h) and how such removal would relate to submissions pursuant to relevant control documents such as the outline Landscape and Ecology Management Plan [APP-199] and the oCEMP [APP-196]. - The ExA notes that a permitted preliminary works environmental management plan is to be submitted at deadline 1. This should include details of how any environmental effects of permitted preliminary works would be managed and mitigated, noting the guidance in paragraphs 4.3 and 4.4 of the Planning Act 2008: Guidance on preparing an application: Part 3 – Contents of a draft Development Consent Order (July 2026).
Q1.9.5	The applicant	Article 12 (Temporary closure, restriction or prohibition of use of streets and public rights of way (PRoW)) - Explain why a general provision is made for any street, PRoW as well as those listed in schedule 5. Why is such a broad power needed and justified in this case? - Why does article 12(2) not apply to all pedestrians, rather than only pedestrians going to or from premises abutting a street or public right of way? What is meant by ‘reasonable access’? - To what extent would diversions be possible where a street or PRoW is affected by this article? What provision is being made for diversions?

ExQ1	Question to:	Question:
Q1.9.6	The applicant	Article 13 (Use of private roads) - Is a definition required for 'private roads'? For example, does it include private driveways and access tracks? - A plan is requested showing the location of private roads within the Order limits. - Should article 13 refer to such a plan or alternatively, could private roads be listed in the same way that Article 8 (street works) are listed in schedule 3 of the dDCO?
Q1.9.7	The applicant	Article 18 (Removal of human remains) - Explain why the likelihood of identification of human remains is so significant in this case to justify this article, noting that it has been omitted by the Secretary of State in several recently made orders? How does this case differ from those cases to justify its inclusion? - Can appropriate provisions be included in the Archaeological Mitigation Strategy [APP-173] and the subsequent written scheme of investigation (R12) as an alternative to this article?
Q1.9.8	The applicant	Article 24 (Compulsory acquisition of rights) This article provides for the acquisition of rights or the imposition of restrictive covenants over the Order land. It applies to the Order land specified in column 1 of schedule 8 (Land in which only new rights etc. may be acquired), but also undefined rights for Order land not listed in schedule 8. - The recently published Planning Act 2008: Guidance on preparing an application: Part 3 – Contents of a draft Development Consent Order (July 2026) says that 'where land is proposed to be subject to the imposition of restrictive covenants, dDCO provisions must identify the land to which they relate and the nature of the restrictive covenant to be imposed. How does the drafting of article 24 reflect this guidance? - For the general power, what rights etc are sought and for what purpose? - Is there evidence that persons with an interest in the Order land were aware that undefined new rights are being sought over all the Order land?
Q1.9.9	The applicant	Articles 31 and 32 (Temporary use of land) - Provide justification for the limited 14 day minimum notice period set out in 31(3) and 28 day period set out in 32(3). Explain how these are justified with reference to the potential implications for landowners (including but not limited to farmland) who may need a longer period of notice in order to reasonably plan for the ongoing use of their land. - Would it be necessary to give notice of the period for which temporary possession is sought in order to provide more clarity for landowners? - Article 31(10) sets out that "The undertaker must not compulsorily acquire, acquire new rights over or impose restrictive covenants over, the land referred to in paragraph (1)(a)(i) under this Order". The compulsory acquisition order is also expressly subject to this article. However, explanation is needed for why this has not been expanded to land not listed in schedule 10 that is temporarily possessed under 31(1)(a)(ii)? - Has there been evidenced consultation with owners of all land not listed in Schedule 10, in order that they are aware that their land could be temporarily possessed? If this has not been carried out, explain how the proposed approach is justified for the land not listed in Schedule 10?
Q1.9.10	The applicant	Article 37 (Consent to transfer the benefit of the Order) - In respect of 37(3)(a) would holders of a licence have sufficient covenant strength to comply with the terms of this agreement? - In respect of 37(3)(b), notwithstanding the explanation in the Explanatory Memorandum [APP-034], explain why the transfer is necessary or if the holding company would have sufficient covenant strength to meet the obligations. - In respect of 37(3)(c) explain whether a transferee would have sufficient covenant strength to comply with the decommissioning requirements?
Q1.9.11	The applicant	Article 39 (Planning permission etc) Provide further justification for the inclusion of this article in this case, following the omission of similarly worded articles in recently made orders for solar projects (for example One Earth Solar Farm and Fenwick Solar Farm).

ExQ1	Question to:	Question:
		b) What is the specific justification for the inclusion of 39(1) which would appear to allow development not authorised by the DCO to be carried out within the Order limits pursuant to a planning permission, rather than the need to apply for a change to the DCO through s153 of the Planning Act 2008. c) Provide details of any particular schemes which had led the applicant to consider that the drafting in 39(3) is necessary.
Q1.9.12	The applicant	Article 40 (Felling or lopping of trees and removal of hedgerows) a) The wording ‘near any part of the authorised development’ is vague and imprecise. Other recent orders have used terms such as ‘within or overhanging the Order limits’. Can the drafting be amended to rectify this? b) Explain what controls and mitigation would be in place in connection with the general power for the removal or works to trees and shrubs, bearing in mind paragraph 4.33 to 4.35 of the Guidance on preparing an application: Part 3 – Contents of a draft development consent order (July 2026)?
Q1.9.13	The applicant	Article 49 (Crown rights) Should the word ‘take’ be deleted from 49(1)? If not, justify its inclusion.
9.2 Schedule 1 – Authorised development		
Q1.9.1	The applicant	Work No.3 (On site substations) The drafting for Work No.3A (400 kilovolt (kV) substation) and 3B (132 kV substation) implies that there would be only one substation in each case, whereas up to three are proposed in each case as set out in ES Chapter 4 (The Scheme) [APP-040]. Would it be clearer if the maximum number of substations is set out in the drafting for Work No.3 (noting the drafting in the draft Botley West Solar Farm Order and the made Peartree Hill Solar Farm Order)?
Q1.9.2	The applicant	Work No.4 (National Grid substation) a) The drafting for Work No.4A includes ‘a new 400kV AIS substation’. Does ‘AIS’ need to be defined? b) The drafting for Work No.4A goes on to say ‘includes typical substation infrastructure in line with good working practice and standards’. This is general and unspecific. Can the wording be updated to be more precise?
Q1.9.3	The applicant	Work No.5 (Connection to overhead transmission electrical line) There may be some repetition between the works as set out in Work Nos. 5A, 5C and 5D, particularly in relation to works proposed to the existing overhead transmission electric line. For example, Work No.5A includes ‘works to modify’ and ‘reconfigure’, 5C includes ‘modification of existing pylons’ and 5D includes ‘modifying and removal of existing overhead transmission line and pylons’. The drafting may also be able to be made clearer and more precise. a) Please provide further clarification of the works proposed for Work Nos.5A, 5C and 5D, including supporting material to illustrate what is being proposed. b) Could the work descriptors in the dDCO drafting be amended to be clearer and more precise?
Q1.9.4	The applicant	Approval of details and control of proposed works R5 of the dDCO [AS-032] provides for the detailed design approval of Work Nos.1, 2 and 3. It is noted that this will be updated at deadline 1, including provision for the detailed approval of Work No.4 (National Grid substation). For those works not covered by the approval of details requirement, explain how each work would be either the subject of further approval and/ or be covered by relevant control documents/ management plans. For any proposed work that would not be the subject of either further detailed approval or a relevant control document/ management plan, provide justification for this.
9.3 Schedule 2 – Requirements		
Q1.9.1	The applicant	General drafting of requirements Several requirements (including R6, R7, R8, R9, R10, R12, R13, R14, R15, R16, R17, R18, R19 and R21) include drafting to the effect that further submissions ‘must be substantially in accordance with’ the relevant outline plan or, in the case of R4, the relevant design principles, parameters and commitments.

ExQ1	Question to:	Question:
		The use of this wording may create uncertainty for parties in what should be submitted and it is not clear how it would meet the test of precision. Furthermore, given that the relevant plans are outline in any case and the design parameters are maxima it is not clear how this wording can be justified. The ExA suggests that this phrase is amended to 'must be in accordance with'. If not, robust justification would need to be provided.
Further questions on the dDCO will follow at ExQ2.		
10. Ecology and biodiversity		
Q1.10.1	Natural England	Bat surveys Provide Natural England's view on whether the information submitted within ES Chapter 8 (Ecology and Biodiversity) [APP-044] and the supporting appendices is sufficient to establish the baseline for bat populations, including barbastelle bats, and to enable the assessment of likely significant effects of the proposed development? In response, can Natural England include reference to woodland adjacent to the Order limits.
Q1.10.2	The applicant (a, b, c) and SNDC (a)	Great crested newt surveys In light of SNDC's concerns [RR-1795] regarding further great crested newt survey work at additional water bodies created as part of the Long Stratton Bypass landscaping scheme, and the applicant's response [PDA-008] that access to these ponds has previously been requested but not provided, can the applicant and SNDC discuss this matter and provide an update at deadline 1 confirming: a) Whether access has been agreed. b) Whether any further survey or assessment work has been or will be undertaken and when this would be. c) How and when the outcome of any further survey/ assessment work would be submitted.
Q1.10.3	Norfolk Wildlife Trust	Wintering birds In reference to your RR [RR-1453], explain why you consider that impacts on wintering bird assemblages require further consideration. Please include any relevant site-specific factors, specific species of concern and any further supporting evidence.
Q1.10.4	NCC	Roadside Nature Reserves NCC raised concern that the applicant has used older mapping which may not include newer Roadside Nature Reserves [RR-1451]. Can NCC confirm whether any additional Roadside Nature Reserves should be included in the application and provide any details of these?
Q1.10.5	The applicant	Local Nature Recovery Strategy SNDC's RR [RR-1795] and Natural England's RR [RR-1410] raised matters in relation to measures being delivered through the Norfolk Local Nature Recovery Strategy (LNRS). In the absence of an update to section 8.9 of ES Chapter 8 (Ecology and Biodiversity) [APP-044], can the applicant clearly set out the measures proposed to enhance biodiversity and ecological connectivity and explain how these measures would contribute to the LNRS.
Q1.10.6	The applicant	Biodiversity Net Gain metric and condition assessment SNDC has requested a Biodiversity Net Gain (BNG) metric spreadsheet and condition assessments [RR-1795], please can these be provided at deadline 1.
Q1.10.7	The applicant	Biodiversity Net Gain R9 of the dDCO [AS-032] secures a minimum of 10% BNG across all units, whereas the BNG Report [APP-218] demonstrates 37.42% gain for habitat units, 31.35% gain for hedgerow units and 16.08% for watercourse units. Which of the figures are relied on in the assessment of beneficial effects in chapter 8 [APP-044] and the weight given in the planning balance within the Planning Statement [APP-209]?

ExQ1	Question to:	Question:
Q1.10.8	The applicant	Retained Agricultural Land Retained agricultural land is detailed in the Indicative Masterplan [APP-059] and further referred to in the outline Landscape and Ecology Management Plan [APP-199]. What is the purpose of the agricultural land which is not being used for mitigation purposes (i.e. Skylark mitigation) and why is it necessary to include this land within the Order limits?
11. Landscape and visual		
Q1.11.1	The applicant	Residential visual amenity Paragraph 2.1.11 of the Residential Visual Amenity Assessment (RVAA) [APP-148] explains that it is unlikely that the proposed development would result in an ‘overbearing’ or ‘overwhelming’ visual effect beyond 500m from the maximum development parameters. However, despite the 500m and 250m study area and offsets, table 1 of the RVAA [APP-148] only assesses properties within the 100m study area. Explain in further detail why only properties within the 100m study area were assessed with RVAA methodology. In particular, explain the rationale for this where residential properties are located in proximity of larger and taller elements of the proposed development such as the proposed National Grid substation (Work No.4), 400kV substations (Work No.3) and BESS (Work No.2).
Q1.11.2	The applicant	Residential visual amenity Sheet 8 of the Residential Receptors Plan [APP-084] shows property BESS 1-1 (Frith Farm) to be within the 100m offset study area. However, this property does not appear to have been included within the assessments contained within table 1 of the RVAA [APP-148]. The applicant is requested to provide the assessment for this property in an updated RVAA.
Q1.11.3	The applicant	Residential visual amenity Paragraph 2.1.17 of the RVAA [APP-148] explains that in identifying properties for further assessment, the focus is placed on year 15 of the operational phase when landscaping mitigation is fully established, noting that this represents the stage at which the property and its occupants are expected to experience the effects of the scheme for the longest period during its lifetime. Notwithstanding this, as there could be properties that might be subject to significant visual effects from year 1 to year 15 and noting that this could represent a considerable period of time for the occupiers, the applicant is requested to also identify and assess any residential properties that may be subject to a significant visual effect from years 1 to 15 of operation.
Q1.11.4	The applicant	PRoW visual amenity The PRoW Visual Amenity Assessment [APP-149] sets out the applicant’s assessment of the impacts on users of footpaths and bridleways etc within the Order limits. ES Chapter 7 (Landscape and Visual) [APP-043] includes assessment of the visual effects on view locations including those on PRoW. Notwithstanding the applicant’s compartmentalised assessments referred to above, there is little in the way of a cumulative assessment of the effects on recreational users of PRoW who would be likely to traverse more than one named PRoW on any particular journey. For example, residents of Great Moulton or Saxlingham Nethergate/ Saxlingham Green (and other villages and settlements) may partake on circular routes to and from these villages involving a number of different footpaths. Consequently, building on assessment work already carried out, the applicant is requested to provide an assessment of the likely cumulative/ sequential visual effects on footpath users across the Order limits, taking account of the combined effects on users of commonly used footpath routes near to existing settlements.
Q1.11.5	The applicant	PRoW visual amenity Great Moulton footpaths 13 (FP13) and FP15 at site 1 as identified within the PRoW Visual Amenity Assessment [APP-149] are not marked on the PRoW Receptors Plan – figure 7.10 of the ES [APP-085]. The applicant is requested to update figure 7.10 to show the location of Great Moulton FP13 and FP15 and also to check the entire document to ensure that all other PRoW are correctly marked.
Q1.11.6	The applicant, SNDC and NCC	Proposed substations SNDC has raised concerns [RR-1795] regarding the landscaping of the three proposed 400kV substations. a) The applicant is requested to provide further explanation for its proposed landscaping strategy in proximity of all the proposed substations (including National Grid, 400kV and 132kV substations), including how the proposals would effectively reduce and mitigate potential landscape and visual effects.

ExQ1	Question to:	Question:
		b) The applicant is requested to engage with SNDC and NCC with the aim of ensuring that the proposed landscaping near to the proposed substations and other infrastructure is optimised taking account of potential landscape, visual and heritage effects. An update on this engagement is requested at deadline 1. This should also include ensuring the adequacy of measures contained in the relevant outline management plans.
Q1.11.7	The applicant, NCC, SNDC	Advanced planting The applicant's response [PDA-008] to NCC's RR [RR-1451], seeking further clarification on the advance planting and phasing of landscape mitigation, states that it will explore proposals for advanced planting and review opportunities for additional commitments. The applicant, NCC and SNDC are requested to continue discussions on this and provide an update at deadline 1, including locations and components of the development where advanced planting would be beneficial in reducing and mitigating landscape and visual effects and how proposals for advanced planting would be secured through the DCO.
12. Noise and vibration		
Q1.12.1	The applicant	Questions on this topic will follow within ExQ2
13. Soils and agricultural land		
Q1.13.1	The applicant and Natural England	Reliance on future surveys, procedures and methodologies, to be developed post-consent The outline Soil Resource and Management Plan [APP-204] identifies that a number of matters, including cable route corridor surveys, soil characterisation, stockpile arrangements, monitoring procedures and restoration methodologies, would be developed post-consent. Comment on whether the outline Soil Resource and Management Plan [APP-204] provides sufficient certainty regarding mitigation effectiveness and restoration outcomes and identify any additional matters which would need to be defined or secured before the Secretary of State for Energy Security and Net Zero could conclude on likely significant effects.
14. Traffic and transport		
Q1.14.1	The applicant	Reliance upon future mitigation and future approvals A number of the mitigation measures relied upon within the transport assessment would be developed, refined, agreed or approved only following any grant of development consent. Which of the mitigation measures remain subject to future approval, detailed design, agreement with highway authorities or approval through management plans?
15. Water environment		
Q1.15.1	The applicant	Reliance on future site investigations What proportion of the proposed development area remains subject to future infiltration testing? Can the applicant confirm that the suitability, extent and effectiveness of any infiltration-based drainage measures cannot be finalised until that testing has been completed?
Q1.15.2	The applicant	Reliance on future drainage design Can the applicant confirm that the drainage strategy remains at an outline level and that detailed drainage design would be undertaken following any grant of development consent? State the number of final drainage layouts, discharge locations and associated hydraulic calculations to be fixed for all elements of the proposed development.
16. Other matters		
Q1.16.1	The applicant	Ground conditions: adequacy of the ground conditions baseline and EIA With reference to ES Appendix 16.1 [APP-184] and RRs, explain how the applicant has demonstrated that sufficient baseline information is available at the application stage to characterise ground conditions, groundwater and contamination receptors and to support the conclusion that no likely significant effects would arise, having regard to the absence of application-stage intrusive ground investigations and the proposed reliance on post-consent investigations and assessments.

ExQ1	Question to:	Question:
Q1.16.2	The applicant	Ground conditions: reliance on post-consent assessment and mitigation Having regard to the EIA Regulations and relevant NPS requirements, explain why the applicant considers it appropriate to conclude that no likely significant effects would arise where foundation works risk assessments, hydrogeological risk assessments, detailed investigations, design refinement and other mitigation measures are proposed [APP-052] to be undertaken post-consent.
Q1.16.3	The applicant	Waste and Materials: waste forecasting assumptions Provide a concise justification for the principal assumptions underpinning the construction, replacement and decommissioning waste forecasts [APP-054] , including PV panel replacement rates, BESS replacement rates, recovery rates and recycling rates, and explain why the applicant considers those assumptions to represent an appropriate basis for assessment over the lifetime of the proposed development.
Q1.16.4	The applicant	Waste and Materials: confidence in decommissioning and replacement waste assessment conclusions Given the scale of forecast decommissioning and replacement waste arisings, explain the degree of confidence that can presently be placed in the assessment's conclusions [APP-054] for those phases and identify any assumptions regarding future recycling infrastructure, treatment capacity or waste markets on which those conclusions depend.
Q1.16.5	The applicant	Waste and Materials: hazardous waste capacity The applicant's procedural deadline A submission [PDA-008] refers to ES Chapter 18 [APP-054] identifying a moderate adverse and significant effect in relation to hazardous waste capacity during operation and decommissioning. Explain the evidential basis for this conclusion, including the quantities and principal waste streams assessed, the facilities and infrastructure assumed to be available, and the basis for concluding that residual effects would be appropriately mitigated.